

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 4
Dominion Transmission Inc.
Supply Header Project
Atlantic Coast Pipeline, LLC
Atlantic Coast Pipeline Project
Docket Nos. PF15-5-000
PF15-6-000

April 28, 2015

Matthew Bley
701 E. Carey Street,
Director, Gas Transmission Certificates
Richmond, VA 23219

Re: Staff's Comments on Preliminary Draft Resource Reports 1 and 10

Dear Mr. Bley:

The enclosure contains our comments on Atlantic Coast Pipeline, LLC's (Atlantic) and Dominion Transmission Inc.'s (DTI) preliminary draft Resource Reports 1 and 10 for the planned Supply Header Project (SHP) and Atlantic Coast Pipeline Project (ACP Project) submitted in December 2014. Unless otherwise indicated, our comments should be addressed in the next draft Resource Reports to be filed by Atlantic and DTI during the Pre-filing Process. To increase the efficiency of our review, the draft resource reports should include a matrix indicating where these comments are addressed and a schedule for submittal of any requested information that is not included in the draft resource reports. Additionally, please ensure that your Resource Reports discuss and address all substantive issues raised by commentors during the FERC scoping period. **Failure to adequately address the comments received may result in additional information requests by Commission staff.**

When filing documents and maps, prepare separate volumes as outlined on the Commission's website at <http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp>. Any plot plans showing equipment or piping details or other Critical Energy Infrastructure Information should be filed as non-public and labeled "**Contains Critical Energy Infrastructure Information – Do Not Release**" (18 Code of Federal Regulations 388.112). Cultural resources material containing location, character, or ownership information should be marked "**Contains Privileged Information – Do Not**

Release” and should be filed separately from the remaining information which should be marked **“Public.”**

Thank you for your cooperation. If you have any questions, please contact me at 202-502-6287.

Sincerely,

Kevin Bowman
Environmental Project Manager
Office of Energy Projects

Enclosure

cc: Public File, Docket Nos. PF15-5-000 and PF 15-6-000

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**Federal Energy Regulatory Commission
Comments on Preliminary Draft Resource Reports 1 and 10**

**Supply Header Project - Docket No. PF15-5-000
Atlantic Coast Pipeline Project - Docket No. PF15-6-000**

Preliminary Draft Resource Report 1 – General Project Description

1. Utilize a consistent metric (e.g., billion cubic feet per day (bcf/d), million standard cubic feet per day (mmscf/d), decatherms per day (dth/d), or million decatherms per day (mmdth/d)) to represent natural gas volumes for the Supply Header Project (SHP) and the Atlantic Coast Pipeline Project (ACP Project).
2. Identify the number of compressor units and current operational horsepower at the existing JB Tonkin, Crayne, and Mockingbird Hill Compressor Stations.
3. Identify the need of utilizing a 75-foot-wide permanent easement during operation of the AP-1 pipeline facility and whether a reduced permanent easement width could be utilized for the planned facility.
4. Describe how Dominion Transmission Inc. (DTI) and Atlantic Coast Pipeline, LLC (Atlantic) would determine the number and size of flume pipes to use if U.S. Geological Survey stream gauge data is not available.
5. Confirm that DTI and Atlantic would consult with and obtain permission from state regulatory agencies regarding the use of additives during the horizontal directional drill or bore construction processes, and that any additives used during these processes would not violate water quality standards.
6. Describe how DTI and Atlantic would mitigate a lateral movement of drilling fluid that affects source waters such as wells, seeps, and springs.
7. Provide a discussion regarding the advantages or disadvantages of routing the planned pipelines on ridgetops, laterally across steep terrain, and in valley floors.
8. Provide a typical cross-sectional diagram that illustrates the pipeline construction right-of-way in steep, lateral side slope conditions.
9. Include a discussion (in Resource Reports 1 and 6, as appropriate) regarding landslide potential along the planned pipeline routes and the impacts a small, moderate, or severe landslide could have on the planned pipelines. If applicable, identify the measures that would be implemented to prevent or minimize landslide issues during construction and operation of the facilities.

10. Address the following in either Resource Reports 1 and 6, as appropriate, regarding pipeline construction in karst settings:
 - a. Include a discussion regarding the impacts pipeline construction would have in a karstic setting, specifically in regards to triggering sinkholes or affecting groundwater, springs, seeps, or cave systems.
 - b. Identify the measures that would be implemented to prevent, minimize, or mitigate impacts on groundwater, springs, seeps, or cave systems during construction and operation of the facilities.
 - c. Identify how DTI and Atlantic would identify new or expanding sinkholes during operation of the planned facilities.
11. Describe the agricultural activities that would be permitted across the permanent easement after restoration is complete.
12. Describe how merchantable timber would be evaluated prior to removal and what timber activities would be allowed within the temporary and permanent right-of-way after restoration is complete (e.g., heavy equipment across the pipeline easement, timber production within the permanent easement).
13. Describe how DTI and Atlantic would maintain access to and from residences and businesses during potential emergency situations (e.g., pipeline incidents).
14. Provide a schedule for submitting the Blasting Plan identified in section 1.5.2.8. Identify strategies to minimize and mitigate blasting effects on nearby utilities, residences, dams and other infrastructures, historic and cultural properties, and water resources, such as wells and springs.
15. Provide a Fire Prevention and Suppression Plan that identifies strategies to facilitate immediate actions to extinguish or control any construction-related fires and the strategies to control and monitor any project-related burns. The plan should establish protocols and lines of communication for reporting fires, describe the fire equipment that would be present during all project-related burns, and outline any fire training that would be provided to project personnel.
16. Provide a discussion or results of consultation with the West Virginia Division of Natural Resources regarding the crossing of the Lewis Wetzel Wildlife Management Area.
17. Describe the environmental impacts that would result from construction of each non-jurisdictional facility. Also, provide the applicable federal and/or state agencies responsible for the environmental review of these non-jurisdictional facilities

18. Section 1.2 states the purpose of the SHP and ACP Project is to provide natural gas to meet existing and projected future demand of power generation and provide fuel for residential, commercial, and industrial users. Identify in section 1.16 any electric generation projects, service pipeline projects, or local distribution projects that are reasonably foreseeable and assess the cumulative effects that could result from construction and operation of those projects and the planned SHP and ACP Projects.

Draft Resource Report 10 – Alternatives

19. Describe the ability to relocate the natural gas receipt and delivery points with planned customers to accommodate potential route alternatives or route variations.
20. Update the alternatives analysis to include route alternatives and route variations identified during the FERC's public scoping period and through DTI's and Atlantic's continued coordination with stakeholders.
21. For the Stuarts Draft Major Route Alternative, identify and analyze a route to the north and east of the three-school complex that avoids conservation easements.
22. For the Fort Pickett Major Route Alternative, identify and analyze potential pipeline safety impacts that could result from routing the pipeline through Fort Pickett.
23. For the Johnston County, North Carolina Major Route Alternative, identify the location of the planned industrial park on figure 10.5.1-6.
24. Sections 10.6.1.6 and 10.6.1.8 states the Mush Island and Red Oak Route Variations have been adopted; however, the topographic route maps in appendix 1A and the aerial route maps in appendix 1B do not indicate these variations have been incorporated into the route design. Ensure that all figure, maps, impact tables, and text in the draft Resource Reports consistently analyze the currently planned SHP and ACP Project.
25. Ensure that all federal lands are identified (including the appropriate land managing agency), that are crossed by each route alternative and all route variations.
26. In general, the no-action alternative, system alternatives, co-location alternatives, and all potential route alternatives should be considered and presented in greater detail in Resource Report 10 for agency review and comment. Identify and discuss any alternative or potential route alternative(s) that were dismissed from consideration and present evidence to support the specific environmental reasons for dismissing the alternative.