



CONSTITUTION PIPELINE

**Constitution Pipeline Company, LLC**

2800 Post Oak Boulevard (77056)  
P.O. Box 1396  
Houston, Texas 77251-1396  
713/215-2000

April 5, 2012

Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Attention: Kimberly D. Bose, Secretary

Reference: Request for Pre-Filing Review  
Constitution Pipeline Company, LLC  
PF12-

Ladies and Gentlemen:

Constitution Pipeline Company, LLC (“Constitution”) respectfully requests that the Federal Energy Regulatory Commission (“Commission”) Staff initiate a pre-filing review of its proposed natural gas pipeline project (sometimes referred to herein as the “Project”). The Project is a new interstate gas pipeline that will be designed to transport 650,000 dekatherms per day of natural gas from Susquehanna County, Pennsylvania, to points of interconnection with Iroquois Gas Transmission at the Wright Compressor Station and with Tennessee Gas Pipeline, both located in Schoharie County, New York. The Project will involve the construction of approximately 121 miles of 30-inch pipeline, one greenfield compressor station, four meter stations, valves, piping, and appurtenant facilities.

In accordance with Section 157.21(d) of the Commission’s regulations, Constitution submits the following:

- 1. A description of the schedule desired for the project including the expected application filing date and the desired date for Commission approval.**

Constitution requests approval to commence the pre-filing process by April 18, 2012. During the pre-filing process, Constitution will conduct field surveys for cultural

resources, wetlands, and endangered species to identify and address significant issues, and will meet with regulatory agencies and seek landowner input. Constitution will develop complete Resource Reports and expects to use a third-party contractor to prepare a draft environmental document.

Constitution held an Open Season for the Project from February 21 through March 12, 2012. Constitution expects to submit a full draft of Resource Reports 1 and 10 and a list of affected landowners in May 2012. Constitution anticipates filing its NGA Section 7(c) certificate application in January 2013. The application will request that the Commission approve the Project by November 2013. Approval by this date will allow Constitution to take into account and work around the spring migratory bird nesting season and Indiana bat roosting season. This will enable Constitution to complete the proposed facilities and commence service for the Project by March 2015. Constitution anticipates resolving the issues raised during the scoping process, allowing the Commission staff to issue a final environmental document for the project by October 2013. The proposed Project timeline is as follows:

April 2012	Pre-filing process begins
July 2012	Open Houses
January 2013	Submit 7(c) Application
November 2013	Requested Date for FERC Final Order
January 2014	Anticipated Start of Right-of-Way Clearing
April 2014	Anticipated Start of Mainline Construction
March 2015	Target In-Service

Constitution is seeking to use the Commission-approved pre-filing process in order to develop its certificate application and obtain timely processing of the certificate application. In that regard, Constitution will provide to Commission Staff the information set forth in Section 157.21(f) of the Commission's regulations.

**2. For LNG terminal facilities, a description of the zoning and availability of the proposed site and marine facility location.**

There are no LNG terminal facilities related to or proposed as part of the Project.

**3. For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, an explanation of why the prospective applicant is requesting to use the pre-filing process under this section.**

The Commission Staff's early review of the environmental documentation and its involvement in Constitution's public participation plan will allow Constitution, interested stakeholders, and the Commission Staff to discuss and address routing, siting, and other environmental issues before developing and filing the certificate application for the

Project. In particular, Constitution believes that the pre-filing process will be beneficial in the following ways:

- Facilitating issue identification, study needs, and issue resolution;
- Conducting site visits, examining alternatives, meeting with agencies and stakeholders, and participating in the public information meetings (open houses);
- Issuing a scoping notice and conducting scoping for the Project; and
- Assisting in the review and comment on the Resource Reports comprising Constitution's draft Environmental Reports prior to filing, to ensure that the Commission's filing requirements are satisfied and that all of the information needed to complete the environmental document is included.

**4. A detailed description of the project, including location maps and plot plans to scale showing all major plant components, that will serve as the initial discussion point for stakeholder review.**

The Project will provide transportation of 650,000 dekatherms per day of natural gas production from Susquehanna County, Pennsylvania, to the Iroquois Gas Transmission and Tennessee Gas Pipeline systems in Schoharie County, New York.

More specifically, the Project facilities include:

- Approximately 121 miles of 30-inch pipeline from Williams Field Services Company, LLC's planned "Central Station" and a second receipt point, both located in Susquehanna County, Pennsylvania, to points of interconnection with Iroquois Gas Transmission at the Wright Compressor Station and with Tennessee Gas Pipeline, both located in Schoharie County, New York;
- A 32,000 horsepower (ISO) gas turbine-driven compressor station in Schoharie County, New York;
- Receipt and delivery meter stations in Pennsylvania and New York; and
- Appurtenant underground and aboveground facilities.

The general location of the proposed facilities is illustrated on the attached map.

**5. A list of the relevant federal and state agencies in the project area with permitting requirements. For LNG terminal facilities, the list shall identify the agency designated by the governor of the state in which the project will be located to consult with the Commission regarding state and local safety considerations. The filing shall include a statement indicating:**

- (i) That those agencies are aware of the prospective applicant's intention to use the pre-filing process (including contact names and telephone numbers);
- (ii) Whether the agencies have agreed to participate in the process;

- (iii) How the applicant has accounted for agency schedules for issuance of federal authorizations; and**
- (iv) When the applicant proposes to file with these agencies for their respective permits or other authorizations.**

Constitution has contacted federal and state agencies regarding the Project to introduce the Commission's pre-filing process and ask the agencies to participate in the process. Please refer to the attached *Initial Regulatory Contacts* table, which identifies the agencies that have been contacted regarding the pre-filing process and the results of those consultations. Constitution has incorporated into its overall project schedule the agency-specific schedules for issuance of required federal authorizations and expects to receive these federal and state authorizations prior to the start of construction. Constitution expects to file applications for all necessary federal permits concurrent with the filing of the Section 7(c) certificate application.

- 6. A list and description of the interest of other persons and organizations who have been contacted about the project (including contact names and telephone numbers).**

Constitution has recently begun meeting with various stakeholders to identify and address their concerns. In March 2012, Constitution began contacting state legislative officials. In April 2012, Constitution will begin contacting other interested stakeholders, including landowners; local, state, and federal agencies; and state, county, and municipal government officials. In the coming months, Constitution will contact all U.S. Representatives and Senators whose districts or states will be affected by the project. A preliminary list of stakeholders is attached. Constitution will provide an updated stakeholder list to FERC staff by the end of the month.

- 7. A description of what work has already been done, e.g., contacting stakeholders, agency consultations, project engineering, route planning, environmental and engineering contractor engagement, environmental surveys/studies, and open houses. This description shall also include the identification of the environmental and engineering firms and sub-contractors under contract to develop the project.**

Constitution initiated development of the Project in January 2012. Hydraulic modeling simulations were completed to identify the facilities, and existing mapping resources and aerial photography depicting current land use were used for preliminary pipeline routing. In May 2012, after notifying landowners, Constitution's engineering personnel will begin conducting ground surveys to identify various constraints, including residential neighborhoods, businesses, other pipelines, high tension power lines, and significant environmental features, to further refine the Project route.

Civil surveys, biological surveys, and cultural resource surveys are expected to commence in May 2012. The drawings identifying the route and construction workspace are scheduled for completion prior to filing the Section 7(c) certificate application.

Constitution will select a preferred route for the Project that takes into consideration impacts on the community and the environment. In order to reduce potential impacts, approximately 12 percent of the Project corridor has been co-located within or adjacent to existing utility rights-of-way.

Constitution has already contacted numerous federal and state agencies to initiate consultation regarding potential impacts to resources. As noted on the attached *Initial Regulatory Contacts* table, Constitution is attempting to schedule meetings with all of these federal and state agencies.

Constitution has contracted with various consulting engineering and environmental firms to complete the surveys, studies, and drawings needed to support the filing of the permits and clearances required for the Project. These include:

- Pipeline Engineering – Gulf Interstate Engineering
- Wetland Surveys and Resource Report Preparation – AECOM
- Threatened and Endangered Species Surveys and Assessment – AECOM
- Cultural Resource Surveys – URS Corporation

Constitution is in the process of selecting a contractor for compressor station engineering.

8. **For LNG terminal projects, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document.**

There are no LNG terminal facilities related to or proposed as part of the Project.

9. **For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document, or a proposal for the submission of an applicant-prepared draft Environmental Assessment as determined during the initial consultation described in paragraph (c) of this section.**

Constitution prepared a Request for Proposal (“RFP”) for a third party contractor to prepare environmental documents. The RFP was reviewed by FERC and issued to six prospective contractors on March 21, 2012. Proposals were received from three prospective contractors by the deadline of April 2, 2012. Constitution then analyzed and scored the proposals. Constitution is submitting to Staff under separate cover copies of three proposals and its recommendation for a potential contractor.

**10. Acknowledgement that a complete Environmental Report and complete application are required at the time of filing.**

Constitution acknowledges that a complete Environmental Report and a complete application under Section 7(c) of the NGA will be required at the time of filing. Constitution anticipates submitting the report and application to the Commission in January 2013.

**11. A description of a Public Participation Plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including a project website and a single point of contact. This plan shall also describe how the applicant intends to respond to requests for information from federal and state permitting agencies, including, if applicable, the governor's designated agency for consultation regarding state and local safety considerations with respect to LNG facilities.**

Constitution's commitment to stakeholder communications and effective public outreach on the Project is set forth in the *Constitution Pipeline – External Communications Plan*, a copy of which is attached. Constitution plans to hold five open houses in July and August 2012 at locations near the proposed facilities.

For stakeholder communications, Constitution has established a toll-free information telephone line at (866) 455-9103 as well as an e-mail address at PipelineExpansion@Williams.com. Constitution's land agents will serve as points of contacts with landowners; they will also assist, as necessary, in public outreach efforts with local constituents affected by the Project. Constitution has established a public website for the Project at <http://www.constitutionpipeline.com/>. Items on the website include:

- Project overview
- Project location maps
- Route selection process
- Answers to frequently-asked questions
- Regulatory overview, with links to the Commission website
- Construction procedures
- Pipeline safety
- News
- Contact information

This website will be maintained throughout the Project.

In order to further inform interested parties, Constitution will periodically distribute *Project Update* newsletters to interested stakeholders.

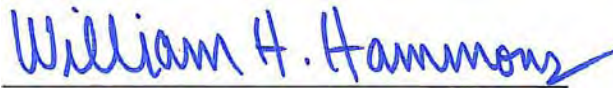
- 12. Certification that a Letter of Intent and a Preliminary WSA have been submitted to the U.S. Coast Guard or, for modifications to an existing or approved LNG terminal, that the U.S. Coast Guard did not require such information.**

There are no LNG terminal facilities related to or proposed as part of the Project.

Accordingly, Constitution hereby requests that the Commission Staff initiate a pre-filing review of the Constitution Pipeline.

Respectfully submitted,

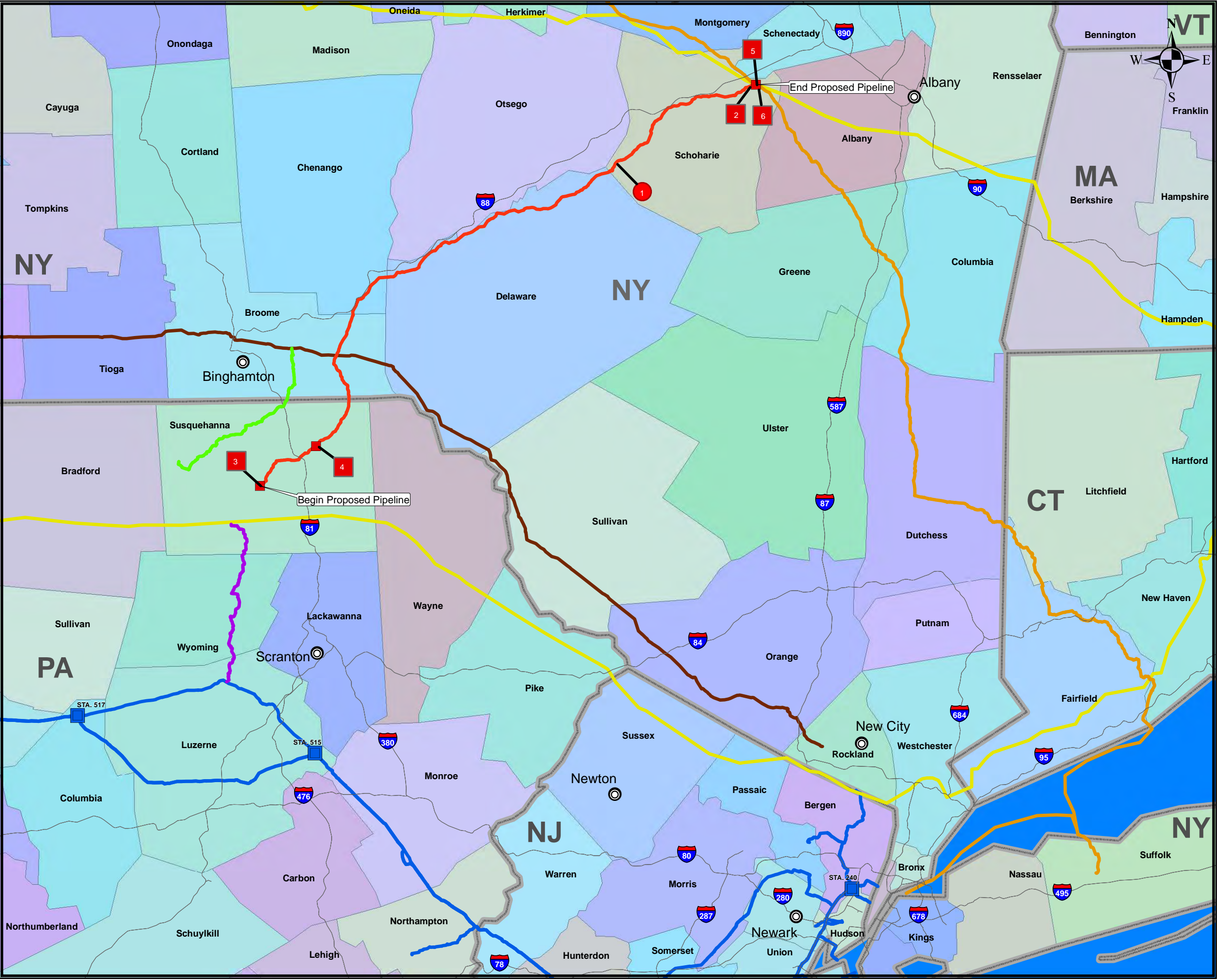
**CONSTITUTION PIPELINE COMPANY, LLC**



William H. Hammons  
Team Leader, Rates and Regulatory  
713-215-2130  
713-215-3483 (fax)

Enclosures

cc: Lauren O'Donnell, Director, Division of Gas – Environment and Engineering  
Charles T. Brown, Environmental Project Manager, Division of Gas – Environment and Engineering



**LIST OF PROPOSED PROJECT SCOPE  
CONSTITUTION PIPELINE PROJECT**

**PIPELINE**

1 PROPOSED PIPELINE (APPROX. 121 Miles)

**COMPRESSOR STATION**

2 PROPOSED COMPRESSOR STATION

**OTHER FACILITIES**

3 PROPOSED METER & REGULATOR STATION

4 PROPOSED METER & REGULATOR STATION

5 PROPOSED METER & REGULATOR STATION

6 PROPOSED METER & REGULATOR STATION

PROPOSED NEW FACILITIES

PROPOSED CONSTITUTION PIPELINE

EXISTING SPRINGVILLE PIPELINE

EXISTING IROQUOIS PIPELINE

EXISTING TENNESSEE PIPELINES

EXISTING MILLENNIUM PIPELINE

EXISTING LASER PIPELINE

EXISTING TRANSCO PIPELINE

EXISTING TRANSCO COMPRESSOR STATIONS

**FOR DISCUSSION PURPOSES  
SUBJECT TO CHANGE  
03/29/2012**

0153045

SCALE IN MILES

**CONSTITUTION PIPELINE  
PROJECT LOCATION MAP**

CONSTITUTION PIPELINE COMPANY, LLC  
MARCH 29, 2012

Rev. A

CONSTITUTION PIPELINE

Constitution Pipeline - Initial Regulatory Contacts

Pre-File Agency Correspondence Tracking Sheet - Federal Agencies												
Agency	Region/ Division	Contact Name	Contact Address	Contact Phone	Contact Email	Initial Contact Date	Date Sent	Response Date/Type	Participating Agency (Y / N)	Responding Contact	Meeting Schedule	Additional Comments
USFWS	Region 5	Mr. David Stilwell	New York Field Office Field Supervisor 3817 Luker Road Cortland, NY 13045	(607) 753-9334	david_stilwell@fws.gov		Letter 4/5/12					
USFWS	Region 5	Mr. Clint Riley	Pennsylvania Office Project Leader 315 South Allen St Suite 322 State College PA 16801	(814) 234-4090 x 233	Clint_Riley@fws.gov	3/28/12 Clint Riley - Voice Mail	Letter 4/5/12					
US EPA	Region 2	Ms. Judith A. Enck	Regional Administrator 290 Broadway New York, NY 10007-1866	(212) 637-5000	enck.judith@epa.gov		Letter 4/5/12					
US EPA	Region 3	Mr. Shawn M. Garvin	Regional Adminstrator 1650 Arch St. Philadelphia, PA 19103	(215) 814-2900	R3_RA@epa.gov		Letter 4/5/12					
US NPS	Northeast Region	Mr. Dennis Reidenbach	Regional Director U.S. Custom House 200 Chestnut St., Fifth Floor Philadelphia, PA 19106	(215) 597-7013	Dennis_Reidenbach@nps. gov		Letter 4/5/12					
US ACE	Baltimore District	Mr. Mike Dombroskie	Pennsylvania Field Office 1631 South Atherton Street Suite 102 State College, PA 16801	(814) 235-0571	mike.dombroski@usace.ar my.mil	3/28/12 Wade Chandler USACE Baltimore – Conversation with followup e-mail containing mapping and requesting meeting (4/3/12), Mike Dombowski - email with site mapping (4/3/12)	Letter 4/5/12					
US ACE	New York District	Ms. Heidi Firstencel	Upstate New York Field Office ATTN: CENAN-OP-RU, Bldg. 10, 3rd Floor North 1 Buffington Street, Watervliet Arsenal Watervliet, NY 12189-4000	(518) 266-6350	cenan.rfo@usace.army.mil	4/3/12 Wade Chander of the Baltimore Disctrict stated that he will speak with the NY and Buffalo District leaders at a Joint Meeting and display project mapping	Letter 4/5/12					
US ACE	Buffalo District	Ms. Diane Kolslowski	Main Office Regulatory Branch Chief 1776 Niagara Street Buffalo, NY 14207	(716) 879-4330		4/3/12 Wade Chander of the Baltimore Disctrict stated that he will speak with the NY and Buffalo District leaders at a Joint Meeting and display project mapping	Letter 4/5/12					
NOAA Fisheries	Northeast Region Office	Ms. Jennifer Anderson	NEPA Coordinator 55 Great Republic Drive Gloucester, MA 01930	(978) 281 9226	jennifer.anderson@noaa.g ov		Letter 4/5/12					

**Constitution Pipeline - Initial Regulatory Contacts**

Pre-File Agency Correspondence Tracking Sheet - PA State Agencies												
Agency	Region/ Division	Contact Name	Contact Address	Contact Phone	Contact Email	Initial Contact Date	Date Sent	Response Date/Type	Participating Agency (Y / N)	Responding Contact	Meeting Schedule	Additional Comments
PA DEP	Northeast Regional Office	Mr. Michael Bedrin	Regional Director 2 Public Square Wilkes Barre, PA 18711	(570) 826-2511	mbedrin@pa.gov	3/28/12 <b>Joseph Buczynski</b> PADEP NE – Conversation with followup e-mail containing mapping and requesting meeting (4/3/12), <b>Collene Stutzman</b> - requested additional information (4/3/12), <b>Jim Garner</b> Susquehanna Soil Conservation District Conversation (3/28/12) with followup e-mail containing mapping and requesting meeting (4/3/12)	Letter 4/5/12					
PA DCNR	Office of the Secretary	Mr. Richard J. Allen	Secretary 7th Floor Rachel Carson State Office Building PO Box 8767 Harrisburg, PA 17105	(717) 787-2869			Letter 4/5/12					
PA FBC	Northeast Region	Mr. John Arway	Executive Director Pennsylvania Fish and Boat Commission 1601 Elmerton Avenue P.O Box 67000 Harrisburg, PA 17106	(717) 705-7801	jarway@pa.gov		Letter 4/5/12					
PGC	Northeast Region	Mr. Stephen Schweitzer	Director PO Box 220 Dallas, PA 18612	(570) 675-1143			Letter 4/5/12					
PA Department of Agriculture	Region 3	Mr. Daniel Naylor	Regional Director Route 92 South PO Box C Tunkhannock, PA 18657	(570) 836-2181			Letter 4/5/12					
PHMC	Bureau for Historic Preservation	Ms. Ann Safley	State and Federal Projects 400 North St Commonwealth Keystone Bldg 2nd Floor Harrisburg, PA 17120-0093	(717) 787-9121	rsafley@pa.gov		Letter 4/5/12					
Susquehanna River Basin Commission	Water Resources Management	Mr. Andrew D. Dehoff	1721 N. Front Street, 2nd Floor Harrisburg, PA 17102	(717) 238-0423 x. 221			Letter 4/5/12					

Constitution Pipeline - Initial Regulatory Contacts

Pre-File Agency Correspondence Tracking Sheet - New York State Agencies												
Agency	Region/ Division	Contact Name	Contact Address	Contact Phone	Contact Email	Initial Contact Date	Date Sent	Response Date/Type	Participating Agency (Y / N)	Responding Contact	Meeting Schedule	Additional Comments
NYA&M		Mr. Matthew Brower	Agricultural Resource Specialist 10B Airline Drive Albany, NY 12235-0001	(518) 457-2713	Matthew.Brower@agm kt.state.ny.us		Letter 4/5/12					
NYSDEC	NYNHP	Mr. D.J. Evans	Program Director 625 Broadway, 5th Floor Albany, NY 12233-4757	(518) 402-8948	dxevalns@gw.dec.stat e.ny.us		Letter 4/5/12					
NYSHPO		Ms. Ruth Pierpont	Deputy Commissioner/Deputy Bureau of Parks, Recreation and Historic Preservation Peebles Island State Park P.O. Box 189 Waterford, NY 12188-0189	(518) 237-8643			Letter 4/5/12					
NYDEC	Central Office	Mr. Joe Martens	Commissioner 625 Broadway Albany, NY 12233-4500	518-402-8545		<b>Jack Nasca</b> - Telephone conversation (3/27, 28, 29/12) <b>Chris Hogan</b> (3/30/12) - Telephone conversation <b>Bill Little</b> (3/30/12 & 4/ 2/12) - Telephone conversation <b>Meeting Date Scheduled 4/26/12</b>	Letter 4/5/12					
NYSDEC	Division of Environmental Permits (Region 4) Schoharie County	Mr. William Clark	Regional Permit Administrator 1130 North Wescott Road Schenectady, NY 12306-2014	(518) 357-2069			Letter 4/5/12					
NYSDEC	Division of Environmental Permits (Region 4-sub office) Delaware County	Ms. Martha Bellinger	Deputy Regional Permit Administrator 65561 State Highway - Route 10 HCR #1, Box 3A Stamford, NY 12167-9503	(607) 652-7741			Letter 4/5/12					
NYSDEC	Division of Environmental Permits (Region 7 sub office) Broome and Chenango Counties	Mr. David Bimber	Regional Permit Administrator 615 Erie Bldv. West Syracuse, NY 13204	(315) 426-7438			Letter 4/5/12					
New York State Public Service Commission (NYSPSC)	Office of Electric, Gas and Water	Mr. Thomas Dvorsky	Director Empire State Plaza Agency Building 3 Albany, NY 12223-1350	(518) 473-6080			Letter 4/5/12					

Constitution Pipeline - Initial Regulatory Contacts

Pre-File Agency Correspondence Tracking Sheet - Tribal Historic Preservation Officers											
Agency	Contact Name	Contact Address	Contact Phone	Contact Email	Initial Contact Date	Date Sent	Response Date/Type	Participating Agency (Y / N)	Responding Contact	Meeting Schedule	Additional Comments
Absentee-Shawnee Tribe of Oklahoma	Ms. Karen Kaniatobe	THPO 2025 S. Gordon Cooper Drive Shawnee, OK 74801				Letter 4/5/12					
Cayuga Nation	Mr. Timothy Two Gun	THPO PO Box 11 Versailles, NY 14168				Letter 4/5/12					
Cayuga Nation of New York	Mr. Clint Halftown	P.O. Box 11 Versailles, NY 14168				Letter 4/5/12					
Delaware Nation	Mr. Darrin Ahshapanek	PO Box 825 Anadarko, OK 73005				Letter 4/5/12					
Delaware Tribe of Indians	Mr. Joe Brooks	Chief 200 N.W. Nirginia Avenue Bartlesville, OK 74003				Letter 4/5/12					
Eastern Shawnee Tribe of Oklahoma	Ms. Roxane Weldon	PO Box 350 Seneca, MO 64865				Letter 4/5/12					
Nanticoke Lenni-Lenape Indians of New Jersey	Mr. Mark Gould	PO Box 544 Bridgeton, NJ 08302				Letter 4/5/12					
New Jersey Commission of American Indian Affairs		Rankokus Indian Reservation PO Box 225 Rancocas, NJ 08073				Letter 4/5/12					
Oneida Indian Nation	Mr. Stephen J. Seldon, Esq.	5218 Patrick Road Verona, NY 13478				Letter 4/5/12					
Oneida Nation of New York	Mr. Ray Halbritter	Nation Representative 5218 Patrick Road Verona, NY 13478				Letter 4/5/12					
Oneida Nation of Wisconsin	Ms. Corina Burke	THPO PO Box 365 Oneida, WI 54155				Letter 4/5/12					
Onondaga Nation	Mr. Tony Gonyea	RD 11a Box 245 Via Nedrow, NY 13120				Letter 4/5/12					
Onandaga Nation of New York	Ms. Jean Shenandoah	RR1 Box 319B Nedrow, NY 13120				Letter 4/5/12					
Sand Hill Indians	Dr. Samuel W. Beeler, Jr.	PO box 955 River Street Station Paterson, NJ 07544				Letter 4/5/12					
Seneca Nation of Indians	Ms. Kathleen Mitchell	THPO 467 Center St. Salamanca, NY 14779				Letter 4/5/12					
Seneca-Cayuga Tribe of Oklahoma	Mr. Paul Barton	PO Box 1283 Miami, OK 74355				Letter 4/5/12					

Constitution Pipeline - Initial Regulatory Contacts

Pre-File Agency Correspondence Tracking Sheet - Tribal Historic Preservation Officers											
Agency	Contact Name	Contact Address	Contact Phone	Contact Email	Initial Contact Date	Date Sent	Response Date/Type	Participating Agency (Y / N)	Responding Contact	Meeting Schedule	Additional Comments
Shawnee Tribe	Ms. Belinda Pryor	THPO 29 South 69A Highway Miami, OK 74354				Letter 4/5/12					
St. Regis Mohawk Tribe	Mr. Ken Jock	RR 1 Box 8A Hogansburg, NY 13655				Letter 4/5/12					
St. Regis Band of Mohawk Indians of New York	Ms. Sheree Bonaparte	THPO 412 State Route 37 Akwesasne, NY 13655				Letter 4/5/12					
Stockbridge - Munsee Band of the Mohican Nation of Wisconsin	Mr. Greg Bunker	Route 1 PO Box 70 Bowler, WI 54416				Letter 4/5/12					
Stockbridge - Munsee Community	Mr. Steve Comer	N 8476 Moh He Con Nuck Road Bowler, WI 54416				Letter 4/5/12					
The Delaware Tribe	Mr. Brice Obermeyer	121 1200 Commercial Box 4022 Emporia, KS 66801				Letter 4/5/12					
Tonawanda Seneca Nation	Mr. Roger Hill	Chief 7027 Meadville Road Basom NY 14013				Letter 4/5/12					
Tuscarora Nation	Mr. Neil Patterson, Jr.	2045 Upper Mountain Road Tuscarora Nation Sanborn, NY 14132				Letter 4/5/12					
Tuscarora Nation of New York	Mr. Leo Henry	Chief 2006 Mt. Hope Road Lewiston, NY 14092				Letter 4/5/12					

# Constitution Pipeline

## Preliminary Stakeholders List

Organization/Agency	Division	Contact Full Name	Title	Address 1	Address 2	City	State	ZipCode	Zip+4	Phone Number	Fax	e-mail
Broome County	County	Gerald F. Mollen	District Attorney	P.O. Box 1766	George Harvey Justice Building, Fourth Floor	Binghamton	NY	13902		(607) 778-2423	(607) 778-8870	gmollen@co.broome.ny.us
Broome County	County	Debra A. Preston	County Executive	P.O. Box 1766	60 Hawley Street, Sixth Floor	Binghamton	NY	13902		(607) 778-2109	(607) 778-2044	dpreston@co.broome.ny.us
Broome County	County Clerk	Richard R. Blythe	County Clerk	P.O. Box 2062	Edwin I. Crawford County Office Building, Third Floor	Binghamton	NY	13902		(607) 778-2256	(607) 778-2243	clerkinfo@co.broome.ny.us
Broome County	Emergency Services	Brett B. Chellis	Director / Fire Coordinator	153 Lt. VanWinkle Drive	N/A	Binghamton	NY	13905		(607) 778-2170	(607) 778-1150	bchellis@co.broome.ny.us
Broome County	Legislature	Wayne L. Howard	Majority Leader	P.O. Box 1766	60 Hawley Street, Sixth Floor	Binghamton	NY	13902		(607) 778-2109	(607) 778-2044	
Broome County	Legislature	Jerry F. Marinich	Chair	P.O. Box 1766	60 Hawley Street, Sixth Floor	Binghamton	NY	13902		(607) 778-2109	(607) 778-2044	
Broome County	Legislature	Mark R. Whalen	Minority Leader	P.O. Box 1766	60 Hawley Street, Sixth Floor	Binghamton	NY	13902		(607) 778-2109	(607) 778-2044	
Broome County	Planning Department	Elaine Miller	Commissioner	P.O. Box 1766	60 Hawley Street, Fifth Floor	Binghamton	NY	13902		(607) 778-2114	(607) 778-2175	emiller@co.broome.ny.us
Broome County	Sheriff's Office	David E. Harder	Sheriff	155 Lt. VanWinkle Drive	N/A	Binghamton	NY	13906		(607) 778-1911	(607) 778-2100	bcsheriff@co.broome.ny.us
Chenango County	Sheriff's Office	Ernest Cutting	Sheriff	279 County Road 46	N/A	Norwich	NY	13815		(607) 334-2000		
Chenango County	Sheriff's Office	James Lloyd	Undersheriff	279 County Road 46	N/A	Norwich	NY	13816		(607) 334-2000		
Chenango County	Agriculture & Farmland Protection Board	Donald Franklin	Chairperson		N/A		NY			(607) 895-6641		
Chenango County	Executive County Officers	Carol A. Franklin	Democratic Commissioner		N/A		NY			(607) 337-1765		
Chenango County	Executive County Officers	Harriet Jenkins	Republican Commissioner		N/A		NY			(607) 337-1764		
Chenango County	Executive County Officers	Lawrence N. Wilcox	Board of Supervisors Chairman	5 Court Street	N/A	Norwich	NY	13815		(607) 337-1700		
Chenango County		Karri Beckwith	Administrator				NY			(607) 337-1870	(607) 337-1489	
Delaware County	County Clerk Staff	Debra Goodrich	Deputy County Clerk	P.O. Box 426	Court House Square	Delhi	NY	13753		(607) 746-2123		
Delaware County	County Clerk Staff	Haley Gransbury	Deputy County Clerk	P.O. Box 426	Court House Square	Delhi	NY	13753		(607) 746-2123		
Delaware County	County Clerk Staff	Sharon O'Dell	County Clerk	P.O. Box 426	Court House Square	Delhi	NY	13753		(607) 746-2123		
Delaware County	County Planning	Nicole Franzese	Planning Director	PO Box 367	N/A	Delhi	NY	13753		(607) 746-2944		
Delaware County	Board of Supervisors	James E. Eisel, Sr.	Chair	22 Wilcox Road	N/A	Harpersfield	NY	13786		(607) 652-4350		
Delaware County	Board of Supervisors	Tina Mole	Vice Chair	P.O. Box 63	N/A	Bovina Center	NY	13740		(607) 832-4312		
Delaware County	Clerk of the Board	Lori Koronowski	Assistant Clerk	112 Main Street	N/A	Delhi	NY	13753		(607) 832-5110	(607) 832-5111	
Delaware County	Clerk of the Board	Christa M. Schafer	Board Clerk	111 Main Street	N/A	Delhi	NY	13753		(607) 832-5110	(607) 832-5111	cob@co.delaware.ny.us
Delaware County	County Sheriff's Office	Craig S. DuMond	Undersheriff	280 Phoebe Lane - Suite One	N/A	Delhi	NY	13753		(607) 746-2336	(607) 746-8151	
Delaware County	County Sheriff's Office	Thomas E. Mills	Sheriff	280 Phoebe Lane - Suite One	N/A	Delhi	NY	13753		(607) 746-2336	(607) 746-8151	shrff@co.delaware.ny.us
Schoharie County	Board of Supervisors	Harold Vroman	Chair	P.O. Box 429	372 Charlotte Valley Road, Charlotteville NY 12036	Schoharie	NY	12157		(518) 287-1430	(518) 295-8482	
Schoharie County	County Sheriff's Office	Anthony F. Desmond	Sheriff	P.O. Box 689	157 Depot Lane	Schoharie	NY	12157		(518) 295-2266	(518) 295-2267	
Schoharie County		Karen Miller	Board Clerk	P.O. Box 429	284 Main Street	Schoharie	NY	12157		(518) 295-8347	(518) 295-8482	millerk@co.schoharie.ny.us
Susquehanna County	Board of Supervisors	Michael Giangrieco	Vice Chair	P.O. Box 218	105 Maple Street	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	
Susquehanna County	Board of Supervisors	Alan Hall	Chair	P.O. Box 218	105 Maple Street	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	
Susquehanna County	Board of Supervisors	MaryAnn Warren	Commissioner	P.O. Box 218	105 Maple Street	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	
Susquehanna County	County	Sylvia Beamer	Chief Clerk	P.O. Box 218	105 Maple Street	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	
Susquehanna County	Office of Emergency Management	Charlene Moser	Coordinator	81 Public Avenue	N/A	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	emadirector@susqco.com
Susquehanna County	Planning Commission	Robert G. Tempelton	Director	81 Public Avenue	N/A	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	susqplan@susqco.com
Susquehanna County	Sheriffs' Office	Lance Benedict	Sheriff	P.O. Box 218	105 Maple Street	Montrose	PA	18801		(570) 278-4600	(570) 278-9268	



CONSTITUTION PIPELINE

## **Constitution Pipeline Company LLC**

### **External Communications Plan**

April 4, 2012

#### **Operating objective**

Our primary objective is to build credibility and trust by positioning Constitution as:

- A developer of critical infrastructure necessary to meet the region's future energy needs.
- A reliable natural gas transporter backed by two companies with a long history of safe operations.
- A communicative company that is responsive to public concerns.

Additionally, Constitution must:

- Effectively articulate the importance of the project to the region, as well as measurable local benefits.
- Work with communities and stakeholders to educate them about our company, the proposed project and the regulatory process.
- Attempt to achieve win-win solutions to issues and concerns.
- Communicate the vital role the new pipeline system will play by transporting much needed natural gas supply to the northeast region.

#### **Target audiences**

*A complete listing of impacted communities and key stakeholders is available on the Constitution Pipeline Project Stakeholder List.*

**Local Public Officials, Town/Township Administrators, Emergency Responders, Law Enforcement, Planning Commissions, etc.**

##### **Susquehanna County, PA**

Bridgewater Township  
New Milford Township  
Oakland Township  
Jackson Township  
Harmony Township

##### **Broome County NY**

Sanford  
Windsor  
Colesville

### **Chenango County, NY**

Afton  
Bainbridge

### **Delaware County, NY**

Masonville  
Sidney  
Franklin  
Davenport  
Harpersfield  
Meredith  
Kortright

### **Schoharie County, NY**

Summit  
Richmondville  
Cobleskill  
Schoharie  
Wright  
Jefferson  
Middleburgh

## **State & Federal Officials**

### **Pennsylvania**

U.S. Senators  
Governor  
U.S. Representatives  
State Senators  
Commissioner, PA PUC  
State Representatives

### **New York**

U.S. Senators  
Governor  
U.S. Representatives  
State Senators  
Commissioner, NYS Public Service Commission  
State Representatives

## **Media**

### **Susquehanna County, PA**

#### **Weekly Newspapers**

Susquehanna County Independent  
Montrose, PA  
[www.independentweekender.com](http://www.independentweekender.com)  
(570) 278-NEWS

Susquehanna County Transcript  
Susquehanna, PA  
[www.susquehannatranscript.com](http://www.susquehannatranscript.com)  
(570) 853-3134

**Daily Newspapers**

Scranton (PA) Times  
[www.scrantontimes.com](http://www.scrantontimes.com)  
(570) 348-9135

**Broome County, NY**

**Daily Newspapers**

Binghamton Press & Sun  
[www.pressconnects.com](http://www.pressconnects.com)  
(607) 798-1113

**Chenango County, NY**

**Daily Newspapers**

The Evening Sun  
[www.evesun.com](http://www.evesun.com)  
(607) 334-3276

**Delaware County, NY**

**Daily Newspapers**

The Daily Star  
Oneonta, NY  
<http://thedailystar.com>  
607-432-1000

**Schoharie County, NY**

**Daily Newspapers**

Times-Journal News  
Cobleskill, NY  
[www.timesjournalonline.com](http://www.timesjournalonline.com)  
518-234-2515

**Key messages**

Audience	Message
Federal / State Officials	<ul style="list-style-type: none"><li>• Purpose and need for the project -- Williams and Cabot are partnering to develop a new interstate natural gas pipeline to connect production in northeastern Pennsylvania with northeastern markets, including New England and New York City.</li><li>• Increased demand for natural gas.</li><li>• Seek early input from citizens and local governmental entities to identify and address local issues.</li><li>• Educate elected officials about the FERC process and public input opportunities.</li></ul>

Public Officials & Community Stakeholders	<ul style="list-style-type: none"> <li>• Purpose and need for the project-- Williams and Cabot are partnering to develop a new interstate natural gas pipeline to connect production in northeastern Pennsylvania with northeastern markets, including New England and New York City.</li> <li>• Increased demand for natural gas.</li> <li>• Seek early input from citizens, governmental entities and other interested parties to identify and address potential issues.</li> <li>• Educate communities about the FERC process and public input opportunities.</li> </ul>
Landowners	<ul style="list-style-type: none"> <li>• Request early input from landowners to identify and address potential issues.</li> <li>• Invitations to attend open houses.</li> <li>• Upfront information about field activities and FERC process.</li> <li>• Fair compensation to landowners.</li> <li>• Prompt payment to landowners.</li> <li>• Advance notice of construction activities.</li> <li>• Landowner still retains ownership of land.</li> </ul>

### Communications Timeline

Date	Task
March 2012	Begin to identify stakeholders
	Develop stakeholder list
March 2012	Notify NY & PA state officials
April 2012	Begin notifying local stakeholders about project and upcoming field activities ✓ Township administrators, county commissioners, emergency responders, etc.
	Request FERC pre-filing
	Begin requesting survey permission from landowners
	Website available
May 2012	Notifications to stakeholders and landowners of FERC pre-filing process
	Landowner newsletter
July 2012	Newspaper ads and invitations to open houses
	Open houses (5)
January 2013	FERC filing
	Notification of 7(c) filing to stakeholders and landowners
	Landowner newsletter
April 2014	Proposed start of construction
March 2015	Proposed in-service

## Tactics & Approach

**Personalize the company.** In order to carry out community outreach activities in the pre-siting stage, Constitution needs to work with potentially impacted communities and local officials to communicate with them on a personal level.

**Build relationships.** Develop a list of key stakeholder contacts. An essential key to managing the flow of information to relevant parties is to first define which individuals, groups or opinion leaders are important in the siting process. Conduct early meetings with key stakeholders so that they are not confronted with “surprises.” Listen to the stakeholders’ thoughts, questions or concerns and proactively work with them to reach win-win solutions.

**Educate stakeholders.** Educate stakeholders about the “big picture.” It’s critical that stakeholders understand (1) the FERC process and (2) how our expansion can help them maintain – or enhance – their quality of life. Also, identify direct economic benefits that will accrue to the local community as a result of the project.

**Maintain openness.** Constitution should go out of its way to demonstrate it has nothing to hide. By making stakeholders aware of new developments and providing them with timely information, they will begin to perceive Constitution as an important information source. The absence of information from the company opens the door to speculation and misinformation.

**Build third-party endorsement.** Third-party support is vital to building credibility. Earning endorsements from third parties lends credibility to the pipeline company and its key messages. In addition, the effectiveness of project key messages is greatly increased when delivered by a third-party. This support gives a pipeline project the support it needs to survive the battle of public opinion.

## Risk evaluation

- If stakeholder concerns are not identified and addressed early in the project, then those concerns will likely lead to public and political opposition.
- Expectations must be managed properly. Early communication will frustrate stakeholders who expect more solidified answers to siting questions.
- Credibility will be permanently damaged if commitments are made, but not followed through.

## Communication vehicles

The most effective way to communicate and build relationships is face-to-face meetings. Additionally, we should rely on other proven communication vehicles including:

- Website [www.constitutionpipeline.com](http://www.constitutionpipeline.com)
- Toll-free hotline (866-455-9103)
- E-mail address: [pipelineexpansion@williams.com](mailto:pipelineexpansion@williams.com)
  - Newsletter
  - Landowner Information brochure
  - E-mail updates
  - Letters/Correspondence
  - Table top presentations
  - Open Houses

- Informational briefing handouts for local officials and stakeholders
- Fact Sheets
  - Project overview
  - Safety
  - FERC process
- Maps
  - High-level county maps for general distribution
  - More detailed maps for public officials / open houses

# # #