



# TOWNSHIP OF HOPEWELL

## MERCER COUNTY

201 Washington Crossing Pennington Road  
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609.737.0605 Ext. 664  
609.737.6839 Fax  
December 5, 2016

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

**RE: Comments on Draft Environmental Impact Statement  
Docket CP15-558-000  
Proposed Gas Pipeline  
PennEast Pipeline Company LLC  
Hopewell Township, Mercer County**

Dear Ms. Bose,

On November 23, 2016 the PennEast Pipeline Company LLC submitted narrative responses to the November 7, 2016 Data Request. Hopewell Township offers the following comments with specific regard to Response 6 for alternative interconnection location with the Transcontinental Gas Pipe Line Company, LLC. Hopewell Township is a registered intervenor on the PennEast Docket, CP15-558-00.

The response provided was a very low level review of alternatives and is unacceptable. PennEast's proposed route is responsible for encroachment into Hopewell Township's affordable housing site, a crossing of New Jersey State Highway Route 31, a known contaminated site on the east side of the Route 31 Pennington Circle and creates two miles of additional pipeline construction with significant encroachment in existing residential neighborhoods. Additionally, this additional 2 mile pipeline segment crosses watershed boundaries. The entire PennEast pipeline route is located within the Delaware River Watershed except for this 2 mile segment which is located in the Stony Brook Millstone Watershed

PennEast has considerable "constructability limitations" along its entire route. Citing "constructability limitations" without factual support clearly demonstrates PennEast's unwillingness to consider an alternate Transco connection even though the same would create significantly less impact.

PennEast's statement "Furthermore, the current alignment has been carefully routed to collocate with utilities and minimize frontage impacts to landowners to the extent practicable. The combination of easement encumbrances, constructability issues, and the Project's delivery needs preclude the alternatives put forth by Hopewell Township in favor of the current alignment" fails to recognize that there are only two commercial property owners that would be affected by the western alternate.

The statement "Finally, the current proposed tie-in location with Transco was chosen through extensive negotiations with Transco and utilizes existing facilities to the maximum extent possible, reducing site disturbances" fails to recognize that repeated requests were made to PennEast by Hopewell Township for an alternate. This is demonstrated in the attached email communication between Hopewell Township Administrator/Engineer Paul E. Pogorzelski, P.E. and a Transco representative dated November 26, 2014 and attached communication between Hopewell Township Administrator/Engineer and Mike Mara of UGI on December 4, 2014. Hopewell Township has been raising this issue since the inception of this project and at no point has PennEast provided a compelling argument to indicate why an alternate Transco connection is not possible. The entire Transco line is open access, meaning that PennEast can, by-right, connect to the Transco line at an alternate point. PennEast has had ample time to evaluate an alternate connection to Transco. To simply state that because they have already negotiated the present alignment is not a compelling argument and does not address NEPA requirements.

Exhibit A-1 and A-2 (attached) identify yet an additional alternate Transco connection which has not been considered.

FERC must not accept PennEast's current weak response on this issue and must require a full alternative alternatives analysis, discounting the fact that PennEast advanced one particular design without consideration of alternate Transco connection locations. If PennEast continues ahead with its current preferred route, we will consider this prima facie evidence that this project is inextricably linked to the proposed Cold Soil Compressor Station expansion, and the Southern Reliability Link, and will call on FERC to withdraw the current DEIS and draft a new one that outlines the cumulative environmental impacts of these three inter-related projects.

Sincerely,



Kevin D. Kuchinski, Mayor

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C: Hopewell Township Committee  
Michael Herbert, Esquire  
Governor Chris Christie  
Senator Robert Menendez  
Senator Cory Booker  
Senator Shirley Turner  
Congresswoman Bonnie Watson Coleman  
Assemblywoman Elizabeth Maher Muoio  
Assemblyman Reed Gusciora  
Mercer County Board of Chosen Freeholders  
Robert Martin, NJDEP Commissioner  
John Gray, NJDEP Deputy Chief of Staff  
Judith A. Enck, USEPA Region 2 Administrator  
John Eddins, ACHP

## Paul Pogorzelski

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**From:** Bedient, Mike <Mike.Bedient@Williams.com>  
**Sent:** Tuesday, December 02, 2014 1:24 PM  
**To:** Paul Pogorzelski  
**Subject:** RE: Hopewell Twp

Greetings Paul,

Sorry for my delayed response as I was off for a few days prior to the holiday weekend. Yes, we are an open access system and to the best of my knowledge we have not had any communications to date with the Penn East Pipeline project. We have a competing project which you are well aware of.

I do not recall discussing the railroad area which you might of pointed out on the map but since I am not as familiar with the layout as you are I could not comment. Could you let me know what you mean by NJR/AGL,SJL?

Regarding contracts I would have to defer you to our Business Development folks in Houston. Would you like a contact person?

Thanks  
mike

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**From:** Paul Pogorzelski [mailto:paulpogo@hopewelltp.org]  
**Sent:** Wednesday, November 26, 2014 8:31 AM  
**To:** Bedient, Mike  
**Subject:** RE: Hopewell Twp

Mike

In a meeting with PennEast yesterday they explained that they do not necessarily need an agreement to connect or to develop their pipeline plans yet because Transco is an "open access" pipeline. They also indicated that UGI and its partners (which form PennEast) own capacity in the Transco system and this pipeline will consume some of that capacity. They indicated that they will submit the required application to Transco for the interconnection when the pipeline design is complete and they will pay the required \$2-\$3M application fee at that time.

They also indicated that the connection point is dictated not by UGI but by its partners who have a limited location contractually with Transco. That is why they have not identified a connection point further west toward the railroad crossing at the power lines. This is a big constraint to a more suitable alternative route.

I recall that when we spoke you explained the physical components of the system were identical between your compressor station and the railroad area and a physical interconnection by PennEast, might be possible west of its present proposed location.

Since I have no knowledge of how contracts are set up in the pipeline industry, I am wondering if you can find out if there is a contract that limits connections by NJR/AGL/ SJI to the area between your compressor station and your valves on Blackwell Road? If so, can you advise if it is a huge deal to relocate that limitation to the area between the railroad and the compressor station?

I appreciate any info you can share. Thank you and Happy Thanksgiving!

## Paul Pogorzelski

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**From:** Mike Mara <mmara@ugies.com>  
**Sent:** Friday, December 05, 2014 8:19 AM  
**To:** Paul Pogorzelski  
**Cc:** Jeff England; Dante D'Alessandro  
**Subject:** RE: Transco question

Paul,

We are in the process of looking at the overall re-route including the Transco tie point. Hope to have a revision that can we can discuss early next week. Jeff, Dante and their team are continuing to work on this and will reach out to you.

Thanks  
Mike

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**From:** Paul Pogorzelski [mailto:[paulpogo@hopewelltwp.org](mailto:paulpogo@hopewelltwp.org)]  
**Sent:** Thursday, December 04, 2014 11:42 PM  
**To:** Mike Mara  
**Subject:** Transco question

Mike

Were you able to bring up the question of the location of the Transco connection at your conf. call today? If I can help with anything or provide any info please let me know. Thanks

Paul E. Pogorzelski, P.E.  
Hopewell Township Administrator/Engineer  
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Titusville, NJ 08560  
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609-737-6839 (fax)

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POSSIBLE WESTERN PENNEAST

REED ROAD

ALTERNATE CONNECTION

DIVERTY RD

EXITSING TRANSCO

EXHIBIT A-1  
ALTERNATE TRANSCO  
CONNECTION

DIVERTY ROAD

POSSIBLE ALTERNATE TRANSCO CONNECTION SITE

REED ROAD

CSX

EXISTING TRANSCO

POSSIBLE PENNEAST WESTERN ALIGNMENT

EXHIBIT A-2  
ALTERNATE TRANSCO CONNECTION

