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January 14, 2009

Mr. Jeffrey D. Wiese
Associate Administrator
Department of Transportation
Pipeline and Hazardous Materials
Safety Administration
1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

Re: Voluntary Damage Prevention Projects

Dear Mr. Wiese:

As part of our response to the incident in Chantilly, Virginia and in furtherance of our commitment to take affirmative steps to enhance pipeline safety in the communities where we operate, we are committed to sponsoring and funding the Voluntary Damage Prevention Projects outlined on the attached Exhibit A.

We share PHMSA's interest in these projects and look forward to their successful development and implementation. Please contact me if you wish to discuss any of these projects in more detail.

Sincerely yours,

Randall Barnard
Senior Vice President
Williams Gas Pipeline Company, LLC
P.O. Box 1396
Houston, TX 77251

Attachment

Exhibit A

Description of Voluntary Damage Prevention Projects

1.. Develop 811 DVD and Supplementary Educational Material

The goal of this program is to educate students in the primary grades about the importance of calling 811 before digging. This would be accomplished through a comprehensive and interactive toolkit supported by online components. The overall program will support the Common Ground Alliance's (CGA's) "Five Steps to Safer Digging" campaign:

1. Call 811 Before You Dig
2. Wait the required amount of time
3. Locate Accurately
4. Respect the Marks
5. Dig with Care

Project Description: In the past, a number of CGA stakeholders have developed materials targeting school-aged children. To date, these programs have not been comprehensive.

The goal of these programs has been similar – to reach students at an early age with the call-before-you-dig message encouraging them to share this information with their parents. Those states/organizations who have tackled this audience in the past have found the programs very successful at a local level.

In order to utilize this approach toward the schools in proximity to WGP pipelines, a comprehensive and consistent program is needed. Through a partnership with Williams, the CGA proposes the development of a complete program that can be shared/distributed to schools that could be affected by a WGP natural gas pipeline incident.

Objectives: To design a safety program that melds into an existing curriculum that is age appropriate, interactive, and involves a follow-up activity/leave-behind that requires action by the parent/guardian.

- DVD content would reflect safe digging practices regarding pipelines and other utility types
- DVD content would highlight how to detect a release and steps to take should a natural gas line be damaged
- DVD content would promote the 811 call before you dig number

The design of the program can be converted seamlessly to the Internet in an effort to expand the universe. The DVD content will have the ability to be viewed and all supporting documents will have the ability to be interactive. Upon completion, the student can download a certificate in an effort to engage the parent/guardian.

WGP Safety Improvement: The Chantilly incident involved the evacuation of an elementary school because of leaking gas from the damaged pipeline. The educational program will be targeted at schools in proximity to the WGP pipeline right of way in the state of Virginia. The education of school children on the purpose of 811 and how to recognize and respond to a natural gas leak will provide a creative tool for promoting awareness of the goals of damage prevention. The program can eventually be expanded nationwide after successful evaluation.

Project Cost Estimate:

$100,000 total (cost breakdown below)

Project Schedule:

PHASE 1: Research and Concept Testing – Focus group testing & feedback ($10,000) – April 2009

PHASE 2: Creative Elements & Support Materials - Scripting, on-location filming and post production of a 7 – 9 minute educational video ($75,000) – July 2009

PHASE 3: Toolkit production and distribution – DVD, activity guide, etc. ($10,000) – August 2009

PHASE 4: Evaluation – Compile quarterly web based reports & final annual report ($5,000) – August 2010

2. Adopt a Community Program – Fairfax County

Land use practices among pipeline operators and other community stakeholders will become more effective as new technologies allow for improved communication methods. This project consists of three pilot programs designed to enhance protection of the Fairfax County community at a local level with the goals of successful implementation and dissemination of best practices to other communities. PHMSA, WGP, and VUPS have a common interest in enhancing the safety of our communities, which is the primary goal of this effort. See the attached full proposal for project metrics and other details.

E-911 Alert Notification - An E-911 emergency center dispatch notification is being developed that provides a means of communication during public emergencies between the E-911 center and utility operators. Fairfax County was originally selected for this pilot project but the E-911 center is currently involved in relocation of facilities. Therefore, if the project is not performed in Fairfax, it will be performed in one or more Virginia counties traversed by WGP.

The E-911 Alert Server system will enable the County and/or City E-911 centers to quickly communicate with WGP and other utility operators. The E-911 Alert Server will provide E-911 dispatchers the ability to quickly alert utility operators of emergencies and amber alerts utilizing a geo-politically correct land-base map and a state of the art, user friendly application.

Upon creation of the One Call ticket, it can be immediately transmitted to all utility operators that have identified owning/operating underground utilities within the proposed area of excavation. This proposal will focus on the modification of this application to provide E-911 centers the capability to utilize the application and the VUPS land-base map to create an E-911 notification to utility operators.

WGP Safety Improvement: The ability to quickly notify utility operators of public emergencies such as a leaking gas pipeline will provide the ability to enable access to emergency officials and provide assistance when appropriate. Pipeline operating personnel are trained in the Incident Command System and with more advance notice of emergencies can respond faster to their own facility emergencies and offer assistance to others when needed.

Project Cost Estimate:

Norfield Data Products one-call integration ($22,000)
Commonwealth Technology Group voice call out integration ($50,000)

Project Schedule:

Meet with emergency response officials -	4/01/2009
Contact each of the VUPS member utilities -	6/01/2009
Train and initiate usage -	7/01/2009

Encroachment Notification - VUPS has created a means to expand the area of excavation notification to a utility separate from the normal one-call ticket process. The notifications are informational and are to be used to track any trending in excavating movement. The data can also be used to create a public awareness contact list.

The normal excavation notification buffer for WGP One Call tickets is 300 feet on each side of the pipeline right of way. If an excavation occurs within the 300 foot buffer, WGP will receive a normal ticket requiring a positive response to the excavator and One Call Center according to State Law.

The "Encroachment" ticket will allow WGP to expand the notification area with a larger "Encroachment" notification buffer 300 feet outside the normal One Call ticket buffer described above while keeping the existing normal area of protection. This ticket will now inform of an excavation outside of the normal area of protection but within a selected Encroachment buffer area. This "Encroachment" ticket can be sent to anyone within WGP organization and does **not** require any response by the Positive Response System.

WGP Safety Improvement: The primary purpose of the additional 300 foot buffer for encroachment notifications is to test the value of receiving additional excavation information in a wider than normal corridor for improved trending capability and knowledge of activities outside the normal 300 foot corridor that can help to improve the focus of educational materials (See the metrics section in the proposal). The expansion of site-specific knowledge of excavation activities and excavation companies in proximity to WGP pipelines will improve the ability to communicate and target damage prevention best practices.

Project Cost Estimate:

Initial Baseline Survey; Post Project Survey; and Report - $22,000
Standard database queries of excavator contact information $3,000

Project Schedule:

Perform a baseline educational survey – complete
Develop a public education email message – complete
Perform follow up survey by the following date to determine effectiveness – 12/1/2010

Building Permit Notification – A One Call notification can be a last means of defense in the damage prevention process. Utilities are typically given a 48-hour notice of excavation activities that will occur adjacent to their facilities. The excavator will typically have plans already completed for the site. In the event of a right-of-way conflict, extensive rework of plans may need to occur, costing both the utility and project manager.

Typically, a One Call notification occurs just days prior to excavation, whereas a building permit could be filed with a municipality months prior to the one-call notification. VUPS has investigated a process of acquiring building permit data from municipalities, geo-coding the point of excavation and then transmitting the building permit data to a utility months in advance of the planned excavation.

VUPS proposes to capture data within an automated building permit process and integrate the data within its one-call software. If a building permit can be geo-coded (e.g., via physical address or GPS coordinates), VUPS can place the building permit location as a point within the VUPS base maps. The permit location can then be correlated to WGP registration polygons. Should these two intersect, VUPS will transmit the notice to WGP.

WGP Safety Improvement: Advance notice of new construction and excavation activities can provide WGP personnel the opportunity to review the proposed project locations to determine any potential detrimental impact to the pipeline right of way. Early involvement may provide a mutually beneficial project planning/location modifications and opportunities for damage prevention education.

Project Cost Estimate:

Building permit data download into XML format - $5,000
Norfield Data Products one-call integration - $20,000

Project Schedule:

Coordinate building permit software with one-call software – 6/01/2009
Production of a final report documenting the results – 6/01/2010