

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Tennessee Gas Pipeline Company, LLC)
Orion Pipeline Project)**

Docket No. CP16-4-000

MOTION FOR LEAVE TO INTERVENE

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 385.214 (2007), Maya van Rossum, the Delaware Riverkeeper, files this motion to intervene in this proceeding.

On October 9, 2015, the Tennessee Gas Pipeline Company, LLC ("TGP") filed its application under § 7 of the Natural Gas Act, 15 U.S.C. § 717f, and § 157 of FERC's regulations, 18 C.F.R. § 157.1 *et seq.*, for the proposed Orion Project ("Project"), FERC Docket No. CP 6-14-000. TGP states that the proposed Project is a 13 mile pipeline project proposed for Wayne and Pike Counties, PA.

I. COMMUNICATIONS AND SERVICE

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individual:

Maya K. van Rossum, the Delaware Riverkeeper
Delaware Riverkeeper Network
925 Canal Street, Suite 3701
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II. INTEREST OF PETITIONER

In my role as the Delaware Riverkeeper, I, Maya van Rossum, advocate for the protection and restoration of the ecological, recreational, commercial and aesthetic qualities of the Delaware River and its tributaries, ecosystems, and habitats. I have served in this independent advocacy role and as the leader of the Delaware Riverkeeper Network since 1996. Prior to my appointment as the Delaware Riverkeeper, I worked for two years as the Executive Director of DRN.

The Delaware Riverkeeper Network is a non-profit organization established in 1988 to protect and restore the Delaware River, its associated watershed, tributaries, and habitats. This area includes 13,539 square miles, draining parts of New Jersey, New York, Pennsylvania and Delaware, and it is within this region that a portion of the Project's construction activity will take place.

In my capacity as the Delaware Riverkeeper, as a member of the Delaware Riverkeeper Network, and as a private citizen I frequently enjoy the nontidal Delaware River, its tributaries, and watershed including those areas that will be impacted by the proposed Orion Pipeline project for kayaking, canoeing, birding, nature viewing, nature hikes, and for other recreational activities. I undertake these activities individually, as well as with friends, family, colleagues and members and supporters of the Delaware Riverkeeper Network.

In my role as the Delaware Riverkeeper and as a private individual concerned about the health of our environment, I have advocated for species and habitats that will be impacted by the Orion pipeline were it allowed to be constructed including, wetlands, streams, Bats, and Bald Eagle, just to name a few.

I frequently talk about the impacts of pipelines and am concerned about the impacts the Orion project would have on water quality, forested ecosystems, wetlands, healthy soils, healthy plant and animal populations of the Delaware River watershed, stormwater runoff, healthy stream and River flows, and the aesthetic and recreational beauty of the many habitats, streams and main stem River that

would be impacted.

It is in my personal and professional interest that I take part in this proceeding as a full participant.

III. CONCLUSION

Wherefore, I, Maya van Rossum, the Delaware Riverkeeper, respectfully requests that the Commission to grant its Motion to Intervene as a party with full rights to participate in all further proceedings.

Respectfully submitted,

/s/ Maya K. van Rossum

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