FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 2
Transcontinental Gas Pipeline
Company, LLC
Docket No. PF14-8-000
§ 375.308(z)

July 3, 2014

Mr. William H. Hammons
Regulatory Analyst, Lead Rates and Regulatory
Transcontinental Gas Pipe Line Company, LLC
2800 Post Oak Boulevard
P.O. Box 1396
Houston, TX 77251-1396

Re: Staff's Comments on Initial Draft Resource Reports 1 and 10

Dear Mr. Hammons:

Enclosed please find FERC staff's comments on draft environmental resource reports (RRs) for the planned Atlantic Sunrise Expansion Project (Project) filed by Transcontinental Gas Pipe Line Company, LLC (Transco) on April 30, 2014. The comments ask for clarification of discrepancies and identify missing information that we believe necessary to begin substantive preparation of an environmental impact statement for the project. To facilitate review of the revised RRs, Transco should include a matrix that identifies the specific locations in the RRs (i.e., section and page number) where the information requested in these comments may be found. These comments pertain specifically to initial draft RRs 1 and 10.

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Commission's website at http://www.ferc.gov/help/filing-guide/file-material.asp. Any Critical Energy Infrastructure Information should be filed as non-public and labeled **"Contains Critical Energy Infrastructure Information-Do Not Release"** (18 CFR 388.112). Cultural resources material containing location, character, or ownership information should be marked **"Contains Privileged Information - Do Not Release"** and should be filed separately from the remaining information, which should be marked **"Public."**

Thank you for your cooperation. If you have any questions, please contact me at (202) 502- 8954.

Sincerely,

Jennifer Kerrigan
Environmental Project Manager
Gas Branch 2

Enclosure

cc: Public File, Docket No. PF14-8-000

Enclosure

ATLANTIC SUNRISE PROJECT
DOCKET NO. PF14-8-000

ENVIRONMENTAL COMMENTS

Comments Initial Draft Resource Report 1

1. Include as part of table 1.2-2 a column indicating the distance and direction of the planned pipeline construction right-of-way relative to the existing right-of-way. Provide the separation distance (or range of separation distances) between the rights-of-way, and explain why they don't abut. Indicate the amount of overlap where applicable.

2. Identify the milepost locations of planned cathodic protection facilities and mark their locations on the alignment sheets. Identify the workspaces that would be outside the planned permanent right-of-way. Include data about the affected resources within the workspaces needed to install and operate them in appropriate sections of the resource reports.

3. Include a table that lists the anticipated months and years of construction for each of the major planned facilities (for the new pipeline, each loop, replacement segments, each new compressor station, and the modifications at each existing compressor station). How many spreads would be used for pipeline construction?

4. In section 1.3.2.13, provide the timing of restoration of an area following installation of the pipeline. Specifically, indicate the typical days between lowering-in, backfilling, final grading, and final restoration.

5. Confirm in section 1.3.3.2.1 that downstream flow would be maintained at all times when dry-ditch waterbody crossing methods are used.

6. What would the typical construction right-of-way width be at waterbody crossings? Indicate whether it would be reduced in a manner similar to wetland crossings.

7. Clarify in section 1.3.3.4 whether foam trench breakers would be used and explain the conditions/locations where they would be used. Provide relevant correspondence from the Pennsylvania Department of Environmental Protection regarding the use of foam trench breakers.

8. Indicate in section 1.3.3.5 whether drain tile crossings are anticipated. Explan how drain tiles would be marked, protected, temporarily repaired during

construction, and permanently repaired during restoration. Indicate if this issue will be addressed in RR8, Land Use, if it is not addressed in RR1.

9. Provide a table listing the planned crossing method for each public road that would be crossed.

10. Transco provided in Attachment C typical cross-section drawings of the planned construction right-of-way for the 42-, 36-, and 30-inch-diameter pipelines where it would follow a greenfield alignment; and the 42-inch-diameter pipeline where it would be adjacent to an existing pipeline. Provide similar typical cross section drawings for each of the other planned configurations including where: the pipeline would cross wetland areas; topsoil stripping would be conducted; and the pipeline would be collocated with an existing powerline, etc.

11. Provide the beginning and ending milepost locations where planned pipeline would cross karst areas. This information may be provided in RR 6, Geology.

12. Provide a detailed description of the construction and restoration methods that would be used in karst areas. This information may be provided in RR 6, Geology.

13. Explain the additional issues related to wells and springs that you would consider in karst areas. Several commenters who live in karst areas have expressed concern about their domestic water supplies that come from these sources. This information may be provided in RR 6, Geology, or RR 2, Water Resources.

14. Several commenters have expressed concern about construction across the Martic Fault. Describe the Martic Fault and provide the milepost location(s) where it would be crossed. Describe the construction and restoration methods that would be used across or near it. This information may be provided in RR 6, Geology.

15. Several commenters have stated that the Project would be constructed and operated in an earthquake prone area. Provide an analysis of the earthquake potential in the project area. Describe any additional measures that would be implemented to address this geological hazard. This information may be provided in RR 6, Geology.

16. Provide environmental information related to any new powerlines and other nonjurisdictional electrical facilities that would be constructed to the planned new compressor stations or that might be needed to support the planned compressor station additions. Under whose jurisdiction would these electric facilities be constructed? Who would obtain the permits for their construction? Who would construct and own these facilities?

Comments Initial Draft Resource Report 10

1. Include more detailed and specific information about the other existing and planned alternative energy projects referenced in section 4 (and supporting citations) and Transco's conclusions about these projects.

2. For each of the system alternatives that will be considered in section 5 of RR 10:
    a. provide a figure that shows the location of each of the system alternatives considered relative to the planned project;
    b. include text and tables that compare the affected resources of each system alternative to the planned project;
    c. identify any new facilities or modifications that might be necessary for each system alternative and quantify to the extent practicable the amount and location of new pipeline, pipeline loop, and new or added compression; and
    d. include in the assessment an evaluation of each system alternative and its ability to meet the purpose and need of the planned project.

3. Identify in section 6.1 the milepost range east of Compressor Station 517 that would be optimal as an aggregation location.

4. Estimate in section 6.1 the amount of additional compression (in horsepower) that would be required if the aggregation point is located west of Compressor Station 517.

5. Identify in section 6.1 the optimal milepost range for the end of the pipeline near Compressor Station 195 and provide additional explanation regarding the looping or horsepower that would be required if the end point is located north or south of the optimal milepost range.

6. For each major and minor route alternative evaluated in the summary of alternatives include a figure that clearly shows the alternative and corresponding segment of the planned route and that labels the beginning and ending milepost where each alternative deviates and rejoins the planned route.

7. Provide a revised analysis of the Diamond CPL North Alternative that incorporates into the comparative assessment of the planned route the portion of the CPL South route between Compressor Station 517 and the southern terminus of the alternative. With this portion of the CPL South route incorporated, provide a table with quantitative data comparing the following resources along the alternative and planned route: length, collocation, wetlands, waterbodies, developed lands, other land uses, and any other items that would be relevant to the comparison.

8. For the Williams Midstream CPL North Alternative, Transco Looping CPL South Alternative, and Western CPL South Alternative, provide a table that compares each alternative to the corresponding segment of the planned route. Include as part of the table quantitative data regarding length, length adjacent to existing rights-of-way, compression requirements, wetlands, waterbodies, land uses, and any other items that would be relevant to the comparison.

9. Confirm that if the Western CPL South Alternative were adopted, there would be no additional facilities required between the start of the alternative (the north end of the alternative) and the existing Compressor Station 517.

10. For each alternative evaluated in section 7, include a comparison table similar to the example table in section 6.4 listing the relevant resources that would be crossed or potentially affected along the planned route versus the alternative(s).

11. Include a table comparing each of the alternative compressor station sites evaluated in selecting the planned site.
    a. Clearly indicate in the table which is the planned site.
    b. In addition to the factors listed in the example table, include comparative information in the table for the length of the permanent temporary access roads used to construct and operate the site; the temporary and permanent acres required for construction and operation; the number of residences within 1,500 feet of the site; and the distances to the nearest noise sensitive areas.
    c. Describe the visibility of the alternative site from various vantage points and describe the soil characteristics and any aspects of the soils that may be of concern (e.g., high erodibility).
    d. Include as part of the analysis maps depicting topography, mapped wetlands or other sensitive resources, and aerial photography.

12. Compare the impacts (air and noise) of using gas fired compressors rather than the planned electric powered compressors at the new compressor station locations.

13. For each of the six major alternatives considered by Transco, provide all hydraulic studies (in electronic format) and estimated costs associated with each alternative.

14. Transco has evaluated three different routes in order to transport 850 MDth/d of new gas supply from the Williams' existing Zick Compressor Station in Susquehanna County, PA. Of these three alternatives, only two (Williams Midstream CPL North Alternative and the planned CPL North – Primary Route) are designed to transport the gas supplies in a westerly direction on the northern 24-inch-diameter Leidy Line for compression at Station 517 in order to enter

Transco's planned CPL South – Primary Route. The third alternative, Diamond CPL North Alternative, begins at the Zick Compressor Station and proceeds south and bypasses an opportunity to connect to the northern 24-inch-diameter Leidy Line and continues in a southwesterly direction to terminate at an interconnection with the planned CPL South – Primary Route in Northumberland County, PA.

a. Provide an additional route alternative by examining the possibility of the Diamond CPL North Alternative connecting with the Leidy Line, where it currently crosses the northern 24-inch-diameter Leidy Line about 15 miles upstream of Station 515, and would then flow gas west to Transco's Compressor Station 517 where the planned CPL South - Primary Route interconnects with the Leidy Line System.
b. Provide an additional route alternative by examining the possibility of the Diamond CPL North Alternative connecting with the three lines (24-inch, 36-inch and 42-inch-diameter) Leidy Lines and would flow and/or displace existing gas supplies at Station 517 for further transportation on the CPL South - Primary Route.
c. For each alternative, provide the hydraulic studies (in electronic format), the estimated environmental impact and the costs associated with this alternative. Include a description of the environmental challenges or concerns about this modification to the Diamond CPL North Alternative.

Document Content(s)