



**Application of Tennessee Gas Pipeline Company for
a Certificate of Public Convenience and Necessity**

FERC Docket No. CP09 -

300 LINE PROJECT
Pennsylvania and New Jersey

VOLUME II

FINAL ENVIRONMENTAL REPORT

APPENDIX A

**FERC DATA REQUEST RESPONSE
TRACKING TABLE**

JULY 2009

RESPONSE TO FERC COMMENTS ON 300 LINE PROJECT DRAFT ENVIRONMENTAL REPORT			
Number	Data Request	Response Location	Summary of Response
GENERAL COMMENTS			
1	Provide a table summarizing the current status of Tennessee Gas Pipeline Company's (TGP) consultations with each agency and current documentation of consultations for the proposed 300 Line Project (Project). Ensure that any discussion of agency consultation within the final Resource Reports reflects the most current status of consultations.	VII - Appendix B	An updated agency correspondence Table has been provided along with copies of all correspondence in VII – Appendix B. All updated correspondence has been added to the respective Resource Reports.
2	Relatively minor discrepancies in individual and total lengths, acreages, and other dimensioned elements were noted between various tables and text throughout the draft Resource Reports (DRRs). Ensure that all correlative lengths, acreages, and totals are correct and consistent throughout the final Resource Reports. Also, ensure that section numbers and cross references are correct.	All Resource Reports	All correlative lengths, acreages and totals have been updated and cross-referenced throughout the final Resource Reports.

RESPONSE TO FERC COMMENTS ON 300 LINE PROJECT DRAFT ENVIRONMENTAL REPORT			
Number	Data Request	Response Location	Summary of Response
3	Provide a table identifying the location, timeframe, and general size of recently completed, current, and planned major projects (e.g., roads, bridges, mining, large commercial/industrial/residential developments) in the Project area. Also, provide a detailed discussion of cumulative impacts that these projects and the 300 Line Project would have on each applicable environmental resource, and the measures that TGP would implement to minimize cumulative impacts.	Resource Report 8 Section 8.2.1.1.9 Table 8.2-1 Volume II – Appendix B	Table 8.2-1 in Section 8.2 of RR8 identifies recently completed, current and planned major projects in the vicinity of the 300 Line Project. Consultation with County and Local officials in May of 2009 did not identify any major planned roads, bridges or mining developments within a half mile of the Project area (See Agency correspondence Volume II – Appendix B). A cumulative impacts discussion has been added to Section 8.2 of RR8.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 1			
1	Depict the appurtenant aboveground facilities (e.g., mainline valves and pig launchers/receivers) and staging areas and pipe yards on figures 1.1-2h through 1.1-2p and on the full sized 7.5-minute U.S. Geological Survey (USGS) topographic maps included in Appendix L.	Volume II – Appendix L Resource Report 1 Table 1.1-3	Staging Areas and Pipeyards are located on the Full-Size USGS Topographic Maps. Launchers and receivers are located at the beginning and end of Loop lines. Mileposts for launchers and receivers and MLVs are located in Table 1.1-3.
2	Discrepancies exist between the discussion in section 1.1.2.2.1 of the amounts of new and replaced horsepower at Compressor Station 325 and the amounts listed in table 1.1-3. Clarify this inconsistency and also verify the total of current horsepower at all compressor stations, which appears to be 88,662 horsepower (hp) rather than 85,112 hp as listed in table 1.1-3.	Resource Report 1 Section 1.1.2.2.1 and Table 1.1-2	Horsepower has been verified and updated Text in Section 1.1.2.2.1 and Table 1.1-2 have been edited to be consistent.
3	Drawings TE-T2-100-2-84C, TO-C63-E1-YA-O6A-4, and TO-C54-E1-YA2-O6A in Appendix P depict mainline valves and pig launcher and receiver assemblies, respectively. Revise these drawings to include the blow-down valves and silencers to be installed on the assemblies as described in sections 1.1.2.2.2 and 1.1.2.2.3	Volume II – Appendix Q	Drawings have been revised to include blow-done valves. No silencers will be attached.

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RESOURCE REPORT 1			
4	<p>Table 1.2-1 (and tables 8.1-3 and 8.1-4 in DRR 8) appear to include the impacts associated with permanently maintained (i.e., previously disturbed and already cleared) right-of-way for the existing 24-inch-diameter pipeline. To accurately reflect the impacts associated with the proposed Project, provide additional tables similar to table 1.2-1 (and tables 8.1-3 and 8.1-4, and other Resource Report tables as appropriate) that list the construction and operation impacts associated with the 300 Line Project <u>only</u>. For example, list only the incremental impacts that would result from maintenance of the new 30-inch-diameter pipeline right-of-way (i.e., this would exclude the area already maintained for operation of the existing 24-inch-diameter pipeline). Ensure that any recalculations of land requirements or impacts are consistently and accurately reflected in all other applicable Resource Reports and plans.</p>	<p>Resource Report 1 Tables 1.2-1 through 1.2-16 Resource Report 8 Table 8.1-4 Table 8.1-5</p>	<p>To accurately reflect the impacts associated with the proposed Project, Tables have been added to RR1 that list the construction and operation impacts associated with the 300 Line Project ONLY. In other Resource Reports all impacts identified as permanent are only those 'new' impacts associated with the 300 Line Project and do not include the existing easement.</p>

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RESOURCE REPORT 1			
5	Tables 1.2-2 through 1.2-8 refer to typical right-of-way cross section drawings included in Volume IIA – Appendix C. However, the referenced drawing numbers in the tables do not correspond to the drawing numbering scheme of the figures included in Volume IIA – Appendix C. Adopt a consistent numbering scheme to refer to the typical right-of-way cross section drawings and associated text in all Resource Reports	Tables 1.2-3 through Table 1.2-16 Volume II - Appendix C	The referenced drawing numbers in the tables have been changed to correspond to the drawing number scheme of the figures included in Volume II – Appendix C. References to drawing numbers in other Resource Reports were also changed to remain consistent.

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RESOURCE REPORT 1			
6	Regarding the typical right-of-way cross section drawings included in Volume IIA – Appendix C: a. depict and label on each figure the existing permanent right-of-way, proposed construction right-of-way, and proposed final permanent right-of-way; b. identify the milepost segments of each proposed loop to which each typical right-of-way cross section applies; c. drawings R1A and R1B depict spoil storage extending outside of the requested construction right-of-way. Modify these drawings to indicate that spoil storage would be confined to the proposed construction right-of-way; d. on drawings R4A and R4B, the arrows used to illustrate the extent to which topsoil stripping would occur do not extend the entire width of the illustrated topsoil stripping area, and this width appears to be 80 feet rather than 75 feet as labeled on the drawings. Revise these drawings to rectify these minor discrepancies; and e. provide typical right-of-way cross section(s) depicting construction and operation for each configuration in wetlands.	Volume II - Appendix C	<p>Typical drawings have been updated and are located in Volume II – Appendix C.</p> <p>Refer to Typical Drawings WW2A/B (Typical Wetland Construction) and WW3A/B (Typical Push/Pull Wetland Construction).</p> <p>Tables identifying the milepost segments have been added to Volume II – Appendix C.</p>

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RESOURCE REPORT 1			
7	Where the proposed construction right-of-way would be wider than 75 feet, (or 100 feet when utilizing the existing permanent right-of-way) provide justification for the requested width (e.g., topsoil segregation, steep side slope, extraordinary equipment requirements).	Resource Report 8 Table 8.1-7 Resource Report 2 Table 2.3-16	In non-typical areas of construction where greater than 100’ of workspace is required (or 75’ in wetlands), Additional Temporary Workspace (ATWS) was utilized. In Resource Report 8, Table 8.1-7 “Additional Temporary Workspace Associated With The 300 Line Project” identifies these areas and provides justification. Table 2.3-16 in Resource Report 2 includes areas where greater than 75 feet of workspace is required within wetlands. Justification is also provided in this table.

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RESOURCE REPORT 1			
8	Section 1.2.2 states that the proposed modifications to the existing compressor stations would be made either in the existing compressor station buildings or within the developed footprint at the compressor station properties. However, drawing TE-S313-A1-YA-1 in Volume III – Appendix P depicts a proposed substation outside of the existing fence line at Compressor Station 313. Clarify this discrepancy and, if the substation is a component of the Project, ensure that the land requirements and impacts associated with the facility are addressed in all applicable Resource Reports	Resource Report 1 Section 1.2.2	If you assume that the “developed footprint” of each station is limited to the area within the existing fence line, then FERC is correct that there is a discrepancy. At station 313, the substation will be installed outside the existing fence line as shown on drawing TE-S313-A1-YA-1. Also, at station 315, the existing fence line will be rerouted permanently, as shown on drawing TE-S315-A1-YA-1 to make room for the new filter separator to be installed at the station. In both instances, the land requirements and associated impacts have been accounted for in the resource report. Although the facilities mentioned will be installed outside of the existing fence line, no facilities at existing stations will be installed outside of existing TGP property boundaries.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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RESOURCE REPORT 1			
9a	<p>Section 1.3 states that TGP would comply with the Federal Energy Regulatory Commission’s (FERC or Commission) Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and the Commission’s Wetland and Waterbody Construction and Mitigation Procedures (Procedures) through implementation of TGP’s project-specific Environmental Construction Plan (ECP), and that project-specific modifications or alternative measures to the Plan and Procedures are detailed in section 1.3.1.9.9. It appears that the intended reference is to section 1.3.1.9.10, which details TGP’s requested deviations from the December 2, 1994 version of the Plan and Procedures, not the current January 17, 2003 version. Concerning TGP’s ECP and section 1.3.1.9.10</p> <p>-revise this section to request deviations from the current version of the Plan and Procedures, including correct references to the Plan and Procedures measures to which deviations are requested;</p>	<p style="text-align: center;">Resource Report 1 Section 1.3.1.9.9 Volume II – Appendix D (ECP Section 9.0)</p>	<p>Section 1.3.1.9.9 of Resource Report 1 and Section 9.0 of the ECP have been revised to reflect requested deviations from the 2003 FERC Plan and Procedures.</p>

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RESOURCE REPORT 1			
9b	-provide thorough justification (including tables listing the locations by milepost) for each requested deviation; and	ECP Section 9.0 Resource Report 1 Section 1.3.1.9.9 Resource Report 8 Table 8.1-7	A table of ATWS areas within 50 feet of wetlands and within 50 feet of waterbodies is provided in Resource Report 8 Table 8.1-7, with a column for justification. Justification for other deviations is presented in Section 9.0 of the ECP and Section 1.3.1.9.9 of Resource Report 1. Some of the deviations to the FERC Plan and Procedures, listed in the referenced sections, will be determined after evaluating site conditions at the time of construction.
9c	-ensure that the ECP and other applicable references throughout the Resource Reports are also revised to incorporate the current versions of the Plan and Procedures.	ECP / Resource Reports	Other Resource Reports and the ECP have been edited to incorporate the 2003 FERC Plan and Procedures.
10	Numerous inconsistencies exist between the construction and mitigation measures described in the DRRs and TGP's ECP. Rectify the following examples of inconsistencies between DRR 1 and the ECP, and all other inconsistencies between the ECP and other DRRs, examples of which are provided in other comments.	ECP / Resource Reports	Changes have been incorporated into the ECP and Resource Reports to rectify inconsistencies between the ECP and Resource Reports.

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RESOURCE REPORT 1			
11	Provide an update on the status of field surveys, including a detailed account (i.e., table) of the location (milepost) and extent of all non-surveyed areas, as well as the anticipated schedule for completion of surveys along the remainder of the Project.	Resource Report 1 Section 1.2.6 Table 1.2-19	Table 1.2-19 “Non-Surveyed Areas” has been added to Resource Report 1. The schedule for completion will depend on condemnation, which can be initiated after certification.
12a	Provide the following information for the nonjurisdictional facilities that would be constructed in association with proposed new Compressor Station 310 and existing Compressor Station 313: - a more detailed description of the facilities (e.g., height and construction material of electric power poles and whether communication utilities would be located aboveground or underground and within the same right-of-way as the electric power utilities)	Resource Report 1 Section 1.7	Tri-County’s electrical transmission facilities shall consist of 1 – 115 KV switching station and approximately 2,500 feet of 115 KV Transmission Line to TGP’s 115 – 13.2 KV substation. Tri-County’s facilities are described in Section 1.7
12b	-current 1:24,000-scale USGS topographic maps depicting the facilities;	Resource Report 1 Section 1.7	Section 1.7 describes the non-jurisdictional facilities
12c	-an estimate of the land requirements that would be required for both construction and operation of the facilities;	Resource Report 1 Section 1.7	Approximately 10 acres.
12d	-the entity or entities that would construct, own, and operate the facilities;	Resource Report 1 Section 1.7	Tri-County Rural Electric Cooperative, Inc.

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RESOURCE REPORT 1			
12e	-the anticipated schedule for obtaining the applicable federal, state, and local permits;	Resource Report 1 Section 1.7	Tri-County has indicated to Tennessee that it will use a single-pole construction technique for the above-described facilities and that such construction will not impact federal highways, federal tracts of land or bodies of water. Any new utility ROWs needed for the electric utility lines will be acquired by the applicable power company. Tri-County will be responsible for obtaining any necessary permits.
12f	-any agency responsible for permitting it	Resource Report 1 Section 1.7	Tri-County will be responsible for obtaining any necessary permits.
12g	-apply the “four factor” test to each nonjurisdictional facility	Resource Report 1 Section 1.7	Four Factor test discussed in Section 1.7.

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RESOURCE REPORT 1			
13	Describe the minor modifications that would be conducted to upgrade existing utilities at existing Compressor Stations 315, 319, 321, and 325, and identify the entities that would construct, own, and operate the modified utilities. If work would occur outside of existing rights-of-way or property boundaries, provide the information requested above in question 12 a. through g.	Resource Report 1 Section 1.1.2.2.1	At Stations 315, 321, and 325 minor utility upgrades would be limited to the replacement of the components that comprise the existing electric feed to the station, which may include the transformer or transformer bank, transformer primary wire/cable, transformer secondary cable, and/or circuit protection devices, such as breakers. Based on the assumption that the respective utilities' existing power distribution infrastructure is sufficient to support the incremental load requirements for these stations, no modifications to the utilities' overall distribution networks, such as line change outs, will be required. The respective local utility owns and operates the purchase power feed to each compressor station, and they would continue to do so after these modifications have been made (see the individual compressor station discussions below for additional detail on existing and required utilities). The emergency generators and uninterruptible power supplies for critical services will also be included. Each new compressor station site will be designed to manage hazardous waste containment and disposal. Station 319 will not require any utility modifications as part of this project.

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RESOURCE REPORT 1			
14	Provide schematic drawings depicting the stove-pipe and drag-section construction methods.	Volume II - Appendix C	The subject construction methods are depicted in a typical drawing located in Volume II – Appendix C. Reference typical drawing SRC “Special Residential Construction Work Locations”.
15	Revise section 4.5 of TGP’s ECP to include notification of the FERC of any disturbances outside of the authorized work areas within 24 hours and also in any required construction report.	Volume II – Appendix D (ECP Section 4.5)	Tennessee will notify the FERC of the disturbance within 24 hours and will include a write-up of the disturbance in required construction reports.
16	In section 5.5 of TGP’s ECP, detail how TGP would ensure that imported topsoil for replacement in residential areas is of similar quality to the existing topsoil.	Volume II – Appendix D (ECP Section 5.5)	The EI will oversee and approve of all imported material as required and ensure that the Contractor adheres to the restoration and mitigation plans defined for residential construction.
17	Indicate the status of site selection for staging areas and pipe yards and provide the appropriate mapping and figures if sites have been selected. Also, update all applicable tables if acreage impacts have changed because of the size of the staging areas and pipe yards was different than what was estimated in the DRRs.	Resource Report 1 Attachment A Resource Report 8 Table 8.1-9 Volume II - Appendix O (Alignment Sheets) Volume II – Appendix L (Full-Size USGS)	Site selection for staging areas and pipe yards is complete. All applicable tables and acreage impacts have been updated in the Resource Reports.

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RESOURCE REPORT 1			
18	In section 5.12.1.3 of the ECP, in addition to noting the typical minimum pipeline burial depth, provide the burial depths for other, non-typical conditions (e.g., agricultural land, waterbodies, bedrock).	Volume II – Appendix D (ECP Section 4.1.4.4)	Class1- 30” soil, 18” rock; Class2,3,4- 36” soil, 24” rock; Drainage ditches of public roads or RR xings- 36” soil, 24” rock; Navigable river, stream, harbor- 48” soil, 24” rock; Minor stream xing-36” soil, 24” rock; Offshore- 36” (Reference MES Sec.500 Cover and Clearance)
19	Revise the site-specific horizontal directional drill (HDD) plans to include the following: a. pipeline mileposts; b. boundaries of the construction work area including temporary workspace and additional temporary workspace; c. details of the HDD workspaces (e.g., drilling mud containment structures, erosion and sediment control structures); and d. label or otherwise identify sensitive environmental areas and other features including wetlands, waterbodies, residences, roads, etc.	Volume II - Appendix N	The HDD drawings have been updated as requested.

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Resource Report 2			
1	In its comment letter dated March 2, 2009, the Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry (PABF) requested that TGP bore crossings of five Chapter 93 designated waterbodies on state forest land. Identify the Chapter 93 designated waterbodies by milepost and stream name. Indicate the feasibility of crossing these waterbodies by HDD. If HDD is not feasible, provide the results of consultation with the PABF regarding TGP’s proposed crossing methods and protection for these waterbodies.	Resource Report 2 Section 2.2.7 Table 2.2-13	Chapter 93 designated waterbodies located on PABF land are identified in Table 2.2-13. One crossing is located on Loop 313 and four are located on Loop 323. HDD or bore of these streams would add area affected by staging, be hindered by stony soils and create potential safety concerns during construction. Tennessee proposes to cross waterbodies with discernable flow with dry-crossing techniques and will adhere to their ECP. Tennessee will work with PA DCNR in determining crossing methods as these locations.
2	Provide a table indicating the acreage of permanent and temporary (including access roads and temporary workspace) impacts for wetland cover types and associated vegetative communities described in sections 2.3.1.1.1 and 2.3.1.1.2.	Resource Report 2 Tables 2.3-1 though 2.3-14	Tables 2.3-1 through 2.3-14 of RR 2 provide permanent and temporary impacts for general wetland cover types as described by Cowardin, et. al. (1979). Impact calculations are limited to the general cover types for simplicity in calculating and discussing project impacts for assessment purposes. Tennessee asserts that further detailed breakdown and categorization of wetland impacts beyond vegetative cover type would not enhance or facilitate project review and assessment.

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Resource Report 2			
3	There are numerous wetlands depicted on alignment sheets and included in the wetland crossing tables that show no temporary or permanent impact, even though they are clearly depicted within the construction workspace. Clarify this discrepancy.	Resource Report 2 Tables 2.3-1 through 2.3-14 Volume II - Appendix P (Site-Specific Wetland Crossing Plans)	Wetland Site Specific drawings, which were not submitted for the Draft filing, will be available for the final filing. In addition, Tables 2.3-1 through 2.3-14 identify “Temp” and “Perm” Acreage Affected for all wetlands. The impacts are also be available on the Wetland Site Specific drawings.
4	Discuss the potential for blasting to affect wetlands and measures to be implemented to detect and remedy such impacts	Resource Report 2 Section 2.3.3	While unlikely, if blasting is necessary within wetlands, Tennessee will follow their ECP and the FERC Plan and Procedures to minimize impacts to wetlands from blasting.

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Resource Report 2			
5	Indicate if the spring detailed in the Tamboer’s Comment letter is crossed by the pipeline and what measures TGP would take to ensure the spring is not impacted.		A spring was not identified in the survey data on the subject property. The following is the response from the scoping comments – “The ECP found in Volume II, Appendix D of the Draft ER details erosion and sedimentation control practices and other techniques to be implemented during construction to ensure that no adverse impacts to wetland, waterbody, and spring resources result from the Project. Additionally, Tennessee will require an Environmental Inspector be on-site during all wetland and waterbody crossing to ensure that BMP’s are followed. Tennessee’s land department will incorporate your concerns regarding the spring into the project line list to identify special construction techniques as needed.”
6	List in a table by milepost, any areas where greater than 75 feet of construction workspace would be utilized in wetlands. Provide site-specific justification for these alternative measures to the FERC’s Procedures. Also, ensure that the alignment sheets are correct with respect to additional temporary workspaces in wetlands. There appear to be a few areas (found on Loop 319) where workspaces are located in wetlands	Resource Report 2 Table 2.3-16	Table 2.3-16 has been provided in Resource Report 2, identifying areas where greater than 75 feet of construction workspace would be utilized in wetlands and providing site-specific justification. Alignment sheets have been updated.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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Resource Report 2			
7	Detail when TGP plans to finalize hydrostatic testing discharge locations and why multiple test manifold sites are needed for each loop. Explain if TGP plans on “cascading” the water from test section to test section during hydrostatic testing. Update the status of consultations with the Susquehanna and Delaware River Basin Commissions.	Resource Report 2 Section 2.2.5 Table 2.2-11 and Table 2.2-12	Multiple test sites are required to meet the required pressure requirements for an acceptable test. Test segments were selected based on several factors: the pipe parameters, the elevation changes within the loop, the target design pressure of 1170 pound force per square-inch gauge (“psig”), and the class locations of the pipeline. Pipe was allocated as necessary to minimize the quantity of test segments in each loop and to meet DOT design standards. A summary of the test segments and required volumes are located in Tables 2.2-11 and 2.2-12. To the maximum extent practicable, Tennessee will transfer hydrotest water from one test segment to the next within a loop (cascaded), to reduce the volume of water required per loop. TGP is preparing applications to the Susquehanna and Delaware River Basin Commissions for any withdrawal or discharge of hydrostatic test water within the jurisdiction of the respective Commissions.

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Resource Report 2			
8	The last sentence of section 2.3.2.2 states that no permanent impacts to identified wetlands are anticipated as a result of construction or operation of the aboveground facilities associated with the Project. However, section 2.3.1.2.1 states the road and the fence at proposed Compressor Station 303 would result in a permanent impact of approximately 1,600 square feet of wetland. Rectify this inconsistency.	Resource Report 2 Section 2.3.2.2 and 2.3.1.2.1	Sections 2.3.2.2 and 2.3.1.2.1 have been edited to be consistent. See referenced sections for impacts to the identified wetlands.
9	The second sentence of the second paragraph of section 2.3.4 states that wetlands can only be crossed during frozen conditions or with the use of mats. Clarify the discrepancy with this statement and that in section 2.3.3 within the Standard Pipeline Construction (Method 1) that states that wetlands can be crossed if non-saturated conditions are present and able to support construction equipment. Also, if no mats are used, would soil be de-compacted?	Resource Report 2 Section 2.3.3 Section 2.3.4	Access within the ROW across wetlands will only be permitted where soils are non-saturated and able to support construction equipment at the time of crossing, during frozen soil conditions (for winter tree clearing) or with the use of timber mats to avoid rutting of the wetland soil. The Standard Crossing Method in Section 2.3.3 will be utilized in wetlands where soils are non-saturated and able to support construction equipment at the time of crossing. If mats are not used, soil will be de-compacted using a harrow, paraplow, paratill or other equipment. Deep subsoil shattering shall be performed with a subsoiler tool having angled legs. Conventional crossing methods will be utilized where soils are saturated, which involves stabilizing the ROW with the use of timber mats.

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Resource Report 2			
10	Is there a difference between timber mats, swamp mats, timber work mats, and pads as described in section 2.3.3? If so, describe the difference, if not, be consistent in the naming of these items.	Resource Reports and ECP	There is no difference between timber mats, swamp mats, timber work mats and pads. References within the ECP and Resource Reports have been made to consistently use the term timber mats.
11	The last paragraph of section 2.3.3 states that the excavated material would be stored adjacent to the trench (if possible). Provide a discussion of other possible locations for storage of excavated material if it is not possible to store adjacent to the trench	Resource Report 2 Section 2.3.3	If storage of excavated material next to the trench is not possible, the material will be temporarily stored in one of the following locations 1) in upland areas of the ROW as near to the trench as possible, 2) in construction vehicles or 3) transported to an approved off-site staging location until needed for backfilling.
12	Correctly identify in the text and tables the permanent vegetation impacts in forested wetlands (i.e., maintained right-of-way within 5 feet of the pipeline would be herbaceous and within 15 feet of the pipeline would be scrub/shrub)	Resource Report 2 Table 2.3-1 through Table 2.3-14	This is identified as the permanent impact type in the updated wetland impact tables.
13	Although the proposed centerline of Loop 317 would cross a forested wetland (wetland number 317W004), permanent affected acreage is reported as 0.00 in table 2.3-5. Clarify this discrepancy.	Resource Report 2 Table 2.3-5	Wetland impact numbers have been updated in the Final Environmental Report. See Table 2.3-5, W004.

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Resource Report 2			
14	Discuss the potential for groundwater and surface water impairment resulting from damages to septic systems during construction and describe any associated mitigation proposed by TGP.	Resource Report 2 Section 2.1.4	Tennessee has taken steps to identify these septic system locations and route the workspace such that it avoids potential impact. As part of the negotiations with landowners for work space, additional easements (if required), and/or damages, Tennessee’s land representatives will again request information on the location of wells and septic systems, in order to prepare and inventory for any required pre- and post-construction monitoring and tests. To the extent that any septic systems or wells encroach into Tennessee’s existing permanent easement, Tennessee will work with the landowner to resolve the encroachment.
15	Similar to table 8.1-7 in DRR 8 which identifies additional temporary workspaces within 50 feet of wetlands, list by milepost all additional temporary workspaces proposed by TGP that would be within 50 feet of the water’s edge of a given waterbody. Provide site-specific justification for these alternative measures to the FERC Procedures	Resource Report 8 Table 8.1-7	Table 8.1-7 in Resource Report 8 has been updated to identify ATWS that is both within 50 feet of a wetland and 50 feet of a waterbody.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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Resource Report 2			
16a	Tables 2.2-3 through 2.2-9 of DRR 2 list a number of waterbodies with a designation of either Coldwater or Warmwater fisheries. However, a number of these indicate that a timing restriction is not applicable (i.e., 313S006, 315S012, 319S027). Where TGP has determined that a timing restriction is not applicable: -describe the process used to make the determination of non-applicability;		In Tables 2.2-3 through 2.2-9 of DRR 2, timing restrictions are not applicable to streams that were identified as intermittent. While some of these intermittent streams may have been designated as cold or warmwater fisheries by state water quality standards, intermittent flow demonstrates that these streams do not contain the fisheries resources that would need protection with the use of timing restrictions.
16b	-provide a site-specific description of construction methods to be used during the respective time windows; and	RR2 Section 2.2.9 ECP Section 5	For all streams with discernable flow at the time of crossing, a dry-crossing technique will be used during construction. Dry-crossing techniques to be used are described in Section 5 of Tennessee’s ECP and in Section 2.2.9 of Resource Report 2.

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Number	Data Request	Response Location	Summary of Response
Resource Report 2			
16c	-provide record of correspondence with applicable state agencies that indicates time restrictions are not applicable for a specific waterbody.		Consultation with State agencies did not provide information on timing restrictions. Timing restrictions in Pennsylvania were applied to perennial streams with a water quality and/or fishery classification. Dates for timing restrictions in Pennsylvania are consistent with those outlined in the FERC Procedures. Timing restrictions in New Jersey were applied to perennial streams with a water quality and/or fishery classification. Dates for timing restrictions in New Jersey are consistent with those outlined in N.J.A.C. 7:13.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
Resource Report 2			
17	Identify which waterbodies TGP considered crossing by the HDD method and summarize the geotechnical information used to evaluate the feasibility of each HDD crossing considered. Detail TGP's confidence in the successful use of the HDD method where proposed and provide the geotechnical studies/reports prepared for the proposed HDDs when available.	Resource Report 2 Section 2.2.9	Three HDDs are proposed for this project, all in Loop 325: Wetland (MP 5.41 – MP 5.83), Lake Conway/Hwy 515 (MP 5.83 - MP 6.50), and Monksville Reservoir (MP 15.99 – MP 16.90). Geotechnical engineering recommendations were provided by GeoEngineers, Inc. for all crossings. For the Wetland and Lake Conway/Hwy 515 crossings, the geotechnical reports state that the “crossings are geometrically and technically feasible”. The Monksville Reservoir geotechnical report is pending, however, GeoEngineers has provided an HDD crossing design under the assumption that much of the drill is in rocky conditions, which the field data supports.
18	Provide typical or site-specific drawings for the in-line partial block configuration of a coffer dam and the full span coffer dam crossing methods discussed in section 2.2.9.1	Volume II - Appendix C	Reference Typical Drawings DPCA and DPCB – Dam Pipeline Crossing in Appendix C.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
Resource Report 2			
19	Identify any chemical which would be added to the hydrostatic test water, its concentration at discharge, and the proposed treatment and/or disposal method for the discharge.	Resource Report 2 Section 2.2.5	Tennessee does not anticipate the use of any additives within the hydrostatic testwater. Should it be determined that additives are necessary based on the source and composition of the testwater, Tennessee shall submit detailed information on any chemicals, such as concentration at discharge and proposed treatment / disposal methods, to the Commission for review and approval prior to use.
20	A number of potential hydrostatic test water sources have high water quality or fisheries classifications such as High Quality, Wild Trout Streams, etc. Provide a copy of consultation with appropriate state agencies and/or commissions giving TGP permission for its proposed withdrawal and discharge locations in accordance with FERC’s Procedures, sections VII.C.2 and VII.D.2.	Resource Report 2 Section 2.2.5	Tennessee anticipates filing applications with state agencies for hydrostatic testing subsequent to submittal of this Environmental Report. In accordance with Sections VII.C.2 and VII.D.2 of the Commission Procedures, hydrostatic test water will not be obtained from, or discharged to, high quality streams unless approved by the applicable state permitting agency, as detailed in Section 4.1.5 in Tennessee’s ECP. Tennessee will provide the Commission with any correspondence and/or permit approvals from state regulatory agencies for the withdrawal and/or discharge of water from/to high quality streams. If withdrawal/discharge of testwater within HQ streams/watersheds is not permitted by the applicable state agency, Tennessee will submit to the Commission any change in the source and/or discharge location for hydrostatic testwater.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
Resource Report 2			
21	Develop a well testing plan that indicates how TGP would test wells both before and after construction to determine if any wells within 150 feet of the construction work area may have been impacted by the Project	Resource Report 2 Section 2.1.4 Volume II – Appendix C (ECP Section 5.1)	Tennessee is researching available public data bases and has inquired of the affected landowners to determine the location of public and private water supplies (wells). Owners of wells identified that are within 150 feet of the construction work area shall be offered pre-and post construction well testing. This testing shall be conducted by a qualified independent inspection service and shall include tests of water quality and in the case of shallow dug wells or springs, sufficient analysis on quantity to determine if pipeline construction has created an impact. In the event where it is determined that permanent impacts have occurred to a well, Tennessee shall repair or replace the well, to as near pre-construction condition as possible.
22	Indicate if the surface water intake on Stillwater Reservoir is located upstream or downstream of the proposed crossing. Also, provide the status of consultation (including any correspondence) with the U.S. Army Corps of Engineers (COE) concerning the proposed crossing method for Stillwater Reservoir.	Resource Report 2 Section 2.2.4.1 Resource Report 8 Section 8.5	The surface water intake on Stillwater Reservoir is located downstream of the proposed crossing. The ACOE was provided copies of the Draft ER filed with the Commission on March 27, 2009, and will be provided copies of this Final ER as part of the certificate application for the Project. Tennessee will continue to consult with the ACOE regarding crossing of federal lands in the Project area.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
Resource Report 2			
23	The wetland revegetation monitoring specifications in section 5.12.1.6 of the ECP differ from the FERC Procedures. Clarify if TGP intends to implement wetland revegetation monitoring differently than recommended by the FERC and, if so, describe and justify this alternative measure in the appropriate section of Resource Report 1.	Volume II – Appendix D (ECP Section 5.12.1.6)	The wetland revegetation monitoring specifications in section 5.12.1.6 of the ECP have been edited to reflect those required by the 2003 FERC Procedures. Tennessee will implement wetland monitoring as outlined in the FERC Procedures, and with any additional measures as required by applicable State agencies.
24	Describe how TGP would determine whether mats would be placed over existing vegetation in the first bullet point of section 5.12.2.3 of the ECP	Volume II – Appendix D (ECP Section 5.12.2.3)	Timber mats may be placed over existing herbaceous vegetation where grading is not required and trees and/or woody species have been cleared.
25	Item 4 of ECP section 9.2 refers to construction right-of-way widths in wetlands and to exceptions contained in section 6.0 of the ECP. However, section 6.0 of the ECP does not contain any wetlands information. Revise the ECP to include the wetland construction right-of-way width exceptions referred to in item 4 of section 9.2.	Resource Report 2 Table 2.3-16 Volume II – Appendix D (ECP Table 9.2-6)	Areas where greater than 75 feet of construction workspace is proposed within wetlands are identified in Resource Report 2 Table 2.3-16 and in Tennessee’s ECP Table 9.2-6.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
1	Clarify the discrepancy between TGP's proposed time windows for in-stream activities in waters supporting coldwater and warmwater fisheries in section 5.13.1.1 of TGP's ECP and section 3.1.3 of DRR 3. Ensure that time windows are consistent with the FERC Procedures or in accordance with the applicable state's regulation.	Resource Report 3 Table 3.1-4 Resource Report 2 Table 2.2-3 through Table 2.2-9 ECP Section 5.13	Construction windows for fisheries have been edited in RR3, RR2 and the ECP to reflect construction dates in the 2003 FERC Procedures for crossings in Pennsylvania, and to reflect construction dates in N.J.A.C 7:13 for crossings in New Jersey.
2	Discuss the feasibility of crossing the Wallkill River via HDD and provide an environmental analysis comparing the HDD method and the proposed open cut crossing method.	Resource Report 2 Section 2.2.7.7.1	The subsurface geology and hydrology could be a detriment to the HDD installation method due to the possibility of a drilling slurry "frac out" pressure rupture occurrence.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
3	Provide more detail on Pennsylvania State Game Lands in section 3.2.3.1.2, such as what species are present and why the area is being managed as State Game Lands. Consult with the land managing agency to obtain recommendations on construction methods or best management practices for these properties.	Resource Report 3 Section 3.2.3.1.2	State Game Land 116 is located near Lackawaxen in Pike County, Pennsylvania. This parcel of land is approximately 3,024 acres in size and is managed by the Pennsylvania Game Commission (PGC) for hunting and other recreational opportunities. In correspondence dated October 29, 2008, the PGC determined that the 300 Line Project should not cause any adverse impacts to any special concern species of birds or mammals recognized by the PGC. Pennsylvania Fish and Boat Commission (PFBC) and PA DCNR also did not identify any other animal or plant species requiring survey considerations. PGC did recommend that the necessary coordination be conducted with the current Land Management Supervisor to obtain the approval to locate the project on State Game Land.
4	Regarding the Wallkill River National Wildlife Refuge (WRNWR), quantify the Project’s impact (temporary and permanent acreages) on each of the habitats described in section 3.2.4.1.	Resource Report 10 Table 10.3-3 Resource Report 8 Table 8.1-4	Analysis of impacts to the Wallkill are presented in Table 10.3-3. Impacts on major cover types are provided in Resource Report 8 Table 8.1-4.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
5	The last paragraph of section 3.2.4 states that construction right-of-way would be restricted in forested and scrub-shrub habitats to the smallest width practical given site-specific conditions. Ensure that any proposed width restrictions are depicted on alignment sheets and applicable right-of-way configuration diagrams.	Volume II - Appendix C Volume II - Appendix O Resource Report 3 Section 3.2.4	Tennessee and its construction contractors will strive to minimize impacts to wildlife by expediting construction to the greatest extent possible. Conversion of forest and scrub-shrub habitats, particularly in wetlands, will be minimized by adhering to construction ROW widths and vegetation maintenance strips as outlined in Tennessee’s ECP
6	Provide a table that quantifies the impacts to each type of resource in section 3.3.1 and provide a discussion of the commercial, recreational, and aesthetic values of each.	Resource Report 8: Section 8.1.4.1 Table 8.1-4 Table 8.1-5 Section 8.3	Section 8.1.4.1 of Resource Report 8 describes the impacts associated with each type of resource included in section 3.3.1 of Resource Report 3. This section identifies the percent of total project impacts on each resource area, the total number of miles of each resource area that will be affected by the Project, and the total number of acres of each resource that will be affect during construction and operation of the Project. Additionally Tables 8.1-4 and 8.1-5 of Resource Report 8 outline land use impacts of the resource areas listed in section 3.3.1 by pipeline loop segment. Section 8.3 of Resource Report 8 identifies and provides a discussion of the commercial, recreational, and aesthetic values associated with the resource areas crossed by the Project.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
7	Explain how TGP would determine whether rubber tires would damage root systems in section 3.3.4.1.	Resource Report 3 Section 3.3.4.1	The Environmental Inspector would determine whether or not rubber tired equipment would damage root systems by surveying the wetland ahead of clearing equipment for degree of saturation.
8	Section 3.2.2.1 discusses a Grassland Breeding Bird Habitat Management Study in which the WRNWR is participating. Verify whether or not the Project crosses grasslands used in this study. If the Project crosses these areas, discuss measures developed in consultation with the land managing agency to reduce or eliminate impacts to the goals of this program.	Resource Report 3 Section 3.2.2.1	While the Project does cross grassland areas within the NWR, Tennessee will coordinate with NWR staff to incorporate impact avoidance measures such as winter clearing and construction windows to avoid impacts to grassland nesting bird species.
9	Although no bald eagle nests are known to occur in the Project area, the Project is in the known range for bald eagles. Provide measures to be taken in the event that bald eagle nests are identified during additional field surveys to be conducted in spring and summer 2009 or during construction. Provide information on who would be contacted and any buffer zones that would be adopted to avoid impacts on nesting bald eagles.	Resource Report 3 Section 3.4.2	Contact the PA and/or NJ USFWS Field office and the NJ Natural Heritage Program and/or the PA DCNR PNDI. Follow the USFWS 2007 “National Bald Eagle Management Guidelines”.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
10	Provide information with maps identifying the exact location of the Upper Delaware Important Bird Area and identify typical migratory bird species which utilize this area for breeding. Identify any potential impacts to bird species occupying this area and any possible mitigation measures to minimize impacts on these species.	Resource Report 3 Attachment A Figure 3.2-1 Section 3.2.3.1.3 Table 3.2-4	Loop 323 of Tennessee’s 300 Line Project generally runs parallel to the IBA and crosses the IBA from MP 1.96 to MP 2.88 and MP 3.55 to MP3.97. As part of the U.S. Army Corps of Engineers permitting process, Tennessee will be submitting a bird survey that addresses adverse impact to the Upper Delaware Important Bird Area and other ecologically important areas not within or immediately adjacent to the Project area but that could be impacted by the Project.
11	Provide more information on potential impacts on migratory birds in the project area from vegetation clearing. Include an impact analysis, avoidance measures (such as timing restrictions), BMPs that would be implemented to minimize impacts, mitigation measures proposed by TGP, and any applicable mitigation required by federal or state agencies.	Resource Report 3 Section 3.2.4	Tennessee does not anticipate adverse impacts to migratory bird populations as a result of Project construction and operation. Habitat loss has been minimized to the extent practicable by co-locating the loop segment adjacent to the existing 300 Line and disturbance will be minimized by adhering to Tennessee’s ECP and expediting construction to the extent practicable. Additionally, dependent upon final consultation with the USFWS relative to Indiana bat avoidance measures, winter season tree clearing may be implemented, which would mitigate potential impacts to migratory birds in addition to bat populations. No other timing restrictions or other mitigation measures pertaining to vegetation clearing have been requested by Federal or state agencies relative to migratory birds.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 3			
12	Provide more information on the Tillery Greenway adjacent to Compressor Station 303. Determine the distances from the compressor station to the greenway and any significant wetland resources or biologically diverse areas present.	Resource Report 8 Section 8.3.1.2	Approximately 0.20 acres are within the fenced area of the compressor station. This is the area where the existing ROW is located, therefore there will be no significant impacts to the Greenway
13	Provide an Invasive Species Plan describing how TGP would minimize the potential for introducing invasive plant species, how TGP would monitor the right-of-way for invasive plant species, and what measures TGP would implement to mitigate invasive plant species if found colonizing the right-of-way.	Resource Report 3 Attachment B	An Invasive Species Plan has been provided.
14	The Pennsylvania Department of Conservation and Natural Resources requested that surveys be conducted for the Eastern hognose snake. This species is not included in the list of state listed species to be surveyed (Table 3.4-2).	RR3 Section 3.4.1.2	According to the PFBC, the Eastern hognose snake (<i>Heterodon platirhinos</i>) currently has a state status of abundant, and receives no special protection within Pennsylvania. Tennessee has submitted a response letter to the PFBC in regard to the survey request for this non-listed species. If survey for the Eastern hognose snake is required, Tennessee will ensure that all surveys are conducted in accordance with the specific survey procedures outlined by the PFBC.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 4			
1	Provide any previously unfiled correspondence (including any enclosures/attachments, in color if originally provided in color), meeting notes, phone logs, etc. to and from the New Jersey and Pennsylvania State Historic Preservation Offices (SHPO), including SHPO comments, as appropriate, on the report and unanticipated discoveries plan.	Resource Report 4 Attachment 4A	All previously unfiled correspondence to and from the New Jersey and Pennsylvania SHPOs is provided in Attachment 4A.
2	Contact the Morris County Trust for Historic Preservation, as requested in their scoping comments, and provide the Commission with a record of any subsequent consultation.	Resource Report 4 Attachment 4A	The Morris County Trust for Historic Preservation has been contacted; the appropriate correspondence is provided in Attachment 4A.
3	Update table 4.3-1 or provide an additional table that identifies the Area of Potential Effect (APE) for compressor stations, pipeyards, contractor yards, access roads, and any other ancillary areas, and their acreage (compressor stations and pipeyards) or length and width (access roads).	Resource Report 4 Table 4.3-1 Table 4.4-2 Table 4.4-4 Table 4.4-7 Table 4.4-10 Table 4.4-13 Table 4.4-16 Table 4.4-19	Tables have been updated and added to include all pipe and contractor yards, compressor stations, cathodic protection areas, access roads, and additional temporary work spaces by loop including acreage or mileage.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 4			
4	Section 4.3.2, paragraph 3 states that in areas where new above ground resources are proposed, the APE would be expanded to account for potential visual effects. Provide a schedule for the expanded visual effects study. The study should include the methodology for determining the APE; maps depicting the APE with any existing structures within the APE identified; and an assessment of the effects of the proposed above ground facility on any historic structures within the APE. Provide SHPO comments on the study.	Resource Report 4 Section 4.3.2 Section 4.4.1.1 Volume IV – Appendix S	In areas where new aboveground resources are proposed, the APE will be expanded to account for potential visual effects upon any historic properties, should they exist. In general, the extent of the APE in these instances will be determined by completing a viewshed analysis of the area, based upon the height of the tallest proposed structure. It is estimated that the tallest structure will be 60 ft. in height and that the associated APE will measure approximately 0.25 mi. in diameter. Phase I surveys are complete for the new Compressor Stations 303 and 310.
5	In section 4.4.1, include the breakdown for each state of high, moderate, and low probability areas (miles/percent) and/or provide maps that indicate the probability levels.	Resource Report 4 Section 4.4.1	Section 4.4.1 has been updated to include the percentage breakdown of areas tested at high, medium, and low probability for each state.
6	In section 4.4.1.2, provide the summary text for Loop 313 (the text is missing, but the header is present).	Resource Report 4 Section 4.4.1.2	The appropriate summary text for Loop 313 has been provided in section 4.4.1.2.
7	Throughout section 4.4.2.2, for each finding of no adverse effect, either provide SHPO concurrence or revise the text to state that Gray & Pape recommends no adverse effect.	Resource Report 4 Section 4.4.2.2	Section 4.4.2.2 has been revised for each finding of no adverse effect, with a Gray & Pape (project cultural resource consultant) recommendation of no adverse effect.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 4			
8	The properties referenced in table 4.4-18 have been recommended as not eligible for listing on the NRHP; however the text indicates that they might be counted as contributing elements in a multi-property listing. Assess the NRHP-eligibility of the property as a whole, and if eligible, provide an assessment of these buildings as contributing elements.	Resource Report 4 Section 4.4	The property in question (on Beisel Beck Road, Lackawaxen, Loop 323) has been dropped from consideration for location of a temporary pipe storage yard. Any assessment and consideration of the structures on the property for NRHP-eligibility will no longer be a part of this report filing. The text in section 4.4 has been edited to reflect this change.
9	Section 4.4 states that the Pennsylvania and New Jersey SHPOs require that a geomorphologist be retained to identify deep test locations and that TGP plans to undertake this work in the Spring of 2009. DRR 4 includes the locations that have been identified as deep test locations for each loop. Describe how these locations were identified, and how the methods meet the requirements of the Pennsylvania and New Jersey SHPO.	Resource Report 4 Section 4.4	A geomorphologist was retained, and the geomorphology fieldwork was conducted in the Spring of 2009. Section 4.4 has been updated with soil profile descriptions for each of the deep test locations, including information on how locations were selected and how the methodology employed meets the requirements of the Pennsylvania and New Jersey SHPO.
10	Include in section 4.5 the proportion (mileage/percent) of the Overview and Identification surveys completed for each element of the Project (e.g., compressor stations, access roads, pipeline loops) in each state. Also provide a summary of and schedule for completing all outstanding cultural resources surveys and investigations including Phase I field completion, Phase II fieldwork, geomorphological fieldwork, and subsequent reporting, and for SHPO review and comment in Pennsylvania and New Jersey.	Resource Report 4 Table 4.3-1 Section 4.5 Volume IV – Appendix S	The information provided in Table 4.3-1 of the mileage or acreage by loop for each state has been reiterated in section 4.5. In addition, section 4.5 now includes a schedule based upon current information for additional Phase I and Phase II fieldwork, as well as a report date and an anticipated timely review and comment by the Pennsylvania and New Jersey SHPO.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 4			
11	Indicate whether any sites identified as eligible for listing on the National Register of Historic Properties (NRHP) would be avoided or mitigated.	Resource Report 4 Section 4.5	At this time, no National Register-eligible sites have been identified for the Project as of the date of this resource report. However, if and when National Register-eligible sites are identified, Gray & Pape will work with the BHP and HPO on the appropriate avoidance or mitigation efforts. Any judgment made regarding eligibility will be made with the guidance of the SHPOs.
12	Provide archaeological survey maps for any non-linear survey areas (e.g. compressor station sites, pipe yards) that were not previously provided in the survey report.	Volume IV -Appendix S	Volume IV - Appendix S includes survey maps of all non-linear areas, overlaid on USGS topographic maps organized by loop and state, that were not previously provided in the survey report
13	Provide a table or maps that indicate where the surveyed corridor width exceeded the typical 250-foot-wide corridor.	Resource Report 4 Table 4.3-2	Table 4.3-2 has been inserted. They include the beginning and ending mile posts for areas where the survey corridor exceeded the standard width for each loop and by state.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 5			
1	Describe the Project’s projected economic benefits for each county crossed by the Project.	Resource Report 5 Section 5.3	Information on the following has been added to Section 5.3: Property Tax Revenues, Land Leases, Local Construction Jobs, Local Expenditures (multiplier effect), Gas Supply Diversification and Price Competition

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 6			
1	Provide details in the Blasting Plan (and in any other appropriate sections of the resource reports) for rock disposal that does not include windrowing along the right-of-way.	Volume II - Appendix D (ECP Section 4.1.2.3) Resource Report 6 Section 6.2	The Blasting Plan does not address rock disposal. Details for rock disposal are included in Tennessee’s ECP (Section 4.1.2.3) and in Resource Report 2 Section 6.2.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 6			
2	Detail any additional protective measures TGP would utilize in areas designated as having severe erosion potential.	Resource Report 6 Section 6.4	<ul style="list-style-type: none"> •minimize the quantity and duration of soil exposure; •closer spacing of water bars to reduce the velocity of and redirecting runoff; •increase the number of trench plugs during construction; •install and maintain jute netting to aid in site stabilization; •reestablish vegetation as soon as possible following final grading; and, •frequent inspection the ROW and maintain erosion and sediment controls as necessary until final stabilization is achieved.
3	Confirm that Loop 325 would not cross any active faults.	Resource Report 6 Section 6.4	Loop 325 does not cross any active faults. There are no active faults in New Jersey (Dalton 2008).

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 7			
1	Provide the acreage of construction and operation impacts for each map unit listed in table 7.2-1 and table 7.2-2.	Resource Report 7 Table 7.2-1 Table 7.2-2	Construction and operation impacts have been added to Table 7.2-1 and Table 7.2-2
2	Provide soils data, similar to table 7.2-1, for the proposed staging areas, pipe yards/contractor yards, access roads, main line valves, and pig launcher/receiver facilities. As stated above, provide the acreage of construction and operation impacts for each map unit identified.	Resource Report 7 Table 7.2-3 through Table 7.2-5	Tables 7.2-3 to 7.2-5 have been added to Resource Report 7 to identify the soils series and construction and operation impacts related to pipe/contractor yards, mail line valves, pig launchers/receivers, and access roads associated with the 300 Line Project.
3	Provide additional information about the criteria used to determine erosion potential, compaction potential, potential to introduce rock to topsoil, and revegetation potential. Where applicable, provide a specific definition of each class (e.g., severe) identified.	Resource Report 7 Tables 7.1-1 to 7.1-8, 7.2-1 and 7.2-2 Tables 7.3-1 to 7.3-8	Footnotes have been added to the Tables defining the criteria used to determine the noted soil characteristics.
4	Identify the Wind Erodibility Group classification for each of the soil map units identified in tables 7.1-1 to 7.1-8, 7.2-1, and 7.2-2.	Resource Report 7 Tables 7.1-1 to 7.1-8, and 7.2-1 and 7.2-2	The soils assigned to group 1 are the most susceptible to wind erosion, and those assigned to group 8 are the least susceptible.
5	Describe any consultations with the Natural Resource Conservation Service (NRCS) to identify appropriate seed mixes for post-construction revegetation. If no correspondence has been conducted to date, provide a schedule of when the NRCS would be contacted.	Volume II - Appendix B	Consultations to each applicable Natural Resource Conservation Service (NRCS) county field office were sent on June 2, 2009 via electronic mail regarding sensitive areas and recommended seed mixes for restoration activities.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
1	Provide a table showing land use by milepost for each pipeline loop.	Resource Report 8 Attachment B	A Table has been provided that includes land use listed by milepost
2	A discussion of valves and pig launcher/receiver sites should be carried through the entire land use section.	Resource Report 8 All Sections	Valve and Pig Launcher/Receiver sites are discussed through the entire land use section.
3	Provide Attachment A, Land Use and Protected and Recreational Open Space figures.	Resource Report 8 Attachment A Figures 8.1-1a through 8.1-1i and Figures 8.3-1a through 8.3-1i	Land Use and Recreational Open Space Figures provided in Attachment A of Resource Report 8
4	Identify by milepost and acreage any U.S. Department of Agriculture’s Conservation Reserve Enhancement Program lands affected by the planned pipeline and aboveground facility construction and operation. Also, describe the measures TGP would adopt to ensure farmers enrolled in this program are not disqualified as a result of Project construction and operation activities.	Resource Report 8 Section 8.3.2.1.3 Table 8.3-5	Tennessee would consult with the affected landowners and applicable regulating agencies to develop measures to ensure farmers enrolled in this program are not disqualified as a result of Project construction and operation activities. One CREP property identified on Loop 315.
5	Clarify if TGP intends to adopt the measures listed in a letter dated January 19, 2009 from Mr. Anthony Liguori, Bradford County Conservation District. Describe any other measures TGP would adopt specific to unique county lands.	Resource Report 8 Section 8.3.2.1.3	Tennessee shall incorporate these measures to the extent practicable and will continue to work with the County Conservation Districts through construction and restoration to ensure that agricultural interests are protected.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
6	Identify agencies contacted, as well as comparable information received from Sussex and Passaic Counties, New Jersey regarding specialty crops, grazing allotments, and Conservation Resource Protection lands.	Resource Report 8 Section 8.3.2.1.3 Volume II – Appendix B	NJ Dept. of Agriculture Sussex County Farmland Preservation and Open Space Passaic County Open Space Township Tax Assessor’s Offices – Farmland Assessment
7	Identify by tract any agricultural fields with drain tiles or irrigation systems.	Resource Report 8 Section 8.3.2.1.3	None have been identified.
8	Resolve the discrepancy between tables 8.1-3, 8.1-4, and 8.1-8, and the text in DRR 1 and DRR 8 concerning the amount of Commercial/Industrial land that would be disturbed.	Resource Report 8 Tables 8.1-4, 8.1-5 and 8.1-9	Tables 8.1-4 and 8.1-5 include impacts to comm./indus land from pipeline facilities; Table 8.1-9 includes impacts to comm./Indus land from pipe/contractor yards.
9	Revise table 8.1-5 to show only the transportation and utility rights-of-way that would be paralleled by the pipeline loops. The existing adjacent TGP right-of-way should be included. The amount of overlap of the new and existing rights-of-way should also be included.	Resource Report 8 Table 8.1-6	The Table has been revised to include the requested information.
10 a, b, c	Revise table 8.1-7 to include: a. the present condition of the access road (e.g., two-track, dirt, gravel); b. the existing land use for any new access roads or roads requiring modification; and c. any modification required (e.g., widening, grading, adding gravel).	Resource Report 8 Table 8.1-8	The Table has been revised to include the requested information

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
11	Provide a table similar to table 8.1-7 for all permanent access roads that extend beyond the area designated for permanent operation of the aboveground facility (including valves and launcher/receivers).	Resource Report 8 Table 8.1-8	Information provided in Table 8.1-8
12	Delete or justify footnote “c” in table 8.1-8.	Resource Report 8 Table 8.1-9	Table 8.1-9 quantifies temporary and permanent impacts from contractor yards and pipe/staging areas associated with the 300 Line Project. Footnote c has been deleted.
13	Explain how the Project would: a. temporarily impact railroads without crossing them; and b. permanently impact 2.66 acres of waterbodies.	Resource Report 8 Table 8.1-4	Impact numbers have been updated in the Final ER in Table 8.1-4. Temporary impacts to railroads include areas where temporary workspace parallel the railroad ROW but do not cross the railroad and permanent impacts to waterbodies include slope stabilization.
14	Resolve the discrepancies between the text in section 8.2.1.1.7 and table 8.2-1. Update the planned starting date for each development. Indicate on table 8.2-1 the distance from the pipeline loop construction work area, as well as the centerline of the pipeline, and any planned permanent structure within the development. If available, provide plots for the permitted developments. Discuss how TGP proposes to avoid conflicts with these developments.	Resource Report 8 Section 8.2.1.1.7 Section 8.2.1.1.8 Table 8.2-1.	Discrepancies between the text and Table 8.2-1 have been resolved in Resource Report 8. Applicable agencies were contacted regarding updated planned starting dates for development and construction start dates within the table were modified where available. The updated Table 8.2-1 and discussion regarding construction have been added to Resource Report 8.
15	Provide a table that lists all road crossings that would be open cut during construction of the Project.	Resource Report 8 Table 8.1-2	Table 8.1-2 in Resource Report 8 provides information on open-cut road crossings for the 300 Line Project.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
16	<p>There are discrepancies between the information provided in table 8.2-2 and the site-specific residential mitigation plans provided for all loops. These include, but are not limited to, the following examples:</p> <ul style="list-style-type: none"> • table 8.2-2 shows line list numbers 2036.00 and 2068.00 within Loop 315 but there is no site-specific plan; • site-specific plans are provided for line list numbers 2025.00, 2040.00, and 2067.00 within Loop 315 but these residences are not listed in table 8.2-2; • within Loop 319 a site-specific plan is provided for line list number 4106.00, but this line list number is not shown in table 8.2-2; • within Loop 325, site-specific plans are provided for line list numbers 7003.00, 7029.02, and 7108.00, but these line list numbers are not included in the table; • within Loop 315, table 8.2-2 shows line list number 2066.00 as 42 feet from the construction right-of-way, but the site-specific plan shows 28 feet; and • within Loop 325, table 8.2-2 shows line list number 7030.00 as 15 feet from the construction right-of-way but the site-specific plan shows 10 feet. <p>Additional discrepancies between the distance to edge of workspace and pipeline centerline provided in the table and the distance shown on the site-specific plans are present within most of the loop segments. Resolve these discrepancies.</p>	<p>Resource Report 8 Table 8.2-2 Volume IV - Appendix U</p>	<p>The residential site specifics have been updated and the subject tables have been revised to resolve the discrepancies.</p>
		July 2009	

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
17	<p>Update the site-specific construction plans for all residences within 50 feet of the construction work areas to:</p> <ul style="list-style-type: none"> a. indicate the crossing method; b. provide a scaled plot plan showing all areas to be disturbed and the location of all structures, including (if applicable): <ul style="list-style-type: none"> i. septic systems; ii. wells; iii. driveways; iv. pools; and v. large landscaping features such as trees; and c. in areas where TGP would cross multiple residences within a subdivision, also include site-specific plans for crossing the subdivision including scaled plot plans showing: <ul style="list-style-type: none"> i. all areas to be disturbed; ii. plans for crossing any existing infrastructure, such as roads, septic systems, utilities, trails, and sidewalks; iii. provide a revegetation plan for any areas of proposed tree cutting outside the permanent right-of-way in heavily populated residential areas (such as additional temporary workspace). 	Volume IV - Appendix U	These updates have been made and are located in Volume IV – Appendix U

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18	Provide a copy of the grazing deferment plan.		Tennessee has not prepared a grazing deferment plan and will work directly with affected landowners relative to grazing deferment.
19	Provide an update on the status of consultations with the Bureau of Land Management, COE, and U.S. Fish and Wildlife Service on the crossing of federal land.	Resource Report 8 Section 8.5	<p>BLM: Tennessee is working with Carol Grundman with the Eastern District BLM located in Milwaukee, Wisconsin. Tennessee has provided her with the names and contact information of the individuals we have been working with at the ACOE and the Walkkill River National Wildlife Refuge. Tennessee has also provided Ms. Grundman with electronic copies of “Application of Tennessee Gas Pipeline Company for a Certificate of Public Convenience and Necessity, FERC Docket No. PF09-1, 300 Line Project (Pennsylvania and New Jersey) Vol. IIB-Draft Env. Report, Vol. IIA-RR 1-13, IIB-App. A-K Public”.</p> <p>COE: Our Contacts at the Corps are Craig Homesley, Real Estate Division and Lacy Evans, Environmental. Mr. Homesley has been working with us regarding access for various surveys. Ms. Evans has been provided and is reviewing the same information provided to Ms. Grundman and listed above.</p> <p>US Fish & Wildlife: Contacts are Mr. Ed Henry, Manager, Walkkill River National Wildlife Refuge and Mr. Dan Stotts, Biologist. We have met with these individuals regarding access for various surveys. A follow up meeting is scheduled for May 28, 2009.</p>

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 8			
20	Identify by tract any Green Acres properties in New Jersey. Identify any mitigation TGP proposes to use on these properties.	Resource Report 8 Table 8.3-2 Section 8.3.1.1.2	Green Acres Tracts have been updated in the Resource Report 8 Table 8.3-2. Tennessee will continue to coordinate with the applicable agencies to prepare required applications and mitigation plans for any work associated with the Project that would affect Green Acres properties crossed by Loop 325. The goal in all cases will be to minimize tree clearing. Additionally, Tennessee will implement its ECP during construction to prevent adverse impacts to Green Acres properties.
20	For all public land, recreation, and other designated areas listed in sections 8.3 and 8.5, provide: a. a discussion of the purpose of the public interest area crossed;	Resource Report 8 Section 8.3 Table 8.3-3	Public interest and purpose information has been added to the text and/or Tables in Resource Report 8.
20b	a description of what would be crossed within the public interest areas (e.g., trails, roads, campgrounds, waterbodies used for boating/fishing); and	Resource Report 8 Section 8.3 Table 8.3-3	A description of what would be crossed within the public interest area has been included in the Public Land Table in Resource Report 8 Section 8.3.
20c	a site-specific plan for crossing the public interest area developed in consultation with the managing agency. This plan should detail timing restrictions, construction techniques, maintaining safe public access to the public interest area, restoration/revegetation, and any proposed mitigation.	Volume IV – Appendix V	Public Land site specific drawings have been developed and are provided in Volume IV – Appendix V.

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21	Identify by tract any property enrolled in the Clean and Green Program. Describe any impact the Project would have on landowner’s continued participation in the program. Discuss any mitigation TGP proposes for these properties.	Resource Report 8 Section 8.3.1.1.2 Table 8.3-1	Tennessee will work with Clean and Green program landowners and will implement its ECP to minimize impacts to agricultural lands crossed by the proposed pipeline loops located in Pennsylvania.
22	Identify any land zoning at the new compressor station sites.	Resource Report 8 Section 8.1.2	Zoning at Compressor Station 303 is Agricultural. There is no zoning at Compressor Station 310.
23	Address any comments from the Pennsylvania Game Commission and the Pennsylvania Bureau of Forest on the impacts on hunting from construction on state lands.	Resource Report 8 8.3.5	During the initial survey the DCNR’s Dave Mong and PA Game Commission, John Sutkufski requested that survey work not be performed on opening days and Holiday weekends during hunting season. While Tennessee was able to address their concerns and avoid those dates during initial survey, Tennessee has not yet developed the construction schedule and as such has not identified potential impacts to these dates. Once the schedule has been outlined, Tennessee will meet with both DCNR and the Game Commission to make further refinements or mitigations as may be necessary to avoid impacts to hunters or designated hunting seasons.
24	Update table 8.3-1 to include land use type(s) affected. Be sure to include special use recreation areas such as golf courses, ski areas, and hiking trails.	Resource Report Table 8.3-3	Table 8.3-3 has been updated to include land use type(s) affected and special use Recreation areas

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25	Provide the safety measures TGP would implement in proximity to the proposed AES Wind Farm. These include such things as locating underground cables and measures to mitigate effects of lightning strikes to the wind turbines.	Resource Report 8 Section 8.2.1.1.8	Tennessee Gas Pipeline Operations identified the need for potential AC mitigation relative to lightning strikes related to the AES Wind Farm and is currently taking steps to mitigate these risks. There is a project underway which encases the AC electrical cables from the wind farm in red concrete and encases the ground wires in plastic conduit the entire width of the right-of-way to reduce the effects from the TGP cathodic system and deter the pipeline from becoming part of the wind farm grounding system.
26	Describe how TGP would ensure that the Delaware State Forest would not lose its certification from both the Forest Stewardship Council and the Sustainable Resource Initiative.	Resource Report 8 Section 8.3.5	Tennessee will apply to the PA DCNR for a waiver for the portion of the Project that is within the Delaware State Forest. The ECP and the PA DEP Erosion and Sediment Pollution Control Program Manual (April 2000) will be implemented and strictly enforced throughout all wetland and waterbody crossings.
27a	Concerning table 8.1-6, TGP should: justify the size of the additional temporary workspace at MP 6.22-6.32 on Loop 315;	Resource Report 8 Table 8.1-7	Area of ATWS is 54,359sf or 1.25 acres. Justification is wetland staging area, access road and test manifold.
27b	ensure that all additional temporary workspaces that are on the alignment sheets are included in the table;	Resource Report 8 Table 8.1-7	Table 8.1-7 in Resource Report 8 has been updated.

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RESOURCE REPORT 8			
27c	explain further what footnote “r - narrow construction” means; and	Table 8.1-7 (footnote)	Narrow construction refers to areas along the alignment where construction workspace is limited due to topography and/or existing development such as residences, commercial/industrial structures and roadways. Additional Temporary Workspace is needed outside of these constrained construction areas for construction staging and to stockpile excavated soil.
27d	ensure that all footnotes apply to the appropriate site-specific justification for the additional temporary workspaces.	Table 8.1-7	All footnotes apply to the appropriate site-specific justification for the ATWS.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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1a	Describe the local climate and supporting climate data for the Project area. Information should include, but not be limited to: Historical maximum, minimum, seasonal and annual average: i. temperature data; ii. prevailing wind direction and wind speed data and representative wind rose plots; and iii. precipitation data;	Resource Report 9 Attachment D	As requested by FERC, TGP analyzed data from representative meteorological stations for the calendar year 2008. This meteorological data, including wind roses, are presented in Attachment D.
1b	Monitored concentrations of criteria air pollutants; and	Resource Report 9 Attachment E.	Representative criteria pollutant air quality monitoring data was collected from EPA’s AirData web site and is summarized in Attachment E.
1c	Information identifying the specific meteorological station(s) and pollutant monitoring station(s) used to collect the data for a) and b) above including the direction and distance from Project area.	Resource Report 9 Attachment D Attachment E.	The relevant distance and direction of the meteorological and ambient air quality monitoring stations from the Project area are included in the respective attachments.
2	Provide a table that shows the National Ambient Air Quality Standards and the Pennsylvania and New Jersey Ambient Air Quality Standards.	Resource Report 9 Table 9.1-21 and Table 9.1-22	Table 9.1-21 and Table 9.1-22 provided.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 9			
3	Provide a copy of the Minor Source Plan Approval submitted to the Pennsylvania Department of Environmental Protection (PADEP) to authorize the installation and operation of Compressor Stations 303 and 310. Information should include detailed supporting information documenting the assumptions, methodologies, and emission factors used to estimate emissions of Criteria Air Pollutants and Hazardous Air Pollutants from the emission sources to be installed and operated at the stations.	Resource Report 9 Section 9.1.1.4	Tennessee is in the process of preparing separate Plan Approval applications for Compressor Stations 303 and 310. These applications are scheduled to be submitted in November/December 2009. TGP will provide copies of the applications to FERC when they are submitted to the Pennsylvania Department of Environmental Protection (PADEP).
4	Provide an analysis of the predicted impacts of nitrogen oxides, carbon monoxide, particulate matter less than 10 microns in diameter (PM10), and particulate matter less than 2.5 microns in diameter (PM2.5) resulting from operation of Compressor Stations 303 and 310 that demonstrates compliance with the applicable National Ambient Air Quality Standards.	Resource Report 9 Section 9.1.1.4	As minor sources, the potential emissions from both facilities are below the significant emission threshold for each of the five respective pollutants mentioned above, therefore, by definition, the predicted air emission impacts from operation of the proposed facilities will be minimal and in compliance with the National Ambient Air Quality Standards.
5	Provide a copy of any correspondence submitted to the PADEP notifying them of the installation of the new 6,500 hp electrical powered compressor at Compressor Station 313 and subsequent removal of Unit ID P110.	Resource Report 9 Section 9.1.3.4	TGP is in the process of preparing the Plan Approval application for Compressor Station 313. The application is scheduled to be submitted in November/December 2009. TGP will provide a copy of the applications to FERC when it is submitted to PADEP.

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6	Provide a copy of the minor modification application submitted to the PADEP to authorize the installation and operation of the new turbine and emergency generator and removal of the existing turbine (Unit ID 101) and emergency generator (Unit ID Aux1) at Compressor Station 315.	Resource Report 9 Section 9.1.4.5	TGP is in the process of preparing the Plan Approval application for Compressor Stations 315. The application is scheduled to be submitted in November/December 2009. TGP will provide a copy of the applications to FERC when it is submitted to PADEP.
7	Provide a copy of the correspondence submitted to the PADEP requesting voidance of the existing Title V Operating Permits for Compressor Stations 315 and 321.	Resource Report 9 Section 9.1.4.5 Section 9.1.7.5	These requests are incorporated into the respective Plan Approval applications for Compressor Stations 315. TGP will provide FERC copies of the applications when they are submitted to PADEP. CS 321 - A request to void the current Title V Permit and issue a State-Only Minor Operating Permit is part of the Plan Approval application submitted to PADEP. This application was submitted to PADEP on May 22, 2009 and is provided in Attachment F.
8	Provide a copy of the Minor Source Plan Approval submitted to the PADEP to authorize the installation and operation of the proposed changes to Compressor Station 321. Information should include detailed supporting information documenting the assumptions, methodologies, and emission factors used to estimate emissions of Criteria Air Pollutants and Hazardous Air Pollutants from the emission sources to be installed and operated at the station.	Resource Report 9 Attachment F	This application was submitted to PADEP on May 22, 2009. It is provided in Attachment F.

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9	Provide a copy of the Title V Revision application submitted to the New Jersey Department of Environmental Protection to authorize the proposed changes to Compressor Station 325. Information should include detailed supporting information documenting the assumptions, methodologies, and emission factors used to estimate emissions of Criteria Air Pollutants and Hazardous Air Pollutants from the emission sources to be installed and operated at the station.	Resource Report 9 Attachment G.	This application was submitted to the New Jersey Department of Environmental Protection (NJDEP) on April 15, 2009. It is provided in Attachment G.
10	Per a comment from APA Watch, Inc, evaluate the feasibility of using electric powered compressor units at the new and modified compressor stations proposed to be operated using new natural gas-fired compressor units.	Resource Report 1 Section 1.1.2.2.1	303 & 310: Other locations up and down the pipeline system would offer poorer hydraulic performance and require additional pipeline looping which would increase the environmental footprint of the project. None of the sites that were available within the search zone were in close proximity to the necessary high voltage electric transmission lines required to power electric motors. 315, 321, and 325: utilize existing infrastructure. Gas fired units will allow service to continue during power outages, whereas service would be suspended with electric units.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 9			
11a	Attachment A: Emission Calculations – Construction of Compressor Stations. The following items were identified in each set of the compressor station emission calculations in: The table on page 2 of 7, which documents the representative construction equipment, fuel type, capacity (hp), criteria pollutant emission factors, and Emission Factor Reference (EFR) footnotes, needs to be updated to address or clarify the following:	Resource Report 9 Attachment A	Tennessee has revised the calculations that estimate emissions from construction of the compressor stations to respond to the comments above. The revised calculations are provided in Attachment A along with a matrix that identifies the response to each of the comments above, including the basis of the emission estimate.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 9			
11a	<ul style="list-style-type: none"> i. EFR 1 and EFR 4 are not associated with specific equipment in the table. EFR 2 and EFR 3 seem to supersede EFR 1 and EFR 4. ii. EFR 3 appears to apply to more equipment than the “Generator, welding truck, and x-ray trucks” identified in the note. iii. The EFRs need to be updated to specifically identify the Table, Model Year, Tier Level, Transient Adjustment Factor, and Deterioration Factor used to develop the criteria pollutant emission factors for each equipment type. iv. SO2 emission factors need to be included for all diesel equipment using the Sulfur Adjustment for PM Emissions emission calculation methodology presented in EPA guidance document EPA420-P-04-009 referenced in EFR 1 and EFR 4. v. Pollutant emission factors need to be included for the water pump. vi. The HC emission factor needs to be included for the generator. vii. The equipment types need to match the equipment types documented in the table on page 6 of 7. viii. Provide an explanation as to why the AP-42 Section 3.3 Stationary Source emission factors for the gasoline fired equipment is more appropriate than the emission factors that can be derived from the EPA guidance document titled “Exhaust Emission Factors for Nonroad Engine Modeling: Spark Ignition”, EPA420-R-05-019, December 2005. 	<p>Resource Report 9 Attachment A</p>	<p>Tennessee has revised the calculations that estimate emissions from construction of the compressor stations to respond to the comments above. The revised calculations are provided in Attachment A along with a matrix that identifies the response to each of the comments above, including the basis of the emission estimate.</p>
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11b	The table on page 6 of 7, which documents the representative construction equipment, capacity (hp), equipment count, operating schedule, and estimated emissions (tons per year [tpy]), needs to be updated to address or clarify the following:	Resource Report 9 Attachment A	Tennessee has revised the calculations that estimate emissions from construction of the compressor stations to respond to the comments above. The revised calculations are provided in Attachment A along with a matrix that identifies the response to each of the comments above, including the basis of the emission estimate.
11b	<ul style="list-style-type: none"> i. Updates to reflect any changes to the table on page 2 of 7 to address the items identified in a) above. ii. Include a column documenting the estimated HAP emissions that follows the methodology stated in footnote 6. iii. Verify water truck equipment count, operating hours, and days used. iv. Equipment capacity needs to include appropriate load factor adjustments similar to the non-road construction equipment emissions estimates presented in Attachment B. v. Footnote 5 is not associated with specific equipment in the table. 	Resource Report 9 Attachment A	
11c	The table on page 1 of 7, which includes a summary of total construction emissions, needs to be updated to reflect any changes to the tables on page 2 of 7 and page 6 of 7, as noted in a) and b) above.	Resource Report 9 Attachment A	

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12a	Attachment A: Emission Calculations – Construction of Compressor Stations. The following item was identified for Compressor Stations 315, 317, 319, 321, 323, and 325: The table on page 6 of 7, which includes emissions from construction equipment, needs to be corrected to properly reflect the Project span as noted on page 4 of 7 (assumption 3), including start date, end date, days used, and the emission values (tpy) which are based on this data.	Resource Report 9 Attachment A	See Response to Number 11
13a	Attachment B: Emission Calculations – Construction of Pipeline Loops. The following items were identified in each set of the pipeline loop construction calculations in: The table on page 5 of 7, which documents the representative equipment type, fuel type, capacity (hp), load factor, equipment count, hours of operation, criteria pollutant emission factors, total Project emissions, and EFR footnotes, needs to be updated to address or clarify the following:	Resource Report 9 Attachment B	Tennessee has revised the calculations that estimate emissions from construction of the pipeline loops to respond to the comments above. The revised calculations are provided in Attachment B along with a matrix that identifies the response to each of the comments above, including the basis of the emission estimate.

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13a	i. EFR 4 is not associated with specific equipment in the table. ii. The EFRs need to be updated to specifically identify the Table, Model Year, Tier Level, Transient Adjustment Factor, and Deterioration Factor used to develop the criteria pollutant emission factors for each equipment type. iii. Sulfur dioxide (SO ₂) emission factors need to be included for all diesel equipment using the Sulfur Adjustment for PM Emissions emission calculation methodology presented in EPA guidance document EPA420-P-04-009 referenced in EFR 1 and EFR 4. iv. Provide an explanation as to why the AP-42 Section 3.3 Stationary Source emission factors for the gasoline fired welding machines and generators are more appropriate than the emission factors that can be derived from the EPA guidance document titled “Exhaust Emission Factors for Nonroad Engine Modeling: Spark Ignition”, EPA420-R-05-019, December 2005.	Resource Report 9 Attachment B	Same Response as above
13b	The table on page 7 of 7, which documents emissions from mobile sources, needs to be updated to address or clarify the following:	Resource Report 9 Attachment B	Same Response as 13a

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13b	i) The start date, end date, and total days do not correspond to the project span as noted on page 3 of 7 (assumption 3). ii) The note below the table is incomplete.	Resource Report 9 Attachment B	Same Response as 13a
14	Attachment B: Emission Calculations – Construction of Pipeline Loops. Pipeline Loop 2: The table on page 1 of 7, which documents total Project emissions, needs to be updated to include SO ₂ , PM ₁₀ , and PM _{2.5} emissions from commuter vehicles and delivery vehicles, currently shown as zero for each.	Resource Report 9 Attachment B	See response to Comment No. 13.
15	Attachment B: Emission Calculations – Construction of Pipeline Loops. Pipeline Loop 6: The table on page 5 of 7, which documents the representative equipment type, fuel type, capacity (hp), load factor, equipment count, hours of operation, criteria pollutant emission factors, total Project emissions, and EFR footnotes, needs to be updated to include emission factors for dump trucks.	Resource Report 9 Attachment B	See response to Comment No. 13.
16	Attachment B: Emission Calculations – Construction of Pipeline Loops. All pipeline loops: The table on page 1 of 7, which includes a summary of total construction emissions, needs to be updated to reflect any changes to the tables on pages 2 through 7.	Resource Report 9 Attachment B	See response to Comment No. 13

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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RESOURCE REPORT 10			
1	In each table that compares the proposed Project facilities to alternatives, provide footnotes that identify the type and source of information (e.g., GIS data, aerial photographic interpretation, field survey) for each environmental factor in the tables (e.g., acres of operational impact on wetlands, number of residences within 50 feet of construction work areas).	Resource Report 10 Tables 10.2-1, 10.3-1, 10.3-2, 10.3-3, 10.4-1 and 10.4-2	An Information Sources column has been added to Tables 10.2-1, 10.3-1, 10.3-2, 10.3-3, 10.4-1 and 10.4-2 in Resource Report 10. Information sources used to quantify environmental factors include Alignment Sheets / Engineered Plans, GIS data, Aerial photography, Field Surveys, Consultation with applicable regulatory agencies and topographic mapping.
2	Clarify whether tables 10.2-1, 10.3-1, 10.3-2, and 10.3-3 provide the number of occupied structures within 500 feet of construction work areas as indicated, or within 50 feet of construction work areas as previously requested by the FERC staff. If necessary, revise the tables to provide the number of occupied structures within 50 feet of construction work areas.	Resource Report 10 Tables 10.2-1, 10.3-1 and 10.3-3	Tables 10.2-1, 10.3-1 and 10.3-3 have been edited to show the number of occupied structures within 50 feet of construction work areas.
3	Provide the approximate starting and ending mileposts along the proposed loop for each route alternative discussed in section 10.3 and label the corresponding figures with the mileposts.	Resource Report 10 Section 10.3 Tables	The tables in 10.3 include footnotes noting station start and end points for route alternatives.

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RESOURCE REPORT 10			
4	The FERC staff previously requested TGP to analyze loop alternatives to the proposed crossing of the Monksville Reservoir that would: 1) start at the proposed start of Loop 325, but terminate to the west of the Monksville Reservoir (thus shortening Loop 325); and 2) terminate at a point to the west of the Monksville Reservoir, but start at an approximately equal distance to the west of the proposed starting point (thus maintaining the proposed 17.1-mile-long length of the loop). Either provide the previously requested comparison to the proposed alignment or, if TGP believes these alternatives to be infeasible, provide a detailed explanation to support such a determination.	Resource Report 10 Section 10.3.1.1.2	<p>1) Shortening the loop will compromise the capacity required for the expansion because the increased volume is proportional to the added loop length.</p> <p>2) This is not a feasible option because the loop begins at a tie-in to an existing loop; i.e. the starting point is a fixed location.</p>
5a	In table 10.3-1: provide the crossing length of the proposed alignment and each alternative (including the two noted in the preceding question) for Long Pond Ironworks State Park; and	Resource Report 10 Table 10.3-1	Long Pond Ironworks State Park is the Monksville Reservoir, which is depicted in the table. Lengths are provided.
5b	clarify the number of landowners affected by the proposed route (the text states 1 and the table indicates 7).	Resource Report 10 Section 10.3.1.1.1 Table 10.3-1	<p><u>Landowners Affected</u> The initial proposed route across the Reservoir involved 1 landowner (State of New Jersey).</p>

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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6	The FERC staff previously requested TGP to analyze a loop alternative to the proposed crossing of the WRNWR that would avoid the refuge by shortening Loop 325 (i.e., starting the loop at a point to the east of the refuge). Either provide the previously requested comparison to the proposed alignment or, if TGP believes that this alternative would not meet the Project objectives or would be otherwise infeasible, provide a detailed explanation to support such a determination.	Resource Report 10 Section 10.3.1.1.2	Starting the loop to the east of the Refuge without adding to the end of the proposed route was not considered feasible as shortening the loop will compromise the capacity required for the expansion because the increased volume is proportional to the added loop length.
7	Include a detailed alternative analysis that includes routes around the land owned by the U.S. Army Corps of Engineers in Pennsylvania on Loop 321. TGP should use tables to compare any alternatives to the proposed route and include maps that show any alternatives.	Resource Report 10 Section 10.3.1.1.1	A northern reroute of Stillwater Reservoir would put the pipeline in the town of Union Dale, a populated area, and add about 1 mile to the route. A southern reroute would require traversing south of the dam and add about 2.5 miles to the route. Regardless of which alternative, all options would require the crossing of the Lackawanna River. In comparison, the proposed route is approximately 0.3 miles, which minimizes disturbance to the environmental and surrounding landowners.

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8a	In table 10.3-2: as previously requested by FERC staff, provide the value for each environmental criterion for each alternative and the corresponding segment of the proposed route for their entire lengths as well as for only that portion of each alternative and the corresponding segment of the proposed route within the WRNWR. For example, the South Route Alternative is 7.64 miles long, none (zero miles) of which would cross the WRNWR; whereas the corresponding segment of the proposed route appears to be approximately 2.8 miles long, of which approximately 0.77 mile is within the WRNWR;		FERC is comparing values in the Monksville table to values in the Walkkill River table. No action taken.
8b	“N/A” appears to be used to represent “Not Applicable” and “Not Available” in the table. Clarify the use of “N/A” in the table and provide the relevant information if it is available (e.g., would not the operational impact on wetlands associated with the HDD alternative be “0 acres?”); and	Table 10.3-2	The use of Not Applicable and/or Not Available has been made clear in the updated Tables. Operational impacts from HDD zero.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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8c	the corresponding length of the proposed route that would be avoided by either the Northern Route, Southern Route, or HDD alternatives is compared to the proposed 2.15 miles. However, figure 10.3-1 indicates that the Northern Route and Southern Route alternatives terminate at different locations along the proposed route (i.e., the comparative length of the proposed route differs for each alternative). Revise table 10.3-2 to accurately reflect the corresponding length of the proposed alignment (and all associated impacts) for each alternative or include the portion of the proposed route into each alternative so each route has the same endpoint.		Same as above comment - Table 10.3-2 is for the Monksville Reservoir. Table 10.3-3 is for the Wallkill River. No action taken on this comment.
9	Provide a drawing depicting the 2 Mile End of Loop alternative for the WRNWR at an approximate scale of 1:12,000 on a USGS topographic map.	Figure 10.3-3a in Attachment A of Resource Report 10	This figure has been added to the Final Environmental Report and is called the “Eastern Alternative”
10	10. Table 10.3-2 indicates that a disadvantage of the 2 Mile End of Loop alternative is that it could affect pipeline hydraulics allowing less throughput. Explain the effect that the alternative would have on pipeline hydraulics, and specifically address whether adoption of the 2 Mile End of Loop alternative would prevent TGP from meeting its contractual agreement with Equitable. Also explain the feasibility of adding additional compression in place of the 2 Mile End of Loop alternative.	Resource Report 10 Section 10.3.1.1.3	The “Eastern Loop Alternative” is discussed in Section 10.3.1.1.3.

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Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
11	Figure 10.3-2 depicts three alternative routes to the proposed crossing of the New Jersey Highlands area; however, only one alternative was analyzed in table 10.3-3. Provide a comparative analysis of all three alternatives considered to avoid or minimize impact on the Highlands area. In addition to the criteria already included in table 10.3-3, include the approximate mileage and percentage that the proposed route and each alternative would be collocated (within or adjacent to) existing right-of-way and the length that each alternative and the proposed route cross land within the Highlands Planning Area and Highlands Preservation Area. Revise figure 10.3.-2 to demark the Highlands Planning Area and note that the corresponding length of the proposed alignment varies among the three alternatives shown on figure 10.3-2.	Resource Report 10 Section 10.3.1.1.4	Alternatives to crossing the Highlands area have been updated and are discussed in Section 10.3.1.1.4
12	Explain the route selection for each Highlands alternative, including why each alternative starts to the west of MP 0.0 of proposed Loop 325 rather than at MP 0.0 and why each alternative rejoins the existing 300 Line within the Highlands area, rather than avoiding this area entirely.	Resource Report 10 Section 10.3.1.1.4	Alternatives to crossing the Highlands area have been updated and are discussed in Section 10.3.1.1.4

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
13a	Provide a comparison of the environmental, technical, and economic characteristics of the following route variations identified in response to public comments received for the Project. Milliken Route Variation – As described in a comment letter from John and Andrew Milliken dated February 14, 2009, this variation would potentially avoid and/or minimize impact on residential properties by relocating the Project alignment to the south of the existing 300 Line pipeline.	Resource Report 10 Section 10.3.1.2.4	This variation is not considered in the proposed alignment. The infrastructure at this compressor station requires that the proposed pipeline be sited on the north side of the existing line. Additionally, there are no proposed crossovers planned for Loop 323, as this loop will terminate on the north side of the existing line. In general, crossovers are avoided to minimize land and environmental impacts and facilitate a safer and more efficient installation.”
13b	Wolf Route Variation – As described in a comment letter from Abraham Wolf dated March 20, 2009, this variation would be located in a cultivated field south of the existing pipeline’s alignment to avoid additional clearing of mature trees on the Wolf property.	Resource Report 10 Section 10.3.1.2.3	This variation is not considered in the proposed alignment. The proposed route follows the existing ROW to minimize greenfield impacts, compared to deviating around the property owner.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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RESOURCE REPORT 10			
13c	For each of these route variations, provide a comparative table that presents the characteristics and environmental factors of the proposed and alternative alignments. Include as many of the factors listed in table 10.3-1 of FERC’s Guidance Manual for Environmental Report Preparation as can be calculated reasonably or obtained from existing published sources and databases or agency consultations. Summarize your analysis by providing a comparison of the environmental, technical, and economic characteristics of the routes. Provide mapping that shows both of these variations.	Resource Report 10 Section 10.3.1.2.4 Section 10.3.1.2.3	These variations are discussed in Sections 10.3.1.2.4 and 10.3.1.2.3
14	Section 10.4 indicates that presence of prime farmland soils was a factor considered in the evaluation of alternative sites for the two proposed new compressor stations; however, the comparisons presented for the alternatives for Compressor Stations 303 and 310 do not include an evaluation of impact on prime farmland soils. Revise tables 10.4-1 and 10.4-2 to include prime farmland soils as an evaluated environmental factor.	Resource Report 10 Table 10.4-1 Table 10.4-2	Impacts to Prime Farmland Soils and Farmland of Statewide Importance from the NRCS Web Soil Survey have been added to table 10.4-1 and 10.4-2 for both Compressor Stations and their alternative locations.
15	Figure 10.4-2 depicts an alternative location, but not the proposed location, for Compressor Station 310. Provide a revised figure 10.4-2 depicting the site boundaries for both the proposed and alternative locations for Compressor Station 310.	Resource Report 10 Attachment A Figure 10.4-2	Figure 10.4-2 has been revised to include both the preferred location and alternative location for CS 310

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
16	Comments received from APA Watch, Inc. identified three alternative sites for Compressor Station 310, located approximately 6, 9, and 14 miles southwest from the proposed location and along the existing 300 Line. Assess the engineering feasibility of these alternative sites. If potentially feasible, provide a comparative environmental analysis of the site(s) to the proposed location including the availability of these areas for purchase.	Resource Report 10 Section 10.4.2.1	The cost and environmental impact of building the additional pipeline looping make it unfeasible to relocate Station 310 to any of the alternate locations.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 11			
1	Identify by milepost and in table form all U.S. Department of Transportation (DOT) class locations and High Consequence Areas (as defined in Title 49 CFR Part 192.903 [49 CFR 192.903]) for the proposed pipeline routes.	Resource Report 11 Table 11.2-1 Table 11.2-2	See Tables 11.2-1 and 11.2-2.
2	Indicate whether the planned pipeline and aboveground facilities associated with the project would be designed, constructed, operated, and maintained to meet the requirements of DOT Minimum Federal Safety Standards in 49 CFR 192.	Resource Report 11 Section 11.2	The proposed Project facilities will be designed, constructed, operated, and maintained in accordance with the DOT federal safety standards, 49 CFR Part 192.
3	Indicate any reliability or safety measures being undertaken by TGP that are in addition to the DOT Minimum Federal Safety Standards found in 49 CFR Part 192.	Resource Report 11 Section 11.1	Measures implemented by Tennessee for its existing pipeline system, that will also be implemented for the Project facilities, in addition to the DOT’s federal safety standards in 49 CFR Part 92, include increased aerial patrols over Tennessee’s pipelines, and have additional foot patrols in certain areas. Other area-specific, case-by-case measures include increased frequency of leak surveys, addition of external impact protection, increased number of markers, increased depth of cover, increased wall thickness of the pipe, more local emergency response drills, tracking damage in a database, and active involvement in one-call organizations.

RESPONSE TO FERC COMMENTS ON DRAFT ER FILING			
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RESOURCE REPORT 11			
4	Describe the procedures TGP would implement in the event of emergency shutdowns and alarms for the planned pipeline facilities, including the availability of TGP personnel. Identify how the planned pipeline facilities would be remotely monitored and controlled.	Resource Report 11 Section 11.2.5	In the event of emergency shutdowns and alarms for the planned pipeline facilities, emergency procedures currently contained in the El Paso Pipeline Group Emergency Operating Procedures Manual would be utilized
5	Provide a description of TGP’s public awareness program and emergency response plan.	Resource Report 11 Section 11.2.8	<p>Tennessee Gas Pipeline educates the public on use of a one-call notification system prior to excavation and other damage prevention activities, possible hazards associated with unintended releases from a pipeline facility, physical indications that such a release may have occurred, steps that should be taken for public safety in the event of a pipeline release, and procedures to report such an event.</p> <p>The emergency procedures currently contained in the El Paso Pipeline Group Emergency Operating Procedures Manual (EOP) will be implemented</p>