



Transcontinental's Northeast Supply Link

County in the Delaware River Watershed Where Planned --- Monroe County (Ross Township)

The Transcontinental [Transco] Northeast Supply Link Project is an expansion of Transco's existing pipeline system that will enable Transco to provide natural gas transportation supply interconnections on Transco's Leidy Line in Pennsylvania to Transco's Market Pool in New Jersey and delivery points in New York City. The Project will involve the construction and operation of approximately 13 miles of new 42-inch pipeline looping facilities on Transco's existing mainline; pressure uprating of approximately 27 miles of existing 24-inch, 26-inch, and 36-inch pipeline; a new 25,000 horsepower compressor station; addition of 16,000 horsepower at an existing compressor station; compressor unit modifications at an existing compressor station; and construction or modification of associated underground and aboveground facilities. As part of this project and in the Delaware Watershed, nearly four miles of 42 inch pipe is being proposed to cut through sensitive habitats and woodlands in Monroe County, crossing eight water bodies including 6 streams of the Aquashicola Creek Watershed (a designated High Quality stream) and 2 streams of the Buckwha Creek Watershed and residential areas. Much of the area proposed for the pipeline expansion is in steep slopes and hillsides that include Chestnut Ridge that rises to 1,265 feet. For more detailed maps of the project, click http://www.delawareriverkeeper.org/resources/Reports/Wetland_Delineation_Reports-PA_NJ_Facilities.pdf

The size and scope of the construction activity and stream crossings associated with this project will have a deleterious effect on the water resources of the Delaware River Basin. There are significant concerns related to the cumulative impact that continuous water body crossing pipeline construction activity has on the health and vitality of the Delaware River Basin. In addition to the NEUP, there are at least two other major pipeline upgrade projects (including Texas Eastern's Philadelphia Lateral, and TGP's Northeast Upgrade Project) that are either currently or soon-to-be under construction within the Delaware River Basin. These construction projects will facilitate the further development of new wells, access roads, gathering lines, compressor stations, and other supporting infrastructure, which will further degrade the local environment.

There have also been numerous regulatory compliance failures associated with this type of construction activity. In a recent pipeline upgrade project conducted by Tennessee Gas and Pipeline (TGP), called the 300-Line Upgrade Project, multiple violations were reported by the Conservation Districts in Pike, Wayne, and Susquehanna counties. In Pike County alone numerous Notices of Violations were have been reported, including: 17 instances of dirt and sediment being discharged into water bodies, 7 violations for worksite conditions, and 21 instances of failure to properly institute Best Management Practices for erosion and sediment control. This high frequency of violations demonstrates that there are systemic and continued failures in TGP's compliance with regulatory controls, which suggests improper oversight, and or, inadequate enforcement. In Wayne County, out of 16 inspections conducted by the County Conservation

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District during the 300 Line Extension Project, 15 violations were found. This startling 93% failure rate provides further evidence of systemic compliance failures.

Furthermore, at the federal level, during the 300 Line Extension Project, in 28 out of 38 “Environmental Compliance Monitoring Program Weekly Summary Report[s]” that were provided on Federal Energy Regulatory Commission’s [FERC] website there was at least one recorded incident where construction activity did not come into “compliance with Project specifications, mitigation measures, and applicable FERC-approved Project plans.” Additionally, there were also at least 10 separate instances where an inspector in their “Environmental Compliance Monitoring Program Weekly Summary Report” indicated that a noncompliance report would be filed at a later date, but where the inspector failed to file a noncompliance report with FERC (and no reason was provided for the failure to issue that report in the following week’s report). These 10 separate instances indicate that either FERC has maintained incomplete records for the project, or that there were multiple failures to follow-up on potentially enforceable noncompliance matters by FERC sanctioned environmental inspectors. It is clear that the regulatory system, at both the state and federal level, is not adequately protecting the resources of the watershed.

The Delaware River Basin Commission has the authority to regulate pipeline construction activity if it involves a “significant disturbance of ground cover” affecting water resources. However, up to this point the DRBC has failed to exercise its authority in this arena. In light of the regulatory compliance failures overseen by both the FERC and PADEP, the DRBC should exercise their statutory mandate to regulate pipeline construction activities in order to effectively preserve the natural integrity of the watershed.

DRN is committed to restoring natural balance in the Delaware River and watershed where it has been lost, and ensuring preservation where it still exists. As such, we are actively engaged at the local, state, and federal government levels to ensure that full weight of legal environmental protection laws are brought to bear on all pipeline projects under consideration.