

BALLARD & DRAGAN

ATTORNEYS AT LAW
LIBERTY COURT, SUITE 1200
260 HIGHWAY 202/31 NORTH
FLEMINGTON, NEW JERSEY 08822

Robert A. Ballard, Jr.*
Sharon A. Dragan +

Telephone (908) 806-3171

September 7, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Docket No. CP15-558-000 - Proposed PennEast Pipeline Project -
Draft Environmental Impact Statement

Dear Secretary Bose:

Please accept this correspondence on behalf of Intervenor Alexandria Township, a municipality in Hunterdon County, New Jersey in the above matter with respect to the draft Environmental Impact Statement filed by PennEast Pipeline Company, LLC.

The Alexandria Township Committee, as governing body of Alexandria Township, represents approximately 5,0000 residents. The municipality relies on ground water as its sole source of drinking water and on septic systems as its only method of effluent treatment. The draft environmental impact statement ("DEIS" or "draft EIS") is incomplete and fails to address the following concerns:

A. DEFICIENCIES OF THE DEIS

1) The construction of the pipeline will involve trenching blasting and fracturing of sub-surface shale; this will negatively impact the Township's water quality by the introduction of harmful elements, resulting in both new contamination and the exacerbation of an already-existing arsenic problem. The potential annual cost of remediation resulting from ground-water contamination will be burdensome and clearly prohibitive for Township and its residents. The draft EIS does not analyze this potential cost nor does it specifically discuss these impacts upon the wells or septic systems of the specific properties it will cross or to the Township's general water supply.

2) With respect to comment #1 above, the Township notes that the pipeline would cross a Well Head Protection area within the Township which is one of three located across the proposed pipeline route. Well Head protection reduces the potential for contamination by both public and private parties and results in less treatment and remediation costs utilizing natural means. Such areas merit the highest standard of protection with respect to preventing their potential contamination. The draft EIS does not discuss the impacts to or mitigation of the Well Head protection area which the pipeline will cross within the municipality.

*Also Admitted to New York Bar
+Also Admitted to Pennsylvania Bar

3) As proposed, PennEast's pipeline will cross C-1 streams located within Alexandria Township. However, the draft EIS provides no construction plans or plans for minimizing impacts to riparian buffers, even though such information has been requested by numerous intervenors, NJDEP and FERC.

4) The draft EIS notes throughout pages 4-62 that there will be permanent effects to erosion, sedimentary input to the waterbody, altered shaded habitats which could result in a decrease in fish due to increased predation, stream bank scrubbing, and conversion of forested wetlands to scrub-shrub wetlands. It states that such impacts will be minimized by "mitigation", however, it provides no data or analysis on how such "mitigation" will succeed.

5) The draft EIS claims that disturbed areas can be restored to pre-construction conditions with respect to soil, hydrology and vegetation. However, since PennEast has yet to finalize a Wetlands Restoration Plan in consultation with the US Army Corps of Engineers and other NJ State agencies for this project, the Township questions the validity of these claims.

Due to the large gaps relating to the pipeline's potential to affect water quality, Alexandria Township urges that FERC deem the draft EIS "incomplete" and that the public comment period be extended until after these and other data gaps have been completed and corrected. The Township believes it is a violation of the National Environmental Protection Agency rules for an EIS to claim that mitigation will be successful without first providing supporting data or adequate analysis to support such conclusions. Accordingly, the Township urges FERC to withdraw the draft EIS for deficiency reasons and to extend the public comment period so that the public may comment on a complete draft EIS.

B. SUBSTANTIVE CONCERNS OF PROPOSED ROUTE AS SHOWN IN THE DEIS

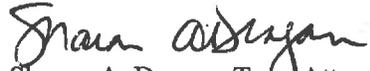
1) The Township understands that the original pipeline route was adjusted to avoid encroachment on federally-funded preserved farmland known as "Bobolink Farm". However, the proposed route now additionally crosses and impacts three high quality streams, two Township roads (it previously crossed one) and impacts a major subdivision near Stamets Road; the Township believes that this alternative route is illogical.

2) The proposal will cross property in Alexandria Township that has been preserved with public (state and local) funds which directly contradicts the purpose for which such monies were spent.

3) The proposed route will force the removal of thousands of trees across the Township's 100 foot buffer zone. One property owner in Alexandria estimates that she will lose over 1,000 trees on her property alone. The Township urges that such a proposed widespread removal of trees is the wrong approach in view of the current understanding with respect to climate science.

If the pipeline project moves forward, the Township urges PennEast and FERC to consider a lower impact alternative, such as co-location with other utilities within the existing rights-of-ways in the Township.

Respectfully submitted,

A handwritten signature in cursive script that reads "Sharon A. Dragan".

Sharon A. Dragan, Twp. Attorney
for Alexandria Township

cc: Mayor and Township Committee
Michele Bobrowski, Twp. Clerk