

Dominion Transmission, Inc.
701 East Cary Street, Richmond, VA 23219



February 15, 2013

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

**Re: Dominion Transmission, Inc.
Allegheny Storage Project
Docket No. CP12-72-000
Implementation Plan**

Dear Secretary Bose:

By Order dated December 20, 2012, the Federal Energy Regulatory Commission (Commission) authorized Dominion Transmission, Inc. (DTI) to construct and operate certain facilities that comprise the Allegheny Storage Project (Project). *Dominion Transmission, Inc.* 141 FERC ¶ 61,240 (the "Order").

As required under Condition No. 6 of Appendix B to the Order, DTI hereby submits the Implementation Plan for the Project. This submission consists of the following documents:

- Volume I of II – Public Information and
- Volume II of II – Contains Privileged Information – Do Not Release.

DTI requests that, pursuant to 18 C.F.R. § 388.112, the information filed in Volume II be treated as privileged and confidential, and that it not be released to the public. This volume is labeled "Contains Privileged Information – Do Not Release" and contains information that is customarily treated as privileged and confidential.

If you have any questions, please contact me at 804-771-4416.

Respectfully submitted,

Amanda K. Prestage

Amanda K. Prestage
Regulatory and Certificates Analyst III

cc: Jessica Harris, FERC



Implementation Plan

Dominion Transmission, Inc.

Allegheny Storage Project
Maryland, Ohio, West Virginia, and Pennsylvania

Docket No. CP12-72-000

February 2013



Volume I of II

Public

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INTRODUCTION

Dominion Transmission, Inc. (DTI) is submitting this Implementation Plan to address the environmental conditions included in Appendix B to the Order Issuing Certificate (Order) issued by the Federal Energy Regulatory Commission (FERC or Commission) on December 20, 2012, for the Allegheny Storage Project (Project). This Implementation Plan addresses the FERC conditions that pertain to the following discrete Project facilities, as identified in the FERC Environmental Assessment (EA) dated June 15, 2012:

- Frederick County, Maryland facilities:
 - Myersville Compressor Station – new 16,000-horsepower (hp) station,
 - Myersville Suction/Discharge pipelines – 0.6 mile of 30-inch-diameter suction and discharge pipelines,
 - Myersville Valve Site – New valve site at the intersection of the Myersville Suction/Discharge pipelines and DTI's existing pipelines, and
 - Tuscarora Metering and Regulating (M&R) Station – Upgrade of the existing station.

- Monroe County, Ohio facilities:
 - Mullett Compressor Station – new 3,550 hp station,
 - Mullett Suction/Discharge pipelines – 0.5 mile of one 16-inch-diameter suction and one 10-inch-diameter discharge pipelines, and
 - Mullett 1 M&R Station – Upgrade of the existing station.

- Lewis County, West Virginia facilities:
 - Wolf Run Compressor Station – Install additional dehydration at the existing station.

- Tioga County, Pennsylvania facilities:
 - Sabinsville West Replacement – Replacement of 1.8 miles of 10- and 12-inch-diameter pipelines with 16-inch-diameter pipeline,
 - Sabinsville East Replacement – Replacement of 1.3 miles of 8- and 12-inch-diameter pipelines with 20-inch-diameter pipeline, and
 - Sabinsville Storage Station – Installation of piping and ancillary equipment at the existing station.

To facilitate Commission Staff's review of the Implementation Plan, Table 1 lists the current status of the conditions that have been and will be met by DTI during Project facility construction and operation.

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
1	Prior to using modification	DTI shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. DTI must: <ol style="list-style-type: none"> a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary); b. justify each modification relative to site-specific conditions; c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and d. receive approval in writing from the Director of the Office of Energy Projects (OEP) before using that modification. 	DTI will comply with this condition.	Complete	Yes
2	With Implementation Plan	The Director of OEP has delegated authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the project. This authority shall allow: <ol style="list-style-type: none"> a. the modification of conditions of this Order; and b. the design and implementation of any additional measures deemed necessary (including stop-work authority) to assure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from project construction and operation. 	DTI will comply with this condition.	Complete	No

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
3	Prior to construction	Prior to construction , DTI shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, Environmental Inspectors (EI), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.	DTI will comply with this condition. Affirmative statement provided in Appendix 1 .	Complete	No
4	As soon as they are available, and before the start of construction	The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets. As soon as they are available, and before the start of construction , DTI shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets. DTI's exercise of eminent domain authority granted under Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. DTI's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of their natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.	DTI will comply with this condition.	To Be Provided By Facility Prior to Construction	No

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
5	Before construction in or near that area	<p>DTI shall file with the Secretary detailed alignment maps and aerial photographs at a scale not smaller than 1:6,000 identifying all facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/aerial photographs. Each area must be approved in writing by the Director of OEP before construction in or near that area.</p> <p>This requirement does not apply to extra workspace allowed by our Upland Erosion Control, Revegetation, and Maintenance Plan (Plan) and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.</p> <p>Examples of alterations requiring approval include all facility location changes resulting from:</p> <ol style="list-style-type: none"> implementation of cultural resources mitigation measures; implementation of endangered, threatened, or special concern species mitigation measures; recommendations by state regulatory authorities; and agreements with individual landowners that affect other landowners or could affect sensitive environmental areas. 	<p>DTI will comply with this condition.</p> <p>Supporting documentation for the Myersville Minor Field Realignment included in Appendix 2.</p>	Facility Updates To Be Provided (as needed) Prior to Construction	Yes

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
6	Within 60 days of acceptance of Certificate and prior to construction	<p>Within 60 days of the acceptance of the Certificate and before construction begins, DTI shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP. DTI must file revisions to its plan as schedules change. The plan shall identify:</p> <ul style="list-style-type: none"> a. how DTI will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order; b. how DTI will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel; c. the number of EIs assigned, and how DTI will ensure that sufficient personnel are available to implement the environmental mitigation; d. company personnel, including EIs and contractors, who will receive copies of the appropriate material; e. the location and dates of the environmental compliance training and instructions DTI will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change); f. DTI personnel (if known) and specific portion of the company's organization having responsibility for compliance; g. the procedures (including use of contract penalties) DTI will follow if noncompliance occurs; and h. for each discrete facility, a Gantt or PERT chart (or 	<p>DTI will comply with this condition.</p> <p>Preliminary Schedule provided in Appendix 3.</p>	Complete	Yes

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
		similar project scheduling diagram), and dates for: (1) the completion of all required surveys and reports; (2) the environmental compliance training of onsite personnel; (3) the start of construction; and (4) the start and completion of restoration.			
7	On a monthly basis until all construction and restoration activities are complete	Beginning with the filing of its Implementation Plan, DTI shall file updated status reports with the Secretary on a monthly basis until all construction and restoration activities are complete . On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include a. an update on DTI's efforts to obtain the necessary federal authorizations; b. the construction status of the project, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally-sensitive areas; c. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies); d. a description of the corrective actions implemented in response to all instances of noncompliance, and their cost; e. the effectiveness of all corrective actions implemented; f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken	DTI will comply with this condition.	Ongoing	No

TABLE 1 Allegheny Storage Project Environmental Conditions Tracking Table					
Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
		to satisfy their concerns; and g. copies of any correspondence received by DTI from other federal, state, or local permitting agencies concerning instances of noncompliance, and DTI's response.			
8	Prior to construction	Prior to receiving written authorization from the Director of OEP to commence construction of any project facilities , DTI shall file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).	DTI will comply with this condition. Table 5 provides current status of federal authorizations.	To Be Provided (as needed) By Facility Prior to Construction	No
9	Prior to commencing service	DTI must receive written authorization from the Director of OEP before placing its project facilities into service . Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.	DTI will comply with this condition.	Pending Completion of Construction	Yes
10	Within 30 days of commencing services	Within 30 days of placing the authorized facilities in service , DTI shall file an affirmative statement with the Secretary, certified by a senior company official: a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or b. identifying which of the Certificate conditions DTI has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.	DTI will comply with this condition.	Pending Completion of Construction	No

TABLE 1
Allegheny Storage Project Environmental Conditions Tracking Table

Condition Number	FERC Filing Deadline	Certificate Condition	Implementation Plan (December 2012)	Condition Status	FERC Approval Required
11	Prior to construction	<p>DTI shall not begin construction of the Mullett Compressor Station, Mullett Suction/Discharge pipelines, and Mullett 1 M&R Station, and/or use of associated staging, storage, or temporary work areas and new or to-be-improved access roads until:</p> <p>a. DTI files with the Secretary the Ohio State Historic Preservation Office's comments on the survey report for the extra work space at the Mullett Compressor Station; and</p> <p>b. the FERC staff reviews and the Director of OEP approves the cultural resources report and notifies DTI in writing that construction may proceed.</p> <p>All materials filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "CONTAINS PRIVILEGED INFORMATION--DO NOT RELEASE."</p>	<p>DTI will comply with this condition.</p> <p>Ohio State Historic Preservation Office comments provided in Appendix 4.</p>	Complete	Yes
12	No later than 60 days after placing units in service	<p>DTI shall file noise surveys with the Secretary no later than 60 days after placing the Myersville and Mullett Compressor Stations in service. If the noise attributable to the operation of all of the equipment at the Myersville and Mullett Compressor Stations at full load exceeds a day-night level of 55 decibels on the A-weighted scale at the nearby noise-sensitive areas, DTI shall install additional noise controls to meet the level within 1 year of each station's in-service date. DTI shall confirm compliance with the above requirement by filing second noise surveys for each station with the Secretary no later than 60 days after it installs the additional noise controls.</p>	<p>DTI will comply with this condition.</p>	Pending Completion of Construction	No

CONDITION 1

DTI shall follow the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests) and as identified in the EA, unless modified by the Order. DTI must:

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);*
- b. justify each modification relative to site-specific conditions;*
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and*
- d. receive approval in writing from the Director of the Office of Energy Projects (OEP) before using that modification.*

Compliance Statement

DTI will follow the construction procedures and mitigation measures as described in its application and supplements (including responses to staff data requests), as identified in the EA, and as modified by the Order. DTI will request written approval from the Director of OEP, through filings with the FERC, for modifications to these procedures, measures or conditions. In the filings, DTI will provide justification for each modification relative to a site-specific condition, and a description of environmental impacts of each modification, including an explanation of how the modification provides an equal or greater level of environmental protection than the original measure. DTI will not implement any requested modification until it receives approval in writing from the Director of the OEP.

CONDITION 2

The Director of OEP has delegated authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the project. This authority shall allow:

- a. the modification of conditions of this Order; and*
- b. the design and implementation of any additional measures deemed necessary (including stop-work authority) to assure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from project construction and operation.*

Compliance Statement

DTI acknowledges that the Director of OEP has the authority to protect all environmental resources during construction and operation and will take the necessary steps to implement protection. DTI understands that the Director of OEP has the authority to modify conditions of the Order and may design and/or implement any additional measures necessary (including stop work authority) to confirm continued compliance with Order conditions as well as the avoidance or mitigation of adverse environmental impact resulting from Project construction and operation.

CONDITION 3

Prior to construction, DTI shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, Environmental Inspectors (EI), and contractor personnel will be informed of the EI's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.

Compliance Statement

An affirmative statement is included as **Appendix 1**. This statement affirms that all company personnel, EIs, and contractor personnel will be informed of the EI's authority and will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.

CONDITION 4

*The authorized facility locations shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction**, DTI shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.*

DTI's exercise of eminent domain authority granted under Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. DTI's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of their natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

Compliance Statement

DTI will file with the Secretary as soon as they are available and before the start of construction, any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances will be written and will reference locations designated on these alignment maps/sheets.

DTI has no plans to use eminent domain. However, if required, DTI's exercise of eminent domain authority granted under NGA section 7(h) in any condemnation proceedings related to the Order will be consistent with these authorized facilities and locations. DTI acknowledges its right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of our natural gas facilities to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

CONDITION 5

DTI shall file with the Secretary detailed alignment maps and aerial photographs at a scale not smaller than 1:6,000 identifying all facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/aerial photographs. Each area must be approved in writing by the Director of OEP before construction in or near that area.

This requirement does not apply to extra workspace allowed by our Upland Erosion Control, Revegetation, and Plan (Plan) and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;*
- b. implementation of endangered, threatened, or special concern species mitigation measures;*
- c. recommendations by state regulatory authorities; and*
- d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.*

Compliance Statement

DTI will file with the Secretary detailed alignment maps and aerial photographs at a scale not smaller than 1: 6,000 identifying all facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed that have not been previously identified in filings with the Secretary. Approval for each of these areas will be explicitly requested in writing. For each area, the request will include a description of the existing land use/cover type, documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas will be clearly identified on the maps/aerial photographs. For each area, DTI will seek written approval by the Director of OEP before construction in or near that area.

DTI acknowledges this requirement does not apply to extra workspace allowed by FERC's Plan and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands. DTI also acknowledges the following examples of alterations requiring approval include all facility location changes resulting from:

- implementation of cultural resources mitigation measures;
- implementation of endangered, threatened, or special concern species mitigation measures;
- recommendations by state regulatory authorities; and
- agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.

Myersville Minor Field Realignment

Pursuant to Condition 5 of Appendix B to the Order, DTI is requesting written approval from the Director of OEP for the Myersville Minor Field Realignment as described below.

The Myersville Suction/Discharge pipelines are entirely located within one landowner tract and still on same landowner. At the request of the landowner, the Original Route is being modified to place the pipelines along the edge of the property instead of bisecting the property (Myersville Minor Field Realignment). The landowner has agreed to the variation and has signed an easement for the pipelines (provided in **Appendix 2**). The Original Route and Myersville Minor Field Realignment are shown on Figures 1 and 2 in **Appendix 2**. Also included in **Appendix 2** are the alignment sheets showing the Myersville Minor Field Realignment and work space for the pipelines, as well as the survey reports for biological and cultural resources. The cultural resource report and landowner easement are provided under separate cover labeled "Privileged and Confidential."

From the Myersville Valve Site, the Myersville Minor Field Realignment will follow the Original Route south for approximately 500 feet, then turns north-northeast to follow the property line for approximately 1,800 feet before turning south-southeast and continuing along the property line for approximately 2,300 feet to the Myersville Compressor Station. The Myersville Minor Field Realignment will cross Streams MY6S and MY4S (Grindstone Run) upstream of the Original Route crossing, one new perennial stream (Stream MY13S), and one new emergent wetland (Wetland MY14W).

The alignment sheet in **Appendix 2** for the Myersville Minor Field Realignment also identifies the locations for additional temporary work space, including two areas where an additional 25 feet of temporary work space will be used for top soil segregation, seven work spaces for staging near streams or the wetland, and an additional laydown area adjacent to the valve site. The existing temporary access road for the Original Route will not be used.

Table 2 provides a comparison of the Original Route and the Myersville Minor Field Realignment. In summary, the Myersville Minor Field Realignment will be 0.23 mile longer than the Original Route, and will affect an additional 4.85 acres during construction and 3.01 acres during operation. Both routes would cross three streams and one emergent wetland.

TABLE 2 Comparison of the Original Route and Myersville Minor Field Realignment		
Environmental Feature	Original Route	Myersville Minor Field Realignment
Total Length (miles)	0.64	0.87
Construction right-of-way (acres)	6.47	9.41
Additional Temporary Work areas (acres):		
Topsoil segregation - 301 ft by 25 ft (acres)	0	0.17
Topsoil segregation - 1,106 ft by 25 ft (acres)	0	0.63
Dewatering - 70 ft by 25 ft (acres)	0	0.04
Six (6) Stream/Wetland work areas – 50 ft by 25 ft (acres)	0	0.18
Valve site laydown – 467 ft by 83 ft (acres)	0	0.89
Total Construction Work Area (acres)	6.47	11.32
Operational right-of-way (acres)	3.4	6.41
Stream Crossings: (number)		
Ephemeral	1	1
Intermittent	1	0
Perennial	1	2
Emergent Wetland Crossings (acres)	0.07	0.03
Land Use Affected during Construction: (acres)		
Open/Agricultural/Pasture	5.57	7.65
Forest	0.9	3.67
Forest Permanently Removed for Operation (acres)	0.67	2.64
Access Road (existing road to pipeline right-of-way)	0.49	0

Table 3 identifies each additional temporary work space for the Myersville Minor Field Realignment, its purpose, and land use.

TABLE 3 Description of Additional Temporary Work Space				
Station No.	Work Space Description	Approximate Dimensions	Acres	Land Use
0+00	Staging area for Valve Site construction	467 ft x 83 ft	0.89	Open
19+25	Staging area for Stream MY13S crossing	50 ft x 25 ft	0.03	Forest/Open
20+95	Staging area for Stream MY13S crossing	50 ft x 25 ft	0.03	Forest/Open
33+31	Staging area for Stream MY4S crossing	50 ft x 25 ft	0.03	Open
34+82	For dewatering structure for spring located within Wetland MY14W and include it within the Limits of Disturbance (LOD)	70 ft x 25 ft	0.04	Open
36+54	Staging area for Wetland MY14W crossing	50 ft x 25 ft	0.03	Open
42+83	Staging area for slopes and avoiding disturbance to Stream MY3AS	50 ft x 25 ft	0.03	Forest
44+50	Staging area for slopes and avoiding disturbance to Stream MY3AS	50 ft x 25 ft	0.03	Open

CONDITION 6

Within sixty days of the acceptance of this certificate and before construction begins, DTI shall file an Implementation Plan with the Secretary for review and written approval by the Director of OEP. DTI must file revisions to its plan as schedules change. The plan shall identify:

- a. *how DTI will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EA, and required by the Order;*
- b. *how DTI will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;*
- c. *the number of EIs assigned, and how DTI will ensure that sufficient personnel are available to implement the environmental mitigation;*
- d. *company personnel, including EIs and contractors, who will receive copies of the appropriate material;*
- e. *the location and dates of the environmental compliance training and instructions DTI will give to all personnel involved with construction and restoration (initial and refresher training as the project progresses and personnel change);*
- f. *DTI personnel (if known) and specific portion of the company's organization having responsibility for compliance;*
- g. *the procedures (including use of contract penalties) DTI will follow if noncompliance occurs; and*
- h. *for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:*
 - 1) *the completion of all required surveys and reports;*
 - 2) *the environmental compliance training of onsite personnel;*
 - 3) *the start of construction; and*
 - 4) *the start and completion of restoration.*

Compliance Statement

DTI is submitting this Implementation Plan with the Secretary for review and approval by the Director of OEP describing how DTI will implement the mitigation measures described in the Project application, the EA, the environmental conditions appended to the Order, and the applicable measures identified by other agencies with approval over the Project.

The following specifically addresses the eight conditions in Condition 6 (i.e., 6.a through 6.h) of Appendix B to the Order.

a. Implementation of Construction Procedures and Mitigation Measures

The construction procedures and mitigation measures described in the application, responses and supplements (including FERC data requests), EA, and Order for the Project will be implemented through this Implementation Plan, contractor construction documents, the alignment sheets, and other supporting Project documentation. These documents will be kept on-site during construction and restoration, and will be issued to all on-site DTI Project supervisory staff, contractor supervisory personnel, and the EIs. The Implementation Plan and all federal, state, and local permits, authorizations, and clearances for the Project will be distributed during the environmental training.

b. Contract Documentation

The implementation of the FERC requirements and mitigation measures required by the Order will be incorporated into the contractor construction contracts through the drawings, terms and conditions, and specifications included with the contracts. Specifically, the construction contracts will require that construction shall be done in accordance with the construction alignment sheets, maps, FERC Plan and FERC Wetland and Waterbody Construction and Mitigation Procedures (Procedures), Project Spill Prevention Countermeasure and Control Plan, and all local, state, and federal permit conditions. The contractors will be provided with these documents to be used as guidance for construction activity and a copy of all approved plans will be maintained on-site.

The limits of disturbance are depicted on the alignment sheets. The contractor also will be provided with a line list which will include any landowner special requests. The contractors will be required to comply with all environmental conditions and permit requirements and will be informed that the EIs will be on-site during construction to document compliance or non-compliance.

c. Environmental Inspectors

DTI will employ one full-time EI throughout construction of each of the proposed pipelines (i.e., Myersville and Mullett Suction/Discharge and Sabinsville Replacements). During construction of the Myersville and Mullett Compressor Stations and the Sabinsville Storage Station, an EI (possibly the same as for the pipelines) will be employed on a full-time basis for earthmoving activities and associated building construction. Once the earthmoving and building construction

activities are complete, the EI will be available on a part-time basis for the remaining construction activities at the proposed compressor stations, storage station, and M&R stations (e.g., EI will oversee maintenance of erosion control measures, conduct weekly inspections, and inspect erosion control measures within 24 hours of each 0.5 inch of rainfall).

The role of the EI will be to monitor compliance with the mitigation and construction procedures identified in the Project application, as well as those identified in the federal, state, and county permits, or other authorizing documents. The EI(s) will also be responsible for preparing the Monthly Status Reports, Environmental Compliance Form, and Environmental Training Log. If additional EIs are required for specific areas or situations, DTI will add them as necessary.

d. Environmental Document Distribution

A complete copy of the Implementation Plan, FERC Plan and Procedures, and other relevant Projects permits and approvals, will be maintained on-site in each construction office. The DTI construction supervisor, contractor supervisory personnel, EIs, and others responsible for compliance with the FERC Order and other permits and approvals will also have a copy of these documents.

e. Environmental Compliance Training

Prior to construction of each discrete facility, DTI will conduct a comprehensive environmental training for all construction supervisory employees and inspectors who will work on that facility. The FERC staff will be invited to attend. The initial training will be completed in an open forum for the exchange of information and questions and answers, and will address environmental requirements specific to each facility. The training will include a PowerPoint presentation of environmental requirements and will address the following topics:

- Purpose of the Environmental Training;
- Authority and Responsibility of the EI;
- Erosion and Sediment Controls;
- FERC Plan requirements;
- FERC Procedures requirements;
- Environmental Order Conditions; and
- Other Permit Requirements.

All employees will be trained on the environmental requirements and the authority and responsibility of the EIs. No personnel will be allowed to work on the Project sites without completing environmental training which will be documented by the

EI. As applicable, follow up refresher training will be provided throughout the construction phase to reiterate certain requirements, if warranted, to specific work crews to ensure that environmental requirements are met. For environmental mitigation measures that address post-construction operation and maintenance requirements, DTI's engineering and environmental staff will provide relevant instruction and documentation to DTI's operating personnel for use in on-going operations and maintenance activities. This information will include copies of relevant environmental permits that specifically address long-term conditions.

f. Project Construction Organization

DTI will assign key personnel to each Project facility. These key personnel will be responsible for responding and implementing procedures to correct any compliance issue identified by FERC. Personnel assigned to these positions will be provided prior to construction and will include the personnel listed on Table 4.

TABLE 4 FERC Compliance Contact List				
Name/Title	Office	Mobile	Fax	Email
TBD Project Supervisor	TBD	TBD	TBD	TBD
TBD Project Engineer/Manager	TBD	TBD	TBD	TBD
Spencer Adkins Manager of Projects	304-627-3501	304-641-0831	TBD	Spencer.B.Adkins@dom.com
Sheri Franz Environmental Manager	421-237-4835	412-228-8228	412-237-4836	Sheri.L.Franz@dom.com
TBD Environmental Compliance Consultant	TBD	TBD	TBD	TBD
TBD Environmental Inspector	TBD	TBD	TBD	TBD

g. Procedures for Non-Compliance

If an incident of non-compliance occurs, the EI will coordinate with DTI's construction supervisor and contractor to determine the appropriate resolution. Immediate corrective action will be taken and a time frame for resolution of the issue will be established. The actions taken will depend on the degree of the non-compliance issue. The EI has the authority to stop work if necessary and is empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document.

The EI will document the non-compliance issue, measures taken to resolve the issue (or the date the measure will be implemented), and the effectiveness of the measure and will include this information in the Monthly Status Report for the Project.

h. Project Schedule

A preliminary construction schedule for each of the major Project facilities is provided in **Appendix 3**. The preliminary schedule identifies the:

- completion of all required surveys and reports;
- mitigation training of on-site personnel;
- start of construction; and
- start and completion of restoration.

This schedule is subject to change depending on receipt of applicable permits, material delivery, timing of outages, and/or other factors. An updated Project schedule will be provided prior to initiating construction on each Project facility.

CONDITION 7

*Beginning with the filing of its Implementation Plan, DTI shall file updated status reports with the Secretary on a **monthly basis until all construction and restoration activities are complete**. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:*

- a. an update on DTI's efforts to obtain the necessary federal authorizations;*
- b. the construction status of the project, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally-sensitive areas;*
- c. a listing of all problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);*
- d. a description of the corrective actions implemented in response to all instances of noncompliance, and their cost;*
- e. the effectiveness of all corrective actions implemented;*
- f. a description of any landowner/resident complaints which may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and*
- g. copies of any correspondence received by DTI from other federal, state, or local permitting agencies concerning instances of noncompliance, and DTI's response.*

Compliance Statement

Once construction begins, DTI will file status reports with the Secretary on a monthly basis until construction and restoration activities have been completed. Upon request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. DTI and/or its EIs will prepare the monthly status report that will include:

- Updates on federal authorizations, if required;
- Work completed during the reporting period, and work planned for the following reporting period;
- A listing of problems encountered and each instance of noncompliance observed by the EI(s) during the reporting period (both for the conditions imposed by FERC and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);

- Description of corrective actions implemented in response to instances of non-compliance, and their cost;
- Effectiveness of corrective actions implemented;
- Description of landowner/resident complaints which may relate to compliance with the requirements of this Order, and the measures taken to satisfy their concerns; and
- Copies of correspondence received by DTI from other federal, state, or local permitting agencies concerning instances of non-compliance and DTI's responses.

CONDITION 8

Prior to receiving written authorization from the Director of OEP to commence construction of any project facilities, DTI shall file with the Secretary documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).

Compliance Statement

Table 5 provides an update of federal authorizations applicable to the Allegheny Storage Project.

TABLE 5 Status of Federal Authorizations for the Allegheny Storage Project			
Agency	Federal Act, Section or Program / Authorization or Consultation	Date Submitted or Reason Why No Submission is Required	Date Clearance Received / <u>Anticipated Date of Receipt</u>
Federal Energy Regulatory Commission	Natural Gas Act, Section 7(c) – Certificate of Public Convenience and Necessity	Application filed February 2012	Certificate issued December 20, 2012
U.S. Army Corps of Engineers	Section 404 – Clean Water Act Baltimore District (MD and PA facilities) Pittsburgh District (OH facilities)	Applications submitted February 2012 MD Facilities: Revised application (with Myersville Minor Field Realignment) submitted in February 2013	Baltimore District – PA Facilities: Authorized under PA State Programmatic General Permit 4 (PASPGP-4) Authorization received on September 11, 2012 MD Facilities: <u>Pending December 2013</u> Pittsburgh District – OH Facilities: Permit received September 11, 2012
U.S. Fish and Wildlife Service	Section 7 Consultation - Endangered Species Act & Migratory Bird Conservation Act Annapolis Field Office, MD Columbus Field Office, OH Elkins Field Office, WV State College Field Office, PA	Letters submitted at various times in 2011 and 2012	Informal consultation complete

TABLE 5
Status of Federal Authorizations for the Allegheny Storage Project

Agency	Federal Act, Section or Program / Authorization or Consultation	Date Submitted or Reason Why No Submission is Required	Date Clearance Received / <u>Anticipated Date of Receipt</u>
Tribal Historic Preservation Offices	Native American Consultation (Absentee Shawnee Tribe of Indians of Oklahoma, Delaware Nation, Delaware Tribe of Indians, Eastern Shawnee Tribe of Oklahoma, Seneca Nation of Indians, Seneca-Cayuga Tribe of Oklahoma, Shawnee Tribe, Tonawanda Band of Seneca Indians of New York)	Consultation letters sent in October 2011	Responses received from Seneca-Cayuga, Eastern Shawnee in 2011 and 2012
Maryland Historic Trust	Consultation under Section 106 of the National Historic Preservation Act	Initial consultation letters submitted in November 2011, and February 2012 (Addendum 1). Myersville Minor Field Realignment (Addendum 2) submitted on November 28, 2012.	Clearance letters in January and February 2012. Clearance received February 2013
Maryland Department of the Environment	Air Quality Permit to Construct/Permit to Operate	Application re-submitted December 21, 2012	<u>Pending</u> <u>December 2013</u>
Ohio Environmental Protection Agency	Air Permit to Install and Operate	Application submitted in February 2012	Permit received in March 2012
Ohio Historic Preservation Office	Consultation under Section 106 of the National Historic Preservation Act	Consultation letters in November 2011, January 2012 (Addendum 1) and April 2012 (Addendum 2)	Clearance letters received in March 2012 (baseline and Addendum 1 survey) and July 2012 (Addendum 2)
West Virginia Department of Environmental Protection	Existing Air Permit Modification	Application to be submitted in July 2013	<u>Pending</u> <u>May 2014</u>
West Virginia Division of Culture and History	Consultation under Section 106 of the National Historic Preservation Act	Consultation letter in May 2005	Clearance letter in June 2005
Pennsylvania Historical and Museum Commission, Bureau for Historic Preservation	Consultation under Section 106 of the National Historic Preservation Act	Consultation letter in November 2011	Clearance letter in January 2012

CONDITION 9

*DTI must receive written authorization from the Director of OEP **before placing its project facilities into service**. Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.*

Compliance Statement

DTI will request written authorization from the Director of OEP to commence service on each Project facility and will not proceed until authorization is received. DTI acknowledges that such authorization will only be granted following a determination that rehabilitation and restoration of the facility construction areas are proceeding satisfactorily.

CONDITION 10

Within 30 days of placing the authorized facilities in service, DTI shall file an affirmative statement with the Secretary, certified by a senior company official:

- a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities would be consistent with all applicable conditions; or*
- b. identifying which of the Certificate conditions DTI has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status report, and the reason for noncompliance.*

Compliance Statement

Within 30 days of placing the Project in service, DTI will file an affirmative statement with the Secretary, certified by a senior company official:

- that the facilities have been constructed/installed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
- identifying which of the certificate conditions DTI has complied with or will comply with. This statement shall also identify any areas affected by the Project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for non-compliance.

CONDITION 11

DTI shall not begin construction of the Mullett Compressor Station, Mullett Suction/Discharge pipelines, and Mullett 1 M&R Station, and/or use of associated staging, storage, or temporary work areas and new or to-be-improved access roads until:

- a. DTI files with the Secretary the Ohio State Historic Preservation Office's (SHPO) comments on the survey report for the extra work space at the Mullett Compressor Station; and*
- b. the FERC staff reviews and the Director of OEP approves the cultural resources report and notifies DTI in writing that construction may proceed.*

*All materials filed with the Commission containing location, character, and ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "**CONTAINS PRIVILEGED INFORMATION--DO NOT RELEASE.**"*

Compliance Statement

A copy of the Ohio SHPO July 25, 2012 comments on the survey report for the extra work space at the Mullett Compressor Station is included in Appendix 4.

DTI acknowledges that all materials filed with the Commission containing location, character, and ownership information about cultural resources will have the cover and any relevant pages therein clearly labeled in bold lettering: "CONTAINS PRIVILEGED INFORMATION - DO NOT RELEASE."

CONDITION 12

*DTI shall file noise surveys with the Secretary **no later than 60 days** after placing the Myersville and Mullett Compressor Stations in service. If the noise attributable to the operation of all of the equipment at the Myersville and Mullett Compressor Stations at full load exceeds a day-night level (L_{dn}) of 55 decibels on the A-weighted scale (dBA) at the nearby noise sensitive areas (NSA), DTI shall install additional noise controls to meet the level **within 1 year** of each station's in-service date. DTI shall confirm compliance with the above requirement by filing second noise surveys for each station with the Secretary **no later than 60 days** after it installs the additional noise controls.*

Compliance Statement

Noise survey reports will be filed with the Secretary no later than 60 days after placing the authorized units at the Myersville and Mullett Compressor Stations in service. If the noise attributable to the operation of the stations, including the additional units, at full load exceeds an L_{dn} of 55 dBA at any nearby NSAs, DTI will install additional noise controls to meet that level within one year of the in-service date. DTI will confirm compliance with the L_{dn} of 55 dBA requirement by filing a second noise survey with the Secretary no later than 60 days after it installs the additional noise controls.

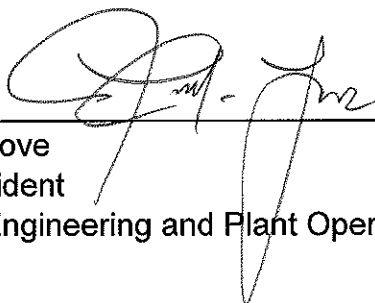
Appendix 1

Allegheny Storage Project Affirmative Statement

AFFIRMATIVE STATEMENT

Allegheny Storage Project
Docket No. CP12-72-000

Dominion Transmission, Inc. hereby affirms that all appropriate company personnel, environmental inspectors, and contract personnel will be informed of the environmental inspector's authority and will be trained on the implementation of environmental mitigation measures appropriate to their respective jobs, prior to becoming involved with construction and restoration activities.



John M. Love
Vice President
Pipeline Engineering and Plant Operations

2-8-2013

Date

Appendix 2

Allegheny Storage Project Myersville Minor Field Realignment Supporting Documentation

Figure 1 – USGS Map
Figure 2 – Aerial
Alignment Sheets
Addendum 2 - Wetland/Waterbody Delineation Survey Report
USFWS Documentation
MD SHPO Clearance
MD DNR – Request for Clearance

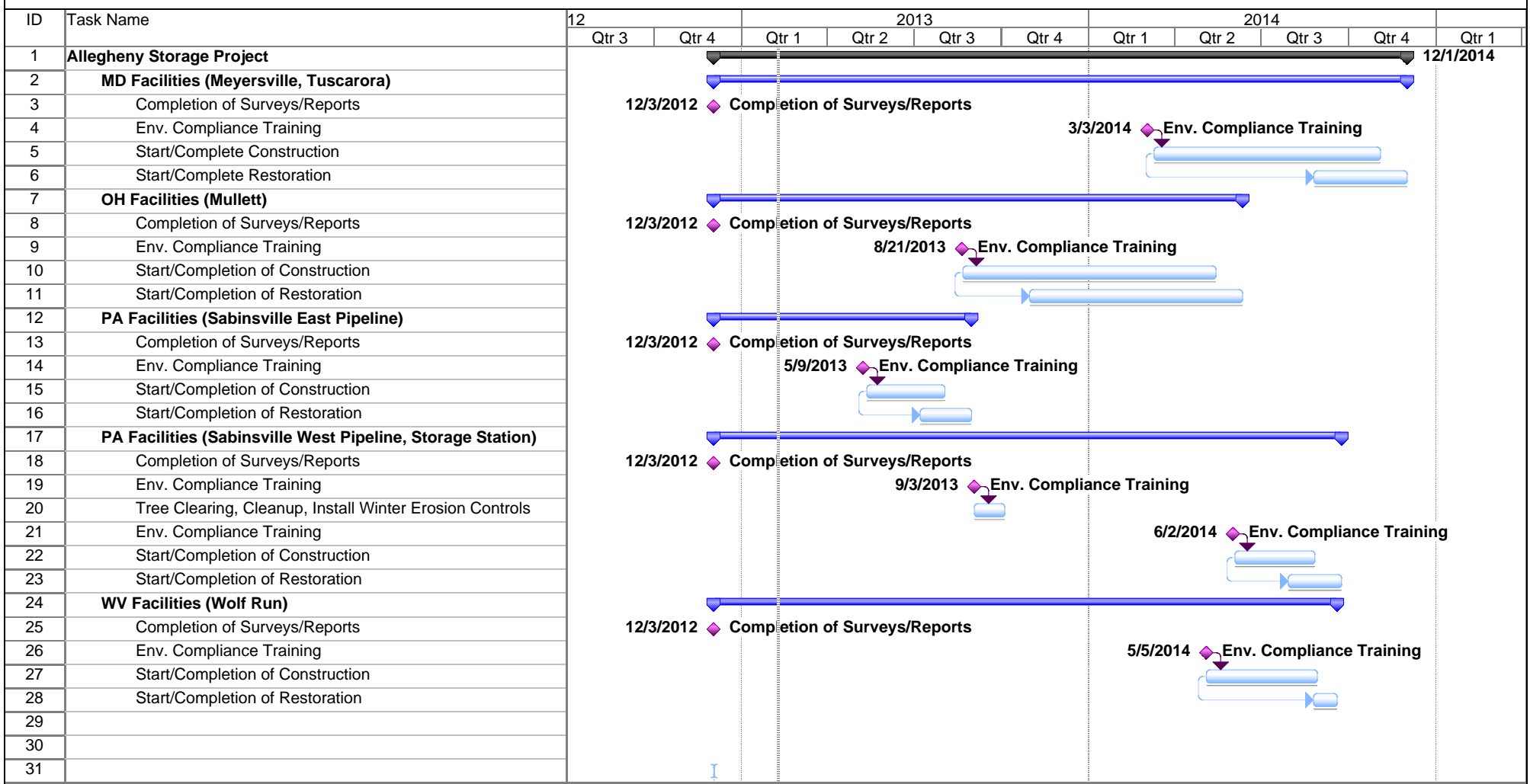
**THESE DOCUMENTS ARE DESIGNATED AS PRIVILEGED
INFORMATION AND ARE SUBMITTED SEPARATELY**

Addendum 2 - Cultural Survey Report
Landowner Easement, Myersville Minor Field Realignment

Appendix 3

Allegheny Storage Project Preliminary Construction/Restoration Schedule

ALLEGHENY STORAGE PROJECT Preliminary Facility Construction/Restoration Schedule



February 2013	Task		Summary		External Milestone	
	Split		Project Summary		Progress	
	Milestone		External Tasks		Deadline	

Appendix 4

Allegheny Storage Project Ohio State Historic Preservation Office Comments



July 25, 2012

Sheri L. Franz, Environmental Projects Advisor
Dominion Transmission, Inc.
1875 Grange Road
Charleroi, PA 15022

Re: Allegheny Storage Project
Switzerland Township, Monroe County, Ohio

Dear Ms. Franz,

This is in response to correspondence from your office dated April 26, 2012 (received April 30) providing additional information on this project. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The correspondence transmits documentation titled "Addendum 2 – Phase I Cultural Resource Survey of the Proposed Allegheny Storage Project, Additional Temporary Workspace (ATWS), Switzerland Township, Monroe County, Ohio" by Tracy L. Millis, April 2012. The project involves construction of a compressor station and a short section of connecting pipeline. The addendum information documents an intensive archaeological survey of the additional temporary workspace and slightly expanded area needed for the compressor station. No archaeological sites were identified during the additional survey. We concur with your finding that no additional archaeological investigations are necessary and the additional area does not add a potential for the project to affect historic properties. No further coordination with this office is necessary for this project unless there is a change in the scope of work. In addition, if new or additional properties are discovered, this office should be notified [36 CFR 800.13].

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "David Snyder".

David Snyder, Ph.D., Archaeology Reviews Manager
Resource Protection and Review

DMS:ds (OHPO Serial Number 2011-MOE-18256)

OHIO HISTORICAL SOCIETY

Ohio Historic Preservation Office

1982 Velma Avenue, Columbus, Ohio 43211-2497 ph: 614.298.2000 fx: 614.298.2037
www.ohiohistory.org

Document Content(s)

PUBLIC - Implementation Plan.PDF.....1-39