

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas Branch 1
Millennium Pipeline Company,
L.L.C.
Valley Lateral Project
Docket No. PF15-23-000

July 22, 2015

Mr. Gary A. Kruse
Vice President – General Counsel & Secretary
Millennium Pipeline Company, L.L.C.
One Blue Hill Plaza, 7th Floor
P.O. Box 1565
Pearl River, NY 10965

Re: Environmental Comments on Draft Resource Reports 1 and 10

Mr. Kruse:

Please find enclosed comments on the Millennium Pipeline Company, L.L.C. draft Resource Reports 1 and 10. The comments should be addressed in the next versions of draft Resource Reports 1 and 10.

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 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.”**

Thank you for your attention to this matter. If you have any questions, please contact me at (202) 502-8224.

Sincerely,

Anthony Rana
Environmental Project Manager
Office of Energy Projects

Enclosure

cc: Public File, Docket No. PF15-23-000

**Valley Lateral Project (Project)
Docket No. PF15-23-000**

Comments on Draft Resource Reports 1 and 10

General Comment: Provide/populate all data tables and information currently noted as TBD with planned Draft Resource Reports.

Draft Resource Report 1

1. In section 1.2, as related to the purpose and need of the Project, provide details regarding which specific older and less efficient electric generating units would be displaced by the construction and operation of the CPV Valley Energy Center.
2. In section 1.3, provide the diameter, maximum allowable operating pressure, and maximum operating pressure for the pipeline lateral.
3. Expand table 1.3-1, to include the type and name of the existing infrastructure where the proposed pipeline would be adjacent to or collocated with existing rights-of-way.
4. Clarify whether mainline block valves other than the tap valve at milepost 0.00 would be required; if so, identify the number and location, by milepost, for mainline valves in table 1.4-1.
5. In section 1.4.1.1, provide a table which summarizes the locations, by milepost, where the construction right-of-way would be 75, 100, or 135 feet wide
6. Provide a table listing and justifying deviations from the FERC *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures). This table should include the section of the Plan or Procedures for the requested deviation, the deviation itself, justification for the deviation, and how the deviation would provide equal or greater mitigation. If major modifications to the FERC Plan and Procedures are proposed, Millennium should provide its own modified versions of the documents that would be used during construction and operation of the Project.
7. In section 1.6, include additional information regarding horizontal direction drills (HDDs):

- a. clarify whether vegetation within the 10-foot access path along the HDDs would be cleared, and provide the clearing method, if applicable; and
 - b. identify the source for water that would be used for Project construction, including hydrostatic testing and HDDs.
8. In section 1.6.1.5, provide a table identifying foreign utilities that would be crossed by the Project.
9. Under section 1.11, incorporate by reference the New York State Environmental Quality Review Act findings statement.
10. Consult with land managing agencies, state and local planning agencies, and other appropriate entities to identify past, present, and reasonably foreseeable future projects (e.g., roads, bridges, mining, utility projects, other pipelines and compressor stations, large commercial/industrial/residential developments, etc.) in the potential resource area of impact that could be affected by the Project. Include the Minisink Compressor Station in the analysis of cumulative impacts. Millennium should describe how it defines the area of impact for each resource area, because the area of impact may vary by resource. Include a map showing the identified projects in relation to the planned Project.

Draft Resource Report 10

1. Provide additional detail on system alternatives 1 and 2, including a description of the necessary modifications required to meet the Project objectives and potential environmental impacts of system alternatives when compared to the Project.
2. Provide additional detail on CPV Potential Routing Options 1, 2, and 4 that led to their being eliminated for further consideration. Provide a figure showing CPV Potential Routing Options 1, 2, and 4.
3. Provide an analysis of additional route alternatives which utilize as a tie-in, Millennium's existing mainline and include alternatives which have the potential to collocate to a greater extent with existing infrastructure, including railroads and Interstate 84.
4. Add the following data to table 10.5-2, and include an analysis of CPV Potential Routing Options 1, 2, and 4 and any additional route alternatives:
 - a. total collocation with existing rights-of-way;
 - b. total construction and operational acreage;

- c. total acres of impacts on forested land; and
 - d. total acres of wetlands crossed (including forested wetlands and emergent/shrub-scrub wetlands).
5. For all route variations incorporated into the proposed route after the initial filing of draft Resource Reports 1 and 10, provide representative figures and tables detailing the locations, comparisons of impacts for relevant resources, and the ultimate reason for its incorporation.