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VIA FEDERAL EXPRESS

Surface Transportation Board
395 E Street, SW
Washington, DC 20423

Attention: Danielle Gosselin
Section of Environmental Analysis
Environmental Filing FD 35116

**RE: Reactivation of Beech Creek Railroad;
 Decision ID No. 40943; Docket No. FD 35116;
 R.J. Corman Railroad Company/Pennsylvania Lines Inc.;
 Construction and Operation Exemption;
 Clearfield and Centre Counties, Pennsylvania**

Dear Ms. Gosselin:

At the request of our client Williams Production Appalachia LLC (“Williams”), this letter is respectfully submitted to the Surface Transportation Board (the “Board”) in the above-referenced docket to (i) inform the Board that Williams has succeeded Rex Energy I, LLC as operator on its Resource Recovery, LLC leasehold in Centre County, Pennsylvania, and (ii) provide comments on behalf of Williams with respect to the Draft Environmental Impact Statement (the “Draft EIS”) issued by the Board’s Section of Environmental Analysis on July 23, 2010 in that docket.

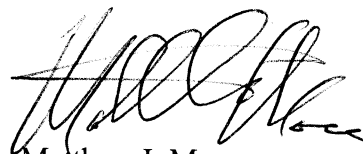
Williams is actively exploring for and producing natural gas from the Marcellus Shale in Central Pennsylvania and is currently conducting exploration activities on the Resource Recovery, LLC leasehold.

Williams' interest in the restoration of rail service to that area stems from its need for drilling equipment and bulk materials, such as pipe, to be transported into the area for its operations, and its view that rail would be a beneficial means of doing so.

Williams agrees with the view, expressed in the Draft EIS, that rail service would help reduce vehicle traffic and emissions for the operations discussed in the Draft EIS, including those of Williams. Specifically, Williams agrees that "[w]hen analyzing the potential for community disruption, both the Proposed Action and the Modified Proposed Action would be more preferable from an environmental justice perspective than the Local Road System Upgrade alternative and its associated increase in truck traffic on local roadways." Draft EIS, p. ES-17. See also Draft EIS, p.p. ES-26, 2-21 and 4-3, and Section 4.1.2. Williams also agrees that "the estimated annual emissions from the Local Road System Upgrade alternative would be significantly higher than that of the proposed rail line due to the lower fuel efficiency of trucks as compared to rail." Draft EIS, p.p. ES-14 and 4-23.

Williams anticipates having a long term presence in the area and appreciates this opportunity to address the benefits of rail service restoration to an area of its operations.

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AND ZOMNIR, P.C.



Matthew I. Moses

MIM/klr

cc: Dean Tinsley, E&P District Manager, Williams Production Appalachia LLC
F. Scott Hodges, Director Land, Rex Energy I, LLC
E.B. Abel, Jr., President, Resource Recovery, LLC
Kevin Starner, CEP, Skelly and Loy Inc.