

September 4, 2020

Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426

Attention: Ms. Kimberly D. Bose, Secretary

Re: El Paso Natural Gas Company, L.L.C.; Docket No. CP20-483-000 Responses to Data Request - OEP/DG2E/Gas Branch 3

Dear Ms. Bose:

On September 3, 2020, El Paso Natural Gas Company, L.L.C. ("EPNG") received a data request ("Data Request") from the Office of Energy Projects ("OEP") seeking additional environmental information pertaining to a proposed route variation on the Carlsbad South Project. Accordingly, EPNG is herein filing with Federal Energy Regulatory Commission ("Commission") its responses to the Data Request.

#### **Description of Proceeding**

On June 19, 2020, EPNG filed a prior notice request pursuant to Sections 157.205, 157.208(b), and 157.210 of the Commission's regulations under the Natural Gas Act for authorization to construct an approximate 17.1-mile sixteen-inch (16") outside diameter ("O.D.") loop line of its existing sixteen-inch (16") O.D. Line No. 3191 in Eddy County, New Mexico as well as to undertake minor appurtenant facility modifications at an existing compressor station at Lea County, New Mexico. This project is referred to as the Carlsbad South Project. At the conclusion of the notice period for the Carlsbad South Project on August 24, 2020, the project was deemed approved.

#### **Description of Information Being Filing**

EPNG is herein submitting its responses to the Data Request.

### Filing Information

EPNG is e-Filing this letter and its responses with the Commission's Secretary in accordance with the Commission's Order No. 703, *Filing Via the Internet*, guidelines issued on November 15, 2007 in Docket No. RM07-16-000.

Respectfully submitted,

EL PASO NATURAL GAS COMPANY, L.L.C.

By /s/ Francisco Tarin

Francisco Tarin Director, Regulatory

Enclosures

### **Certificate of Service**

I hereby certify that I have this day caused a copy of the foregoing documents to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding in accordance with the requirements of Section 385.2010 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure.

Dated at Colorado Springs, Colorado as of this 4<sup>th</sup> day of September 2020.

/s/ Francisco Tarin

Two North Nevada Avenue Colorado Springs, Colorado 80903 (719) 667-7517 STATE OF COLORADO

COUNTY OF EL PASO

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FRANCISCO TARIN, being first duly sworn, on oath, says that he is the Director of the Regulatory Department of El Paso Natural Gas Company, L.L.C.; that he has read the Responses filed on September 4, 2020, to the Office of Energy Projects' Data Request dated September 3, 2020 in Docket No. CP20-483-000, and that he is familiar with the contents thereof; that, as such Director, he has executed the same on behalf of said Company with full power and authority to do so; and that the matters and facts set forth therein are true to the best of his information, knowledge and belief.

Francisco Tarin Director, Regulatory

SUBSCRIBED AND SWORN TO before me, in the county of El Paso, State of Colorado this 4<sup>th</sup> day of September, 2020.

KAREN LYNN HARTLEY Notary Public - State of Colorado Notary ID 19944008440 My Commission Expires Jul 23, 2022

Karen Lynk Hartley

Notary Public, State of Colorado My Commission Expires: July 23, 2022

1. Confirm that El Paso's initial karst survey covered the area requested for the pipeline realignment variation filed August 28, 2020. Identify any karst features along the newly proposed route realignment in Eddy County, New Mexico. If karst features exist in this area, describe any such features, and explain how the pipeline could be installed taking such features into consideration.

### Response:

El Paso Natural Gas Company, L.L.C. ("El Paso") conducted its initial karst survey from September 30, 2019, to October 2, 2019. The survey included the original right-of-way and extended 100 meters (equal to approximately 328 feet) on each side of the right-ofway. Figure 1 below is an aerial view of the project area showing the proposed reroute and the karst survey track lines collected via GPS when the survey was conducted. No karst features were identified in either the original right-of-way or the proposed reroute.

### Figure 1 – Karst Survey Track lines.



Response prepared by or under the supervision of:

Mike Bonar Environmental Project Manager 719-520-4817

2. Provide a comparison of resource impacts between the approved alignment and the request modified alignment. Include, at a minimum, soils and geology, vegetation, wildlife, waterbodies, and wetlands.

#### Response:

Table 1 below compares the resource impacts between the approved alignment and the requested realignment for each requested categories. The requested realignment increases the length of the route by approximately 143 feet. This increase results in an additional 0.3 acres of impacts to riparian and Chihuahuan desert scrub/desert grassland habitat described in Table 1.

Table 1		
Resource	Impacts of Approved Alignment	Impacts of Proposed Modified Alignment
Soils	Soils on both the approved alignment and the requested realignment are located within Karro Loam, 0 to 1 percent slopes soil type. The requested realignment would impact an additional 0.3 acres of the Karro Loam soil type.	
Geology	There is no significant difference in the mineral resources, earthquakes, karst, landslides, or paleontological resources between the approved alignment and the requested realignment.	
Vegetation	No rare, threatened or endangered species were identified within the approved alignment. The vegetation on the approved alignment consists of riparian and Chihuahuan desert scrub/desert grassland.	No rare, threatened or endangered species were identified within the requested realignment. While the vegetation on the requested realignment is the same as the approved alignment, there are an additional 0.3 acres of impact.
Wildlife	No rare, threatened, or endangered species were identified within the approved alignment. The habitat on the approved alignment consists of riparian and Chihuahuan desert scrub/desert grassland.	No rare, threatened, or endangered species were identified within the requested realignment. While the habitat on the requested realignment is the same as the approved alignment, there would be an additional 0.3 acres of impact to habitat.
Wetlands and Waterbodies	There are no waterbodies or wetlands that would be impacted by the variance. The variance area was field surveyed during a mobilization for a prior alignment. The closest resources are the South Canal South and the Black River.	Similar to the approved alignment, no waterbodies or wetlands would be impacted by the requested realignment. The requested realignment is located further away from the closest resources.

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3. Indicate the distance between the new alignment and any existing pipelines. What is the current land use within the space between the alignments and how would that be modified, if at all?

#### Response:

The originally-proposed and approved alignment is 556 feet east of an existing Sendero pipeline. The proposed realignment would be located 558.5 feet east of the existing Sendero pipeline. The current land use surrounding both the approved alignment and the proposed realignment is undeveloped land. As such, the modified route would not result in any change of land use between the alignments.

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Mike Bonar Environmental Project Manager 719-520-4817