



*national fuel*

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January 11, 2016

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

Re: National Fuel Gas Supply Corporation and Empire Pipeline, Inc.  
Northern Access 2016 Project  
Docket Nos. CP15-115-000 and CP15-115-001

Dear Ms. Bose:

National Fuel Gas Supply Corporation and Empire Pipeline, Inc. (collectively, “National Fuel”) hereby submit their responses to comments submitted from October 24, 2015 to November 20, 2015. Similar to National Fuel’s August 13, 2015, September 18, 2015 and October 30, 2015 Comment Responses, National Fuel reviewed each comment submitted during the aforementioned comment period, similar comments were grouped together and comment summaries were developed with respect to new and previously unaddressed substantive issues/concerns.

National Fuel responds to each of these comment summaries in the attached document in comment/response format. National Fuel’s responses are based on the pipeline route and facilities in National Fuel’s March 17, 2015 certificate application, as updated by National Fuel’s August 31, 2015 supplemental environmental data request response concerning above-ground facilities, and as updated in National Fuel’s November 2, 2015 Amendment to Joint Abbreviated Application.

Please contact the undersigned if you have questions concerning this filing.

Very truly yours,

*/s/ Kenneth Webster*

Kenneth Webster  
Attorney  
National Fuel Gas Supply Corporation and  
Empire Pipeline, Inc.

Enc.

cc: Christine Allen

CERTIFICATE OF SERVICE

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I hereby certify that I have this day served, in accordance with the provisions of Rule 2010 of the Commission's Rules of Practice and Procedure, the foregoing document upon each person designated on the official service list compiled by the Secretary of the Commission in this proceeding.

Dated at Williamsville, New York this 11th day of January, 2016.

/s/ Matthew J. Luzzi

Matthew J. Luzzi  
National Fuel Gas Supply Corp.  
6363 Main Street  
Williamsville, New York 14221  
Telephone No. (716) 857-7813

**Comments / Responses**

October 24, 2015 to November 20, 2015

1. Concern as to whether the compressors for the proposed Pendleton Compressor Station are American made.

**Response:** The turbine compressor packages for the Pendleton Compressor Station are made by Solar Turbines, a Caterpillar Company located in San Diego, California.

2. Concern about which roads will be used for truck and equipment traffic to and from the site of the proposed Pendleton Compressor Station.

**Response:** National Fuel developed a Transportation Plan for the Northern Access 2016 project, which includes the proposed Pendleton Compressor Station, and has been provided to the Town of Pendleton Planning Board and Highway Department for review and comment.

3. Concern that construction of the proposed Pendleton Compressor Station may cause damage to property of nearby property owners, and as to whether property owners will be compensated as result of any such damage.

**Response:** Construction activities for the proposed Pendleton Compressor Station will be contained within the limits of disturbance (LOD) submitted as part of National Fuel's Amendment to its FERC Application, all of which will be within the 20 acre Killian Road site. As all work for the proposed Pendleton Compressor Station will be completed within the Killian Road site footprint, no damage is expected with respect to any nearby properties.

4. Concern that the Solar Taurus 70 Turbine compressors proposed for the project are relatively new technology, and therefore do not have enough proven reliability in the field.

**Response:** Solar Turbines is a industry leader in industrial turbines under 25,000 HP, with nearly 14,000 units installed for power generation, marine propulsion and the production, processing and transmission of natural gas. Since the introduction of their first unit in 1960, Solar manufactured turbines have logged approximately 1 billion hours of operation performing these services. The Taurus 70 was introduced in 1993.

5. Concern as to whether there are delineated wetlands within the proposed Pendleton Compressor Station site.

**Response:** The Project site and adjacent property to the east, totaling approximately 40 acres, was surveyed by a local certified wetland delineation firm and a total of

1.33+/- acres of wetlands was identified in a wooded area in the southwest corner and along the western boundary of the Project's proposed 20 acre site. The wetlands are in a wooded area that will not be disturbed by the site construction. The U.S. Army Corps of Engineers conducted an onsite Jurisdictional Determination (JD), and with some verification testing, determined the delineation survey was accurately conducted.

6. Concern that Chromium-6 may be present in the paint and coating applied during the original installation of the XM-10 pipeline, metering station and odorization facilities.

**Response:** Chromium-6 is not a component of the paint and coating used for current applications, nor was it applied during the original installation of the XM-10 pipeline, metering station and odorization facilities. In addition, Chromium-6 was not a component of the paint and coating applied during the lifetime of the station facilities for maintenance.

7. Concern whether TransCanada Pipelines applies a transportation charge for sending gas through its system and, if so, that such charge is passed to local consumers.

**Response:** The incremental costs associated with the facilities for the Northern Access 2016 project are borne by the shipper (customer) of the project, through the rate charged to that customer for the transportation services it has contracted for. Existing customers of Empire, including local gas utilities that serve western New York will not be allocated these costs.

8. Concern as to whether emission requirements will be maintained during unusual climate conditions and subzero temperatures.

**Response:** The proposed Pendleton Compressor Station Solar Taurus 70 turbines are subject to the emissions standards of 40 CFR 60, Subpart KKKK, and therefore must meet the 150 ppm NO<sub>x</sub> emissions limit for turbines "operating at temperatures less than 0°F". The Solar Turbines base NO<sub>x</sub> emissions warrantee of 120 ppm for turbines operating at temperatures less than 0°F adequately achieves this standard. In addition, National Fuel has committed to utilizing Solar Turbine's Cold Ambient Fuel Logic Control technology to further reduce NO<sub>x</sub> emissions during these conditions to 42 ppm; well below the required Subpart KKKK limit.

Additionally, publicly available meteorological data from the National Weather Service indicates that February 2015 was one of the coldest months on record for the region and therefore is not representative of normal ambient conditions. The actual number of hours with ambient temperatures less than 0°F annually is very limited based on historical data and any resultant emissions increase during these hours is not expected to contravene applicable emissions standards.

National Fuel is also required as part of the Federal Energy Regulatory Commission (FERC) approval process and New York State Department of Environmental Conservation (NYSDEC) Air Permitting process to demonstrate compliance with the 1-hr NO<sub>2</sub> National Ambient Air Quality Standard (NAAQS) at and beyond the facility fence-line. Compliance with the NAAQS is demonstrated through air dispersion modeling using an Environmental Protection Agency (EPA) developed program and implemented in accordance with EPA and NYSDEC guidelines.

9. Concern as to whether the concrete foundation supporting the compressor engines for the proposed Pendleton Compressor Station will remain stable during seasonal freezing and thawing.

**Response:** Empire uses engineered screw pile foundations to support its compressor packages. These screw piles are designed and installed to a specific tension capacity below the frost depth to resist frost heaving.

10. Concern as to whether the compressor station will have a drainage system to collect and test rainwater runoff before release.

**Response:** The Project site will have two large dry ponds that will control the water runoff from the site and will be designed using the New York State Stormwater Management Design Manual. The dry extended detention ponds (a.k.a. dry ponds, extended detention basins, detention ponds, extended detention ponds) are basins designed to detain runoff for some minimum time. Dry detention ponds are used for water quantity control and can also be used to provide flood control by including additional flood detention storage. Infiltration and evaporation also helps control the water levels.

11. Concern as to whether there will be a septic system within the proposed Pendleton Compressor Station site or if the proposed facilities will connect to the Town of Pendleton's wastewater disposal system.

**Response:** Empire has proposed a septic tank location in its Stormwater Pollution Prevention Plan package, which has been submitted to the Town of Pendleton's stormwater management officer.

12. Concern as to whether the construction of the proposed Pendleton Compressor Station will impact the Town of Pendleton's plan to construct a park and convert an abandoned railroad line into a bicycle path near the proposed compressor station site.

**Response:** The development of the Pendleton Compressor Station does not utilize land where the Town has potential plans to develop a park (on property located off of

Beach Ridge Road) or a bicycle path (on an abandoned rail grade). Both are located, at their closest point, on adjacent parcels. In addition, the design of all facilities in Pendleton (pipeline and compressor station) will be designed and constructed to US DOT 192 safety code standards for Class 3 locations. That standard incorporates elevated safety factors determined to be appropriate for densely populated residential development, and areas where people congregate such as parks, schools, churches, etc.

13. Concern as to whether Empire may lease, rather than purchase, the Killian Road site for the proposed Pendleton Compressor Station.

**Response:** Empire has secured an option to purchase an approximately 20-acre industrially-zoned parcel on Killian Road, in the Town of Pendleton, New York, and will complete a fee simple purchase of the land.

14. Concern about the storage of odorant at the proposed Pendleton Compressor Station.

**Response:** There will be no bulk storage tanks located at the Pendleton Compressor Station. The current odorant facility, which will be removed as part of this Project, located off of Aiken Road, has a 5,000 gallon bulk odorant storage tank, as the direction of gas flow was from Empire to Supply, and odorant injection is required in that flow direction. The proposed new odorant facility located at the Pendleton Compressor Station is a state-of-the-art facility housed entirely within the meter and regulation building and within its own enclosure. Its design and the change in predominate flow direction eliminates the need for a large bulk odorant storage tank, and instead relies on a 500 gallon “day tank” located within the device housing.

15. Concern regarding the level of detail included in Empire’s alternate site analysis conducted with respect to the Cambria, New York alternative compressor station site.

**Response:** As with all other alternative sites considered for the proposed compressor station, Empire completed a desktop review concerning the Cambria alternative site, which allowed an apples to apples comparison between the Cambria alternative and the other respective sites. This desktop review demonstrated that the Cambria alternative site would result in significant incremental environmental impacts (as detailed in National Fuel’s prior comment responses) when compared to Empire’s preferred site. Once Empire identified its preferred site for the proposed compressor station (based on its review of the various alternatives) -- both with respect to the original preferred site (adjacent to Aiken) and the new preferred site (adjacent to Killian Road), as well as the Wheatfield dehydration station site (also considered as the Wheatfield alternative compressor station site) -- Empire completed further detailed wetland delineation studies and related onsite environmental review.