



MASSACHUSETTS PIPELINE AWARENESS NETWORK

www.MassPLAN.org

December 17, 2014

VIA EMAIL

James D. Hartman
Tennessee Gas Pipeline Company, LLC
1615 Suffield Street
Agawam, MA 01001

RE: Misleading letter to landowners

Dear Mr. Hartman:

I have been provided copies of your December 12, 2014 letter to landowners along the proposed route for the Northeast Energy Direct pipeline.

The second paragraph of your letter begins: “The Project is a federal undertaking.” Mr. Hartman, the project is a private undertaking, and your company is seeking approval from the federal government. Your letter is crafted in such a way as to lead landowners to believe that the project has been approved, or even undertaken, by the federal government. One concerned citizen has written to me that, “Having been given the impression by [TGP] that he had no choice,” her friend gave your company permission to survey his land. He now knows that he can rescind permission, but not everyone is so well-informed.

Either prior to or in conjunction with notifying landowners of the open house schedule, I ask that your company include an explicit correction of your misleading statements, making clear above all else: While FERC has authorized TGP to use the agency's pre-filing procedures, **neither FERC nor any other government agency has approved the project in any way. This project is a private undertaking, not a federal undertaking, as erroneously stated in a previous letter.** Other misleading statements in your December 12th letter that warrant public correction by your company are outlined below.

In this letter, you assert that this project “is being developed to serve specifically the New England region” – even though your company's letter to FERC seeking to use pre-filing procedures states, “Potential Atlantic Canada customers include LDCs, power generators, industrials, and liquefied natural gas ('LNG') export projects.”

You also state that the project “will enable New England ... to lower energy costs,” even though (1) you do not and cannot promise lower energy costs, (2) natural gas prices are established by highly volatile commodities markets, and (3) the US EIA has concluded, “Increased LNG exports lead to increased natural gas prices.”¹

Additionally, your letter states that the originally proposed Market Path component of the project consisted of approximately 177 miles of mainline pipeline and eight lateral lines totaling approximately

¹ “Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets,” October 29, 2014, *U.S. Energy Information Administration* (<http://www.eia.gov/analysis/requests/fe/>).

73 miles, while “the proposed revised route will now include approximately 188 miles of ... mainline pipeline facilities,” with no mention of the laterals. This leaves the false impression that either there are no longer laterals proposed or that the proposed number and route of laterals has not changed.

Furthermore, I do not believe there is any factual basis for your assertion that the company's new plan of widening utility corridor clearings, or putting clearings parallel to existing cleared corridors, would have the affect of “avoiding habitat fragmentation,” rather than exacerbating it.

It is also worth noting that the maps that your company has made available to the public are unwieldy and do not allow landowners to easily locate their own towns to see the proposed route; the files uploaded by your company to FERC's website are not named by geographic location. Inasmuch as “Tennessee strives to be a good neighbor,” please consider remedying this situation as well, with maps filed at FERC that show town boundaries, including file names or descriptions that reference the towns depicted. Should this prove too much of an administrative burden prior to the holidays, please send me the GIS shape files for the proposed route so that we can help individuals access the information they seek.

Finally, on the third page of your letter, you state that your company plans “in January to start meeting with affected landowners on a one-on-one basis to discuss survey needs and additional details regarding the Project.” Kindly advise landowners that, should they choose to meet with TGP representatives, they may bring along an attorney.

Best wishes for the holiday season,



Kathryn R. Eiseman, Director
Massachusetts PipeLine Awareness Network

Cc:

Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission
Senator Elizabeth Warren
Senator Edward Markey
Congressman Richard Neal
Attorney General Martha Coakley
Thomas Lesser, Esq.



Tennessee Gas Pipeline
Company, L.L.C.
a Kinder Morgan company

December 12, 2014

RECEIVED
DEC 15 2014
J.W.R.

RE: Tennessee Gas Pipeline Company, L.L.C.
Northeast Energy Direct Project, Docket No. PF14-22-000

Dear Ms. [REDACTED]

As you may be aware, Tennessee Gas Pipeline Company, L.L.C. (“Tennessee”) is planning to expand its existing pipeline system to serve the growing demand for interstate natural gas transmission service in the northeastern United States. The Northeast Energy Direct Project (“Project”) is being developed to serve specifically the New England region. The New England region, as a whole, stands to benefit from the NED Project as it will enable New England to sustain its reliance on natural gas-fired generation and to lower energy costs by providing scalable transportation capacity attached to lower cost, near-by domestic natural gas. Access to significant, reliable and abundant quantities of lower priced natural gas will benefit New England consumers and will encourage capital investment in commercial and industrial ventures adding to the region’s economy. The Project will provide regional confidence in competitively priced natural gas supplies for decades to come providing stability in a critical fuel source. As part of Tennessee’s fully integrated natural gas pipeline transportation system, the Project also will provide additional access to diverse supplies of natural gas to expansion customers in the New England region.

The Project is a federal undertaking that is regulated by the Federal Energy Regulatory Commission (“FERC”) under Section 7(c) of the Natural Gas Act. On September 15, 2014, Tennessee requested authorization to use the FERC’s Pre-Filing Process (“Process”) for the Project. The FERC approved Tennessee’s request on October 2, 2014 in FERC Docket No. PF14-22-000. The Process is a mechanism that allows the involvement of all relevant agencies and interested stakeholders at an earlier stage of the Project development than the FERC’s traditional certificate process for review and approval of pipeline projects. By using the FERC’s Process, Tennessee and the FERC have the opportunity to identify and resolve issues by consulting with stakeholders, including affected landowners, and participating agencies through meetings, telephone calls, and/or written correspondence prior to Tennessee filing a formal certificate application for approval to construct the Project with the FERC.

On November 5, 2014, Tennessee filed with the FERC draft Resource Report 1 (General Project Description) and Resource Report 10 (Alternatives) and an updated stakeholder list for the Project. The draft of Resource Report 1 reflected the information available as of the date of that filing regarding the proposed Project facilities and anticipated land requirements, construction procedures, and permitting/clearance requirements for the Project. The draft of

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Resource Report 10 included the alternatives (system and routing) that Tennessee identified and a discussion of the evaluation of those identified alternatives as of the date of that filing. In the November 5, 2014 draft Resource Report 10, Tennessee presented evaluations of several major route alternatives for portions of the Project. Among the route alternatives for the Wright, New York to Dracut, Massachusetts Pipeline Segment (referred to as the Market Path Component of the Project) discussed in the draft Resource Report 10 were the New York Powerline Alternative and the New Hampshire Powerline Alternative (see Sections 10.3.1.2 and 10.3.1.8 of draft Resource Report 10). These identified alternatives involved co-locating the pipeline along an existing electric transmission line corridor in eastern New York, western Massachusetts, and southern New Hampshire.

In its ongoing effort to critically evaluate feasible alternatives for the Project, Tennessee has now determined that it will adopt both the New York Powerline Alternative and the New Hampshire Powerline Alternative as its proposed route. Therefore Tennessee will modify the originally proposed route for the Wright, New York to Dracut, Massachusetts Pipeline Segment of the Project. The Market Path component of the Project that is being revised originally consisted of approximately 177 miles of new and co-located mainline pipeline and eight new pipeline laterals totaling approximately 73 miles. With the adoption of the New York Powerline Alternative and the New Hampshire Powerline Alternative, the proposed revised route will now include approximately 188 miles of new and co-located mainline pipeline facilities as follows: (a) approximately 53 miles of pipeline generally co-located with Tennessee's existing 200 Line and an existing power utility corridor in eastern New York near the proposed Market Path Mid Station No. 1; (b) approximately 64 miles of pipeline generally co-located with an existing power utility corridor in western Massachusetts; and (c) approximately 71 miles of pipeline generally co-located with an existing power utility corridor in southern New Hampshire, extending east to the proposed Dracut, Massachusetts Market Path Tail Station.

One of primary reasons that led to Tennessee's decision to adopt the New York Powerline Alternative and New Hampshire Powerline Alternative for the Project is that they will enable a very substantial portion of the proposed new pipeline construction to be adjacent to, and parallel with, existing utility corridors in the states of New York, Massachusetts and New Hampshire. By increasing the percentage of co-location for the proposed pipeline segment, the revised route will reduce the construction of new pipeline facilities in undeveloped portions of the Market Path region, thus reducing environmental impacts and avoiding habitat fragmentation. In addition, the proposed route change will enable Tennessee to avoid (in certain cases) and to minimize (in other cases) the crossing of Article 97 properties and Areas of Critical Environmental Concern in Massachusetts.

Tennessee submitted supplemental information to the FERC on December 8, 2014 to reflect the revisions to the proposed route for the Project. That filing included a full description of the revised route and the proposed facilities for the Project. Also included is an updated stakeholder list for affected landowners, regulatory agencies, and governmental officials in the Project area. You are receiving this notification letter as you have been identified as a landowner affected by the proposed Project, including the revised pipeline route.

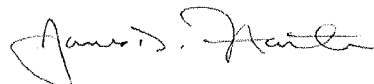
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Tennessee plans to host open houses in the Project area during the period January 2015 through March 2015 to provide additional information and answer questions concerning the Project. Tennessee will provide information regarding the open house schedule to you when the dates and locations for those open houses have been established. Tennessee also plans in January 2015 to start meeting with affected landowners on a one-on-one basis to discuss survey needs and additional details regarding the Project.

Tennessee strives to be a good neighbor and appreciates your ongoing interest in this Project. A toll-free telephone number, (844) 277-1047, for Project / landowner inquiries is available, along with a dedicated email address, nedinfo@kindermorgan.com. Incoming telephone calls and emails will be directed to the appropriate Project discipline to be returned as soon as possible.

Very truly yours,

A handwritten signature in black ink, appearing to read "James D. Hartman". The signature is written in a cursive style with a large initial "J" and "H".

James D. Hartman
Agent-Right of Way SR II
Tennessee Gas Pipeline Company, LLC

Document Content(s)

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