



September 22, 2016

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

**Re: Docket 16-4 Orion Pipeline EA and Field Reports Related to TGP expansions**

Addendum to DRN Submission to TGP Orion Pipeline Project – CP 16-4-000

Dear Ms. Bose,

In addition to Delaware Riverkeeper Network's (DRN) substantive comment submitted today regarding the TGP Orion Pipeline expansion Environmental Assessment (EA), DRN is submitting as attachments additional data and technical reports and studies to this Docket to be considered by FERC and sister agencies when reviewing the inadequate draft EA for this segmented pipeline project to be installed and expanded, once again, in some of the cleanest streams of Pennsylvania.

DRN notes that supplemental information related to expansion of the same areas of the proposed pipeline includes data that shows:

- Water samples were taken upstream and downstream of the pipeline cut Right of Way along Tennessee Gas Pipeline cuts in Pike County PA in previous pipeline projects conducted in 2011 and 2013. Nitrate concentrations were found to be significantly higher in the downstream pipeline stream samples than above the pipeline cuts. On average, there was a 63% increase. These changes indicate the disturbance from pipeline construction has an impact on the water quality in these high quality headwater streams.<sup>1</sup>
- Stream temperatures were significantly higher in Exceptional Value (EV) streams that were cut across by TGP 300 and TGP NEUP pipeline projects in the recent past – these increases in temperature are great threats to the EV coldwater resources that this pipeline would again cut across
- BMPs and mitigation practices under current state regulations were not effective at avoiding harm to EV and HQ watersheds in Pennsylvania despite typical mitigation and BMP practices being applied by sister agencies

- FERC BMPs were woefully inadequate in ensuring the health of special protection watersheds especially with glacial soils, steep slopes, and largely mature forested and pristine watersheds of the Upper Delaware region that were cut down and impacted by this natural gas pipeline expansion.

Thank you for your time and consideration.



Faith Zerbe  
Monitoring Director  
Delaware Riverkeeper Network

Attachments: Enclosed

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