



September 7, 2017

Pennsylvania Dept. of Environmental Protection
Northeast Region
2 Public Square
Wilkes Barre, PA 18701-1915

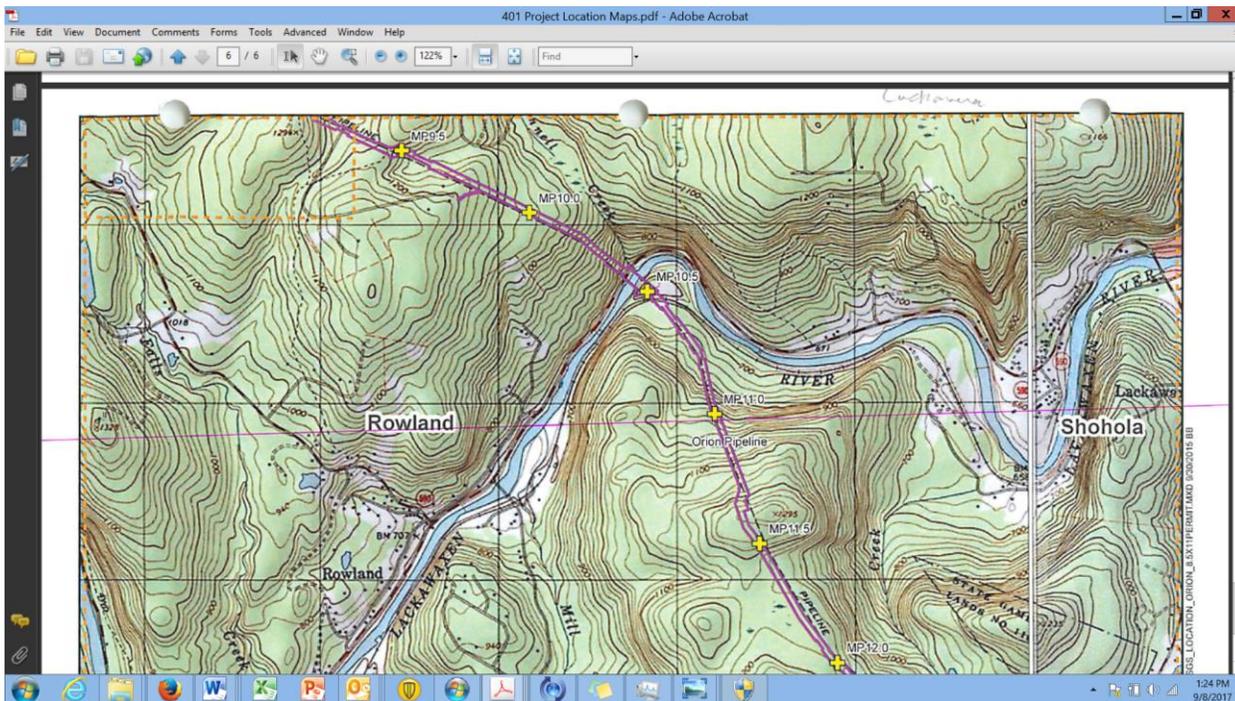
Re: Tennessee Gas Orion Pipeline – Failing BMPs Observed and HDD analysis and Geologic Studies for The Lackawaxen River Need Public Review in light of recent Mariner 2 HDD Debacles

To whom it concerns:

On September 3, 2017, Delaware Riverkeeper Network (DRN) conducted monitoring off the Rte. 590 road crossing and at the Lackawaxen River for the Tennessee Gas Pipeline (TGP) Orion pipeline segment currently under construction that was given FERC certification Feb 2, 2017 (Docket CP16-4-000) for TGP to construct 12.9 miles of pipeline loop, as well as appurtenant and auxiliary facilities, along on its 300 Line in Pennsylvania. DRN received a call from the community that TGP is seeking to have a variance granted to now horizontal directional drill (HDD) under the Lackawaxen River. DRN has concerns about conditions observed on September 3rd in way of inadequate BMPs and sediment entering a wetland as well as concerns regarding the evidence and analysis TGP is or is not undergoing or has undergone to ensure HDD will be a viable and safe crossing option at this location. We are unclear because if this crossing method had been available in 2011, why was it not employed at that time - due to the steep slopes and nature of this high quality river.

As DEP knows, this same ROW and river location was open cut by the TGP 300 upgrade segment (CP09-444-000) in 2011 with multiple problems and violations cited by the PCCD at that time for this location along the Right-of-Way (ROW). A pollution report by Delaware Riverkeeper Network was submitted to the PCCD on March 8, 2012 (attached) in this same crossing location for similar releases of sediment pollution into wetlands that are occurring again now with the Orion Pipeline. There was community resistance at that time of the TGP 300 upgrade for an open trench cut being approved for multiple reasons: the Lackawaxen River was DCNR's River of the Year in 2010 with large canoe trips planned passing by the proposed pipeline cut; this area of the River is a popular Pike County hotspot for canoeing and fishing as well as bald eagle watching and other outdoor recreation; and the Lackawaxen is being considered for Exceptional Value (EV) designation and currently has high quality (HQ) designation) from a redesignation petition submitted to the DEP by the Delaware Riverkeeper Network in 2011.

DELAWARE RIVERKEEPER NETWORK
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Location of the Orion pipeline cut crossing the Lackawaxen River – Map from the Chapter 105 application – Note steep slopes that often mean when clear cut – sediment enters downstream waterbodies and wetlands.

At that time and before the open cut was permitted in 2011 for TGP 300 segment – with subsequent violations filed by Pike County Conservation District (PCCD) from the open cut on the steep slope - it is DRN’s understanding that TGP claimed the geology was not indicative to HDD under the Lackawaxen River. So now it is also unclear to DRN how the geology may be indicative to HDD at this time for Orion? It is also unclear if HDD was a feasible alternative for Orion and due to the substantial violations during TGP 300, why HDD was not required of the Lackawaxen River crossing for its Orion Project and for its prior TGP 300 line upgrade? TGP’s Section 401 application (only available to DRN through a FOIA request as there is no Orion pipeline documents on the DEP pipeline portal available for the public) notes that a site specific crossing plan was being developed for the Lackawaxen River crossing (estimated to be 250 feet wide) but no further details are evident in the 401 application. Now, if HDD occurs, it is important to note that already cuts and impacts have taken place unnecessarily to the banks that could have been avoided if indeed HDD was a viable alternative to an open trench cut from the very start of these segmented and repeated pipeline cuts.

DRN believes that at a minimum more oversight and scrutiny is needed and all questions need to be openly provided by TGP for the public and the agencies to thoroughly evaluate the geology and conditions at the Lackawaxen River site before any variance is considered. TGP should be required to provide a thorough analysis and geological study of this region before any additional work is conducted and it should be provided on the DEP pipeline portal and the FERC docket for public review. The rationale of the HDD request and the history of this pipeline cut pre-Orion, as well as back when this line was first built, is not clear in the brief variance request by TGP nor is it clear in the geological report for the FERC EA. Furthermore, recent HDD debacles, bentonite releases and water supply issues along the Mariner East 2 pipeline in Pennsylvania clearly warrants more scrutiny here for the Pike County community and

Lackawaxen River crossing before any variances are granted. After all, much of the harm has already been inflicted to the waterbody these last several months during failed attempts by TGP at crossing the river using another open cut technique.

In the meantime while extensive analysis should be required of TGP and provided to the public and agencies to ensure bentonite releases and other issues do not occur if HDD is granted, the construction conditions on the ground in this area are in need of better BMP maintenance and at least short-term stabilization and restoration since TGP has opened up the riparian corridor and steep slopes for this project.

During DRN site visits on Sept 3, 2017 we raise some of the concerns at this location at MP 10.39 that were observed.

Problems, Off ROW occurrences, and maintenance concerns observed Sept 3, 2017 include:

-PEM Wetland 39a at MP 10.39 of the Orion Project has over 3 inches of fine sediments from runoff from the steep denuded slope and bank. According to the wetland tables, this crossing is said to impact 16 feet of this wetland; however it is clear that sediment fines are both along the ROW and outside of the ROW footprint for this wetland that span a greater width than 16 feet. This is an off ROW occurrence of sediment discharging into the wetland at this location. In addition, the wetland has been seeded with grass and lined with straw. General permit conditions usually restricts seeding or mulch or straw placed in wetlands while this wetland has both in addition to the sediment fines currently located throughout the wetland area within and outside of the ROW footprint. At the time of the field visit there was additional turbid water runoff entering and standing in the wetland from the construction site but the observations indicate that the bulk of the 3 inch sediment layer was likely deposited during earlier rain events based on the grass growing in some areas of the sediment deposits. DRN did not do a file review to see if PCCD inspections have cited this violation in the subsequent months.



Note grass seed and straw in wetland PEM 39a. adjacent timber ROW crossing. Note turbid water and sediment under straw. (photos taken 9/3/17)



Note sediment fines behind compost filter sock by Lackawaxen River requiring maintenance. Note sand fines entering Lackawaxen River and darker fines also evident in River. Note lack of straw or stabilization along bare bank between River and compost filter sock.



Overview of crossing area – note wetlands under timber crossing. Off ROW sediment fines were observed throughout the length of the wetland and downstream to the right of photo, far off ROW. A ruler was used to measure 3 inches of fines to the east of the photo frame.



Note sparse straw on large soil pile on opposite bank. Note raw bank in foreground. With remnants of Hurricane Harvey anticipated straw mulch on raw banks would have been appropriate BMP at minimum for holiday weekend, especially in light of PCCD NOV issued Aug 31, 2017. With binoculars at time of inspection, mile a minute weed is now present in addition to the Japanese knotweed that colonized this area after TGP 300 upgrade in 2011 on the far bank and riparian area.



Two photos above show conditions during the subsequent TGP 300 upgrade project in 2011 at the same location now being cut in 2017.

While conducting field visits, DRN observed an EI arrived at another ROW location along Wescalong Road. DRN cross-referenced the TGP weekly construction report for August 28, 2017 to Sept 3, 2017 that was submitted on the FERC docket on Sept 6, 2017. According to the TGP weekly construction report, the

EI did not observe any problems at the Lackawaxen crossing location. PCCD's Chris Ingulli inspected various ROW locations along the pipeline route on August 30, 2017 and an NOV was issued to TGP for multiple problems that was attached to the FERC filing on Sept 6, 2017. The NOV was provided to TGP on August 31, 2017. It is important to note the conditions documented at the Lackawaxen Crossing were still unresolved as of Sept 3, 2017 despite the NOV by the PCCD on August 31 and the anticipated rains from Hurricane Harvey expected over the holiday weekend. DRN has additional photos of conditions at various other pipeline locations in the vicinity that are available to the agencies upon request that include observations on Sept 3, 2017. DRN did not cross reference additional site visit photos with the PCCD NOV report at this time due to time constraints. In addition to our other requests above, DRN asks that DEP provide and add to the pipeline portal an Orion portal so that information is more readily available for this pipeline as is the case with other pipelines currently on the portal. The Lackawaxen Crossing plan was not found on the FERC Docket from a search dated 9/8/2017.

Thank you for your time.

Sincerely,



Faith Zerbe
Director of Monitoring
Delaware Riverkeeper Network

cc: National Park Service
Sally Corrigan, Pike County Conservation District
FERC
DEP Southeast Region

September 6, 2017

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Tennessee Gas Pipeline Company, L.L.C., Docket No. CP16-4-000
Orion Project
Weekly Status Report for August 28, 2017 through September 3, 2017

Dear Ms. Bose:

Pursuant to Environmental Condition No. 7 of the Commission's Order Issuing Certificate,¹ Tennessee Gas Pipeline Company, L.L.C. ("Tennessee") is filing with the Federal Energy Regulatory Commission ("Commission") the enclosed status report and attachments for the above-referenced project.

In accordance with the Commission's filing requirements, Tennessee is submitting this filing with the Commission's Secretary through the eFiling system. Tennessee is also providing copies of this filing to the Office of Energy Projects. A copy of this filing is being served on all parties of record.

Respectfully submitted,

TENNESSEE GAS PIPELINE COMPANY, L.L.C.

By: /s/ Ben J. Carranza
Ben J. Carranza, P.E.
Director of Regulatory
(713) 420-5535

Attachments

cc: Keith Rodgers (Commission Staff)
Troy Enright (NRG)
Service List

¹ Tennessee Gas Pipeline Company, L.L.C., 158 FERC ¶ 61,110 (2017).

Orion Project (“Project”), Docket No. CP16-4-000
Weekly Status Report
Reporting Period: August 28, 2017 through September 3, 2017

A. Update on efforts to obtain necessary federal authorizations:

All federal authorizations have been obtained.

B. Construction status of the Project:

Work completed:

Construction Loops:

- H&M continues right-of-way activities, including grading, road bores, trenching, lowering-in, backfilling and rough cleanup. The contractor also continues the bore at the cultural site.
- Environmental inspectors (EI) continue to inspect the project activities daily, complete daily reports, and train new employees.
- Timber rattlesnake monitors continue to clear areas ahead of construction crews, where appropriate. Monitors file daily reports summarizing data suggested by the PA Fish and Boat Commission. Rattlesnake monitors are relocating snakes to suitable habitat outside the limits of disturbance, when necessary.
- Wetland and waterbody crossings continue. Wetland and waterbody crossing schedules are being provided to the agencies.

Modifications to Compressor Station 323

- Work at the station nears completion.
- Daily EI inspections and environmental training continues.

Work planned:

Construction Loops:

- Tennessee EIs will continue to monitor the right-of-way for compliance with the FERC Certificate as well as other Federal and state permits. Tennessee EIs will continue to train new employees, as necessary.
- H&M to continue right-of-way activities including grading, road bores, trenching, lowering-in, backfilling and rough cleanup.
- Timber rattlesnake monitoring will continue.

Modifications to Compressor Station 323

- Work at the station is likely to conclude this week.

Schedule changes affecting stream crossings or other environmentally sensitive areas in the reporting period:

No schedule changes are anticipated in the reporting period.

C. Problems encountered and instances of non-compliance observed by the Environmental Inspector during the reporting period:

Orion Project (“Project”), Docket No. CP16-4-000
Weekly Status Report
Reporting Period: August 28, 2017 through September 3, 2017

A self-reported problem area was issued on August 28, 2017 for improper dewatering activities leading to sediment laden water runoff entering stream S8a near milepost 2.43. The trench was being dewatered during the crossing of stream S9a near milepost 2.25 into a filter bag placed within a hay bale structure lined with geotextile fabric and surrounded by a compost filter sock on the downgradient side. Discolored water left the dewatering controls and entered stream S8a, which dispersed approximately 100 feet downstream from the point of entry to the stream.

D. Corrective actions taken in response to each instance of non-compliance, cost of corrective action:

In response to the self-reported dewatering problem area, Tennessee immediately stopped dewatering activities at the location, evaluated the dewatering structure and determined flow rate of the discharge was likely the cause of the problem area. The contractor was advised of the likely cause of the problem and advised to slow dewatering rates. Dewatering was directed into an adjacent structure at a slower rate to complete the required dewatering activity. Wayne County Conservation District was advised of the improper dewatering activities on August 28, 2017.

E. Effectiveness of all corrective actions implemented:

The corrective actions taken were effective in addressing this self-reported problem area.

F. Description of any landowner/resident complaints which may relate to compliance with requirements of this Order, and measures taken to satisfy their concerns:

No landowner/resident complaints were received during this reporting period.

G. Copies of any correspondence received by Tennessee from other federal, state, or local permitting agencies concerning instances of non-compliance and Tennessee’s response:

On August 30, 2017, the FERC PM and Compliance Manager, conducted an inspection of the construction right-of-way, and issued a problem area report (attached). The problem area was between stations 228+00 and 231+00, for missing survey stakes and wetland spoil outside the limits of disturbance. The problem area was corrected on August 30 and August 31, 2017, by retrieving the spoil from outside the limits of disturbance and installing new survey stakes along the edge of the right-of-way.

On August 30, 2017, the Pike County Conservation District inspected the right-of-way and issued a noncompliance report on August 31, 2017. The noncompliance report included the following observations in association with a waterbar and end treatments involving filter bags outside a hay bale structure (attached).

- Failure to implement effective E&S Best Management Practices
- Failure to maintain effective E&S BMPs

Proper placement of dewatering filter bags away from waterbars and end treatments was reviewed with the contractor on August 30, 2017 as well as avoiding stacking filter bags on top of one another.



EARTH DISTURBANCE INSPECTION REPORT

Project Name Orion Project Inspection Date 8/30/2017 Inspection Time 11:00 – 3:00 PM
 Weather Conditions Sunny 70 - 80 deg Total Project Area 799.05 Ac.
 Location STA 226+00–243+00/258+00–284+00/465+00- 477+50/548+00-549+50 Total Disturbed Area 267.80 Ac.
 Municipality Lackawaxen Township County Pike
 Receiving Water(s) See Site Description Designated/Existing Use See Site Description

Responsible Party(s) Tennessee Gas Pipeline Company, LLC
 (name & address) 1001 Louisiana Street, Suite 1000
Houston, TX 77002
 Phone (713) 420-2600 () _____

Site Representative (name) Matt Stetter Inspector (name) Chris Ingulli
 (title) Tetra Tech (title) Resource Conservationist

Type of Inspection (check only one) Photographs Taken Yes No
 Routine complete Routine partial Follow-up Complaint Final

Site Description & Observations:

Receiving Waters: UNT to Rattlesnake Creek (HQ-CWF, MF), Tink Wig Creek (HQ-CWF, MF), UNT to Tink Wig Creek (HQ-CWF, MF), UNT to Westcolang Creek (HQ-CWF, MF), UNT to Wests Falls Creek (HQ-CWF, MF).

Chris Ingulli (Pike County Conservation District "District") completed an inspection of the Orion Project at the following locations: Stations 226+00 – 251+00 (W-19a, W-24a, W-23a, S-11a, S-12a, S-15a), Stations 258+00 – 284+00 (W-22a, W033, W0034), Stations 465+00 – 477+50 (W-28b), and Stations 548+00 – 549+50 (W-39a, S-22a).

Stations (STA) 226+00 – 251+00: Sediment not yet removed from S-12a channel outside of the Limits of Disturbance. W-19a, S-11a, and S-12a (STA 227+50 – 231+00) pipe installed backfilling/rough grading ongoing during inspection. Backfilling of W-19a between STA 232+50 – 233+50 ongoing during inspection. Pumped water filter bag location being used for dewatering of trench at STA 239+50 relocated to approximate STA 243+75 southwestern edge of Right of Way (ROW) during the inspection. Five pumped water filter bags noted at the end of a waterbar at approximate STA 250+50 (southeast of W-23a). Two filter bags noted exceeding ½ full of sediment with several bags being stacked on top of the others.

Stations (STA) 258+00 – 284+00: Pipe installed and backfilled throughout section. W-22a temporarily stabilized with seed and mulch; remainder of ROW has not been stabilized yet.

Continued on page 3 of 4 .

	Permit and Plan Requirements	Type of Activity (check as many as appropriate)
Y N		
<input checked="" type="checkbox"/> <input type="checkbox"/>	Written Erosion & Sediment Plan required	<input type="checkbox"/> Other: _____
<input checked="" type="checkbox"/> <input type="checkbox"/>	Written Post Construction Stormwater Management Plan required	<input type="checkbox"/> Pub. Road Constr./Maint. (PRC) <input type="checkbox"/> Pvt. Road/Residence (PRRS)
<input type="checkbox"/> <input checked="" type="checkbox"/>	Erosion & Sediment Plan requested	<input type="checkbox"/> Res. Subdivision (RSBD) <input type="checkbox"/> Comm./Indust. Dev. (CMIN)
<input type="checkbox"/> <input checked="" type="checkbox"/>	Post Construction Stormwater Management Plan requested	<input type="checkbox"/> Govmt. Facilities (GOV) <input type="checkbox"/> Recreation Facilities (RECF)
<input type="checkbox"/> <input checked="" type="checkbox"/>	E&S Permit required <input checked="" type="checkbox"/> ESCGP Permit Required	<input type="checkbox"/> Utilities Facilities (UTL) <input type="checkbox"/> Agricul. Activities (AGA)
<input type="checkbox"/> <input checked="" type="checkbox"/>	NPDES Permit required	<input type="checkbox"/> Sewer/Water Systems (SWS) <input checked="" type="checkbox"/> Pipeline (PL)
	<input type="checkbox"/> Phased Constr. <input checked="" type="checkbox"/> Non-Phased Constr.	<input type="checkbox"/> Remediation/Restoration (RRES) <input type="checkbox"/> Silviculture (SILV)
	Permit #: <u>ESG02000160001(1)</u> Exp. Date: <u>July 9, 2022</u>	



EARTH DISTURBANCE INSPECTION REPORT

Project Name Orion Project **Inspection Date** 8/30/2017 **Inspection Time** 11:00 – 3:00 PM

Inspection Findings

Reference

- No violations observed at this time: (N/A)
- a. Failure to develop a written Erosion and Sediment (E&S) Plan. (102.4)
 - b. Failure to have an E&S Plan available onsite. (102.4)
 - c. Failure to submit E&S Plan as requested. (102.4)
 - d. Failure to implement effective E&S Best Management Practices (BMPs). (102.4)
 - e. Failure to maintain effective E&S BMPs. (102.4)
 - f. Failure to use Antidegradation Best Available Combination of Technologies (ABACT) BMPs discharges to High Quality or Exceptional Value Waters. (102.4)
 - g. Failure to obtain an NPDES Permit for Stormwater Discharges Associated with Construction Activities. (102.5)
 - h. Failure to obtain an E&S Permit. (102.5)
 - i. Failure to prepare and implement a Preparedness, Prevention, and Contingency (PPC) Plan. (102.5)
 - j. Failure to submit Notice of Termination (NOT). (102.7)
 - k. Failure to develop written Post Construction Stormwater Management (PCSM)/Restoration Plan. (102.8)
 - l. Failure to have PCSM/Restoration Plan available onsite. (102.8)
 - m. Failure to submit PCSM/Restoration Plan as requested. (102.8)
 - n. Failure to implement effective PCSM BMPs. (102.8)
 - o. Failure to maintain effective PCSM BMPs. (102.8)
 - p. Failure to perform reporting and recordkeeping as required. (102.8)
 - q. Failure to implement riparian buffer or riparian forest buffer. (102.14)
 - r. Failure to meet regulatory requirements for riparian forest buffer. (102.14)
 - s. Failure to provide temporary stabilization of the earth disturbance site. (102.22)
 - t. Failure to provide permanent stabilization of the earth disturbance site. (102.22)
 - u. Failure to comply with permit conditions. (402 CSL)
 - v. Sediment or other pollutant was discharged into waters of the Commonwealth. (401 CSL)
 - w. Site conditions present a potential for pollution to waters of the Commonwealth. (402 CSL)
 - x. Failure to comply with a Department Order. (402, 611 CSL)
 - y. Failure to comply with PCSM long-term operation and maintenance requirements. (102.8)
 - z. Failure to conduct a preconstruction meeting. (102.5)
 - aa. Failure to provide proof of consultation with the Pennsylvania Natural Heritage Program regarding the presence of a State or Federal threatened or endangered species on a project site requiring a Chapter 102 permit. (102.6)
 - bb. Failure to withhold a building or other permit or approval from those proposing or conducting earth disturbance activities, which required Department permit, until the Department or conservation district has approved/acknowledged the Chapter 102 permit. (102.43)
- Inspection of this project has revealed site conditions which constitute violations of 25 Pa. Code Chapters 92 and/or 102 and the Clean Streams Law, the act of June 22, 1937, P.L. 1987, 35 P.S. §691.1 et seq.**

Additional information regarding these violations can be found on the last page.



EARTH DISTURBANCE INSPECTION REPORT

Project Name Orion Project Inspection Date 8/30/2017 Inspection Time 11:00 – 3:00 PM

Continuation Sheet

Site Description & Observations: (Continued from Page 1 of 4):

Stations 465+00 – 477+50: Trench excavation ongoing through section with the exception of W-28b (STA 472+00 – 473+75).

Stations 548+00 – 549+50: Restoration efforts for W-39a ongoing; no additional work completed along western bank of S-22a (STA 594+00 – 594+75); section not yet stabilized.

Current Violations:

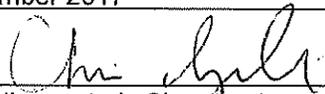
1. Failure to implement effective E&S Best Management Practices (BMPs). (d)
 - a. Pumped Water Filter Bags at approx. STA 250+50 located at the end of a waterbar and stacked on top of other filter bags.
 - b. Pumped Water Filter Bags placed at the end of a waterbar at approx. STA 250+50; no sump end treatment provided for waterbar.
2. Failure to maintain effective E&S BMPs. (e)
 - a. Pumped Water Filter Bags at approx. STA 250+50 noted exceeding 1/2 full of sediment.
3. Site Conditions present a potential for pollution to waters of the Commonwealth. (w)

Compliance Assistance Measures:

The Pike County Conservation District Requests the following:

1. The approved E&S Control Plan, Post Construction Stormwater/Site Restoration Plan, and all conditions of the ESCGP-2 permit be implemented onsite.
2. All onsite BMPs be implemented and maintained according to the details provided in the approved E&S Control Plan.

Follow-up Inspection will occur on or about (date) September 2017

Mailed via 1 st Class Mail to Responsible Parties	<u>8/31/2017</u>		<u>8/31/2017</u>
(Signature of Site Representative)	(Date)	(Inspector's Signature)	(Date)

The Site Representatives' signature acknowledges that they have read the report and received a copy and that they were given an opportunity to discuss it with the inspector. The signature does not necessarily mean the signee agrees with the report.

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WATERSHED MANAGEMENT

This report is official notification that a representative of the Department of Environmental Protection has conducted an inspection of your earth disturbance activity to determine compliance with Title 25, Chapter 92, National Pollutant Discharge Elimination System, Title 25, Chapter 102, Erosion and Sediment Control, and the Pennsylvania Clean Streams Law. This representative may be an employee of the local County Conservation District, which by delegation agreement with the Department of Environmental Protection, is authorized to investigate complaints, inspect earth disturbance activities and conduct compliance actions. Any violations observed by the Department/Conservation District have been noted on this report form and constitute unlawful conduct as defined in Section 611 of the Clean Streams Law.

There will be no written confirmation of those violations from the Department. Failure to take corrective actions to resolve the violations may result in administrative, civil and/or criminal penalties being instituted by the Department of Environmental Protection as defined in Section 602 of the Clean Streams Law of Pennsylvania. The Clean Streams Law provides for up to \$10,000 per day in civil penalties, up to \$10,000 in summary criminal penalties, and up to \$25,000 in misdemeanor criminal penalties for each violation.

This report does not constitute an Order or appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

For further information or assistance please contact:

Pike County Conservation District
556 Route 402
Hawley, PA 18428
(570)226-8220 (t)
(570)226-8222 (f)
www.pikeconservation.org

cc: Lackawaxen Township Supervisors
Mike Letson, Michael_Letson@kindermorgan.com
David Langlois, dmattlang23@aol.com
Tim McKellar, McKellar@KinderMorgan.com
Matt Stetter, Matt.Stetter@tetrattech.com

FEDERAL ENERGY REGULATORY COMMISSION
 OFFICE OF ENERGY PROJECTS
 WASHINGTON, D.C. 20426

Notification of Required Corrective Action or Response

Company: Tennessee Gas Docket No.: CP16-4

Project: Orion CP16-4

Our environmental compliance inspection identified the following items that require corrective action within the indicated timeframes. Report on the status of corrective measures in **your next required weekly, biweekly, or quarterly report**. File all responses with the Secretary of the Federal Energy Regulatory Commission.

The following noncompliance(s) require your immediate attention.

Due to the nature/extent of noncompliance, file a response **within 5 working days** of the date of this notification. For each item below, describe how it occurred; how and when each occurrence was corrected (include photo documentation) or a precise schedule for correction; and how your company will ensure that similar occurrences will be avoided.

Date	Location (MP, Station No., etc.)	NONCOMPLIANCE(S)	Correct Within	
			24 hrs	Other

The following problem area(s) require correction. Failure to correct these items may result in a noncompliance.

Date	Location (MP, Station No., etc.)	Problem Area(s)	Correct Within	
			24 hrs	Other
8/29/17	228-231	Missing stakes for LOD & mud/spills outside LOD	✓	

J. Keith Rodgers 8/29/17 J. Keith Rodgers
 FEREC Representative / Contractor (signature / date) (print name)
Mike Letson 8/29/17 Mike Letson
 Received by: Company Representative (signature / date) (print name)