



April 30, 2021

Via Electronic eFiling Submission

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Docket Number CP21-94-000

Dear Secretary Bose,

On behalf of Sierra Club and its approximately 3.8 million members and supporters, we submit the following comments in response to Transcontinental Gas Pipe Line Company, LLC's Notice of Application for its Regional Energy Access Expansion (REAE) Project and request that the Federal Energy Regulatory Commission (FERC) reject this application.

First and foremost, we are concerned that the public comment period is too short. The application includes seventy large files with thousands of pages of documentation. This project will impact many people in New Jersey and Pennsylvania. These people need a chance to review the application and submit meaningful comments. The initial application was submitted with FERC on March 28, the Notice of Application for this project was issued on April 9, and public comments were due on April 30. A little over thirty days from when the application was submitted and only twenty-one days from when the application was noticed to the public is not enough time to provide the public to review these large files and extensive documentation. We are requesting that FERC extend the public comment deadline by at least sixty days to give the public appropriate time to review the application and submit comments.

Second, the Sierra Club would like to express its opposition to the REAE project. The Sierra Club is opposed to the project because it will exacerbate climate change and impact the safety, health, and well-being of communities and environmental resources in New Jersey and Pennsylvania. The Biden Administration has made a commitment to reduce our greenhouse gas (GHG) emissions 50% below 2005 levels by 2030. Approving this pipeline would go directly against this commitment by locking in a dirty fuel source for the affected communities for several decades, helping ensure these communities *do not* lower their GHG emissions. For similar reasons, the REAE project is not consistent with President Biden's Executive Order 13990, Protecting Public Health and the Environment and Restoring Science to Tackle the Climate

Crisis. EO 13990 declares that it is “the policy of [the Biden] Administration to listen to the science” and to “reduce greenhouse gas emissions.” Approving this project would be ignoring the science to increase GHG emissions.

The REAE project also goes against state commitments to reduce greenhouse gas emissions and address climate impacts. New Jersey and Pennsylvania have both committed to 80% reductions in GHG emissions by 2050. Building more pipelines and expanding compressor stations will increase the country’s greenhouse gas emissions. Constructing outdated energy infrastructure will keep the region locked in the past and unable to move forward with renewable energy. We request that FERC prepare the country for the future by not allowing expansion projects associated with such energy systems.

This project involves expanding five existing compress stations by adding gas-fired compressors. This includes three stations in Pennsylvania and two stations in New Jersey. It would also include building a new gas-fired compressor station in West Deptford, New Jersey. This is concerning because compressor stations release toxic chemicals into nearby air and water. Compressor stations experience both scheduled and unscheduled blowdowns which release methane, ethane, methyl tert-butyl ethers (MTBEs) and other chemicals into the air. Other pollutants that have come from compressor stations include formaldehyde, propane, isobutene, cyclohexane, benzene, toluene, and other greenhouse gasses. High levels of these chemicals that come out of the compressor station via air and water pollution can directly affect public health, especially during construction. Further, the pipeline transporting the additional gas that this project will allow for is more likely to suffer “fugitive emissions” from leaks. These fugitive emissions, mostly methane, will pollute the communities the pipeline travels through and increase regional GHG emissions. The emissions will only get worse over time.

This project will also encourage more fracking in Pennsylvania, which has been proven to lead to serious health impacts to people living nearby. Harmful chemicals like benzene, butylcyclohexane, ethylbenzene, styrene, and toluene have been found in the bodies of children living near fracking wells at levels up to ninety-one times as high as the average American. These chemicals cause a variety of health problems, including skin and respiratory irritation, organ damage, and increased cancer risk. Building more fracked gas infrastructure in this part of the country will only result in more health impacts to the families living near these wellpads in Pennsylvania.

Williams pinpoints Luzerne, Monroe, York, and Chester counties in Pennsylvania and Gloucester, Somerset, and Middlesex counties in New Jersey as areas where it will expand its transport of fracked gas through existing pipelines. It is important to note that these expansions affect a large number of towns within these counties. We request that Williams be required to connect all of the dots on the map and notify every affected town. Residents must be provided notice of Williams’ intent to send increased amounts of volatile gas at higher pressure through existing pipes that go through dense neighborhoods and pass near schools, businesses, and homes.

Williams further seems to be misleading FERC and the public by implying that constructing gas infrastructure will benefit the environment as customers switch from coal. But Williams does not consider that this gas will be displacing not coal, which is already on its way out, but the clean energy that would replace this coal. This pipeline would in reality replace solar, wind or geothermal energy. FERC should reject the pipeline in favor of these renewable energy sources.

This project would also likely interact with other proposed Williams Transco projects moving forward in the area, including its proposed Northeast Supply Enhancement Project (NESE). These projects together will have cumulative and secondary impacts greater than the sum total of the projects if they were considered separately. The combined negative cumulative impact of all the Williams Transco projects provides yet another reason why FERC should reject the REAE.

Finally, Williams claims that the REA Expansion Project will support hydrogen and Renewable Natural Gas (RNG) blending. However, this does not make this project any cleaner. RNG is a dirty fuel made from waste methane from landfills, sewage treatment plants, and livestock manure. It still releases greenhouse gases and exacerbates water and air pollution impacts in nearby communities. It can also result in methane leakage throughout the distribution process, which leads to increased emissions. Second, even if the project is able to transport hydrogen, it is very unlikely such transport would occur, because hydrogen is not cost-effective. There is no economically-viable scenario that would include shipping hydrogen through this pipeline. Therefore, this project will still increase greenhouse gas emissions, promote damaging fracking activities that endanger public health and the environment, and undermine our country's progress when it comes to renewable energy even if it uses RNG blending and is technically able to transport hydrogen.

For the reasons detailed above, we request that FERC reject this unnecessary proposal and not allow it to move forward.

Respectfully submitted,

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