



December 14, 2018

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. CP18-332-000
Comments to the Environmental Assessment

Dear Ms. Bose:

El Paso Natural Gas Company, L.L.C. ("EPNG") is herein filing with the Federal Energy Regulatory Commission ("Commission") comments to the Environmental Assessment ("EA") issued by the Office of Energy Projects Regulation ("OEP") on November 14, 2018 pertaining to the South Mainline Expansion Project in Docket No. CP18-332-000.

Description of Proceeding

On April 27, 2018, EPNG submitted its application, pursuant to Section 7(c) of the Natural Gas Act requesting a certificate of public convenience and necessity for authorization to construct, own, and operate: 1) an approximate 17-mile 30" diameter loop line of its existing Line Nos. 1100 and 1103 between Hueco and El Paso, Texas; 2) the new Red Mountain Compressor Station in Luna County, New Mexico; and 3) the new Dragoon Compressor Station located in Cochise County, Arizona. This project is referred to as the South Mainline Expansion Project.

Comments on the EA

As part of its proposed construction and operation of the 17-mile, 30-inch outside diameter loop line to be located adjacent to its existing pipeline right-of-way ("ROW") in Hudspeth and El Paso Counties, Texas, EPNG requested a 60-foot-wide permanent ROW easement between mileposts ("MP") 174.5 and 191.5.¹ The 60-foot permanent ROW would be located south of the existing ROW for EPNG Line No. 1100.

The Commission does not agree with EPNG's proposed use of a 60-foot permanent ROW. In its EA issued on November 14, 2018, the Commission recommends that EPNG should:

¹ EPNG notes this does not include the sand dune area between MPs 188.25 and 189.00 where a 100-foot-wide ROW is required and has been recognized in the EA and the Homestead Meadows area between MPs 189.3 and 190.7 where no additional permanent ROW is proposed.

“... restrict the new permanent pipeline ROW width for the Loop Line to 25 feet immediately adjacent to its existing operational ROW and restrict the new permanent pipeline ROW width to 50 feet where the proposed loop deviates from its existing operational ROW. This permanent pipeline ROW restriction applies between approximate MPs 174.5 and 191.5, with the exception of the sand dune area between MPs 188.25 and 189.00, where a 100-foot-wide ROW is required, and the residential area between approximate MPs 189.3 and 190.7, where no additional permanent ROW is proposed.”²

The Commission rejected EPNG’s 60-foot permanent ROW request noting that EPNG did not provide justification for the additional ROW width in its application.

EPNG does not agree with the Commission’s recommendation for the 25-foot permanent ROW and believes that the 60-foot permanent ROW is appropriate for the proposed loop line between MP 174.5 and 191.5, except for the segments located between MPs 188.25 and 189.00 and MPs 189.3 and 190.7. First, EPNG is justifying its request for the 60-foot permanent ROW based on the sandy soil conditions that exist over the majority of the pipeline looping project area and EPNG’s operational/maintenance experience associated with maintaining its existing pipelines in the area. Based on the soil assessment noted in Environmental Resource Report No. 7 in EPNG’s application (See Table 7-2), starting at approximately MP 175.2 and through the remainder of the loop line route, sandy soil conditions will require additional workspace necessary to provide adequate room to shore up sides during initial trench excavation and construction, as well as when EPNG undertakes any future maintenance activities on its loop line. Securing the 60-foot permanent ROW will provide necessary distance from other pipelines in the corridor and reduce potential damages that EPNG will have to pay affected landowners during initial construction as well as future instances when EPNG is required to undertake operations and maintenance activities.

Second, prior to the issuance of the EA, EPNG had already begun to acquire ROW easements for the proposed 17-mile loop line route. In many those instances, EPNG has negotiated and purchased ROW rights that exceed the 25-foot permanent ROW. The widths of these acquisitions have been 60-feet (or greater) and all landowners have been cooperative with no requests from any of these landowners to narrow the ROW. EPNG will continue its efforts to negotiate fairly with the remaining affected landowners to obtain a 60-foot permanent ROW and try to avoid and/or minimize any use of eminent domain (should the Commission approve EPNG’s proposed project). As opposed to having a consistent 60-foot permanent ROW width, having a permanent ROW that varies in width between 60 feet and 25-feet could also lend itself to confusion in the future when EPNG undertakes operational/maintenance activities on its pipelines.

² See pp. 11-12 as well as Recommendation 12 (pp. 122) of the Commission’s EA issued on November 14, 2018.

For these reasons above, EPNG believes that a 60-foot-wide permanent ROW easement between MPs 174.5 and 191.5 (with the two segments exceptions described above) is appropriate for the operation and maintenance of its proposed 17-mile loop line. Granting EPNG the ability to secure the 60-foot permanent ROW will not affect the analysis in the EA and its conclusion that if EPNG constructs and operates the proposed facilities in accordance with the proposed construction methods and measures described in its application and supplements, as well as the OEP's recommended mitigation measures, approval of the Project would not constitute a major action significantly affecting the quality of the human environment. As such, EPNG respectfully requests the Commission reconsider its 25-foot permanent ROW limitation and authorize EPNG to use a 60-foot-wide permanent ROW easement for the construction and operation of its proposed 17-mile loop line.

Filing Information

EPNG is e-Filing this letter 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
Director, Regulatory

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 14th day of December, 2018.

/s/

Francisco Tarin

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