



We make energy happen.®

P.O. Box 18355
Oklahoma City, OK 73154-0355

September 18, 2015

Mr. Douglas Krofta
U.S. Fish and Wildlife Service
Division of Conservation and Classification
5275 Leesburg Pike
Falls Church, VA 22041-3803

Ms. Angela Somma
National Marine Fisheries Service
Office of Protected Resources
1315 East-West Highway
Silver Spring, MD 20910

**Re: Endangered and Threatened Wildlife and Plants; Revisions to the Regulations for Petitions
(Docket No. FWS-HQ-ES-2015-0016)**

Dear Sir or Madam:

The Williams Companies (Williams) is an energy infrastructure company focused on connecting North America's significant hydrocarbon resource plays to growing markets for natural gas, natural gas liquids (NGLs) and olefins. Williams owns and operates midstream gathering and processing assets, and interstate natural gas pipelines. In addition, Williams processes oil sands off-gas and produces olefins for petrochemical feedstocks. These operations span from the deepwater Gulf of Mexico to the Canadian oil sands and from the Pacific Northwest to the Eastern Seaboard.

Williams works closely with local, county, state and federal government officials and regulators to facilitate the development of natural gas resources in accordance with applicable laws and regulations. Williams' corporate philosophy has always included a steadfast commitment to strengthen communities by making the areas in which it operates a better place to live, work, and raise families. Additionally, Williams takes a leadership role with regard to conservation of natural resources potentially impacted by its projects.

Williams respectfully submits these comments in response to the above referenced docket for the United States Fish and Wildlife Service and the National Marine Fisheries Service (Collectively the Services) Proposed *Endangered and Threatened Wildlife and Plants; Revisions to the Regulations for Petitions*. These proposed revisions will affect the procedures by which the Services evaluate petitions to list,

reclassify, or delist a species from the Federal List of Endangered and Threatened Wildlife or List of Endangered and Threatened Plants.

Because of the extent of Williams' operations, the potential exists to intersect areas inhabited by species that have been, or will be, petitioned for considered by the Services. Decisions related to listing of such species and/or realignment of species' critical habitat can significantly impact the timing, scope, and execution of Williams' projects and operations.

As a member of both the American Petroleum Institute (API) and the Interstate Natural Gas Association of America (INGAA), Williams concurs with the comments submitted by both of these industry trade organizations. Furthermore, Williams offers the following comments.

Williams supports the Services' proposed changes to the petitioning process. Specifically, Williams agrees with the Services' proposal to no longer accept multi-species petitions. This revision will streamline the process and enhance the efficiency of the Services' review.

Williams believes the Services' should require petitioners consult with states prior to filing a petition and seek comments and opinions on the merits of the petition. The various state conservation agencies often maintain the most up-to-date data on species within their borders which the Services may not have readily available. Therefore, it is critical the Services require petitioners to consult with these state offices prior to submitting a petition for the Services' review.

Williams recommends the Services allow the states up to 90 days of time in which to review and respond to each petition. Williams supports the inclusion of this additional step to ensure that all listing and reclassifying decisions are based on the most recent and complete sound science and concurrence by the states.

Finally, petitioners should be required to notify all states of ongoing consultations with other states. This can promote the sharing of data, increase efficiencies in the states' review and ensure that all listing decisions elevated to the Services are based on the best available scientific data.

Williams appreciates the opportunity to provide comments to the Services on these important revisions. If there are questions regarding these comments, please feel free to contact me at 405-496-8454 or john.satterfield@williams.com.

Sincerely,

John Satterfield
Sr. Director – Government Affairs & Environmental Programs