

September 28, 2015

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

Re: Equitrans, L.P.
Docket No. PF15-22-000
Responses to Scoping Comments

Dear Ms. Bose:

Pursuant to Section 157.21(f)(9) of the Commission's regulations, Equitrans, L.P. submits herein its responses to the scoping comments filed in the captioned proceeding for the Equitrans Expansion Project.

Equitrans is providing a copy of this submission directly to Commission staff as well as to the third-party environmental contractor. Should you have any questions regarding this matter, please contact the undersigned by telephone at (412) 553-5786 or by e-mail at meggerding@eqt.com. Thank you.

Respectfully submitted,

Equitrans, L.P.



Matthew Eggerding

Attachment

cc: Paul Friedman, OEP
Lavinia DiSanto, Cardno, Inc.
Doug Mooneyhan, Cardno, Inc.

Equitrans Expansion Project – Response to Scoping Comments

FERC Comment/Date	Comment(s)	Response
Allegheny Defense Project And Ohio Valley Environmental Coalition 9/14/15	FERC must investigate whether Equitrans has any plans or proposals for replacing or modifying the remaining sections of the TP-371 line. FERC must also investigate whether Equitrans proposes any other replacement and/or upgrade projects since the TP-371 Replacement Project will increase the diameter of this portion of the line from 12-inch diameter to 20-inch diameter. Are there any plans or proposals to upgrade TP-301? If so, could that lead to an increase in capacity?	<p>Equitrans has no plans to replace the remaining segments of the TP-371 pipeline at this time. A replacement of the remaining TP-371 segments would not result in increased capacity, because there would still be other pipeline segments on the Allegheny Valley Connector (AVC) system that have an MAOP of 401 psig.</p> <p>Equitrans has no plans to upgrade or expand the TP-301 pipeline at this time. In any event, increasing the diameter of the TP-301 pipeline would not result in increased capacity, because there would still be other pipeline segments on the AVC system that have an MAOP of 401 psig.</p>

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<p>Allegheny Defense Project And Ohio Valley Environmental Coalition 9/14/15</p>	<p>The Mountain Valley Pipeline Project, Equitrans Expansion Project, and TP-371 Replacement Project should all be considered in the same EIS. In addition, FERC should consider all of these projects and the Ohio Valley Connector Project in a comprehensive EIS.</p>	<p>The decision to consider a joint EIS for certain projects or a programmatic/comprehensive EIS for all pipeline projects within the region resides with FERC. However, a joint EIS with the TP-371 Project or a programmatic EIS with both the TP-371 Project and the Ohio Valley Connector Project is not necessary or appropriate here. The Commission has decided to evaluate the Mountain Valley Pipeline Project (Docket No. PF15-3) and the Equitrans Expansion Project in the same EIS. The TP-371 Project and the Ohio Valley Connector Project are not connected or cumulative actions to either of those two projects or to each other. The projects all serve different markets and have different in-service dates. The Equitrans Expansion Project is not dependent upon, and does not trigger, the TP-371 Project or the Ohio Valley Connector Project. The Equitrans Expansion Project is market-driven and could proceed on its own, regardless of whether any other pipeline project is certificated. The Equitrans Expansion Project will operate at a higher MAOP and will provide a different service than the AVC system. The Equitrans Expansion Project is designed to take supplies south to MVP, as well as the TETCO and DTI markets. The TP-371 Project, on the other hand, serves a different purpose and is designed to replace existing vintage pipe serving current customers in different areas. The TP-371 Project is a continuation of the modernization program begun by Peoples (the prior owner of the AVC system) to upgrade the AVC system for integrity, reliability, and safety purposes. As part of the sale, it was agreed that Equitrans would complete the system upgrades, including the replacement of a portion of the TP-371 pipeline with 20-inch diameter pipe. Likewise, the Ohio Valley Connector Project is designed to take gas to Clarington, Ohio for redelivery to mid-continent and Gulf Coast markets.</p> <p>FERC has discretion whether to analyze similar actions in the same EIS. The Equitrans Expansion, TP-371, and Ohio Valley Connector Projects are not similar actions because of the different purposes and needs for the projects and the disparity in geography and time. The Equitrans Expansion Project serves different end points and markets as compared to the other projects. There is no basis for FERC to evaluate the environmental impacts for such fact-intensive projects in a joint EIS or a programmatic EIS. Further, a programmatic EIS would not assist FERC in meeting its obligations under NEPA.</p>

Equitrans Expansion Project – Response to Scoping Comments

FERC Comment/Date	Comment(s)	Response
Betty Jane Cline 9/14/15	The proposed pipeline will cross an area of Mrs. Cline’s property consisting of steep slope and slip-prone soil. The proposed project is to be located next to Sunoco’s Mariner East pipeline. Construction of the Mariner East pipeline has raised some concerns: (1) large “slips” have occurred on the steep slope where the Mariner East pipeline was constructed; (2) damage has occurred to the roadway; and (3) flooding has occurred. Equitrans should attempt to avoid this area and/or a detailed mitigation plan should be incorporated in the Environmental Impact Study to address the destabilization which will result (at a minimum, Equitrans must provide detailed information on soil characterizations and a stability analysis).	Areas of steep slopes and potential landslide concerns along the pipeline alignment are addressed in Section 6.4.5 in draft Resource Report 6. Avoidance, minimization, and mitigation for such hazards are discussed in Section 6.5.1.2 in draft Resource Report 6 with industry-accepted soil and slope stabilization methods employed. The co-location of this section of the pipeline alignment with the recently-constructed Sunoco Mariner East pipeline ROW will minimize impacts to slope stability. As detailed in Section 6.5.1.2 in draft Resource Report 6, Equitrans will minimize impacts by restoring contours to pre-construction conditions to the maximum extent practicable, in accordance with the FERC Plan and Procedures. Sunoco is responsible for mitigation of existing drainage and slope stability hazards related to the construction of Mariner East.
Betty Jane Cline 9/14/15	Recoverable coal seams on Mrs. Cline’s Property include the Pittsburgh, Redstone and Waynesburg Coal Seams. These coal seams have been successfully surface and deep mined on Mrs. Cline’s property and reserves still remain which are capable of being mined. Equitrans must specifically identify the mined-out areas on Mrs. Cline’s property and discuss in detail the issues associated with encountering these mined-out areas. Equitrans should also evaluating moving the proposed pipeline to an alternate location. In addition, Equitrans should acknowledge the possibility of future mining on Mrs. Cline’s property and discuss how the proposed pipeline will impact and/or limit this future activity.	<p>The potential for subsidence related to coal mining operations and possible encounters with water within the mine voids is addressed in Section 6.3.3 of draft Resource Report 6. Avoidance, minimization, and mitigation for such hazards are discussed in Equitrans’ Mine Subsidence Plan and Procedure in Appendix 6-B in draft Resource Report 6, and are summarized in Section 6.5.1.2. Section 6.3.3 and Table 6.3.3-2 in draft Resource Report 6 will be revised to include the omitted abandoned mine land. Detailed maps depicting active and closed mining operations within the Project area have been added as figures in draft Resource Report 6. In addition, based on the abandoned status of the mining operations on the Cline property and the surrounding area, any remaining coal should not be considered recoverable.</p> <p>Due to the narrow construction footprint of the pipeline alignment, the shallow depth of installation, and the co-location with the existing Sunoco Mariner East pipeline, impacts on the recovery of aggregates and coal (to the extent they are recoverable) will be minimal.</p>
Betty Jane Cline 9/14/15	The construction has the potential to adversely impact a stream (and potentially wetlands) on the Cline property. As such, Equitrans should discuss the impact which the proposed construction will have on the stream and any existing wetlands.	The stream and wetlands identified in the comment will be addressed in the updated Resource Report 2, section 2.3 and Appendix 2-B. Impacts to streams and wetlands as well as minimization and mitigation for impacts are discussed in Sections 2.2 and 2.3.

Equitrans Expansion Project – Response to Scoping Comments

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<p>PA Department of Conservation and Natural Resources, Department of Forestry 9/2/15</p>	<p>DCNR requests a survey for the following species:</p> <ul style="list-style-type: none"> • <i>Baptisia australis</i> (Blue False-indigo): locally documented on a rich wooded riverine slope; prefers open woods, stream banks, and sandy floodplains; flowers May – June • <i>Erythronium albidum</i> (White Trout-lily): locally documented in floodplain forest and on rich wooded slopes along rivers and creeks; prefers moist woods and rich slopes, especially on limestone; flowers April– May • <i>Iodanthus pinnatifidus</i> (Purple Rocket): locally documented on a rich wooded riverine slope; prefers moist alluvial woods and wooded slopes; flowers May – June • <i>Scutellaria saxatilis</i> (Rock Skullcap): locally documented in sycamore scrub floodplain; prefers low woods, rocky stream banks, and roadsides; flowers July – August • <i>Tipularia discolor</i> (Cranefly Orchid): locally documented in red oak mixed hardwood forest; prefers deciduous forest and stream banks; leaf visible fall, winter, and spring • <i>Trillium nivale</i> (Snow Trillium): locally documented on rich stream valley wooded slopes; prefers stream valleys and wooded slopes, especially on limestone; flowers late March – April <p>A survey for the above species should be conducted by a qualified botanist at the appropriate time of year and then submitted to our office for review.</p>	<p>Protected plant species that have the potential to occur within the Project area are addressed in Section 3.4.2 in draft Resource Report 3. Project field surveys for protected plant species will be conducted in 2016 (three separate surveys to be conducted during appropriate flowering periods) in accordance with guidelines set forth by federal and state agencies, USFWS, PADCNR, and WVDNR. Project surveys and consultation with USFWS, PADCNR, and WVDNR are ongoing. The results of these surveys will be provided in an appendix to Resource Report 3 as well as summarized therein, and also will be described as relevant in Resource Report 10 (for the alternatives). Results of the field surveys to be conducted in 2016 will be provided to FERC when they are complete.</p>
<p>Thomas W Headley 9/14/15</p>	<p>How does the Equitrans Expansion Project fall under the purview the Federal Energy Regulatory Commission? I disagree with the determination that this project qualifies for a FERC designation.</p>	<p>The facilities associated with the Equitrans Expansion Project are modifications, expansions and/or extensions of Equitrans’ existing FERC-regulated interstate transmission pipeline system, which can be viewed online at www.equitransproject.com.</p>
<p>Thomas W Headley 9/14/15</p>	<p>My farm is enrolled the Pennsylvania Agricultural Land Preservation Program. The Commonwealth of Pennsylvania has purchased an easement for the surface area of my entire property. The farm is likewise part of Forward Township’s Agricultural Security Area. The proposed H-318 pipeline crosses my property on or near a ridge line of a 40 acre hayfield/crop field with slopes on either side.</p>	<p>Equitrans continues to consult with local and state agencies to identify parcels that are managed by conservation agencies such as the Pennsylvania Agricultural Land Preservation Program. The Headley Farm will be appropriately identified and included in Section 8.3.1 of the final version of Resource Report 8. Potential impacts and proposed mitigation measures will be addressed in the final version of Resource Report 8. The final Resource report 10, section 10.4 will include a discussion of route alternatives that addresses such issues</p>

Equitrans Expansion Project – Response to Scoping Comments

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Thomas W Headley 9/14/15	The proposed pipeline route runs midway between two developed springs and through the center of the watershed feeding the farm pond. It is located on the slope above and within a short distance of the only reliable, ever-flowing spring on the farm.	Impacts to springs as well as minimization and mitigation for impacts are discussed in Section 2.1 of Resource Report 2.
Thomas W Headley 9/14/15	During a previous pipeline project muddy, silt laden water entered a spring and the farm pond. In addition, water runoff caused significant erosion on a steep slope through the woods. The contractor was cited by the Allegheny County Conservation District for the E&S failure. It is not unreasonable to expect similar problems with the proposed construction of H-318 since it follows the same route.	In accordance with state regulations and FERC guidelines, impacts to streams and wetlands will be avoided and minimized to the greatest extent practicable. Additionally, Equitrans will develop an Erosion and Sediment Control Plan in accordance with FERC’s Plans and Procedures and that meets state regulations.
Thomas W Headley 9/14/15	Pipeline construction will prevent access to, or use of a large portion of my farm fields for a significant period of time. The proposed pipeline route runs from property line to property line, there is no way to cross to the other side. The previous pipeline construction denied access for an entire year impacting two growing seasons.	As discussed in Section 8.1.3.1 of Resource Report 8, Equitrans will compensate landowners for any product loss or damages caused during construction activities, and will work with any agricultural production to move agricultural or grazing areas outside of the construction corridor if practicable. Equitrans will maintain the landowner’s access to fields and agricultural facilities during construction. After construction, agricultural lands will be restored to pre-construction conditions according to FERC’s Plan, any agreements with landowners, or in compliance with requirements identified by state or federal agencies with regard to agricultural lands. Construction on this section of the pipeline is scheduled to occur between February and November 2017 (see draft Resource Report 5, Table 5.2-1) and thus will impact one growing season.
Thomas W Headley 9/14/15	Equitrans can change the proposed location of H-318 and route the pipeline around my farm on EQT property. Equitrans/EQT has plans for a similar gathering pipeline that originates at the same location as H-318 and follows the route I am suggesting for H-318.	Equitrans acknowledges the concerns identified along the identified pipeline alternatives. Concerns identified to date are discussed under the appropriate pipeline alternatives in Sections 10.5 and 10.6 of draft Resource Report 10, including the route suggested in this comment. Equitrans will update the analysis of each alternative with information provided in comments and identified through other sources during the scoping process.

Equitrans Expansion Project – Response to Scoping Comments

FERC Comment/Date	Comment(s)	Response
<p>Pennsylvania Historical and Museum Commission, Bureau of Historic Preservation 9/2/2015</p>	<p>There is a high probability that significant archeological sites are located in this project area and could be adversely affected by project activities. Although there are no recorded archaeological sites within the project boundaries the soil type, topographic setting, slope direction, and distance to water of the project area are similar to the settings of known archeological sites in the vicinity. A Phase I Archeological survey of the project area is required to locate potentially significant archaeological resources.</p>	<p>Equitrans has initiated both Phase I archaeological and historic architectural field surveys within the mutually agreed-upon Area of Potential Effects (APE) for direct and indirect effects. Equitrans’ cultural resources team continues to reach out to coordinate with the Bureau of Historic Preservation about local cultural resources concerns. The team continues to take into consideration all of the concerns expressed about cultural resources and potential effects of the Project. Efforts are underway to avoid or minimize effects to cultural resources that may be listed in, or may be eligible to be included in, the National Register of Historic Places (NRHP).</p>
<p>Pennsylvania Historical and Museum Commission, Bureau of Historic Preservation 9/2/2015</p>	<p>Equitrans’ request does not include sufficient information. We are unable to proceed with review for historic structures until the information on the attached form is provided.</p>	<p>Equitrans has provided additional information to the SHPO to support the review of historic structures within the Project vicinity; consultation with the SHPO is ongoing and any further communication with the SHPO will be provided to the FERC.</p>
<p>West Virginia Department of Environmental Protection 9/8/15</p>	<p>Steep slopes and Slip-Prone Soil Types Recently there have been a number of pipelines constructed in West Virginia where landslides have occurred, causing environmental degradation. It has been the experience of WVDEP that these landslides have primarily occurred in areas with steep slopes, or in areas with slip-prone soils. Attention should be given to identification and avoidance of these areas, and mitigation measures should be incorporated into the design, with particular emphasis on soil characterizations and stability analyses. Working with the Natural Resources Conservation Service, WVDEP has compiled a starting list of slip prone soils. These soils, if encountered will need specifically addressed in the DEP’s Oil & Gas Construction Stormwater Permit application.</p>	<p>The Equitrans Expansion Project includes limited pipeline construction in West Virginia. Equitrans has characterized and evaluated detailed soils information by pipeline milepost in draft Resource Report 7 (Section 7.3) based on existing USDA soils data. Continued coordination with WVDEP and permitting of the Project will ensure that any slip prone soils will be considered during construction and if unable to avoid, mitigation measures will be implemented.</p>

Equitrans Expansion Project – Response to Scoping Comments

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West Virginia Department of Environmental Protection 9/8/15	<p>Abandoned, Active, and Reclaimed Mine Lands</p> <p>The proposed pipeline routes may encounter abandoned mine lands (AML), both surface and underground. In the EIS analyses, specific attention should be given in locating and identifying the possible consequences associated with encountering AMLs. As an example, creation of acid mine drainage by disturbing vegetated overburden or encountering large volumes of water in shallow subsurface workings are possibilities of concern. Further with respect to trenching mine sites, reclaimed by either the Abandoned Mine Land Program or mining companies (i.e. bond release sights), these sights may have employed material handling plans whereby toxic overburden has been isolated and capped to prevent water from entering the material. Locating and avoiding these areas should be given consideration. Analysis for subsidence from previous, active and future mining should be given consideration in the EIS.</p> <p>WVDEP has GIS coverages available for Abandoned and Surface Mining Control and Reclamation Act permitted operations. The West Virginia Geologic and Economic Survey has information on minable coal seams in the state.</p>	<p>The Equitrans Expansion Project includes limited pipeline construction in West Virginia. The potential for subsidence related to coal mining operations and possible encounters with water within the mine voids is addressed in Section 6.3.3 of draft Resource Report 6. Avoidance, minimization, and mitigation for such hazards are discussed in Equitrans' Mine Subsidence Plan and Procedure in Appendix 6-B in draft Resource Report 6, and are summarized in Section 6.5.1.2. A full inventory of active and closed coal mines within the Project area is included in Table 6.3-2 of draft Resource Report 6. There are no active or inactive mining operations within a 0.25-mile radius of the proposed Webster Interconnect facility in West Virginia.</p>
West Virginia Department of Environmental Protection 9/8/15	<p>Compressor Stations</p> <p>The EIS for these projects should evaluate the placement of proposed compressor stations, taking into consideration whether the area in which the source is being built is in attainment with National Ambient Air Quality Standards (NAAQS). These standards change from time to time, and WVDEP's air monitoring data may show areas which are not in attainment with the NAAQS. If this is the case, permitting of the source becomes more complex and the applicant should have pre-permitting discussions with WVDEP well in advance of construction of the source.</p>	<p>Compressor stations are not proposed as part of the Project in West Virginia. Equitrans will comply with all air quality rules in siting and construction of the Redhook Compressor Station located in Pennsylvania.</p>
West Virginia Department of Environmental Protection 9/8/15	<p>Stream, Wetland, and Mitigation Site Avoidance</p> <p>Adverse impacts to streams and wetlands must be avoided to the maximum extent practicable. Impacts will not be permitted if there is a practicable alternative with less adverse impacts. Any impacts that cannot be avoided must be minimized and mitigated for.</p> <p>Existing constructed mitigation sites including Corps approved mitigation bank sites, WVDEP In Lieu Fee sites, and permittee responsible mitigation sites are protected by legal mechanisms and must be avoided.</p>	<p>Impacts to streams and wetlands will be avoided and minimized to the greatest extent practicable. Ditch and smaller waterbody crossings will minimize impacts during construction and will be done in accordance with state and federal permits and the FERC's Plan and Procedures.</p>

Equitrans Expansion Project – Response to Scoping Comments

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West Virginia Department of Environmental Protection 9/8/15	<p>Karst Areas</p> <p>Extensive karst topography exists in eastern West Virginia, and we are aware of heightened concerns relative to possible environmental and operational concerns voiced by a number of commenters. WVDEP geologists through professional and private interests have developed extensive mapping of karst features and have access to numerous dye studies and cave mapping resources.</p>	<p>Equitrans has evaluated the potential for karst topography and there are no known karst features in the Project area.</p>
West Virginia Department of Environmental Protection 9/8/15	<p>Tier 3 waters</p> <p>Tier 3 waters in West Virginia are known as “outstanding national resource waters” (ONRW), and include waters in Federal Wilderness Areas, specifically designated federal waters, and high quality waters or naturally reproducing trout streams in state parks, national parks, and national forests. Long term degradation of these waters is not allowed and impacts in these should be avoided. When they cannot be avoided, applications for projects discharging to or upstream of Tier 3 Waters must be public noticed and must go through Antidegradation Review. Advanced Best Management Practices are required and only short term limited impacts may be allowed.</p>	<p>The Project area is not within Tier 3 waters. Equitrans will plan the final Project route to minimize impacts to any sensitive and major waterbodies identified during on-going field studies.</p>
West Virginia Department of Environmental Protection 9/8/15	<p>A number of WVDEP permits/certifications will likely be needed should the project go forward. Acknowledgement of the following should be included in the environmental analysis: State Clean Water Act Section 401 Certification, Oil and Gas Construction Stormwater Permit, Hydrostatic Testing Discharge Permit, Industrial Stormwater Discharge Permit, Air Preconstruction Permit, and possibly Underground Injection Control for stormwater in karst areas.</p>	<p>Equitrans has been coordinating with WVDEP and WVDNR regarding the state required permitting. Based on Equitrans’ review of the state required permits, Industrial Stormwater Discharge Permit, Air Preconstruction Permit, and Underground Injection Control for stormwater in Karst areas will not be required for this Project.</p>