

**ORIGINAL**

## United States Department of the Interior

**Bureau of Land Management-Eastern States  
 Northeastern States District  
 626 E. Wisconsin Avenue, Suite 200  
 Milwaukee, Wisconsin 53202-4617**



IN REPLY REFER TO:  
 2880(M03300)  
 WVES-058077/VAES-058078

October 6, 2015

Ms. Kimberly D. Bose  
 Federal Energy Regulatory Commission  
 888 First Street, NE, Room 1A  
 Washington, DC 20426

FILED  
 SECRETARY OF THE  
 COMMISSION  
 2015 OCT 13 A 9 54  
 FEDERAL ENERGY  
 REGULATORY COMMISSION

Re: Atlantic Coast Pipeline Project, Federal Energy Regulatory Commission  
 Docket Numbers PF15-5-000 and PF15-6-000

Dear Ms. Bose:

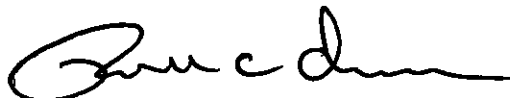
The Bureau of Land Management (BLM), Northeastern States District, notified the Federal Energy Regulatory Commission (FERC) and Atlantic Coast Pipeline, LLC (Atlantic) on August 13, 2015 that the application received on July 16, 2015 for the proposed Atlantic Coast Pipeline (ACP) Project was not complete and did not include a plan of development (POD) as required by Section 28 of the Mineral Leasing Act (MLA) of 1920, as amended, for that portion of the pipeline that would impact Federal lands. This letter serves as notification that Atlantic submitted a preliminary POD for the ACP Project on September 18, 2015, the same day the formal application for a Certificate of Public Convenience and Necessity was submitted to your office.

FERC authorized the pre-filing process for the ACP Project in November of 2014. This process allows FERC staff and Federal agencies to become involved with evaluating environmental issues before a formal application is filed. The planning process and the National Environmental Policy Act (NEPA) environmental process overlap to expedite project review by Federal agencies based on the expectation that agencies have adequate data to review early in the pre-filing process. The *Interagency Agreement on Early Coordination of Required Environmental and Historic Preservation Reviews Conducted in Conjunction with the Issuance of Authorizations to Construct and Operate Interstate Natural Gas Pipelines Certificated by the Federal Energy Regulatory Commission* commits Federal agencies to taking all appropriate actions to the extent consistent with applicable law to expedite energy related projects. The BLM provided FERC with notification on August 13, 2015 and September 3, 2015 that basic preliminary information for the Federal right-of-way (ROW) application had not been submitted for this project, and requested that steps be taken to ensure that information was submitted timely. Coordination to identify and address issues and concerns for the ACP Project has not

taken place in accordance with pre-filing procedures and preliminary information was not received until the formal application was submitted to FERC.

The BLM requests that FERC adjust the schedule to reflect the late submission of data and information by Atlantic, and extend adequate time for the Federal agencies to cooperate with Atlantic in identifying and developing comparative environmental resource data for the various alternatives identified through and around the National Forests in Atlantic's Resource Report 10. Further data regarding route alternatives and cumulative impacts of multiple regional pipeline projects is necessary before an environmental impact statement can be initiated under the compressed pre-filing process timeline. The BLM will work with the Federal agencies in the coming weeks to review Atlantic's preliminary application for a ROW and the Final Resource Reports that were submitted to FERC with the formal application.

Sincerely,

A handwritten signature in black ink, appearing to read "Randall C. Anderson". The signature is fluid and cursive, with a large initial "R" and "A".

Randall C. Anderson  
Acting District Manager

cc: Jennifer Adams  
Chris Lowie  
William Scarpinato, Jr.

Document Content(s)

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