

**U.S. DEPARTMENT OF TRANSPORTATION
PIPELINE AND HAZARDOUS MATERIALS SAFETY ADMINISTRATION
OFFICE OF PIPELINE SAFETY
WASHINGTON, D.C. 20590**

In the Matter of

Transcontinental Gas Pipe Line Company, LLC,

CPF No. 4-2016-1008

Respondent

**PETITION FOR RECONSIDERATION OF TRANSCONTINENTAL GAS PIPE LINE
COMPANY, LLC**

Respondent Transcontinental Gas Pipe Line Company, LLC offers the following Petition for Reconsideration (Petition) of the Associate Administrator for Pipeline Safety's Final Order in the subject proceeding, dated December 20, 2018. Respondent received the Final Order on December 26, 2018. The Petition is therefore timely under 49 C.F.R. §190.243. Respondent accepts the findings and penalty assessed in the Final Order, but requests that the supporting explanation for the findings associated with Violation Item 1 be revised as set forth below.

In his discussion of Violation Item 1, the Associate Administrator refers to an alleged statement from Williams¹ employee Shane Frasier that was contained in the OPS Violation Report.² The statement is found in the first full paragraph on Page 3 of the Final Order. This paragraph also refers to testimony and affidavits submitted by Mr. Frasier and another Williams employee which refute this alleged statement.³ The paragraph further notes that the OPS investigator who authored the Violation Report, Molly Atkins, was not available at the hearing of

¹ Williams is affiliated with Respondent.

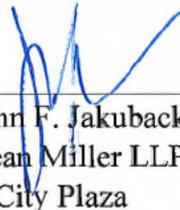
² Final Order at 3.

³ Id.

the matter.⁴ The Associate Administrator then concludes that the two sides offered competing claims as to the timing and sequence of events on the date of the incident, and proceeds to consider other evidence in reaching a decision to withdraw Item 1.⁵

The paragraph containing the alleged statement from Mr. Frasier is purely dicta, without any bearing whatsoever on the ultimate determination of whether or not a violation occurred. In fact, the statement appears to have been completely disregarded by the Associate Administrator in reaching his decision. Moreover, the alleged statement is inflammatory, erroneously suggesting that Williams management knowingly hindered the release of information pertaining to the ongoing incident response effort. For these reasons, we request that this paragraph be stricken from the Final Order.

Respectfully submitted:



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⁴ Id.

⁵ Id.