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September 9, 2013

Mr. Byron Coy, P.E.  
Director, Eastern Region  
Pipeline and Hazardous Material Safety Administration  
820 Bear Tavern Road, Suite 103  
West Trenton, NJ 08628

**CPF: 1-2013-3003M**

**Re: Response to Notice of Amendment (NOA) - Station 240  
Carlstadt, New Jersey  
Revision of Liquefaction Procedures**

Dear Mr. Coy:

On Aug 21, 2013, Williams received a NOA from PHMSA –Eastern Region. The NOA pertains to a 49 CFR Part 193 inspection of the Williams LNG facility, Station 240, in Carlstadt, New Jersey, during the week of October 15, 2012.

During the inspection, the PHMSA representative identified inconsistencies between two procedures regarding the liquefaction process. The first procedure, Procedure 3, titled “Description of Plant Process” explained the liquefaction process, in Section B, with expected temperature and pressure values. The second procedure, Procedure 12, titled “Start up Liquefaction Section” provided specifications for start up of the liquefaction process including a table containing temperature and pressure ranges.

The inconsistencies identified in the inspection were between the cited temperature values between the two procedures. The temperature ranges in Procedure 12 were originally written to provide an example of typical ranges but not necessarily what was required in order to operate. As a result, Williams has modified Procedure 12 by widening the temperature ranges to allow for more consistency with Procedure 3, and by clarifying that the ranges are “typical”. Both procedures are enclosed for your review.

Williams believes that these modifications have addressed the concern of the PHMSA representative as noted in the NOA. Please advise if further action is required.

Sincerely,

Marie G. Sotak  
Manager Pipeline Safety, Gas and Liquids – East

Enclosure

cc: Dan Merz, Williams Senior Counsel  
Joe Neave, Williams, Vice President, Safety and Regulatory Compliance  
Steve Potts – Williams, Director – Pipeline and Process Safety