

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PennEast Pipeline Company, LLC) **Docket No. CP15-558-000**
PennEast Pipeline Project)

PENNFUTURE’S MOTION FOR LEAVE TO INTERVENE

Pursuant to 18 C.F.R. §§ 385.212 and 385.214, Citizens for Pennsylvania’s Future (PennFuture), through its undersigned attorney, respectfully moves to intervene in the matter captioned above.

In support of its motion, and pursuant to 18 C.F.R. § 385.214, PennFuture respectfully submits the following:

I. Statement of Interest

PennFuture is an environmental public interest organization whose activities include legal and legislative advocacy on a state and federal level; providing education for the public; and assisting citizens in public advocacy. PennFuture has members who live, work, and recreate throughout Pennsylvania, including in the vicinity of the PennEast Pipeline Project (Project).

According to the information submitted by PennEast Pipeline Company, LLC (PennEast) with its September 24, 2015 application for certificates of public convenience and necessity and related authorizations, the Project will include the construction of approximately 114 miles of pipeline, a significant portion of which will run through Pennsylvania. This length of pipeline, along with the facilities

appurtenant to it, will result in numerous environmental impacts that must be considered by the Commission when making a decision on PennEast's application. *South Coast Air Quality Management District v. FERC*, 621 F.3d 1085 (9th Cir., 2010). These impacts will affect areas where PennFuture's members reside, work and recreate. As such, PennFuture and its members have an interest that may be directly affected by the outcome of this proceeding, as required by 18 C.F.R. § 385.214.

As described in its February 27, 2015 scoping comment letter, PennFuture is interested in preventing or minimizing the environmental degradation that would result from the Project. Among other things, PennFuture is interested in:

- Methane emissions- The transmission of natural gas through pipelines often results in the release of methane, a potent greenhouse gas, to the environment. PennFuture is interested in ensuring that these emissions are minimized.
- Forest fragmentation- Clearing previously wooded sections in the interior of a forest changes the nature and composition of forest ecosystems by exposing a wider area to light and changing the temperature and humidity at the edge of the forest. Increased forest fragmentation reduces core forest habitat and increases edge forest habitat, which can have negative effects on wildlife and ecosystems. PennFuture has an interest in preventing and minimizing forest fragmentation.

- Preservation of public lands- Pennsylvania has an extensive system of state parks, forests, and game lands that have been set aside for the benefit of all Pennsylvanians, present and future. PA. CONST. art. I, § 27. These lands should be protected from the adverse effects of natural gas extraction and infrastructure.
- Protection of Water Resources – According to the 2010 Pennsylvania Integrated Water Quality Monitoring Report, Pennsylvania has 84,867 miles of streams and rivers, 80 percent of which have attained their Aquatic Life Use Designation. The Project will require construction activities to occur near, in, and through numerous streams in Pennsylvania, including those designated High Quality an Exceptional Value. The increased pollution loading from the Project threatens the ability of Pennsylvania streams to maintain those standards currently being met, and threatens to prevent streams from achieving those standards currently not being met.

By intervening in this docket, PennFuture seeks to advance the public interest by advocating for the citizens of Pennsylvania and the natural resources of the Commonwealth.

PennFuture reserves the right to supplement this filing after it has had an opportunity to review, in more detail, PennEast’s application for certificate of public convenience.

II. Communications

All communications, pleadings, and orders with respect to this proceeding should be sent to the following:

Michael Helbing, Esq.
PennFuture
8 West Market Street, Suite 901
Wilkes-Barre, PA 18701
Phone: (570) 208-4007
Email: helbing@pennfuture.org

III. Conclusion

Wherefore, PennFuture respectfully requests that the Commission grant its motion to intervene.

Respectfully Submitted,

s/ Michael D. Helbing

Michael D. Helbing, Esq.
PA Attorney ID No. 209177
PennFuture
8 West Market Street, Suite 901
Wilkes-Barre, PA 18701
Phone: (570) 208-4007
Email: helbing@pennfuture.org

Dated: October 29, 2015