



January 2, 2019

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;
Supplemental Information

Dear Ms. Bose:

El Paso Natural Gas Company, L.L.C. ("EPNG") is herein filing with the Federal Energy Regulatory Commission ("Commission") supplemental information related to comments filed by the Texas Parks and Wildlife Department ("TPWD") on December 10, 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.

Description of Information Being Filed

On December 10, 2018, the TPWD filed comments in this proceeding regarding its recommendations addressing impacts from EPNG's proposed 17-mile loop line to be located in El Paso and Hudspeth Counties, Texas. In its comments to the Commission, the TPWD stated that comments provided to EPNG in May 2018 remained applicable to the project since their recommendations had not been formally addressed in the Environmental Assessment ("EA") issued by the Commission on November 14, 2018.¹

EPNG acknowledges the TPWD recommendations and agrees with the goals of such recommendations. As noted in its certificate application and subsequent informational

¹ In a letter dated May 4, 2018, the TPWD made eleven recommendations to EPNG intended to mitigate impacts to fish and wildlife resources related to the construction of EPNG's proposed 17-mile loop line in El Paso and Hudspeth Counties, Texas. EPNG submitted a copy of this letter to the Commission as part of a response to a June 8, 2018 data request filed on June 28, 2018.

filings and data request responses, EPNG will implement best management construction practices that are intended to minimize the potential for impacts to fish and wildlife resources. However, EPNG is proposing the following alternatives to four of the eleven TPWD recommendations that will achieve the same type of protections.

TPWD General Construction Recommendation No. 1:

TPWD has recommended the judicious use and placement of sediment control fence to exclude wildlife from the construction area and also recommended that any open trenches or excavation areas should be covered overnight and/or inspected every morning to ensure no wildlife species have been trapped.

EPNG's Response:

EPNG believes that using buried silt fencing in all construction areas as recommended by TPWD would be neither practical nor achieve noticeable improvements in excluding wildlife from the construction area. Consistent with the Commission's Upland Erosion Control, Revegetation and Maintenance Plan (May 2013) ("Plan"), EPNG notes that it will install sediment barriers (such as silt fence, staked hay or straw bales, compacted earth, or other appropriate materials) as a means to stop the follow of sediments and to prevent the deposition of sediments beyond approved workspaces or into sensitive resources. If there is no risk of deposition of sediments beyond approved workspaces or into sensitive resources, EPNG would not be installing sediment barriers. As such, the installation of silt fencing or other sediment barriers would not be installed the entire length of its proposed project

Similarly, the recommendation to cover all open trenches or excavation areas overnight is not realistic for a 17-mile long pipeline project. Instead relying on silt fencing or covering all open trenches or excavation areas associated with its project, EPNG formalized numerous alternative steps that are listed below (and are also addressed in Section 3.3.2 of Environmental Resource Report No. 3 of EPNG's application) that are intended to limit impacts to wildlife.

- a) Check for wildlife under vehicles and equipment that have been stationary for an hour or longer.
- b) Check trenches, excavations and uncapped pipe segments for wildlife.
- c) Limit the amount of time that trenches remain open, to the extent practicable.
- d) Maintain side slopes on hard plugs (unexcavated portion of trench).
- e) Install escape ramps and breaks in the spoil every 0.5 miles.
- f.) Leave breaks in spoil piles at least 10 feet wide approximately every 0.5 miles and at known wildlife movement corridors and/or livestock areas.
- g) Provide a gap in the welded pipe string to coincide with the hard or soft plug locations and breaks between spoil piles. This gap may be an overlap of loose pipe ends, offset to allow a 5-foot opening in the pipes, or additional skids to raise the pipe ends to a height of 4-6 feet.

EPNG notes that its construction personnel will be trained to inspect trenches and excavations each morning and prior to backfilling to ensure that no wildlife species

have been trapped. Consistent with the Plan, EPNG will provide an Environmental Inspector for each construction spread during construction and restoration activities.

TPWD General Construction Recommendation No. 2:

TPWD recommends erosion and seed/mulch stabilization materials that avoid entanglement hazards to snakes and other wildlife species. TPWD recommends the use of no-till drilling, hydromulching and/or hydroseeding to reduce the risk to wildlife.

EPNG's Response:

EPNG will recommend that its Contractor provide loosely woven, natural fiber netting that allows expansion of the mesh openings as recommended by the TPWD. As discussed in EPNG's Reclamation Plan provided in Appendix 1D of Environmental Resource Report No. 1, EPNG believes that replacing the removed topsoil and tilling, followed by drill seeding provides the most effective method for seed placement and will be used where practical on flat to moderate slopes. Broadcasting with crimping the mulch, the next most effective method for seed placement, will be used in areas where seed drilling could not be used. In addition, hydromulching will be considered in areas where appropriate. EPNG believes that reestablishing vegetation with methods that have proven success rates provides better protection of the wildlife than hydromulching and reseeding and not tilling the surface.

TPWD State Laws, Texas Horned Lizard Recommendation No. 5:

TPWD recommends that in areas that will be disturbed during active construction and project specific locations where horned lizard removal and relocation is undertaken, such areas should be fenced off to exclude horned lizard and other reptiles. TPWD further specifies that the exclusion fencing should be constructed with metal flashing or drift fence, be buried at least 6 inches deep, maintained for the life of the project and that any open trenches or excavation areas should be covered overnight.

EPNG's Response:

EPNG believes that implementation of the measures described above in response to TPWD General Construction Recommendation No. 1 (and as discussed in Section 3.3.2 of Environmental Resource Report No. 3 of EPNG's application) will adequately address TPWD's concerns to protect the Texas Horned Lizard. Thus, the installation of exclusion fencing is not necessary with such measures being implemented.

TPWD Rare Species, Black-Tailed Prairie Dog Recommendation No. 7:

TPWD recommends installing exclusion fence to keep prairie dogs from entering the project area.

EPNG's Response:

As described in its response to Recommendations 1 and 5, EPNG believes that implementation of the described measures listed above in EPNG's response to TPWD General Construction Recommendation No. 1 (and as discussed in Section 3.3.2 of Environmental Resource Report No. 3 of EPNG's application) will adequately address

