



national fuel

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June 22, 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 February 5, 2016 to June 22, 2016. Similar to National Fuel's previous Comment Responses, National Fuel reviewed each comment submitted during the aforementioned comment period, 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 further 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

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 22nd day of June, 2016.

/s/ Matthew J. Luzi

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

Comments / Responses

February 5, 2016 to June 22, 2016

1. Statement that the Wheatfield Dehydration Facility (Facility) will operate two dehydrators in continuous operation, but the data analysis provided in Empire's New York State Department of Environmental Conservation (NYSDEC) air permit application (Application) is based on one dehydrator operating for a maximum of 48 hours during the year. Statement that the Facility includes a storage tank, but the Application does not provide information about its ability to withstand extreme weather and how often the tank will be emptied.

Response: Facility air permits in New York State are issued based on a proposed facility's "Potential-to-Emit" (PTE) emissions. PTE emissions are computed based on a proposed facility operating at maximum capacity for all hours of the year in order to represent worst-case annual emissions. PTE emissions for the proposed Wheatfield Dehydration Facility were calculated assuming that the two (2) proposed dehydrators will each operate at maximum capacity for 8,760 hours per year. NYSDEC will review the PTE emissions calculations and issue, or decline to issue, an air permit based on the PTE emissions values and other information presented in the Application. The Projected Actual Emissions presented in Attachment B to the Application are included to demonstrate the anticipated actual impacts from the proposed facility and not as a criterion for permit issuance in the NYSDEC's Application review process.

The 1,000 gallon above ground storage tank will be designed, constructed and installed in accordance to UL-142 standards, with a steel dike for secondary containment. The tank design temperature is -20 deg. F to 200 deg. F. The tank will be emptied as needed. Tank levels will be continuously monitored with electronic sensors and inspected per NYSDEC Regulations. Due to stringent quality standards for gas being transported on its transmission pipeline system, Empire anticipates little, if any, pipeline condensate being filtered from the gas stream and stored for ultimate disposal.

2. Concern regarding the amount of Lost and Accounted for Gas (LAUF) reported by Empire in its Annual Report.

Response: Empire Pipeline, Inc. is committed to operating a safe and reliable pipeline network. As filed in its Annual Report, required by 49 CFR §191 to be submitted to the U.S. Department of Transportation, Empire had no leaks, failures, or incidents during calendar year 2015. Empire has developed and follows a comprehensive leak survey plan and cathodic protection program. If any leak were to be found along the pipeline, it would be repaired immediately.

The reported LAUF gas is likely the result of accuracy tolerance in measurement. When compared against the measured quantities, the LAUF quantity represents a 0.06% difference. To put this percentage into perspective, measurement calibration uncertainty at state-of-the-art laboratories utilized by Empire and other pipelines range from 0.19% to 0.25%.

Document Content(s)

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