August 15, 2014

Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC  20426

Re:  Williams Partners, d/b/a Transcontinental Gas Pipe Line Company, LLC.
     Atlantic Sunrise Project,
     FERC Docket No. PF14-8

Dear Secretary Bose:

The mission of the Lebanon Valley Conservancy (Conservancy) is to promote the conservation and preservation of the unique cultural, historical and natural resources of our region, for the benefit of present and future generations.

In keeping with our mission, the Conservancy hereby submits the following comments in connection with submission of Williams Partners d/b/a Transcontinental Gas Pipe Line Company, LLC (Williams) for the installation of a large natural gas distribution pipeline to be known as the Atlantic Sunrise Project, [Federal Energy Regulatory Commission (FERC) Docket No. PF14-8], between the existing Zick Compressor Station located in northern Pennsylvania and the existing River Road Regulator, located in Drumore Township, Lancaster County, Pennsylvania.

The Conservancy's statement is specifically directed towards that portion of the Atlantic Sunrise Project dubbed the Central Penn Line South infrastructure route intended to be sited in Schuylkill County, Lebanon County and Lancaster County, all within the Commonwealth of Pennsylvania.

The Conservancy recognizes the potential economic benefits and necessity of transporting Marcellus Shale gas from wellheads to markets, but is also very cognizant that the Atlantic Sunrise Project is intended to ship large quantities of a Pennsylvania natural resource under high pressure to non-domestic customers, with no benefit to local property owners who will lose the use of portions of their properties while carrying all of the risks of having a very large gas pipeline cross their respective lands.

In its Shale Gas Extraction policy statement, the Conservancy recognizes the need for the wise use of our natural resources and encourages the use of environmentally sound practices so as to maintain our vision to protect and enhance critical and other resources that define the Lebanon Valley's rich agricultural history, landscape, diverse habitats and historical legacy. The proposed siting of the Williams pipeline works against such use and against our ability to carry forward our mission.
The Conservancy has concerns regarding the manner in which Williams has selected the route for its pipeline. Although much of northern and southern Lebanon County consists of state park or gamelands, and much of the Marcellus Shale gas industry’s drilling pads are located on state park or gamelands in other counties, the route through Lebanon County is located only on private property. Some of that private property consists of property which is deeded under a conservation easement - some of said land preserved via purchase utilizing federal funds; some preserved through the Conservancy via the donation of a conservation easement. Some of these lands are subject to protection under the Federal Highlands Protection Act or fall within the Kittatinny Ridge and Corridor section of the Appalachian Trail system - an internationally designated important birding area as well as a National Scenic Trail.

One such private preserved parcel is owned by a 94-year old veteran of World War II. This property currently consists of farmed land and mature forested land that are the headwaters of several streams - some of which provide and are the sources of drinking water for many of the Lebanon Valley’s residents. The property of this veteran formerly consisted of dozens of acres of additional farmed land south of State Route 443. That land was taken by the Commonwealth of Pennsylvania approximately 40 years ago for a planned reservoir that was never built due to the presence of one or more endangered animal and/or plant species in the area.

Now, at an advanced age, the veteran faces the unfortunate prospect of losing the use of yet more of the productive farmland land he has owned and worked for decades. This injury is magnified by Williams moving the proposed route across a larger portion of his property due to Williams accommodating a neighboring business property owner’s demands to move the pipeline route off that property.

Williams’ focus on utilizing preserved farmland for its pipeline route appears to disregard lawful deed restrictions and local zoning ordinances, and treats farms not as the valid business enterprises that they are but as no more than vacant land. The Conservancy cannot support the proposition that Lebanon County’s working farms are of less value than Williams’ desire to transport via a new pipeline a Pennsylvania natural resource to overseas markets.

The full impact of the Williams pipeline infrastructure project upon the Lebanon Valley is unknown at this time as Williams has not yet designated the locations or sizes of contractor and pipe yards, temporary and/or permanent access roads, other construction work spaces, meter regulator stations or main line valves. In addition, Williams has refused to fully make public the route over which it seeks to site the Central Penn Line South pipeline.

The installation of new and large pipeline in a non-corridor setting lends the potential for long and intrusive disruptions upon local infrastructure, commuting routes and existing recreational areas. In the upper Lebanon Valley, the pipeline is proposed to pass in very close proximity to an elementary school. In the Annville area, the pipeline is sited to cross the historic Quittapahilla Creek very near a massive rock quarry with
underground sections that are mined via explosive blasting. To the south, in the Lawn Village area of South Londonderry Township, the Williams pipeline is slated to string through the length of the upland sandpiper and possibly bog turtle-populated Colebrook Meadows as detailed in the Natural Areas Inventory of Lebanon County.

Given numerous reports of trespass situations by Williams personnel and/or their contractors in Lancaster, Lebanon and Schuylkill Counties, the Conservancy is not convinced that Williams will undertake sufficient efforts to minimize construction impacts upon local landowners, residents, travelers or sensitive fauna.

Many of the Lebanon Valley's agricultural operations include livestock components. Blasting thru the igneous, limestone and sandstone ridges and geologic formations throughout the Lebanon Valley carries the great risk of significantly disrupting chicken, pork and beef animals not accustomed to intrusive blasting operations. In the northern sections of the Lebanon Valley, blasting also carries the risk of opening pathways for acid mine and heavy metals drainage to enter local drinking supplies.

The Conservancy is concerned that to date, Williams submissions to FERC include no provisions for safeguarding or protecting stream headwaters or drinking water sources, with potentially negative impacts to the clean water supplies for the Pine Grove, Fort Indiantown Gap, City of Lebanon, Palmyra, Hershey, Hummelstown and Middletown areas. It should be noted that the Williams pipeline crosses numerous feeder streams into the Swatara Creek, as well as the main trunk of Swatara Creek, which drains into the Susquehanna River above where the Lancaster Water Authority pulls in water for use by residents of the City of Lancaster and surrounding environs.

The current proposed route of Central Penn Line South brings the pipeline and associated construction into the water sources of two licensed spring water outlets: the Eagle spring water dispensary in Tremont Township in the upper reaches of the Swatara Creek watershed and the Orley spring water dispensary in the Colebrook Village area of South Londonderry Township in the Conewago Creek watershed. The Conewago Creek is a federally-funded study and action area for the U.S. Environmental Protection Agency as part of the court-ordered clean up of the Chesapeake Bay. The Conservancy believes FERC lacks the jurisdiction or statutory power to overrule or supplant federal court rulings in Williams' siting of its proposed pipeline.

Because tests of Marcellus Shale gas has revealed the presence of higher than ambient level radiation, lead and other impurities, we are concerned that the rupture of a large, high pressure, single-walled underground pipeline will introduce dangerous contaminants into local drinking water as well as into the air and soil.

The Conservancy believes the local and surrounding communities of the Lebanon Valley should not be subjected to unnecessary pipeline construction when Williams has available for its use existing and operational gas pipeline corridors. If Williams is to be given approval or permitted for the construction of the intrastate Central Penn Line South pipeline infrastructure, we ask that such approval not be given prior to Williams
completing action health and safety plans in place throughout the northeast on other pipeline expansion and construction projects, including but not limited to:

* an independent air emissions baseline assessment;

* independent labs testing of water source and streams quality, with specific focus on testing for contaminants found in Marcellus Shale gas, including but not limited to ambient radiation, acid, and lead and other heavy metals levels;

* an independent comprehensive and transparent Health Impact Assessment (HIA), including but not limited to a cumulative impacts analysis;

* an independent risk assessment of a potentially catastrophic explosion of the 42" diameter high pressure pipeline and/or leak occurrence of the same pipeline;

* a full cost analysis of emergency response measures and mitigation cost measures to assist local first responders to train for sudden events related to the pipeline; and

* proof of insurance or self-insurance by Williams Partners and all of its corporate components and/or partners.

Because Williams has not undertaken any of the aforementioned analysis or assessments, nor provided proof of adequate liability and/or catastrophic events insurance, the Conservancy believes it appropriate for FERC to enact a moratorium on this project until such analysis, assessments and mitigations are fully completed and found acceptable.

In addition, because the infrastructure proposed to be constructed in the Lebanon Valley - sometimes under the threat of eminent domain by employees and/or contractors of Williams - will be located entirely within the Commonwealth of Pennsylvania, the Conservancy requests FERC to consider whether FERC is the appropriate federal and/or state agency to accept, process and rule on Williams submissions.

Respectfully submitted,

Lebanon Valley Conservancy
by its Board of Directors