

NEW JERSEY CHAPTER

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September 10, 2014

Via Electronic Mail: efiling@ferc.gov Kimberly D. Bose, Secretary Federal Energy Regulatory Commission 888 First Street, NE, Room 1A Washington, D.C. 20246

RE: Comments on the Environmental Assessment of the Leidy Southeast Extension Project, FERC Docket No. CP13-551-000

Dear Secretary Bose:

The New Jersey Chapter of the Sierra Club submits additional comments on the Leidy Southeast Extension Project, based on the announcement by Transco of the Diamond East project on August 26, 2014. The proposed Diamond East Project would expand capacity on the same line, in the same region, as the Leidy Southeast Project.¹ This is the exact type of project segmentation that federal courts stated violated NEPA in *Delaware Riverkeeper vs. FERC*. These two projects are virtually the same and will impact the same communities. Transco's segmentation ensures FERC will fail to assess the cumulative impacts that the construction of each separate pipeline loop will have throughout the region.

This announcement proves that Transco is deliberately bifurcating the approval process to avoid FERC's review of the cumulative impacts of the project in its entirety. This is a violation of NEPA.

This announcement by Transco necessitates an Environmental Impact Statement for the Leidy Southeast Expansion line to determine the secondary and cumulative impacts of this proposal and the Diamond East project to ensure NEPA is not violated.

Thanks you for considering these comments.

Sincerely,

¹ Fisher, Joe. "**1 Bcf/d Transco Expansion Would Take Marcellus Gas to Northeast**". <u>Natural Gas</u> Intel. 26 Aug 2014. http://www.naturalgasintel.com/articles/99500-bcfd-transco-expansion-would-take-marcellus-gas-to-northeast



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Jeff Tittel

Director, New Jersey Chapter of the Sierra Club