

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

PennEast Pipeline Company

PennEast Pipeline Project

Docket No. CP15-558-000
PF15-1-000

MOTION TO INTERVENE OF NEW JERSEY HIGHLANDS COALITION

On September 24, 2015, PennEast Pipeline Company filed an application requesting that FERC issue a Certificate of Public Convenience and Necessity, which would authorize PennEast to construct, install, own, operate and maintain the approximately 118-mile, 36-inch diameter PennEast Pipeline. In accordance with Rule 214 of FERC's Rules of Practice and Procedure, 18 C.F.R. § 385.214, the New Jersey Highlands Coalition ("the Intervenor") respectfully move for the Commission to grant intervention in the above-captioned matter. While the Intervenor has included several substantive comments in this motion, Intervenor also intend to submit more extensive substantive comments at a later date.

I. COMMUNICATION AND CORRESPONDENCE

Service in this proceeding should be made upon, and communications should be directed to the following:

New Jersey Highlands Coalition
508 Main Street
Boonton, NJ 07005
erica@njhighlandscoalition.org

II. INTERVENOR

The New Jersey Highlands Coalition serves as a representative of a diverse network of organizations. The NJ Highlands Coalition's mission is to protect, restore, and enhance the water and other natural and cultural resources of New Jersey's Highlands, now and for the future. The group works to educate Highlands' residents and Highlands' water users throughout New Jersey on the economic and health benefits of preserving the quality and quantity of clean water in the Highlands and encourages those affected by projects to voice their concerns about inappropriate developments within the region that put Highlands resources at risk. The NJ Highlands Coalition has been engaged in the pre-filing process for the PennEast Pipeline project proposal.

III. GROUNDS FOR INTERVENTION

The Intervenor is considerably concerned about this application. Members of this organization and the constituents that they serve live in the areas that will be directly impacted

by the Project. The pipeline and its associated facilities will cut through areas of the New Jersey Highlands with critical environmental and cultural resources. The Intervenor raises environmental, public health, and safety concerns on behalf of their members along the project right of way, in the impacted communities, and across the state of New Jersey.

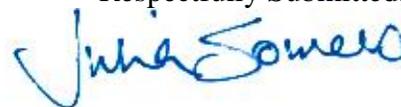
Significant environmental impacts of the Project are clear in the New Jersey Highlands, including but not limited to sedimentation, erosion, and potentially contamination impacts to the streams and rivers during construction that lower water quality in this critical region. Additionally, severe impaction of the soil will reduce the ability for water to recharge groundwater supplies. The Intervenor notes that locating the Project through the region will create a new conduit for water through the gravel surrounding the pipeline, altering the hydrologic pattern of the watershed lands. Water will run parallel with the new pipeline instead of recharging aquifers and river ecosystems, degrading the quality and quantity of water available to New Jersey residents.

Intervenors have considerable interest and are invested in protecting the environmental and public health of the Highlands in which the pipeline is proposed to be built. The Intervenor's intervention in the Project application process is in the public interest as required by 18 C.F.R. § 385.214(b)(2)(iii). No other party in this proceeding will be able to adequately protect resources specific to the Highlands region. Accordingly, the Intervenor has a direct and substantial interest in the outcome of this application process.

IV. CONCLUSION

For the reasons set forth above, the Intervenor respectfully requests that this Motion to Intervene be granted and that they be permitted to participate, with the full rights of a party, in the above-captioned proceeding before FERC.

Respectfully Submitted,



Julia Somers, Executive Director
New Jersey Highlands Coalition
508 Main Street
Boonton, NJ 07005
Phone: (973) 588 7190