



November 25, 2015

Mr. Kevin Kotelly
U.S. Army Corps of Engineers
New England District – Regulatory Division
696 Virginia Road
Concord, MA 01742-2751

**Re: Section 404 Permit Application (File Number is NAE-2014-644)
Northeast Energy Direct Project
Pennsylvania, New York, Massachusetts, New Hampshire, Connecticut**

Dear Mr. Kotelly:

Attached is an application (original) of the Tennessee Gas Pipeline Company, L.L.C. (“Tennessee” or “TGP”) for activities within federal wetlands and waterbodies which are necessary to construct a new natural gas pipeline Project. The proposed Project involves the expansion and modification of Tennessee’s existing pipeline system in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut. The Northeast Energy Direct Project (“NED Project” or “Project”) includes the following facilities:

- Approximately 41 miles of pipeline looping on Tennessee’s 300 Line in Pennsylvania;
- Approximately 133 miles of new pipeline, of which 102 miles are proposed to be generally co-located with the certificated Constitution Pipeline Project (“Constitution”) in Pennsylvania and New York (extending from Tennessee’s existing 300 Line near Auburn, Pennsylvania to Wright, New York);
- Approximately 54 miles of pipeline generally co-located with Tennessee’s existing 200 Line and an existing utility corridor in New York;
- Approximately 64 miles of pipeline generally co-located with an existing utility corridor in Massachusetts;
- Approximately 70 miles of pipeline generally co-located with an existing utility corridor in New Hampshire (extending southeast to Dracut, Massachusetts);
- Approximately 58 miles of various laterals and pipeline looping segments in Massachusetts, New Hampshire, and Connecticut to serve local markets;
- Construction of nine new compressor stations and 15 new meter stations, and modifications to an existing compressor station and 14 existing meter stations throughout the Project area; and
- Construction of appurtenant facilities, including mainline valves (“MLVs”), cathodic protection, and pig facilities through the Project area.

The Project is needed to meet the current demand for increased natural gas in the region and is not related to or contingent upon other potential projects or expansions by Tennessee in the area. Tennessee has evaluated alternative routes to serve the increased demand for the area served by the existing pipeline network, and is proposing routes that minimize impacts to the environment. To the extent that it is practicable, feasible, and in compliance with existing law, Tennessee proposes to locate proposed pipeline facilities (either pipeline looping segments or co-located pipeline facilities) generally within or adjacent to its existing right-of-way (“ROW”) associated with its existing 300 Line in Pennsylvania and Connecticut;



its existing 200 Line in New York and Massachusetts; and existing utility (pipeline and powerline) corridors in Pennsylvania, New York, Massachusetts, New Hampshire, and Connecticut.

Tennessee is filing an application seeking the issuance of a certificate of public convenience and necessity from the Federal Energy Regulatory Commission ("Commission") for the construction and operation of the proposed Project. In accordance with the Commission guidelines under the Energy Policy Act ("EPAAct") of 2005, which requires applicants filing for a certificate from the Commission under Section 3 or 7 of the Natural Gas Act to submit all federal authorizations before or concurrently with the project's final application to the Commission, Tennessee is submitting this federal application to the New England District U.S. Army Corps of Engineers ("USACE") for review for project components in Massachusetts, New Hampshire, and Connecticut in relation to permits sought under Section 404 of the Clean Water Act. Pending guidance received from you regarding filing and review of the different components of the project, Tennessee is also providing a copy of this application to the Baltimore District of the USACE for facilities located in Pennsylvania and the Buffalo and New York Districts of the USACE for the facilities to be built in New York. Tennessee also submitted Section 401 Water Quality Certification applications to the Pennsylvania Department of Environmental Protection ("PADEP"), New York State Department of Environmental Conservation ("NYSDEC"), Massachusetts Department of Environmental Protection ("MADEP"), New Hampshire Department of Environmental Services ("NHDES") and the Connecticut Department of Energy and the Environment ("CTDEEP") on November 20, 2015.

Field surveys were initiated in June 2014 and were suspended in November 2014 due to winter weather conditions. Additional field surveys re-commenced in March 2015 and are ongoing. This application presents impact information for the entire project including field verified features and data in areas where survey permission was granted (through September 2, 2015), and aquatic features interpolated from either high resolution aerial imagery or desktop data in areas where surveys have not yet been completed. This application only includes Site-Specific wetland and waterbody permit drawings for those features that were field verified. Site-Specific wetland and waterbody permit drawings are not provided for interpolated or desktop identified features. Field surveys were conducted in accordance with the *Corps of Engineers Wetlands Delineation Manual* (USACE 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Northcentral and Northeast Region* (USACE 2012). Supplemental data will be provided to the USACE as field surveys are completed in areas where survey permission was denied.

For ease of your review, Tennessee has split this application into four sections; one section for each USACE District containing information for each respective state(s), and one section for Project-wide appendices. We trust you will find this package contains adequate information necessary for your initial review. If you have any questions or need additional information, please contact me at (713.420.5360) or by email at michael_letson@kindermorgan.com.

Sincerely,

Michael Letson
Project Manager, Tennessee Gas Pipeline Company, L.L.C

Encl.