IROQUOIS GAS TRANSMISSION SYSTEM, L.P.

08/09 EXPANSION PROJECT

DRAFT
RESOURCE REPORT 1

GENERAL PROJECT DESCRIPTION

PUBLIC

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RESOURCE REPORT 1 – GENERAL PROJECT DESCRIPTION

FERC ENVIRONMENTAL CHECKLIST

Part 380 – Minimum Filing Requirements for Environmental Reports	**Company Compliance or Inapplicability of Requirement**
Provide a detailed description and location map of the Project facilities (§ 380.12 (c) (1)).	Section 1.1 Volume III – Appendix J
Describe any non-jurisdictional facilities that would be built in association with the Project (§ 380.12 (c) (2)).	Section 1.8
Provide current original U.S. Geological Survey (USGS) 7.5-minute series topographic maps with mileposts showing the Project facilities (§ 380.12 (c) (3)).	Volume III – Appendix K
Provide aerial images or photographs or alignment sheets based on these sources with mileposts showing the Project facilities (§ 380.12 (c) (3)).	Volume III – Appendix M
Provide plot / site plans of compressor stations showing the location of the nearest noise-sensitive areas (NSA) within 1 mile (§ 380.12 (c) (3, 4)).	Volume IV – Appendix U
Describe construction and restoration methods (§ 380.12 (c) (6)).	Section 1.3
Identify the permits required for construction across surface waters (§ 380.12 (c) (9)).	Table 1.6-1
Provide the names and addresses of all affected landowners and certify that all affected landowners will be notified as required in §157.6(d) (§ 380.12 (a) (4) and (c) (10)).	Section 1.7 Volume V – Appendix P

RESOURCE REPORT 1: GENERAL PROJECT DESCRIPTION

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Non Internet Public Information – Please Refer to Volume III – Appendix J

1.0 GENERAL PROJECT DESCRIPTION

Iroquois Gas Transmission System L.P, ("Iroquois") is proposing to construct the 08/09 Expansion Project ("Project"), in Oneida and Schoharie Counties, New York and Fairfield and New Haven Counties, Connecticut to deliver up to 200,000 dekatherms per day of firm natural gas transportation service to KeySpan Gas East Corporation d/b/a KeySpan Energy Delivery Long Island ("KeySpan"). Iroquois' proposed 08/09 Expansion Project involves the construction of three sections of new, 36-inch outside diameter ("OD") pipeline looping and associated aboveground facilities along Iroquois' existing main line in New York and Connecticut, a new compressor station in Milford, CT and additional compression and gas cooling at the previously FERC certificated compressor station (CP02-31-002) to be constructed in Brookfield, CT. The Project has been divided into three phases to accommodate facility in-service dates as requested by the customer. The phase breakdown is as follows:

Phase I – In-Service Date of November 1, 2008
- 5.8 miles of 36-inch OD pipeline looping in Boonville, NY
- 1.0 mile of 36-inch OD pipeline looping in Wright, NY
- 1.6 miles of 36-inch OD pipeline looping in Newtown, CT

Phase II – In-Service Date of January 1, 2009
- New Compressor Station in Milford, CT

Phase II – In-Service Date of November 1, 2009
- Additional compression and gas cooling at Brookfield Compressor Station in Brookfield, CT

Resource Report 1 is one of several resource reports that collectively constitute the 08/09 Expansion Project's overall Environmental Report ("ER"). This ER has been prepared in accordance with the Federal Energy Regulatory Commission ("FERC" or "Commission") Order No. 603, which governs the filing of applications for Certificates of Public Convenience and Necessity Authorizing the Construction and Operation of Facilities to Provide Service under Section 7 of the Natural Gas Act; the FERC *Guidance Manual for Environmental Report Preparation* ("FERC Guidance Manual") (March 2005); and reporting requirements of the New York State Environmental Quality Review Act [6 NYCRR Part 617]. Please note that Resource Report 12 (PCB Contamination) and Resource Report 13 (Engineering and Design Material) are not applicable to this Project based on the FERC requirements.

Iroquois' application and the accompanying ER ("Iroquois' filing") has been divided into five volumes to comply with FERC's document control requirements for Public, Non-internet Public ("NIP"), Privileged - Not for Release, and Critical Energy Infrastructure Information ("CEII") - Not for Release classes of information. The contents of each volume are as follows:

- **Volume I:** Iroquois' Section 7 Application;

- **Volume II: Public -** ER for the 08/09 Expansion Project, which is for public release. NIP figures have been removed from this volume and placed into Volume III; Appendices to the ER available to the public. This volume includes information such as agency correspondence and contingency plans;

- **Volume III: Non-Internet Public** - Appendices to the ER that are NIP including Resource Report Figures, a general project map, full-size USGS Quadrangle Maps, National Wetland Inventory Maps, and aerial alignment sheets;

- **Volume IV: Critical Energy Infrastructure Information** - Appendices to the ER that are CEII including mainline valve details and plot plans of the facility work at the existing South Commack meter station ("MS") and proposed interconnect. Volume IV has a limited distribution due to national security concerns.

- **Volume V: Privileged and Confidential** - Appendices containing information deemed to be Privileged and/or confidential. This volume contains a Rare Species Survey Report, Phase I Cultural Resource Report and affected landowner information. Volume V has a limited distribution due to natural and cultural resource protection. It also includes a copy of the Precedent Agreement between Iroquois and KeySpan.

On March 23, 2007, the Commission approved a request by Iroquois to submit the ER for the Project under the National Environmental Policy Act ("NEPA") Pre-filing Process. The NEPA Pre-Filing Process involves the review of the ER in draft form by the Commission and solicitation of comments and identification of concerns regarding the Project by federal, state and local agencies, land owners, environmental groups, and other stakeholders. The end result of this process will be that the final ER has undergone extensive Commission review for completeness and incorporates measures to address agency and stakeholder concerns to the extent possible. Section 1.6 of Resource Report 1 describes agency and public consultations conducted by Iroquois during the development of the ER and through the Pre-filing Process.

Resource Report 1 identifies the proposed facilities, the purpose and need for the proposed facilities and the land requirements associated with construction and operation of the proposed Project. The proposed pipeline loop facilities are described geographically in a north-to-south direction as well as by the facility categories of pipeline facilities and compressor stations. The nomenclature used to identify resources and facilities along the proposed pipeline loop routes throughout this ER and on the associated mapping utilizes Mileposts ("MPs") commencing at the starting point of the loop along Iroquois' existing Mainline (MP 0.00) and extending to the terminus of each loop section. The U.S. Geological Service ("USGS") topographic quadrangle maps and the National Wetland Inventory ("NWI") maps provided in Volume III – Appendices K and L also identify major mileposts along the proposed alignment.

In addition, Resource Report 1 discusses the proposed construction, operation and maintenance procedures for the Project facilities, identifies regulatory permits and approvals required to construct and operate the proposed Project and documents the need for foreseeable future expansion or abandonment of the proposed facilities. The landowners whose properties will be crossed or affected by the proposed Project are identified in Volume V – Appendix P.

1.1 PROPOSED FACILITIES

1.1.1 Purpose and Need

The purpose of the Project is to provide firm natural gas transportation services to KeySpan. Algonquin Gas Transmission, LLC ("Algonquin") has previously entered into a precedent agreement with KeySpan for delivery of a maximum daily volume of 175,000 dekatherms per day ("Dth/d") of firm natural gas service effective November 1, 2008 and an additional 25,000 dekatherms per day commencing November 1, 2009. KeySpan seeks the 08/09 Expansion Project to deliver the aforementioned volumes to the New York City and Long Island markets. Accordingly, KeySpan has entered into a binding precedent agreement with Iroquois for transport of the volumes via the 08/09 Expansion Project. The Purpose and Need for this Project will be more fully described in Volume I (Iroquois' Section 7 Application).

The natural gas volume will be delivered by Algonquin to Iroquois at Brookfield, Connecticut for KeySpan's account. The volumes will subsequently be transported by Iroquois and delivered to KeySpan at its existing South Commack, New York meter station. To facilitate these delivery volumes, Iroquois will need to construct facilities as outlined in Section 1.0. However, due to construction constraints, Iroquois will commit to delivering the volumes as described below:

- Phase I - 95,000 Dth/d commencing November 1, 2008 and coinciding with the completion of all of the 36-inch OD pipeline looping construction in New York and Connecticut.

- Phase II - 80,000 Dth/d additional capacity commencing January 1, 2009 and coinciding with the completion of the 20,620 HP Compressor Station in Milford, Connecticut.

- Phase III - 25,000 Dth/d additional capacity commencing November 1, 2009 and coinciding with the completion of an additional 10,310 HP of compression and gas cooling facilities at Brookfield, Connecticut.

1.1.2 Location and Description of Facilities

The proposed pipeline and aboveground facilities associated with the 08/09 Expansion Project are listed in Table 1.1-1. These facilities are conceptual in nature and are subject to final design and FERC approval.

TABLE 1.1-1
PROPOSED PIPELINE AND ABOVEGROUND FACILITIES OF THE 08/09 EXPANSION PROJECT

Proposed Facility	New/Modified	MP(s)a	Town	County, State	Project Phase
Pipeline Facilities					
36-inch Diameter Loop	New	105.3 – 111.1	Boonville	Oneida, New York	I
	New	190.9 – 191.9	Wright	Schoharie, New York	I
	New	318.3 – 319.9	Newtown	Fairfield, Connecticut	I
Aboveground Facilities					
Compressor Station	New	336.0	Milford	New Haven, Connecticut	II
Compressor Station	Modified	308.8	Brookfield	Fairfield, Connecticut	III

[a] Milepost location is based upon the existing Iroquois Mainline

1.1.2.1 Pipeline Facilities

The pipeline loop segments will be located within or directly adjacent to Iroquois' existing Mainline permanent ROW. Additional permanent ROW will be required along with temporary workspace ("TWS") and additional temporary workspace ("ATWS") to facilitate construction of the pipeline. The routing for the pipeline loop was conducted in a manner to avoid significant areas of residential development, minimize the number of affected landowners, and effectively manage environmental impacts. The preferred route and workspace configurations are discussed below, detailed on figures in Volume III of this report and depicted on aerial alignment sheets provided in Volume III – Appendix M.

1.1.2.1.1 Boonville Loop Segment – Boonville, NY

The pipeline loop in Boonville, New York consists of approximately 5.8 miles of new 36-inch OD pipeline co-located within Iroquois' existing Mainline right-of-way "ROW" (see Figure 1.1-3a in Volume III). The loop segment commences near Iroquois' existing main line valve ("MLV") 8 at approximate MP 105.3 and extends southward to approximate MP 111.1. The proposed pipeline is designed for a maximum allowable operating pressure of 1,480 pounds per square inch gauge ("psig") and will be constructed of carbon steel.

1.1.2.1.1 Wright Loop Segment – Wright, NY

The pipeline loop in Wright, New York consists of approximately 1.0 mile of new 36-inch OD pipeline co-located within Iroquois' existing Mainline right-of-way "ROW" (see Figures 1.1-3a in Volume III). The loop segment commences near Iroquois' existing MLV 14 at approximate MP 190.9 and extends southward to approximate MP 191.9. The proposed pipeline is designed for a maximum allowable operating pressure of 1,480 pounds per square inch gauge ("psig") and will be constructed of carbon steel.

1.1.2.1.3 Newtown Loop Segment – Newtown, CT

The pipeline loop in Newtown, Connecticut consists of approximately 1.6 miles of new 36-inch OD pipeline co-located within Iroquois' existing Mainline right-of-way ("ROW") (see Figures 1.1-3c in Volume III). The loop segment commences at approximate MP 318.3 and extends southward to approximate MP 319.9. The proposed pipeline is designed for a maximum allowable operating pressure of 1,440 pounds per square inch gauge ("psig") and will be constructed of carbon steel.

1.1.2.1.4 Internal Inspection Facilities

The pipeline loop segments will be constructed to allow for internal inspection. While no permanent launcher and receiver facilities are proposed, the pipeline facilities will be designed to allow for future connection of launching and receiving facilities to accommodate the passage of internal inspection tools.

1.1.2.1.5 Valve Assemblies

Iroquois will install tie-in valve assemblies at each end of the pipeline loop segments. There are no new meter stations associated with this project. The looping pipeline will have crossover valves at the beginning and ending sections of the pipeline that will be operated manually for isolation purposes. Emergency isolation of the looping sections will be accomplished via isolation and/or evacuation of the loop segments without affecting the existing mainline valves immediately upstream and downstream of the looping facilities. During operation, the loop segment will only be isolated from the existing mainline for inspection or maintenance purposes.

1.1.2.1.6 Temporary Facilities

Pipe/Equipment Storage Yards and Contractor Yards

Pipe yard / contractor yard locations are traditionally finalized later in the workspace identification process due to the changing availability of open land and the cost associated with the lease/rental of such properties and contractor needs. Iroquois has investigated several preliminary pipe / equipment storage areas / contractor yards for the various loop sections. Please refer to Resource Report 8 for additional information on pipe storage / contractor yards proposed for the loop segments.

Access Roads

Access roads are required for construction so the contractor may move personnel, equipment and material to the pipeline ROW. Iroquois anticipates accessing the majority of the construction ROW via existing public roadways and private access roads. New access roads proposed for the Project are identified in Resource Report 8 as well as on the Project alignment sheets. Iroquois will install access driveways for the new valve locations where existing access driveways do not exist. Iroquois anticipates that permanent access roads currently in use for operational access to the existing Mainline will also be used to provide access to the loop segments upon completion of construction. Please refer to Resource Report 8 for additional information on access roads proposed for the loop segments.

1.1.2.2 Aboveground Facilities

Iroquois proposes to design and operate the proposed compressor units using the same or similar techniques that have been applied to successfully design, construct, and operate its existing compressor stations in the towns of Boonville, Dover, Wright, Croghan and Athens, New York. Key elements of the Milford and

Brookfield station designs would be the installation of gas turbines incorporating Best Available Control Technology ("BACT") and the construction of stations that will be aesthetically compatible with the existing surroundings.

1.1.2.2.1 Milford Compressor Station – Milford, CT

The Milford Compressor Station will be installed to increase the natural gas throughput of the existing downstream pipeline by boosting the pressure of the natural gas up to the current MAOP of 1,440 psig (see Figures 1.1-3e in Volume III). The increase of pipeline gas pressure will be accomplished through the installation of two, 10,310 [nominal] horsepower ("hp") turbine driven centrifugal compressors. The turbo-compressors will be fueled by natural gas and equipped with a "lean pre-mix" dry low nitrogen oxide ("NOx") combustors to limit NOx, carbon monoxide ("CO") and particulate matter ("PM") emissions to less than BACT levels. The associated facilities include two unit control buildings, station maintenance / control building, emergency electrical power generator, a domestic gas building plus parking and access areas.

1.1.2.2.2 Brookfield Compressor Station Modifications – Brookfield, CT

The Brookfield Compressor Station Modifications will be installed to transfer incremental gas volumes from the existing Algonquin Gas Transmission, LLC ("Algonquin") pipeline transmission system to Iroquois (see Figures 1.1-3d in Volume III). The increase of throughput will be accomplished by the addition of a 10,310 [nominal] horsepower ("hp") turbine driven centrifugal compressor. The turbo-compressors will be fueled by natural gas and equipped with a "lean pre-mix" dry low nitrogen oxide ("NOx") combustors to limit NOx, carbon monoxide ("CO") and particulate matter ("PM") emissions to less than BACT levels. The associated facilities include a unit control building, aerial natural gas coolers, and gas filtration equipment.

1.1.2.2.3 Temporary Facilities

Equipment Storage Yards and Contractor Yards

During construction of the proposed Milford Compressor Station, Iroquois anticipates the use of the site property for both the contractor yard and storage of materials. For the proposed Brookfield Compressor Station Modifications, Iroquois anticipates using the existing Brookfield Compressor Station property for equipment storage and for the contractor yard.

Access Roads

Access roads are required for construction so the contractor may move personnel, equipment and material to the compressor station site. Iroquois anticipates accessing the Milford Compressor Station site via Oronoque Road. Iroquois anticipates accessing the Brookfield Compressor Station site via High Meadow Road and does not foresee the need for any new access roads to facilitate the construction and operation of the proposed compressor station modifications. Please refer to Resource Report 8 for additional information on access roads proposed for the Milford Compressor Station and Brookfield Compressor Station.

1.1.3 Location Maps, Detailed Route Maps, Plot/Site Plans

Accompanying the proposed pipeline and ancillary facility descriptions are the following figures and alignment drawings located in Volume III:

- Figure 1.1-1 (Iroquois System Map) depicts the 08/09 Expansion Project facilities with respect to Iroquois' mainline transmission system;

- Figures 1.1-2a and 1.1-2b (Project Overview Map) depict the 08/09 Expansion Project facilities and associated mileposts in Oneida and Schoharie Counties, New York and Fairfield and New Haven Counties, Connecticut;

- Figures 1.1-3a to 1.1-3e (Site Location Maps) show the pipeline alignment, aboveground facilities and other ancillary facility locations (i.e. pipe yards/equipment storage areas) on United States Geological Survey ("USGS") 7.5-minute series topographic maps at 1:24,000-scale.

- Aerial Alignment Sheets are provided in Volume III - Appendix M. These sheets show the locations of pipeline loop segments and aboveground facilities with corresponding mileposts, construction workspace layout, property owner information, proposed access roads and wetland features. The sheets are based on aerial photography taken in December 2006 and are depicted at 1:2400-scale (1-inch is equivalent to 200 feet).

- Full-size USGS Topographic Quadrangles and National Wetland Inventory ("NWI") maps are provided separately with this filing and depict the same facility information as the USGS quadrangle excerpts in Volume IV.

- A site-specific plot plan of the Milford Compressor Station is provided in Volume IV - Appendix N. This plan shows the locations of the proposed facilities, construction workspace layout, and adjacent property owner information. The plot plan is based on aerial photography taken in winter 2007 and is depicted at 1:40-scale (1-inch is equivalent to 40 feet).

- A site-specific plot plan of the Brookfield Compressor Station is provided in Volume IV - Appendix N. This plan shows the locations of the existing and proposed facilities, construction workspace layout, property owner information and wetland features. The plot plan is based on aerial photography taken in winter 2007 and is depicted at a scale of 1-inch is equivalent to 50 feet.

1.2 LAND REQUIREMENTS

Iroquois is proposing the typical construction right-of-way configurations listed in the table below. The construction workspace consists of the combinations of existing permanent ROW, proposed permanent ROW and proposed temporary workspace shown in the table (please also refer to typical ROW configuration drawing).

Segment Number	Segment Name	Typical Construction Right-of-Way			
		Typical Construction ROW Width (ft)	Existing Permanent ROW Width Used (ft)	Proposed Permanent ROW Width (ft)	Proposed Temporary Workspace Width (ft)
1	Boonville, NY	120	60	10	50
2	Wright, NY	120	40	30	50
3	Newtown, CT	115	35	30	50

As listed, Iroquois will use the existing permanent ROW to a significant extent. This will greatly reduce the proposed new permanent ROW and temporary workspace requirements. Accordingly, impacts to forested and wetland areas will be greatly reduced. All temporary construction workspace areas will be allowed to revert to their former use following construction.

Justification for the total proposed construction ROW widths is as follows:

- Due to the extensive excavation, trench width and spoil storage required for the large diameter 36-inch pipeline being installed, a 40 to 45-foot width is required on the spoil side of the construction ROW. A large majority of this workspace is within existing Iroquois cleared permanent ROW.
- An approximate 75-foot width is required on the working side of the construction ROW. This is due to the large pipeline diameter, trench width and construction equipment size.

1.2.1 Pipeline Facilities

Based on preliminary design, Iroquois estimates that the Phase I pipeline loop segments will require approximately 170.6 acres of total construction workspace (See Table 1.2-1). Of this total, approximately 77.1 acres will be maintained for ongoing pipeline operation (this includes 63.0 acres of existing Iroquois permanent easement / fee property and 14.1 acres of new permanent easement). The balance (93.5 acres) will be used for temporary workspace during construction. Locations of any additional proposed permanent easements, temporary workspaces, additional temporary workspaces or access roads will be filed with the Secretary of the Commission prior to construction for review and approval prior to use. Iroquois will restore the project area following the completion of construction in accordance with the FERC Plan and Procedures (See Volume II – Appendix C). Resource Report 8 (Land Use and Aesthetics) characterizes land requirements per facility by land use category. This section provides a summary of land requirements for construction and operation of the pipeline loop segments associated with Phase I of the proposed 08/09 Expansion Project.

1.2.1.1 Boonville Loop Segment

1.2.1.1.1 Operation / Permanent Easement

Approximately 45.3 acres of the project area will be maintained by Iroquois after construction for the operation of the Boonville Loop segment (this includes 38.5 acres of existing permanent easement / fee property and 6.8 acres of new permanent easement). In general, Iroquois is seeking to co-locate the new loop segment within the existing permanent ROW established for the Iroquois Mainline. Along the proposed loop segment, Iroquois proposes to acquire additional new permanent ROW due to insufficient space within the existing ROW to co-locate the two pipelines.

1.2.1.1.2 Aboveground Facilities

There are no new meter stations associated with the Boonville Loop project. Iroquois will install tie-in valve assemblies at the beginning and ending points of the pipeline loop that will be operated manually for isolation purposes.

1.2.1.1.3 Temporary Workspace / Additional Temporary Workspace

Iroquois is proposing temporary workspace ("TWS") and additional temporary workspace ("ATWS") areas totaling approximately 37.2 acres along the Boonville Loop segment. These areas will not be permanently maintained after construction, but will be returned to landowners for their use or allowed to revegetate

naturally after construction and restoration is complete. Temporary workspace for the segment will account for 35.6 acres of this total and additional temporary workspace will account for the remaining 1.6 acres (see Table 1.2-2). Additional temporary workspace areas are proposed at locations where additional construction work areas are required outside of the typical workspace configuration.

1.2.1.1.4 Pipe / Equipment Storage Yards and Contractor Yards

The proposed pipe yard(s) and storage/staging yard(s) will total approximately 28.1 acres of temporary land use (this includes 10.1 acres of existing Iroquois fee property at the Boonville Compressor Station that will revert to its current use after construction).

1.2.1.1.5 Access Roads

Please refer to Resource Report 8 for additional information regarding proposed access roads associated with the Project.

1.2.1.2 Wright Loop Segment

1.2.1.2.1 Operation / Permanent Easement

Approximately 13.2 acres of the project area will be maintained by Iroquois after construction for the operation of the Wright Loop segment (this includes 10.0 acres of existing permanent easement / fee property and 3.2 acres of new permanent easement). In general, Iroquois is seeking to install the new loop segment immediately adjacent to the existing permanent ROW established for the Iroquois Mainline. Along the proposed loop segment, Iroquois proposes to acquire additional new permanent ROW due to insufficient space within the existing ROW to co-locate the two pipelines.

1.2.1.2.2 Aboveground Facilities

There are no new meter stations associated with the Wright Loop project. Iroquois will install tie-in valve assemblies at the beginning and ending points of the pipeline loop that will be operated manually for isolation purposes.

1.2.1.2.3 Temporary Workspace / Additional Temporary Workspace

Iroquois is proposing TWS and ATWS totaling approximately 10.7 acres along the Wright Loop segment. These areas will not be permanently maintained after construction, but will be returned to landowners for their use or allowed to revegetate naturally after construction and restoration is complete. Temporary workspace for the segment will account for 5.5 acres of this total and additional temporary workspace will account for the remaining 5.2 acres (see Table 1.2-2).

1.2.1.2.4 Pipe / Equipment Storage Yards and Contractor Yards

The proposed pipe yards and storage/staging yard(s) will total approximately 5.1 acres (this is existing fee property that will revert to its current land use following construction).

1.2.1.2.5 Access Roads

Please refer to Resource Report 8 for additional information regarding proposed access roads associated with the Project.

1.2.1.3 Newtown Loop Segment

1.2.1.3.1 Operation / Permanent Easement

Approximately 18.6 acres of the project area will be maintained by Iroquois after construction for the operation of the Newtown Loop segment (this includes 15.1 acres of existing permanent easement / fee property and 3.5 acres of new permanent easement). In general, Iroquois is seeking to co-locate the new loop segment within the existing permanent ROW established for the Iroquois Mainline. Along portions of the proposed loop segment, Iroquois proposes to acquire additional new permanent ROW due to insufficient space within the existing ROW to co-locate the two pipelines. Additionally, Iroquois currently owns two parcels of land in the area (28.33 acres and 41.42 acres in area respectively) that are adjacent to the proposed looping facilities in Newtown. Of the approximate 1.6 linear miles of looping, Iroquois-owned land extends parallel to approximately one mile of the proposed loop and will be utilized to the fullest extent practicable for temporary workspace and permanent easement, if necessary.

1.2.1.3.2 Aboveground Facilities

There are no new meter stations or other aboveground facilities associated with the Newtown Loop project. Iroquois will install tie-in valve assemblies at the beginning and ending points of the pipeline loop that will be operated manually for isolation purposes.

1.2.1.3.3 Temporary Workspace / Additional Temporary Workspace

Iroquois is proposing TWS and ATWS areas totaling approximately 3.5 acres along the Newtown Loop segment. These areas will not be permanently maintained after construction, but will be returned to landowners for their use or allowed to revegetate naturally after construction and restoration is complete. Temporary workspace for the segment will account for the entirety (see Table 1.2-2).

1.2.1.3.4 Pipe / Equipment Storage Yards and Contractor Yards

The proposed pipe yards and storage/staging yard(s) will total approximately 7.0 acres of temporary land use.

1.2.1.3.5 Access Roads

Please refer to Resource Report 8 for additional information regarding proposed access roads associated with the Project.

1.2.2 Aboveground Facilities

1.2.2.1 Milford Compressor Station

1.2.2.1.1 Operation / Permanent Easement

Iroquois proposes to construct the Milford Compressor Station on the site of its existing Milford Sales Meter Station in the City of Milford, New Haven County, Connecticut. The proposed facility will include the construction of two compressor buildings, each housing a 10,310 HP (Nominal) compressor package, a station control/utility building; a single emergency electrical power generator, two unit control buildings and a domestic gas building. The construction of this station will require the use of approximately 4.8 acres located on two parcels: a 4.6 acre parcel that Iroquois owns and contains the meter station, and a 0.9 acre parcel that

Iroquois is planning to lease during construction only. A proposed site plan is included in Volume IV – Appendix N.

The permanent fencing for the compressor station and existing sales meter station is estimated to occupy approximately 3.86 acres of the total 4.8 acres that would be affected by construction. Areas that are expected to be affected by construction include the station yard and temporary work and staging areas. The security fenced yard area will incorporate a relocated sales meter station and the six new buildings as well as a parking area.

1.2.2.1.2 Temporary Workspace / Staging Areas

In addition to the areas encompassed by the existing and the new station facilities, Iroquois anticipates utilizing adjacent areas comprising a total of approximately 1.65 additional acres that will be required to provide temporary work space during the construction of the compressor station. This work space may be used for company and contractor office trailers, parking, material stock piling, pipe fabrication, temporary fuel storage tanks (with secondary containment), storage of supplies, and other temporary construction activity. Following construction, Iroquois proposes to re-grade and landscape these temporary work areas in accordance with the final landscaping plan proposed for development of the compressor station and the FERC Plan and Procedures (see Volume II – Appendix C).

1.2.2.1.3 Access Roads

Iroquois anticipates accessing the Milford Compressor Station site via Oronoque Road. Please refer to Resource Report 8 for additional information regarding proposed access roads associated with the Project.

1.2.2.2 Brookfield Compressor Station Modifications

1.2.2.2.1 Operation / Permanent Easement

Based on preliminary design, Iroquois estimates that the modifications to the Brookfield Compressor Station will increase the compressor station yard area from 1.37 acres to 1.81 acres. Construction would require approximately 0.76 acres of total construction workspace. Of this total, approximately 0.44 acres would be required for operation inside the permanent fence. All of the proposed construction activities are expected to take place on land owned by Iroquois. Iroquois proposes to restore the temporary work areas following the completion of construction in accordance with the 2003 FERC Upland Erosion Control, Revegetation, and Maintenance Plan ("Plan") and Wetland and Waterbody Construction and Mitigation Procedures ("Procedures") and recommendations received from the U. S. Natural Resources Conservation Service ("NRCS").

1.2.2.2.2 Temporary Workspace / Staging Areas

Approximately 0.32 acres of the required 0.76 acres of total construction workspace will be used for temporary workspace during construction and located outside of the permanent fence.

1.2.2.2.3 Access Roads

Iroquois anticipates accessing the Brookfield Compressor Station site via High Meadow Road and does not foresee the need for any new access roads to facilitate the construction and operation of the proposed compressor station modifications.

TABLE 1.2-1
LAND REQUIREMENTS FOR THE PROPOSED 08/09 EXPANSION PROJECT
PIPELINE LOOP SEGMENTS AND ABOVEGROUND FACILITIES

Facility	Length (Miles) / Number of Sites	Temporary Workspace During Construction (acres)	Land Affected During Operation (acres)	Total
BOONVILLE, NY LOOP SEGMENT				
Pipeline	5.8	35.2	45.1	80.3
Pipeyard / Equipment Yard	3	28.1	0.0	28.1
Additional temporary workspace areas	12	1.6	0.0	1.6
Access Roads	3	1.9	0.0	1.9
Tie-in valves	2	0.4	0.2	0.6
Subtotal:		**67.2**	**45.3**	**112.5**
WRIGHT, NY LOOP SEGMENT				
Pipeline	1.0	5.1	12.4	17.5
Pipeyard / staging areas	1	5.1	0.0	5.1
Additional temporary workspace areas	11	5.2	0.0	5.2
Access Roads	1	0.0	0.6	0.6
Tie-in valves	2	0.4	0.2	0.6
Subtotal:		**15.8**	**13.2**	**29.0**
NEWTOWN, CT LOOP SEGMENT				
Pipeline	1.6	3.1	18.0	21.1
Pipeyard / staging areas	2	7.0	0.0	7.0
Additional temporary workspace areas	0	0.0	0.0	0.0
Access Roads	0	0.0	0.4	0.4
Tie-in valves	2	0.4	0.2	0.6
Subtotal:		**10.5**	**18.6**	**29.1**

TABLE 1.2-1
LAND REQUIREMENTS FOR THE PROPOSED 08/09 EXPANSION PROJECT
PIPELINE LOOP SEGMENTS AND ABOVEGROUND FACILITIES

Facility	Length (Miles) / Number of Sites	Temporary Workspace During Construction (acres)	Land Affected During Operation (acres)	Total
MILFORD, CT COMPRESSOR STATION				
Compressor Station	1	0.75	3.11	3.86
Extra workspace areas	1	0.9	0	0.9
Access Roads[a]	0	0	0	0
Subtotal:		**1.65**	**3.11**	**4.76**
BROOKFIELD, CT COMPRESSOR STATION MODIFICATIONS				
Compressor Station Modifications	2	0.32	0.44	0.76
Extra workspace areas	0	0	0	0
Access Roads[b]	0	0	0	0
Subtotal:		**0.32**	**0.44**	**0.76**
PROJECT TOTAL		**87.7**	**94.0**	**181.6**

[a] The Milford Compressor Station will be accessed directly from an existing roadway.
[b] The Brookfield Compressor Station will be accessed directly from an existing roadway.

TABLE 1.2-2
LAND REQUIREMENTS FOR THE 08/09 EXPANSION PROJECT
BOONVILLE LOOP SEGMENT

Facility	ROW Cross-Section[a]		Length (Linear Feet)	Land Affected During Construction[b] (acres)	Land Affected During Operation[c] (acres)
	Drawing Number	Mileposts			
Pipeline	Figure 1-1-ROW Figure 1-2-ROW	0.0-5.8	30,655	112.5	45.3
	Total		**30,655**	**112.5**	**45.3**

TABLE 1.2-2B
LAND REQUIREMENTS FOR THE 08/09 EXPANSION PROJECT
WRIGHT LOOP SEGMENT

Facility	ROW Cross-Section[a]		Length (Linear Feet)	Land Affected During Construction[b] (acres)	Land Affected During Operation[c] (acres)
	Drawing Number	Mileposts			
Pipeline	Figure 2-1-ROW Figure 2-2-ROW	0.0-1.0	5,193	29.0	13.2
	Total		**5,193**	**29.0**	**13.2**

TABLE 1.2-2C
LAND REQUIREMENTS FOR THE 08/09 EXPANSION PROJECT
NEWTOWN LOOP SEGMENT

Facility	ROW Cross-Section[a]		Length (Linear Feet)	Land Affected During Construction[b] (acres)	Land Affected During Operation[c] (acres)
	Drawing Number	Mileposts			
Pipeline	Figure 3-1-ROW Figure 3-2-ROW Figure 3-3-ROW Figure 3-4-ROW	0.0-1.6	8,536	29.1	18.6
		Total	**8,536**	**29.1**	**18.6**

1.3 CONSTRUCTION PROCEDURES

Construction methods will be implemented on the Project in accordance with the conditions outlined in the FERC Wetland and Waterbody Construction and Mitigation Procedures ("Procedures") and Erosion Control, Revegetation and Maintenance Plan ("Plan") (January 2003 Versions) (See Volume II - Appendix C). Proposed deviations from the FERC Plan and Procedures are not anticipated at this point in time. This Section is for descriptive purposes only. Actual equipment and methods may vary in the field based on final design and federal, state and local permit conditions and approvals.

1.3.1 General Pipeline Construction Procedures

Construction of the pipeline facilities for Phase 1 of the 08/09 Expansion Project will typically begin with the marking or staking of the construction corridor. As the marking is completed, it will be sequentially followed by these operations: clearing, fencing, grading, trenching, stringing, bending, welding, pipe laying, lowering-in, tie-in, coating, backfilling, testing (hydrostatic), cleanup and restoration. Areas typically requiring special construction techniques may be one or more of the following: road, railroad, or foreign line (utility) crossings; waterbodies and wetlands; unusual topographies such as unstable soils and trench conditions, residential or urban areas; agricultural areas; areas requiring rock removal; and permanent recreation facilities.

1.3.1.1 Marking the Corridor

Land survey crews will mark the boundaries of the construction corridor and ATWS areas with flags and/or stakes to define the approved work limits. Marking paint may also be used at road crossings. In addition, avoidance areas such as wetland boundaries, cultural resource sites and rare species habitat will be marked with appropriate fencing, signage and/or flagging based on environmental and archaeology surveys and environmental permit conditions.

The centerline for the pipeline will be marked at frequent intervals as well as known crossings of foreign lines and utilities by the proposed pipeline, at road crossings and at points of intersection ("PI"). Pipeline locators and other methods will be used to identify the foreign crossings.

1.3.1.2 Clearing, Grading and Fencing

The construction corridor will be cleared and graded to remove brush, trees, roots and other obstructions such as large rocks and stumps. Non-woody vegetation may be mowed to ground level. Temporary fences and gates will be installed as needed.

Timber will be removed only within designated construction corridor or workspace. Merchantable timber may be limbed, cut and either removed from the affected area or windrowed along the ROW. Timber that is not merchantable and other vegetative debris may be chipped or disposed of according to applicable regulations. Stumps and other timber considered to be non-merchantable will be properly disposed. Disposal of materials taken off-site will be done at commercial facilities or at other locations approved by FERC.

Access to the construction corridor will normally be obtained via public roads that intersect the property indirectly through abutting properties. Permission will be obtained from landowners for the use of access roads across their property to the construction corridor, and also for cutting trees and erecting temporary gates along access roads where necessary. After the construction corridor has been cleared and the stumps removed, grading may be necessary. Minimal grading will be required in flat terrain. In areas with steep terrain, more extensive grading may be required.

1.3.1.3 Trenching

Backhoes or other mechanical equipment will be used to excavate the trench. The depth of the trench will vary depending on soil type and construction techniques, allowing for depth of cover over the top of the pipeline to meet or exceed Federal Department of Transportation requirements.

Before commencement of construction activities, one-call systems for the States of Connecticut and New York will be contacted to have underground utilities and foreign pipelines identified and marked. Trenching in the vicinity of these foreign utilities will only begin after completing the appropriate notification procedures. The FERC Upland Erosion Control Plan ("FERC Plan") (See Volume II – Appendix C) will be followed to minimize erosion during trenching operations and construction activities.

1.3.1.4 Pipe Stringing

Prior to construction, pipe is moved into the project area by truck and placed in pipe storage yard(s). The pipe laying or short length stringing operation involves transporting pipe sections (joints) from the designated pipe storage yards into position along the prepared construction corridor. Typically, trucks or other vehicles will travel along the construction corridor and lay or string the individual joints parallel to the centerline of the trench so that they are easily accessible to construction personnel. The joints are typically strung on the working side of the trench to allow for bending, welding, coating and lowering-in operations and the associated inspection activities.

1.3.1.5 Bending, Welding, Coating, and Lowering-In

Typically, pipe will be delivered to the construction area in straight sections where it is then bent to conform to changes in the pipeline alignment and to conform to natural ground contours. Bending of the sections is typically performed either by track mounted hydraulic pipe-bending machines, or utilizing induction bends where workspace is limited.

Each welder will be qualified in accordance with federal regulations using approved welding procedures. The pipe joints will be welded together using qualified welding procedures. Qualified inspectors will perform inspection of the pipe welding. Bending, welding, and coating in the field will comply with DOT CFR Title 49, Part 192.

The pipe is protected with an external coating designed to protect the pipe from corrosion. Except for a small area at both ends of each pipe joint, this coating is generally applied at the pipe mill before shipment to the site. The weld locations are coated in the field with similar or compatible materials. The pipe coating is inspected for defects and repaired prior to backfilling.

Once the pipeline has been welded together, coated and inspected, the pipe is lowered into the trench. If the bottom of the trench is rocky, methods to protect the pipe will be used including the possible use of sandbags or support pillows at designated intervals along the trench. Trench dewatering may be required in certain locations to prevent the pipe from floating and also to perform certain limited activities in the trench. Trench dewatering will be performed in accordance with FERC Procedures.

1.3.1.6 Backfilling

After lowering the pipe in the trench, the trench will be backfilled. Backfill usually consists of the material originally excavated from the trench; however, in some cases additional backfill from other sources may be required. Any excess excavated materials or materials unsuitable for backfill will be spread evenly over the construction corridor or disposed of in accordance with applicable regulations. In areas where topsoil has been segregated, the subsoil will be placed in the trench first and then the topsoil will be placed over the subsoil. Backfilling will occur to approximate grade; however, a soil crown may be placed above the trench at the discretion of the Iroquois inspector to accommodate any future soil settlement.

1.3.1.7 Final Tie-Ins

After hydrostatic pressure testing of the pipeline has been successfully completed, the pipeline will be dewatered, using dewatering pigs, and then dried. Final tie-in welds to the existing Mainline will then be completed.

1.3.1.8 Purge and Load

Typically, there will be minor, temporary natural gas venting associated with the purge and load phase of the Project. This activity involves removing air from the system by displacing it with natural gas.

1.3.1.9 Clean-up and Restoration

After the completion of backfilling, disturbed areas will be final graded, and any remaining trash and debris will be properly disposed in compliance with federal, state, and local regulations. The construction corridor will be protected through the implementation of erosion control measures including site specific contouring, permanent slope breakers, mulching, and reseeding or sodding with soil-holding vegetation. Contouring will be accomplished using acceptable excess soil from construction. If sufficient soil is not available, additional soil will be obtained from approved sources.

Iroquois will restore the construction workspace in accordance with the FERC Plan, applicable seed mix requirements from the National Resource Conservation Service or applicable state Soil and Water Conservation District, and relevant landowner agreements (See Volume II – Appendix B).

1.3.1.10 Corrosion Protection

Cathodic protection test stations, rectifiers, and pipeline markers will be located along the pipeline corridor and installed in accordance with 49 CFR 192.

1.3.1.11 Pipeline Depth

The pipeline will be installed with a depth of burial in accordance with CFR Part 192. Depths typically range from 24 inches of cover in bedrock areas to 36 inches in most other areas. The pipeline will be installed to additional cover depth in specified areas to achieve adequate clearance for specific agricultural operations and under existing utilities, roads, railways, and foreign pipelines.

1.3.1.12 Tie-in Valve Assemblies

Valve assemblies will be installed at the beginning and end of each loop section. These valve assemblies will provide for the isolation and pressure reduction of the loop piping without affecting the mainline piping. The valve assemblies will be pre-fabricated offsite or in an onsite project staging area. These assemblies will then be tied into the mainline and looping piping. In addition, the looping sections will be designed to accommodate launching and receiving facilities to be installed in the future if necessary. This will allow for the passage of internal pipeline inspection tools for routine maintenance and inspection as required to monitor integrity of the pipeline.

The sequence of events to install the valve assemblies will generally be as follows:

- If necessary, a permanent access road will be constructed to the site. Typically these facilities are located immediately adjacent to existing Iroquois facilities;
- The site will be cleared and graded and erosion control devices will be installed;
- The site will be excavated;
- Foundations for the valves and blowdowns will be installed;
- The existing Iroquois Mainline will either be depressurized and made safe for installation of a tee fitting, or will receive a hot-tap tee assembly;
- Valve assemblies will be installed;
- Prior to installation the gas piping will be tested to a pressure greater than the maximum allowable operating pressure in accordance with 49 CFR 192;
- The construction site will be final graded and fencing will be constructed; and,
- Final site cleanup and restoration will be performed, as appropriate.

1.3.2 Special Pipeline Construction Methods

1.3.2.1 Unstable Soils

Some parts of the proposed alignment may contain unstable soils resulting from non-cohesive material and/or a high groundwater table. For the purposes of this discussion, unstable soils are soils that present instabilities during construction only and not to long term instabilities that would affect the integrity of the installed pipeline.

These soil conditions may result in one or more of the following impacts to the Project:

- additional construction safety hazards that need to be addressed;
- the need for supplemental weighting or pipe restraints to provide negative buoyancy;
- unstable trench and excavation side slopes resulting in wide trench widths and bore-pit excavations and extensive dewatering to inspect the pipe trench; and,
- complicated road bores.

Iroquois may consider the use of the following specialized construction procedures to mitigate the effects of unstable soils. These techniques include:

- Specialized dewatering techniques such as well points or vacuum well points in high groundwater table areas where entry into a trench is required. The use of well points represents considerable time and expense and accordingly is limited to use in small discrete areas such as borepits for road crossings. Any necessary approvals for discharge of the collected groundwater as well as the use of appropriate erosion control measures to mitigate impacts associated with discharge will be acquired prior to implementation.
- Weighting of the pipe utilizing concrete coating or set-on weights has been the traditional manner in which negative buoyancy has been achieved. However, anchoring methods that provide the same or greater degree of pipe support have also been used successfully in the past.

Accordingly, efforts will be made to avoid unstable areas or to mitigate the instabilities with adequate workspace, wherever practicable.

1.3.2.2 Confined Workspace Areas in Residential Areas

Portions of the proposed pipeline alignment may be located in residential areas that warrant the use of specialized construction techniques to minimize potential impacts to private properties, infrastructure and roadways. Temporary impacts on residential properties could include: disturbance to lawns; removal of fences, mailboxes, and other minor residential accessory structures; removal of ornamental shrubs; the removal of shade trees; the cutting of streets, driveways, and sidewalks; disruption of household utilities; altered traffic patterns; and the noise and timing of construction activities.

Special residential construction techniques, as summarized below, will be utilized to minimize the extent of the disturbance. Following construction, residential areas will be restored in accordance with the FERC Plan (See Volume II – Appendix C) and individual landowner agreements, and Iroquois will exercise special care during construction clean up.

- Drag section construction will be considered to reduce temporary workspace requirements. Drag section construction involves welding two or more sections of pipe together in an area away from residences and then carrying the joined pipe into place for installation. Drag section construction reduces both the amount of required workspace near a residence and the time residential property must be disturbed for construction; and,
- Stovepipe construction may be used in sensitive areas. Stovepipe construction involves installing one or two joints of pipe at a time. The pipeline ditch is dug just ahead of construction. One or two joints of pipe are carried into place, lowered into the ditch and welded. The ditch is then immediately backfilled. Stovepipe construction reduces the amount of property disturbed at any one time but tends to be significantly slower and more expensive than other construction techniques. It is best suited for situations where the available workspace is extremely limited.
- Depending on weather and ground conditions, immediately after backfilling, residential areas will be restored, and all construction debris will be removed. Topsoil in landscaped lawns will either be segregated or imported. Compaction testing will be performed and soil mitigation will be performed as necessary in severely compacted areas. Lawns will be raked, topsoil added as necessary, and restored per landowner agreements. Ornamental shrubs will be replaced when possible. Fences, mailboxes, and other structures that have been removed will be restored. Sidewalks, driveways and roads will be restored as soon as practical.

1.3.2.3 Active Crops

Approximately seven percent of the proposed Project will be constructed in areas of active croplands and pasture. All proposed activity within agricultural land occurs within the New York loop segments. Of this, approximately 25 acres will be temporarily impacted during construction of the proposed Project. Specialized construction methods are described in the FERC Plan (See Volume II - Appendix C). The construction ROW width through agricultural land may be increased to allow for topsoil segregation. Additionally, Iroquois will consult with the New York State Department of Agriculture and Markets relative to construction within active agricultural land in New York.

1.3.2.4 Road and Railroad Crossings

The proposed construction of the 08/09 Expansion Project will require several road and driveway crossings that are depicted on the aerial alignment sheets (See Volume III – Appendix M). Temporary impacts upon traffic and transportation facilities and public inconvenience at crossings will be minimized to the extent practicable, and appropriate safety procedures will be implemented to protect Iroquois' personnel, construction contractors and the public. Traffic warning signs, detour signs, police details and other traffic control devices will be used where required by federal, state, and local Departments of Transportation or other regulating bodies. Road crossings will be completed in accordance with the requirements of road crossing permits.

Iroquois proposes to cross public roads using open cut or horizontal bore techniques. During boring operations the road will remain open to traffic. A boring machine will make a hole beneath the roadbed for the pipe. If required, bore pits will be excavated on each side of the road large enough to handle the boring and receiving equipment.

Where allowed by regulatory agencies, roads where conditions are unsuitable for boring and/or lower-volume residential streets will be open-cut. Where feasible, an open cut will involve crossing the road in stages such

that at least a single lane of traffic is maintained throughout the crossing procedure. During construction, efforts will be made to minimize temporary delays, public inconvenience and disruption of traffic flow. At these crossings, appropriate safety precautions will be taken as required by regulatory agencies such as the use of flag men, night flashers, and markers. Open-cut roads will be reconstructed properly and inspected to ensure the stability of the roadway.

Other underground utilities will be identified and located to the greatest extent practical prior to the commencement of construction. Care will be taken to avoid damage to and disruption of other utility services during construction. The use of rapid set flowable fill (ACI 229R-99) may be considered under specific construction conditions, which would allow open cutting of more significant roadways with minimal disruption.

1.3.2.5 Blasting

Rock encountered during trenching will be removed using one of the following techniques. The technique selected is dependent on relative hardness, fracture susceptibility, expected volume and location. Techniques include:

- Conventional excavation with a backhoe;
- Ripping with a bulldozer followed by backhoe excavation;
- Hammering with a pointed backhoe attachment or a Pneumatic rock hammer and followed by backhoe excavation;
- Blasting followed by backhoe excavation; or
- Blasting surface rock prior to excavation.

All blasting activity will be performed according to strict guidelines designed to control energy release. Proper safeguards will be taken to protect personnel and property in the area. Refer to Resource Report 6 – Geological Resources for details relative to blasting. Charges will be kept to the minimum required to break up the rock based on type and hardness. Mats made of heavy steel mesh or other materials are effective in preventing scattering of rock and debris and will be used as necessary. These activities will strictly adhere to all local, state, and federal regulations applying to controlled blasting and blast vibration limits with regard to structures and underground utilities. Special care will be taken to monitor and assess blasting within 150 feet of dwellings and private or public water supply wells.

Large rock not suitable for use as backfill material will either be windrowed along the edge of the ROW with landowner permission, buried on the ROW, scattered along the ROW with landowner permission or hauled off the ROW and disposed at an approved location. The remaining rock will be mixed with the subsoil and used to backfill the trench to the original level of rock. Prior to construction, Iroquois shall develop a rock disposal plan that will address the handling and disposition of excess rock generated by construction activities associated with the pipeline loops.

1.3.2.6 Wetland Crossing Construction

Wetland locations along the proposed pipeline alignment are described in Resource Report 2 (Water Resources) and shown on the aerial alignment sheets. Pipeline construction across wetlands will be preformed in accordance with the FERC Procedures. Construction will also follow the Spill Prevention, Control and

Countermeasure Plan ("SPCC") and a Stormwater Pollution Prevention Plan ("SWPPP") to be developed prior to construction in accordance with requirements of the NYSDEC and CTDEP.

1.3.2.7 Hydrostatic Testing

Testing of newly constructed natural gas pipelines is required by 49 CFR Part 192 - Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards. Iroquois anticipates that the testing medium for the 08/09 Expansion Project will be water.

During detailed design, a hydrostatic testing plan and procedure will be developed that identifies the number and location of test sections. Determination of the exact locations of test sections depends on several factors including main line valve location, elevation differences along the route, available water sources and construction constraints.

- Iroquois expects to arrange for delivery of water from municipal water systems or local water bodies in accordance with applicable regulations and restrictions. Test water will be obtained only from appropriate and approved sources, and will be withdrawn at a rate that will not draw down the source to below minimum levels. Test water intake and discharge will be in accordance with applicable state and federal discharge regulations and FERC guidance.

The following additives are normally not required unless hydrostatic test water remains in a pipeline segment for an extended period, but they may be used for the purposes indicated. Any applications for permission to discharge hydrostatic test water would include information regarding any planned additives, and discharge would be conducted in accordance with applicable regulatory approvals and conditions.

- Corrosion inhibitor: coats inside steel surface to inhibit normal corrosion process.
- Oxygen scavenger: removes oxygen from test water, greatly reducing corrosion rate.
- Micro-biocide: removes bacteria that might pose a corrosion hazard from substances secreted.

After the testing is complete, the water in the pipeline will be discharged using dewatering pigs, and the pipeline will be dried. If it is not possible to discharge water into properly prepared discharge areas in upland sites using erosion controls, the water will be discharged into a municipal storm water drainage system in accordance with agreements with municipal officials and applicable federal, state, and local requirements. In special cases where discharge to adjacent upland sites or municipal stormwater systems is not allowed, transportation to off-site disposal locations or facilities by truck may be required.

1.3.3 Aboveground Facility Construction and Modifications

1.3.3.1 Clearing and Grading

The sites for the additional compressor units and temporary workspaces will be cleared of vegetation and graded as necessary to create level surfaces for the movement of construction vehicles on the sites and to prepare the areas for the building foundations. Iroquois will install silt fence and/or hay bales around disturbed areas, as appropriate to the land, soil and weather conditions, to minimize the potential for erosion and for impacts to off-site wetlands and watercourses (refer to Section 1.3.1.9). Erosion and sediment controls will conform to FERC requirements and Iroquois' stormwater pollution prevention plans. Blasting may be required to prepare a level site area. Such blasting, if required, will be conducted in accordance with appropriate regulations.

1.3.3.2 Foundations

Building foundations are likely to be constructed of poured reinforced concrete. Topsoil, if present, would be stripped from the area of the building foundations. Such soil may be used on-site either for landscaping or to provide soil cover for the septic system leach field, if acceptable. Additional soil or subsurface materials may be imported from approved sources to achieve the desired site/foundation grade.

1.3.3.3 Building Design and Construction

The compressor buildings are expected to be approximately 40 feet wide by 65 feet long, with a roof peak to grade height of approximately 45 feet. Each compressor building will house one 10,310 [nominal] horsepower natural gas fueled turbo-compressor package.

The proposed turbine exhaust stacks were initially designed with a stack height of 50 feet. Iroquois has performed air quality impact modeling to support its applications to the CTDEP for air permits to construct and operate the proposed turbo-compressors. Air quality modeling reports were submitted to the CT DEP as part of Iroquois' air permit applications. The modeling reports document that the proposed stack heights and other design parameters achieve acceptable dispersion of turbine exhaust emissions to comply with ambient air quality regulations and standards. The compressor unit design will incorporate various safety features, discussed in Section 1.4 of this Resource Report.

Typically, the steel frames would be erected, followed by the installation of the roofs, interior skin, insulation, and exterior skin. Cutouts for protrusions through the siding (e.g., inlet and exhaust vents) would be flashed to ensure that the buildings would be weather-tight. It is possible that Iroquois will construct the buildings using a steel frame, masonry walls and exterior sheet metal facade. This will be determined during the detailed design phase of the Project.

1.3.3.4 High Pressure Piping

Iroquois proposes to design and construct the high pressure piping to meet the requirements of the U.S. Department of Transportation (DOT) 49 CFR Part 192 requirements. Iroquois proposes to design the high pressure gas piping in the station yards for a maximum allowable operating pressure (MAOP) of 1,480 pounds per square inch gauge (psig). Iroquois proposes to coat the station piping for protection against corrosion. In addition, Iroquois anticipates the installation of a cathodic protection system to protect the buried piping.

1.3.3.5 Pressure Testing

Prior to placing the station in-service, Iroquois proposes to conduct pressure testing of the piping system. Iroquois proposes to conduct this test in accordance with applicable codes.

1.3.3.6 Infrastructure Facilities

The installation of the infrastructure facilities includes the various compressor and auxiliary equipment, piping, and other electrical and mechanical systems. Iroquois anticipates that new electric, telephone and domestic water utility lines will be installed at the Milford site. These utilities will already exist at the Brookfield site as part of the compressor station construction associated with the MarketAccess Project.

1.3.3.7 Control Checkout and Engine Startup

Before the new compressor units are put into service, Iroquois proposes to develop and implement station commissioning plans. Iroquois anticipates that these plans would include the checking and testing of controls and safety features including the emergency shutdown system, relief valves, gas and fire detection facilities, over-speed, vibration, and other on- and off-engine protection and safety devices.

1.3.3.8 Final Grading and Landscaping

Prior to construction, Iroquois will develop plans for the final grading and landscaping of the areas that will be disturbed during construction. This final grading and landscaping plans will be consistent with the FERC (1994) Plans and Procedures for the restoration of uplands.

A number of activities are expected to be performed as part of the completion of the construction work. After the completion of these activities and the start-up and testing of the new compressor units, or as soon thereafter as weather and other conditions permit, Iroquois proposes to perform the final grading and landscaping of the compressor station sites, in accordance with the above-mentioned plans.

1.3.3.9 Erosion Control Procedures

During the construction of the proposed compressor stations, Iroquois will adhere to the applicable provisions of FERC (2003) Plans and Procedures. A copy of the FERC Plans and Procedures is provided in Volume V - Appendix C. As set forth in the above-cited plans, Iroquois proposes to install appropriate erosion controls (e.g., silt fence and/or hay bales) to minimize the potential for erosion from construction of the facilities and access road.

1.3.4 Construction Schedule and Workforce

1.3.4.1 Pipeline Facilities

The anticipated construction period for the pipeline loop segments of the 08/09 Expansion Project is Summer 2008 to Fall 2008, with the commercial operation of the pipeline segments scheduled to begin in November 2008. Iroquois anticipates one main construction spread per loop segment with a workforce of approximately 50 to 75 personnel per spread. One main construction spread per segment will be responsible for construction of the pipeline loop and the associated valve facilities. Additional dedicated crews may be responsible for bored crossings, road re-paving and other tasks during construction (note that these crews are included within the overall workforce estimate of 50 to 75 people per loop segment). Iroquois and / or its contractors will hire construction workers that have the skills necessary for pipeline construction, as needed. This will include hiring local workers when practicable. The types of jobs that may be provided by the workforce include construction managers, inspectors, welders, operators, laborers, surveyors, and landscapers. Any increase in temporary population levels from non-local workers in the area will be relatively short in duration, as the looping phase of the 08/09 Expansion Project is expected to take less than one year to construct. Environmental inspectors will be assigned per FERC requirements.

1.3.4.2 Aboveground Facilities

1.3.4.2.1 Milford Compressor Station

The anticipated construction period for the Milford Compressor Station component of the 08/09 Expansion Project is June 2008 to December 2008, with the commercial operation of the compressor station scheduled to begin prior to January 2009. Iroquois anticipates a total workforce of approximately 50 personnel during construction of the compressor station. Iroquois and/or its contractors hire construction workers that have the skills necessary for pipeline construction, as needed. This will include hiring local workers when practicable. The types of jobs that may be provided by the local workforce include welders, operators, laborers, surveyors, and landscapers. Any increase in temporary population levels from non-local workers in the area will be relatively short, as the Project is expected to take less than one year to construct. Environmental inspector(s) will be assigned the compressor station site per FERC requirements.

1.3.4.2.2 Brookfield Compressor Station Modifications

The anticipated construction period for the modifications to the Brookfield Compressor Station component of the Project is Spring 2009 to Fall 2009, with the commercial operation of the compressor station scheduled to begin in November 2009. Iroquois anticipates a total workforce of approximately 30 personnel during construction. Iroquois and/or it contractors hire construction workers that have the skills necessary for pipeline construction. To the extent practicable, workers will be from the local areas. The types of jobs that may be provided by the local and non-local workforce include welders, operators, laborers, surveyors, and landscapers. Any increase in temporary population levels from non-local workers in the area will be relatively short. Environmental inspector(s) will be assigned to monitor the construction of the compressor station modifications per FERC requirements.

1.3.5 Environmental Compliance, Training, and Inspection

Iroquois will incorporate environmental requirements in construction documents, will conduct environmental training, will employ environmental inspectors, and will provide routine monitoring during all phases of construction, clean up and restoration.

Iroquois will develop spread-specific environmental requirements that will be part of the construction bid documents. These environmental documents will include the 2003 Plan and Procedures (with approved exceptions/variances), the FERC certificate conditions, and other environmental permits and requirements received to date. During pre-bid meetings with construction contractors, Iroquois will communicate to prospective contractors the environmental requirements for this project. Pre-bid communication with contractors, combined with the proposed contents of the construction contracts will assist contractors to incorporate applicable requirements into their bids. If a contractor is in violation of an environmental requirement during execution of duties on the behalf of Iroquois, Iroquois will demand immediate correction of the problem, issue a stop work order if necessary, resolve any discipline issue with the contractor and make appropriate agency notifications as needed.

Prior to the commencement of construction activities, Iroquois will conduct environmental training for the inspectors to familiarize them with the specific conditions and issues. Training of contractor personnel will also be performed to ensure that contractor personnel are familiar with the environmental requirements of this project. As new personnel are assigned to this Project, Iroquois will conduct additional training for these personnel as well.

Iroquois considers the role of the Environmental Inspection group to be a critical part of the Construction Management Team. During construction, Environmental Inspectors have the authority to assess and evaluate any construction related activity to confirm compliance to the environmental conditions of local, state or federal agency permits or certificates. Environmental Inspectors will observe and report on the day-to-day activities of the Construction Contractors that relate or may affect a condition of an environmental permit or certificate. Environmental Inspectors will attend daily meetings as necessary. Environmental Inspection staff for this project will report to Iroquois' Environmental Resources Department and will keep the Chief Construction Inspector informed of environmental related activities pertaining to the construction contracts on a daily basis. The Environmental Inspectors and members of Iroquois' Environmental Resources Department have stop work authority during all phases of construction.

Iroquois will be responsible for the selection, employment, training and guidance of the personnel on the Environmental Inspection Team. The duties of the Environmental Inspectors are to monitor and report on those activities designated within the environmental scope of work in the construction contracts and include aspects such as erosion control, re-vegetation, wetland signage, environmental permit compliance, threatened and endangered species protection and restoration.

1.4 OPERATIONS AND MAINTENANCE

Iroquois proposes to operate and maintain the proposed facilities in accordance with standard procedures designed to ensure the integrity of the pipeline and to provide its customers and the general public with a safe and dependable natural gas supply. Iroquois' facilities will be designed, constructed and operated in accordance with requirements of the FERC, the U. S. Department of Transportation ("USDOT") Pipeline and Hazardous Materials Safety Administration (PHMSA) in accordance with 49 CFR Part 192, and industry-proven practices and techniques. Responsibilities of Iroquois will include:

1) operation and maintenance of pipeline and aboveground facilities;
2) integrity inspection of the pipeline system;
3) regular monitoring of the ROW;
4) development and implementation of an ongoing program of safety and environmental compliance;
5) compliance maintenance inspections and records;
6) emergency preparedness and management;
7) administration; and,
8) landowner relations.

Project facilities will be marked and identified in accordance with applicable regulations. Liaison will be maintained with the public as well as with government agencies having jurisdiction over areas traversed by the pipeline. Overall, maintenance activities will be in compliance with requirements of the FERC Upland Erosion Control, Revegetation, and Maintenance Plan, as well as other applicable regulatory requirements.

1.4.1 Pipeline Facilities

1.4.1.1 Routine Patrols

Periodic patrols will be conducted to visually inspect for the following: possible leaks, evidence of excavation activity on or near the permanent ROW, erosion and wash-out areas, areas of sparse vegetation, damage to permanent erosion control devices, exposed pipe and other potential concerns that may adversely affect the safety and operation of the pipeline. Population changes will also be monitored in areas crossed by the pipeline and class locations modified as necessary. Pipeline markers and signs will be inspected, maintained and replaced as necessary. Repairs to the pipeline easement may include re-grading and reseeding with appropriate plant species or installing other soil stabilization measures.

1.4.1.2 Corrosion Prevention/Detection

Periodic surveys will also be conducted to ensure the continuity of the cathodic protection system and to indicate where possible corrective action may be required.

Cathodic protection will typically be provided by ground beds located on or near the pipeline easement and may be supplemented at some locations with magnesium/zinc anodes or similar facility attached to the pipe. Iroquois will manage the program to ensure that it meets or exceeds the requirements of 49 CFR Part 192.

1.4.1.3 Vegetation Management

Iroquois maintains its permanent/operational easement on a regular basis (typically once every three to five years) to allow for visual inspections and maintenance activities. In most cases, such as agricultural areas, the permanent easement will be returned to its previous use. However, in areas where the pipeline route crosses forested land, the designated permanent easement will be maintained as grassland. Mechanical vegetation control will be used to maintain vegetation in an herbaceous state on the easement and to prevent the growth of trees in these areas. Within wetland areas, a pipeline integrity corridor ten feet in width, centered over the pipeline will be maintained in an herbaceous state to facilitate pipeline inspection and maintenance.

1.4.1.4 Operations Monitoring and Records

The 08/09 Expansion Project pipeline facilities will be remotely monitored in conjunction with operation of existing pipeline facilities using Supervisory Control and Data Acquisition ("SCADA") systems manned 24 hours per day. Operation and maintenance records will be maintained per the requirements of 49 CFR Part 192.

1.4.2 Aboveground Facilities

Iroquois will operate and maintain the proposed facilities in accordance with standard procedures designed to ensure the integrity of the compressor stations and to provide its customers and the general public with a safe and dependable natural gas supply. Iroquois facilities will be designed, constructed and operated in accordance with requirements of the FERC, the U. S. Department of Transportation ("USDOT") Office of Pipeline Safety ("OPS"), industry-proven practices and techniques, and other federal, state, and local requirements as applicable. Responsibilities of Iroquois would include:

1) operation and maintenance of pipeline and aboveground facilities safely to provide the required gas flow;

2) inspection and maintenance of the pipeline system;

3) regular monitoring of the ROW;

4) development and implementation of an ongoing program of safety and environmental compliance;

5) regulatory compliance maintenance inspections;

6) administration; and,

7) landowner relations.

In accordance with 49 CFR Part 192, the facilities will be regularly inspected for leakage as part of scheduled operations and maintenance. Iroquois proposes to follow various routine maintenance and operations procedures to ensure that the stations operate safely. Standard Iroquois operations at existing stations include activities such as the calibration, maintenance and inspection of equipment, as well as the monitoring of pressure, temperature, and vibration data, and traditional landscape maintenance such as mowing and application of fertilizer, etc. Standard Iroquois operations currently also include the periodic checking of safety and emergency equipment and cathodic protection systems.

Project facilities will be marked and identified in accordance with applicable regulations. Liaison will be maintained with the public as well as with government agencies having jurisdiction over the compressor stations. Overall, maintenance activities will be in compliance with requirements of the FERC Upland Erosion Control, Revegetation, and Maintenance Plan, as well as other applicable regulatory requirements. The compressor station will be linked to Iroquois' Supervisory Control and Data Acquisition (SCADA) system, which monitors the pipeline system on a 24-hour per day basis.

1.5 FUTURE PLANS AND ABANDONMENT

Iroquois does not have plans for future expansion of the facilities proposed in this docket or for the abandonment or removal of existing pipeline facilities. The 08/09 Expansion Project is in direct response to a KeySpan request for Iroquois to supply natural gas to its existing infrastructure in New York. If future expansion of facilities is required due to additional demand for natural gas services, such expansion may involve pipeline segments, compression, and/or cooling facilities. Any such future facilities will be designed to be compatible with Iroquois' existing facilities and will undergo the appropriate regulatory review.

1.6 AGENCY AND PUBLIC CONSULTATIONS/REQUIRED AUTHORIZATIONS

1.6.1 Agency / NGO Consultations

Iroquois is working with regulatory agencies, non-governmental organizations ("NGO") and other stakeholders in the planning process to solicit input and provide guidance to ensure the route selection methodology incorporated sound environmental siting criteria. At the federal level, these consultations have included U. S. Fish and Wildlife Service ("USFWS"), the U. S. Environmental Protection Agency ("USEPA"), and the Natural Resources Conservation Service ("NRCS"). Iroquois will continue to communicate with government agencies, private entities, community groups, and landowners in the area to discuss the Project throughout the NEPA review process. Additionally, Iroquois will coordinate with all

cooperating federal agencies relative to compliance with FERC Order 687. Volume II of this filing contains a copy of the Project's contact database (Appendix A) and project correspondence (Appendix B).

1.6.2 Public Participation Plan

Iroquois is in the process of preparing a Public Participation Plan for the 08/09 Expansion Project that may include open houses, presentations, and publishing information regarding the Project in local newspapers. Open houses were held in the Project area in April and May 2007 to provide information to the community and receive comments from the residents. As part of the open house process, Iroquois provided information regarding the FERC regulatory process and the NEPA Pre-Filing Process. Summary information from the open houses has previously been submitted to FERC as part of the pre-filing process.

In addition to the community outreach and the open houses, Iroquois' community outreach program includes the following elements:

- Flyers announcing open houses mailed to affected parties;
- Newspaper advertisements of open houses; these advertisements will be placed in newspapers of general circulation in the affected area;
- Newspaper advertisement prior to commencement of construction, which will be placed in those same publications;
- Notification to businesses potentially affected by construction;
- Post information on a project-specific web page within Iroquois' website - http://08-09.iroquois.com/ – with links to:

  1. General Project information
  2. Up to date construction schedule/location

  In developing its website, Iroquois intends to provide, among other items, information about the company and the 08/09 Expansion Project; a general explanation of the permitting process; copies of relevant documents; a frequently asked questions section; and links to related websites;
- Establish a dedicated 800 number to provide information and allow the caller to leave a message; and;
- Designation of a single point of contact for stakeholder communication.

1.6.3 Permits and Approvals

Construction contractors employed by Iroquois will be required to observe and comply with all federal, state and local laws, ordinances and regulations that apply to the conduct of the work. During the performance of work, contractors will comply with the Minimum Federal Safety Standards adopted by the DOT under the Natural Gas Pipeline Safety Act as well as Iroquois standards.

Iroquois will obtain all necessary permits, licenses and clearances relating to the placement of the pipeline across or under roads, drainage facilities, waterbodies, wetlands and through any other sites or places that a governmental license or permit may be required (See Table 1.6-1). Additionally, Iroquois will also acquire all applicable permits relative to the construction and operation of the proposed aboveground

facilities. Iroquois will include copies of all relevant environmental permits and approvals that have been received in the construction bid packages and contracts. The contractor will be required to be familiar with all permits and licenses obtained by Iroquois. The contractor will be required to comply with all the requirements related to the construction of the pipeline and compression facilities and to the restoration of any areas disturbed by the construction of the pipeline or compression facilities.

TABLE 1.6-1
POTENTIAL ENVIRONMENTAL PERMITS AND APPROVALS REQUIRED FOR THE 08/09 EXPANSION PROJECT FACILITIES

Agency	Permit/Approval	Activity	Date of Request or Application [1/]	Agency Approval/ Clearance Received
Federal				
Federal Energy Regulatory Commission	Certificate	Construct and Operate Compressor Station and pipeline looping	August 2007	TBD
U.S. Fish and Wildlife Service	Clearance under Section 7 of Endangered Species Act	General construction and operation of compressor station and pipeline looping	1/1/07	1/31/07 2/16/07
U.S. Army Corps of Engineers	Nationwide 12 or Individual Permit	Construction through or under wetlands [2/]	August 2007	TBD
New York				
New York State Department of Environmental Conservation	State Environmental Quality Review Act (SEQRA)	Activities involving a state action.	4th Quarter 2007	TBD
	Joint Permit Stream Disturbance Freshwater Wetlands 401 Water Quality Certificate	Construction through or under wetlands & waterbodies	August 2007	TBD

TABLE 1.6-1
POTENTIAL ENVIRONMENTAL PERMITS AND APPROVALS REQUIRED
FOR THE 08/09 EXPANSION PROJECT FACILITIES

Agency	Permit/Approval	Activity	Date of Request or Application [1/]	Agency Approval/ Clearance Received
	State Pollution Discharge Elimination System (SPDES) – General Permit for Stormwater Discharges from Construction Activities (GP-02-01)	Land disturbances greater than one acre and hydrostatic test discharges.	4th Quarter 2007	TBD
NYS Historic Preservation Office	Clearance under National Historic Preservation Act and State Historic Act	General construction and operation of compressor station and pipeline looping	August 2007	TBD
Connecticut				
Connecticut Department of Environmental Protection	Permits to Construct/Certificate to operate air contamination source	Air quality permit to construct and operate stationary natural gas turbo-compressor equipment	March 15, 2007 (Milford); April 26, 2007 (Brookfield)	TBD
	401 Water Quality Certificate	Construction through or under navigable waterbodies	August 2007	TBD
	General Permit (DEP-PERD-GO-015)	Discharge of stormwater and dewatering waste water from construction activities for sites one or more acres	4th Quarter 2007	TBD
	Diversion of Water for Consumptive Use General Permit (DEP-IWRD-GP-001)	Use of water for hydrostatic test	4th Quarter 2007	TBD
	Hydrostatic Test Discharge General Permit (DEP-PERD-GP-011)	Discharge of hydrostatic test water – one-time discharge.	4th Quarter 2007	TBD
	Clearance that no impacts to Rare Species and Habitat	General construction and operation of the proposed project.	2/26/07	TBD

TABLE 1.6-1
POTENTIAL ENVIRONMENTAL PERMITS AND APPROVALS REQUIRED
FOR THE 08/09 EXPANSION PROJECT FACILITIES

Agency	Permit/Approval	Activity	Date of Request or Application [1/]	Agency Approval/ Clearance Received
CT Siting Council	Preliminary Determination	Review Process for CSC Intervention and Comment on FERC Proceeding	July/August 2007	TBD
State Historic Preservation Office	Determination of no effect under National Historic Preservation Act and State Historic Act	General construction and operation of the facilities.	August 2007	TBD
Local [3/]				
Affected municipalities along Newtown Loop Segment	Inland Wetlands Permit	Construction through or under wetlands	4th Quarter 2007	TBD
Affected municipalities along Newtown Loop Segment	Stream Channel Encroachment Permit	Construction through or under navigable waterbodies	4th Quarter 2007	TBD
Municipalities affected in NY	Wetland Permit	Construction within 150 feet of locally jurisdictional wetlands and watercourses.	4th Quarter 2007	TBD
	Land Clearing Permit	Land disturbances and tree clearing.	4th Quarter 2007	TBD

Notes:

TBD – To be determined

[1/] Applications for Federal permits / clearances will be made in accordance with agreements made as part of the Order 687 compliance process.

[2/] Pending the results of the additional field surveys, Iroquois will seek a determination from the U. S. Army Corps of Engineers regarding jurisdictional wetlands located in the vicinity of the proposed pipeline alignment.

[3/] Local towns have various permitting requirements. Iroquois plans to coordinate with the Towns, and to comply with local laws, to the extent that compliance would not conflict or be inconsistent with FERC authorizations, certifications, or schedules.

1.7 AFFECTED LANDOWNERS

1.7.1 Land Owner Information

The names and addresses of all affected landowners relating to this project are provided in Volume V – Appendix P.

1.7.2 Landowner Survey Permission

1.7.2.1 Pipeline Facilities

Iroquois has contacted all applicable land owners where survey permission is needed to assess baseline conditions of the Project area. Iroquois has received survey permission for 100 percent of the three Loop segment project areas. The baseline surveys are complete and have included environmental, cultural, and engineering to assist in deciding upon a preferred route and identifying potential impacts of the 08/09 Expansion Project. For example, Iroquois' environmental consultant, ENSR, has conducted wetland surveys. Hartgen Archeological Associates, an archeological consulting firm retained by Iroquois, has completed their Phase 1A report.

1.7.2.2 Aboveground Facilities

1.7.2.2.1 Milford Compressor Station

Iroquois is the owner of the property where the Milford Compressor Station will be located; therefore no specific survey access permission is required. Iroquois has contacted all applicable abutting land owners where survey permission is needed to assess baseline conditions of the Project area. The baseline surveys are completed and included environmental, cultural, and engineering to assist in design of the compressor station facilities and to identify potential impacts of the 08/09 Expansion Project.

1.7.2.2.2 Brookfield Compressor Station Modifications

Iroquois is the owner of the property where the Brookfield Compressor Station modifications will be located; therefore no specific survey access permission is required. Iroquois has contacted all applicable abutting land owners where survey permission is needed to assess baseline conditions of the Project area. The baseline surveys are completed and included environmental, cultural, and engineering to assist in design of the compressor station facilities and to identify potential impacts of the 08/09 Expansion Project.

1.7.3 Landowner Notifications Regarding Section 7 Application Filing

Landowner notifications are required under Subpart A and Subpart F of Part 157 of the FERC's regulations and Section 7(c) of the Natural Gas Act. In accordance with these regulations, Iroquois will make a good faith effort to notify all affected landowners and local, state or federal jurisdictions that its Application has been submitted to FERC within the required time fames. As part of this notification, after the Application is filed, Iroquois will be mailing a package via first class mail to all affected landowners that contains the following items:

- A letter explaining the Project which describes its general route and its proposed schedule;
- A fact sheet describing Iroquois as a company;
- A listing of public locations where a copy of the Iroquois application can be viewed;
- A fact sheet with the FERC docket number, FERC contact numbers and Iroquois contact numbers;
- An overall project map;
- A USGS map section which more specifically orients Iroquois' nearby proposed facilities to the landowner's property; and,
- A copy of the Commission's brochure "An interstate natural gas pipeline on my land? What do I need to know?"

Iroquois will mail a package of this information to affected landowners, after a docket number is issued by the FERC. An affidavit to this effect is provided in Exhibit Z-2 in Volume I (Application). Iroquois will also provide the FERC with a copy of this mailing.

1.8 NON-JURISDICTIONAL FACILITIES

Iroquois is not currently proposing or aware of any non-jurisdictional facilities associated with the 08/09 Expansion Project.