

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

Transcontinental Gas Pipe Line Company, LLC            )            Docket No. CP21-94-000  
   )              
   )

**MOTION TO INTERVENE**

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission’s Rules of Practice and Procedure, 18 C.F.R. §§ 385.212 and 385.214, I, Maya K. van Rossum, the Delaware Riverkeeper, file this motion to intervene in this proceeding.

On March 26, 2021, Transcontinental Gas Pipe Line Company, LLC (“Transco”) submitted an abbreviated application for a certificate of public convenience and necessity under section 7(b) and 7(c) of the Natural Gas Act, 15 U.S.C. §§ 717f(b) & (c), and Parts 157 and 284 of FERC’s regulations to construct, modify, operate and maintain its Regional Energy Access Expansion (“REAE Project”), an expansion of Transco’s existing pipeline system. I seek to intervene to protect my interests that will be directly affected by the outcome of the proceeding.

**I. COMMUNICATIONS AND SERVICE**

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

Maya K. van Rossum, the Delaware Riverkeeper  
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## **II. INTEREST OF PETITIONER**

My interests will be directly affected by the outcome of the proceeding and my participation as a party in this docket is in the public interest. My interests and serious concerns about the development of natural gas infrastructure within the Delaware River watershed support my intervention here.

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, its watershed, tributaries, ecosystems, and habitats. I have served in this independent advocacy role and as leader of the Delaware Riverkeeper Network (“DRN”) since 1994. DRN is a membership organization headquartered in Bristol, Pennsylvania, with more than 25,000 members with interests in the health and welfare of the Delaware River and its watershed. As the Delaware Riverkeeper and a member of DRN, I am uniquely qualified to comment on and provide relevant information concerning associated impacts to human health and the environment as a result of the REAE Project.

DRN 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 the REAE Project’s construction activity will take place. Construction, operation and maintenance of the REAE Project, and other present and future pipeline projects impacted by the

outcome of this docket, will have serious, significant and irreparably harmful impacts to the water, forest, wetlands, species, and environmental resources of the Delaware River watershed.

In my role as the Delaware Riverkeeper and as a private individual concerned about the health of our environment, I have been personally and professionally active in seeking endangered species and critical habitat protection of the Atlantic sturgeon, and I have been personally and professionally active in protecting the Delaware River Basin, including the areas to be impacted by the REAE Project. The Delaware River and the Delaware River Basin are home to a number of federal and state listed endangered or threatened species including, but not limited to, the dwarf wedgemussel, Indiana bat, bog turtle, Atlantic sturgeon, shortnose sturgeon, loggerhead and Kemp's ridley sea turtles, and Northeastern bulrush. Migratory birds breed in or migrate through the high-quality riparian corridors of the Basin. The Delaware River and Delaware Bay are also home to dozens of species of commercially and recreationally important fish and shellfish species.

Among many other concerns, I am particularly troubled by the fact that the REAE Project will negatively impact my recreational, aesthetic, ecological and commercial interests, as well as my health and safety. I have an interest in participating in the Commission's regulatory review of projects like the REAE Project because I use the impacted area for recreational, professional, and aesthetic use. I am concerned that the REAE Project's impacts will not be properly addressed in this proceeding.

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

### III. CONCLUSION

For the foregoing reasons, I, Maya van Rossum, the Delaware Riverkeeper, respectfully request that the Commission grant my 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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Dated: April 30, 2021