

SUPPLEMENTAL ENVIRONMENTAL INFORMATION REQUEST

GENERAL QUESTIONS

- 1. Provide the following items noted in the Resource Reports as outstanding information:**
 - a. Updated analysis, including existing conditions, construction- and operation-related impacts, and mitigation measures (as applicable), in the appropriate Resource Report(s) for the Chesapeake Energy Marketing, Inc. (Chesapeake) receipt meters;**
 - b. Updated correspondence and consultation records, including:**
 - i. Permit applications and authorizations received (Appendix 1B, Table 1B-6);**
 - ii. Written landowner agreements for residences within 10 feet of construction work areas (Appendices 8A, 8B, and 8D);**
 - c. Copies of all geotechnical investigations for horizontal directional drill (HDD) crossings; and**
 - d. A table identifying all outstanding plans ETC Tiger has committed to provide, when they will be filed, and the anticipated approval date.**

Response:

- a. Updated analysis, including existing conditions, construction- and operation-related impacts, and mitigation measures (as applicable), in the appropriate Resource Report(s) for the Chesapeake Energy Marketing, Inc. (Chesapeake) receipt meters;**

ETC Tiger Pipeline, LLC (ETC Tiger) has finalized the locations of the two Chesapeake receipt meters at approximate milepost (MP) 24.9 and MP 39.7. Biological and cultural surveys have been completed at both sites. The site at MP 24.9 is located on a mostly forested 2.8-acre site adjacent to other natural gas pipelines and associated facilities. Two ephemeral streams (CRK F27 and CRK F25) are located along the west side of the site but will not be affected by station facilities. No wetlands or cultural resources were found. The site at MP 39.7 is located on a 3.0-acre site in an area dominated by pine plantation and gas wells. No streams, wetlands, or cultural resources were found on this site. An addendum survey report documenting the biological and cultural surveys will be submitted on October 28, 2009 to FERC as well as the applicable resource agencies.

Enclosed in Attachment 1 to this data response are the following updated tables that incorporate the environmental information for each of these stations:

Table 1.3-3 “Revised” – Bi-Directional, Receipt, and Delivery Meters
Table 1.4-1 “Revised” – Summary of Land Requirements
Table 7A-2 “Revised” – Soil Associations and Limitations Affected within Lands to be Acquired for the ETC Tiger Pipeline Aboveground Facilities
Table 8A-2 “Revised” – Land Use affected by Construction and Operation of the Tiger Pipeline Project
Table 1 “Revised” – Residences within 1.5 miles of the Meter Station Sites (original table filed on September 16, 2009).

Enclosed in Attachment 2 to this data response are the following drawings for each site:

Revised USGS quad map
Revised alignment sheet
Comparison drawing showing the addition of the receipt meter site
Meter Station plot plan showing the station facilities and electric power interconnects
Aerial showing the location of residences within 1.5 mile of each site

Enclosed in Attachment 3 to this data response are the following updated figures:

Figure 1.3-1 – General Location Map of the Tiger Pipeline Project (October 2009)
Figure 1A-2 – USGS Excerpt Maps, Sheets 7 and 11

b. Updated correspondence and consultation records, including: i) Permit applications and authorizations received (Appendix 1B, Table 1B-6); and ii) Written landowner agreements for residences within 10 feet of construction work areas (Appendices 8A, 8B, and 8D);

No new permit applications have been submitted to federal or state agencies since ETC Tiger submitted its application to FERC pursuant to Section 7(c) of the Natural Gas Act on August 31, 2009. However, ETC Tiger has received concurrences on survey reports, and a permit for the Carthage Compressor Station and draft permits for the Cannisnia, Bienville, and Chatham Compressor Stations as provided in the updated tables and attached documentation listed below.

Enclosed in Attachment 1 to this data response are the following updated tables:

Table 1B-6 “Revised” – Applicable Permits, Approvals and Consultations
Table 1F-1 “Revised” – Complete Correspondence Listing

Enclosed in Attachment 4 to this data response are the following documents:

September 29, 2009, National Park Service (regarding Sabine River crossing) – Concurrence Telecon

September 10, 2009, Texas Commission on Environmental Quality – Carthage Compressor Station, Standard Permit Registration Number 90187
September 14, 2009: U.S. Fish and Wildlife Service, Arlington, TX – Concurrence Letter
October 1, 2009, Texas Historical Commission – Concurrence Letter
August 26, 2009, Louisiana Department of Environmental Quality - Permit No. 2420-00109-V0, Cannisnia Compressor Station (LA)
August 26, 2009, Louisiana Department of Environmental Quality – Permit No. 0360-00753-V0, Bienville Compressor Station (LA)
August 26, 2009, Louisiana Department of Environmental Quality - Permit No. 1300-00478-00, Chatham Compressor Station (LA)
October 12, 2009, Department of Culture, Recreation & Tourism, Office of Cultural Development, Division of Archaeology – Concurrence Letter

Enclosed in Attachment 5 to this data response (marked “Privileged and Confidential”) are the following landowner agreements:

Easement for TH-BI-509.000 (MP 62.7)
Easement for TH-RI-974.000 (MP 152.1)
Easement for TH-RI-962.000 (MP 163.8)

c. Copies of all geotechnical investigations for horizontal directional drill (HDD) crossings; and

Geotechnical investigations for the HDD crossings are currently underway and field investigations have been completed at 37 of 49 sites associated with the 22 proposed HDD locations, the alternate HDD at Socagee Creek (MP 12.8), and the alternate HDD plan involving the additional central HDD at Saline Bayou (MP 82.9). Analyses and reports on the completed sites are still pending. As stated in its application, ETC Tiger will submit the results of these investigations when completed or by December 2009.

d. A table identifying all outstanding plans ETC Tiger has committed to provide, when they will be filed, and the anticipated approval date.

ETC Tiger has made minor workspace adjustments to its site-specific structure and residential drawings to minimize impacts on these buildings and/or associated landscaping or other structures. The most significant of these involves reduced workspace for the residence at MP 112.9 and updated drawings are provided as listed below. See response to Data Request Nos. 20, 21, and 22. All workspace modifications are too small to quantify and the associated acreage tables do not require revision.

In addition, ETC Tiger will incorporate the HDD at Flat Creek (MP 117.5) as its preferred crossing method. This revision affects a number of tables, including those reporting acre impacts.

Enclosed in Attachment 1 to this data response are the following updated tables that incorporate the revised crossing method at Flat Creek and associated impact analysis:

- Table 1.4-1 “Revised” – Summary of Land Requirements
- Table 1.6-2 “Revised” – Alternate HDD Crossing Plans
- Table 1B-2 “Revised” – Additional Temporary Workspace
- Table 1B-5 “Revised” – Horizontal Directional Drill Locations
- Table 2.2-2 “Revised” – Summary of Wetland Impacts for the Tiger Pipeline Project
- Table 2A-1 “Revised” – Streams Crossed by the Tiger Pipeline Project
- Table 2A-4 “Revised” – ATWS Within 50 Feet of Wetlands and/or Waterbodies
- Table 2A-5 “Revised” – Wetlands Crossed by the Tiger Pipeline Project
- Table 8A-2 “Revised” – Land Use Affected by Construction and Operation of the Tiger Pipeline Project

Enclosed in Attachment 2 to this data response are the following updated drawings for the revised workspace located at the residence at MP 112.9 and the revised crossing method at Flat Creek:

- Alignment Sheets
- Comparison drawing showing the revisions

The only outstanding plan that remains to be filed is the Draft Wetland Mitigation Plan for the Tiger Pipeline Project. ETC Tiger is currently working with the U.S. Army Corps of Engineers (USACE), Fort Worth, TX and Vicksburg, MS Districts, to finalize mitigation measures and requirements, and obtain credits from appropriate mitigation banks. ETC Tiger anticipates submitting the Draft Mitigation Plan in December 2009 as listed in the table below.

Outstanding Plans	
Plan	Anticipated Filing Date
Draft Wetland Mitigation Plan	December 2009

2. Clarify whether ETC Tiger's proposed *instream construction* timeframes are as follows:
- a. 24 hours for minor (≤ 10 feet wide at water's edge at the time of construction) *perennial* waterbodies;
 - b. 48 hours for intermediate (>10 feet but ≤ 100 feet wide at water's edge at the time of construction) *perennial* waterbodies; and
 - c. 48 hours for minor and intermediate *ephemeral* or *intermittent* waterbodies.

If so, ensure that all project documents clearly and accurately reflect ETC Tiger's proposed in-stream construction windows and subsequent 24-hour restoration window. Representative examples where the language is confusing include:

- d. pg. 1-26: Text indicates that "...the duration of construction across perennial waterbodies will be limited to 48 hours (24 hours to cross the waterbody and 24 hours for restoration) across minor waterbodies (10 feet wide or less) and intermediate waterbodies (between 10 and 100 feet wide).";
- e. Appendix 1E, ETC Tiger's Procedures, pg. 15: Text indicates that "...minor waterbodies may be crossed using the open-cut crossing method, with the following restrictions: a) except for rock breaking measures, complete instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) within 48 hours. Except for rock breaking measures, complete instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) within 24 hours for all perennial waterbodies"; and
- f. pg. 2-14: Text indicates that "...the duration of construction will be limited to 48 hours across minor and intermediate waterbody crossings, with the exception of trenching for intermittent and ephemeral streams..."

Response:

The statements in 2.a. through 2.c. are correct.

With respect to 2.d. through 2.f., the revised paragraphs provided below contain the required revisions with deletions shown in ~~striketrough~~ text and additions in red text/underline. Additional sentences, shown in red text/underline, are also provided to clarify the discussion where appropriate.

Resource Report 1, Section 1.6.1.3, Waterbody Construction Procedures (pg. 1-26):

"ETC Tiger will follow its Procedures to limit water quality and aquatic resource impacts during and following construction. Construction activities will be scheduled so that the

pipeline trench is excavated as close to pipe laying activities as possible. In accordance with ETC Tiger's Procedures and where the pipeline will not be installed using HDD, the duration of construction across perennial waterbodies will be limited to 48 24 hours (~~24 hours to cross the waterbody and 24 hours for restoration~~) for instream work across minor perennial waterbodies (10 feet wide or less) and 48 hours across for instream work intermediate perennial waterbodies (between 10 and 100 feet wide). See additional discussion in Resource Report 2, Section 2.1. Banks will be returned to as near to pre-construction conditions as possible within 24 hours of completion of each open-cut crossing. Any deviations in timing that would result in extended crossing durations will be identified in advance by ETC Tiger and notification made to FERC with site-specific justification."

Appendix 1E, ETC Tiger's Procedures, Section V.B.7.a., Crossings of Minor Waterbodies (pg. 15):

"Except for rock breaking measures, complete instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) within 48 hours for all intermittent or ephemeral streams. Except for rock breaking measures, complete instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) within 24 hours for all perennial waterbodies. Streambanks and unconsolidated streambeds may require additional restoration after this period."

Enclosed in Attachment 4 to this data response are the updated ETC Tiger Wetland and Waterbody Construction and Mitigation Procedures, October 2009 (Procedures).

Resource Report 2, Section 2.1.5., Waterbody Crossing Methods (pg. 2-14):

"ETC Tiger will follow its Procedures to limit water quality and aquatic resource impacts during and following construction. Construction activities will be scheduled so that the pipeline trench is excavated as close to pipe laying activities as possible. Instream construction across minor perennial streams will be completed within 24 hours. In accordance with ETC Tiger Procedures, the duration of instream construction will be limited to 48 hours across minor intermittent and ephemeral streams and intermediate waterbody crossings, ~~with the exception of trenching for intermittent and ephemeral streams~~ as described the ETC Tiger Procedures. ..."

3. Address the comments of Mr. Barron O'Neal filed on September 15, 2009.

Response:

ETC Tiger is proposing to use a construction right-of-way width that will provide for safe working conditions and efficient pipe installation for large 42-inch-diameter pipe, while also protecting sensitive environmental resources.

Generally, the ETC Tiger Pipeline will be placed approximately 60 feet from the centerline of a foreign pipeline. In this regard, the permanent easements for the ETC Tiger Pipeline and foreign pipeline will abut each other. Approximately 20 feet of the permanent easement for the foreign pipeline will be used for temporary construction right-of-way for the ETC Tiger Pipeline. Up to 40 feet of the area previously disturbed for installation of the CenterPoint or Gulf South pipelines will be used as part of the permanent easement or temporary work space for the ETC Tiger Pipeline.

In the case of Mr. O'Neal's properties (TH-PA-140.000 and TH-CA-200.000), the proposed right-of-way includes 60 feet of permanent easement, which will abut the existing CenterPoint easement, 65 feet of temporary workspace, and isolated areas of 25 feet of additional temporary workspace. In wetland areas on the tracts, the construction right-of-way has been reduced to 100 feet in width. This workspace configuration includes up to 20 feet of the abutting pipeline's permanent easement, in some areas up to 40 feet of the previous construction workspace and between 40 and 105 feet of new workspace not previously disturbed by prior construction (actual configuration varies depending upon the previous pipeline's workspace orientation compared to ETC Tiger's workspace). The Project will typically result in 40 to 105 feet of new impacts to Mr. O'Neal's property.

Specific to Mr. O'Neal's September 15, 2009 letter, ETC Tiger is proposing abutting easements. Industry standard practices are to abut permanent easements and not overlap the permanent easements for safety and pipeline integrity considerations. For large diameter pipelines (both pipes are 42 inches in diameter), adequate spacing is required to ensure the parallel pipeline is not impacted during construction, either by downward pressure from the heavy equipment or lateral movement which could result in the existing utility shifting towards the disturbed soil or new pipeline, compromising the existing pipeline's operations. Additionally, each operating company has individual easements that have company-landowner specific terms and conditions. Although these easement agreements may be similar for the parallel pipelines, they are often not consistent on material aspects. Therefore, unless both parallel pipelines, which in this case are owned by two different pipeline companies, are installed at the same time and have a joint use, construction and operating agreement, it is impractical for a host of reasons, including safety and maintenance considerations, for the two pipelines to share a permanent easement once one or both lines are in service.

Similar to construction, during operation of a pipeline, adequate space between the parallel pipelines is necessary to safely operate and maintain the pipelines should excavation be required during operations. Adequate spacing between pipelines is also necessary to prevent cross-

contamination of the cathodic protection of the pipelines. To share a common easement and place the pipelines closer to each other than currently proposed, the cathodic protection systems must be designed in parallel. Alternatively, one company must provide the protection for both pipes when they are in close proximity or an operating agreement must be established that contemplates and mitigates for each pipeline's individual integrity plan, which again is impractical. In this case, there is no common use or operating agreement given that the two pipelines are competitors. Therefore, it is impracticable for the pipes to be located within a common easement.

ETC Tiger has been in communication with Mr. O'Neal to further define the limits of the proposed pipeline permanent and construction rights-of-way. Based upon the current and previously proposed and filed configuration, ETC Tiger will overlap the existing easement by 20 feet, will utilize portion of the previous construction right-of-way up to 40 feet (for construction and as part of the ETC Tiger permanent easement) and will typically clear an additional 40 to 105 feet of new, previously undisturbed right-of-way. ETC Tiger is working with Mr. O'Neal to ensure he understands the workspace configuration and that the proposed pipeline will not impact the width of the land as represented in his letter.

ETC Tiger has been in contact with Mr. O'Neal and has made multiple attempts to secure the pipeline construction and permanent rights-of-way, with the latest communication occurring on October 12, 2009. ETC Tiger believes that a resolution is imminent and will include the rights-of-way as proposed by ETC Tiger. Furthermore, Mr. O'Neal will be compensated for any loss of trees on his tree farm due to either temporary or permanent impacts by the ETC Tiger Pipeline Project. Upon resolution, ETC Tiger will provide FERC a copy of the resolution or notification that the issues have been resolved.

RESOURCE REPORT 1 – GENERAL PROJECT DESCRIPTION

- 4. Plot plans filed for the compressor stations and meter stations do not provide clear mapping of the associated nonjurisdictional powerlines. Although some of the plot plans include a “utility easement”, it does not appear to be the same route as the nonjurisdictional powerlines described in Resource Report 1. Please provide clear mapping of all nonjurisdictional powerlines that would be constructed to provide electrical service at compressor and meter stations. In addition to the mapping, provide the following detailed information for each facility.**
- a. Federal permits required and their status;**
 - b. Status of local and state permits required; and**
 - c. Provide all of the remaining information required for nonjurisdictional facilities as outlined in 18 CFR 380.12(c)(2)(i).**

Response:

Enclosed in Attachment 2 to this data response are the following updated drawings for the compressor stations and receipt/delivery meters that show the electric power interconnects. The drawings provided in response to Data Request 1.a. contain the same information for the two Chesapeake receipt meters.

Aerial plot plans for the Carthage, Cannisnia, Bienville, and Chatham Compressor Stations

Aerial plot plans for the receipt and delivery meters

Plot plans for the receipt and delivery meters

Enclosed in Attachment 1 to this data response is the following updated table that incorporates the information provided in the updated plot plans:

Table 1.11-1 “Revised” – Non-Jurisdictional Facilities

The only nonjurisdictional facilities identified for the Tiger Pipeline Project are interconnects to provide electricity from the existing electric distribution system to the compressor stations, and receipt and delivery meters. Because these facilities only involve the installation of a limited number of distribution power poles and associated powerlines, the facilities will be constructed by the electric power companies under their respective state blanket authorizations to provide interconnect service. ETC Tiger is unaware of any separate federal, state or local permits that will be required and has not been notified by the electric providers to date of any project specific requirements. These blanket authorizations identify any necessary federal and state permitting requirements that may be required to provide electric power, and are the responsibility of the service provider and fall under their authority as a power provided in their respective service region.

The following information is provided in response to 18CFR380.12(c)(2)(i):

A) A brief description of each facility, including as appropriate: Ownership, land requirements, gas consumption, megawatt size, construction status, and an update of the latest status of Federal, state, and local permits/approvals;

No new or expanded power generation facility(ies) will be required to provide electric service to the compressor and meter stations. The only facilities required are the addition of poles and powerlines from the existing power distribution system to the compressor and meter station sites as shown on the attached drawings and listed in revised Table 1.11-1. Therefore, the remaining requirements in 18CFR380.12(c)(2)(i)(A) are not applicable to the nonjurisdictional facilities for the Tiger Pipeline Project (Project).

(B) The length and diameter of any interconnecting pipeline;

ETC Tiger has not identified any nonjurisdictional pipeline(s) associated with the Project. Therefore, this requirement is not applicable for the Tiger Pipeline Project.

(C) Current 1:24,000/1:25,000 scale topographic maps showing the location of the facilities;

Maps showing the location of the electric power interconnects are provided in Attachment 2 to this data request.

(D) Correspondence with the appropriate State Historic Preservation Officer (SHPO) or duly authorized Tribal Historic Preservation Officer (THPO) for tribal lands regarding whether properties eligible for listing on the National Register of Historic Places (NRHP) would be affected;

The electric power interconnects will be constructed and operated in accordance with the electric power company's blanket authority with respect to cultural resources. ETC Tiger is unaware of any additional requirements and has not been notified by the electric providers to date of any project specific requirements.

(E) Correspondence with the U.S. Fish and Wildlife Service (and National Marine Fisheries Service, if appropriate) regarding potential impacts of the proposed facility on federally listed threatened and endangered species; and

The electric power interconnects will be constructed and operated in accordance with the electric power company's blanket authority with respect to threatened and endangered species. ETC Tiger is unaware of any additional requirements and has not been notified by the electric providers to date of any project specific requirements.

The Project is not located within any area under the jurisdiction of the National Marine Fisheries Service.

(F) For facilities within a designated coastal zone management area, a consistency determination or evidence that the owner has requested a consistency determination from the state's coastal zone management program.

This requirement is not applicable to the Tiger Pipeline Project because no facilities are located within a designated coastal zone management area.

5. Indicate whether ETC Tiger plans to discharge hydrostatic test water directly to any waterbodies (pg. 1-24).

Response:

ETC Tiger will not discharge hydrostatic test water directly into any waterbodies.

6. Resolve the following issues or inconsistencies in Table 1B-3:

- a. Proposed permanent access roads TH-RR-410.5-PAR 3AA (milepost (MP) 49.21) and TH-BI-512-PAR-5 (MP 63.4) do not appear on the alignment sheets; and**
- b. Provide information for access roads TH-BI-557-PAR-7 (MP 77.05), TH-OU-800-TAR-42 (MP 123.21), and TH-OU-824-TAR-28 (MP 139.19).**

Response:

Enclosed in Attachment 2 to this data response are the following drawings that include permanent access roads TH-RR-410.5-PAR-3AA (MP 49.21) and TH-BI-512-PAR-5 (MP 63.4). Also provided are revised drawings that show the complete length of the permanent access road TH-BI-557-PAR-7 (MP 77.05).

USGS quad maps
Alignment sheets

Enclosed in Attachment 1 to this data response are the following updated tables that incorporate information on Access Road TH-BI-557-PAR-7 (MP 77.0):

Table 1B-3 “Revised” – Temporary and Permanent Access Roads
Table 1.4-1 “Revised” – Summary of Land Requirements
Table 8A-2 “Revised” – Land Use Affected by Construction and Operation of the Tiger Pipeline Project (acres)

Enclosed in Attachment 3 to this data response are the following updated USGS map excerpts:

Figure 1A-2 –USGS Excerpt Maps, Sheets 13, 16, and 20

Information on the remaining two access roads (TH-OU-800-TAR-42 at MP 123.21, and TH-OU-824-TAR-28 at MP 139.19) has already been provided in Table 1B-3 that was filed with ETC Tiger’s application. Both of these access roads cross the right-of-way in two locations: Access Road TH-OU-800-TAR-42 at MPs 122.4 and 123.15, and TH-OU-824-TAR-28 at MPs 138.65 and 139.19. The information provided in Table 1B-3 at the first MP crossing of each access road includes the entire length of the access road.

- 7. Resolve the following issues or inconsistencies in Table 1B-5 and the HDD plans (Appendix 1A-1):**
- a. The access paths through forested areas identified in Table 1B-5 do not match the HDD plans for the Sabine River (P4-1), Bayou Pierre (P4-3), Prairie River (P4-4), Red River (P4-6), Boeuf River (P4-18), and Bee Bayou (P4-19).**
 - b. Provide justification for the 15' x 730' water access road if the Sabine River is not a proposed hydrostatic test water source (P4-1);**
 - c. Provide site-specific justification for requesting greater than a 6-foot-wide access path through forested areas where access would only be needed for placement of the telemetry cables (i.e., the resource being crossed is not proposed for use as a hydrostatic test water resource). Representative examples include:**
 - i. Sabine River (P4-1);**
 - ii. I-49 (P4-2);**
 - iii. Prairie River (P4-4);**
 - iv. State Highway 9 (P4-10).**
 - d. For those areas where a 15-foot-wide access path through a forested wetland is proposed, evaluate the use of a 10-foot-wide access path or provide site-specific justification for the wider access path. Representative examples include:**
 - i. Ash Bayou and Powell Bayou (P4-5);**
 - ii. Loggy Bayou (P4-7); and**
 - iii. Dugdemona River (P4-12).**

Response:

- a. The access paths through forested areas identified in Table 1B-5 do not match the HDD plans for the Sabine River (P4-1), Bayou Pierre (P4-3), Prairie River (P4-4), Red River (P4-6), Boeuf River (P4-18), and Bee Bayou (P4-19).**

Enclosed in Attachment 1 to this data response is the following updated table that lists the lengths and widths of the access paths through forested areas. The table also incorporates elimination of the access path at the Sabine River (see response to Data Request 7.b.) and reduced widths for access paths at other HDD locations (see response to Data Request 7.c. and 7.d.).

Table 1B-5 “Revised” – Horizontal Directional Drill Locations

Enclosed in Attachment 2 to this data response are the revised alignment sheets and site-specific HDD drawings showing these revised access path widths at the following HDDs:

Sabine River (MP 5.26)
Interstate 49 (MP 35.7)
Bayou Pierre (MP 42.69)
Prairie River (MP 46.7)
Ash Bayou and Powell Bayou (MP 50.29)
Red River (MP 51.54)
Loggy Bayou (MP 54.45)
Toulon Bayou (MP 56.26)
State Highway 9 (MP 81.66)
Dugdemona Bayou (MP 96.32)
Willow Creek (MP 100.82)
State Highway 34 and wetland (MP 114.76)
Ouachita River (MP 135.75)
Bayou Lafourche and Diversion Channel (MP 140.38)
Steep Bayou (MP 145.81)
Boeuf River (MP 147.13)
Bee Bayou (MP 155.72)
Siphon Creek (MP 164.99)
Big Creek (MP 165.81)

No revisions were required for the HDDs at Black Lake Bayou (MP 67.75) or at Saline Bayou (MP 82.45). The alignment sheets and site-specific HDD drawing for Flat Creek (MP 117.45) is included in response to Data Request No. 1.d.

b. Provide justification for the 15' x 730' water access road if the Sabine River is not a proposed hydrostatic test water source (P4-1);

The access road has been removed. See revised drawing provided in response to Data Request 7.a.

c. Provide site-specific justification for requesting greater than a 6-foot-wide access path through forested areas where access would only be needed for placement of the telemetry cables (i.e., the resource being crossed is not proposed for use as a hydrostatic test water resource). Representative examples include: i) Sabine River (P4-1); ii) I-49 (P4-2); iii) Prairie River (P4-4); iv) State Highway 9 (P4-10).

ETC Tiger has reduced access paths for telemetry cables to 6 feet through forested areas where no access is required to the waterbody for hydrostatic testing. See drawings provided in response to Data Request 7.a.

- d. For those areas where a 15-foot-wide access path through a forested wetland is proposed, evaluate the use of a 10-foot-wide access path or provide site-specific justification for the wider access path. Representative examples include: i) Ash Bayou and Powell Bayou (P4-5); ii) Loggy Bayou (P4-7); and iii) Dugdemona River (P4-12).**

ETC Tiger has reduced access paths through forested wetlands to 10 feet. See drawings provided in response to Data Request 7.a.

- 8. Resolve the following issues or inconsistencies in Appendix 1D, Table 4:**
- a. Describe or provide an example illustrating the statements that “ETC Tiger will overlap the existing right-of-way for up to 20 feet and utilize the previously impacted/cleared right-of-way for up to 40 feet.”**
 - b. The justification indicates that the proposed construction right-of-way will overlap an existing right-of-way, but the alignment sheets do not consistently support this justification. Representative examples include:**
 - i. MP 3.16 to MP 3.32;**
 - ii. MP 38.18 to MP 38.28; and**
 - iii. MP 49.23 to MP 49.98.**

Response:

- a. Describe or provide an example illustrating the statements that “ETC Tiger will overlap the existing right-of-way for up to 20 feet and utilize the previously impacted/cleared right-of-way for up to 40 feet.”**

Enclosed in Attachment 3 is Figure 1B “Revised” – Typical Upland Workspace Construction Area Paralleling a Foreign Pipeline (125 feet) – depicting the proposed overlap of the adjacent pipeline rights-of-way. The figure depicts the general configuration of the proposed right-of-way adjacent to either the Gulf South or CenterPoint pipelines since ETC Tiger parallels these pipelines for the majority of the route. Based upon information gathered for both parallel pipelines and field surveys and observations, ETC Tiger has depicted in Figure 1B “Revised” that the parallel pipelines have a 60 foot permanent easement. Additionally, Figure 1B “Revised” assumed that the parallel pipelines typically utilized 30 feet of workspace on their non-working side of the right-of-way and 70 feet on the working side during construction. The dimensions do not reflect portions of the parallel pipelines’ expanded sections of right-of-way where they utilized more than 100 feet or previously cleared additional temporary workspace or where the previous construction workspace is opposite from the proposed ETC Tiger workspace or working side of the right-of-way. Therefore, of the assumed 70 feet of previously impacted parallel pipeline permanent and temporary construction rights-of-way, the overlap of the parallel pipeline’s permanent easement that ETC Tiger is proposing to utilize is 20 feet, with 10-foot separation between ETC Tiger’s proposed workspace and the foreign pipeline’s centerline. For the remaining portion of the previously cleared 70 feet, a maximum of 40 feet was assumed to be previously utilized for temporary construction workspace, which based upon ETC Tiger’s proposed configuration will become part of ETC Tiger’s permanent pipeline right-of-way. In areas where a larger footprint was utilized for construction by the parallel pipelines, the actual overlap of rights-of-way for construction of the ETC Tiger pipeline will be greater than 40 feet. However, these areas are not consistent and were not taken into account and are not represented

in the attached figure, even though they would represent a further reduction in new undisturbed work space for the pipeline construction.

- b. The justification indicates that the proposed construction right-of-way will overlap an existing right-of-way, but the alignment sheets do not consistently support this justification. Representative examples include: i) MP 3.16 to MP 3.32; ii) MP 38.18 to MP 38.28; and iii) MP 49.23 to MP 49.98.**

Generally, the proposed ETC Tiger Pipeline route is offset, parallel to and/or abuts an existing pipeline, utility or other parallel facility for approximately 93 percent of the proposed route. In certain areas where the proposed ETC Tiger Pipeline is not proposed to be located immediately adjacent to or abutting the foreign utility easement, ETC Tiger maintained as minimal an offset as possible so as to remain parallel to, but not necessarily adjacent to or abutting, the foreign utility. In all cases where a minor deviation occurred from the abutting utility, ETC Tiger sited its pipeline in a manner that directed the route back to the abutting pipeline as soon as practicable in order to remain immediately adjacent to or abutting the foreign pipeline.

In areas where a small deviation occurred that was within a similar habitat type as the parallel or abutting right-of-way, ETC Tiger either utilized a portion of the previously disturbed area or sited its pipeline immediately adjacent to the previously disturbed area. ETC Tiger did not specifically segment out these areas in Appendix 1D, Table 4, as the site-specific justification provided therein was nonetheless accurate and applicable. As noted in Appendix 1D, Section 3.0, page 12, ETC Tiger is proposing to utilize a portion of the foreign pipeline or utility's previous construction or operational footprint, but may not overlap the entire 20 feet of permanent easement or 40 feet of temporary workspace. ETC Tiger used the term "up to" so as to indicate that the overlap would occur up to the widths provided, but was not intended to represent exactly 20 or 40 feet. Therefore, in the site-specific information/justification column in Table 4 of Appendix 1D, and in the text in Section 3.0 of Appendix 1D, ETC Tiger has provided the site-specific justification and has indicated that a portion of the permanent easement and previous construction right-of-way will be utilized "up to" the 20 or 40 feet represented, but in no case will the proposed pipeline be closer than 10 feet from the foreign utility. The dimension of the overlap will be dependent upon the amount or width of the previously cleared or disturbed right-of-way utilized by the foreign utility and the orientation of the parallel pipeline's right-of-way or location of their working versus nonworking side of the right-of-way. ETC Tiger will use as much of the previous utility construction or permanent easements as possible while still maintaining the 10 foot set-back to protect the existing utility.

In areas where major offsets occurred and there were significant differences in the habitat type, ETC Tiger did provide site-specific justification for the proposed right-of-way configurations. Specifically, Appendix 1B, Table 1B-1 provides a list of the parallel or abutting rights-of-way and details the length of the new or abutting right-of-way, measured offset and length of pipe where an offset occurs as opposed to abutting easements, as well as the reason why an offset or deviation from the abutting right-of-way occurs. ETC Tiger is committed to utilizing as much of the previously disturbed area as possible and has sited its route and workspace to overlap foreign utilities as much as possible where feasible.

In all instances where the pipeline abuts a foreign utility and the working die of the previous pipeline can be overlapped by ETC Tiger, ETC Tiger is proposing to utilize up to the 20 and 40 feet of overlapping right-of-way (although the width may vary as mentioned above). Where there is a slight offset from the foreign utility, ETC Tiger will either utilize a portion of the previously disturbed right-of-way or will run parallel to, but will not abut the foreign utility. In these cases, the most common reasons for an offset include:

- 1) The abutting pipeline ran up to and adjacent to a property boundary where ETC Tiger had to offset the route slightly to maintain the property fence line or not encumber the abutting landowner with a small portion of the ETC Tiger Pipeline easement on its property (typically the permanent easement – ETC Tiger examined all the property plats and boundaries and where possible, eliminated partial overlaps to avoid splitting the right-of-way and overly encumbering a landowner for either only temporary use of its property or a portion of the permanent easement). This slight offset prevented the ETC Tiger Pipeline permanent easement (and in some instances the temporary easement) from being segmented which would complicate construction and ownership commitments or result in long term operational constraints for maintaining the pipeline once in operations.
- 2) A structure occurs along the route where ETC Tiger had to offset and move around the structure to avoid impacts. Examples of these structures include barns, well pads, foreign pipeline valve settings, compressor stations or meter stations.
- 3) Physical land features such as parallel stream crossings or side-slope topography where the previous utility placed its utility in a position where it is impossible to install the ETC Tiger Pipeline parallel to the foreign utility without causing significant disturbance to the land feature.

In the three above-mentioned examples provided in question 8.b. i, ii and iii, the following information details the site-specific conditions where ETC Tiger may deviate slightly and not necessarily abut the parallel easement.

- MP 3.16 to MP 3.32 – With respect to this short section of its proposed route, ETC Tiger has been in communication with Sabine Valley Pipeline (“Sabine Valley”) which is proposing a pipeline in this area that will be located adjacent to two existing small diameter pipelines owned and operated by El Paso Energy Company. These existing and proposed pipelines are located within the same right-of-way that ETC Tiger proposes to parallel. Based upon communications with Sabine Valley, and as confirmed through a review of the easements recorded in the local Parish courthouse, ETC Tiger is aware that Sabine Valley has immediate plans to construct an 8-inch diameter pipeline in the areas immediately east of the existing eastern most located El Paso pipeline. Therefore, ETC Tiger shifted its proposed pipeline route further to the east to avoid this proposed pipeline. During construction, ETC Tiger will utilize “up to” 20 feet of Sabine Valley’s permanent easement and “up to” 40 feet of its construction footprint or as much of the

previously disturbed areas as possible without encroaching on more than 10 feet of Sabine Valley's pipeline centerline. ETC Tiger has shifted its permanent easement to abut the Sabine Valley permanent easement (as filed). ETC Tiger is committed to utilizing as much of the Sabine Valley construction and operational corridor as possible during construction.

- MP 38.18 to MP 38.28 – Within this section of its proposed route, ETC Tiger shifted the pipeline north of the existing and parallel pipeline corridor. This shift was the result of an identified stream that occurs between the proposed Tiger Pipeline and the foreign utility. Although not indicated on the alignment sheets, a creek that is tied to Wet L1 runs parallel to the foreign utility. If ETC Tiger were to parallel the foreign utility in this section, the proposed pipeline would fall within and/or would run parallel to the stream for approximately 400 linear feet. In this area, ETC Tiger will not utilize a portion of the existing easements, but rather, is proposing a 120-foot construction right-of-way to accommodate the multiple stream and wetland crossings.
- MP 49.23 to MP 49.98. In this section, the Tiger Pipeline parallels and abuts the foreign utility from approximate MP 49.23 to 49.49 and the site-specific information provided in Table 4 is valid. However, from MP 49.49 to MP 49.98, the pipeline has been shifted approximately 25 feet to the north and is not immediately abutting the foreign pipeline. The shift north was made to prevent the pipeline centerline from running down a property line and associated fence line, in accommodation to the landowner. If ETC Tiger installed the pipe utilizing the standard configuration of 60 feet between the foreign pipeline centerline and the Tiger Pipeline centerline, the Tiger Pipeline would fall either beneath or immediately inside the northern property owner's property. This would result in ETC Tiger having to relocate the landowner's fence line to avoid impacts to the Tiger Pipeline. (Relocation of the fence posts would be necessary to avoid the fence posts from being re-installed on-top of the Tiger Pipeline). In an effort to reduce impacts and to not unduly encumber the landowner's property and fence line location, ETC Tiger moved the entire construction corridor to the north off of the southern landowner's property. This shift avoids having to remove the fence between the properties and results in a temporary disturbance to one landowner as opposed to two landowners. Moreover this is consistent with the expressed requests of the landowners.

Based upon the previous foreign utility construction, ETC Tiger will utilize a portion of the previously disturbed pipeline construction footprint (the "40 feet"), but will not utilize the standard 20 feet of the foreign pipeline's permanent easement. The site-specific justification in Table 4, Appendix 1D is valid in terms of the community type and impacts. In this regard, the land to the north is a combination of pasture and previously clear-cut timber.

- 9. File a table that identifies the location (MP), extent (acreage), and site-specific justification for each area where ETC Tiger believes that a right-of-way width greater than 75 feet wide would be required in wetlands due to site-specific circumstances. For each of these areas, indicate the amount of forested vegetation that would be cleared for construction.**

Response:

Enclosed in Attachment 1 to this data response is the following table that identifies the MP location, extent (acreage), and site-specific justification for each area where ETC Tiger is requesting a right-of-way width greater than 75 feet.

Table DR-9 – Site-Specific Information for Wetland Crossings Where Rights-of-Way are Greater than 75 feet

For all the locations where ETC Tiger is proposing an expanded right-of-way (ROW) in wetlands from 75 feet to either 100 or 120 feet, the bulleted information below is generally applicable. In Table DR-9 (see Attachment 1), ETC Tiger has provided additional site-specific information on an MP basis. ETC Tiger is only proposing a wider ROW in areas where it is necessary to have an expanded ROW to minimize extended durations of impacts to the wetland resources, which will ultimately lead to reduced impacts to the community and will allow for more successful restoration. In all of the mature, old growth forested wetlands which are located adjacent to major or sensitive river/stream crossings and in areas where cypress-tupelo habitat is found, ETC Tiger has either reduced the ROW to 75 feet or is proposing to cross the habitat via an HDD. These crossings are either short in length (less than 500 feet) allowing drag construction techniques or the conditions are suitable for an HDD or the area is sensitive in nature and an HDD will prevent significant impacts to the resource.

When installing a pipeline in drag sections, the pipeline is welded in long sections outside the wetland area and a portion of the trench spoil is carried outside the wetland boundary temporarily while construction is underway. This process and technique allows more of the ROW to be utilized for access and equipment. Once the trench is dug and the work area is graded to allow the equipment to travel into/out of the wetland, the pipe is then carried into the wetland and placed into the trench. Immediately following the pipe placement, the pipe weights are installed and then the trench is back-filled with the spoil stored within the ROW or it is carried back into the wetland from the storage area. This technique can be employed in situations where the crossing is less than 500 linear feet. However, if the wetland is greater than 500 linear feet, the pipe drag section becomes too long and cannot be carried into the wetland due to weight limitations and typically the equipment does not have enough strength to drag and carry the pipe at the same time. The weight of the pipe coupled with the weight of the equipment is limited by the soil having enough weight-bearing capacity to handle the combined weight of the pipe and equipment, even with the use of wood mats and low weight bearing equipment.

Additionally, by preparing for and proposing a larger footprint upfront during the planning process, ETC Tiger believes that the construction duration can be reduced, thus reducing the

duration of construction within the wetland and allowing for quicker restoration. Approval of a larger ROW in the Certificate Order also will reduce the number of post-certificate variance requests, increasing the accuracy of the wetland impacts associated with the project as reflected in the Environmental Assessment prepared by the Commission Staff. Early and accurate reporting of the required workspace also significantly reduces the amount of additional temporary workspaces typically associated with wetland crossings. Last, by proposing the required workspace upfront during the review process, ETC Tiger can prepare accurate construction documents as well as accurate construction contractor bid preparation to manage and preserve the project economics (and thus the costs borne by shippers) as well as develop an accurate and consistent construction plan. In general an expanded ROW in certain wetlands will minimize the environmental risk, reduce the duration of impacts, and will allow for efficient construction of this pipeline.

The following bulleted information is consistent and applicable to all locations where ETC Tiger is proposing the use of an expanded ROW:

- Typical construction layout drawings Figure 2B-1 (Sheets 1 through 5) to and Figure 2C-1 (Sheets 1 through 6) (see Attachment 3 to this data request) provide to scale drawings of the proposed construction within the 100 and 120 foot expanded ROW sections. These drawings demonstrate the overlap of the abutting and previous construction/permanent utilized areas as well as the new ROW required to install the proposed pipeline.
- Overall, in wetlands where a ROW is proposed that exceeds 75 feet in width, ETC Tiger is proposing to utilize the parallel, previously cleared utility ROW as much as possible. In most areas (where a utility is parallel to the proposed pipeline and the parallel pipeline's workspace falls on the same side as the ETC Tiger proposed pipeline workspace), this translates into ETC Tiger overlapping the existing foreign pipeline permanent ROW for up to 20 feet. ETC Tiger also will utilize the previously impacted/cleared construction ROW for up to 45 feet (assuming the previous pipeline had a 75 foot workspace on the working side of its ROW or less depending on had any associated additional temporary workspace). New ROW in areas not previously disturbed could be up to 65 feet in width (105 feet in areas where the previous pipeline workspace is opposite of the ETC Tiger proposed workspace), depending on the orientation and configuration of the previous abutting ROW. Where ETC Tiger abuts a parallel utility, ETC Tiger does not anticipate that the new additional wetland or tree clearing will exceed 75 feet, where a parallel utility and the associated previous workspace exists and no more than 105 feet where a previous utility workspace is not available to overlap. In non-forested wetlands, the same overlap and configurations are proposed. However, ETC Tiger is proposing to utilize up to 120 feet in these areas. The resulting new ROW for construction is not anticipated to exceed 75 feet in abutting areas not previously disturbed (in most instances, however it could also be up to 105 feet where a parallel utility's previous workspace is not available or opposite from the ETC Tiger proposed workspace). For areas where an abutting utility does not exist, ETC Tiger is proposing up to 100 feet in wetlands less than 500 linear feet, 120 feet in wetlands greater

than 500 linear feet, and 75 feet in wetlands that have cypress and tupelo trees present (at least within the portion of the wetland where the cypress and tupelo trees occur).

- To expedite construction and reduce the duration and impacts to the environment and landowners who have specifically requested a more expedited construction period than they experienced with the prior two pipelines, ETC Tiger requires a larger ROW within certain habitat types to ensure the contractors can move efficiently and safely along the ROW. Without adequate space, the contractors move at a slower pace, extend the duration of impacts and soil disturbance, and extend the exposure of safety hazards to the construction employees. Narrow workspaces increase congestion and ultimately result in higher accident and injury ratios. More efficient construction also will result in fewer impacts to the landowners and communities by reducing the duration of construction related traffic along the public and private roadways. Experience has shown that extending the construction of natural gas pipelines can lead to unintended environmental damage related to severe weather and increased probability of unplanned events (off-ROW disturbances, machinery related discharges, etc.).
- Landowner's have agreed in concept or have signed easement agreements for larger rights-of-way up to 125 feet plus the required ATWS. These commitments have been made with the expectation of more expedient construction to lessen the inconvenience and impacts to their property and lifestyle. For wetland areas, ETC Tiger is proposing a maximum of 100 to 120 feet where feasible, although the landowner's have agreed to allow up to 125 feet.
- In sensitive areas where the agencies have recommended a reduced ROW, ETC Tiger has met their requirements and has reduced the ROW where feasible. In addition to reductions in sensitive areas, ETC Tiger is proposing numerous HDDs to avoid impacts to major waterbodies, parallel stream areas where the route could not avoid the stream, and certain wetlands that the agencies have considered more sensitive. To further minimize the environmental impacts and overall footprint, although ETC Tiger will have a permanent easement across the HDDs, ETC Tiger has committed to the agencies that the area in-between the HDD entry and exit points will not be cleared during construction or operations. ETC Tiger believes that the combination of the ROW configurations coupled with the mitigation measures as proposed in the sensitive areas minimizes the impacts to environmental resources as much as possible while still facilitating a route and ROW that meets the project objectives.
- The majority of the land traversed where ETC Tiger is proposing a ROW configuration greater than 75 feet are locations where the cover type consists of non-forested wetlands, long wetland crossings where it is not feasible to reduce the ROW (to allow access into, across and out of the wetland with the least amount of passes possible; reduced width requires multiple wetland passes to support the various stages of pipeline construction and could be up to 10 passes for a single wetland), or young forested wetland habitat that has either been cleared by previous utility installation or other land uses.

- In areas where old growth timber or unfragmented forest exists (which is very limited along the proposed pipeline), ETC Tiger is proposing to utilize a 100-foot-wide or less ROW, depending on the presence of cypress and tupelo trees.
- A wider ROW will reduce the chances for safety-related incidents by reducing congested work conditions – 42-inch pipe requires a larger and deeper trench which takes up a larger proportion of the ROW than smaller diameter pipe. This increases the ditch width and depth and requires a larger ROW to store spoil material during stringing, welding, trenching, and laying operations.
- As part of the pipeline installation, pipe weights are required to be placed on top of the pipe to ensure the pipe remains buried during periods when the wetlands are saturated. The weights will be spaced at intervals of no more than eight feet and could be less based on the soil conditions of the wetland crossing. These weights extend beyond the circumference of the pipe from 16 to 20 inches in all directions except beneath the pipe. Therefore, the ditch must be deepened and widened up to 24 inches to account for the pipe weights and to still maintain the required three foot of cover pursuant to US DOT requirements (49 CFR 192). A wider ROW is required to account for the wider ditch, plus the additional space necessary to store the spoil, and the space required to handle and transport the weights into and across the wetland. Each weight requires a single side-boom or a back-hoe to handle, carry, and place the weight. Therefore, depending on the length of the wetland crossings, more equipment is necessary and adequate space required to maneuver the equipment placing and transporting the weights into and across the wetlands.
- Multiple side booms are required to handle the large diameter of the proposed pipe. ETC Tiger’s contractors will maneuver the side booms and “leap frog” the equipment, requiring the additional width to allow construction to move in an “assembly line” approach. By limiting the width of the ROW, multiple passes would be necessary which will result in extended crossing durations, multiple wetland crossing passes, increased spoil compaction, and more difficult wetland restoration.
- To move the pipe into and up/down the ROW for stringing, welding, and eventual installation, a larger ROW is required to facilitate access along the ROW. Due to the size of the pipe and ETC Tiger’s use of double jointed pipes, additional, larger and longer trucks are necessary to transport the pipe. To ensure the trucks can maneuver down the ROW without trapping the trucks or congesting the ROW, a larger ROW is necessary to allow access and to reduce the number of passes across a wetland.
- ETC Tiger intends to utilize automatic welding to improve the welding speed or efficiency without losing quality. Automatic welding improves the welding consistency, accuracy and quality and ETC Tiger believes it will ultimately lead to a safer pipeline. To utilize automatic welding, welding shacks are employed to house the welding equipment. These shacks take additional space in the ROW to operate during welding and to move along the ROW during construction. When coupled with the other equipment and pipe weights, additional room is necessary to have adequate space to facilitate construction.

- A wider ROW will reduce the duration of construction, thus reducing the potential environmental impacts associated with soil compaction, erosion and sedimentation, potential storm-related impacts, unintended construction-related events, and construction equipment emissions. Further, appropriate ROW widths provide adequate space to store the spoil material and separate the sub soil from the top soil to improve and shorten the duration of restoration.
- Overall the expanded workspace will allow for shorter construction duration which translates into more economical project costs. Decreased production that results from congested workspace results in upwards of 30 percent increases in cost. This increase in cost increases the overall rates to the customers/shippers on the pipeline and ultimately increases the cost of natural gas to the end users.

- 10. Consistent with Section VI.A.5 of ETC Tiger's Wetland and Waterbody Construction and Mitigation Procedures (Procedures), submit site-specific construction plans for waterbody crossings within or adjacent to wetland crossings where the measures identified in Sections V and VI cannot be met (Appendix 1E).**

Response:

ETC Tiger will comply with the requirements in Sections V and VI of ETC Tiger's Procedures for all waterbodies that are crossed within wetlands as outlined in those sections and as shown on the alignment sheets. If before or during construction, ETC Tiger identifies areas not included in its Procedures where it cannot comply with Sections V and VI, ETC Tiger will submit the appropriate construction plans.

RESOURCE REPORT 2 – WATER USE AND QUALITY

- 11. Confirm whether the wetlands (WET) and/or waterbodies (CRK) shown on the following meter station plot plans will be permanently impacted by gravel, crushed rock, concrete, asphalt, or other materials within the fenced and gated site. Provide revised impact acreages as applicable.**
- a. EnCana (MP 50.2) permanent access road TH-RR-410.5-PAR-3A;**
 - b. Tristate North Louisiana Midstream, LLC (Tristate, MP 59.3);**
 - c. Tennessee Gas Pipeline Company (Tennessee Gas, MP 113.9); and**
 - d. ANR Pipeline Company (ANR, MP 166.4).**

Response:

There will be no impacts to wetlands and waterbodies at the meter stations for Encana (MP 50.2), Tristate (MP 59.3), Tennessee Gas (MP 113.9), or ANR (MP 166.4) as shown on the drawings provided in Attachment 2 in response to Data Request 4. The permanent access road TH-RR-410.5-PAR-3A will be culverted to maintain hydrology of the stream (CRK L22, an ephemeral stream), thus avoiding any short- or long-term permanent impacts. At the Tristate receipt meter, ETC Tiger will maintain a minimum of 10 feet between gravel installed at the site and Creek CRK L44 (an intermittent stream). The tip of one small wetland (WET E1) that extends into the northeast corner of the Tennessee Gas delivery meter interconnect is too far from the meter facilities to be affected. At the ANR delivery meter, a minimum setback of 10 feet to a maximum of 50 feet will be maintained between gravel installed at the site and Wetland WET 91.

- 12. With respect to the identification of water wells within 150 feet of construction work areas, clarify or resolve the inconsistencies between Table 2.3-1 (pg. 2-38, 2-39) and the following residential site-specific plans (Appendix 8B):**
- a. CA-3246-501 (MP 14.6); and**
 - b. CA-3246-509 (MP 62.7).**

Response:

Enclosed in Attachment 1 to this data response is the following updated table:

Table 2.3-1 "REVISED" – Water Supply Wells and Spring within 150 feet of Construction Work Areas for the Tiger Pipeline Project.

This table has been revised to incorporate additional field data (the deletion of wells at MPs 38.6, 93.2, and 93.3 for the reasons noted on the table), a corrected MP for the well at MP 14.6, and the addition of the well shown on the site-specific residential plan at MP 62.7. In addition, the table has been expanded to include the direction of the well from the construction work area and mitigation measures to be employed at each well location.

Enclosed in Attachment 3 to this data response are the following updated site-specific non-residential and residential implementation plans that correspond to the wells listed in Table 2.3-1 "Revised".

CA-3246-501 (MP 14.6)
CA-3245-509 (MP 62.7)
CA-3293-504 (MP112.9)
CA-3293-516 (MP 115.9)
CA-3293-502 (MP 145.0)
CA-3293-508 (MP163.9)

13. For each additional temporary workspace (ATWS) located within a wetland as identified in Table 2A-4, provide the acres of wetland that will be impacted.

Response:

Acres affected by ATWS in wetlands were provided in Table 2A-5 (Wetlands Crossed by the Tiger Pipeline Project) under the column labeled "Acres Affected by Construction." This column breaks down acreage impacts for each wetland by Construction Right-of-Way, Permanent Right-of-Way, and ATWS.

RESOURCE REPORT 3 – FISH, WILDLIFE, AND VEGETATION

- 14. Table 2A-5 indicates that old growth forest habitat is crossed between MP 1.27 and MP 1.52; however, this old growth forest is not reported in Table 3.3-1 (pg. 3-29). Clarify this apparent inconsistency.**

Response:

Table 3.3-1 is correct.

Enclosed in Attachment 1 to this data response is the following updated table that has been revised to remove the reference to old growth forest between MPs 1.27 and 1.52.

Table 2A-5 “REVISED” – Wetlands Crossed by the Tiger Pipeline Project

RESOURCE REPORT 4 – CULTURAL RESOURCES

- 15. Indicate what measures have been taken to address the concerns identified in the June 4, 2009 comment form submitted by the Tribal Historic Preservation Officer for the Caddo Nation (pg. 4-4, Appendix 4B);**

Response:

ETC Tiger attempted calls to Mr. Cast, the Tribal Historic Preservation Officer for the Caddo Nation, on October 6 and October 12, 2009, and sent an e-mail communication on October 10, 2009 (see Attachment 4 to this data request). To date, Mr. Cast has not responded. ETC Tiger will file a summary of any discussions with Mr. Cast as soon as contact has been made.

RESOURCE REPORT 6 – GEOLOGICAL RESOURCES

16. Clarify whether the distances provided in Table 6.3-1 are from the edge of the construction or permanent pipeline right-of-way or aboveground facility site (pg. 6-7).

Response:

The distances provided in Table 6.3-1 are from the edge of the construction right-of-way for the Tiger Pipeline and from the edge of the site boundaries for the aboveground facilities.

RESOURCE REPORT 7 – SOILS

17. Resolve the following issues or inconsistencies:

- a. Table 7.2-1 (pg. 7-5): Percentage sum of the soil series within the Texas Eastern Transmission, L.P. (TETCO) Meter Station does not equal 100 percent. Also, check Table 7A-2 and make any needed corrections to ensure consistency with revised Table 7.2-1.**
- b. Table 7A-2 (Appendix 7A): Acreage totals for the aboveground facilities do not match those provided in Table 8A-2.**

Response:

Enclosed in Attachment 1 to this data response is the following revised table that corrects the discrepancies.

Table 7.2-1 “REVISED” – Percentage of Soil Series Within Property Boundaries for Aboveground Facility Footprints Larger than Five Acres

Table 7A-2 provides information regarding the soils present within the total parcel to be acquired by ETC Tiger for the aboveground facilities. These values are consistent with the “Land to be Acquired” column in Table 1.3-2, Summary of Land Requirements. Table 8A-2, Land Affected by Construction and Operation of the Tiger Pipeline Project (acres), lists impacts associated with construction and operation of these aboveground facilities, not the total acres to be acquired. Enclosed in Attachment 1 to this data response is the following revised table that clarifies the information being presented

Table 7A-2 “REVISED” – Soil Associations and Limitations within Lands to be Acquired for the ETC Tiger Pipeline Aboveground Facilities

RESOURCE REPORT 8 – LAND USE, RECREATION, AND AESTHETICS

- 18. Mapping provided with ETC Tiger's filing on September 8 depict property in the vicinity of MP 139 labeled "United States of America". Previous filings show this same property in private ownership. Provide a description of this parcel, including ownership (agency), purpose, and results of consultation and easement negotiations with the agency. Indicate whether special construction techniques or mitigation measures are requested by the agency and ETC Tiger's willingness to adopt them.**

In addition, provide an update to the public lands discussion in Resource Report 8 to reflect a proposed crossing of this property.

Response:

Tract number TH-OU-823.000 near MP 139 was purchased by the USACE Vicksburg District on July 29, 2009 from Terran, Inc. Prior to the USACE transaction, ETC Tiger purchased an easement from Terran, Inc. on July 9, 2009, as filed in the Ouachita County Clerk's Office on July 10, 2009.

As discussed during the October 6, 2009 meeting between the USACE and ETC Tiger, and the FERC staff via telephone, this property will be developed by the USACE as mitigation for the USACE Mississippi Levees Program (see Meeting Notes enclosed in Attachment 4 to this data response). It is the USACE's intent to convert existing cultivated land on this tract into bottomland hardwood forested wetlands by tree plantings in 2011 and 2012.

ETC Tiger purchased the easement for the ETC Tiger Pipeline from Terran, Inc. prior to the USACE purchase and the ETC Tiger Pipeline will be installed in accordance with that easement. Because the USACE purchased the tract subject to the easement already negotiated between ETC Tiger and Terran, Inc., no changes to the easement are necessary and no further consultations or easement negotiations are required for this property. As discussed during the October 6, 2009 meeting, the USACE has not requested special construction techniques or additional mitigation measures beyond those previously proposed as part of ETC Tiger's application for the Nationwide Permit No. 12, Pre-Construction Notification.

Resource Report 8, Section 8.5:

Enclosed in Attachment 1 to this data response is the following updated table that has been revised to include the recent purchase of the Terran, Inc. tract by the USACE.

Table 8.5-1 "REVISED" – Public Land, Recreation, and Other Designated Areas Crossed By or Near The Tiger Pipeline

The following paragraphs provide a description of this property.

The ETC Tiger Pipeline will cross lands recently acquired by the USACE from Terran, Inc. between approximate MPs 138.1 and 140.5. This tract (TH-OU-824.000) comprises approximately 2,955 acres of mostly agricultural land lying west of Bayou Lafourche. According to the terms of the sale agreement, the vendor (Terran, Inc.) will have continued use of all of the land for agricultural purposes for the 2010 crop year, or until December 31, 2010, and of half of the land for the 2011 crop year, or until December 31, 2011. Following expiration of the crop rights, the USACE will replant the tract with bottomland hardwoods to mitigate for USACE projects, primarily its Mississippi Levees Program.

ETC Tiger acquired a signed easement agreement with Terran, Inc. prior to the sale of the tract to the USACE and this easement is part of the sale agreement between Terran, Inc. and the USACE. The easement conveys an exclusive 60-foot-wide permanent easement to ETC Tiger for the crossing (approximately 12,005 feet or 2.3 miles), as well as a 90-foot-wide temporary construction right-of-way, additional temporary workspace (including that needed for the horizontal directional drill at Bayou Lafourche), and use of Access Roads TH-OU-824-TAR-28 and TH-OU-824-TAR-29.

Because this tract is currently used for agriculture and will continue in agricultural use until 2012, ETC Tiger will implement agricultural construction techniques during construction and restoration of the right-of-way.

19. Provide consultation results with Franklin Parish regarding planned or proposed developments (pg. 8-11).

Response:

Enclosed in Attachment 1 to this data response is documentation of a telephone conversation with Franklin Parish on September 29, 2009. Based on this discussion with the Franklin Police Jury, there are no planned or proposed developments in Franklin Parish, Louisiana.

- 20. Revise site-specific plan drawings and/or implementation plan notes in Appendix 8B to indicate:**
- a. Structures that will be removed or relocated; and**
 - b. The proposed site-specific construction techniques to be used at each location. For example, site-specific plan CA-3246-502 for the abandoned house at MP 38.6 indicates that there will be “No work space closer than 8 feet to the home”, but Table 8A-3 indicates that the structure is within the construction work area and will be removed.**

Response:

Enclosed in Attachment 3 to this data response are updated site-specific non-residential and residential implementation plan drawings where the notes have been revised to clearly describe construction plans (removal or relocation) and mitigation measures. Included is the updated drawing for CA-3246-502.

Enclosed in Attachment 1 to this data response is the following updated table that has been revised to reflect the updated site-specific drawings.

Table 8A-3 “REVISED” – Residences and Structures Within 50 feet of Construction Work Areas

21. Clarify whether the mature pecan trees along the edge of the construction work area near MP 112.9 as shown in site-specific plan CA-3293-504 will be protected (Appendix 8B).

Response:

Enclosed in Attachment 3 to this data response is the updated site-specific residential plan CA-3293-504. As proposed, ETC Tiger will install the pipeline by boring between the mature pecan trees as shown on the updated site-specific plan CA-3293-504. While the construction work area will include access along a portion of the permanent right-of-way that borders the northern pecan trees, safety fencing will be installed along the drip line of these trees to avoid construction disturbance within this area.

- 22. Site-specific plan CA-3293-515 (Appendix 8B) depicts a structure within the construction work area at MP 121.2, but Table 8A-3 does not designate that it will be removed or relocated. Indicate what mitigation measures will be taken.**

Response:

Enclosed in Attachment 3 to this data response is the updated site-specific plan CA-3293-515. This drawing has been revised to reduce the construction work area in the vicinity of the deer camp “house” and maintain an 8-foot separation between the deer camp “house” and the construction work area.

RESOURCE REPORT 9 – AIR AND NOISE QUALITY

- 23. Revise Table 9.2.3-4 to include the summary of the predicted sound level contribution of the new station equipment at the “one mile” calculation point as indicated in the text (pg. 9-20).**

Response:

Enclosed in Attachment 1 to this data response is the following updated table. This table includes the predicted sound level contribution of the new station equipment at the “one mile” calculation point as described in the text of Resource Report 9 on page 9-20. Calculation data for this “one-mile” calculation point are included in Resource Report 9, Appendix 9C-3, filed with ETC Tiger’s application.

Table 9.2.3-4 “REVISED” – Bienville Station Sound Level Predictions

24. Revise Tables 9.2.X.5 to include the sound power level of Utility Coolers (engine coolers) and Gas Aftercoolers as indicated in the text (pg. 9-23).

Response:

The required sound power level for each Utility Cooler and Gas Aftercooler are listed in Tables 9.2.X-3, not in Tables 9.2.X-5 and was incorrectly stated in Resource Report 9, Section 9.2.5. The four 9.2.X-3 tables contain the sound pressure level and sound power level information for each of the compressor stations.

There are two incorrect table references in the text of Resource Report 9, Section 9.2.5. The revised paragraphs provided below contain the required revisions with deletions shown in ~~strikethrough~~ text and additions in red text/underline. Additional sentences, shown in red text/underline, are also provided to clarify the location of the sound power level data.

Revised Paragraph 1 of Resource Report 9, Section 9.2.5 (page 9-22):

“The noise treatments described in this section apply in common to all four of the compressor stations. The performance requirements for the individual stations, ~~except for the Bienville Compressor Station for which there are no required noise control treatments,~~ are given respectively in Tables 9.2.1-5, 9.2.2-5, 9.2.3-5, and 9.2.4-5 for the Carthage, Cannisnia, Bienville, and Chatham Compressor Stations, respectively. (These ~~three~~ four tables will be referred to as Table 9.2.X-5 in this section.) The sound power level and sound pressure level data used in the computer model for each compressor station, as shown in Tables 9.2.X-3, should be used in the specification of the air-cooled heat exchangers and the compressor building ventilation systems.”

Revised Paragraph 5 of Resource Report 9, Section 9.2.5, Compressor Building, (page. 9-23):

“All building ventilation openings including roof gravity relief exhausts will include standard acoustical louvers or silencers such that the total sound pressure level contribution of each opening does not exceed 65 dB(A) at 12 feet from the opening. The sound pressure level calculated for the interior of each building due to the engine and compressor equipment is shown in the relevant version of Table 9.2.X-~~5~~3. The sound level target for each ventilation opening includes the sound level contribution of both the mechanical equipment inside the building along with the sound levels due to any required ventilation fans. The ventilation system supplier should submit the sound power level of the proposed building ventilation fans during the bidding process for review. “

Revised Paragraph 1, Section 9.2.5, Utility Coolers (Engine Coolers) and Gas Aftercoolers
(pages 9-23 and 9-24):

“The sound power level of the Utility Coolers and the Gas Aftercoolers for each unit will not exceed the sound power levels given in the versions of Table 9.2.X-~~5~~3. These sound power levels are based on manufacturer data supplied by Moore Fans and Howden Fans for the currently planned coolers for the proposed stations.”

Bienville Compressor Station:

Enclosed in Attachment 1 to this data response is the following updated table.

Table 9.2.3-5 “NEW” – Bienville Station Required Noise Control Treatments

This new table provides the noise control treatment measures for the Bienville Compressor Station. As stated in Resource Report 9, there are no noise sensitive areas within one mile of the Bienville Compressor Station and the one-half-mile and one-mile calculations have been included as points of reference. The noise control treatments in Table 9.2.3-5 “New” are included in the computer model for the Bienville Compressor Station (provided with ETC Tiger’s Resource Report 9) as part of ETC Tiger’s standard compressor station design practice, and will result in the sound levels shown in Table 9.2.3-4.

RESOURCE REPORT 10 – ALTERNATIVES

- 25. Sections 10.5.1 through 10.5.5 state that each of the route alternatives would require construction of lateral pipeline facilities to reach the designated interconnect sites. For each route alternative, provide the following additional information:**
- a. Quantify the land requirements of the lateral pipeline facilities and associated impacts for each route alternative; and**
 - b. Update Table 10.5-1 to provide the environmental comparison information for each.**

Note: Sections 10.5.1 through 10.5.5 and Table 10B-1 provide the length of lateral pipeline facilities required for every Route Alternative. The text does not quantify additional impacts beyond stating “further increasing impacts” and Table 10B-1 does not provide any revised environmental impacts associated with lateral pipelines. Using the lateral lengths provided in Table 10B-1 and the alignments depicted on Figures 10.5-1 through 10.5-5, provide wetland and upland land use acreage impacts associated with the lateral pipeline facilities. Include construction right-of-way width(s) used to calculate impacts. For each Route Alternative, update the number of waterbody, road, and wildlife management area (WMA) crossings, and hazardous waste sites within 0.5 mile accordingly.

Response:

Enclosed in Attachment 1 to this data response is the following updated table.

Table 10B-1 “REVISED” – Environmental Comparison of Route Alternatives

Table 10B-1 was filed with ETC Tiger’s application and replaces Table 10.5-1 that was originally filed with ETC Tiger’s draft resource reports. Table 10B-1 now includes the land requirements and environmental comparison information for the lateral pipeline facilities for each route alternative.

26. Provide an update on the route variation requested by the Louisiana Department of Wildlife and Fisheries at the Nolan WRP parcel.

Response:

ETC Tiger met with the Louisiana Department of Wildlife and Fisheries (LADWF) and the Natural Resources Conservation Service (NRCS) on September 10, 2009 to discuss alternatives at the Nolan WRP parcel (see meeting notes filed with the FERC on October 6, 2009). In that meeting, ETC Tiger, the NRCS, and the LADWF discussed the proposed route that will avoid the WRP property and two alternate routes that would cross through the property. The proposed route will require clearing of approximately 7.5 acres of unfragmented, mature forested wetlands, while the alternate routes would affect approximately 0.47 acres of the WRP property and significantly less forested wetlands. The consensus of the meeting participants was that use of the alternate routes would be more beneficial to the environment. However, use of either alternate route would require modification of ETC Tiger's existing easement on land outside of the WRP property. The land abutting the WRP property was privately owned at the time that ETC Tiger obtained its easement and that easement became part of the subsequent sale of the tract to the USACE (see response to Data Request No. 18).

ETC Tiger met with the USACE on October 6, 2009 to discuss the possibility of revising the existing easement on USACE land to accommodate an alternate route that would avoid clearing of the forested wetlands and would cross through the Nolan property. The USACE stated that, because of the complexity involved in establishing an easement across USACE lands, the sale had been delayed to allow ETC Tiger to complete negotiations of its easement with the private landowner prior to the sale of the tract. To revise the easement to accommodate an alternate route through the Nolan WRP would require extensive Congressional review and approval, a process that would take approximately 8 to 12 months.

Because the proposed route avoids the WRP property and revision of the existing easement would significantly affect ETC Tiger's in-service date and contractual commitments to the shippers on the pipeline, use of an alternate route in the vicinity of the WRP property was eliminated from further consideration.

27. Provide maps depicting the alternate compressor station sites presented in Table 10B-3.

Response:

Enclosed in Attachment 3 to this data response are the following figures showing the locations of the alternate compressor station sites.

Figures 10.7-1 – Compressor Station Alternate Sites (Sheets 1 through 11)

28. Revise Table 10B-3 to include the following information:

- a. Acres of wetland that would be affected by construction and operation of a compressor station at each alternate location;**
- b. Percent of prime farmland soils affected by construction and operation for each alternate compressor station location;**
- c. Whether there are visual concerns at the alternate compressor station site at MP 53.5;**
- d. Number and location of noise sensitive areas (NSAs) within 0.25 and 0.5 mile of the alternate compressor station site at MP 54.5; and**
- e. Parcel availability at alternate compressor station site at MP 53.5.**

Response:

Enclosed in Attachment 1 to this data response is the following updated table.

Table 10B-3 "REVISED" – Environmental Characteristics of Alternate Compressor Station Sites

This table has been revised to include: a) acres of wetland that would be affected by construction and operation at each compressor station site based on National Land Cover Data (NLCD 2001), b) percent of prime farmland soils that may be affected at each alternate compressor station site, c) visual concerns at the alternate compressor station site at MP 53.5, d) number and location of NSAs within 0.25 and 0.5 mile of the alternate compressor station site at MP 54.5; and e) parcel availability at the alternate compressor station site at MP 53.5.