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January 21, 2016

Via Electronic Filing
Secretary Kimberly D. Bose
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: PennEast Pipeline Company, LLC
PennEast Pipeline Project
Docket No. CP15-558-000

Dear Ms. Bose:

We urge the Federal Energy Regulatory Commission (“FERC”) to suspend its NEPA review process of the above-referenced application for a certificate of public convenience and necessity until PennEast Pipeline Company, LLC’s (“PennEast”) provides a complete response to the information request that FERC submitted to PennEast on November 24, 2015. FERC’s request stated, “the information requested is necessary for us to continue preparation of the environmental impact statement (EIS).” Despite having submitted its formal application on September 24, 2015, PennEast has yet to provide FERC with the requisite information upon which FERC could take the hard look and conduct the searching analysis required by NEPA. Moreover, in response to FERC’s November 24th letter, giving PennEast twenty days to provide such information, PennEast submitted a filing that can fairly be characterized as nonresponsive – a mere placeholder for providing actual data upon which FERC could draft a legally sufficient EIS. In doing so, PennEast demonstrated both a blatant disregard for the FERC’s NEPA review process, as well as for the stakeholders’ concerns.

Given the huge gaps in data submitted to this docket, FERC lacks important information upon which it could prepare even a draft EIS reflecting a hard look at this project. Put simply, FERC must have something to take a hard look at – and PennEast has thus far failed to provide it. For example, in response to FERC’s request for the mile post locations for anode beds and test stations, including a description of land cover and additional impacts at each location, PennEast stated that it will provide FERC such information in the *third quarter of 2016*. And this is but one example culled from PennEast’s late December 14, 2015 submission, which reads as bold abdication of its responsibilities to timely respond to FERC. PennEast has similarly ignored FERC’s directive to provide NJDEP with data and studies that NJDEP has deemed necessary to an EIS process. In PennEast’s December 15, 2015 “response,” it simply

indicates that it will answer NJDEP in 2016, and even more egregiously, that it will not provide alternative route analysis or mitigation plans until it begins the state permitting process. FERC cannot begin to assess, let alone take a hard look, at environmental impacts that the applicant has failed to disclose and stated that it will not do so until months from now. Absent such data, FERC's preparation of a DEIS would not meet the requirements of NEPA. At this time a DEIS would be an empty exercise, with no potential to evaluate actual environmental consequence of this greenfields pipeline project.

We are in the process of preparing comments responding in greater detail to the current albeit limited environmental data in this docket, and anticipate submitting such analysis in the near future. At this juncture, however, we urge the FERC suspend review of the above-referenced application, until such time as PennEast provides actual data to which stakeholders and state and federal agencies can review.

Sincerely,



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