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Larry Legendre
Manager Pipeline Safety
Williams Atlantic Gulf

December 21, 2017

Mr. Robert Burrough
Director, Office of Pipeline Safety
Pipeline and Hazardous Materials Safety Administration Eastern Region
820 Bear Tavern Road, Suite 103
West Trenton, NJ 08628

Re: CPF 1-2017-1017 – Notice of Probable Violation and Proposed Compliance Order

Dear Mr. Burrough,

On November 27, 2017 Williams Transcontinental Gas Pipeline Company (Transco), received the subject Notice of Probable Violation (NOPV) and Proposed Compliance Order (PCO) from the Pipeline and Hazardous Materials Safety Administration (PHMSA). The NOPV is the result of PHMSA Eastern Region's inspection of Transco's Princeton and Charlottesville Divisions in 2016. This letter serves as Williams' formal response to the NOPV and PCO.

In accordance with the "Response Options for Pipeline Operators in Enforcement Proceeding" enclosed with the NOPV, Williams provides the following Responses:

Notice of Proposed Violation

Williams has elected not to contest the violation alleged in the NOPV.

Response to the Proposed Compliance Order

Williams has elected not to contest any of the items described in the PCO, however, Williams respectfully requests the following revisions:

- Extend the timeline provided under Items 1 and 2 of the PCO to allow 180 days following receipt of the Final Order.

- Extend the timeline provided under Item 3 of the PCO to 365 days from the date of discovery of any deficiencies identified via Item 1 of the PCO.

We are concerned that the time required to complete the items listed in the PCO will exceed the provided deadlines. Remediation of any deficiencies identified in this process will require additional time based on material orders and/or delivery lead times. Williams will provide periodic updates of these remediation efforts to the Region Director if so requested.

Williams is strongly committed to the safe operations of all pipeline systems. Please contact me, Larry Legendre at 713-215-2733 if you would like to discuss or if you need any additional information. Thank you for your consideration regarding these matters.

Sincerely,



Larry Legendre