



February 17, 2012

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

RE: Philadelphia Lateral Project, Texas Eastern Transmission, Federal Energy Regulatory Commission (FERC), Environmental Assessment, Docket #CP11-508.

Dear Secretary Bose:

The Delaware Riverkeeper Network [DRN] has reviewed the Environmental Assessment [EA] for the Philadelphia Lateral Project submitted by the Federal Energy Regulatory Commission [FERC]. We offer these comments for consideration by the agency.

Future Expansion

In section A(1) of Texas Eastern Transmission's EA it states, "[t]he applicant has not identified plans for future expansion of its system or abandonment of the Project facilities beyond those discussed in this EA." While Texas Eastern has provided data indicating that there may be an individual need for the Philadelphia Lateral Project, DRN has concerns that this project may be one of a series of related upgrades that will be separately filed before, and analyzed by, FERC. This concern is buttressed by the way in which several other pipeline companies have recently conducted their pipeline construction activities in the Northeast. For example, Tennessee Pipeline and Gas Company has submitted three separate pipeline upgrade projects before FERC in a short period of time along the same line (including, the 300 Line Upgrade Project, the Northeast Supply Link Project, and the MPP Project). DRN requests further study by Texas Eastern Transmission to demonstrate that there is no foreseeable future need for upgrade projects along this same line.

Stream Crossing Method

In the EA, Texas Transmission states, "Texas Eastern proposes to cross the two waterbodies associated with the Project using the dam-and-pump method." DRN supports Texas Eastern Transmission's representation that they will conduct a "dry" cut method of stream crossing construction. However, in section C(3) of the EA Texas Eastern has failed to consider the other primary "dry" cut stream crossing technique, the Flume method. In the flume method, the stream is dammed and a culvert is installed in order to install the pipeline. This method should have been analyzed in the EA, as it may have environmental

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benefits beyond the dam-and-pump method. Additionally, in section C(3) the Horizontal Direct Drilling method was summarily dismissed with a conclusory statement that “this alternative would not be environmentally preferable to the Proposed Action.” Yet, no more analysis of this method was provided. A more thorough examination should have been provided in the EA.

Variances

Texas Eastern states in section A(6) that “[d]ue to site limitations such as steep topography, residential areas, and a public park, the temporary construction workspace would be situated less than 50 feet from the waterbodies,” and furthermore, that these conditions will facilitate a need for Texas Eastern to depart from FERC’s Plan and Procedures. Steep slopes in and around a construction area for a pipeline water crossing pose significant problems for erosion and sediment control measures. The EA should have detailed the specific risks that these conditions pose for this project, and the ways in which Texas Eastern plans to mitigate these problems.

DRN requests that FERC require Texas Eastern Transmission to supplement their EA to reflect the issues identified in this comment before the project moves forward.

Thank you for the opportunity to submit these comments.

Respectfully submitted,

/s/ Aaron Stemplewicz

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