



April 15, 2019

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

Attention: Ms. Kimberly D. Bose, Secretary

Re: Sierrita Gas Pipeline LLC;
Docket Nos. CP18-37-000;
Sierrita Compressor Expansion Project;
Request for Variance Approval

Commissioners:

Sierrita Gas Pipeline LLC ("Sierrita") is hereby filing with the Federal Energy Regulatory Commission ("Commission") in Docket No. CP18-37-000 a request seeking approval for a variance related to the Sierrita Compressor Expansion Project.

Description of Proceeding

On December 21, 2017, Sierrita 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, install, and operate a new compressor ("Sierrita Compressor Station") to be located in Pima County, Arizona. The project is referred to as the "Sierrita Compressor Expansion Project."

Request for Variance

On April 9, 2019, Sierrita commenced limited construction on its Sierrita Compressor Expansion Project.¹ Upon evaluating its construction activities, Sierrita's construction contractor has requested the use of additional temporary workspace ("ATWS") at the construction site to allow crews to safely handle, maneuver and fabricate the 320-foot pipeline bypass and to provide for additional space to park construction vehicles. In compliance with Environmental Condition No. 5 of the Appendix to the Order, Sierrita is submitting a variance request for the approval to use an approximate 1.0 acres of ATWS.² The ATWS would be comprised of two 75-foot by 165-foot spaces located to the north and south of the currently approved construction work areas. Additionally, Sierrita is seeking authorization to use a 50-foot by 420-foot

¹ Sierrita initiated construction to disconnect the existing Mainline Valve 2 and pigging trap assembly located on its mainline near Milepost 1.2 and installing an approximate 320-foot pipeline bypass.

² Refer to Tab 1 for the aerial map behind this letter for the location of the requested ATWS.

ATWS located entirely along its existing permanent ROW to provide for vehicle construction parking.

The requested ATWS has been reviewed for biological and cultural resources. As noted in its environmental report, the Mainline Valve 2/pigging assembly site and the surrounding area had been previously cleared of vegetation and other potential wildlife habitats during the original installation of the Sierrita Line No. 2177.³ While the requested ATWS areas have been reseeded, the biological evaluation analysis report provided in its Environmental Report and Appendix 3A determined that no federally-listed species or habitats exist in this area. From a cultural resource standpoint, Sierrita is providing the cultural survey report and related correspondence from the Arizona State Historical Preservation Office ("AZSHPO") that assess potential cultural resource impacts at the Mainline Valve 2/pigging assembly site and surrounding areas. As noted in the report and the AZSHPO response letter, there are no historic properties to be present in the proposed ATWS areas.⁴

From a landowner perspective, the requested ATWS is located entirely on Arizona State Land Department ("ASLD") property. Sierrita has obtained approval from the ASLD to use the ATWS locations. No other landowners will be affected by this variance request. Accordingly, Sierrita respectfully requests written approval from the Director of the Office of Energy Projects for the proposed variance described in this request by April 16, 2019.

Filing Information

The cultural resource report attached under Tab 3 contains information that is privileged and confidential. Sierrita respectfully requests that the information being submitted as Non-Public be granted privileged and confidential treatment pursuant to 18 C.F.R. §388.112. Sierrita requests that the Commission accord treatment to the eFiled documents concerning privileged information in a manner consistent with Commission's regulations for the life of the assets so as not to place the assets and personnel of Sierrita at undue risk. Accordingly, Sierrita has marked the Privileged and Confidential documents with "Contains CUI//PRIV Information – Do Not Release." Please contact Mr. Francisco Tarin (telephone number 719-667-7517) at 2 North Nevada Avenue, Colorado Springs, CO 80903, regarding this request for privileged treatment.

Sierrita is e-Filing this request for a variance approval 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.

³ See Docket No. CP13-73-000; *Sierrita Gas Pipeline, LLC*, 147 FERC ¶ 61,192 (2014).

⁴ As part of this variance request, Sierrita is providing a copy of the cultural resource report and the related correspondence. The AZSHPO response letter is under Tab 2. The cultural resource report is being provided as a privileged and confidential document under Tab 3.

Federal Energy
Regulatory Commission

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April 15, 2019

Respectfully submitted,

SIERRITA GAS PIPELINE LLC

By _____/s/
Francisco Tarin
Director, Regulatory

Attachments

Certificate of Service

I hereby certify that I have this day caused a copy of the foregoing document 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 15th day of April, 2019.

/s/

Francisco Tarin

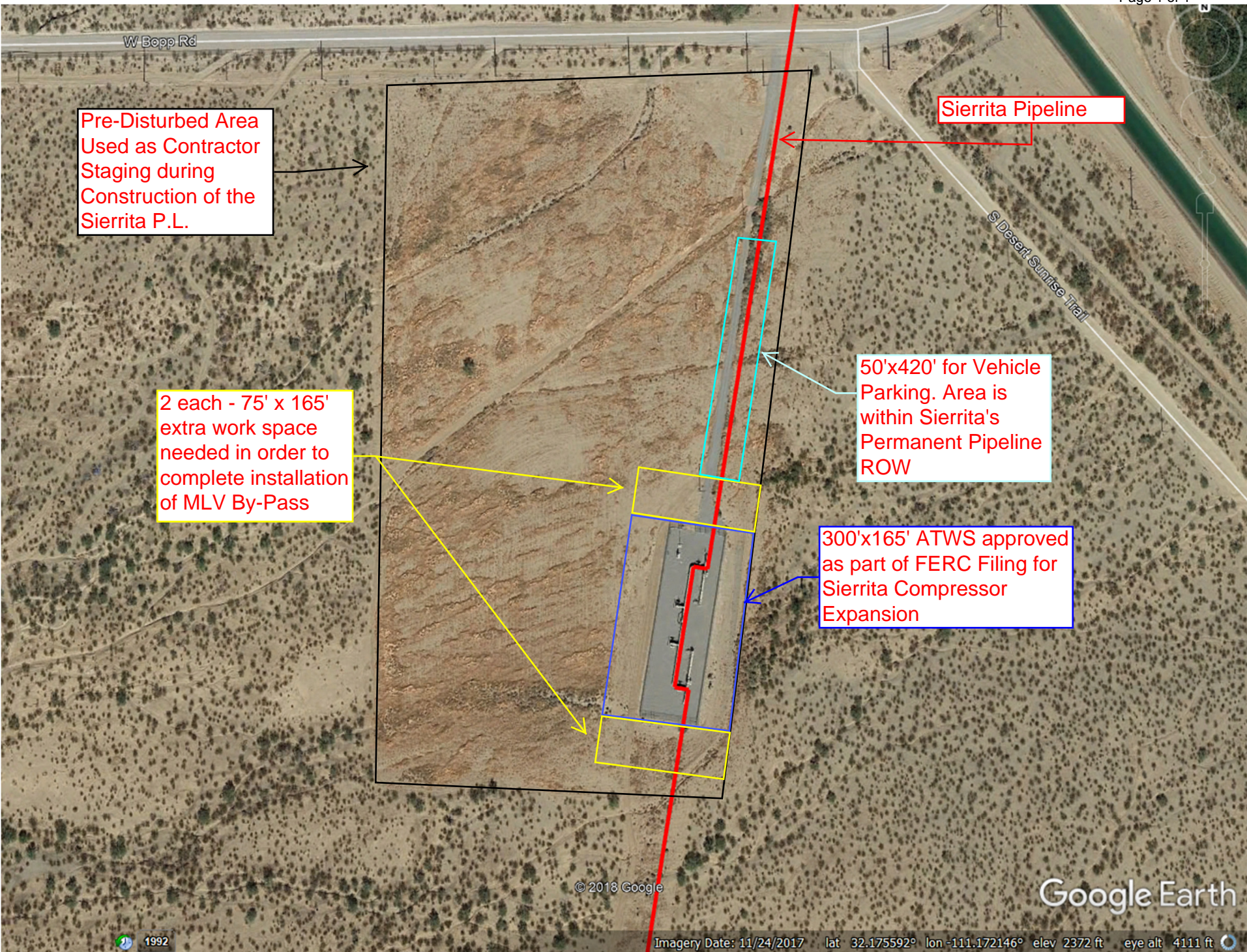
Two North Nevada Avenue
Colorado Springs, Colorado 80903
(719) 667-7517



SIERRITA COMPRESSOR EXPANSION PROJECT
DOCKET NO. CP18-37-000

Tab 1

AERIAL MAP



Pre-Disturbed Area
Used as Contractor
Staging during
Construction of the
Sierrita P.L.

Sierrita Pipeline

2 each - 75' x 165'
extra work space
needed in order to
complete installation
of MLV By-Pass

50'x420' for Vehicle
Parking. Area is
within Sierrita's
Permanent Pipeline
ROW

300'x165' ATWS approved
as part of FERC Filing for
Sierrita Compressor
Expansion

W Bopp Rd

S Desert Sunrise Trail

© 2018 Google

Google Earth

1992

Imagery Date: 11/24/2017 lat 32.175592° lon -111.172146° elev 2372 ft eye alt 4111 ft



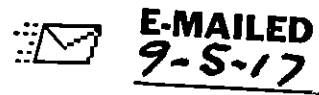
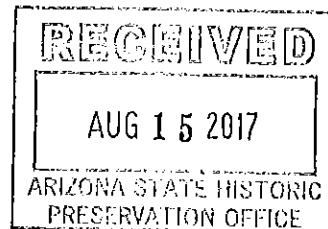
SIERRITA COMPRESSOR EXPANSION PROJECT
DOCKET NO. CP18-37-000

Tab 2

AZSHPO RESPONSE LETTER



343 West Franklin Street
Tucson, Arizona 85701
Tel 520.325.9194 Fax 520.325.2033
www.swca.com



August 11, 2017

Kathryn Leonard
Arizona State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
Phoenix, Arizona 85007

Re: Sierrita Gas Pipeline, L.L.C., Sierrita Compressor Station Project, Pima County, Arizona/Section 106 Review

Dear Ms. Leonard:

On behalf of Sierrita Gas Pipeline, L.L.C. (Sierrita), SWCA Environmental Consultants (SWCA) is submitting project information regarding the proposed Sierrita Compressor Station Project (Project) located in Pima County, Arizona. Specifically, the Project would increase the transport capacity of the existing Sierrita Pipeline (Line 2177) and meet the demands for increased natural volumes of gas from its customers. The undertaking would be authorized by the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act, and would constitute a federal undertaking subject to review under Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations (36 Code of Federal Regulations [CFR] 800).

Sierrita intends to file its application with the FERC in about 5 months. In the meantime, Sierrita is providing the following information to support the FERC's Section 106 review responsibilities. Consulting parties in the Section 106 review include the State Historic Preservation Office (SHPO), Arizona State Museum (on behalf of the Arizona Board of Regents), the City of Tucson, Pima County, and the following Native American tribes: Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, and Yavapai-Apache Nation.

Project Description and Area of Potential Effects (APE)

The Project includes a 10-acre compressor station site, about 1,000 feet of suction and discharge lines connecting the new compressor station to the existing Line 2177 at Mile Post (MP) 6.5, and new aboveground piggings and valve facilities where the suction and discharge lines would tie into Line 2177. The 10-acre site is land recently purchased by Sierrita from the Arizona Board of Regents (ABOR). The suction and discharge lines would be placed in a new right-of-way (ROW) across lands owned by the ABOR. The new aboveground facilities at the Line 2177 tie-in would be within Sierrita's existing ROW on land owned by the ABOR. An existing dirt road between State Route (SR) 87 and the proposed compressor station site would be used for vehicle access during and after project construction. The total area needed for construction of the above-described facilities, including the access road, is 14 acres.



Additionally, the Project entails the removal of existing facilities (Mainline Valve 2 and pigging facilities) at MP 1.2 along Line 2177, as well as the installation of additional aboveground metering equipment at the existing San Joaquin meter station at MP 0.2. This work would take place within Sierrita's existing ROW.

The APE for direct effects is the 14-acre area where new ground-disturbing construction and use of the existing access road are proposed. The APE for indirect effects is a 0.25-mile radius around the APE for direct effects. The removal of existing facilities at MP 1.2 and the installation of additional metering equipment at MP 0.2 is not considered part of the APE for the current project, as study of these areas in support of the construction of Line 2177 (FERC Docket No. CP13-73-000; SHPO No. 2012-0465) determined no historic properties to be present.

Cultural Resources Survey

Sierrita retained SWCA to conduct a cultural resources survey and prepare a report in support of the Section 106 review. SWCA conducted a pedestrian survey of the 14-acre APE for direct effects, and a records search which included the APE for indirect effects. No historic properties (properties listed in or eligible for listing in the National Register of Historic Places [NRHP]) were found in the APE for direct effects. One historic property was identified within the project area for indirect effects. This property is the in-use alignment of the historic-era SR 87. The road has been determined eligible for listing in the NRHP for its association with Arizona's historic highway system. The construction and operation of the Project will not affect the characteristics that make the road historically significant.

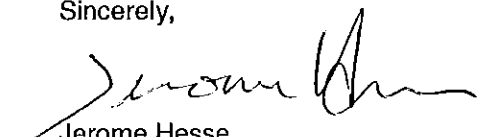
Recommendation of Effects and Unanticipated Discovery Plan

Accompanying this letter, please find the following: 1) a project map, 2) SWCA's cultural resources survey report, and 3) an Unanticipated Discoveries Plan (UDP) for use during project construction. **We request your review of these documents, and concurrence with the adequacy of these documents and the recommended finding of *No Historic Properties Affected*.**

Comments generated by this Section 106 outreach will be included in the cultural resources information that Sierrita will file with the FERC. This information will be intended to assist FERC staff in its Section 106 review responsibilities.

Should you have any questions, please do not hesitate to contact me (jhesse@swca.com or 520-325-9194 ext. 4912).

Sincerely,


Jerome Hesse
Principal Investigator, SWCA

No Historic Properties Affected


Arizona State Historic Preservation Office
Arizona State Parks Board

Enclosures: Project location map
Cultural Resources Survey Report
Unanticipated Discovery Plan

cc: Michael Bonar (Sierrita)