



September 22, 2021

Pennsylvania Department of Environmental Protection
Regional Permit Coordination Office
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Submitted via Email

Re: Request for Public Hearings & Extension of Public Comment Period for Chapter 105, Chapter 102 E&S Applications and Section 401 Certification - Transcontinental Gas Pipe Line Company, REAE (FERC Docket No. CP21-94-000) – Noticed in PA Bulletin

To whom it may concern:

The Delaware Riverkeeper Network (“DRN”) is providing the following preliminary comments and would object to these permits being issued due to the impacts and threats that fracked natural gas is causing to the climate, in the shale fields, in Pennsylvania’s community and known health impacts where drilling is occurring, in our waterbodies and impacts to Pennsylvania’s air, forests, and public lands. If permits are being considered, DRN requests at least a 90-day extension of public comment to be considered by the Pennsylvania Dept of Environmental Protection (DEP) as it reviews Transco’s proposed Regional Access Expansion (“REAE Project”), a segmented natural gas pipeline project of the larger Transco line that has already inflicted additional harm from other recent projects like the Transco Leidy Southeast Line (Franklin Loop). We would kindly request that the DEP makes it known early in this short 30-day comment period if an extension will be granted so Commenters can plan accordingly.

DRN provides several reasons we believe this extension is warranted below. DRN also requests that the DEP hold several public hearings along the route and virtually (due to COVID concerns), to ensure that impacted communities in Pennsylvania have the opportunity to comment on a pipeline that encompasses parts of at least six Pennsylvania counties. It’s important to note that this Transco REAE Project also includes NJ project segments which should be considered in light of recent NJ protections and rejections of pipeline applications and practices.

In its application, Transco proposes to:

- (1) Construct 22.3 miles of 30-inch diameter pipeline in Luzerne County, Pennsylvania;
- (2) construct 13.8 miles of 42-inch-diameter pipeline in Monroe County, Pennsylvania;
- (3) construct the new 11,107 hp Compressor Station 201 in Gloucester County, New Jersey;
- (4) construct an additional 15,800 hp at its existing Compressor Station 505 in Somerset County, New Jersey;
- (5) construct an additional 46,742 hp at its existing Compressor Station 515 in Luzerne County, Pennsylvania;
- (6) increase the certificated station compression by 5,000 hp at its existing Compressor Station 195 in York County, Pennsylvania;
- (7) modify its existing Compressor Station 200 in Chester County, Pennsylvania;
- (8) increase the certificated station compression by 4,100 hp at its existing Compressor Station 207 in Middlesex County, New Jersey; and
- (9) additional modifications to tie-ins, regulators, and delivery meter stations in Pennsylvania, New Jersey, and Maryland.

At least a 90-day extension is warranted with a series of public hearings adequately advertised in advance and offered because:

- The Transco REAE Project is expansive in scope with abundant proposed waterbody crossings and cuts this pipeline would warrant. On quick review of the 401 application the aquatic resource table alone appears to propose to impact at least 114 Exceptional value (EV) wetlands and 37 High Quality (HQ) streams in Pennsylvania. Yet the Compensatory Mitigation Plan highlights different waterbody impacts and is conflicting. For example, the Plan notes, "Construction of the Project will result in temporary impacts to one hundred and eight PEM, PSS and PFO wetlands. Permanent functional conversion impacts (PFO/PSS to PEM) wetlands located within the proposed maintained pipeline ROW will occur to 39 wetlands, for a total of 1.67 acres. Temporary functional conversion impacts of wetlands located within the temporary workspace will occur to 47 wetlands, for a total of 3.47 acres." The public needs time to review and digest and cross check this information to ensure a complete application and it would appear already the applications are not complete or correct in the first place despite the Dept issuing several deficiency letters to Transco throughout this process;
- DRN lauds the DEP for not deciding or issuing the Section 401 certification before evaluating and either denying or approving the Chapter 105 and Chapter 102 applications before it, albeit we are unsure if the applications are truly complete at this time. However, because of the extensive nature of all three regulatory applications that involve vast areas of the state with many waterbody encroachments and steep slope disturbances, more time beyond 30 days is sorely needed.
- No kmz or shape files appear to be included on the pipeline portal to assist the public in review of these expansive applications despite multiple requests for

multiple pipeline projects over the years for the applicant and agency to provide this electronic information to aid thorough public and agency review;

- The PennEast pipeline which is another fracked gas pipeline project that is proposed has been experiencing many delays, community resistance, and rejected water quality permits in New Jersey. Despite a Supreme court decision in June 2021 against New Jersey that was standing up to protect its public preserved lands from threats like pipelines, the PennEast pipeline announced just today that it was withdrawing requests to seize NJ public lands to build its pipeline after all. Would it not be prudent for the DEP to hold off in starting this review of the PA portions of the project and wasting finite staff time, resources and tax payer dollars until this other pipeline process plays out with the Penneast pipeline? Several years ago the Governor held pipeline meetings to encourage a more thorough evaluation and regional pipeline planning to avoid overbuilding of pipelines and redundant pipeline cuts and paths. Holding off until more is known about the fate of the PennEast pipeline would also assist in not wasting finite agency staff time reviewing projects that may never come to fruition.
- Williams/Transco's Atlantic Sunrise Pipeline (ASP) is yet another north to south 186-mile greenfield pipeline that cut across the state of Pennsylvania west of the proposed line in 2017 and began running natural gas October 6, 2018. In fact, at that time communities opposing this line called it the "shortcut" for the already existing Transco multi-line to the east that is part of the proposed Transco REAE. Already this greenfield ASP pipeline has been expanded and not too many years ago a segment near the proposed REAE was upgraded with the Transco Leidy Line (Franklin Loop). How many more pipeline expansions does Transco really need and how much more harm can Pennsylvania communities afford from the overbuilding of pipelines to possibly export gas to the highest bidder using harmful and climate exacerbating LNG?
- There is also a long hard ban on fracking in the Delaware River Basin (Basin) by the DRBC that has finally come to fruition after community resistance since 2010 – this ban prohibits slickwater hydraulic fracking wells in the Basin – this ban should also put into question why yet another Transco pipe needs expansion at this time.
- To DRN's knowledge, the Transco REAE has not yet developed its EIS or EA for FERC. DRN would argue that an EIS is critical for the FERC process and an EA would not suffice. Again, pushing the PA process and public comment period along when these federal documents are not yet out for comment may be pre-empting a project that may never come on line. What is the harm in waiting?

Thank you for your time and consideration to reject or delay consideration of this new pipeline project outright or for an extension request of at least 90 days with multiple public hearings with adequate advertisement in advance for the public to attend and provide thorough public review and comment. My Director of Monitoring, Faith Zerbe can be

reached at 215-369-1188 ext. 110 or faith@delawariverkeeper.org if you have additional questions or information pertaining to an extension of comment and as indicated above we would kindly request that news earlier than later for better planning.

Maya K. van Rossum



the Delaware Riverkeeper
Delaware Riverkeeper Network