



**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

VOLUME IIA – APPENDIX A

**FERC DATA REQUEST RESPONSE
TRACKING TABLE**

MARCH 2009

RESPONSE TO FERC COMMENTS ON INITIAL DRAFT RESOURCE REPORTS 1 AND 10			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 1			
1	Clarify the convention used to describe the milepost ranges of the proposed pipeline loops in table 1.1-1 or, alternatively, consider removing the “Milepost” column unless other information to be filed by Tennessee Gas Pipeline Company (“TGP”) would refer to the mileposts.	RR1 Table 1.1-1	Milepost ranges removed.
2	In table 1.1-1, Compressor Station 321 is considered modified. In table 1.1-3, it appears that there would be 4,100 horsepower newly installed. Clarify the definition of new versus modified in this table and throughout the resource reports.	RR1 Table 1.1-1 footnote a.	“New” refers to pipeline infrastructure facilities not currently existing that require new land development; “Modified” refers to existing pipeline infrastructure facilities proposed for modification that do not require new land development.
3	Explain the nomenclature used to describe the existing pipeline system (e.g., 300-1 Line, 300 Line) and use consistent nomenclature throughout all of the Resource Reports.	RR 1 Section 1.0	Consistent nomenclature will be used to identify Tennessee’s existing 24-inch diameter 300 Line pipeline relative to the proposed 30-inch diameter loop pipeline segments given numeric designations of 313, 315, 317, 319, 321, 323 & 325.
4	Specify the normal and maximum allowable operating pressures of both the existing 300 Line system and the proposed facilities.	RR1 Section 1.1.2.1	<u>The existing 300 Line MAOP (Normal) pressure (psig):</u> From Station 219 Discharge to MLV 303: 877 (790) MLV 303 to MLV 311: 858 (770) MLV 311 to Station 313: 844 (700) Station 313 to MLV 329: 1,170 (900-1,000) The MAOP of the proposed loop pipeline facilities will be 1,170 psig. Any new or modified aboveground facility MAOP will be consistent with the MAOP at the particular location of Tennessee’s system noted above.
5	Provide the following clarifications or additional information related to section 1.1.1, Purpose and Need:		

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RESOURCE REPORT 1			
5a	Clarify the number of existing compressor stations at which TGP proposes either expansion or upgrade activities;	RR1 Section 1.1.1	As part of the existing compressor station expansions, Stations 313, 315, and 325 will have additional horsepower installed, Stations 319 and 321 compressors will be restaged, Station 317 compressor will be replaced with an upgraded unit, and the compressor at Station 323 will have a filter separator added. As part of the general system upgrade to capture synergies, Stations 313, 315, 321 and 325 will have horsepower replaced by installation of newer, larger units installed as part of the expansion and by the retirement of older units.
5b	Further describe the relationship of the interconnect located in White Plains, New York to the proposed project;	RR1 Section 1.1.1	The White Plains delivery point is an existing interconnect with Consolidated Edison and is one of the delivery points selected by Equitable in the Precedent Agreement for this project. The Project design with the termination of the 325 Loop Segment, provides the capacity to deliver 50,000 Dth/d to the White Plains meter with no modification or new facilities required at White Plains.

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5c	Further explain how the proposed general system upgrades would improve overall system reliability;	RR1 Section 1.1.1	The proposed general system upgrade will improve the reliability of Tennessee’s system as a result of replacing older units that require more maintenance downtime with new units that require less maintenance and thus will be available to run at a higher percentage of time during the year. Additional pipeline looping will reduce the runtime of all the equipment on low flow days and extend the life of the units. The newer, more efficient units will typically be used preferentially on less than full load days, with older less efficient units throttled back or shut down. This reduces fuel consumption and the volume of gas transported for internal consumption is reduced making the system more reliable.
5d	Describe and quantify in section 1.1.1 the “constrained pipeline capacity situation in the northeast” referenced in section 10.1 of Initial Draft Resource Report 10 and relate the project objectives stated in section 10.1.2.9 of Initial Draft Resource Report 10 to the project purpose and need; and	RR1 Section 1.1.1	All four interstate pipelines, including Tennessee, providing capacity from PA to the Northeast market are currently fully subscribed during the winter months. Pricing signals confirm that capacity is constrained for moving gas into Northeast markets on cold winter days. Forecasts project gas imports from Canada into the Northeast U.S. will decline by 1 to 2 Bcf/d by 2015, therefore Northeast gas demand will increasingly need to be met by gas flowing from the west and south further constraining the existing pipeline systems. These factors combined with projected growth from Marcellus Shale formations, volumes from Rockies Express, and the geologically inherent lack of underground storage in the northeast region, combine to create a constrained pipeline capacity for transporting natural gas during periods of high-demand.

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RESOURCE REPORT 1			
5e	Clarify the apparent discrepancy in incremental natural gas delivery capacity that would result from the proposed project. It is stated in section 1.1.1 that the proposed project would increase natural gas delivery capacity in the northeast United States by approximately 300,000 dekatherms per day (“dth/d”). However, section 10.2.1 of Initial Draft Resource Report 10 indicates that 120,000 of the 300,000 dth/d would be obtained from the termination of currently effective transportation service agreements, suggesting that the proposed project would actually increase natural gas delivery capacity by 180,000 dth/d.	RR10 Section 10.2.1	The 120,000 Dth/d of existing capacity that becomes available from expiring service agreements is in the contract path, but does not extend all the way to the delivery points selected by Equitable in the Precedent Agreement. Although the use of existing expiring capacity reduces the total facilities required to provide the proposed service, additional expansion of Tennessee’s system points is required to enable deliveries to the downstream points. The 300,000 Dth/d of incremental capacity is incremental to the market area in which deliveries are proposed in New Jersey and New York.
6	Describe the proposed modifications to the existing meter station referenced in section 1.1.2.2, and provide the location of the meter station.	RR1 Section 1.1.2.2	The meter station modifications are a non-reporting (255A) activity and is not longer included within the scope of the Project.
7	Include in table 1.1-3 a column listing the existing horsepower at each compressor station included in the project, and a column listing the total horsepower that would result at each compressor station if the project is approved and constructed.	RR1 Table 1.1-3	A column clarifying existing, proposed, and total horsepower for each compressor station facility has been added to table 1.1-3.

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RESOURCE REPORT 1			
8	In section 1.1.2.2.1, explain how the proposed replacement of selected gas engines and turbine drivers would reduce environmental impact as compared to the existing equipment.	RR1 Section 1.1.2.2.1	The replacement of selected gas engines(s) and turbine drivers will reduce environmental impacts by limiting additional land development through increasing horsepower needed for the additional system capacity by replacing existing horsepower with larger horsepower within the same building. This eliminates the need for installing an additional building to house additional compression, thereby minimizing the amount of ground disturbance within our property. Additionally, combustion and emission reduction technology, particularly NOx reduction, has advanced significantly in the past 20 or 30 years, when some of the existing units that Tennessee is proposing to replace were installed. Where Tennessee is proposing the replacement of existing engine and turbine drivers, the new units will be equipped with the latest combustion and emission technology and an overall reduction in emission rates will result.

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9	Confirm what utilities currently extend to the proposed new compressor station sites (e.g., electric, sanitary sewer, water, communication) and describe any new utility construction or modifications to existing utilities that would be necessary to serve the new compressor stations, including whether any new construction or modifications would result in impacts outside of existing utility rights-of-way (this discussion should be presented in Section 1.7, Non-jurisdictional Facilities).	RR1 Section 1.1.2.2.1	New compressor station facilities will be connected to existing electric and communication public utilities available in the vicinity of the Project sites. Additional utilities include installation of a self-contained on-site water well and sanitary sewer system. New utility right-of-way will be required for Compressor Station 310. Compressor Station 313 will require a new 115kV power transmission line constructed within new utility right-of-way approximately 0.5 miles long to serve the new 6,500 horsepower electric motor driven compressor to be installed. Minor construction will be required to the existing electric power utility service into Stations 315, 319, 321 & 325 for the proposed modifications. No new rights-of-way are required. No utility construction work is required for Stations 317 & 323.
10	Confirm whether the proposed pipeline facilities would include any blow-down valves. If so, describe the facilities and include them in pertinent tables and text throughout the Resource Reports. Note that noise associated with blow-down events would need to be addressed in Resource Report 9.	RR1 Section 1.1.2.2.2 & 1.1.2.2.3; RR9 Section 9.2.10	A blow-down valve is incorporated in the design of each MLV assembly and Pig Launcher and Receiver facilities. Each blow-down valve will be equipped with a silencer. In the event that a segment of the proposed pipeline requires a blow-down (emergency, maintenance activity, or pipeline expansion) a blow-down silencer may be used to meet the requirements of DOT CFR 192 noise regulations. Pipeline blow-down events are typically short in duration, and noise levels and duration are variable depending on the volume and pressure of gas being released.

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RESOURCE REPORT 1			
11	<p>In table 1.2-10, clarify whether the acreage of land affected during construction and operation of the proposed appurtenant aboveground facilities is included within the impacts associated with each pipeline loop (tables 1.2-2 through 1.2-8). In general, avoid duplicating (i.e., double counting) impacts for proposed facilities that may be collocated with each other (e.g., a pipeline loop and an aboveground facility) in all tables and text throughout all Resource Reports. Also, in table 1.2-9, are the acreages listed for the existing compressor station new land that would need to be acquired?</p>	<p>RR1 Section 1.2.2, Tables 1.2-9 & 1.2-10</p>	<p>The acreage of land for the appurtenant aboveground facilities detailed in Table 1.2-10 is included within the impacts associated with each pipeline loop within Tables 1.2-2 through 1.2-8. These acreages are not “double counted” in the summary land requirements table (Table 1.2-1) and Tennessee has included this table solely as a reference to provide detail on the size of the appurtenant aboveground facilities associated with the pipeline loops and that will be maintained during operation of the facilities.</p> <p>The land identified for construction and operation of the existing compressor station modifications in Table 1.2-9 is land currently owned by Tennessee. No new land acquisition will be required for the existing compressor stations.</p>
12	<p>Describe any proposed modifications or alternative measures to the Federal Energy Regulatory Commission’s (“FERC”) Upland Erosion Control, Revegetation, and Maintenance Plan (“Plan”) and Wetland and Waterbody Construction and Mitigation Procedures (“Procedures”) in Resource Report 1, rather than Resource Report 8, and describe how each proposed modification or alternative measure would provide equal or greater environmental protection. Throughout the Resource Reports, TGP should refer to the project-specific construction, restoration, and mitigation plans as its own, rather than as the FERC’s Plans and Procedures.</p>	<p>RR1 Section 1.3.1.9.9; Section 9.0 of the 300 Line Project ECP in Volume II-A – Appendix D</p>	<p>Project specific deviations from the FERC’s Plan and Procedures are detailed in Section 1.3.1.9.9 of Resource Report 1, as well as Section 9.0 of 300 Line Project Environmental Construction Plan included in Appendix D of Volume II-A of the ER.</p>

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13	In accordance with 18 CFR Section 380.15, indicate how TGP would dispose of trees cleared from the ROW in areas of public view. Also indicate how TGP would ensure that any stacks of timber along the ROW (even in areas of non-public view) are accessible to the landowner or properly removed if they would be inaccessible after restoration. If timber stacks are to be used as wildlife habitat, consult with the appropriate Pennsylvania and New Jersey Agencies to determine the appropriate size and spacing and clarify if landowner or land managing agency approval would be obtained.	RR1 Section 1.3.1.2; Sectoin 4.1.1 of the 300 Line Project ECP in Volume II-A – Appendix D	In all cases where trees and vegetation are removed from the ROW within areas of public view, Tennessee and/or the construction contractor will dispose of cut timber and brush without undue delay. Tennessee will stockpile all useable timber in pre-determined locations as agreed to by the landowner. It will be the responsibility of the CI to ensure that these agreements are upheld. Tennessee is not proposing to leave timber stacks on the ROW as wildlife habitat features.
14	Include a description of any additional visual screening to be utilized at any compressor stations. A short description of any additional visual screening methods to be implemented for Compressor Stations 303 and 310 should be included in Resource Report 1 with a more detailed description reported in Resource Report 8 along with site-specific plans.	RR1 Section 1.1.2.2.1	The site for Compressor station 303 has several hundred feet of frontage on Meadow Church Road, however the facility will be set back from the road far enough so that the grade of the terrain provides adequate visual screening for the facility from the road. Additionally, Tennessee will plant trees along the road frontage for added visual screening. The site for Compressor Station 310 is located over 1 mile off the public road in a heavily wooded area, so no additional visual screening will be required. No additional visual screening is planned for the existing compressor station sites.

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RESOURCE REPORT 1			
15	In section 1.3.1.9.1, confirm whether restoration would begin immediately after pipeline installation in areas of rugged topography to minimize potential erosion, and confirm that these areas would be identified by milepost in Resource Report 6.	RR1 Section 1.3.1.9.1; Table 1.3-1; RR6 Table 6.4-1	In areas of rugged topography, ROW restoration will begin within 10 days of final pipeline installation to minimize potential erosion and sedimentation control problems. Table 1.3-1 identifies areas of steep slopes (>28% slopes) encountered along the Project Loops. Table 6.4-1 identifies areas along the Loops by MP where soils with severe erosion potential exist, including soils with steep slopes.
16	Provide a more detailed description of the construction methods that TGP would implement in residential areas, including but not limited to trenching, pipe assembly, and pipe installation techniques; landowner notification; typical timing; traffic control; efforts to preserve existing landscaping and fencing; methods to provide access during construction; and safety and security. Confirm that TGP would implement a Landowner Complaint Resolution Procedure to address issues that may arise during and after construction. Provide a schedule for when TGP would provide the Landowner Complaint Resolution Procedure and the site-specific construction plans for residences within 25 feet of the construction work areas.	RR1 Section 1.3.1.9.2 & Section 1.8; Section 5.6 of the 300 Line Project ECP in Volume II-A – Appendix D	<p>Detailed descriptions of the construction methods to be employed in residential areas are provided in Section 5.6 of 300 Line Project ECP included in Appendix D of Volume II-A of the ER. Tennessee is also developing site-specific construction plans for residences within 25 feet of the construction work areas as well as a Landowner Complaint Resolution Procedure for construction related landowner complaints. The Landowner Complaint Resolution Procedure will be filed with the FERC by June 30, 2009.</p> <p>In addition to 14 published notices in local area newspapers, Tennessee mailed out 1,063 open house invitations to affected landowners and stakeholder groups in the Project areas.</p>

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RESOURCE REPORT 1			
17	Confirm that TGP would develop site-specific plans for each of the proposed horizontal directional drills (“HDDs”) and that these plans would identify HDD failure criteria and include contingency plans in the event of a frac-out of HDD failure. Provide a schedule for when the site-specific HDD plans would be provided. TGP should also provide the appropriate noise surveys for the proposed HDDs in Resource Report 9.	RR1 Section 1.3.1.9.5; RR9 Section 9.2.11; Volume II-A – Appendix G; Volume II-B – Appendix N	<p>Tennessee has developed a HDD Contingency Plan for the Project that establishes procedures for addressing potential impacts associated with a release of drilling fluid through hydraulically induced fractures during the HDD process. In addition, this document establishes the criteria by which Tennessee and the appropriate regulatory agencies would determine when a proposed HDD is unsuccessful and must be abandoned in favor of the approved alternate crossing method.</p> <p>Site-specific plans for each proposed HDD have been developed by Tennessee and are included as an appendix in the ER.</p> <p>Appropriate noise surveys for the proposed drilling activities have been included in Resource Report 9.</p>
18	Confirm that TGP would develop a project-specific Blasting Plan that would detail, among other things, landowner notification; safety and security, including blasting in proximity to TGP’s existing pipeline facilities or other utilities; qualifications of blasting personnel; blasting techniques; fly rock control; and pre- and post-blast monitoring. Provide a schedule for when the Blasting Plan would be provided.	Volume II-A – Appendix I	<p>Tennessee has developed a Blasting Plan that establishes procedures and safety measures that the Contractor will adhere to while implementing blasting activities along the pipeline right-of-way during the Project. The Contractor will be required to submit a detailed Blasting Specification Plan to Tennessee Gas Pipeline that is consistent with the provisions of the Blasting Plan and El Paso Construction Specification for Land Pipeline Construction LP-6. The Contractor's plan, when approved by Tennessee, will be incorporated into the Contractor's scope of work.</p>

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RESOURCE REPORT 1			
19	Expand section 1.3.1.9.7 to include a description of the methods TGP would utilize to construct in wetlands and include drawings depicting these methods in Resource Report 2.	RR1 Section 1.3.1.9.7; RR2 Section 2.3.3; Section 5.12.2 and Figures WW2 and WW3 of the 300 Line Project ECP in Volume II-A – Appendix D	Section 1.3.1.9.7 has been expanded to include detailed wetland crossing techniques. These techniques are also detailed in Section 2.3.3 of Resource Report 2, and in Section 5.12.2 of the 300 Line Project ECP included in Appendix D of Volume II-A of the ER.
20	Describe the waterbody crossing methods that TGP would utilize and how they would comply with state or local regulations governing waterbody crossings. If any waterbody crossings would take place outside the timeframes mentioned in the FERC's Procedures, provide agency concurrence for these proposed crossing timeframes. Also, address in-stream blasting, if necessary. Include drawings depicting these methods in Resource Report 2.	RR1 Section 1.3.1.9.8; RR2 Section 2.2.9; Section 5.13 and Figures SB1, SB2, EC1, EC2, EC3, EC4, WC1, WC2, WW1, WW2, WW3, WW4, WW5, and STC of the 300 Line Project ECP in Volume II-A – Appendix D.	Section 1.3.1.9.8 of Resource Report 1 includes information on waterbody crossing methods and construction techniques. These techniques are also detailed in Section 2.2.9 of Resource Report 2, and in Section 5.13 of the 300 Line Project ECP included in Appendix D of Volume II-A of the ER.
21	In section 1.4.1.1, provide further description of the state in which the permanent pipeline right-of-way would be maintained (e.g., herbaceous vegetation, brush, trees) and the frequency with which vegetative maintenance would be conducted	RR1 Section 1.4.1.1	Tennessee will conduct vegetation maintenance on their permanent easement within uplands once every five to seven years through maintenance mowing. This maintenance schedule will allow vegetation on the ROW to be maintained in herbaceous to low scrub-shrub cover state facilitating inspection and emergency access.
22	In section 1.4.1.3, provide the frequency by which periodic air and ground patrols of the pipeline facilities would be conducted.	RR1 Section 1.4.1.3	Aerial patrols are conducted one to two times per month with ground surveys conducted on an annual basis. Additional ground surveys are conducted on an as needed basis to respond to issues such as landowner concerns and third-party encroachments.

RESPONSE TO FERC COMMENTS ON INITIAL DRAFT RESOURCE REPORTS 1 AND 10

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RESOURCE REPORT 1			
23	<p>Section 1.5, Future Plans and Abandonments, discusses the potential for extending the proposed 300 Line loop segments and adding horsepower at existing compressor stations in the future pending the results of a non-binding open season that is currently in progress, and indicates that such a project could be in-service as early as November 2012. Provide the closing date for the non-binding open season and indicate when TGP anticipates a decision regarding the viability of completing the looping of the 300 Line. Further, provide an estimated date that TGP would file an application for a Certificate of Public Convenience and Necessity assuming TGP’s planned November 2012 in-service date for the potential project.</p>	RR1 Section 1.5	<p>Tennessee conducted a non-binding open season for its Northeast Supply Diversification Project (NSD Project) from November 4th to December 4th, 2008 to help determine the need for additional gas pipeline capacity to transport gas from multiple existing and proposed new receipt points along Tennessee’s system to existing and proposed new delivery points across Tennessee’s market area in upstate New York and New England, as well as Connecticut and New York City markets via the Iroquois Gas Transmission system. Interest in this conceptual project from the market was significant; however, Tennessee has not yet had the opportunity to meet with most of the participants to more fully explore the extent and seriousness of the interest. It is anticipated that these discussions will take place in the first half of 2009 at which point Tennessee will be in a better position to evaluate the viability of such a project. Recognizing changes that have occurred in the markets since that open season, particularly in the pricing for natural gas, availability of credit to support drilling and construction activity, it is not possible to say what the outcome of those discussions will be. There could be changes to the scope or timing of the project that develop during those discussions. Should there be interest in the project for a November 2012 in service date, it is reasonable to assume that an application for a Certificate of Public convenience and Necessity would be filed during the second half of 2010, depending on scope.</p>

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RESOURCE REPORT 1			
24	Include in table 1.6-1 any permits, consultations, and/or approvals associated with crossing the Wallkill National Wildlife Refuge in New Jersey and also for the Susquehanna River Basin Commission (or any other water managing agency) for withdrawing hydrostatic test water from the Susquehanna River or other waterbodies, if proposed. Also include in table 1.6-1 any permitting or approval requirements that may apply to crossing former surface mines.	RR1 Table 1.6-1	Installation of Loop 325 within the Wallkill River National Wildlife Refuge will require a “Finding of Appropriateness” decision as well as a “Compatibility Determination” by refuge managers. The Susquehanna River Basin Commission and the Delaware River Basin Commission regulate water use and withdrawal from surface and groundwaters within the respective river basin watersheds. Both Commissions review and issue permits for any surface water withdrawal in excess of 100,000 gallons-per-day.

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RESOURCE REPORT 1			
25	Describe the existing 300 Line system, including the starting and ending locations of the system, length and diameter of existing pipelines, number of compressor stations, and natural gas capacity.	RR1 Section 1.0, Table 1.0-1	<p>Tennessee’s existing pipeline infrastructure consists of approximately 13,400 miles of pipeline designated as the 100, 200, 300, 500, and 800 Lines based on the region they serve. The proposed Project focuses on the existing 300 Line, which consists of a 24-inch diameter pipeline which starts at the discharge of Compressor Station 219 in Mercer County, Pennsylvania, travels east through Pennsylvania, New Jersey, New York, Connecticut and ends at the discharge of Compressor Station 261 in Hampden County, Massachusetts. The Project involves that section of the existing 300 Line from Compressor Station 219 in Mercer County, Pennsylvania, to Main Line Valve (“MLV”) 335 located in Westchester County, New York. There are eight existing compressor stations along the 300 Line from Compressor Station 219 to MLV 335. Table 1.0-1 details the capacity for each station.</p> <p>Portions of the existing 300 Line have been previously looped. The 132-mile length of the 24-inch 300 Line from Compressor Station 219 in Mercer County, Pennsylvania to Compressor Station 313 in Potter County, Pennsylvania, has been looped with a 30-inch diameter loop line. From Compressor Station 313 to Main Line Valve 335 located in Westchester County, New York, the 24-inch 300 Line has four distinct 30-inch diameter loops that total 33.2-miles. None of the loops proposed for this Project are located in an area with existing loop.</p>

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RESOURCE REPORT 1			
26	In section 1.1.1, TGP states that the proposed project would provide access to natural gas supplies from the Marcellus Shale area, and some Marcellus Shale producers who attended TGP’s open houses expressed interest in potentially connecting to the project. Provide further discussion regarding the potential for Marcellus Shale producers to connect to the proposed project.	RR1 Section 1.5	As an open access carrier, Tennessee’s Tariff provides for a process to allow shippers to interconnect with its pipeline system. Tennessee has had numerous requests from Marcellus Shale producers for interconnects and has been working with them. Some of these interconnects have already been completed while others are in process. During 2008, Tennessee processed approximately 14 requests and completed 7 taps by year end. This process is on-going and additional requests are anticipated. The requests for interconnects are being processed independent of the proposed system expansions. There were no Marcellus Shale producers that participated in the open season for the 300 Line Project. It may have been too early for them to know how much gas they had or where they wanted to sell it. Those producers connecting to Tennessee have the opportunity to use interruptible capacity, backhaul capacity, released capacity or to sell their gas to existing capacity holders. There were Marcellus Shale producers that participated in the Northeast Supply Diversification Project (“NSD”) Project non-binding open season concluded in December 2008 with an interest in firm capacity, but substantive discussions have not taken place yet to determine the seriousness of that interest.

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RESOURCE REPORT 1			
27	Proposed Loop 325 crosses the Wallkill River National Wildlife Refuge (“NWR”) between approximate mileposts (“MPs”) 1.0 to 1.8. Summarize the construction and restoration methods that TGP would implement to minimize impacts on the refuge in section 1.3.1.9 (Specialized Construction Procedures) and provide a more detailed description of these methods in Resource Report 8 (alternatively, TGP can include the detailed description of construction methods in Resource Report 1). Provide documentation of any discussions to date with representatives of the refuge and list any concerns presented.	RR1 Section 1.3.1.9.9	Standard pipeline construction methods will be utilized across the Wallkill River National Wildlife Refuge (NWR), including a dry waterbody crossing of the Wallkill River.

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RESOURCE REPORT 10			
28	In section 10.2, clarify whether any existing TGP facilities other than the 300 Line could potentially be expanded to meet the project objectives and, if so, provide a comparative environmental analysis of the alternative expansion facilities to the proposed project.	RR10 Section 10.2	Feasible system alternatives must be evaluated in terms of their ability to meet the project objectives, which are defined by the service contracted for by the market. The customer for the 300 Line Project, Equitable, has executed a Precedent Agreement that specifies three delivery points: Mahwah, Rivervale and White Plains, all of which are existing delivery points on the 300 Line. Equitable’s selected receipt point into the Tennessee system are in the Gulf Coast spread among each of the three Tennessee supply legs consisting of their 100 Line, 800 Line and 500 Line. Therefore, it is not possible to provide this service to Equitable at their specified delivery points without expansion of the 300 Line.
29	Provide the approximate length of the “Western Section” of the proposed project referenced in section 10.2.1 (Section 219 through Station 313).	RR10 Section 10.2.1	Existing pipeline for the Western Section is 132 miles of 24-inch and 30-inch diameter pipes in parallel.
30	Section 10.2.1 analyzes various alternatives for the Western Section of the proposed project, some of which would involve the installation of 36-inch- diameter pipeline loops. Explain whether 36-inch-diameter pipeline loops would be necessary to meet the project objectives rather than TGP’s practice of installing looping pipeline one standard size larger than the largest existing pipeline.	RR10 Section 10.2.1.1	Since the Western Section of the proposed project is completely looped with 24-inch and 30-inch diameter pipes, the next standard size larger pipe is 36-inch. Tennessee evaluated 36-inch-diameter pipe as an alternative. The 36-inch-diameter pipeline loop would meet the project objectives. The looping only option was not selected by Tennessee for this pipeline section due to the large amount of ROW acquisition, ground disturbance, and capital costs associated with the construction of 100.5 miles of incremental pipe looping that this option would have required.

RESPONSE TO FERC COMMENTS			
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RESOURCE REPORT 10			
31	Section 10.2.1 describes three Western Section system alternatives (Looping Only Option, Looping and Compression Option, and Additional Compression Only at Existing Compressor Stations). Provide a table comparing the three alternatives to the proposed project in this area (Additional Compression Only at Existing Compressor Stations and New Compressor Stations). Include in the table the following criteria:	RR 10 Section 10.2.1 / RR 10 Table 10.2.1	Table 10.2.1 compares the three alternatives to the proposed Project in the Western Section.
31a - j	<ul style="list-style-type: none"> a. length and diameter of new pipeline; b. land requirements for construction and operation; c. approximate acres of operational impacts on forested land; d. approximate acres of operational impacts on wetlands; e. approximate acres of operational impacts on threatened and endangered species habitat; f. approximate number of waterbody and major waterbody crossings; g. approximate number of affected landowners; h. approximate number of residences within 50 feet of construction work areas; i. a qualitative comparison of operational noise and air emissions ; and j. other information TGP used in evaluating the alternatives and proposed project. 	RR 10 Section 10.2.1 / RR 10 Table 10.2.1	Table 10.2.1 compares the three alternatives to the proposed Project in the Western Section.

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RESOURCE REPORT 10			
32	Provide the approximate length of the “Eastern Section” of the proposed project referenced in section 10.2.2 (Section 313 through White Plains, New York) and clarify why the Eastern Section extends to White Plains, when it appears that the project terminates at the eastern end of proposed Loop 325 in Passaic County, New Jersey.	RR10 Section 10.2.2	The existing pipeline length of the Eastern Section (Section 313 through White Plains, NY) is 245 miles of 24-inch-diameter pipeline with minimal 30-inch-diameter looping. White Plains is referenced only because it is the most downstream delivery point to be served by the proposed project specified in the Precedent Agreement with Equitable. The project design provides for 50,000 Dth/d of capacity to White Plains, however no additional looping or compression facilities are required downstream of the 325 looping section.
33	Provide the operational land impacts associated with both the Station 315 and Station 325 Alternatives discussed in section 10.2.2.1.	RR 10 Section 10.2.3.1	Operational land impacts associated with Stations 315 and 325 included in the Looping Only Option.
34	In section 10.2.2.3, further explain the process by which the beginning and ending points for each proposed loop were determined. Specifically, identify the information obtained from the helicopter fly-over of the right-of-way that contributed to selecting the beginning and end point locations.	RR10 Section 10.2.2.3	ROWs for the new pipeline loops were evaluated based on the mileages provided from Tennessee’s hydraulic model. The beginning and ending points returned by the hydraulic model were then evaluated by Tennessee’s Survey and Engineering departments during a helicopter fly-over of existing ROWs and computer software analysis of the area for any physical site-specific constraints that could not be incorporated into the hydraulic model designed for the Project but that could have a significant impact to Project feasibility.

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
35	<p>Proposed Loop 325 would involve an approximately 3,900-foot-long HDD to cross the Monksville Reservoir near the terminus of the loop in Passaic County, New Jersey. The last approximate 0.7-mile of the loop, including approximately one-half of the proposed HDD, occurs on the eastern side of the Monksville Reservoir and within Long Pond Ironworks State Park, which contains historically significant structures.</p> <p>Provide a discussion and table comparing alternatives to the proposed Monksville Reservoir/Long Pond Ironworks State Park crossing including, but not limited to: an alternative loop configuration that starts at the proposed starting point but terminates to the west of the Monksville Reservoir (thus shortening the loop); and an alternative loop configuration that terminates at a point to the west of the Monksville Reservoir but which starts 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).</p> <p>Include in the table the following criteria for each alternative and the corresponding segment of the proposed project:</p>	<p>RR 10 Section 10.3.1.1.1 / RR 10 Table 10.3-1</p>	<p>Alternatives to the proposed Monksville Reservoir/Long Pond Ironworks State parks have been provided in the text and in the table. Northern and Southern Route Alternatives are analyzed.</p>

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
35a - k	a. the length of new pipeline; b. land requirements for construction and operation; c. approximate acres of operational impacts on forested land; d. approximate acres of operational impacts on wetlands; e. approximate acres of operational impacts on threatened and endangered species habitat; f. approximate number of waterbody and major waterbody crossings; g. impacts on cultural resources; h. number and length of HDDs; i. approximate number of affected landowners; j. approximate number of residences within 50 feet of construction work areas; and k. other information TGP used in evaluating the alternatives and proposed project.	RR 10 Section 10.3.1.1.1 / RR 10 Table 10.3-1	Alternative pipeline length, land requirement, approximate acres of operations impacts on forested land, wetlands, threatened and endangered species habitat, approximate number of waterbody crossings, impacts on cultural resources, number and length of HDDs, approximate number of affected landowners, number of residences within 50 feet of construction work areas and other information Tennessee used to evaluate alternatives to the proposed project have been provided in Section 10.3.1.1.1 and in Table 10.3-1

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
36	Proposed Loop 325 crosses the Wallkill River National Wildlife Refuge NWR from approximate MPs 1.0 to 1.8. Provide a discussion of feasible alternatives and table comparing alternatives to the proposed Wallkill River NWR crossing including, but not limited to: a) shortening the loop; b) relocating the 17.1-mile-long length of loop to avoid the refuge; c) a route variation(s) that would start at the proposed starting point but which would avoid the refuge by routing around the refuge; and d) alternative construction methods (e.g., HDD) to reduce impacts to the refuge or limit construction to TGP’s existing ROW. Include in the table the following criteria for each feasible alternative and the corresponding segment of the proposed project:	RR 10 Section 10.3.1.1.2 / RR 10 Table 10.3-2	Alternatives to crossing the Wallkill River National Wildlife Refuge were analyzed and have been provided in Section 10.3.1.1.2 and in Table 10.3-2.

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
36 a - j	a. length of new pipeline; b. land requirements for construction and operation; c. approximate acres of operational impacts on forested land; d. approximate acres of operational impacts on wetlands; e. approximate acres of operational impacts on threatened and endangered species habitat; f. impacts on cultural resources; g. approximate number of waterbody and major waterbody crossings; h. approximate number of affected landowners; i. approximate number of residences within 50 feet of construction work areas; and j. other information TGP considered in evaluating the alternatives and proposed project. Provide each criterion for the entire alternative and corresponding segment of the proposed project and for only that portion of each alternative and corresponding segment of the proposed project within the Walkkill River NWR (i.e., provide the total impacts and only those impacts within the NWR).	RR 10 Table 10.3.2	Criteria taken into consideration when analyzing alternative to crossing the Walkkill River National Wildlife Refuge included length of new pipeline, land requirements, approximate acres of operational impacts on wetlands, forested land, threatened and endangered species habitat, cultural resources, approximate number of waterbody crossings, affected landowners, and number of residences.
37	Further explain the availability of land in proximity to the proposed new compressor stations and how those market conditions limited site selection	RR 10 Section 10.4	Land availability associated with the new compressor stations has been provided in RR 10 Section 10.4

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
38	TGP states that, in evaluating potential new compressor station sites, it searched a 4-mile-long corridor centered on existing mainline valves on the 300 Line. Further explain how hydraulic modeling was used to determine the approximate location of the proposed compressor stations.	RR10 Section 10.4	As a starting point, Tennessee will always look at midpoints between existing compressor station facilities for the optimum location of a new station. Tennessee will then use an approximately four-mile long corridor centered on the closest MLV to identify new compressor station properties. Tennessee will then evaluate the location of this 4-mile corridor in conjunction with the hydraulic modeling design for the Project that incorporates the optimum pipeline design and operating characteristics detailed in Section 10.2.2.3. If the corridor location works with the hydraulic model, then Tennessee will begin to evaluate locations within that corridor with respect to other considerations for construction, access, system interconnection, etc.
39	In section 10.4 it is stated that “several locations were identified to meet the requirements for siting of each new compressor station – the preferred site and up to two alternative sites for each compressor station.” However, only one alternative location for each compressor station is presented in section 10.4. Clarify the number of sites that were considered in siting the proposed compressor stations.	RR 10 Section 10.4.1.1 and 10.4.2.1	Alternative locations for the new compressor stations were analyzed.
40	Provide comparison tables containing the following criteria for each of the proposed compressor station locations and alternative locations considered:	RR 10 Tables 10.4.1 and 10.4.2	Tables 10.4.1 and 10.4.2 provide comparisons for the proposed new compressor station locations and alternative locations for the new compressor stations

RESPONSE TO FERC COMMENTS			
Number	Data Request	Response Location	Summary of Response
RESOURCE REPORT 10			
40a-1	a. total acres of site; b. length of access road(s); c. land requirements for construction and operation; d. approximate acres of operational impacts on forested land; e. approximate acres of operational impacts on wetlands; f. approximate acres of operational impacts on threatened and endangered species habitat; g. impacts on cultural resources; h. approximate number of affected landowners; i. approximate number of residences within 50 feet of construction work areas; j. approximate distance to the nearest noise sensitive area (“NSA”); k. constructability issues (e.g., grading); and l. other information TGP considered in evaluating the alternatives and proposed project.	RR 10 Tables 10.4.1 and 10.4.2	Tables 10.4.1 and 10.4.2 provide comparisons for the proposed new compressor station locations and alternative locations for the new compressor stations and include the suggested criteria.