



**Transcontinental Gas Pipe Line Company, LLC**  
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713/215-2000

August 23, 2019

Mr. David Bolig | P.E.  
Project Manager  
PADEP Regional Permit Coordination Office  
Rachel Carson State Office Building  
400 Market Street  
Harrisburg, PA 17101

**RE: LEIDY SOUTH PROJECT – CLINTON, COLUMBIA, LUZERNE, LYCOMING,  
SCHUYLKILL AND WYOMING COUNTIES PENNSYLVANIA; SECTION 401 WATER  
QUALITY CERTIFICATION SUBMISSION**

On July 31, 2019, Transcontinental Gas Pipe Line Company, LLC (Transco), a subsidiary of The Williams Companies, Inc. filed an application with the Federal Energy Regulatory Commission (FERC) requesting a Certificate of Public Convenience and Necessity (Certificate) under Section 7(c) of the Natural Gas Act (NGA). The purpose of the proposed Leidy South Project (Project) is to enable Transco to provide 582,400 dekatherms per day (Dth/d) of incremental firm transportation capacity for abundant supplies of natural gas from northern and western Pennsylvania to existing and growing markets in Transco's Zone 6. Transco's Zone 6 includes the portion of the Transco system in Pennsylvania, New York, New Jersey, and Maryland. The Project consists of the following components:

- 6.3 miles of 36-inch pipeline loop along Transco's Leidy Line in Clinton County, Pennsylvania (Hensel Replacement) and the related abandonment of 5.8 miles of existing 23.375-inch pipeline on Leidy Line A;
- 2.4 miles of 36-inch pipeline loop along Transco's Leidy Line in Clinton County, Pennsylvania (Hilltop Loop);
- 3.5 miles of 42-inch pipeline loop along Transco's Leidy Line in Lycoming County, Pennsylvania (Benton Loop);
- Existing Compressor Station 605 (Wyoming County, Pennsylvania);
  - Increase the total certificated horsepower of the two electric motor-driven units from 30,000 horsepower (HP) to 42,000 HP and modifications to existing coolers;
- New Compressor Station 607 (Luzerne County, Pennsylvania);

- Install two gas turbine-driven compressor units (23,465 nominal HP at International Organization for Standardization [ISO] conditions each, 46,930 HP total) and gas coolers;
- Existing Compressor Station 610 (Columbia County, Pennsylvania);
  - Add one gas turbine-driven compressor unit (31,871 nominal HP at ISO conditions) and gas cooling;
  - Increase the total certificated horsepower of the two electric motor-driven units from 40,000 HP to 42,000 HP and re-wheel the existing compressors;
- New Compressor Station 620 (Schuylkill County, Pennsylvania);
  - Install one gas turbine-driven compressor unit (31,871 nominal HP at ISO conditions);
- Ancillary facilities, such as mainline valves (MLVs), communication facilities, cathodic protection and pig launchers and receivers in Pennsylvania.

Transco is submitting an application for a Section 401 Water Quality Certificate (401 WQC) for the proposed Leidy South Project. The Project will take place within Clinton, Columbia, Luzerne, Lycoming, Wyoming, and Schuylkill counties, Pennsylvania; however, the Project will not impact waters of the Commonwealth in Columbia, Wyoming and Schuylkill counties nor have any earth disturbance within Wyoming County. An electronic copy of the 401 WQC has been uploaded onto PADEP's FTP site. Three compact discs (CD) have been sent your attention.

#### Regulatory Background/Proposed Project Timeline

Transco's operations and the location of its facilities are subject to exclusive federal jurisdiction under the NGA (15 U.S.C. 717-171z). The facilities being constructed are "interstate natural gas pipeline facilities" which are subject to the regulatory authority of the FERC and of the United States Department of Transportation's (USDOT) Pipeline and Hazardous Materials Safety Administration (PHMSA). The regulatory authority of the FERC derives from the provisions of the Natural Gas Act (NGA), 15 U.S.C. §717, et seq., and the regulatory authority of the PHMSA derives from the Pipeline Safety Act, 49 U.S.C. §60101, et seq. State or local regulation of the location and construction of these facilities is preempted.<sup>1</sup>

FERC is the designated lead agency for the Project for purposes of coordinating all applicable Federal authorizations and for the purposes of complying with the National Environmental Policy Act (NEPA), 15 U.S.C. § 717n(b)(1). The Natural Gas Act requires each federal and state agency considering an aspect of an application for a Federal authorization to cooperate with FERC and comply with the deadlines established by FERC, 15 U.S.C. § 717n(b)(2). The purpose of this is to "ensure expeditious completion" of the review of all Federal authorization applications, 15 U.S.C. § 717n(c)(1). In accordance with FERC's regulations, each Federal or State agency responsible for a Federal authorization, must file with FERC within 30 days of the date of receipt of a request for a Federal authorization notice of, among other things, whether the application is ready for processing, and if not, what additional information or

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<sup>1</sup> *Schneidewind v. ANR Pipeline Co.*, 485 U.S. 293 (1988) (U.S. Supreme Court held that FERC has exclusive authority over the "rates and facilities" of interstate gas pipelines). *National Fuel Gas Supply Corp. v. Public Service Commission of New York*, 894 F.2d 571, 578-79 (2d Cir. 1990) (Court holding that the regulation of the "facilities" of interstate gas pipelines encompasses a site-specific environmental review by FERC). *NE Hub Partners, L.P. v. CNG Transmission Corp.*, 239 F.3d 333, 346 n.13, 348 (3d Cir. 2001) (Court holding that where FERC considers an issue prior to issuing a certificate, any state or local regulation on that issue is preempted).

materials will be necessary to assess the merits of the request., 18 C.F.R. § 385.2013. Each Federal or State agency must also provide, within 30 days of the date of receipt of a request for a Federal authorization, notice to FERC of the anticipated date of the agency's final decision, 18 C.F.R. § 385.2013.

Subject to the Federal Energy Regulatory Commission (FERC) approval of the Project and receipt of the necessary permits and authorizations, Transco anticipates that construction of the Project will commence in winter 2020/2021 to meet a target in-service date of December 1, 2021. Based on the federal and state requirements, waiver of the Section 401 WQC will be deemed to occur if PADEP fails or refuses to act on a request for certification within sixty days after receipt of such request, unless the district engineer for the U.S. Army Corps of Engineers determines that a shorter or longer period of time, not to exceed one year, is reasonable for the agency to act. 33 C.F.R. § 325.2(b)(1)(ii).

It is our hope that the information as provided will allow you to complete your review in accordance with your regulations and issue the requested 401 WQC in alignment with the proposed schedule. If you require any additional information that will facilitate your review, please do not hesitate to contact Shauna Akers at (713 )215-3012 or at [Shauna.Akers@williams.com](mailto:Shauna.Akers@williams.com), or Josh Henry at (412) 713-0485 or at [Josh.Henry@williams.com](mailto:Josh.Henry@williams.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Joseph Dean". The signature is written in a cursive style with a long horizontal stroke extending to the right.

Joseph Dean  
Manager, Environmental Health and Safety