

public convenience and necessity authorizing the construction and operation of the PennEast pipeline and associated facilities (“Project”), including the environmental impacts of and public need for the Project.

III. Identity of Movant

TROUT UNLIMITED is a private, nonprofit 501(c)(3) organization, founded in 1959 and currently headquartered outside of Washington, D.C. Trout Unlimited is the nation’s largest coldwater conservation organization with a mission to conserve, protect and restore North America’s trout and salmon fisheries and their watersheds. As of October 2015, Trout Unlimited had more than 16,200 members working to achieve its mission throughout Pennsylvania and New Jersey. Trout Unlimited members are passionate about the sport of fishing and they dedicate a significant amount of time to fulfilling the organization’s conservation mission and to ensuring fishing opportunities for today’s anglers and for the next generation.

IV. Background

In Docket No. CP15-558-000, PennEast has applied for authorization under Section 7(c) of the NGA to construct, own and operate a new pipeline system comprising 114 miles of 36-inch diameter mainline transmission pipeline from Luzerne County, Pennsylvania to Mercer County, New Jersey; a 2.1 mile, 24-inch lateral in Northampton County, Pennsylvania; a 0.6 mile, 12-inch diameter lateral in Hunterdon County, New Jersey; a 1.4 mile, 36-inch diameter lateral in Hunterdon County, New Jersey; a 47,700 horsepower compressor station in Carbon County, Pennsylvania; and various aboveground facilities, including interconnects, launchers, receivers and mainline block valves. The Project would require a temporary 100 to 125-foot construction right of way, with a permanent 50-foot right-of-way retained for Project operation

and maintenance. Approximately 2,431 acres will be disturbed during construction of the Project and approximately 777 acres will be retained by permanent easement for operation.

The Commission's Notice of Application for the Project states that motions to intervene are due on or before October 29, 2015.

V. Intervention

For the reasons set forth in Movant's comments on the Project submitted to the Federal Energy Regulatory Commission on February 27, 2015, which are incorporated by reference in full herein, *see* 18 C.F.R. § 385.214(b)(1), Movant seeks to intervene in this proceeding because, if the application is granted, the Movant and its members will be immediately and permanently harmed by the economic, environmental, and other impacts of the Project.

Specifically, Movant has informational interests in a comprehensive analysis, pursuant to the National Environmental Protection Act ("NEPA") and other law, of all direct, indirect, and cumulative environmental, social, and economic consequences of the Project. Additionally, Movant has substantive interests that will be adversely affected by the following Project impacts: the direct, indirect, and cumulative environmental impacts of Project construction and operation on Movant's members who work or engage in recreational activities in the Project area and surrounding communities; impacts on fishing opportunities that Movant and its members enjoy within the vicinity of the Project area and surrounding communities; and the economic impacts of the Project and the environmental damage it may cause, including but not limited to the costs of impaired ecosystem services, costs of stream restoration and harm to fishing-related tourism and recreation.

Collectively, on average, Movant's members spend more than 70,000 hours on an annual basis working to protect, restore and reconnect native and wild trout streams in Pennsylvania and New Jersey. According to the U.S. Fish & Wildlife Service, in 2011, there were approximately 538,000 anglers who fish for trout in Pennsylvania and New Jersey and they spent more than 5.3 million days that year fishing for trout in these two states. Further, in 2011, anglers spent more than \$1.6 billion on fishing equipment and trip-related expenses, generating significant revenue for these two states and local communities. The Project is proposed to be located in or near many of the streams and rivers where Movant and other anglers fish for native and wild trout, and where communities benefit from economic revenue generated by fishing-related activities. Additionally, many of the streams in or near the Project are designated as High Quality or Exceptional Value and hold trout fishery designations, such as Class A Wild Trout waters or naturally reproducing trout streams. As the nation's largest coldwater conservation organization working to protect and restore native and wild trout streams, and to retain and increase fishing opportunities, and as a result of our continuous efforts to achieve these goals in Pennsylvania and New Jersey, Movant has a significant and unique interest in the Project.

The Movant's interests will not be represented by any other party and therefore will not be adequately protected unless the Movant is permitted to intervene and to participate as a formal party to this proceeding. Further, the Movant's participation in this proceeding will lead to better informed decision-making and more reliable protection of affected public water resources. The Movant therefore satisfy the conditions for intervention because their participation is in the public interest. *See* 15 U.S.C. § 717n(e); 18 C.F.R. § 385.214(b)(2).

WHEREFORE, Movant respectfully request that the Commission grant this motion to intervene and authorize Movant to participate fully as parties in this proceeding.

Alpine, New York

October 29, 2015

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Katy Dunlap". The signature is written in a cursive, flowing style.

Katy Dunlap, Esq.
TROUT UNLIMITED
6281 Cayutaville Rd.
Suite 100
Alpine, NY 14805
Phone: 607-703-0256
Fax: 703-284-9400
kdunlap@tu.org