

11 Lake Catalpa Road  
Dallas, PA 18612  
June 24, 2014

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission (FERC)  
888 First Street, NE, Room 1A  
Washington, DC 20426

Re: Pre-filing docket # PF14-8-000

Dear Secretary Bose:

We are contacting you with our opposition to Williams' proposed pipeline through our property as part of the Atlantic Sunrise project.

We attended the May 20, 2014 Open House in Lehman and expressed our concerns to Williams at that time. While we did not and are not formally granting survey rights, we did ask our land agent, Craig Bass, to set-up a meeting with us and Williams' engineers to do a one-time walk through of our property together so that we could show our concerns to them. A walk up through the considerable side slope on the proposed pipeline path would reveal how obvious a problem this is given all of the natural springs and stream that feed our two ponds. To-date, we have not heard back from Craig Bass or any other representative of Williams regarding this matter.

We would have filed our complaint on-line but since it will not accept attachments, and the photos help clarify our opposition, we are submitting our concerns in writing as follows:

Already living on a wetland, water runoff significantly increased after land bordering our property was cleared to build the Goodleigh Manor Development. Additional run off from the ground that was cleared for the infrastructure above our property has resulted in siltation and eutrication of an existing pond. (Photos are attached of water issues we already have on our property after heavy rains and of pond eutrication.)

Our ponds are spring fed from the hills surrounding our property. Our home and ponds are situated in an alcove surrounded by the hills with the springs. Our home and out buildings are surrounded by hills on three sides. We simply cannot afford any more water runoff without serious and permanent damage to our property.

After significant rainfall or a winter or spring snow melt, we often experience flooding of our driveways, front lawns and Lake Catalpa Road then spilling onto Route 309. (Photos attached.) The public hazard is further increased in the winter when the overflow covers these roads with ice. Every year local fire/police put up safety horse flashing light barricades at the end of our driveway to slow or divert traffic after the road floods. Cutting down a 50 foot to 125 foot swath of trees on our steep side slope just behind our home would make our home flood. The additional runoff from so much ground devoid of trees would, besides flooding our property, cause runoff erosion and siltation. We have also lost several mature trees due to this now excessive increase of water in the soil.

Kimberly D. Bose, Secretary of FERC

Page 2

Kochan Objection

We have owned this property for 25 years. Our drinking water is drawn from 20 feet below the ground. We do not use any chemicals on our land or in our ponds as we do not want to endure the health risks or negatively impact the environment. We eat fresh fish out of our pond and grow organic vegetables. Penn Dot has honored our request to not spray any chemicals on the berm of the road bordering our property so that we do not have chemical runoff into our pond. We are also extremely concerned about Williams' use of chemicals on the swath of land they desire to cut for their pipeline, and its negative impact as it runs down to our land and ponds.

With Williams proposal to cut through the back of our property (the elevated alcove portion of our property, containing the springs to feed our ponds), there is no doubt we, and the community, would endure further water damage. Ripping out mature trees to be replanted with grass is not enough protection from further, and extensive, soil erosion and water damage. Moving the pipeline path to a higher elevation beyond the eastern boundary of our property would at least allow for a greater chance for the additional runoff to percolate.

We are hereby formally registering this objection with you now and requesting that Williams reroute this portion of the pipeline so as not to further negatively affect us.

Sincerely,

Walter & Robyn Kochan

[kochan@ptd.net](mailto:kochan@ptd.net)

570-675-2873

c w/attachments:

Gas Branch 2, PJ-11.2

Federal Energy Regulatory Commission

888 First Street, NE

Washington, DC 20426

Per a conversation with Sarah McKinley in FERC External Affairs today, we understand that the draft of the Environmental Study has begun for Williams' proposal of the Atlantic Sunrise project. Supposedly during this time, consultants study the terrain to make recommendations, approval, and occasionally go out to the land in question.

Within the year we have stated our concerns to both FERC and Williams about the impending destruction to our property from the planned pipeline route since we already experience severe flooding in heavy rainfall. We have submitted photographic evidence of the flooding onto two State roads. This has necessitated road crews blocking the area with lighted barricades to redirect road traffic from the hazard which is especially dangerous when freezing in the Winter. We asked Williams to at least move the pipeline further up the hill to lessen the amount of additional runoff, however, Williams did not do so in their proposal as submitted to FERC. How can "consultants" make a fair and reasonable determination of Williams' plan with respect to our concerns without visiting our actual property?

Another pipeline was placed in our community a few years ago. We personally know of numerous landowners who were told by the pipeline company that erosion control would be put into place. Presumably FERC and its "consultants" approved this. The erosion control was so shoddy the landowners are now experiencing more water damage today than they ever had. It is unreasonable that they have had to undergo their own expense to try and correct these damages with additional drainage methods. Is this the type of input and substandard efforts we can expect from FERC and Williams if their plan is approved to rip out a 150' wide x 500' long swath of mature trees on a 45 degree rocky side slope with three streams and numerous springs that surround our home? This is a wetland.

The outright lies and misrepresentation during this process is despicable to say the least. This morning a surveying crew for Williams trespassed our property, and returned a second time, even though they did not ask permission to survey our land. Is this an indicator of Williams fairly treating landowners and with respect?

Submitted via FERC website e-comments for Docket #CP15-138-000

**Kochan comment to FERC 7/9/2015**  
**re: Williams' Unresponsiveness to our Questions**

This comment of 7/9/15 relates to FERC's July 9, 2015 letter to William H. Hammons of Transco re: Environmental Data Request; and our prior comments of 6/16/15 which are still unaddressed and relate to FERC's May 19, 2015 questions on environmental data to William H. Hammons of Transco and their response dated June XX, 2015.

In the July 9, 2015 letter to Mr. Hammons, on page 6, #31, states, "Provide an update on the discussions with Landview Properties, Inc. regarding pipeline alignments across the Goodleigh Manor Subdivision, and with the neighboring property owners the Kochans."

We want to know why FERC has not asked for Transco/Williams to provide an environmental, engineering, and economic analysis of the two alternative alignments that we provided to FERC on 6/25/15 as we see that FERC has requested this information for others who have provided alternative routes.

Secondly, there have been NO discussions with us regarding the proposed pipeline through Landview Properties and ours so we would like to know what FERC is referring to. Is this another lie that Transco/Williams has conveyed to FERC --- that they have been discussing this with us, when in fact they have ignored our repeated requests for an explanation as to where the pipeline is routed through our property (when they stated in prior documents to FERC (see below) that the pipeline was re-routed to address our concerns)?

Likewise, we would like a response to our comments on 6/16/15 to FERC that have still NOT been addressed. Specifically they are as follows:

In our specific case, FERC questions were noted in table 10B-1 as: "*Transco indicated that it realigned the pipeline route near MP 25.8 along CPL North to address comments provided by Walter and Robyn Kochan. Explain how the realignment addresses the comments about drainage and runoff issues.*" (As we stated on 6/16/15, "In the nine months that we have been expressing our concerns about this route, NO ONE from Transco has communicated to us that they have realigned the route, or addressed our concerns.) We are now one-year later and still have not received any communication from Transco about where the route actually is, if it has been realigned, or an answer to the two alternate routes we submitted to FERC on 6/25/15.

Transco's response to the May 19th FERC inquiry was "*Transco conducted ground-based routing surveys of the pipeline survey corridor during the Federal Energy Regulatory Commission (FERC) pre-filing period, as detailed in Section 10.5.3 in Resource Report 10 of Transco's Certificate Application. (We asked on 6/16/15 what ground-based routing surveys are and the exact dates they say these were conducted. We still have not received an answer.) "Transco recognizes that drainage issues may naturally occur on the western portion the property, along Lake Catalpa Road, due to surrounding development. Erosion and sediment control devices would be used during*

*construction to reduce runoff on to the landowner's parcel.* (On 6/16/15 we said "Transco's statement sounds entirely ambiguous. We would like to know: what drainage issues may naturally occur and what does that mean; what type of erosion and sediment control is proposed for *after construction* when they have ripped out our mature trees and dynamited the rock along the proposed pipeline route? Is this the same type of erosion and sediment control that has been approved for other pipeline projects in our community, where landowners now have water problems that did not exist prior to pipeline installation for which they have had to remedy at their own and costly expense?") Today, 7/9/15 we STILL HAVE NOT RECEIVED ANSWERS TO THESE CONCERNS, nor has FERC addressed them in their 7/9/15 correspondence to Mr. Hammons.

We contacted three departments at FERC on 6/11/15 and no one could explain Transco/Williams responses or what the current proposed pipeline route is through our property. As stated on 6/15/15, we were told the route was unchanged yet Jennifer Kerrigan's May 19<sup>th</sup> letter indicates that Transco/Williams states it was realigned. The Transco map dated 5/26/15 with the route for our property does not appear to be changed from the one submitted on 3/31/15. The Landowner Helpline told us on 6/15/15 that no one can "tell us" what the route is; that everything must be posted as public comment and go back and forth.

We have posted public comment as dictated and are doing so again today (nearly one month later) and still our questions and concerns have not been addressed, and are not in Jennifer Kerrigan's July 9, 2015 letter to Mr. Hammons. How can this project be anything but a rubber-stamp approval, or grossly mis-managed, when no one at FERC (the regulatory agency), or Transco/Williams can tell us exactly where the route is on our property and how they will address our concerns?

Likewise, how is it that FERC allows Transco/Williams to conduct itself above and beyond the law as they openly lie to a federal agency and are not prosecuted? FERC's own website posts Title 18, United States Code, Section 1001 which makes it a crime to knowingly and willfully make any materially false, fictitious or fraudulent statement or representation in any matter within the jurisdiction of the enormous bureaucracy of the U.S. Federal government. Presumably, this includes FERC since they identify themselves as a "federal" agency. So why aren't the lies addressed that Transco/Williams tells to FERC?

To the May 19<sup>th</sup> FERC inquiry, Transco's other response was, "*Although survey access has been granted, Transco has been unable to coordinate and obtain detailed surveys due to unavailability of the landowner.*" (We stated on 6/16/15 that "Transco publicly filed outright lies that only serve to mislead FERC and the public" because we DID NOT GRANT surveying rights to them, and actually caught Transco/Williams survey crews trespassing our property twice on 5/15/15. They were in a white pick-up truck with Georgia license plate #AGS-0452. We called the police to report the trespasses." Likewise, we sat in meetings with their representatives and our town officials so stating we were unavailable was also untrue.) These are just our examples (not counting all the

other landowners who have similar experiences) of the lies Transco/Williams has stated to FERC which serve nothing else than to **intentionally mislead government officials**.

We expect a complete and timely response to our questions and concerns as stated above which includes: 1) where is the current pipeline proposed through our property; 2) how does Williams intend to handle the damages to our property from the increased water runoff if the pipeline is not re-routed from our steep side slope; 3) response on the two alternate routes we have proposed.



FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:  
OEP/DG2E/Gas 2  
Transcontinental Gas Pipeline  
Company, LLC  
Docket No. CP15-138-000  
§ 375.308(x)

August 19, 2015

Mr. William H. Hammons  
Regulatory Analyst, Lead Rates and Regulatory  
Transcontinental Gas Pipe Line Company, LLC  
2800 Post Oak Boulevard  
P.O. Box 1396  
Houston, TX 77251-1396

**Re: Environmental Data Request**

Dear Mr. Hammons:

Please provide the information described in the enclosure to assist in our analysis of the above-referenced certificate application by Transcontinental Gas Pipe Line Company, LLC (Transco) for the Atlantic Sunrise Project (Project). File your responses in accordance with the provisions of the Commission's Rules of Practice and Procedure. In particular, Title 18 Code of Federal Regulations (CFR) 385.2010 (Rule 2010) requires that you serve a copy of the response to each person whose name appears on the official service list for this proceeding.

**You should file a complete response within 20 days of the date of this letter.** The response must be filed with the Secretary of the Commission at:

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

If certain information cannot be provided within this time frame, please indicate which items will be delayed and provide a projected filing date. **You should be aware that the information described in the enclosure is necessary for us to continue preparation of the environmental impact statement (EIS) for the Project. Once we**

Docket No. CP15-138-000

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**have received your responses and reviewed them for completeness, we will be able to establish a schedule for completing the EIS.**

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Commission's website at [www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp](http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp). Any Critical Energy Infrastructure Information should be filed as non-public and labeled "**Contains Critical Energy Infrastructure Information – Do Not Release**" (18 CFR 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.**"

File all responses under oath (18 CFR 385.2005) by an authorized Transco representative and include the name, position, and telephone number of the respondent to each item.

If you have any questions, please contact me at 202-502-8954. Thank you for your cooperation.

Sincerely,

Jennifer Kerrigan  
Environmental Project Manager  
Gas Branch 2

Enclosure

cc: Public File, Docket No. CP15-138-000

Enclosure

**ENVIRONMENTAL INFORMATION REQUEST**  
**Transcontinental Gas Pipe Line Company, LLC**  
**Docket No. CP15-138-000**

**Resource Report 3 – Fish, Wildlife, and Vegetation**

1. Draft Biological Assessment, Section 3.2 – Table 3.2-1 in the Draft Biological Assessment (BA) defines a separate action area for each species. Please define one action area for the project and provide a map or figure of the action area. In addition, define separate zones of impact for each species to facilitate report organization and analysis of direct/indirect and short-term/long-term effects.

**Resource Report 6 – Geological Resources**

2. Provide a response to the comments filed by Thomas Byron on August 6, 2015, regarding restrictions on blasting near the proposed pipeline.

**Resource Report 9 – Air and Noise Quality**

3. July 29, 2015 Data Response – In response to question 20 of the July 9, 2015 data request, the U.S. Environmental Protection Agency guidance provided (*Calculating Potential to Emit (PTE) for Emergency Generators*) is outdated and not consistent with recent New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants (Subparts JJJJ and ZZZZ) for emergency generator engines. Provide confirmation from the Pennsylvania Department of Environmental Protection (PADEP) that these emergency engines are to be limited to 500 and not 100 hours per year.
4. July 29, 2015 Data Response– In response to question 21 of the July 9, 2015 data request, the construction emissions in nonattainment and maintenance areas for 2016 and 2017 exceed the general conformity threshold for carbon monoxide and nitrogen oxides. Provide a general conformity determination. Include in this determination the actual project/facility (e.g. compressor station, pipeline construction, etc.) rather than just the locality of the emissions (e.g. Lancaster, Pennsylvania).

**Resource Report 10 – Alternatives**

5. Provide an environmental, engineering, and economic analysis of the alternative routes identified by Robyn and Walter Kochan near milepost (MP) 25 of Central Penn Line (CPL) North. The analysis should include the following information so that a quantitative comparison can be made with Transcontinental Gas Pipe Line Company, LLC's (Transco) proposed route in this area:

- a. the length of pipeline (miles);
- b. the acreage of both the permanent and construction rights-of-way;
- c. the size and location of any non-typical work areas required;
- d. the number of residences within 50 feet of the edge of the construction right-of-way;
- e. the number of waterbodies and wetlands crossed, and the length of each crossing;
- f. the acres of agricultural land affected;
- g. the acres of forest cleared; and
- h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

6. Provide an environmental, engineering, and economic analysis of the alternative routes identified by Garry and Bonnie Gross near MP 68 of CPL South. The analysis should include the following information so that a quantitative comparison can be made with Transco's proposed route in this area:
  - a. the length of pipeline (miles);
  - b. the acreage of both the permanent and construction rights-of-way;
  - c. the size and location of any non-typical work areas required;
  - d. the number of residences within 50 feet of the edge of the construction right-of-way;
  - e. the number of waterbodies and wetlands crossed, and the length of each crossing;
  - f. the acres of agricultural land affected;
  - g. the acres of forest cleared; and
  - h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

7. Provide responses to comments and include an environmental, engineering, and economic analysis of the alternative routes identified by Patrick Kelsey in filings dated August 16, 17, 19, and 26, 2014, and October 9, 2014. The analysis should include the following information so that a quantitative comparison can be made with Transco's proposed route in this area:
  - a. the length of pipeline (miles);
  - b. the acreage of both the permanent and construction rights-of-way;
  - c. the size and location of any non-typical work areas required;
  - d. the number of residences within 50 feet of the edge of the construction right-of-way;
  - e. the number of waterbodies and wetlands crossed, and the length of each crossing;
  - f. the acres of agricultural land affected;
  - g. the acres of forest cleared; and
  - h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

8. Provide an environmental, engineering, and economic analysis of the alternative route identified by Thomas Byron near MP 22.6 of the CPL North. The analysis should include the following information so that a quantitative comparison can be made with Transco's proposed route in this area:
  - a. the length of pipeline (miles);
  - b. the acreage of both the permanent and construction rights-of-way;
  - c. the size and location of any non-typical work areas required;
  - d. the number of residences within 50 feet of the edge of the construction right-of-way;

- e. the number of waterbodies and wetlands crossed, and the length of each crossing;
- f. the acres of agricultural land affected;
- g. the acres of forest cleared; and
- h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

- 9. In response to comments provided by Thomas Zagami regarding the property owned by MFS, Inc., provide information on how Transco would address the concerns regarding the development of the property.
- 10. Provide an environmental, engineering, and economic analysis of the alternative route identified by John and Deborah Sowers on August 14, 2015 between MPs 5.5 and 6.7 of CPL South. The analysis should include the following information so that a quantitative comparison can be made with Transco's proposed route in this area:
  - a. the length of pipeline (miles);
  - b. the acreage of both the permanent and construction rights-of-way;
  - c. the size and location of any non-typical work areas required;
  - d. the number of residences within 50 feet of the edge of the construction right-of-way;
  - e. the number of waterbodies and wetlands crossed, and the length of each crossing;
  - f. the acres of agricultural land affected;
  - g. the acres of forest cleared; and
  - h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

11. On August 10, 2015, Linda Quodomine filed comments on CPL South Alternative 24 regarding potential inaccuracies in the analysis in the July 29, 2015 data response. Respond to her comments.
12. Provide the names and addresses for the landowners located along the following alternative routes:
  - a. CPL South Alternative 21;
  - b. CPL South Alternative 22;
  - c. CPL South Alternative 23;
  - d. CPL South Alternative 24; and
  - e. The alternative routes identified in questions 5 and 6 above.

Document Content(s)

CP15-138-000 AUGUST 19 2015.DOC.....1-7

**Kochan Comment to FERC on Feasability of Alternative Route #10 Originally Submitted on 8/20/2015**

In Transco/Williams 8/28/15 response to FERC's 8/19/15 inquiry, they stated they have reviewed the four alternative routes we have provided and denied them all.

First, we would like to know how Transco/Williams can realistically deny these routes when they have not surveyed our property. We granted them a one-month survey access in August for the purpose of reviewing these routes and they did not do so.

Second, a new landman, Ed Anderson, our next door neighbor, Ray Jackloski, and we have all agreed that the route we submitted on 8/20/15 (which we presume Transco/Williams is identifying as Alternative Route #10) makes more sense. This alternative is preferable to all of us because it is higher up on the hill on a more level piece of land further from our home and outbuildings; and since it is higher up the hill, it does NOT cut across our steep side slope. This alternative would eliminate significant damage to Mr. Jackloski's and our properties, and the public roadways.

However, in Transco/Williams's 8/28/15 response to FERC, they denied Alternative #10 on the basis it would cut more trees. Both Mr. Jackloski and we are agreeable to having more trees cut from our own properties to alleviate having the pipeline closer to our homes and thwart significant damages their existing route would cause to our properties and public roadways of which Dallas Twp. and the PennDOT are well aware of. The new landman Mr. Anderson called Kelli Bell at their office who stated they would have to survey to assess this route. Again we sent them our permission to survey for only one month (September) and only for this purpose. We ask FERC to hold Transco/Williams accountable to do this survey and provide a realistic response to our Alternative Route #10.

It should be noted that Ed Anderson appeared at Mr. Jackloski's yesterday because he stated that the window was closing and Mr. Jackloski must sign the contract to get the project underway. Mr. Jackloski refused to sign the contract, stating he did not like the proposed route. Mr. Jackloski explained that Williams wants to run their pipeline through his septic drainage field and has only offered him pennies to use his driveway. Ruining Mr. Jackloski's septic drainage field would eliminate his ability to properly dispose of human sewage on his property. It would then cost him nearly \$30,000 more to install a sand mound replacement system (which is the requirement in our township), not to mention the lengthy inconvenience of not being able to live in his own home without proper sanitation, or what the runoff will do to our property which sits below Mr. Jackloski's. It is in that regard that Mr. Jackloski and Mr. Anderson walked the land yesterday and saw the steep side slope, and all of us agreed that Alternative Route #10 is in the best interest of everyone --- including Transco/Williams.

Mr. Anderson reiterated that that the window is closing, and that once it has closed no route variations will be made. He also said Transco/Williams would not talk to any new landowners.

Third, we would like to know how FERC can allow Transco/Williams to treat landowners unethically and not hold them accountable as in the following specifics for our case, not to mention the thousands of other complaints submitted by landowners forced into this project:

- For over one year, we have requested a route variation to avoid damage to our property and Williams has been non-responsive, not giving us a copy of their current route until two months ago (July 2015) when we had to pay a lawyer who demanded we receive a copy. How can FERC allow Transco/Williams to not respond to our concerns for over one-year and let time lapse without working with us for a reasonable solution?
- How can Transco/Williams be allowed to develop an initial route without surveying and then say it is set in stone when they have no realistic data of what the route is destroying?
- How can FERC allow Transco/Williams to deny our alternate routes without surveying?
- How can FERC allow Transco/Williams to deny Alternate Route #10 on the basis it affects more trees when both Mr. Jackloski and we are willing to have more trees cut to avoid having the pipeline closer to our homes and to avoid the damages from excessive water runoff? This is especially true if FERC reads the commentary provided by Transco/Williams regarding this route as they have stated it is not a longer route, does not affect streams, waterbodies, etc. How can FERC stand idly by and allow Transco/Williams to be totally unreasonable and not act in good faith by denying this route, and particularly if they again refuse to survey to further investigate Alternative Route #10?
- How could Transco/Williams respond to our alternate route that was submitted to FERC on “8/20/15” when FERC wrote their inquiry the day before, on “8/19/15?”

Lastly, Transco/Williams has still not responded to us or to FERC as to how they will mitigate additional runoff which would damage our property if they are allowed to place their pipeline as proposed. For them to state in their 8/28/15 response to FERC, “...the majority of runoff from the Project will occur through overland flow from *temporarily* disturbed areas to *undisturbed* areas outside the right-of-way” is unconscionable. When they place their pipeline and have dynamited through rock that is not “temporary.” That is a permanent restructuring of the land. Further, for the overland flow to run to “undisturbed areas outside the right-of-way” essentially means it will flow to our home, outbuildings and roadways because they will be cutting through our steep side slope surrounding our home. **Ripping out mature trees from the steep side slope is NOT “temporary” when it is those very trees that cannot hold back the excessive water during heavy rains now, and when Transco/Williams will not be replanting trees on that same parcel of land.**

The data in Table 10G-14 is incorrect. Both the proposed route and Alternative #10 claim to cross the same amount of distance. It also claims that the forest interior crossed in miles is doubled using the Alternative #10 route when in fact they are the same as the land on all of our property is forested.

**For Transco/Williams to state “The right-of-way [on our property] will involve a change in cover from woodland to meadow” and that “this conversion is not *expected* to increase the runoff produced from the drainage area to the Kochan parcel since the expected runoff volume coefficient and peak rates for pre-construction (woodland) and post-construction (meadow) conditions are approximately the same” is a preposterous statement. A wooded area and a meadow, particularly after it’s been compacted with heavy machinery and allows water to roll-off rather than percolate into the ground are NOT comparable for run-off. Certainly, an expert study needs to be done to prove this *before* this project would be allowed to destroy our property.**

FERC needs to act responsibly and hold Transco/Williams accountable for its unethical business practices and dealings with landowners. We expect that before FERC grants rights to Transco/Williams that they will request action and specific responses to our valid concerns as noted herein.

## **Kochan Request/Comment to FERC re: Proposed Alternative Routes 8/25/15**

Our next door neighbor called us tonight because they are very upset with the route Transco/Williams proposes and for using their driveway for equipment. They said they do not understand why Transco/Williams proposes to cut through their best piece of property or ours, and why they are not going further up the hill behind his home so as not to destroy his property or ours from excessive run-off. The destructive route Transco/Williams proposes does not make sense to him (or to us). Further, he stated the landman said our neighbor needs to hurry and sign the contract because they need to get going on this project. We would like to know how the landman could state this if Transco/Williams has not yet received approval from FERC. This is not the first time we have heard that landmen in our area have told landowners the project will go through and construction will begin next year. If that is true, this is not a democratic or transparent process.

Just 4 business days ago, on 8/19/15, FERC requested Transco/Williams to provide an environmental, engineering and economic analysis of the alternate routes we proposed to alleviate destruction to our property as well as eliminate public hazard to the roadways from the excessive run-off their pipeline will create by cutting across our steep side slope. To-date, Transco/Williams has not posted their findings to this on the FERC website. We would like to know how Williams can bulldoze ahead with their proposed route when they have not responded about the alternate routes we proposed which would eliminate destruction to our neighbors and our properties. It appears Transco/Williams has not taken FERC's request seriously and has not investigated these routes. This is unethical. We would like answers.

**Excerpt from**

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC  
DOCKET NO. CP15-138-000 — Atlantic Sunrise Project  
Resource Report 10 – Alternatives  
Responses to FERC Data Requests dated August 19, 2015  
August 28, 2015

**Re: Kochan Property**  
**(Pages 17-19 of 132 page Transco Report)**

*(Kochans disagree with Transco's commentary for Route #10, particularly since Transco had not surveyed our property to determine and report accurately.)*

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC  
DOCKET NO. CP15-138-000 — Atlantic Sunrise Project  
Resource Report 10 – Alternatives  
Responses to FERC Data Requests dated August 19, 2015  
August 28, 2015

**Data Request No. 5**

Provide an environmental, engineering, and economic analysis of the alternative routes identified by Robyn and Walter Kochan near milepost (MP) 25 of Central Penn Line (CPL) North. The analysis should include the following information so that a quantitative comparison can be made with Transcontinental Gas Pipe Line Company, LLC's (Transco) proposed route in this area:

- a. the length of pipeline (miles);
- b. the acreage of both the permanent and construction rights-of-way;
- c. the size and location of any non-typical work areas required;
- d. the number of residences within 50 feet of the edge of the construction right-of-way;
- e. the number of waterbodies and wetlands crossed, and the length of each crossing;
- f. the acres of agricultural land affected;
- g. the acres of forest cleared; and
- h. the miles of right-of-way that would be parallel or adjacent to existing rights-of-way.

Transco may supplement its response with other information that may be relevant to the analysis of the alternative and/or with suggested modifications to the route that would result in fewer environmental impacts.

**Response:**

Transco has reviewed the comments filed by the Kochans on June 25 and August 20, 2015. Four minor alternatives, CPL North Alternatives 7, 8, 9 and 10, have been developed based on the routes described in the Kochan's comments. The alternatives are located in Dallas Township, Luzerne County, Pennsylvania. The alternatives begin as far south as MP 24.3 and extend as far north as MP 26.8. The locations of these alternatives are shown on Figures 10F-11 – 14 in Attachment 10-1. Tables 10G-11 – 14 provided in Attachment 10-2 provide a comparison of these alternatives and the corresponding sections of the June 2015 proposed route.

CPL North Alternative 7 is approximately 1.7 miles in length, approximately 0.1 miles longer than the corresponding section of the June 2015 proposed route. This alternative impacts more forested land than the corresponding section of the proposed route. One residence is located within 50 feet of this alternative while no residences are within 50 feet of the June 2015

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC  
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proposed route. This alternative and the corresponding section of the proposed route both cross one stream. No wetland complexes are crossed by this alternative or the corresponding section of the proposed route based on review of available data. Transco has not incorporated this alternative into the proposed route due to the increased impacts to forested land and the presence of a residence within 50 feet of the construction workspace.

CPL North Alternative 8 is approximately 2.1 miles in length, approximately 0.2 miles longer than the corresponding section of the June 2015 proposed route. This alternative and the corresponding section of the June 2015 proposed route would affect the same amount of forested land and waterbodies. No wetland complexes are crossed by this alternative or the corresponding section of the proposed route based on review of available data. Three residences are located within 50 feet of this alternative while no residences are within 50 feet of the June 2015 proposed route. Transco has not incorporated this alternative into the proposed route due to the increased length and number of residences within 50 feet of the construction workspace.

CPL North Alternative 9 is approximately 1.3 miles in length, the same length as the corresponding section of the June 2015 proposed route. Both routes cross the same amount of forested land. This alternative crosses two waterbodies while the corresponding section of the proposed route crosses one waterbody. No wetland complexes are crossed by this alternative or the corresponding section of the proposed route based on review of available data. One residence is located within 50 feet of this alternative while no residences are within 50 feet of the June 2015 proposed route. Transco has not incorporated this alternative into the proposed route due to the increased number of waterbody crossings and residences within 50 feet of the construction workspace.

CPL North Alternative 10 is approximately 0.6 miles in length, approximately the same length as the corresponding section of the June 2015 proposed route. Both routes cross the same amount of forested land; however, CPL North Alternative 10 crosses more forest interior than the corresponding section of the proposed route. No waterbodies or wetland complexes are crossed by this alternative or the corresponding section of the proposed route based on review of available data. In addition, no residences are within 50 feet of the construction workspace for this alternative or the corresponding section of the proposed route. Transco has not incorporated this alternative into the proposed route due to the increase in impacts to forest interior.

In a letter submitted to the Commission on June 25, 2015, the Kochans expressed concerns regarding the potential for the Project to increase stormwater runoff on their property and PA State Route 309 (Tunkhannock Highway). Transco has evaluated the effect of changes to land cover on post-construction stormwater runoff. The Project is linear in nature and the majority of runoff from the Project will occur through overland flow from temporarily disturbed areas to undisturbed areas outside the right-of-way. For the Kochan property, runoff will flow from temporarily disturbed areas to existing forested and wooded areas outside the right-of-way. The Project area will be restored to original contours following pipeline installation, keeping existing

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drainage patterns intact. As a result, the change in runoff resulting from construction of the Project will be negligible. The right-of-way will also be permanently stabilized and the vegetative cover will be maintained as an herbaceous or meadow in good condition cover type. **For the Kochan parcel, this will involve a change in cover from woodland to meadow.** However, this conversion is not expected to increase the runoff produced from the drainage area to the Kochan parcel since the expected runoff volume coefficient and peak rates for pre-construction (**woodland**) and post-construction (**meadow**) conditions are approximately the same.

Prepared by: Casey Talento  
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Ecology and Environment, Inc.  
Phone: 716-684-8060



**Williams**

We make energy happen.™

-  Survey Centerline
-  Tract Boundary
-  Survey Corridor

CPL North Project

WALTER W KOCHAN

DALLAS, PA

R/W No: PA-LU-256 000

Created by: Universal Field Services

APN: 10C7 00A22A000

Date: 5/15/2014

0 170 340 510 680 Feet

*Note: Preliminary Study Area. The information presented in this map is not derived from survey and is intended for reference purposes only.*













## **Kochan Photos Commentary**

Included in the photos are examples of the water issues we currently face that affect our property and 2 state roads when we incur heavy rains.

In 2014, we mailed a packet of 13 photos to FERC with our opposition to the Transco/Williams pipeline through our yard. We electronically submitted 2 more photos of the water issues to our property and state roadways when we have heavy rains. This is at the foundation for why we have been asking FERC and Transco/Williams since inception to re-route the proposed pipeline on our property.

Transco/Williams also received 25 photos of these issues to underscore our plea.

Again, we are reiterating that additional runoff from the steep side slope surrounding our property puts us at risk of life, limb and home, and the public in danger from the hazard of flooding onto two state highways. We have repeatedly expressed these concerns to FERC and Transco/Williams yet have not had a response from either as to exactly how these damages will be avoided.



Federal Energy Regulatory Commission  
888 First Street, NE  
Washington, DC 20426  
Atlantic Sunrise Pipeline Project, Docket # CP15-138

June 1, 2015

To Whom It May Concern,

It has come to the attention of the Dallas Township Board of Supervisors that much of the 5.4-mile route of the Atlantic Sunrise Pipeline being planned to traverse through Dallas Township may pass through numerous properties containing and/or are comprised of watershed and/or questionable storm water drainage areas.

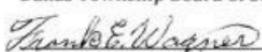
Of particular interest is the property belonging to Robyn and Walter Kochan, situated at 11 Lake Catalpa Road, at the intersection of SR 309 Highway, in Kunkle (Dallas Township). The Kochans live on a notoriously flood-prone property that is adversely affected during heavy rain events. Not only does the Kochan property experience extreme flooding, but rampant stormwater flow continues onto and over SR 309 Highway, a Pennsylvania Department of Transportation (PennDOT) roadway. Of concern to the Kochans, as well as this Board, is that the clear cutting of a 150-foot wide swath across a 25-45 degree slope, and resulting placement of the 30"-42" wide Atlantic Sunrise Pipeline immediately behind their home, may exacerbate the stormwater issues already present on and around this property.

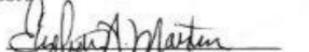
In addition, we feel that the steep mountainous and forested land belonging to Geraldine Nesbitt, as well as similar stormwater related issues affecting the Byron property, would be destined to similar fates. It has become apparent that the pipeline route selected by Williams-Transco to traverse Dallas Township may not have been properly researched from a geographical and/or storm water management perspective. It is a concern to the Board of Supervisors that these residents would be significantly and negatively impacted by the placement of this pipeline. In total, those residents who are in contention of the present pipeline route account for more than three of the 5.4-mile route through our municipality.

It has also come to the attention of our Board that alternate routes for the Atlantic Sunrise Pipeline exist, but this information has not been shared with the Township. To date, we have not received updated maps or plans from Williams-Transco. According to the Dallas Township Subdivision and Land Development Ordinance (SALDO), controls relative to stormwater management and watershed issues are in place. It is a requirement of the Dallas Township SALDO that any non-residential construction, particularly of this magnitude, would need to go through our planning process.

Sincerely,

Dallas Township Board of Supervisors

  
Frank E. Wagner, Chairman

  
Elizabeth A. Martin, Vice Chairman

  
William J. Grant

**Pages 117-120 of 1338 pages in May 2016 Draft Environmental Impact Study  
Excerpts Re: Kochan Proposed Alternate Routes**

CPL North Alternatives 7, 8, 9, 10, and 10A

In response to landowner concerns regarding drainage and flooding issues, impacts on pastureland and septic systems, and potential effects on the Goodleigh Manor Subdivision, we are evaluating five route alternatives near Kunkle, Pennsylvania, between MPs 24.3 and 26.8 of the proposed route (see figure 3.3.2-2).

Walter and Robyn Kochan (Kochans) provided comments and indicated that their property often floods after a significant rainfall and during spring snow melt and that the flooding often extends onto Lake Catalpa Road and Pennsylvania Route 309 (PA 309). The Kochans indicated that right-of-way clearing along the proposed route would increase stormwater runoff and exacerbate the flooding issues. The Dallas Township Board of Supervisors submitted comments and indicated that the Kochans live on a flood-prone property that is adversely affected during heavy rains and reiterated that clearing the pipeline right-of-way along the proposed route could increase flooding in and around their property. Jack Jackloski provided comments and indicated that the proposed route would affect his septic system and that construction activities would affect his pasture and his ability to care for his cattle and horses. Jim Comes, President of Landview Properties, Inc., submitted comments and expressed concern about the potential pipeline alignment affecting future residential development in the Goodleigh Manor Subdivision.

CPL North Alternative 7 (Alternative 7) follows the same alignment as the proposed route from MP 24.3 to MP 25.5. At MP 25.5, Alternative 7 deviates from the proposed route and proceeds west for 0.3 mile adjacent to the south side of PA 309 to the Kunkle Fire and Rescue Station. Alternative 7 then crosses to the east side of PA 309 and proceeds north for 0.1 mile, at which point it crosses Lake Catalpa Road. After crossing the road, Alternative 7 proceeds northeast adjacent to the west side of Lake Catalpa Road across primarily forestland before rejoining the proposed route at MP 26.8.

CPL North Alternative 8 (Alternative 8) deviates from the proposed route at MP 24.3 and proceeds east for about 1 mile across primarily pastureland and forestland adjacent to the south side of Stredney Road. From this point, Alternative 8 turns and proceeds north crossing Stredney Road and PA 309. After crossing PA 309, Alternative 8 continues north across pastureland, forestland, and the Goodleigh Manor Subdivision before rejoining the proposed route at MP 26.2. It then follows the same alignment as the proposed route to MP 26.8.

CPL North Alternative 9 (Alternative 9) follows the same alignment as the proposed route from MPs 24.3 to 24.9. At MP 24.9, Alternative 9 separates from the proposed route and proceeds east for 0.4 mile adjacent to the north side of a pipeline operated by PVR NEPA Gas Gathering, LLC. It then turns north and follows the same alignment as Alternative 8 to MP 26.8.

CPL North Alternative 10 (Alternative 10) follows the same alignment as the proposed route from MPs 24.3 to 25.6. At MP 25.6, the alternative turns and proceeds east for 0.1 mile following the southern property boundary of the Jackloski property to avoid bisecting his pasture and affecting his septic system. It then turns and proceeds north across forestland and the Goodleigh Manor Subdivision, eventually joining and following the same alignment as Alternatives 8 and 9 to MP 26.8.

CPL North Alternative 10A (Alternative 10A) follows the same alignment as the proposed route (and CPL North Alternative 10) to MP 25.6. The alternative then turns and proceeds east for 0.1 mile following the same alignment as CPL North Alternative 10 along the southern property boundary of the Jackloski property to avoid bisecting his pasture and affecting his septic system. From there, the

alternative proceeds northwest to MP 25.9 where it rejoins the proposed route. It then follows the same alignment as the proposed route to MP 26.8.

An environmental comparison of Alternatives 7, 8, 9, 10, and 10A to the corresponding segment of the proposed route is provided in table 3.3.2-4. *(We were unable to print this table or the map showing alternatives due to due to formatting.)*

The alternative routes and the proposed route are all about the same length. Alternatives 7 and 8 would follow existing rights-of-way for a greater percentage of their length (38 and 48 percent, respectively); however, because the alternatives are primarily collocated with roads, they would be closer to developments and residences than the proposed route and Alternatives 9, 10, and 10A.

Alternative 7 would avoid crossing residential lots within the Goodleigh Manor Subdivision. In contrast, Alternatives 8 and 9 would cross six residential lots, Alternative 10 would cross five lots, and Alternative 10A and the proposed route would cross four lots. Alternatives 8, 9, and 10 would also cross through the middle of the residential lots, which would preclude the development of the lots. Alternative 10A and the proposed route would minimize the number of lots within the Goodleigh Manor Subdivision that would be affected by the Project.

Alternatives 7 and 8 would cross the most forestland (1.9 miles) compared to Alternative 9 (1.7 miles), Alternative 10 (1.6 miles), Alternative 10A (1.7 miles), and the proposed route (1.6 miles). Alternative 9 would cross one more waterbody than the proposed route and the other alternatives. Melvin Morris provided comments and indicated that Alternative 8 would cross in close proximity to a lake he constructed on his property on the south side of Stredney Road and that construction could **increase erosion and sedimentation into his lake.** *(What about our two ponds and hazard to State Road #309?)*

As described above, we are recommending that Transco incorporate Alternative 5 into the proposed route. Because Alternative 5 ends north of Stredney Road, we have determined that Alternative 8 is no longer a viable alternative. With respect to the remaining alternatives, we do not believe that Alternatives 9 or 10 would address the concerns associated with the crossing of the Goodleigh Manor Subdivision. Because Alternative 10A addresses the concerns of the Kochans, Jack Jackloski, and the Goodleigh Manor Subdivision, **we recommend that:**

**• Prior to the end of the draft EIS comment period, Transco should file with the Secretary a revised alignment sheet that incorporates CPL North Alternative 10A between MPs 25.6 and 25.9 into the proposed route in consultation with landowners Kochans, Jackloski, and the Goodleigh Manor Subdivision.**

*(Tonight is 6/23/16 and Transco has not yet provided this information.)*