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DATE:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Kimberly D. Bose, Secretary

Federal Energy Regulatory Commission

888 First Street NE, Room 1A

Washington, DC 20426

RE: OEP/DG2E/Gas 2

Transcontinental Gas Pipe Line Company, LLC

Docket No. CP15-89-000

Environmental Assessment Response

Dear Mr. Chairman and Commissioners:

In response to the Garden State Expansion Project, Transcontinental Gas Pipeline Company, LLC inaccurately reported “Groundwater Resources within 150’ and up to one-mile” from the construction area associated with Station 203 located in Chesterfield Township, Burlington County, New Jersey. In addition, the report avoids interdependence to evade critical environmental regulation and oversight by segmenting projects.

In section **3.1 Groundwater Resources**, it inaccurately states: ***“We received comments on potential impacts on residential cisterns, wells, and septic systems in the Project area. However, no public or private supply wells were identified within 150 feet and up to one mile, respectively”. “No seeps or springs are present in the project area. Therefore, we do not anticipate any significant impacts on cisterns, wells or septic systems in the Project areas.”*** In fact, all homes located along County Route 528 within 150 feet and up to one mile, have wells and septic systems.

Residents of Chesterfield Township attended the Chesterfield Township Committee meeting held on November 12, 2015 and brought this to the attention of our Elected Officials. Deputy Mayor Michael Hlubik instructed the Township’s Engineer to provide a count of wells located in this vicinity.

Page 4 Section 5.0 of the EA states that the commission issued a notice of intent (NOI) to all affected landowners within 0.5 mile of the compressor stations. A canvassing of the homeowners within 0.5 mile radius revealed only 1 homeowner -- of at least 60 homeowners and 2 churches (one with a pre-school) -- was so informed before November 8, 2015.

Additionally, the Environmental Assessment report improperly overlooks the cumulative impacts of the Garden State Expansion Project and the Southern Reliability Link (SRL) pipeline. The companies segmented these projects and the PennEast project (Docket No. CP15-558) in order to break up the approval process to evade cumulative scrutiny, which is not allowed. It’s the same supply and quantity of gas that flows through the three projects. Both the Garden State Expansion Project and the SRL have a capacity of 18 Bcf (or 180,000 dekatherms per day ) and an in-service date that precisely match a precedent agreement signed by New Jersey Natural Gas, which obligates its captive utility ratepayers to purchase the identical amount of natural gas from PennEast.

Over the last several years, the gas industry has developed a pattern of improperly segmenting pipeline upgrade projects to meet a perceived need of higher pipeline capacity for natural gas without conducting the proper environmental reviews. I am concerned that Transcontinental Gas Pipeline Company, LLC is deploying a similar strategy for its pipeline upgrade projects, and that the immediate project is merely one of several projects dependent upon, and designed to operate in concert with, one another.

The commission’s decision to defer addressing the Delaware River Keepers’ (DRK) motion to intervene is ludicrous. The DRK motion outlines the negative impacts and lays out Transco’s expansion project in detail. The DRK motion deserves to be studied and addressed by the commission. To avoid any appearance of regulatory impropriety, the commission would be well served in addressing the cumulative effects of these three projects: Penn East, Garden State Expansion and the (intrastate) SRL.

Conversely, when the SRL project is evaluated singularly, the feasibility and the return on investment of it would most likely result in the cancellation of the project. There are no legitimate customers.

The section titled Air Emission Impacts and Mitigation,Page 40 of the Environmental Assessments states *“Long-term operating emissions of the Project facilities may result from the intermittent release of* ***non-criteria pollutants*** *from fugitive emissions or blow-downs at Station 203, Station 205, or the Chesterfield M&R, releasing natural gas, or from the stand-by generator at Station 203. Emission estimates from each facility, per year of operation,* ***are presented in table 13****. Emissions from operating these facilities would result in minimal long-term air quality impacts.”* The annual release of natural gas into the atmosphere is **not quantified in table 13** as it states to be.  Table 13 only lists **construction emissions**.

The Commission should require a full Environmental Impact Study with the inclusion of the potential impacts on residential cisterns, wells and septic systems in the project area of Station 203 located in Chesterfield Township, Burlington County, New Jersey, and perform a careful review and verify that the proposed project can operate as designed without the need for the other projects. The sum of the emissions associated with the complete system needs to be quantified and outline within the full Environmental Impact Study.  In addition, the acceptable limits of emissions are not regulated low enough.  FERC and EPA need to acknowledge the absolute and confirmed health impacts to local residents forced to live near these compressor stations, and place the public health above all else. I believe this will result in the ‘No-Action Alternative’ proposed in the EA Section D, 2.0.

Very truly yours,

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