Meeting Regarding the Atlantic Coast Pipeline Project
with the
Federal Energy Regulatory Commission

May 12, 2015

Attendees: Norman Bay (Chairman, FERC), Ann Miles (Director, Office of Energy Projects), Robert Kennedy (Advisor to Norman Bay), Judy Dunscomb (The Nature Conservancy), Kathryn Parker, Peggy Quarles

Introductions (Kathy Parker)

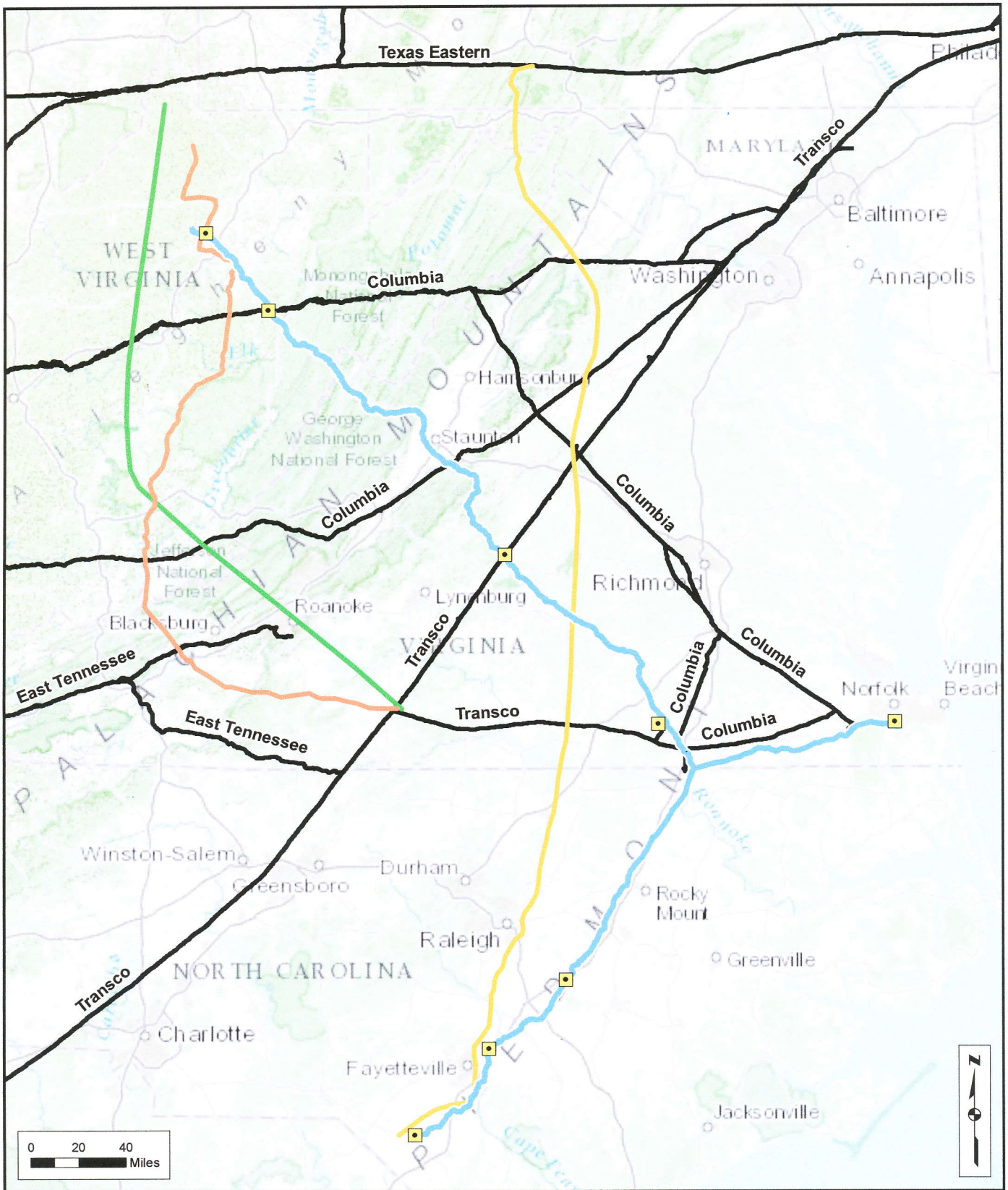
Our Concerns (Peggy Quarles and Judy Dunscomb)

- Multiple Pipeline Proposals over Central Alleghenies -- map
- Evaluate all four system alternatives in a fair and consistent way from Regional perspective
- Perform detailed and unbiased economic and market analysis of need
- Consider Programmatic EIS (PEIS)
- Impacts of the ACP Proposal on High Alleghenies (Judy)
    - GW and Monongahela National Forests
    - Red Spruce Ecosystems in High Alleghenies
    - Terrain and construction risks
    - Water quality and availability
    - Impacts on scenic and recreational value
- Establish de facto pipeline corridor

Questions about the PEIS

- At what point would FERC consider and implement a PEIS?
- Who would be involved in deciding whether and how to undertake a PEIS?
- What would the process look like to the public?

Handouts/materials: Dominion's ACP map, Alternatives map, TNC maps, fact sheet on Programmatic EIS



Atlantic Coast Pipeline

Atlantic Coast Pipeline
Receipt/Delivery Point
Existing Pipeline Systems

Proposed Pipeline Systems
Mountain Valley Pipeline
Spectra Carolina Pipeline
Transco Western Marcellus Pipeline

Atlantic Coast Pipeline
Figure 10.4-1
System Alternatives

NATURAL RESOURCE GROUP

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April 14, 2015

Pipeline Proposals Over Central Appalachian Mountains in Virginia and West Virginia

	Atlantic Coast	Mountain Valley	WB Express	Appalachian Connector
Capacity (billion cf/day	1.5+	2+	1.3 (additional)	2
Diameter	42”	42”	Multiple pipes and sizes	?
Status	Pre-filed	Pre-filed	Pre-filed	Planned
Type	New	New	Upgrade to pipes and compressor stations	New
NEPA Requirement	EIS	EIS	EA	EIS
Total Length	554	300	30 miles of pipe replacement, some new pipe	?
Projected In-service Date	Late 2018	4th Qtr 2018	June and Nov 2018	2018
Company	Dominion	EQT	Columbia/Ni-Source	Williams/Transco
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Programmatic Environmental Impact Statements

1. NEPA requires Federal agencies to consider the effects of proposed actions any reasonable alternatives on the human environment, including social, cultural, economic and natural resources.

2. "*Programmatic NEPA reviews address the general environmental issues relating to broad decisions, such as those establishing policies, plans, programs, or suite of projects, and can effectively frame the scope of subsequent site-and project-specific Federal actions*."

3. This guidance identifies four types of NEPA reviews for which a programmatic review should be considered. One of these is:

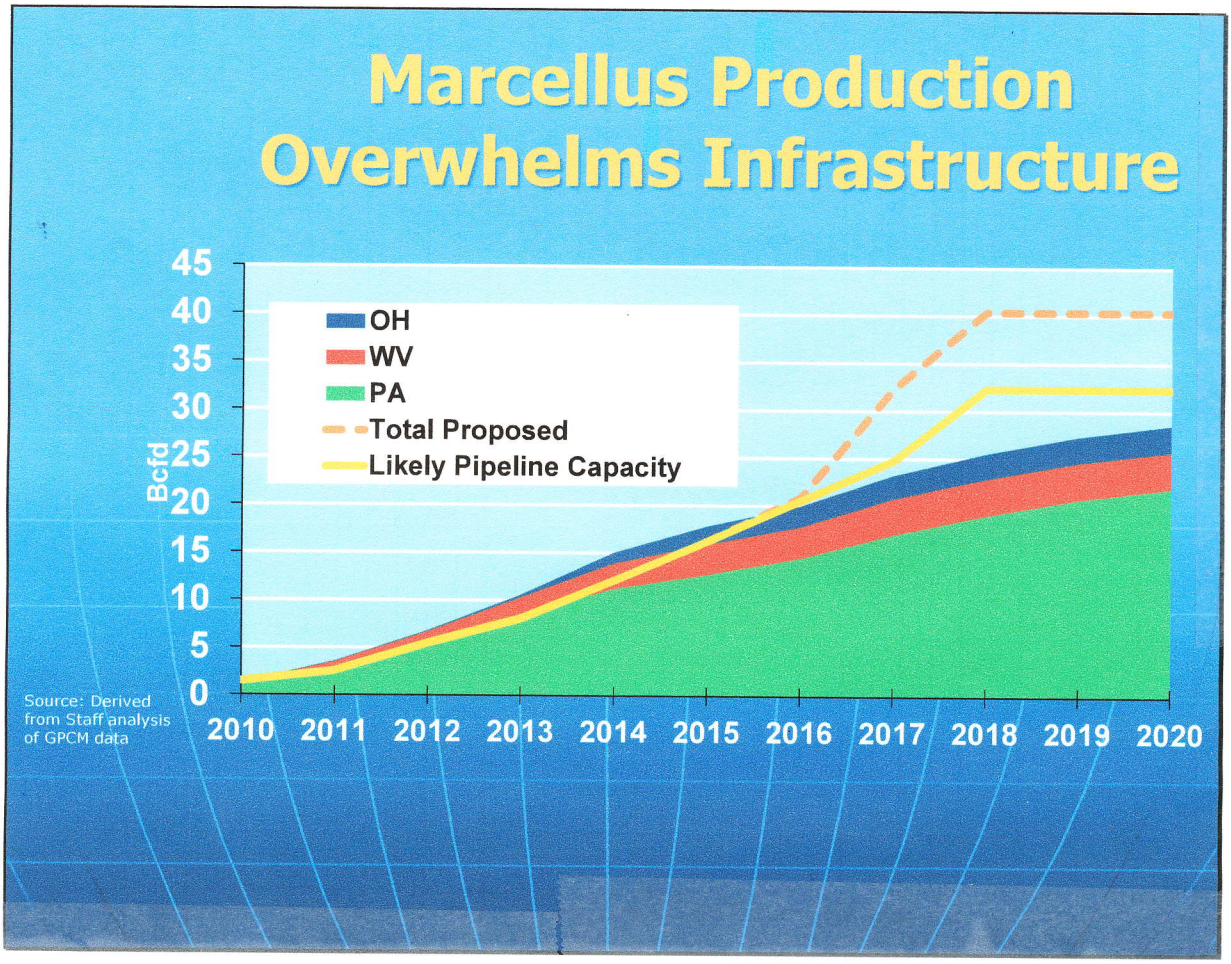
> "*Approving Multiple Actions. Decision to proceed with multiple projects that are temporally or spatially connected and that will have a series of associated concurrent or subsequent decisions.*
>
> *Programmatic examples include:*
>
> - *Several similar actions or projects in a region or nationwide (e.g., a large scale utility corridor project); or*
> - *A suite of ongoing, proposed or reasonably foreseeable actions that share a common geography or timing, such as multiple activities within a defined boundary (i.e., Federal land or facility)."*

4. History of Programmatic EIS. This is not a new concept and has been used for many years.

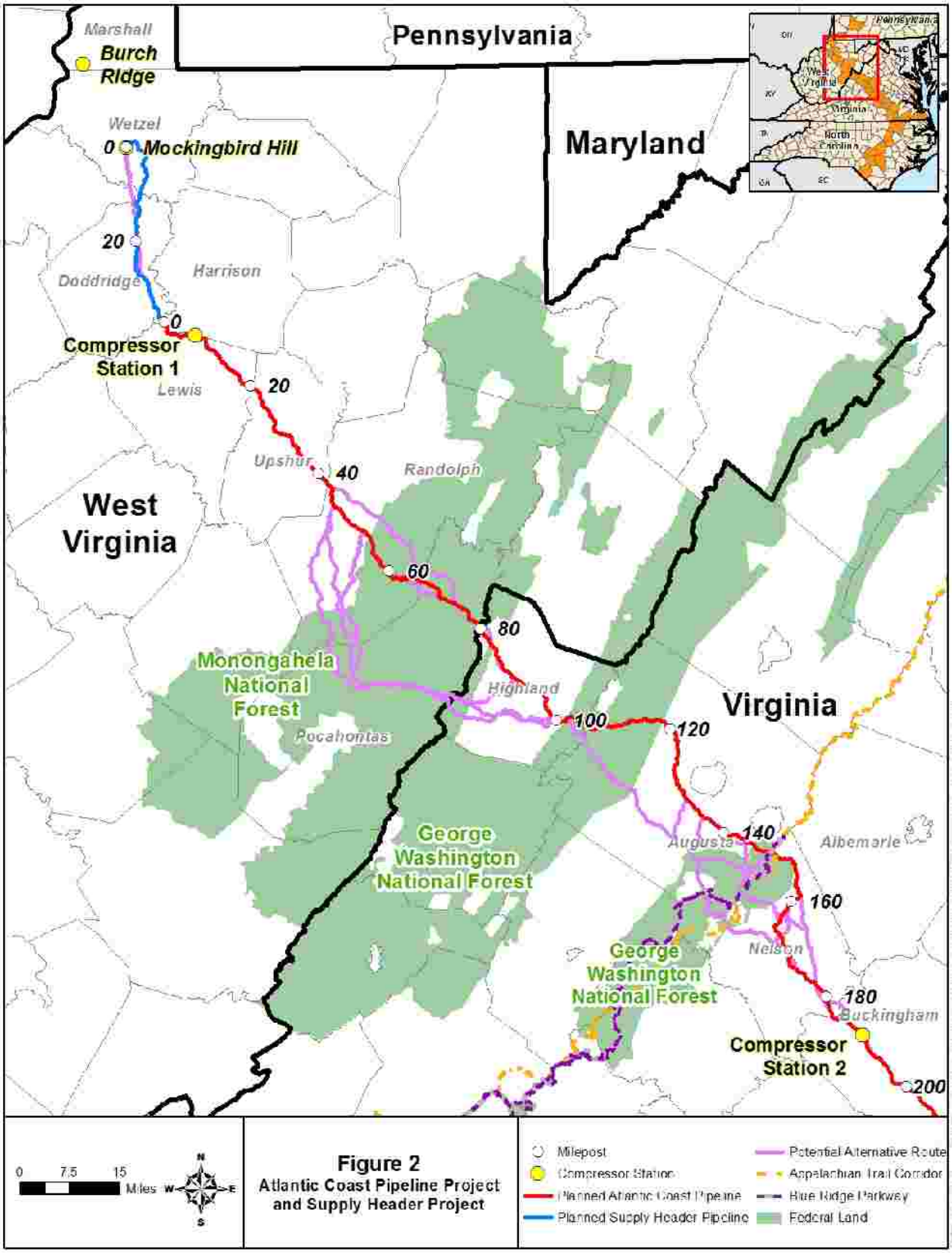
Relevant examples include:

- BLM Planning Process PEIS
- Pipeline Corridor Siting PEIS
- Wind Energy PEIS

Italicized quotes are from the Memorandum to Federal Agencies from CEQ, December 18, 2014.



From FERC – 2014 State of the Markets, Item No: A-3, March 19, 2015


Pennsylvania
Maryland
West Virginia
Virginia
Marshall
Burch Ridge
Wetzel
Mockingbird Hill
Doddridge
Harrison
Compressor Station 1
Lewis
Upshur
Randolph
Monongahela National Forest
Pocahontas
Highland
George Washington National Forest
Augusta
Albemarle
Nelson
Buckingham
Compressor Station 2
0
20
40
60
80
100
120
140
160
180
200
0 7.5 15 Miles
Figure 2
Atlantic Coast Pipeline Project and Supply Header Project
Milepost
Compressor Station
Planned Atlantic Coast Pipeline
Planned Supply Header Pipeline
Potential Alternative Route
Appalachian Trail Corridor
Blue Ridge Parkway
Federal Land

Take a Programmatic Approach to Pipeline Review

As stated in FERC's Notice of Intent (NOI) "the ACP Project would involve the construction and operation of 554 miles of variable diameter natural gas pipeline in West Virginia, Virginia, and North Carolina. The pipeline facilities associated with the ACP Project would be comprised of four main components as follows:

- approximately 295.6 miles of 42-inch-diameter pipeline in Harrison, Lewis, Upshur, Randolph, and Pocahontas Counties, West Virginia; Highland, Augusta, Nelson, Buckingham, Cumberland, Prince Edward, Nottoway, Dinwiddie, Brunswick, and Greensville Counties, Virginia; and Northampton County, North Carolina;
- approximately 179.9 miles of 36-inch-diameter pipeline in Northampton, Halifax, Nash, Wilson, Johnston, Sampson, Cumberland, and Robeson Counties, North Carolina;
- Approximately 75.7 miles of 20-inch-diameter lateral pipeline in Northampton County, North Carolina; and Greensville, Southampton, Suffolk, and Chesapeake Counties, Virginia; and approximately 3.1 miles of 16-inch-diameter natural gas lateral pipeline in Brunswick County, Virginia."

In its pre-filing letter to FERC, Atlantic Coast Pipeline LLC indicated its desire to commence construction activities in the fall of 2016, and a planned in-service date in the fall of 2018.

In addition to the ACP, The Conservancy is aware of three other pipeline projects in the region:

1) Mountain Valley Pipeline, LLC, has pre-filed with FERC for a Certificate of Public Convenience and Necessity to construct and operate the proposed **Mountain Valley Pipeline Project**, an approximately 294.1-mile, 42-inch diameter natural gas pipeline located in 16 counties in West Virginia and Virginia. The stated purpose of the project is to deliver gas from the Marcellus and Utica production areas to Transcontinental Gas Pipe Line Company, LLC (Transco) Zone 5 compressor station 165 to serve markets in the Mid-Atlantic, Southeast and Appalachian regions. In its pre-filing letter, the applicant indicated their desire to commence construction activities in January 2017.
2) Columbia Gas Transmission, LLC has pre-filed with FERC for a Certificate of Public Convenience and Necessity to construct and operate the proposed **WB XPress Project**. The WB XPress Project would involve the construction and operation of approximately 30 miles of various diameter pipeline, modifications to seven existing compressor stations, construction of two new compressor stations, and uprating the maximum allowable operating pressure on various segments of the WB pipeline system. All project components would be located in West Virginia and Virginia. The stated purpose of the project is to provide an additional 1.3 billion cubic feet per day of capacity for bi-directional firm transportation service to markets in western West Virginia and northern Virginia. In its pre-filing letter, Columbia has requested that FERC staff review the Project on a timeline that allows for construction activities to commence in early 2017.
3) On its company website, Williams has announced that it is in the preliminary planning stages for the **Appalachian Connector** project (formerly called the Western Marcellus.

project). Williams is in the early stages of performing desktop analysis to identify a study area for the potential route, which would extend from the Rockies Express pipeline near Clarington, Ohio, and Williams Oak Grove processing plant in Marshall County, West Virginia, to Transco's compressor station 165 in Chatham, Virginia. This project is an expansion of the Transco pipeline designed to move up to 2 billion cubic feet of natural gas per day by late 2018.

Each of these four projects is designed to transport shale gas from the Utica and Marcellus plays to customers in the eastern and southeastern U.S. and each must in some manner cross the rugged and ecologically sensitive terrain of the Appalachian Mountains. In light of the similarities in purpose, nature of environmental concerns, and timeline among these projects, and in order to meet the requirement that FERC consider cumulative impacts, The Nature Conservancy strongly urges FERC to consider the ACP, the Mountain Valley Pipeline, the WB XPress Project, and the Appalachian Connector under a Programmatic Environmental Impact Statement (PEIS) that would simultaneously consider the purpose and need of each project, the cumulative impacts of these projects on the Central Appalachian Region, and the optimal combination and alignment of pipelines to deliver gas from the Marcellus. and Utica shale gas plays to eastern and southeastern markets. Our request is consistent with the Council on Environmental Quality (CEQ) Guidance on "Effective use of Programmatic NEPA Reviews" issued on December 18, 2014, which states that a programmatic NEPA review may be appropriate when an agency is approving multiple actions, for example "Several similar actions or projects in a region."

A Programmatic and tiered NEPA review is clearly the most efficient means by which to conduct cumulative assessments of impacts from the suite of recently proposed projects and from additional pipelines that are a reasonably foreseeable result of the presence of a large reservoir of natural gas in the Marcellus and Utica formations and limited supply in the southeastern U.S. Again, as stated in the CEQ Guidance, "one advantage of preparing a programmatic NEPA review for repetitive agency activities is that the programmatic NEPA review can provide a starting point for analyzing direct, indirect, and cumulative impacts. Using programmatic NEPA reviews allows an agency to subsequently tier to this analysis, and analysis narrower, site- or proposal specific issues. This avoids repetitive broad level analyses . . . and provides a more comprehensive picture of the consequences of multiple proposed actions."

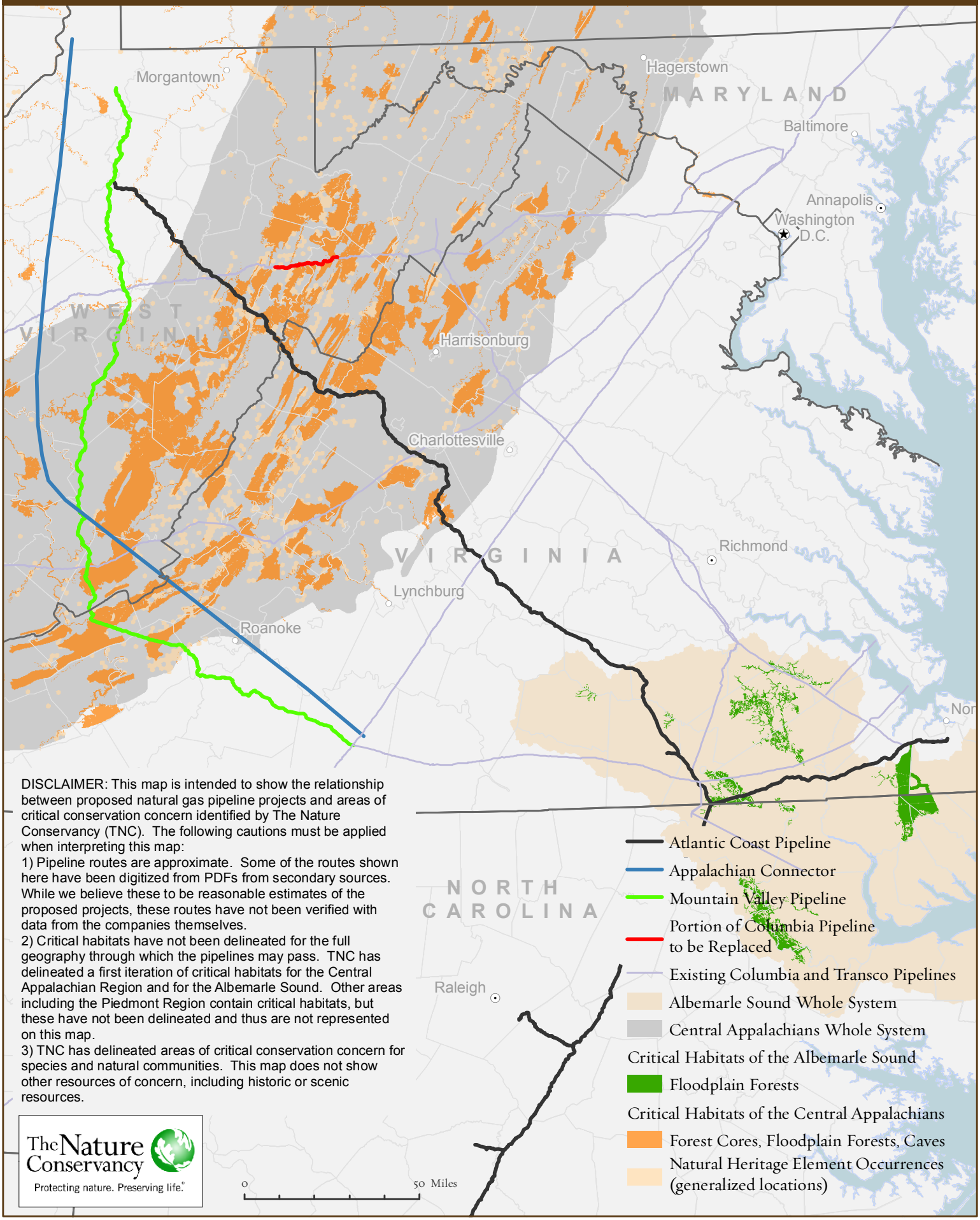
Analysis of different alignments and alternatives from multiple pipelines would also streamline evaluation consistent with George Washington National Forest land and resource management plan direction for special use authorizations and utility corridors to: "Locate uses where they minimize the need for additional designated sites and best serve their intended purpose. Require joint use on land when feasible." The Monongahela National Forest plan has similar direction requiring that: "Proposals for utility and communication facilities outside existing sites or corridors shall be considered only after improvement or expansion of existing facilities is determined to be inadequate or impractical."

Such a process also affords FERC a transparent and streamlined opportunity to evaluate the total demand for gas that infrastructure will be needed to meet. The Nature Conservancy strongly recommends that FERC develop a Final PEIS for mid-Atlantic shale gas pipelines prior to the

issuing of a Certificate of Public Convenience and Necessity for any of the proposed mid-Atlantic pipeline projects.

Development of such a programmatic approach should, we suggest, include the USDA Forest Service (USFS) U.S. Fish and Wildlife Service (FWS) and could be modeled on similar programmatic efforts, such as the PEIS for Solar Energy Development in Six Southwestern States (Solar PEIS) undertaken by The Office of Energy Efficiency and Renewable Energy (EERE), Department of Energy (DOE) and the Bureau of Land Management (BLM), Department of the Interior (DOI). The purpose of the Solar PEIS was to evaluate utility-scale solar energy development, develop and implement agency-specific programs or guidance that would establish environmental policies and mitigation strategies for solar energy projects, and to amend relevant BLM land use plans with the consideration of establishing a new BLM Solar Energy Program.

Map 2: Critical Habitats



DISCLAIMER: This map is intended to show the relationship between proposed natural gas pipeline projects and areas of critical conservation concern identified by The Nature Conservancy (TNC). The following cautions must be applied when interpreting this map:

1) Pipeline routes are approximate. Some of the routes shown here have been digitized from PDFs from secondary sources. While we believe these to be reasonable estimates of the proposed projects, these routes have not been verified with data from the companies themselves.

2) Critical habitats have not been delineated for the full geography through which the pipelines may pass. TNC has delineated a first iteration of critical habitats for the Central Appalachian Region and for the Albemarle Sound. Other areas including the Piedmont Region contain critical habitats, but these have not been delineated and thus are not represented on this map.

3) TNC has delineated areas of critical conservation concern for species and natural communities. This map does not show other resources of concern, including historic or scenic resources.

- Atlantic Coast Pipeline
- Appalachian Connector
- Mountain Valley Pipeline
- Portion of Columbia Pipeline to be Replaced
- Existing Columbia and Transco Pipelines
- Albemarle Sound Whole System
- Central Appalachians Whole System

Critical Habitats of the Albemarle Sound

- Floodplain Forests

Critical Habitats of the Central Appalachians

- Forest Cores, Floodplain Forests, Caves
- Natural Heritage Element Occurrences (generalized locations)

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