

Dominion Transmission, Inc.

701 East Cary Street, Richmond, VA 23219

December 7, 2011

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

Re: Dominion Transmission, Inc.

Allegheny Storage Project

PF11-9-000

Responses to Comments Received During FERC Scoping Process

Dear Secretary Bose:

On July 28, 2011, the Commission issued an Approval of the Pre-Filing Process Request for Dominion Transmission, Inc.'s (DTI) Allegheny Storage Project (Project) and the associated National Environmental Policy Act (NEPA) review process, as filed under the above referenced docket.

Pursuant to Section 157.21(f)(9) of the Commission's regulations, DTI hereby submits responses to comments raised during the scoping comment period.

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

Respectfully submitted,

Isl Amanda K, Prestage

Amanda K. Prestage Regulatory and Certificates Analyst III

cc: Jessica Harris, FERC



Dominion Transmission, Inc.

Allegheny Storage Project Docket No. PF11-9

Responses to Comments Received During FERC Scoping Process

October 24, 2011 through November 23, 2011

December 2011

Dominion Transmission, Inc. Allegheny Storage Project – Docket No. PF11-9 Responses to Comments Received During FERC Scoping Process

October 24, 2011 through November 23, 2011

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Dominion Transmission, Inc.

Allegheny Storage Project – Docket No. PF11-9

Responses to Comments Received During FERC Scoping Process

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LIST OF ACRONYMS

APE Area of Potential Effect

Bcf billion cubic feet

BG&E Baltimore Gas & Electric BMPs best management practices

CAA Clean Air Act

Certificate Certificate of Public Convenience and Necessity

CFR Code of Federal Regulations

CO carbon monoxide

COA 1989 Consent Order and Agreement

CWA Clean Water Act

DCNR Department of Conservation and Natural Resources

Dth/d dekatherms per day

DTI Dominion Transmission, Inc. EA Environmental Assessment

FERC or Commission Federal Energy Regulatory Commission

FERC's Plan Upland Erosion Control, Revegetation, and Maintenance Plan FERC's Procedures Waterbody and Wetland Construction and Mitigation Procedures

GHG greenhouse gas

HAPs Hazardous Air Pollutants

HEO Highway Employment Overlay

hp horsepower I-70 Interstate 70

ISO Organization for Standardization LDC Local Distribution Companies

LNG liquefied natural gas M&R metering and regulating

MDE Maryland Department of Environment

MECA Manufacturers of Emission Controls Association
MDNR Maryland Department of Natural Resources
NATA National-Scale Air Toxics Assessment

NOI Notice of Intent

NSAs nearest noise sensitive areas
OTR Ozone Transport Region

PADEP Pennsylvania Department of Environmental Protection

Project Allegheny Storage Project SIPs State Implementation Plans

SPCC Plan Spill Prevention, Control and Countermeasure Plan

tpy tons per year U.S. United States

USACE U.S. Army Corps of Engineers

USDA-NRCS U.S. Department of Agriculture – Natural Resource Conservation

Service

USDOT U.S. Department of Transportation

U.S. Environmental Protection Agency

USEPA
U.S. Environmental Protectio
USFWS
U.S. Fish & Wildlife Service
USGS
U.S. Geological Survey
VOCs
volatile organic compounds
WGL
Washington Gas Light

1.0 INTRODUCTION

This document provides responses to comments on the Dominion Transmission, Inc. (DTI) Allegheny Storage Project (Project) received in response to the Federal Energy Regulatory Commission's (FERC or Commission) *Notice of Intent to Prepare an Environmental Assessment for the Planned Allegheny Storage Project), Request for Comments on Environmental Issues, and Notice of Public Scoping Meeting* dated October 24, 2011 (NOI). The scoping period for the NOI ended on November 23, 2011, and included two public scoping meetings: November 7, 2011 at Myersville, Maryland; and November 8, 2011 at Powhatan Point, Ohio.

A total of 664 letters were received, including 558 form letters, within the official NOI comment period (i.e., October 24, 2011 through November 23, 2011). All comment letters, with the exception of four, were in response to the proposed Frederick County, Maryland facilities. In addition, 54 people commented on the Project during the public scoping meeting at Myersville, Maryland. One person commented at the Powhatan Point, Ohio meeting. No comments were received on the West Virginia facilities.

Since many comments reflected similar concerns, individual comments have been grouped into general categories (Air, Noise, etc.) and summarized, and then responded to. Table 1 in Appendix A lists each commenter for the Maryland facilities; Table 2 in Appendix A lists each commenter for the Ohio and Pennsylvania facilities. These tables provide a unique identification number for each commenter and that identification number is included with the comment summary.

Sections 2.0 through 16.0 of this document respond to comments regarding the Maryland facilities. Section 17.0 responds to comments regarding the Ohio and Pennsylvania facilities and Section 18.0 provides references.

Maryland Facilities

Mr. Roscoe G. Bartlett, Member of Congress, United States (U.S.) House of Representatives, provided comments on behalf of his constituents in Frederick County, Maryland. Since this letter summarizes the major concerns, responses to these concerns are provided below.

COMMENT 1: "Does the identified 22-acre parcel for the site near Myersville meet required buffer areas for a compressor station? The property is zoned Commercial with a Highway Employment Overlay, not Industrial. There is no highway-related function for the proposed compressor station. Is approval for a zoning change by local officials required by the FERC to meet the standard of public convenience and necessity?"

Response: The site proposed at Myersville provides sufficient buffer space for the compressor station in terms of public safety, noise mitigation, and visual impact. By placing permanent facilities in the middle of the parcel, DTI anticipates developing the property in such a way as to preserve the majority of the existing natural vegetation as

well as the surrounding landscapes and views, thus minimizing any impacts to the local community and nearby residents.

DTI's understanding of the Town of Myersville overlay zoning districts, as explained by local officials, is that these zoning districts may be superimposed on other zoning districts to permit uses otherwise disallowed in a particular district or to impose supplemental restrictions on uses in the district. The Highway Employment Overlay (HEO) district may only be superimposed in the General Commercial zoning district. Therefore, the use is allowed, but must meet requirements and special conditions consistent with the Town of Myersville Comprehensive Plan and HEO district criteria.

The FERC encourages cooperation with local authorities and it is DTI's intent to fully comply with all the requirements of the Town of Myersville and Frederick County as necessary to receive local permits and construction authorization for the planned facility.

COMMENT 2: "The 22-acres parcel is surrounded by other properties, including Hemp's Farm in Jefferson, a 100-year old family farm and the LUCY school, a certified green school. Will the acquisition of additional acreage be necessary to meet required buffer areas? Would the FERC approve the proposal as meeting the standard of public convenience and necessity if the acquisition of additional acreage involves the assertion of Eminent Domain?"

Response: No additional acquisition of land is necessary or anticipated for construction of the proposed compressor station. To date, DTI has engaged landowners that are directly affected by the various project facilities and currently has a purchase option in place with the landowner of the land parcel where the compressor station is proposed.

COMMENT 3: "There are four schools within one mile of the proposed site, including two day care centers, raising significant safety and noise concerns. Existing housing developments are less than a half mile from the site. More than 1,800 people in residences and businesses, including dozens of working farms are within four miles of the site."

COMMENT 4: "The proposed site in Myersville is near I-70, a major highway and two major roadways, Rt. 340 and Rt. 180. I-70 carries 65,000 motorists each day."

Response to Comments 3 and 4: It is not uncommon for natural gas transmission facilities, including compressor stations, to be located in close proximity to public areas, buildings and residences. DTI must design and operate all facilities in full accordance with strict U.S. Department of Transportation (USDOT) standards to ensure the safety of the public. The USDOT Minimum Federal Safety Standards stated in Code of Federal Regulations (CFR) Title 49, Part 192 also define area classifications, based on population density in the vicinity of pipeline transmission facilities, which determine more rigorous safety requirements for populated areas.

Adequately and responsibly maintaining natural gas compressor stations and pipelines is the key to providing a safe and reliable energy source. DTI regularly patrols, inspects, tests, repairs, replaces, and maintains its pipelines and compressor stations. DTI demonstrates its commitment to safety by meeting or exceeding federal and state requirements for safe pipeline operations.

COMMENT 5: "Will preservation of the viewscape around the proposed site for the Myersville Compressor station be required under the standard of public convenience and necessity? On and adjoining or visible from the proposed Myersville site are significant historic sites and four state parks. Gambrill State Park, Greenbriar State Park, South Mountain State Park, Washington Monument State Park and the Appalachian Trail which winds through Gathland State Park. Gathland State Park http://www.dnr.state.md.us/publiclands/wester/gathland.html also has important portions of the site of the first Civil War battle in Maryland, the Battle of South Mountain http://www.dnr.state.md.us/publiclands/southmtbattle.html. The battle which began on September 14, 1862, involved two future Presidents Rutherford B. Hayes and William McKinley, and led directly to the Battle of Antietam. Nearly \$4 million has been spent to protect approximately 1,313 acres of the historic battlefield at South Mountain – the program Open Space. Much of this acreage has been preserved through easements."

Response: The state parks identified to be in the general vicinity of the compressor station area include Washington Monument State Park, approximately 4.5 miles to the west, Greenbrier State Park, approximately 7 miles to the northwest, South Mountain State Park, approximately 8 miles to the northwest, Gambrill State Park, approximately 7.5 miles to the southeast and Gathland State Park which is located approximately 12 miles southwest of the station area. The nearest point of the Appalachian Trail is approximately 4.5 miles to the west. The proposed compressor station facilities would not be visible at these distances.

DTI proposes to retain the majority of the natural vegetative barrier on the 21-acre Myersville site location and add additional vegetative screening where necessary when developing the compressor station to help conceal the station facilities from public view at locations which are directly adjacent to the site. An independent consultant performed an extensive visual modeling analysis to illustrate the minimal visual impact anticipated at various nearby public view-points surrounding the location. DTI plans to have the analysis updated by the consultant during the winter of 2012 to include new photography and further modeling to simulate the effects of winter foliage drop. This is a necessary step to identify barrier areas on the property where natural vegetative screening may not be adequate enough during winter conditions to be effective and to plan for additional evergreen screening to be installed to minimize the visual impact from public viewpoints.

COMMENT 6: "The proposed site of the compressor station is an area whose topography and geography naturally traps and concentrates air pollutants. Will calculations be required to determine anticipated levels of additional emissions when the compressor is in operation? Is compliance with regulations limiting pollutants under the Clean Air Act and other relevant laws required to meet the standard of public convenience and necessity?"

Response: The emissions of air pollutants from the proposed facility are minimized by the combustion technology and emission control systems that will be incorporated into the facility design. Air pollutants will be released in the hot exhaust gases vented from stacks at elevated temperatures, which aids in the dispersion of stack emissions.

DTI will conduct dispersion modeling, which estimates the impact of the new facility on the region's air quality. The facility must be in compliance with federal and state air quality standards for all criteria pollutants. The results will be filed with DTI's application.

Emissions from the proposed station result solely from the combustion of natural gas in a turbine, heater and emergency generator. These types of emissions are the same for any natural gas combustion source, such as a home furnace or any commercial building natural gas boiler. The proposed station is not a manufacturing or processing plant and would be considered a minor source of air pollution per the U.S. Environmental Protection Agency (USEPA) and Maryland Department of Environment (MDE). Also, it is important to note that the estimated emissions are worst case; assuming the units will operate at their maximum permitted capacity. The plant will always operate at less than these projected maximum emission rates to remain in compliance. The Environmental Report, Exhibit F-I, Resource Report 9, includes a complete summarization of the potential air quality impact for the proposed Project.

The facility will be equipped with a catalyst to control hazardous air pollutants, including carcinogens such as benzene or formaldehyde. As a result, there will be a lower emission rate per unit of combustion than typical gas-burning facilities, such as furnaces and boilers. Under standards developed by the USEPA and the State of Maryland that are developed to protect the public, the facility will be classified as a minor source of hazardous air pollutants.

COMMENT 7: "A fault that runs along the South Mountain Ridge and a history of sinkholes in Frederick County raise questions about the stability of the geologic area to safely support installation and operation of the proposed compressor station."

Response: DTI must consider the applicable geologic seismic zones established by the U.S. Geological Survey (USGS) at all locations where pipeline and compressor facilities are constructed. The proposed station site is located in a USGS seismic zone 1, which is the second lowest of the six seismic zone risk categories. According to the Maryland Geological Survey, there are numerous faults in the state but none are known or even suspected to be active. DTI has no geological data that suggests a fault line located 1 to 2 miles from the proposed compressor station would significantly increase the risk of a facility failure.

COMMENT 8: "Will FERC require measures to protect the safety and integrity of groundwater supplies as well as nearby waterways including Grindstone Run, a tributary of Catoctin Creek in the Chesapeake Bay watershed?"

Response: During construction, DTI will comply with the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) and *Waterbody and Wetland Construction and Mitigation Procedures* (Procedures) and the MDE's Construction Storm Water Permit requirements to prevent construction-related spills and materials from reaching the ground, and, ultimately, the groundwater. The requirements address secondary containment of any chemical storage and prohibit construction vehicle fueling within 100 feet of a water body or wetland.

After construction is complete and before the facility becomes operational, DTI will implement a site-specific Spill Prevention, Control and Countermeasure Plan (SPCC Plan), designed to comply with USEPA requirements under the Clean Water Act (CWA), and to prevent stored or used petroleum products from being released or spilled, and reaching surface or groundwater. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). Other than those items already mentioned,, the primary chemicals used at the station will consist of lubricating oil and coolants. All waste materials will be transported to a licensed disposal facility for proper handling.

COMMENT 9: "Will the FERC require sound cancellation or other technologies when the 16,000 hp compressor turbines are operating to maintain the existing low-decibel ambience of the area to meet the standard of public convenience and necessity?

Response: The preliminary noise analysis report indicates that the noise impact from the proposed compressor station would be minimal. The facility will incorporate state-of-the-art noise mitigation equipment into the design in an effort to maintain a net-zero increase in the overall sound levels at all public noise sensitive areas, including residences.

An independent noise consultant completed a final ambient noise study that confirms that with noise mitigation measures built into the design, <u>nearby residences will not experience any increase in current noise levels.</u> FERC will further require DTI to incorporate the noise mitigation measures recommended for this Project and a post-construction noise analysis will be conducted to verify that all noise requirements are successfully achieved.

COMMENT 10: "Will the FERC require an analysis of other potential alternative sites to satisfy the affected residents in Frederick County that the economic costs and environmental disruption from construction and operation of a new compressor station along the pipeline will be minimized under the standard of meeting public convenience and necessity? If other

alternative sites are considered, will the FERC inform the public why the Myersville site is considered the optimum location under the public convenience and necessity standard?

Response: In an effort to maximize the area of DTI's pipeline that would be suitable for locating this compressor station, DTI completed a hydraulic study of the pipeline's capabilities. The results of this study identified this maximum area to be a 12-mile corridor along the pipeline. DTI completed an extensive search for potential sites within this 12-mile corridor. There are no properties available within this corridor currently zoned for industrial use. The only property identified within the hydraulic study corridor that is zoned for industrial use is the Albans tractor facility, located on the opposite side of Milt Summers Road and directly adjacent to the proposed compressor station site.

DTI believes the 21-acre Myersville site, and the design of the compressor station facilities as proposed, will minimize any impact to the community. It is alongside the interstate, next to a water treatment facility, and across the road from the only other industrial site in the region. A site that is feasible in terms of natural gas hydraulics, constructability, and reasonable access to the pipeline is needed. This site fits those requirements. During the 2008 scoping process for a similar project, Maryland residents suggested the company select an industrialized location with enough acreage to minimize the visual impact of the station. The project was suspended in mid-2008, not because of public opposition, but due to technical aspects and complexities with the proposed gas storage facilities.

When DTI started planning the current Allegheny Storage Project and a compressor station in Frederick County, the previous project's public comments were taken into account. DTI searched extensively for industrialized sites within the acceptable limits of a 12-mile hydraulic study corridor. No sites currently zoned for industrial use could be located within the study corridor limits. However, the 21-acre Myersville site and the design of the compressor station would provide a more industrialized setting and a natural vegetative barrier to minimize visual impacts.

Comment 11: "How will FERC assess the safety record of the applicant which had an incident on January 24, 2011 in Fairport, Ohio that caused a fire in which seven homes were destroyed? The applicant has also been cited at least four violations by the Department Transportation and Pennsylvania Department Environmental Protection."

Response: The unfortunate incident which occurred January 24, 2011 in Fairport Harbor, Ohio on a Dominion East Ohio local distribution pipeline system resulted when pipeline fluids and a drop in gas temperature across small gas regulators caused the regulators to malfunction. The malfunction resulted in the over-pressure of some downstream residential distribution piping and appliances. Dominion East Ohio personnel worked diligently with the USDOT's Pipeline and Hazardous Materials Safety Administration as necessary to take the appropriate measures required to eliminate the potential for a recurrence of this type of piping system failure.

The proposed compressor station in Myersville, Maryland would serve as a mainline transmission pipeline facility and would not involve local distribution of natural gas to public residences. Nevertheless, public safety is a top priority for DTI and with the FERC. While the FERC has oversight in ensuring that pipelines and aboveground facilities are safely constructed and installed, once the natural gas is flowing in the proposed facilities, the USDOT assumes oversight responsibility during the operational life of the facilities. DTI must design, construct, operate and maintain facilities in accordance with standards designed to protect the public and prevent problems that might lead to failures. The facility would include key safety features and devices required by the USDOT. Resource Report 11 addresses in detail the potential public hazards and the procedures and design features that will protect the public in the case of potential accidents or other emergency situations.

In 2009, DTI was cited by the USDOT for violations of record keeping and inspection requirements. The USDOT later withdrew portions of the violations after receiving clarifying information from DTI. DTI maintained that some of the remaining violations occurred because DTI had interpreted USDOT regulations in a manner consistent with certain regulatory guidelines. However, the USDOT ultimately rejected DTI's interpretation. DTI has since addressed all of the violations and has fully complied with the terms of the USDOT's compliance order. DTI shares USDOT's commitment to pipeline safety and has cooperated with them throughout this matter.

2.0 PROJECT NEED AND FUTURE PLANS

COMMENT SUMMARY 2-1: The need for the Project has not been clearly demonstrated. (C65, C118, C128, C163, C65, MSM1, MSM3, MSM16)

Response: DTI has executed precedent agreements (e.g., contracts) with three customers for 125,000 dekatherms per day (Dth/d) of storage service (with a capacity of 7.5 billion cubic feet [Bcf]) and 125,000 Dth/d of firm natural gas transportation services in Ohio, West Virginia, Pennsylvania, and Maryland. The three customers are Local Distribution Companies (LDC), which provide natural gas on a regional and local basis to local residences, businesses, industries, and power plants. Storage capacity to meet this incremental transportation service will be supplied by DTI's existing storage facilities at Sabinsville Storage Pool and the Fink Kennedy/Lost Creek Storage Complex.

Washington Gas Light Company (WGL) is one of the customers in the mid-Atlantic area and has contracted for 100,000 Dth/d to be delivered at the Leesburg and Loudoun, Virginia metering and regulating (M&R) interconnect. WGL distributes natural gas to customers in the District of Columbia, Maryland, and Virginia. The other mid-Atlantic customer is Baltimore Gas & Electric (BG&E), which has contracted for 15,000 Dth/d to be delivered at the Tuscarora, Maryland M&R interconnect. The third customer is TW Phillips, which has contracted for up to 10,000 Dth/d to be delivered at the Butler, PA interconnect.

A portion of the Allegheny Storage Project, including the compressor station in Frederick County, Maryland, has been designed to provide transportation of an additional 115,000 Dth/d of natural gas for service to WGL and BG&E.

COMMENT SUMMARY 2-2: Identify who the customers are in Frederick County. (C183, MSM4)

Response: One of the customers for this Project is WGL. DTI currently provides service to WGL at the Jefferson M&R which is located in Frederick County. Although this Project is designed to provide service on a primary basis to other points on its system, DTI would be required to provide secondary and interruptible services to all other interconnections on its system including the Jefferson interconnect. Additionally, this Project is designed to provide additional service to BG&E at the Tuscarora interconnect, which is also located in Frederick County.

COMMENT SUMMARY 2-3: The natural gas will not serve or benefit the community of Myersville as the natural gas will go to people outside of Myersville and Frederick County. (C25, C42, C43, C176, MSM2, MSM3, MSM9, MSM36)

Response: See the response to Comment Summary 2-2. The Commission will determine whether to issue a Certificate of Public Convenience and Necessity (Certificate) for the Project. This determination is based on the overall public need for the Project.

COMMENT SUMMARY 2-4: Natural gas provided by the project will be shipped overseas. (C31, C62, C650, C118, C165, C166, C167, MSM8, MSM9, MSM10, MSM11, MSM12, MSM17, MSM21, MSM23, MSM25, MSM27)

Response: In order for the natural gas provided by the Project to be shipped overseas, a liquefaction facility would be required to liquefy (or convert) the natural gas to LNG. Dominion Cove Point LNG does not have liquefaction facilities for exporting. Therefore, it is not possible for natural gas from the Project to be exported overseas. Also, see response to Comment Summary 2-5.

The need for this compressor station, and the other Project facilities, stems from a 2007 agreement related to natural gas storage and firm transportation services. It is not associated, in any way, with Dominion's Cove Point LNG Terminal or potential export from the terminal.

COMMENT SUMMARY 2-5: DTI has indicated that it might expand the compressor station at Myersville. Is the proposed compressor station designed to meet current demand or is excess capacity built into the design? What new equipment might reasonably be added to the station to provide extra capacity? Will the pipeline be capable of handling increased flow? (C56, C59, C118, C176, C180, C182, C195, MSM1, MSM20, MSM25, MSM27, MSM28, MSM29)

Response: The station has been designed to only meet current contractual demand. There has been no excess capacity built into the design. If demand should require expansion of the facility at a future date, equipment would be sized to accommodate that incremental demand and DTI would be required to go through the FERC permitting process for facility expansion, including public comment. The existing pipeline is in excellent condition and has been designed, tested and properly maintained to withstand the pressures associated with the proposed Myersville Compressor Station.

COMMENT SUMMARY 2-6: Why is a compressor station required in Frederick County and why must the station be 16,000 hp? (C1286, C167, C183, C193, C195)

Response: DTI completed a hydraulic study of the pipeline's capabilities to transport the additional natural gas volumes to supply its customers. The results of this study identified a maximum area to be a 12-mile corridor along the pipeline in Frederick County in which to locate the compressor station. Hydraulic studies also identified the need for up to 16,000 horsepower (hp) of compression to meet the increased requirements on the pipeline.

COMMENT SUMMARY 2-7: Would FERC approve the Project if eminent domain were required? (S2)

Response: If this Project is approved, the FERC Certificate authorizes use of eminent domain.

COMMENT SUMMARY 2-8: If FERC approves this Project, will this set a precedent for other utilities to request authorization to build compressor stations along pipelines around the country. (S2)

Response: Under Section 7 of the Natural Gas Act, FERC is responsible for the review of applications for the construction and operation of interstate natural gas pipelines and storage facilities. The FERC does not regulate LDCs, the local natural gas distribution companies that provide natural gas to homes and businesses. Since each project regulated by the FERC must demonstrate need for the project, it is unlikely that approval of the Allegheny Storage Project, in and of itself, would result in other utilities requesting authorization to build compressor stations unless there is a demonstrated need for those stations.

COMMENT SUMMARY 2-9: Resource Report 1, Page 1-2, states that the "Marcellus shale gas play has an estimated technically recoverable resource base of about 400 trillion cubic feet." The only way that reserves can be accurately determined is after the wells have been drilled and produced, and a production history and decline curve has been established. (C60)

Response: This statement came from the U.S. Energy Information Administration, which compiles statistics on energy for the U.S. While it was included in the first draft Resource Report 1, it was deleted from the subsequent draft.

3.0 PROJECT FACILITIES

COMMENT SUMMARY 3-1: DTI should explain the withdrawal of its 2008 pre-application in Middletown. (C183, MSM4)

Response: DTI suspended its proposed Storage Factory Project, which included the Middletown Compressor Station, in 2008 due to technical aspects and complexities with the new gas storage facilities associated with that project.

COMMENT SUMMARY 3-2: How will DTI operate the proposed Myersville Compressor Station and will a rich or lean mix be utilized? Will the compressors be powered by natural gas or electric motors? (C120, 195, G1)

Response: DTI will operate the Myersville Compressor Station as an integrated facility on its PL-1 pipeline system. The compressors will be run on natural gas from the pipeline system.

COMMENT SUMMARY 3-3: What is the size of the facility, specifically the size of the building and compressor capacity? (C56, C183, MSM15)

Response: The operational footprint for the compressor station will be approximately 7.7 acres of which 3.8 acres will be fenced for the station buildings and facilities. The fenced in area will include three primary structures: a compressor building (approximately 65 feet by 75 feet), an office/auxiliary building (approximately 40 feet by 100 feet), and a small storage building (approximately 32 feet by 32 feet). The compressor will consist of one Solar Mars 100, natural gas fired turbine with a manufacturer's International Organization for Standardization (ISO) rating of 16,000 hp.

COMMENT SUMMARY 3-4: Describe the locations of each storage facility, how much natural gas is being stored, and how much gas will be stored between the Chambersburg and Leesburg compressor stations in Pennsylvania and Virginia? (C183)

Response: DTI operates one of the largest underground natural gas storage systems in the U.S. with links to other major pipelines and to markets in the Midwest, Mid-Atlantic and Northeast regions of the U.S. DTI maintain 7,800 miles of pipeline and dozens of compressor stations in six states – Ohio, West Virginia, Pennsylvania, New York, Maryland and Virginia. The 7.5 Bcf of storage capacity for this Project comes from the following: 5 Bcf from Dominion East Ohio, 2 Bcf from DTI's existing Fink Kennedy/Lost Creek storage complex in WV, and 0.5 Bcf from DTI's existing

Sabinsville storage pool in PA. DTI does not operate any storage facilities between the Chambersburg, Pennsylvania and Leesburg, Virginia compressor stations.

COMMENT SUMMARY 3-5: Explain how growth of the proposed Myersville Compressor Station facility will be controlled and DTI's proposal to limit operations to two weeks per year will be enforced. (C56, C185, MSM27)

Response: DTI has not stated that station operations would be limited to two weeks per year. The compressor station is planned as a peaking facility that would be used primarily in the coldest or warmest periods of the year. DTI estimates that the facility could operate from 3 to 4 months per year, most likely in January and February or July and August when the demand for regional natural gas usage has historically been at peak levels. DTI may be required to operate the compression equipment continuously during these peak gas delivery periods, depending on the specific weather conditions, the regional demand for natural gas supply, and DTI's ability to provide gas deliveries to its customers.

DTI is planning to apply for an air permit to operate the station for 6,000 hours per year and that is the basis for all modeling and the maximum hours of operation. DTI has no current plans to expand the footprint of the proposed compressor station or add additional turbines. If expansion is required in the future due to additional customer demand, DTI would be required to obtain new authorization from the FERC, as well as all applicable federal and state permits and clearances before proceeding with that expansion.

COMMENT SUMMARY 3-6: What is a valve site? Does it create noise and/or emissions? (C65)

Response: A valve site typically consists of a graveled area surrounded by a chain link fence and located within the confines of, or just adjacent to, the permanent right-of-way. A valve site may vary in size depending on the number of valves and supporting equipment required and the function of the valves. Aboveground elements include the piping that extends aboveground from the buried pipeline and the valve. Valves work like gateways and can be open to allow natural gas to flow freely or shut to stop flow along a section of the pipeline. A road from the nearest public roadway to the valve site is required for maintenance during operations. There is no noise or air emissions associated with the valve site.

COMMENT SUMMARY 3-7: Will the compressor station also have natural gas storage on site? (G1)

Response: Other than linepack, no natural gas will be stored on site.

COMMENT SUMMARY 3-8: What site security is being planned for the facility? (G1)

Response: The compressor station facility will be secured with a perimeter chain link fence with locking gates to restrict access, a security alarm system and surveillance cameras to monitor the fence perimeter and detect any intrusion. In addition, the station will be equipped with the following:

- Three modes of communication for remote operation (wide area network, satellite, and telephone). The manned control center is able to start and stop the station remotely as needed.
- Control systems to ensure proper operation that are designed to detect an upset condition (i.e., vibration, gas, fire, or heat) and implement safe shutdown of the pipeline system.
- The turbine and compressor building are equipped with gas, fire, and heat detection monitoring systems.
- A natural gas-fired backup power generator that provides for continued operation of the station during any commercial power outages.
- Mainline valves with hydraulic operators which can be remotely controlled.

When not in operation, the station will be fenced and gated and will be monitored remotely. When the facility is operating, on-site personnel will monitor conditions and have communication capabilities to notify local, regional, and corporate personnel if problems arise. In summary, the proposed DTI Myersville facility will incorporate current industry practices and provisions to reduce the risk of incidents and maximize the safety and reliability of the facilities. The facility will also meet or exceed all mandated USDOT and Occupational Safety and Health Administration requirements and stringent industry standards.

COMMENT SUMMARY 3-9: Are contract personnel required to have special state or federal certification to construct or modify gas transmission lines and compressor stations? (C180)

Response: Pipeline construction workers include job classifications such as construction manager, foreman, assistant foreman, lead hand, welder, pipeliner (entry level), crane operator, heavy equipment operator, heavy duty mechanic, swamper (entry level), small/specialty engine mechanic, truck driver. Each is trained and qualified according to the type of work being performed or equipment being operated. For example, as part of the quality assurance process, each welder must pass qualification tests to work on a particular pipeline job, and each weld procedure must be approved for use on that job in accordance with federally adopted welding standards. Welder qualification takes place before the project begins. Each welder must complete several qualification test welds using the same type of pipe as that to be used in the project. These test welds are then destructively tested to certify the welder is qualified to work on a project.

COMMENT SUMMARY 3-10: Where are "bent" pipes placed and how will they be monitored during hydrostatic testing? (C180)

Response: Pipes are bent where necessary to allow the pipeline to fit uniformly within the varying contours of the bottom of the trench. Workers use a track-mounted, hydraulic pipe-bending machine to shape the pipe to the contours of the terrain. The bending machine uses a series of clamps and hydraulic pressure to make a very smooth, controlled bend in the pipe. All bending must be performed in strict accordance with federally prescribed standards to ensure the integrity of the bend and no special monitoring of bends during hydrostatic testing is required.

COMMENT SUMMARY 3-11: What is the expected useful life of the proposed compressor station and does the age of the older PL-1 pipe factor into the life expectancy? DTI should provide a list of all their compressor stations, and original and current hp. (C180, C183)

Response: With appropriate design, testing, maintenance, the life of a compressor station can be extended indefinitely. DTI's pipeline system in Frederick County is internally inspected regularly, as required by the USDOT, and is known to be in excellent condition. Like the compressor station, the life of the pipeline can be extended indefinitely with proper operation and maintenance.

DTI operates dozens of compressor stations throughout its pipeline system that have been modified over the years to accommodate increased demand. Because the location and history of expansion at these stations was based on overall pipeline system design to accommodate transportation service in response to specific demand, the original and current hp of these compressor stations has no relevance to the proposed compressor station at Myersville.

COMMENT SUMMARY 3-11: Provide a drawing to show the permanent access roads to the proposed Myersville Compressor Station and valve site. Figure 4-1a, provided in Resource Report 1, is unclear on the location of the compressor station access road and its proximity to Interstate 70 (I-70). (C180)

Response: Figure 4-1a clearly identifies the location of the access road to the valve site. DTI will revise Figure 4-1a to better illustrate the location of the access road to the compressor station. The compressor station access road will be approximately 150 feet from the Route 17 southbound exit ramp and approximately 450 feet from southbound lane of I-70. It will be located along an existing farm lane already on site.

4.0 ALTERNATIVES

COMMENT SUMMARY 4-1: The proposed Myersville compressor station site is not appropriate and should be relocated to an area of low population density far removed from residences, farms, schools or major roadways. (C1, C4, C15, C23, C25, C31, C33, C34, C47,

C57, C55, C125, C174, C180, C186, MSM21, MSM28, MSM31, MSM41, MSM42, MSM43, MSM48)

Response: DTI believes the 21-acre Myersville site, and the design of the compressor station facilities as proposed, will minimize any impact to the community. It is alongside the interstate, next to a sewage treatment facility, and across the road from the only other industrial site in the region. A site that is feasible in terms of natural gas hydraulics, constructability, and reasonable access to the pipeline is needed. This site fits those requirements. During the 2008 scoping process for a similar project, Maryland residents suggested the company select an industrialized location with enough acreage to minimize the visual impact of the station. The project was suspended in mid-2008, not because of public opposition, but due to technical aspects and complexities with the proposed gas storage facilities.

When DTI started planning the current Allegheny Storage Project and a compressor station in Frederick County, the previous project's public comments were taken into account. DTI searched extensively for industrialized sites within the acceptable limits of a 12-mile hydraulic study corridor. No sites currently zoned for industrial use could be located within the study corridor limits. However, the location of the proposed 21-acre Myersville site does provide a more industrialized setting and a natural vegetative barrier to minimize visual impacts.

COMMENT SUMMARY 4-2: The proposed Myersville compressor station site is not appropriate and should be relocated to an industrial zoned area that is not near any residences, farms, schools or commercial businesses. (C30, C50, C128, C198, C146, C167, MSM20, MSM25, MSM28, MSM41)

Response: In an effort to maximize the area of DTI's pipeline that would be suitable for locating this compressor station, DTI completed a hydraulic study of the pipeline's capabilities. The results of this study identified this maximum area to be a 12-mile corridor along the pipeline. DTI completed an extensive search for potential sites within this 12-mile corridor. There are no properties available within this corridor currently zoned for industrial use. The only property identified within the hydraulic study corridor that is zoned for industrial use is the Albans tractor facility, located on the opposite side of Milt Summers Road and directly adjacent to the proposed compressor station site.

DTI believes the 21-acre Myersville site, and the design of the compressor station facilities as proposed, will minimize any impact to the community. It is alongside the interstate, next to a water treatment facility, and across the road from the only other industrial site in the region. A site must be feasible in terms of natural gas hydraulics, constructability, and reasonable access to the pipeline. This site fits those requirements.

COMMENT SUMMARY 4-3: DTI should consider other alternative industrial sites including the East Alcoa plant south of Frederick, MD, a site located near the intersection of the

DTI pipeline with Highway 15, or at the existing storage facility in Jefferson. (C31, C167, C183, S4, C193, MSM20, MSM22, MSM55)

Response: The East Alcoa site is outside of the limits of DTI's hydraulic study corridor and too far off the PL-1 pipeline corridor to be economically feasible. Therefore, this location would not meet Project feasibility requirements.

Based on the location description provided in the comment, DTI assumes the Highway 15 site is located near Point of Rocks, and was previously recommended by public comment as a FERC approved site for a former Duke Energy project in 2002. This site was investigated by DTI in 2008 and determined to be located more than five miles south of the southern limits of DTI's hydraulic study corridor. Therefore, this location does not meet Project gas hydraulic feasibility requirements.

The Jefferson alterative site is still considered a viable alternative by DTI because the property was available for sale on the open market, DTI operates a small industrial gas M&R station on adjoining property and the proposed site bordered a high-noise highway corridor that would, in turn, minimize the noise impact associated with the facilities. However, during the FERC scoping process for the previous project, the public encouraged DTI to search for a more industrialized location where additional acreage might also be available to minimize the visual impact of the compressor station for residents located close to the site. In response, DTI's continued its site review process and selected the Myersville site.

COMMENT SUMMARY 4-4: Spills or leaks at gas compressor station will impact fragile waterbodies and public drinking water supplies. Alternative locations that do not impact waters should be identified. (C180, C167, C163)

Response: It is not possible to site a compressor station in a location that would not, in some manner, have the potential to impact water resources. DTI will implement a SPCC Plan during construction and operation of the Myersville compressor station and pipeline facilities. In addition, during construction, DTI will employ best management practices (BMPs) included in the FERC's Plan and Procedures to control erosion and minimize impacts on water resources.

COMMENT SUMMARY 4-5: Will the FERC require an analysis of other potential alternative sites to satisfy the affected residents in Frederick County that the economic costs and environmental disruption from construction and operation of a new compressor station along the pipeline will be minimized under the standard of meeting public convenience and necessity? (S2-14)

Response: To obtain approval for construction and operation of the Allegheny Storage Project, DTI must file a detailed plan with the FERC that includes an environmental report consisting of twelve resource reports, documenting potential impacts, proposed

mitigation measures, and alternatives considered. The FERC, during its independent review of the Project, may require the assessment of other alternatives.

The Commission has the authority to approve the location of the compressor station and associated pipeline through its Certificate. Before the Commission will authorize a Project, Commission staff conducts an environmental review of the Project to evaluate the Project's anticipated impact on the public and the environment, and considers reasonable alternatives to the proposed action. Commission staff will also conduct a thorough review to determine if the Project is in the public interest. This review includes an evaluation of need for the Project, costs of transporting natural gas by the pipeline, financing and market competition.

COMMENT SUMMARY 4-6: If other alternative sites are considered, will the FERC inform the public why the Myersville site is considered the optimum location under the public convenience and necessity standard? (S2)

Response: An Environmental Assessment (EA) will be prepared by the FERC as part of their review of the Project. This assessment will include a detailed discussion of the alternatives considered for the Project and the results of FERC's analysis including their concurrence or rejection of the proposed compressor station site and facilities as the best option to achieve the Project goals.

COMMENT SUMMARY 4-7: Proposes the formation of an active working group comprised of members from the community, government and the utility to fully research possible future sites. (S6)

Response: DTI is committed to working with landowners and other stakeholders in an ongoing effort to better understand and address the interests and concerns of these groups regarding the Allegheny Storage Project. DTI's goal is to develop a Project that provides benefits to natural gas customers and to the community. DTI will work with all landowners, local communities, and governing bodies to ensure that they are aware of the Project and updated as it progresses. It is DTI's policy to work with the appropriate agencies to ensure that the facilities are developed and operated to meet or exceed all safety, environmental, regulatory and legal requirements.

COMMENT SUMMARY 4-8: FERC should deny DTI's application based on overwhelming public opposition and should exclude Myersville and other towns in Frederick County as possible sites for a gas compressor station. (C118, S3)

Response: The Commission considers public comments in its evaluation of the need for the Project.

COMMENT SUMMARY 4-9: Has DTI explored utilizing solar to power the station? (C195)

Response: Renewable energy sources, such as solar, are expected to play an increasingly prominent role in meeting U.S. energy demands in the coming years. Despite the growing support for renewable energy, significant long-term investment, as well as advances in technology and development, is necessary before these sources could potentially offset a substantial portion of the projected national energy demand. Therefore, renewable energy sources will not provide sufficient energy supplies in the near future to eliminate the need for the Project.

COMMENT SUMMARY 4-10: DTI should consider system alternatives to their existing pipelines and aboveground facilities that would not require a new compressor station. (C167, C173, C195)

Response: DTI has considered system alternatives as documented in Resource Report 10. Following review of reasonable system alternatives to serve the Project purpose, DTI considers the construction of a compressor station to be the least intrusive alternative, having less environmental and landowner impact, than laying miles of new large diameter pipeline as a means to address anticipated peaking requirements on the existing PL-1 pipeline.

COMMENT SUMMARY 4-11: The average distance between compressor stations is 40 to 100 miles. The distance between the Chambersburg, Pennsylvania and Leesburg, Virginia compressor stations is 50 miles. Why is another compressor station required? (C167, C183, C195, MSM33, MSM42)

Response: While the referenced 40- to 100-mile spacing distance may be considered an industry average, the required spacing of compression facilities is a function of gas hydraulics which is affected by the gas velocity and pressure drop along the pipeline. The actual pipeline distance between DTI's Chambersburg and Leesburg facilities is 73.5 miles. The hydraulics studies conducted for the Project identified a 12-mile corridor in Frederick County as the necessary location for a compressor station to transport the incremental natural gas volumes.

COMMENT SUMMARY 4-12: Describe DTI's compressor station site selection process and criteria and reconsider the use of the alternative Middletown site. (C183, C195, G1, C46, C180, G1, MSM25)

Response: The location for the new compressor station in Maryland required that it be sited within a specific corridor on DTI's existing PL-1 pipeline system to boost pressure in the PL-1 pipeline to maintain the operating pressure at a level required for peak deliveries. DTI performed hydraulic studies to determine the most advantageous location for the required peaking compression. This initial study identified a 6-mile-long corridor along the PL-1 pipeline, 3 miles north and 3 miles south of the hydraulic center.

It is operationally advantageous to locate incremental compression somewhat equidistant from existing compression in order to take advantage of line pack between such stations during transient flows. Moving the compression too close to the next station does not allow for as much line packing and drafting capabilities. One site was identified near Middletown that was available for sale, was within the preferred limits of the first Hydraulic Study (Hydraulic Study 1), and was somewhat equidistant between the outer limits of the hydraulic study. However, multiple public comments received during the scoping process prompted DTI to search for a more industrialized area to locate the compressor station.

Because no suitable alternative sites could be located within the original hydraulic study limits, DTI then expanded the hydraulic study to the maximum acceptable limits of a 12-mile-long corridor along the PL-1 pipeline, centered on the original hydraulic center (Hydraulic Study 2).

The results of this study increased the number of possible locations where compression might be developed. After a detailed review of sites available within the expanded 12-mile hydraulic study corridor that could accommodate the station, four additional sites were identified. DTI initially focused on a site in Jefferson, MD because the property was available for sale on the open market, DTI operates a small industrial gas M&R station on adjoining property and the proposed site bordered a high-noise highway corridor that would, in turn, minimize the noise impact associated with the facilities. Again, during the scoping process for that project, the public encouraged DTI to search for a more industrialized location where additional acreage might also be available to minimize the visual impact of the compressor station for residents located very close to the site.

Ultimately, the proposed Myersville site was identified as the preferred site as the property is for sale on the open market, has sufficient acreage (21 acres), provides excellent access, has good constructability qualities, is located in a commercial/industrial area adjacent to the high-noise I-70 corridor, and provides excellent natural vegetation for screening purposes to minimize any public visual impacts. The only minor disadvantage to other viable alternatives, in Middletown and Jefferson, is its distance from DTI's PL-1 pipeline system (0.6 mile).

In summary, of the eight alternative sites considered, three were eliminated because they were located outside of the expanded 12-mile hydraulic study corridor and therefore considered infeasible and two alternative sites were eliminated because of potential cultural resource issues, constructability issues and because neither location offered an industrialized setting or a visual impact reducing potential that was superior to remaining alternatives. The remaining three sites were all considered viable by DTI but the Myersville site was selected as the preferred location in response to public comments received during the FERC scoping process.

5.0 REGULATORY REVIEW & NEPA DOCUMENT

COMMENT SUMMARY 5-1: Which governmental entity has authority over the Allegheny Storage Project? (C56, C146, MSM3, MSM6)

Response: The following agencies have oversight or regulatory authority over permitting, construction and operation of the Project:

Federal Energy Regulatory Commission	Maryland Department of Natural Resources	
U.S. Department of Transportation	Maryland Historic Trust	
U.S. Environmental Protection Agency	Town of Myersville	
U.S. Fish and Wildlife Service	Frederick County Soil Conservation District	
U.S. Army Corps of Engineers	Frederick County Development Review	
Maryland Department of Environment	Catoctin Soil Conservation District	

COMMENT SUMMARY 5-2: FERC needs to review outstanding legal actions against DTI and DTI should explain why it is allowed to operate its facilities given its history of noncompliance. Actions by DTI have resulted in citations and fines by the Pennsylvania EPA and the USDOT for contaminating ground water, improper disposal of hazardous waste, and failure to perform required inspections of pipes and pressure regulating devices. (C18, C118, MSM16)

Response: In 2009, DTI was cited by the U.S. Department of Transportation (USDOT) for violations of record keeping and inspection requirements. The USDOT later withdrew portions of the violations after receiving clarifying information from DTI. DTI maintained that some of the remaining violations occurred because DTI had interpreted USDOT regulations in a manner consistent with certain regulatory guidelines. However, the USDOT ultimately rejected DTI's interpretation. DTI has since addressed all of the violations and has fully complied with the terms of the USDOT's compliance order. DTI shares USDOT's commitment to pipeline safety and has cooperated with them throughout this matter.

In 2005, DTI entered into a settlement with the Pennsylvania Department of Environmental Protection (PADEP) and the Pennsylvania Department of Conservation and Natural Resources (DCNR) related to the final closure of a 1989 Consent Order and Agreement (COA) involving the past disposal of hazardous materials at some of its gas storage stations. According to the COA, DTI conducted assessments and site remediation as needed at each of its facilities in Pennsylvania to address any potential contamination from those past disposal practices.

COMMENT SUMMARY 5-3: Describe the authority FERC has to over-ride local zoning laws. (C185, MSM51)

Response: The FERC encourages an applicant to comply with local zoning regulations and it is DTI's intent to do so. It is DTI's understanding that Myersville

zoning districts may be superimposed on other zoning districts to permit uses otherwise disallowed in a particular district or to impose supplemental restrictions on uses in the district. The HEO district (in which the proposed compressor station is located) may only be superimposed in the General Commercial zoning district. Therefore, the use is allowed, but must meet requirements and special conditions consistent with the Town of Myersville Comprehensive Plan and HEO district criteria. While the FERC encourages cooperation between interstate pipelines and local authorities, this does not mean state and local agencies, through application of state and local laws, may prohibit or unreasonably delay the construction or operation of facilities approved by the FERC.

COMMENT SUMMARY 5-4: What role does the U.S. Environmental Protection Agency have in the FERC review process? (C195)

Response: The USEPA has delegated water quality certification (Section 401) to the jurisdiction of individual state agencies, but the USEPA may assume this authority if no state program exists, if the state program is not functioning adequately, or at the request of a state. In addition, the USEPA has the authority to review and veto U.S. Army Corps of Engineers (USACE) decisions on Section 404 permits. The USEPA also has jurisdictional authority to control air pollution under the Clean Air Act (CAA) by developing and enforcing rules and regulations for all entities that emit toxic substances into the air. In addition to its permitting responsibilities, the FERC may request that the USEPA to participate as a cooperating agency in the preparation of the EA.

COMMENT SUMMARY 5-5: The USACE, Baltimore District noted that fills or earth disturbances within a river, stream, wetland or other water would require authorization from this office under Section 10 of the Rivers and Harbors Act and/or Section 404 of the Clean Water Act. In planning future development every effort should be made to avoid and minimize river, stream, wetland or other water impacts to the fullest extent practicable. (F1)

Response: DTI will seek and obtain all necessary environmental permits to construct and operate the Project including permits from the USACE and MDE. These permit reviews will include a thorough examination of the Project to ensure efforts have been made to avoid and minimize impacts wetland and waterbodies to the fullest extent practicable.

COMMENT SUMMARY 5-6: The EA should not be prepared by DTI. Who will verify the content of the EA? (C56, C182, C183, C193, MSM3, MSM7)

Response: The FERC prepares environmental documents for all proposed natural gas projects in accordance with its regulations implementing the National Environmental Policy Act (NEPA). These documents include categorical exclusions, EAs, and environmental impact statements. Where an EA is determined to be the appropriate level of environmental analysis, there are three options for preparing the EA, FERC can: (1) prepare the EA without consultant assistance, (2) work with a third-party consultant, or (3) finalize a draft EA provided by the applicant (called an applicant-prepared draft EA).

An applicant-prepared draft EA can only be used in conjunction with the pre-filing process, which DTI requested on July, 19, 2011 and FERC approved on July 28, 2011. DTI will prepare a draft applicant-prepared EA for the Project. This document will then be used by FERC to develop and finalize its EA for the Project.

COMMENT SUMMARY 5-7: DTI did not provide sufficient notification of the Project and should expand the area of landowner notification to 2.0 miles around the proposed compressor station site(s). (C165, C183, MSM23)

Response: DTI notified landowners in accordance with the requirements in 18 CFR §157.6(d)(2) of the FERC's regulations. These regulations require that DTI notify in writing all landowners within a 0.5-mile radius of a proposed compressor station or its enclosure, and that DTI publish a notice twice in a daily or weekly newspaper of general circulation in each county in which the Project facility is located. These same notifications will be repeated when DTI files its formal application with the FERC in early 2012.

Additional public outreach efforts included DTI communications (through letters, meetings, phone calls, or e-mails) with state, county, and local agencies and representatives; and more specifically, a meeting with the Myersville Town Council on September 7, 2011 and a public Open House on September 26, 2011. The FERC initiated its own public outreach program for the Project with its NOI issued on October 24, 2011, and with the public scoping meeting conducted on November 7, 2011 in Myersville.

COMMENT SUMMARY 5-8: The FERC public comment period should be extended and the review process should be slowed down to allow the public time to understand DTI's proposed Project. (C165, C166, C183, C180, MSM7, MSM 21)

Response: The FERC follows its NEPA review process including opportunities for public comment. DTI will file its FERC application in February 2012 and plans to begin construction in early 2013.

COMMENT SUMMARY 5-9: DTI should be required to submit its application to the Town of Myersville. (C183)

Response: All documents submitted to the FERC are available for viewing on the FERC's website at www.ferc.gov using the eLibrary link and the Docket Number PF11-9.

6.0 HEALTH, SAFETY, AND EMERGENCY RESPONSE

COMMENT SUMMARY 6-1: The proposed Myersville Compressor Station would create a public health risk and impact quality of life. These impacts should be analyzed in an

independent environmental impact study. (C1, C27, C38, C63, C146, MSM17, MSM20, MSM23, MSM26, MSM28, MSM33, MSM35, MSM39, MSM42, MSM46, MSM55)

Response: DTI does not believe that the compressor station will create a public health risk or impact the quality of life if designed, constructed, and operated as proposed and as required by federal and state regulations.

Quality of Life: The location and design of the proposed Myersville Compressor Station would not significantly affect the community of Myersville. It is not a mega industrial complex, but a small compressor station with one full-time employee and two to four support employees. With incorporation of the proposed design and mitigation measures for air and noise, as well as implementation of proposed facility screening, the compressor station would not alter the existing character of the landscape or be particularly noticeable.

Air: The facility will be equipped with a catalyst to control hazardous air pollutants, including carcinogens such as benzene or formaldehyde. As a result, there would be a lower emission rate per unit of combustion for the compressor station than with typical gas-burning facilities, such as furnaces and boilers. Under standards developed by the USEPA and the state of Maryland that are developed to protect the public, the facility would be classified as a minor source of hazardous air pollutant. The facility must be in compliance with federal and state air quality standards for all criteria pollutants that have been established by the USEPA and the state, and are designed to protect the health of the public.

<u>Water</u>: Water use will be limited to sanitary use for facility employees and occasional washing of equipment. SPCC Plans will be implemented during construction and operation of the facility to prevent stored or used petroleum products from being released or spilled and reaching surface or groundwater. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two aboveground storage tanks (wastewater and gas liquids).

<u>Public Safety Risk</u>: DTI designs, constructs, operates and maintains its facilities in accordance with all federal and state standards that are designed to protect the public and minimize risks for accidents. DTI regularly patrols, inspects, tests, repairs, and maintains its pipelines and compressor stations.

Noise: DTI will incorporate state-of-the-art noise mitigation equipment into the design of the compressor station to maintain the existing overall sound levels at all public noise sensitive areas, including residences. An independent noise consultant completed an ambient noise study, which confirms that with the proposed noise mitigation measures, nearby residences would not experience any increase in current noise levels. FERC will require DTI to incorporate the proposed noise mitigation measures into the

station, and to conduct a post-construction noise analysis to verify all noise requirements are successfully achieved.

FERC is conducting an environmental review of the Project and will issue the appropriate NEPA document.

COMMENT SUMMARY 6-2: The proposed compressor station is located too close to the town of Myersville, its residences, schools, businesses, and roadways (I-7 and Route 17). There are more than "1,800 people in residences and businesses, including dozens of working farms" within 4 miles of the site and there are four schools, a day care center, restaurants, churches, and residential subdivisions in close proximity to the site. The station is too close to I-70 which carries 65,000 motorists each day and Route 17. Myersville is a "densely populated, rural community of 1,500 (2,000 people per square mile)" and is unsuited for an "industrial infrastructure with its attendant environmental and safety risks." (C1, C2, C3, C4, C11, C15, C18, C22, C27, C30, C31, C32, C39, C46, C50, C51, C52, C59, C63, C118, C119, C120, C125, C128, C128, C163, C173, C174, C176, C177, C182, C186, C188, C189, C190, C193, C195, S2, S4, MSM17, MSM21, MSM25, MSM29, MSM31, MSM37, MSM38, MSM42, MSM49)

1. Response: According to the U.S. Energy Information Administration, the U.S. natural gas pipeline network includes 305,000 miles of interstate and intrastate transmission pipelines and more than 1,400 compressor stations (2011). All pipeline facilities must be designed, constructed, operated, and maintained in accordance with the USDOT Minimum Safety Standards in CFR Title 49, Part 192. These regulations have been established to protect the safety of the public. In addition to the USDOT, pipeline facilities are subject to standards and regulations of the FERC, Office of Pipeline Safety, National Transportation Safety Board, United States Coast Guard, Federal Emergency Management Agency and state jurisdictional agencies.

DTI designs, constructs, operates, and maintains its facilities in accordance with all applicable federal and state standards designed to protect and minimize risk to the public. Key safety features and devices required by the USDOT for the compressor station include:

- Over-Pressure Protection Systems: The station piping will contain multiple relief valves and pressure regulation devices designed to ensure operating pressures are not exceeded.
- Gas Detection System: The compressor building will include a technologically advanced gas detection system, which continuously monitors for the presence of natural gas inside the building. If gas should be detected at a low level, ventilation fans are activated. If gas continues to be detected at increasing levels (builds up), the Emergency Shut-down system described below would be activated and the station would shut-down automatically.
- <u>Ultraviolet Fire Detection System</u>: Should any open flame or fire be detected, the station would shut-down automatically.

• <u>Emergency Shut-down</u>: In the event of significant gas detection or fire in the compressor building, the facility would vent all yard piping of the fuel source from the facility piping as quickly as possible.

In addition, DTI's Gas Control Centers operate 24 hours a day, seven days a week and monitor the pipeline system with sophisticated computer and telecommunications equipment that can detect fluctuations and control flows. The Gas Control Center is aware immediately if the pressure within a pipeline falls and can stop the gas flow to the problem area by selectively isolating sections of the pipeline until inspections are completed to determine the cause of the problem and complete repairs. This constant monitoring and rapid response to change ensures that the pipeline system operates safely and reliably.

COMMENT SUMMARY 6-3: In the event of an emergency or explosion, what plans are in place to handle emergency response with regard to evacuation and rerouting of motorists on adjacent highways (I-70 and Route 17); evacuation of nearby businesses, residences, and schools; fire response; and set up of emergency shelters? (C1, C34, C65, C118, C125, C128, C147, C163, C166, C167, G1, G3, G7, C180, C182, C195, MSM31)

Response: As required by USDOT regulations, DTI must prepare a site-specific Emergency Response Plan for the proposed compressor station that would be implemented at the time the station begins commercial service. DTI will work with Myersville and Frederick County officials to develop an emergency plan that fits into the local community's emergency plans and addresses site-specific issues that may arise in the event of an emergency or accident. The Emergency Response Plan will include contact information, safety alarms, roles during emergencies, maps, evacuation procedures, and accident investigation procedures.

DTI will develop relationships with fire and rescue agencies, police departments, and public officials. This will include conducting site visits and tours of the compressor station facility, as well as annual education sessions that:

- Allow emergency responders to understand the function of the DTI facilities and what steps are taken to assure that it operates safely;
- Provide emergency responders knowledge of DTI's capability to respond to an emergency;
- Establish expectations for and identify roles of both DTI personnel and emergency responders; and
- Establish communication channels for coordinating mutual assistance.

When DTI initially communicates with any emergency response units, DTI will indicate the facilities involved, the design and operating parameters, the nature of the product involved and the details of the response to the situation. Normally DTI will dispatch personnel to the area immediately. DTI will also establish and maintain mobile communications with the site until the emergency has been resolved.

In any emergency, accurate communication and quick cooperation between DTI and fire or police units is essential. Implementation of DTI's Emergency Response Plan will include a call to the local 911 center (or first-responder fire department if there is no 911 service) and/or law enforcement notifying them of the situation and requesting assistance, if necessary. Company employees on the scene or local emergency personnel will notify nearby residents, who will be evacuated if the situation warrants. Nonresident landowners will be notified by phone or mail depending on the situation and the availability of the landowner. County officials, such as the emergency response coordinator, will be notified by company employees, either immediately or as soon as possible. The first priority of DTI is to protect human life.

Federal code requires notifications to USDOT's Office of Pipeline Safety for incidents and safety-related conditions. Required local contacts would be made by the DTI's Operations Department.

COMMENT SUMMARY 6-4: I-70 is the primary western evacuation route for the Washington, DC area and for Frederick, Maryland. An accident at the compressor station could require closing of I-70 and would affect evacuation routes for Washington, DC and Frederick. (C40, C41, C172)

Response: The proposed compressor station is located in a centralized area of a 21-acre parcel that has sufficient buffer to accommodate an accident at the station without requiring closure of the south/east bound lanes of I-70, the nearest lanes to the station, or the north/west bound lanes of I-70. Both Washington, DC and Frederick, Maryland are located south/southeast of the proposed compressor station site and people evacuating those cities would use the north/west bound lanes of I-70, the furthest lanes from the compressor station site. While it is highly unlikely that an evacuation occurs at the same time that an accident at the compressor station closes down both lanes of I-70, this scenario can be addressed in DTI's Emergency Response Plan that will be developed before the station goes into operation.

COMMENT SUMMARY 6-5: DTI has been cited in the past for violations on safety, hazardous waste disposal, and failure to inspect and maintain equipment. These violations should be considered in review of this project as well as how DTI's safety record compares to the industry as a whole. (C3, C1, C11, C15, C21, C25, C57, C59, C65, C118, C167, C180, C182, C186, MSM16, MSM24)

Response: DTI has resolved any past citations issued by USDOT and/or other state agencies, and is committed to comply fully with all applicable state and federal pipeline safety regulations. The Commission will consider DTI's record as appropriate during review of DTI's application.

COMMENT SUMMARY 6-6: Security (chain link fence and security cameras) is not sufficient to protect the station from a terrorist attack. (C40, C41, C54, C56, C118, C163, MSM47)

Response: DTI maintains a Critical Gas Facilities Security Plan which addresses the assessment of risks to its facilities. This risk assessment process includes sabotage, terrorism, theft and diversion, cyber threats, security breaches, and security incidents. DTI Corporate Security, working with DTI Management, conducts ongoing risk assessment of its facilities utilizing the continual risk management methodology. This risk management methodology assesses historical and projected risks. The security plan implements a security strategy that includes the development of close working relationships with local, state, and federal law enforcement agencies responsible for DTI sites throughout the DTI footprint. These relationships include the sharing of risk/threat information pertaining to DTI facilities. The security strategy also includes an ongoing training program for DTI personnel on the security topics such as the signs of terrorism, sabotage, and suspicious incidents, including reporting of such incidents to DTI Management, DTI Security, law enforcement, and the appropriate state and federal regulatory agencies. The facility will be manned on a daily basis and monitored remotely by DTI security personnel when unmanned. Security measures to be utilized would include security fencing, gates, multiple cameras and low-intensity peripheral lighting. Also, see the response to Comment Summary 3-8.

COMMENT SUMMARY 6-7: Wikipedia provided a list of pipeline accidents in 2010. DTI should provide a record of accidents on its facilities and explain what procedures are in place to prevent these kinds of accidents. (C118)

Response: Wikipedia listed 47 incidents in 2010, including releases of liquids. Only one of these involved a compressor station and there were no reported injuries. As stated in the previous responses, DTI is committed to comply fully with all applicable state and federal pipeline safety regulations.

COMMENT SUMMARY 6-8: I-70 carries "many vehicles that transport hazardous/ flammable/explosive material" and an accident could cause the vehicle to catch fire, resulting in a fire or explosion at the compressor station. (C167, C195)

Response: The planned compressor station facility would be constructed in a centralized area of a 21-acre land parcel. There is sufficient buffer space within the property to minimize the risk of any induced incidents due to vehicles on I-70.

COMMENT SUMMARY 6-9: The construction and operation of a "liquid natural gas" compressor station in proximity to Fort Detrick in Frederick, Maryland would introduce "confounding elements to the national security of the United States" and "gratuitous risk to our national security, the health and safety of the citizens of Frederick County, MD and to all citizens of the United States." (C172)

Response: The proposed compressor station at Myersville is not a liquid natural gas (LNG) facility. Fort Detrick is located about 12 miles southeast of the proposed compressor station site in Frederick, Maryland. Fort Detrick is described as a U.S. Army

Medical Command installation comprising of a 1,200 acre campus that supports a multi-governmental community that conducts biomedical research and development, medical material management, global medical communications and the study of foreign plant pathogens. An incident at Fort Detrick would not affect operations at the Myersville Compressor Station site, nor would an incident at the Myersville Compressor Station site affect operations at Fort Detrick.

COMMENT SUMMARY 6-10: What checks and balances will be in place to guarantee that DTI will perform the necessary inspection and maintenance of their facility? (C182)

Response: DTI must comply with USDOT regulations, which require inspection and maintenance of all pipelines and compressor stations on its natural gas transmission system. In addition, the Pipeline and Hazardous Materials Safety Administration (PHMSA), established in 2005 as an agency within the USDOT, manages a national pipeline safety inspection and enforcement program to ensure pipeline operators comply with the regulations.

COMMENT SUMMARY 6-11: DTI has indicated that their PL-1 pipeline is 35 years old. Is the pipe is designed to accommodate the increase in "pressure and velocity" following the addition of the compressor station and will the additional flows add to or exacerbate corrosion and lead to unsafe conditions? (C165, C180, MSM31)

Response: DTI's PL-1 pipeline system in Frederick County has been designed, tested and properly maintained to withstand the pressures required by the Project. The pipeline is internally inspected regularly, as required by the USDOT, and is known to be in excellent condition. The pipeline is cathodically protected and fully coated to prevent corrosion, which with appropriate maintenance extends the life of the pipeline system indefinitely.

DTI routinely patrols, inspects, tests, repairs, replaces, and maintains its pipelines and compressor stations. Patrols include both aerial (via aircraft) and ground-based surveillance as is required by USDOT. These patrols provide information on erosion, exposed pipe, possible encroachment, possible leaks, and other conditions that may affect the safety and operation of the system. Should a leak be detected, DTI implements immediate response to repair the leak or replace the pipe segment. DTI's ongoing improvement plan also involves replacing older pipeline segments when needed.

COMMENT SUMMARY 6-12: What are the safety and emission standards for main gas filtration equipment, fuel gas filtration equipment, storage tanks and process piping? How will this equipment be monitored for compliance with safety and emission standards? Specify the safety procedures that will be used to minimize potential for spills during the transfer of product from main processing to storage tanks. Specify the additional emission risks associated with the storage of gas products and/or waste. Specify measurements and other monitoring procedures that will be used to ensure safety and emission standards are met. (C180)

Response: The proposed compressor station would include a gas filter-separator to remove condensed water and/or hydrocarbons from the natural gas prior to compression. The liquids separated by this vessel would be pumped to a small hydrocarbon storage tank that includes secondary containment for storage as well as for the transfer of the fluids to a tanker truck for off-site disposal. There are no regulated air emissions associated with these facilities or associated process piping.

During construction, DTI will comply with the FERC's Plan and Procedures and the MDE's Construction Stormwater Permit requirements to prevent construction-related spills and materials from reaching the ground or groundwater and address secondary containment of any chemical storage.

After construction is complete and before the facility becomes operational, DTI will implement a station-specific SPCC Plan, designed to comply with USEPA requirements under the CWA. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). Other than those items already mentioned, the primary chemicals used at the station will consist of lubricating oil and coolants. All waste materials will be transported to a licensed disposal facility for proper handling.

COMMENT SUMMARY 6-13: How long will the constituents of natural gas, such as ethane and methane, be stored awaiting transportation? Are there regulations that specify safety standards for storage and who monitors this activity? (C180)

Response: The chemical composition of natural gas includes methane (about 96 percent) and ethane (about 1.5 percent). As natural gas is compressed, these constituents will pass through the station as natural gas but will not be stored on site. There are no regulations or safety standards for natural gas beyond those mandated by the USDOT for pipelines and compressor stations in 49 CFR Part 192.

COMMENT SUMMARY 6-14: DTI should provide annual safety reporting for all of DTI's compressor station sites for the past 10 years as submitted to the EPA and the state Departments of Environmental Protection in Pennsylvania, West Virginia, Virginia, Ohio, New York and Maryland. (C118)

Response: There are no federal or state requirements to provide safety reports to the EPA or state.

7.0 WATER RESOURCES

COMMENT SUMMARY 7-1: How will DTI protect groundwater and surface water supplies, including public and private groundwater wells, and local surface waters including Grindstone Run and Catoctin Creek? These resources could be contaminated from construction

and operation of the Myersville facilities and this could impact water quality, the community, and local farms. Since Grindstone Run, a tributary of Catoctin Creek, is within the Chesapeake Bay watershed, any contamination to the creek would be in direct opposition of the statewide effort to preserve the Chesapeake Bay. (C1, C3, C11, C4, C15, C39, C57, C65, C118, C128, C147, C180, C182, C183, C188, C193, S2, MSM17, MSM18, MSM20, MSM24, MSM31, MSM50)

Response: During construction, DTI will implement the BMPs in the FERC's Plan and Procedures and the MDE's Construction Storm Water Permit requirements to prevent construction-related spills and materials from reaching the ground, and, ultimately, to surface in groundwater. As part of its BMPs, DTI has prepared a SPCC Plan to identify preventative and mitigative measures that will be employed to minimize the environmental impact associated with inadvertent spills or releases of fuel, lubricant, or hazardous materials during construction of the Project. These measures and any additional permit requirement will be implemented by the construction contractor, and monitored by DTI's inspection staff, during construction of the Maryland facilities. In addition, each construction contractor on the Project will be required to prepare and implement a job-specific SPCC Plan which will be submitted to DTI prior to commencement of construction.

After construction is complete and before the facility becomes operational, DTI will prepare and implement a station-specific SPCC plan, designed to comply with USEPA requirements under the CWA, and to prevent stored or used petroleum products from being released or spilled and reaching surface or groundwater during operation.

COMMENT SUMMARY 7-2: Require the compressor station to be built within an impermeable containment structure wherever hazardous solvents, coolants or other hazardous materials are to be used and require a remediation plan to address any possible contamination events. (C128, MSM24)

Response: The planned compressor station will include a gas filter-separator to remove condensed water and/or hydrocarbons from the natural gas prior to compression. The liquids separated by this vessel would be pumped to a small hydrocarbon storage tank that includes secondary containment for storage as well as for the transfer of the fluids to a tanker truck for off-site disposal.

DTI will also implement its station-specific SPCC plan, designed to comply with USEPA requirements under the CWA and to prevent stored or used petroleum products from being released or spilled and reaching surface or groundwater. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). Other than those items already mentioned, the primary chemicals used at the station will consist of lubricating oil and coolants. All waste materials will be transported to a licensed disposal facility for proper handling.

COMMENT SUMMARY 7-3: Require a comprehensive groundwater location and surface water flow study for the Project area as well as continuous monitoring of the groundwater and surface water in the area and provide frequent (quarterly) reports to the town of Myersville. (C128, C182, MSM50)

Response: Water use will be limited to sanitary use for facility employees and occasional washing of equipment. No water is used for compression or any industrial process at the facility. To construct the Project, DTI must first obtain a Certificate from the FERC as well as environmental permits from federal and state agencies including the USACE and MDE. These regulatory bodies are charged with reviewing the Project and determining if the proposal meets the regulatory requirements. Groundwater and surface waters impacts are included in this review process. DTI will comply with any permit conditions issued by these regulatory agencies to protect water resources as well as implement its own Company environmental protection policies.

COMMENT SUMMARY 7-4: Extend the analysis to include all areas around the adjacent BP gas station and Alban business site as past groundwater contamination at or near these sites may have a unique and cumulative effect on the issue of groundwater contamination. (C180-38)

Response: A search of hazardous waste sites was conducted through available MDE geographic information system data and the USEPA (USEPA, 2011b; USEPA, 2011c; USEPA, 2011d). Based on the review, no hazardous waste sites were identified within 0.25-mile of the proposed station area. Since no known hazardous waste sites within 0.25-mile of the station were identified, it is not anticipated that any contaminated groundwater will be encountered during construction and/or operation of the station.

COMMENT SUMMARY 7-5: Explain why the construction of pipeline from Mt. Tabor Road valve site to the Milt Summers Road station site will not disturb or cross areas previously contaminated by the BP gas station and/or Alban business site. (C180, MSM31)

Response: The suction/discharge pipelines will be buried at a depth of approximately 6 feet, which allows for 3 feet of cover (as required by the USDOT) over the 30-inch-diameter pipelines. In the Myersville area, groundwater is encountered between 30 and 400 feet below the ground surface, and is over 20 feet below any construction disturbance associated with installation of the pipelines. Any surface or groundwater contamination associated with past spills that have been remediated is 0.2 mile south of the compressor station facilities and pipelines. Therefore, it is unlikely that any contaminated surface or groundwater will be encountered during construction or operation of the Project.

COMMENT SUMMARY 7-6: Provide an independent assessment of the impact to aquifer water supply in the town of Myersville. (C185, MSM21)

Response: With implementation of the BMPs included in the FERC's Plan and Procedures, the MDE's Construction Storm Water permit requirements, DTI's

construction and station-specific SPCC Plans, and station design that includes secondary containment for the compressor building, drum storage building, and two aboveground storage tanks (wastewater and gas liquids), it is unlikely that station construction or operation will have any direct impact on the aquifer or water supplies for Myersville through a spill.

Although water will be required for sanitary purposes, no process water is required for station operations so there will be no significant water withdrawals from the underlying aquifer.

COMMENT SUMMARY 7-7: The Routzahn-Summers farmstead (F-4-99) (built 1820) is 0.9 mile from the proposed site, at the intersection of Milt Summers and Mt. Tabor Roads. This property has a spring, which could be polluted should there be a leak of any kind at the Compressor Station. (C191)

Response: As stated in the above response, impacts to aquifers, springs, wells, and surface water resources will be minimized to the greatest extent possible through station design and implementation of construction and station-specific SPCC Plans during construction and operation of the facility.

COMMENT SUMMARY 7-8: Additional public hearings should be conducted in conjunction with the MDE to address the sensitivity of the waterbodies for the proposed compressor site. (C180)

Response: DTI is in the process or preparing permit applications for review by the MDE. DTI will adhere to any MDE public hearing requirement during the review of the permit applications.

COMMENT SUMMARY 7-9: The high levels of sediment erosion and the storage of gas liquids and processing wastewater represent a significant environmental impact on waterbodies that are crossed or adjacent to the Project that are protected by the Federal CWA. Myersville has a history of challenges and problems with water. It is imperative that FERC understand the delicacy of our water situation and that any potential for contamination should raise a red flag. (C65, C166, C180)

Response: DTI will implement the FERC Plan and Procedures to minimize impacts from erosion and stormwater runoff during construction. In accordance with the Plan and Procedures, BMPs to control soil erosion and sedimentation of downgradient areas include:

- An Environmental Inspector will monitor all phases of Project construction to ensure that best management practices will be followed;
- Personnel involved in Project construction will attend environmental training to become familiar with environmental requirements included in the Plan and

Procedures, as well as environmental conditions included in any federal or state permits or authorizations for the Project;

- Temporary and permanent interceptor dikes will be installed to reduce runoff velocities and direct water off of the right of way or construction work area;
- Along the pipelines, temporary and permanent trench plugs will be constructed to reduce runoff velocities in the trench during construction and reduce subsurface groundwater movement after the trench is backfilled;
- Erosion control fabric will be placed at dike and drainage swale outlets, on steep slopes, and adjacent to roads and waterbodies;
- Surface contours and drainage patterns along the pipelines will be returned as nearly as possible to original conditions;
- All disturbed ground will be seeded and mulched to encourage revegetation;
- Temporary winter vegetation cover will be established if Project construction is completed too late in the growing season to facilitate permanent vegetation reestablishment;
- Wetland and waterbody crossing procedures to minimize direct stream channel disturbance, prevent hydric soil rutting and compaction, and contain temporary trench spoil piles will be followed; and
- Post construction monitoring will be conducted to identify areas in need of remedial soil stabilization and vegetation re-establishment.
- With implementation of the Plan and Procedures, significant soil erosion is not expected during or after Project construction.

Regarding liquids, the planned compressor station would include a gas filter-separator to remove condensed water and/or hydrocarbons from the natural gas prior to compression. The liquids separated by this vessel would be pumped to small hydrocarbon storage tank that includes secondary containment for storage as well as for the transfer of the fluids to a tanker truck for off-site disposal. This is the extent of gas liquids that will be stored on site. Piping that will contain coolants, such as an ethylene glycol/water mixture (much like the radiator of an automobile) or lubricating oils are designed as closed-loop systems having secondary spill containment protection measures as well as leakage detection and automatic shut-down devices. These piping systems are further subject to the requirements of the station-specific SPCC Plan.

Water is not used for compression or any industrial process at the facility; thus there are no wastewater discharges. Water use will be limited to sanitary use for facility employees and occasional washing of equipment and there will be no significant increase in groundwater withdrawals in the area.

COMMENT SUMMARY 7-10: Provide additional details on the hydrostatic testing process including water source(s), methods of withdrawal, storage, transport, testing procedures, discharge of test water, monitoring of water quality, and potential disruptions to public water supplies. (C180)

Response: The pipelines and station piping will be hydrostatically tested for structural integrity prior to being placed in service. Testing will be completed by capping installed pipe segments with test manifolds, filling these segments with water, and pressurizing this water to levels beyond the maximum operating pressure of the pipeline. Hydrostatic testing will be conducted for this Project in a manner that meets or exceeds the USDOT "Transportation of Natural and Other Gas by Pipeline: Minimum Federal Safety Standards" (49 Code of Federal Regulations Part 192).

DTI will obtain hydrostatic water from clean water sources, such as public water supplies or nearby surface water sources. Hydrostatic test water requirements for the Myersville compressor station and pipelines will total approximately 238,000 gallons. Test water will contact only new pipe, and no chemicals will be added. No desiccant or chemical additives will be used to dry the pipe. Test water will be discharged to ground via appropriate dissipation devices in accordance with the Procedures or transported off site to a permitted disposal facility.

COMMENT SUMMARY 7-11: Who reviews the results of the hydrostatic tests and how is the public notified of the results of the tests? (C180)

Response: DTI will conduct all hydrostatic tests in accordance with applicable federal (USDOT 49 CFR 192, Subpart J) requirements and state permits. At Myersville, the MDE is responsible for the issuance of permits for hydrostatic water withdrawal and discharge, and for review of any required water quality testing results. There is no formal public notice procedure for results of hydrostatic tests.

COMMENT SUMMARY 7-12: The COE, Baltimore District, noted that if wetlands are found and encroachments are planned within wetland areas, they should be accurately delineated and the COE again contacted to determine permit requirements. (F1)

Response: DTI has completed wetland and waterbody delineations at all of the Project sites. Copies of the survey reports are provided in Resource Report 2, Appendix A, available from the FERC website. These survey reports will also be included as part of wetland and waterbody permit applications filed with federal and state agencies.

8.0 WILDIFE

COMMENT SUMMARY 8-1: How will DTI ensure that nesting bald eagles in the Middletown Valley are not disturbed by the noise and emissions produced by the compressor station? (C65, C118, C167, C183, C185)

Response: DTI conducted field surveys to determine the possible presence of threatened or endangered species, and has initiated consultations with both Maryland Department of Natural Resources (MDNR) and U.S. Fish & Wildlife Service (USFWS) Chesapeake Bay Field Office regarding the possible presence of such listed species. The

USFWS responded on October 20, 2011 stating that, except for occasional transient individuals, no federally proposed or listed endangered or threatened species are known to exist within the impact areas and, therefore, no Biological Assessment or further consultation with the USFWS is required. DTI has not received a response to date from the MDNR. Due to the close proximity of I-70, which currently contributes a far greater amount of noise, emissions and vibration to the local area than is predicted to be added by the compressor station facilities, it is not anticipated that the construction and operations of the compressor station would adversely impact the distribution or regional abundance of local wildlife species including the Bald Eagle.

9.0 SOCIOECONOMICS, TRAFFIC, AND PROPERTY VALUES

COMMENT SUMMARY 9-1: The proposed Myersville Compressor Station will provide no benefit or jobs for the Myersville community. What revenues will accrue to the Town and county from taxes generated by the Project. (C26, C27, C29, C56, C60, C63, C65, C128, C177, C183, MSM14, MSM25)

Response: The Project would create approximately 50 to 60 temporary jobs during construction and one permanent job during operation. These workers typically include surveyors, welders, equipment operators, and general laborers and would be hired from Myersville and the surrounding communities. In addition, both non-local and local workers generally spend some portion of their pay locally for the purchase of housing, food, gasoline, entertainment, and luxury items. This would have a positive effect on local economies and could stimulate indirect expenditures within the region as inventories are restocked or new workers are hired to meet construction demand.

Following construction, DTI estimates that the Project will result in approximately \$1 to \$1.3 million in property taxes annually, of which \$226,000 to \$294,000 would be allocated to the Town of Myersville and the remaining \$774,000 to \$1,006,000 would be allocated to Frederick County.

COMMENT SUMMARY 9-2: Increased "truck traffic, refilling and transporting" would adversely affect the town. (C174, MSM31)

Response: Construction of the Project may result in some minor, short-term impacts on the transportation network in the Project areas as existing public highways will be used to transport construction equipment and materials, and workers to the station site. This may result in some increase in traffic volumes on local public roads; however, construction work is typically scheduled during daylight hours (7:00 a.m. to 6:00 p.m.) six days per week; therefore, most workers will commute to and from the compressor station site during off-peak commuting hours. Due to the short-term nature of the construction, traffic flow impacts that do arise are expected to be minor and temporary.

There will be no regular truck traffic during operation of the station as there is no need for refilling or transporting of materials, except on an occasional basis. The natural gas will be transported to and from the compressor station via underground pipelines.

COMMENT SUMMARY 9-3: Access to the proposed Myersville facilities is questionable. Trucks entering and leaving the proposed Myersville Compressor Station would have to travel along an extremely steep stretch of roadway. (C180, MSM31)

Response: Access to proposed Myersville Compressor Station would be along an existing access road from Milt Summers Road that would be improved for station traffic. A new access road would be installed from Mt Tabor Road to the Myersville Valve site. This road would be approximately 0.24 mile long and 20 feet wide and would be maintained within a 30-foot-wide permanent easement. Both of these roads would provide adequate access for vehicles to the Myersville compressor station facilities.

COMMENT SUMMARY 9-4: The proposed compressor station will result in a decrease in property values for residences near the station. (C2, C11, C18, C19, C28, C32, C56, C57, C59, C61, C63, C125, C147, C167, C174, C193, C195, MSM29, MSM30)

Response: National studies, such as Kinnard's "Measuring Residential Price Impacts From Proximity to Natural Gas Transmission Lines, June 1991", have demonstrated no negative effects on land values or selling prices because of proximity to pipelines and natural gas facilities. In fact, land near other commercial or industrial sites can actually increase in value. DTI has constructed and currently operates two compressor facilities near Leesburg, Virginia. There is no indication that property values surrounding the stations have diminished. DTI does not anticipate that the Project would negatively impact property values.

10.0 CULTURAL RESOURCES

COMMENT SUMMARY 10-1: The Catoctin Creek Bridge on Route 17 is listed on Maryland Inventory of Historic Sites (F-4-041). Can it support the increased traffic without affecting its aesthetic value? (C191)

Response: The Catoctin Creek Bridge is south of the proposed compressor station site on Route 17. Most construction materials will be delivered to the site via I-70 as it provides the most direct access from distant locations. The construction work force is expected to be approximately 75 workers, many of which will use I-70 to the site. Others may commute to the site from the south on Route 17. According to the Frederick County Traffic Volume Map (2010), the annual average daily traffic count on Route 17 just south of I-70 is 3,922. If half the workers commuted to and from the site using SR 17, there would be a 2 percent increase in traffic across the Catoctin Bridge for approximately one year. Since these workers would be using trucks or cars for the commute, it is unlikely

that this increased volume would affect the bridge. The operational workforce of 1 or 2 workers would have a negligible impact on the bridge.

COMMENT SUMMARY 10-2: Several sites listed in the Maryland Historical Trust's Inventory of Historic Properties are in the neighborhood of the proposed gas compressor station, not even 1 mile away. For example, the Enos Doub farmstead (F-4-31) is located approximately 0.5 mile from the proposed compressor site. This home was built approximately 1840. (C167, C180, C191)

Response: DTI's independent consultant conducted a historic architectural survey for any structures 50 years old or older within the Area of Potential Effect (APE) for the proposed Myersville compressor station. The APE is defined in the federal regulations as "the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if any such properties exist." The architectural APE was determined to be any area within view of the proposed aboveground construction or clearing of vegetation. Viewsheds to and from the station were terminated where vegetation and/or topography obstructed lines of sight. No historic resources were found to be present within the APE. Therefore, no impact is anticipated on the character or use of listed historic properties near the proposed site.

COMMENT SUMMARY 10-3: The cultural resource survey report should be submitted for public review and comment through FERC. (C180, MSM6)

Response: The cultural resource survey report has been submitted to both the FERC and the state, and is reviewed by archaeologists at FERC and at the Maryland Historic Trust. A summary of the findings is available for public review and comment on the FERC's website in Resource Report 4, and will be included in the FERC EA.

11.0 AGRICULTURE AND SOILS

COMMENT SUMMARY 11-1: Concerned with impacts to agricultural land and nearby farms from spills or leaks of hazardous fluids such as engine coolant or oil. Possible leakage of engine coolant would impact local farming practices, including a nearby chicken farm that is a supplier of eggs. The compressor station does belong near any food source. (C3, C4, C15, C25, C65, C186, C188)

Response: In accordance with the Procedures, DTI will implement a SPCC Plan that identifies preventative and mitigative measures that will be employed to minimize the environmental impact associated with inadvertent spills or releases of fuel, lubricant, or hazardous materials during construction of the Project. These measures will be implemented by the construction contractor or DTI inspection staff during construction of the Project as well as any measures required in permits from the MDE. Each construction contractor on the Project will be required to prepare a job-specific SPCC Plan which will be submitted to DTI prior to commencement of construction.

After construction is complete and before the facility becomes operational, DTI will prepare and implement a station-specific SPCC Plan, designed to comply USEPA requirements under the CWA, and to prevent stored or used petroleum products from being released or spilled and reaching surface or groundwater. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). Other than those items already mentioned, the primary chemicals used at the station will consist of lubricating oil and coolants. All waste materials will be transported to a licensed disposal facility for proper handling.

COMMENT SUMMARY 11-2: Concerned with overall impacts to agricultural land, crops and livestock from compressor station air emissions, noise, and potential groundwater contamination. Specifically, there was concern with potential impacts to grape crops in the surrounding valley from compressor station air emissions. (C60, C4, C65, C188, C31)

Response: Emissions from the proposed station result solely from the combustion of natural gas in a turbine, heater and emergency generator. These types of emissions are the same for any natural gas combustion source, such as a home furnace or any commercial building natural gas boiler. The proposed station is not a manufacturing or processing plant. The facility will be equipped with a catalyst to control hazardous air pollutants, including carcinogens such as benzene or formaldehyde. As a result, there will be a lower emission rate per unit of combustion than typical gas-burning facilities, such as furnaces and boilers. Under standards developed by the USEPA and the state of Maryland that are developed to protect the public, the facility will be classified as a minor source of hazardous air pollutant.

The preliminary noise analysis report indicates that the noise impact from the proposed compressor station would be minimal. The facility will incorporate state-of-the-art noise mitigation equipment into the design in an effort to maintain a net-zero increase in the overall sound levels at all public noise sensitive areas, including residences. An independent noise consultant completed a final ambient noise study that confirms that with noise mitigation measures built into the design, nearby residences will not experience any increase in current noise levels. FERC will require DTI to incorporate the noise mitigation measures recommended for this Project, and a post-construction noise analysis will be conducted to verify that all noise requirements are successfully achieved.

During construction, DTI will implement an SPCC Plan in accordance with the FERC Procedures, BMPs included in the Plan and Procedures, and the MDE's Construction Stormwater Permit requirements to prevent construction-related spills and materials from reaching the ground, and, ultimately, to surface in groundwater. The requirements address secondary containment of any chemical storage and prohibit construction vehicle fueling within proximity to a waterbody or wetland.

After construction is complete and before the facility becomes operational, DTI will implement a station-specific SPCC Plan to prevent stored or used petroleum products from being released or spilled and reaching surface or groundwater. Accordingly, the compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). All waste materials will be transported to a licensed disposal facility for proper handling.

With the incorporation of these measures to protect air quality, noise-sensitive areas and ground water resources, no significant long term impacts to agricultural lands, crops, or livestock are anticipated as a result of the construction and operation of the compressor station.

12.0 GEOLOGY

COMMENT SUMMARY 12-1: Commenters suggest a fault line is located along the South Mountain ridge less than one mile from the compressor station site and the site is underlain by a geologic formation known as the Middletown Gneiss. Given this, concerns have been raised with the geologic stability of the Project area and the potential risks to public health and safety from earthquakes and sinkholes. (S2, C60, C65, C118, C163, C167, MSM16, MSM17, MSM34, MSM49)

Response: DTI must consider the applicable geologic seismic zones established by the USGS at all locations where pipeline and compressor facilities are constructed. The proposed station site is located in a USGS seismic zone 1, which is the second lowest of the six seismic zone risk categories. According to the Maryland Geological Survey, there are numerous faults in the state but none are known or even suspected to be active. DTI has no geological data that suggests a fault line located 1-2 miles from the proposed compressor station would significantly increase the risk of a facility failure.

Bedrock Geology – The bedrock geology beneath the Myersville Compressor Station site has been mapped and identified by the USGS as a metabasalt unit (Zcm) of the Catoctin Formation. This same geology extends northeastward toward the Maryland-Pennsylvania border. Neither of the current maps prepared by the USGS or the Maryland Geological Survey refer to the presence of Middletown Gneiss occurring beneath the Myersville Compressor Station site.

Geologic Faults – Geologic faults shown on the USGS (Frederick quadrangle map) or Maryland Geological Survey (Myersville and Smithburg quadrangle maps). Both maps indicate the South Mountain Fault is located approximately 3.5 miles west of the proposed compressor station site. The northern terminus of a shorter, thrust fault segment is located approximately 1.5 miles due south of the proposed compressor station and occurs in the metabasalt unit of the Catoctin Formation (Zcm) that underlies the site.

This fault is interpreted to have formed more than 400 million years ago in the early Paleozoic and may be even older. Subsequent tectonics during the late Paleozoic Alleghanian Orogeny that encompassed and folded the Short Mountain Fault would suggest tectonic activity responsible for the origin of faults in the vicinity of the compressor station no longer exists.

Earthquakes – The last earthquake in Maryland was recorded on Friday, July 16, 2010 and had a magnitude of 3.6. The earthquake epicenter was estimated at 39.187N, 77.286W, which is located in Montgomery County approximately 10 miles northwest of Rockville, Maryland and approximately 20 miles southwest of the proposed compressor station site in a different physiographic province. Another widely felt and reported earthquake with a magnitude of 5.8 was experienced in the National Capital Area on August 23, 2011. The epicenter for this earthquake occurred at 37.936N, 77.933W near Louisa and Mineral, Virginia and is approximately 125 miles south of the proposed compressor station site. The occurrence of neither of these earthquakes is therefore representative of faults or earthquake activity at the proposed site.

Sinkholes – Although sinkholes are abundant in the Frederick Valley, these karst features occur in areas underlain by dolomite or limestone such as Ordovician age Grove Formation and more abundantly in the Cambrian age Frederick Formation (Brezinski et al., 2003). However, the proposed site and surrounding area are underlain by the metabasalt unit (Zcm) of the Catoctin Formation which is not susceptible or vulnerable to being dissolved by groundwater or subsequent collapse. This is also confirmed by mapping of the Myersville area by the Maryland Geological Survey which identifies no sinkholes in the Catoctin Formation but instead shows the nearest sinkhole to be more than 4 miles northwest of the site in an area underlain by dolomite of the Tomstown Formation (Brezinski, 2009).

13.0 LAND USE, RECREATION, AND VISUAL RESOURCES

COMMENT SUMMARY 13-1: Concerned with impacts on residences near the compressor station site from air emissions, noise, and contamination to Catoctin Creek. (C4, C49, MSM29)

Response: It is not uncommon for natural gas transmission facilities, including compressor stations, to be located in close proximity to public areas, buildings and residences. DTI must design and operate all facilities in full accordance with strict USDOT standards to ensure the safety of the public. The USDOT Minimum Federal Safety Standards stated in CFR Title 49, Part 192 also define area classifications, based on population density in the vicinity of pipeline transmission facilities, which determine more rigorous safety requirements for populated areas.

Emissions from the proposed station result solely from the combustion of natural gas in a turbine, heater and emergency generator. These types of emissions are the same for any natural gas combustion source, such as a home furnace or any commercial

building natural gas boiler. The proposed station is not a manufacturing or processing plant. The facility will be equipped with a catalyst to control hazardous air pollutants, including carcinogens such as benzene or formaldehyde. As a result, there will be a lower emission rate per unit of combustion than typical gas-burning facilities, such as furnaces and boilers. Under standards developed by the USEPA and the state of Maryland that are developed to protect the public, the facility will be classified as a minor source of hazardous air pollutant.

The preliminary noise analysis report indicates that the noise impact from the proposed compressor station would be minimal. The facility will incorporate state-of-the-art noise mitigation equipment into the design in an effort to maintain a net-zero increase in the overall sound levels at all public noise sensitive areas, including residences.

DTI will prepare and implement SPCC Plans during construction and operation of the compressor station. These plans include BMPs to minimize the potential for spills to occur and ultimately surface in groundwater, and to contain and clean up any spills that may occur. The compressor station design includes secondary containment with a sump system within the compressor building, as well as secondary containment for the drum storage building and two above-ground storage tanks (wastewater and gas liquids). All waste materials will be transported to a licensed disposal facility for proper handling.

With the incorporation of these measures to protect air quality and groundwater resources, and avoid any increase in existing noise levels, no significant short or long term impacts to nearby residential areas are anticipated as a result of the construction and operation of the Project.

COMMENT SUMMARY 13-2: Myersville is a small, rural, agricultural community with beautiful views and rich history. The compressor station is not consistent with the existing rural community, and the existing cultural and environmental integrity of the area. It will also set a precedent for other commercial industry. (C4, C15, C65, C180, C22, C31)

Response: DTI believes the 21-acre Myersville site, and the design of the compressor station facilities as proposed, will minimize any impact to the Myersville community. The station is sited near the interstate and a water treatment facility, and across the road from the only other industrial site in the region. The site is large enough to accommodate the station facilities, existing screening vegetation, and any additional vegetative barriers that may be required to screen the entire facility from public view. The site is also feasible in terms of natural gas hydraulics, constructability, and reasonable access to the pipeline.

Commercial activity is already in existence on Milt Summers Road and along Route 17 on both sides of I-70. Operation of the proposed compressor station will not require a large workforce or truck deliveries, so it will not increase vehicular traffic in the

vicinity of the station. In and of itself, the presence of the compressor station will not attract new commercial or industrial development.

COMMENT SUMMARY 13-3: The property where the compressor station site is located is zoned Commercial with a Highway Employment Overlay, which includes special conditions. The compressor station is an industrial facility that will not create any such highway related commerce and, as such, is a violation of local and county zoning. (C147, C65, C167, C186, C188, C128, C182, C171, MSM25)

Response: DTI's understanding of the Town of Myersville overlay zoning districts, as explained by local officials, is that these zoning districts may be superimposed on other zoning districts to permit uses otherwise disallowed in a particular district or to impose supplemental restrictions on uses in the district. The HEO district may only be superimposed in the General Commercial zoning district. Therefore, the use is allowed, but must meet requirements and special conditions consistent with the Town of Myersville Comprehensive Plan and HEO district criteria. It is DTI's intent to fully comply with all the requirements of the Town of Myersville and Frederick County as necessary to receive local permits and construction authorization for the planned facility.

COMMENT SUMMARY 13-4: According to FERC representatives, DTI does not need to comply with local laws of the City of Myersville, Frederick County, or the state of Maryland to meet the standard of public convenience and necessity. (S2, C39, MSM49, MSM51)

Response: It is DTI's intent to fully comply with all the requirements of the Town of Myersville and Frederick County as necessary to receive local permits and construction authorization for the planned facility. While the FERC encourages cooperation between interstate pipelines and local authorities, this does not mean state and local agencies, through application of state and local laws, may prohibit or unreasonably delay the construction or operation of facilities approved by the FERC.

COMMENT SUMMARY 13-5: The proposed site is not an industrial site. It is not a developed commercial site. Draft Resource Report 8, Table 8.2-1, states that 0 acres of commercial/industrial acreage will be disturbed by construction, temporarily or permanently. (C180)

Response: The property that DTI proposes to use for the compressor station site is currently undeveloped land, which is reflected in the numbers reported in Table 8.2-1 of Resource Report 8 – Land Use.

COMMENT SUMMARY 13-6: DTI's proposed compressor station in Myersville is within a Maryland Rural Legacy Program Area, which was created to protect large contiguous tracts of the state's precious cultural and natural resources, including the local economy. (C65, C118, C4, C25, C31, C147, C164, C163, C186, C188, MSM23, MSM24, MSM33)

Response: The Maryland Rural Legacy Areas Program was created in 1997 to protect large, contiguous tracts of Maryland's cultural and natural resource lands through grants made to local applicants. The proposed Myersville facilities fall within the boundaries of the Mid-Maryland Frederick Rural Legacy Area that is bordered on the east by the South Mountain and includes an area extending south from U.S Route 40, north of Myersville, to Interstate 340 north of the Potomac River. The area is built on protecting two contiguous blocks of preserved land near Myersville and the historic village of Burkittsville, and includes Frederick County's most productive agricultural lands, such as dairy operations and livestock farms, to assure their protection and promotion of the resource based economy of the area.

The proposed site for the Myersville Compressor Station is zoned as general commercial, is not included as an easement or conservation area in the program, is not currently in use for dairy operations or livestock farms, and contains no cultural or historic resources or significant natural resources. Therefore, while the site falls within the boundaries of Rural Legacy Area, it is not a high priority tract for inclusion within this program. Because the station will be screened from public view, it will not alter the character of the landscape.

COMMENT SUMMARY 13-7: DTI's compressor station site is in close proximity to a Maryland State Agricultural Preservation Program Priority Preservation Area and the Installment Purchase Program/County Easements. These easements contain significant prime farmland, including two of the three best farmland soils in the county (Myersville and Fauquier loams). The proposed Myersville compressor station, as an industrial facility, would be in clear contradiction to these Maryland and Frederick County initiatives for these programs. (C118, C163, C167)

Response: Based on mapping prepared by the Frederick County Division of Planning, the Myersville facilities are located within a Priority Preservation Area, within a Rural Legacy Area Boundary, and are adjacent to Installment Purchase Program/County Easements. U.S. Department of Agriculture – Natural Resource Conservation Service (USDA-NRCS) mapping also identifies prime farmland soils at the Myersville Compressor Station site and along the Suction/Discharge pipelines.

With regard to the planning and preservation of rural and agricultural land uses in the vicinity of the Myersville Compressor Station and Suction/Discharge pipelines, Project-related impacts would be small. Approximately 7.7 acres of the 21-acre site would be permanently developed and the remainder of site would be left in a natural state consisting of open land and woodlands. This would be consistent with the preservation of rural conditions. The proposed Suction/Discharge pipelines, once installed, would not prohibit continued use of the land in agricultural production or livestock farming. Therefore, the goal of preserving the agricultural and rural landscape would not be significantly changed by the Project.

Prime farmland soils mapped by the USDA-NRCS at the proposed Myersville Compressor Station site include the Myersville Series. Approximately 2.03 acres of prime farmland soils would be permanently removed from agricultural production for operations of the Myersville Compressor Station. However, these soils are not currently used for agriculture. Prime farmland soils mapped by the USDA-NRCS along the proposed Myersville Suction/Discharge pipelines include the Highfield, Mt. Zion, and Myersville series. Approximately 2,092 linear feet of prime farmland soils, crossed by the Suction/Discharge pipelines, would be temporarily impacted during construction. Temporary soil impacts would be mitigated through topsoil segregation and best management practices included in the Plan and Procedures. Following construction, these soils would be returned to agriculture use and livestock production. In summary, permanent impacts to prime farmland soils in Maryland would be limited to an area of approximately 2.03 acres, and temporary impacts would be mitigated through the implementation of best management practices.

COMMENT SUMMARY 13-8: What is DTI's plan to assure a healthy buffer around the site? (C183, C171, MSM51)

Response: If, following a review of the results of the planned Winter 2012 Visual Analysis, it is determined that the natural vegetative screening around the proposed compressor station is not adequate during winter conditions, DTI will develop a supplemental screening plan to minimize visual impacts from public viewpoints.

COMMENT SUMMARY 13-9: DTI's compressor station will negatively impact the views from nearby parks including Washington Monument State Park, the Gambrill State Park, Greenbriar State Park, South Mountain State Park, and the Appalachian Trail. Visitation to the parks will be reduced once the compressor station is built thereby reducing revenue for the state and county and leading to layoffs. (C4, C31, S2, C65, C118, C119, C167, C174, C186, C188, MSM51)

Response: The nearest state parks identified to be in the general vicinity of the compressor station area include Washington Monument State Park, approximately 4.5 miles to the west, Greenbrier State Park, approximately 7 miles to the northwest, South Mountain State Park, approximately 8 miles to the northwest, Gambrill State Park, approximately 7.5 miles to the southeast and Gathland State Park which is located approximately 12 miles southwest of the compressor station area. The nearest point of the Appalachian Trail is approximately 4.5 miles to the west. The proposed compressor station facilities would not be visible at these distances.

DTI proposes to retain the majority of the natural vegetative barrier on the 21-acre site and add additional vegetative screening where necessary when developing the facility to help conceal the compressor station facilities from public view at locations which are directly adjacent to the site. An independent consultant performed an extensive visual modeling analysis to illustrate the minimal visual impact anticipated at various nearby public view-points surrounding the location. DTI plans to have the analysis updated by

the consultant during the winter of 2012 to include new photography and further modeling to simulate the effects of winter foliage drop. This is a necessary step to identify barrier areas on the property where natural vegetative screening may not be adequate enough during winter conditions to be effective and to plan for additional evergreen screening to be installed to minimize the visual impact from public viewpoints. Therefore, DTI does not believe the state parks and tourism would be impacted in any way by the proposed compressor station.

COMMENT SUMMARY 13-10: Disagree with screening assertion as winter views of the proposed siting have not been completed. Additionally there has not been enough study of visual impact from surrounding high points down to area. DTI should provide computer generated views from higher elevations Canada Hill Road across from the, Highway 70 coming over the crest of Braddock Mountain, Coming north on Route 17 from Middletown. (C180, C183)

Response: DTI plans to have the initial analysis updated by the independent consultant during the winter of 2012 to include new photography and further modeling to simulate the effects of winter foliage drop. This is a necessary step to identify barrier areas on the property where natural vegetative screening may not be adequate enough during winter conditions to be effective and to plan for additional evergreen screening to be installed to minimize the visual impact from public viewpoints.

COMMENT SUMMARY 13-11: The proposed compressor station will be in direct view from the Lucy School campus, and families will pass directly in front of the station driving both to and from school, marring the rural landscape in which our school is nestled. (C177)

Response: The Lucy School, located at 9117 Frostown Road, Middletown, Maryland, is 1.4 miles southeast of the proposed compressor station site (about 2 miles by road). Due to intervening topography, it would be impossible to view the station from the school.

DTI will retain the majority of the natural vegetative barrier on the 21-acre site and add additional vegetative screening where necessary when developing the station facilities to help conceal the compressor station facilities from public view at locations which are directly adjacent to the site. Based on the initial screening analyses already completed by DTI's independent consultant, the station will not be visible from Milt Summers Road, the most direct access roadway to the school from Myersville.

COMMENT SUMMARY 13-12: Project is close to a Boy Scout Camp. (C62)

Response: DTI assumes this refers to Troup 217, which meets at Burkittsville Road (Route 17) in Middletown, Maryland. This location is approximately 4.3 miles south of the proposed compressor station site (5.8 miles by road) and would not be affected by development of the site.

COMMENT SUMMARY 13-13: Will the improvements at the Tuscarora Meter Station include enlarging the existing site or increasing gas line pressure at the station? If so, how close will the enlarged facility be to the County's existing water transmission lines and will an increase in gas line pressure result in any greater risk or hazard to the County's water treatment plant and transmission lines? (G1, MSM49)

Response: The upgrades at the Tuscarora M&R facility include replacement of the indirect gas heater/boiler, replacement of the inlet gas filter-separator as well as modifications and upgrades to existing M&R equipment and controls. All upgrades will be completed within the fence line of the existing facility. The M&R facility will not be enlarged beyond the existing fence line at the site, and as such, will not impact the County's water transmission lines or water treatment plant.

The Allegheny Storage Project will not result in design or operating pressure changes at the Tuscarora Meter Station.

14.0 AIR

COMMENT SUMMARY 14-1: The proposed Myersville Compressor Station will emit harmful and toxic chemicals, including volatile organic compounds (VOCs). These chemicals will degrade the quality of the air and water, and adversely impact the residents of Myersville, including a school located approximately 1 mile from the proposed station. (C1, C4, C22, C30, C31, C42, C127, C145, C167C174, C186, C188, C193, S4, MSM16, MSM19, MSM23, MSM25, MSM29, MSM30, MSM46, MSM49, MSM50, MSM55)

Response: The proposed Myersville Compressor Station will combust clean-burning natural gas in a highly-efficient Solar Mars 100 combustion turbine. The combustion turbine utilizes state-of-the-art combustion technology to minimize production of VOCs, and will be equipped with an oxidation catalyst to destroy the majority of the VOCs before they exit the stack. The combustion turbine is equipped with a tall stack to assure that pollutants disperse thoroughly in the air. As can be seen in Tables 9A-1 and 9A-5 of Resource Report 9, VOC emission rates are very low.

COMMENT SUMMARY 14-2: The proposed Myersville Compressor Station will emit VOCs. People and livestock in the community will be exposed to the VOCs. The proposed Myersville Compressor Station should be equipped with filters so that VOCs will not pollute the local drinking water. The Lucy School does not use markers with VOCs for its white boards, and minimizes their use in new construction. (C32, C177, C180, MSM30, MSM46)

Response: As described in response to comment 14-1, the proposed Myersville Compressor Station will be designed to minimize VOC emissions and their impact. Station VOCs will be released through a tall stack with a hot, high-velocity exhaust, and will disperse rapidly in the environment. The station's combustion turbine will be equipped with an oxidation catalyst. A filter would be unnecessary and is not practicable.

It must be noted that VOCs released outdoors from a tall stack are not comparable to those released indoors. VOCs released outdoors from a tall stack disperse rapidly and break down in the atmosphere. VOCs released indoors can accumulate, resulting in elevated concentrations.

VOCs released to the air are broken down by chemical reactions in the atmosphere, and do not impact surface or groundwater. VOC contamination in groundwater is caused primarily by the release of petroleum products (e.g., gasoline and oil spills) into the environment.

COMMENT SUMMARY 14-3: Similarly sized stations produce over 5.5 tons of formaldehyde each year. (C176, MSM30)

Response: The proposed Myersville Compressor Station's estimated formaldehyde emissions are only 0.127 tons per year (tpy), assuming the maximum hourly VOC emission rate for a permit limit equivalent to 6,000 hours per year.

COMMENT SUMMARY 14-4: The commenter has made calculations showing that one compressor will produce in one year the particulate matter equal to 75,000 cars each driving of 12,000 miles a year. (C176)

Response: A summary of the particulate matter with an aerodynamic diameter less than 10 microns (PM_{10}) emissions in Frederick County, Maryland during 2002 (the most recent data) was downloaded from the USEPA's AirData database. AirData (http://www.epa.gov/air/data/dbstatus.html) provides air emissions data for point and non-point sources in the U.S. In 2002, the total PM_{10} emissions in Frederick County (year 2000 population of 195,277) were approximately 7,700 tpy, including 175 tpy from highway vehicles and 200 tpy from off-highway vehicles. By comparison, the proposed Myersville Compressor Station's estimated annual PM_{10} emissions are 2.73 tpy less than 1.6 percent of emissions from highway vehicles in the county. The commenter's calculations clearly do not apply to the proposed Myersville Compressor Station.

COMMENT SUMMARY 14-5: The emissions from the proposed Myersville Compressor Station would contribute to an increase of the ground-level ozone, thereby undermining the efforts by the USEPA, state, and local jurisdictions to reduce the ozone level. (C187)

Response: The proposed Myersville Compressor Station will not undermine efforts by the USEPA, state and local jurisdictions to reduce the ozone level. States must prepare and maintain State Implementation Plans (SIPs) that define the measures to achieve compliance with the federal air quality standards. USEPA reviews and approves SIPs. Frederick County is included in the ozone SIP for the Washington DC / Maryland / Virginia Region. MDE may not issue an air permit that conflicts with the SIP, and the FERC may not issue a Certificate to a project that conflicts with the SIP.

COMMENT SUMMARY 14-6: The commenter identified four specific concerns/questions: 1) Resource Report 9 Table 9.1-10 "Operational Emission Summary" shows the Myersville Compressor Station would emit 23.53 total tpy for NO_x. How are these calculated? 2) What is the margin for error in these measurements? 3) How will the emissions be monitored? By whom?; 4) What are the MDE view of this Project vis-à-vis current or anticipated future changes in Ozone Transport Region (OTR) and State emission standards? (C180, MSM49)

Response: 1) The annual NO_x emissions were calculated using the maximum hourly NO_x emission rate and a maximum limit equivalent to 6,000 hours per year. Both of these will become permit limits.

- 2) DTI has hired an independent consultant to conduct NO_x emission testing. Testing will be performed in accordance with a written protocol reviewed and approved by MDE using methods prescribed by the USEPA. Typically, three test runs are conducted, and the average of the three tests must be less than the permit limits. Between each test run, gas analyzers are calibrated using calibration gases with known NO_x concentrations, guaranteed accurate to \pm 1.0 percent.
- 3) DTI will monitor NO_x emissions in accordance with any permit issued for the station.
- 4) Relevant changes to regulations for the OTR must be incorporated into the SIP, and any new State emission standards must be consistent with the SIP. MDE may not issue a permit for the Myersville Compressor Station that is not in accordance with the SIP.

COMMENT SUMMARY 14-7: Explain why the oxidation catalyst system to control emissions of carbon monoxide (CO) will not control more than 80 percent of emissions. (C180)

Response: The control efficiency will be at least 80 percent, and may be greater. The level of 80 percent CO control represents a commercial guarantee. It includes a margin that will assure this level of performance over a range of operating conditions and accommodate degradation over time. It represents the state-of-the art, given space constraints and practical considerations.

COMMENT SUMMARY 14-8: The proposed Myersville Compressor Station will emit carcinogens. People, wildlife, and livestock in the community will be exposed to these carcinogens. (C57, C65, C147, C193, C195, MSM26)

Response: The station's combustion turbine will be equipped with an oxidation catalyst to control emissions of Hazardous Air Pollutants (HAPs), including carcinogens. As a result, there will be a lower emission rate per unit of fuel combusted than typical gas-burning facilities, such as furnaces and boilers. Under standards developed by the USEPA and the MDE to protect the public, the station will be classified as a minor source of HAPs.

Maryland has stringent air pollution regulations. If a facility's emissions of HAP exceed a de minimis amount, the facility must perform an assessment to demonstrate that the maximum exposed individual (i.e., a person living every day for 30 years at the location with the highest predicted concentration) would not have an increased lifetime cancer risk exceeding 1 in 100,000.

COMMENT SUMMARY 14-9: What impact do the emissions have on human health and the environmental problems associated with greenhouse gases? (C65)

Response: The proposed Myersville Compressor Station will burn natural gas, which has the lowest greenhouse gas (GHG) emissions per unit of energy of any fossil fuel. It has the potential to emit 47,409 tpy of CO_2e (based on annual fuel consumption for a maximum permit limit equivalent to 6,000 hours per year of full power operation), and will be classified as a minor source of GHG under state and federal rules. Natural gas is a cost-effective alternative to other fossil fuels (e.g., fuel oil), which produce more GHGs when combusted.

COMMENT SUMMARY 14-10: There is concern about the dispersion of air pollution and if pollutants from the proposed Myersville Compressor Station will concentrate in the valley where Myersville is located. A study of thermal inversion effects, including the site's topography and the emissions, should be conducted to assess impacts on wildlife, livestock, and people. Dispersion studies should measure and assess seasonal variations in existing air quality, proximity to major highways and seasonal variations in air quality from vehicular traffic, and should account for both the prevailing wind and winds in the direction of home and schools. (C46, C65, C164, C163, C167, C173, C180, C182, C192, S2, C185, C176, MSM13, MSM16, MSM17, MSM 33)

Response: A screening model (AERSCREEN) will be run in accordance with regulations and established protocols established by the MDE. The model results will be included in a report that will be part of the air permit application submitted to MDE.

COMMENT SUMMARY 14-11: The exhaust with water vapor will cool down in the surrounding area. During fall and spring this could enhance or cause local high dense fog next to I-70 and Route 17. This would result in sudden reduced (or no) visibility for drivers on these roads. In winter, this would contribute to black ice, resulting in extreme danger for motorists driving on I-70 and Route 17 and particularly for motorists on the bridge over I-70 which is the bus route for school children. (C167)

Response: Combustion turbine exhaust contains less than 10 percent by volume (6 percent by weight) water vapor. It is released at high temperature and high velocity through a tall stack. It will not cause fog on the nearby highway. DTI has not experienced problems with the formation of fog or black ice from compression exhaust at, or near, any of its compressor station facilities. It is noted that wet or evaporative

cooling tower exhaust may cause fogging in adverse conditions. The station will not use these types of cooling towers.

COMMENT SUMMARY 14-12: A simple response such as 'the government regulates emissions' is unacceptable given that there are several presidential candidates and members of Congress now calling for the elimination of the USEPA..." More detailed information is necessary regarding compliance with the Clean Air Act and emissions monitoring. Is compliance with relevant environmental laws required to meet the standard of public convenience and necessity? (C65, C183, S2, MSM49)

Response: DTI will monitor emissions from the proposed Myersville Compressor Station in accordance with any air permit issued by MDE. The permit will contain, directly or by reference, detailed operating and monitoring requirements, and will incorporate applicable CAA requirements. The process for issuing an air permit includes public notice and comment on the draft permit. An applicant must provide an estimate of the impact of a proposed project on air quality and describe how existing regulatory standards such as the CAA will be met to obtain a Certificate from the FERC.

COMMENT SUMMARY 14-13: Air quality testing every 5 years is not frequent enough. (C32, MSM23)

Response: DTI will monitor emissions from the proposed Myersville Compressor Station in accordance with any air permit issued by MDE. Under the regulations, the station is a minor air emission source. Third-party stack testing that is witnessed and approved by MDE will be performed when operation begins and every 5 years thereafter.

COMMENT SUMMARY 14-14: Will studies on air quality be conducted prior to construction to establish a baseline? (C195)

Response: Maryland and neighboring states operate air-monitoring networks in accordance with USEPA requirements, to measure the concentrations of pollutants in ambient air. These data establish the air quality baseline. Ambient air quality monitoring data from the 3-year period 2006-2008 are summarized in Resource Report 9 Table 9.1-7.

COMMENT SUMMARY 14-15: Did DTI comply with all federal and listed state emission limits as reflected in the USEPA's website (http://www.epa.gov/air/emissions/where.htm) that defines type of emissions (SO2, NOx, CO2, VOCs) for 2008? (C118, MSM16)

Response: The source cited is a nation-wide inventory of pollutant emissions, not a description of emission limits. DTI is committed to full compliance with all local, state, and federal laws that affect its operations.

COMMENT SUMMARY 14-16: Did DTI comply with all federal and Pennsylvania, Virginia, West Virginia, Maryland, New York and Ohio state DEP emissions from 2005 to 2011? (C118)

Response: DTI is committed to full compliance with all local, state, and federal laws that affect its operations.

COMMENT SUMMARY 14-17: Confirm DTI's compliance to industry standards such as the Standard B31.8S, Managing Integrity of Gas Pipelines, developed by the American Society of Mechanical Engineers in all of their compressor sites. (C118, C180)

Response: DTI is committed to comply fully with all standards required by law that affect its operations.

COMMENT SUMMARY 14-18: Will DTI comply to industry standards such as the Revised 1996 IPCC Guidelines for National Greenhouse Gas Inventories (IPCC Guidelines) Tier-3 source-specific emission assessments? (C180)

Response: DTI will record and report its GHG emissions as required by federal and state law.

COMMENT SUMMARY 14-19: Is DTI is a member of the Manufacturers of Emission Controls Association (MECA)? If so, confirm that it is in full compliance with the MECA recommendations for such things as such as the Ozone Transport Commission's proposed 2014 Model Rule for Control of NO_x Emissions from Natural Gas Pipeline Compressor Fuel-Fired Prime Mover. (C118)

Response: DTI does not manufacture emissions control equipment, and does not belong to MECA.

COMMENT SUMMARY 14-20: Confirm that DTI participates in the National-Scale Air Toxics Assessment (NATA) and uses NATA data. (C118)

Response: DTI is not a direct participant in NATA. USEPA developed the NATA as a comprehensive screening tool for air toxics for state, local, and Tribal regulatory agencies to prioritize pollutants, emission sources and locations of interest for further study in order to gain a better understanding of risks. NATA assessments do not incorporate refined information about emission sources. Data regarding DTI's operations are included in NATA to the extent that USEPA has decided to include these data.

COMMENT SUMMARY 14-21: Confirm that DTI uses USEPA's national database of air emissions that contains information on stationary sources that emit HAPs. (C118, C180)

Response: DTI is committed to comply fully with all state and federal laws regarding HAP emissions. The data contained in USEPA AirData and NATA are not relevant to or useful for ongoing compliance activities. The USEPA may choose to include data reported by DTI in its databases.

COMMENT SUMMARY 14-22: DTI should prepare risk assessments for all of its existing and proposed compressor stations, and provide parameters and dispersion models used for all of its risk assessments. (C118)

Response: Each state has its own regulations and/or standards for air toxics screening and risk assessment. DTI has complied with these standards and regulations, and will continue to do so. DTI has used USEPA models and approved methods for its dispersion analysis.

COMMENT SUMMARY 14-23: DTI should provide a safety analysis to compare its operations to the rest of the gas transmission industry. (C118)

Response: DTI is committed to comply fully with all applicable state and federal pipeline safety laws, and will prepare all safety analyses required by law.

COMMENT SUMMARY 14-24: DTI should provide detailed monitoring, controls and remediation tools to ensure there are no adverse health impacts to the citizens of Myersville. (C118)

Response: DTI will monitor emissions from the proposed Myersville Compressor Station in accordance with any air permit issued by MDE. The permit will contain detailed operating and monitoring requirements directly or by reference, and will incorporate applicable CAA requirements. The process for issuing an air permit includes public notice and comment on the draft permit.

COMMENT SUMMARY 14-25: DTI should: 1) report emission, including HAPs and GHGs from all of its natural gas compressor sites in Maryland, Pennsylvania, Virginia, Ohio, New York, and West Virginia for the past ten years, and 2) provide an independent assessment of all stack emissions from its U.S. natural gas compressor stations (broken down by site) of emissions and quantity of emissions. (C180, C118)

Response: DTI reports emissions from its operations in accordance with federal and state laws. Requests for past reports should be made to the individual state agencies.

COMMENT SUMMARY 14-26: DTI should provide a list of all DTI violations and fines over the past 10 years as reported to the USEPA, PHSMSA, OPS and Departments of Environmental Protection/Services for Pennsylvania, West Virginia, Virginia, Ohio, New York, and Maryland, as well as list of all settled and existing/pending law suits (including the summary briefs) against DTI over the past ten years. (C118, C180)

Response: DTI will provide all information required by federal, state, and local laws.

15.0 NOISE AND VIBRATION

COMMENT SUMMARY 15-1: Noise emitted from the proposed Myersville Compressor Station would affect nearby residents, schools, public health, quality of life, and wildlife. How will DTI comply with FERC's noise criteria of an L_{dn} of 55 dBA at the proposed Myersville Compressor Station? How will DTI monitor the noise for the proposed Myersville Compressor Station and are DTI's calculated impacts correct? (C1, C2, C3, C4, C15, C28, C27, C56, C65, C118, C119, C125, C126, C167, C176, C177, C182, C183, C185, C186, C188,S2, C189, C193, MSM16, MSM21, MSM25, MSM31, MSM45, MSM49)

Response: The preliminary noise analysis report indicated that the noise increases attributable to the proposed compressor station would be minimal. The facility will incorporate state-of-the-art noise mitigation equipment into the design in an effort to maintain a net-zero increase in the overall sound levels at all public noise sensitive areas, including residences. An independent noise consultant completed a final ambient noise study in November 2011, which confirms that, with noise mitigation measures built into the design, nearby residences will not experience any increase in current noise levels.

It should be noted that A-weighted decibels are based on a logarithmic scale. They cannot be added or subtracted in the usual arithmetical way. For example, if one source emits a sound level of 90 dB(A) and a second emits the same sound level, the resulting sound level is 93 dB(A), not 180 dB(A).

To ensure that the noise attributable to operation of the proposed Myersville Compressor Station at nearby nearest noise sensitive areas (NSAs) would not exceed an L_{dn} of 55 dBA, the FERC will require that DTI conduct a noise survey no later than 60 days after placing the authorized unit in service. If the noise at full load exceeds an L_{dn} of 55 dBA at the nearby NSAs, DTI must install additional noise controls to meet an L_{dn} of 55 dBA within 1 year of the in-service date and conduct a second noise survey to confirm compliance with the requirement. All noise surveys will be filed with the FERC.

COMMENT SUMMARY 15-2: Explain what studies have been conducted at the proposed Myersville Compressor Station site to determine potential noise impacts that could occur. (C176, C180, C182, C183).

Response: DTI's independent consultant conducted sound survey measurements in October 2011, and finalized the noise analyses report in November 2011. Sound survey measurements were conducted at the property lines of the proposed Myersville Compressor Station site and at each NSA during the daytime between 9 am and 1 pm and during the nighttime between 10 pm and midnight. Weather conditions during the daytime were clear to cloudy skies, southeast winds (1 to 10 miles per hour [mph]), with temperatures of 60° to 61°F and relative humidity ranging from 65 to 55 percent. At nighttime, weather conditions were partly cloudy to mostly clear, west winds (1 to 7 mph), with temperatures between 53° and 56°F and relative humidity 55 to 65 percent.

The station has been designed so that the continuous sound from the Solar Mars Model 100 turbine compressor unit operating at full rated load will not exceed the FERC day-night sound level (L_{dn}) of 55 dBA at the NSAs and the State of Maryland standards for environmental noise requirements of an L_{dn} of 55 dBA at residential property lines and an L_{dn} of 64 dBA at commercial property lines. The predicted sound levels are based on sound level information provided by the turbine manufacturer (Solar Turbines), and design specifications to minimize noise for the compressor station building, roof, and doors; air handling units, wall air inlet fans, lube oil cooler, turbine exhaust muffler, and turbine air intake cleaner/silencer. Predicted sound levels show no increase in noise levels at the NSAs with proposed station design.

A copy of the Noise Survey Report in available from the FERC's website in Appendix 9C of Resource Report 9.

COMMENT SUMMARY 15-3: Light pollution from the proposed Myersville Compressor Station is not acceptable. (C34)

Response: DTI plans to install a reasonable and effective lighting system for security and safety. All station lighting would be designed in compliance with local ordinances and county regulations. Lighting would only be utilized where necessary for operations. Typically, flat lens fixtures with high-pressure sodium bulbs directed downward toward the work areas would be utilized. This design would limit the potential illumination of areas outside of the fenced area.

COMMENT SUMMARY 15-4: Vibration and/or low frequency noise from the proposed Myersville Compressor Station could damage the structural integrity of the Route 17 Bridge over I-70 or the adjacent wastewater treatment plant. (C167, C182, 183, MSM25)

Response: Reciprocating type engines and compressors, particularly integral designed units (as opposed to skid mounted units), are more prone to low -frequency noise generation induced by vibration due to the block and basement configuration typical of their installation. Low-frequency induced vibration is not a major concern with skid-mounted industrial gas turbines as preventative mitigation measures are much easier to incorporate into the design. In fact, gas turbines are very sensitive to vibration and are equipped with vibration sensors to automatically shut down the turbine if even minor vibrations are detected.

Due to the close proximity of I-70, which currently contributes a far greater amount of noise and vibration to the local area than is predicted to be added by the compressor station facilities, it is not anticipated that the construction and operations of the compressor station would adversely impact the Route 17 bridge or the Myersville Wastewater Treatment Plant.

16.0 OTHER

COMMENT SUMMARY 16-1: The focus should be on the safe extraction and use of underground gas reserves and conservation, preservation, alternative energy, and public health. (C31)

Response: DTI's Allegheny Storage Project does not involve the extraction of underground gas reserves.

COMMENT SUMMARY 16-2: Who is responsible for clean-up and restoration of spills. (C65)

Response: DTI would construct, operate, and maintain the compressor station in compliance with all applicable federal and state permit requirements, regulations, and environmental guidelines. DTI would be responsible for clean-up and restoration of any area affected by a spill.

COMMENT SUMMARY 16-3: Why did DTI repair a pipeline gas leak at night and why was no one notified of the leak? (C167, MSM47)

Response: DTI has not experienced or repaired any gas leaks recently on the PL-1 pipeline system in this area. The most recent PL-1 pipeline work in the area either involved hydrostatic pressure testing of a pipeline segment to ensure the integrity of the pipeline system or pigging (e.g., inspection of the inside of the pipe) as required by the USDOT to validate the allowable operating pressure.

COMMENT SUMMARY 16-4: The proposed Myersville Compressor Station would impact groundwater in other areas of the Project including Maryland, Pennsylvania, and West Virginia where hydrofracturing is likely. (C188)

Response: DTI's Allegheny Storage Project does not involve hydrofracturing.

COMMENT SUMMARY 16-5: The compressor station would have gas fumes similar to the odors smelled at the Chambersburg compressor station in Pennsylvania. (C58)

Response: DTI does not plan to inject an odorant as part of station operation.

COMMENT SUMMARY 16-6: Commenters oppose the Allegheny Storage Project in general or because it would not bring gas to the town and would degrade the community. (C19, C26, C35, C44, C48, C53, C58, C74, C117, C122, C124, C129, C146, C170, MSM30, MSM32, MSM40, MSM44)

Response: Comment noted.

COMMENT SUMMARY 16-7: Commenters support construction and operation of the Allegheny Storage Project. (C64, C121, C171, C184).

Response: Comment noted.

COMMENT SUMMARY 16-8: Will the improvements at the Tuscarora Meter Station include any changes to or new sacrificial or impressed cathodic corrosion control systems used for the gas line? If so these improvements or changes need to be reviewed by the County to verify that such changes will not impact the County's water transmission system assets near the DTI transmission lines and/or the meter station. (G1)

Response: Upgrades at the Tuscarora M&R include replacement of the indirect gas heater/boiler, replacement of the inlet gas filter-separator as well as modifications and upgrades to existing M&R equipment and controls. DTI will complete these upgrades within the fence line of the existing facility. No changes or new cathodic corrosion control systems are planned. DTI will coordinate with the County to ensure that there will be no impacts on the County's water transmission system.

17.0 COMMENTS REGARDING OTHER PROJECT FACILITIES

COMMENT SUMMARY 17-1: Mullett Compressor Station and Suction/Discharge pipelines. Heavy equipment used to construct the REX pipeline and facility adjacent to the existing Mullett M&Rs damaged local roadways, specifically Township Road 516. No funding to repair this road has been received after it was used for two years to move construction workers to the site. (C196)

Response: DTI will obtain a maintenance agreement, road occupancy permit and other approvals as required by the County to utilize the local town road system during construction of its proposed facilities. As part of the maintenance agreement, DTI will work with the Town to repair any damage to the roads resulting from construction traffic. DTI will also make all necessary road repairs to the satisfaction of the County after construction is completed.

COMMENT SUMMARY 17-2: Mullett Compressor Station and Suction/Discharge pipelines. Previous changes at the existing site completed two years ago as part of REX have resulted in detrimental changes in the noise levels that can be heard 1 to 2 miles away. The proposed facilities should be totally enclosed in a sound proof building or relocated to a riverfront industrial site. (C196, PSM1)

Response: The reciprocating engine/compressor at the proposed Mullett Compressor Station will be enclosed in an acoustically designed building with the following noise controls:

• Acoustically treated compressor building;

- Muffler on the exhaust and a filter/silencer on the air intake;
- Adequate cooling to allow full load operation of the reciprocating engine compressor unit with all doors closed;
- Limitations on maximum noise from the jacket and auxiliary water cooler and the gas cooler when running at full speed; and
- Limitations on the maximum A-weighted sound level from the unit blowdown starter air vent and fuel gas vent.

With implementation of these measures, future sound levels associated with operation of the Mullett Compressor Station are predicted to be below an L_{dn} of 55 dBA at all nearby residences. A noise survey will be completed within 60 days after placing the station in service to verify that noise attributable to the operation of all equipment at full load does not exceed an L_{dn} of 55 dBA at nearby residences. If that level is exceeded, DTI will install additional noise controls to meet that level within 1 year of the in-service date and will complete a second noise survey to confirm the requirement has been met.

Modifications to the Mullett 1 M&R Station will not involve equipment that would result in an increase in noise levels in that area. DTI is not responsible for noise associated with operation of the REX facilities.

COMMENT SUMMARY 17-3: Mullett Compressor Station and Suction/Discharge pipelines. Fills or earth disturbances within a river, stream, wetland, or other water would require authorization under Section 10 of the Rivers and Harbors Act and Section 404 of the CWA. Every effort should be made to avoid and minimize river, stream, wetland or other water impacts to the fullest extent practicable. If wetlands are found, they should be accurately delineated. (F1)

Response: DTI has completed wetland and waterbody delineations at all of the Project sites. These survey reports will be included as part of wetland and waterbody permit applications filed with federal and state agencies. DTI has planned the location of its facilities to avoid and minimize impacts on wetland and waterbodies to the fullest extent practicable.

COMMENT SUMMARY 17-4: Sabinsville Storage Station and Sabinsville Replacement pipelines. The Pennsylvania DCNR has reviewed its records for potential impacts to species and resources of concern under DCNR's responsibility and has determined that no impact on these resources is likely. (S1)

Response: Comment noted.

COMMENT SUMMARY 17-5: Allegheny Storage Project. The National Park Service does not have comments at this time on the Allegheny Storage Project. (F2).

Response: Comment noted.

18.0 REFERENCES

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- Brezinkski, D.K., Reger, J.P., and Baum, G.R., 2003. Geologic Mapping as a Basis for Sinkhole Susceptibility Prediction, Frederick Valley, Maryland: http://www.mgs.md.gov/geo/pub/geomapsinkh.pdf.
- Brezinkski, D.K., 2009. Karst Features of the Myersville Quadrangle and Maryland portion of the Smithsburg Quadrangle, Washington and Frederick Counties, Maryland: Maryland Geological Survey, MY_SMKST2009_1, scale 1:24,000.
- Frederick County Traffic Volume Map. 2010. Last accessed December 2011. http://frederickcountymd.gov/index.aspx?NID=3083
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- U.S. Energy Information Administration. 2011.
- USEPA. 2011b. Pennsylvania Superfund Sites. Accessed online in September 2011 at: http://www.epa.gov/reg3hwmd/super/pa.htm.
- USEPA. 2011c. Maryland Superfund Sites. Accessed online in September 2011 at: http://www.epa.gov/reg3hwmd/super/md.htm.
- USEPA. 2011d. Ohio Superfund Sites. Accessed online in September 2011 at: http://www.epa.gov/region5superfund/.

APPENDIX A

LIST OF COMMENTERS ALLEGHENY STORAGE PROJECT Docket No. PF11-9

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
MSM51-1	11/7/2011	Bill Adamo Middletown, MD	
C75A-43 ³	10/26/2011	William J. Adamo Middletown, MD	Form Letter
C142	11/15/2011	Bethony A. Adamo Middletown, MD	Form Letter
C144A-42 ³	10/31/2011	Timothy M. Adamo Middletown, MD	Form Letter
C62A-93 ³	11/14/2011	Brittany Adams Myersville, MD	Form Letter
C62A-94 ³	11/14/2011	Kimberly Adams Myersville, MD	Form Letter
C75A-21 ³	10/26/2011	Piers Ady Myersville, MD	Form Letter
C75A-22 ³	10/26/2011	Janet Ady Myersville, MD	Form Letter
C62A-140 ³	11/14/2011	Stephen & Susan Aleksejus Myersville, MD	Form Letter
MSM53-1	11/7/2011	Kristin Aleshire, Town Manager Myersville, MD	
C102A-15 ³	10/31/2011	Gregory & Nena Allerato Myersville, MD	Form Letter
C63	10/31/2011	Antietam Compliance Company Fredric Sevin, Owner & President Myersville, MD	
C64A-18 ³	10/31/111	Antietam Compliance Company Fredric Sevin, President Myersville, MD	Form Letter
C64A-23 ³	10/31/111	Antietam Compliance Company Peter Jolles, VP Industrial Sales Myersville, MD	Form Letter
C62A-106 ³	11/14/2011	James Allen Arney Myersville, MD	Form Letter
C75A-50 ³	10/26/2011	Forugh Assemi Middletown, MD	Form Letter
C113A-40 ³	10/26/2011	Arya Assemi Middletown, MD	Form Letter
C113A-24 ³	10/26/2011	Yvonne Atwood Myersville, MD	Form Letter
C113A-25 ³	10/26/2011	Alan Atwood Myersville, MD	Form Letter
C39	11/8/2011	Jack Bacorn	
C113A-61 ³	10/26/2011	Jack Bacorn Myersville, MD	Form Letter
MSM55-1	11/7/2011	Jack Bacorn Myersville, MD	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-114 ³	11/14/2011	Dawn Bailer Myersville, MD	Form Letter
C62A-115 ³	11/14/2011	Joe Bailer Myersville, MD	Form Letter
C113A-37 ³	10/26/2011	James A. Baisey Myersville, MD	Form Letter
C113A-38 ³	10/26/2011	Sandra Baisey Myersville, MD	Form Letter
C62A-105 ³	11/14/2011	Erin & Andrew Baker Myersville, MD	Form Letter
C62A-167 ³	11/14/2011	LeRoy & Clara Mae Baker Myersville, MD	Form Letter
C75A-15 ³	10/26/2011	Kevin L. Baker Myersville, MD	Form Letter
C62A-125 ³	11/14/2011	Danielle Bamberg-Dewein Myersville, MD	Form Letter
C144A-38 ³	10/31/2011	Sara D. Barnhart Myersville, MD	Form Letter
C62A-149 ³	11/14/2011	David Barrow Myersville, MD	Form Letter
C62A-150 ³	11/14/2011	Jan Barrow Myersville, MD	Form Letter
S2	11/7/2011	Roscoe G. Bartlett, Member of Congress U.S. House of Representatives	
C62A-160 ³	11/14/2011	Robert Bartoli Myersville, MD	Form Letter
C62A-161 ³	11/14/2011	Jean Bartoli Myersville, MD	Form Letter
C62A-56 ³	11/14/2011	Donald P. Bauer Middletown, MD	Form Letter
C75A-28 ³	10/26/2011	Kerry Beard Myersville, MD	Form Letter
C75A-33 ³	10/26/2011	Brian J. Beard Myersville, MD	Form Letter
C62A-165 ³	11/14/2011	Dianna Berkey Myersville, MD	Form Letter
C62A-166 ³	11/14/2011	Robert Berkey Myersville, MD	Form Letter
C186	11/23/2011	Jennifer Bertulaitis Myersville, MD	
C113A-16 ³	10/26/2011	Jennifer Bidle Myersville, MD	Form Letter
C113A-29 ³	10/26/2011	Zach Bidle Myersville, MD	Form Letter
C75A-39 ³	10/26/2011	Mark Billadeau Middletown, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C75A-45 ³	10/26/2011	Renee Billadeau Middletown, MD	Form Letter
MSM45-1	11/7/2011	Mark Billadeau Myersville, MD	
C180	11/22/2011	Margie Binzer Myersville, MD	
MSM7-1	11/7/2011	Margie Binzer Myersville, MD	
MSM31-1	11/7/2011	Margie Binzer Myersville, MD	
C70	10/31/2011	Beth Bittle Myersville, MD	Form Letter
C72	10/31/2011	Alvin Bittle Myersville, MD	Form Letter
C1	10/26/2011	Susan L. Blair Myersville, MD 21773-8430	
C6	10/25/2011	Andrew J. Blair Myersville, MD 21773-8430	Form Letter
C11	10/27/2011	Nicholas J. Blair Myersville, MD 21773-8430	
C12	10/25/2011	Nicholas J. Blair Myersville, MD 21773-8430	Form Letter
MSM50-1	11/7/2011	Nick Blair Myersville, MD	
C62A-5	11/14/2011	Therese Blanchon Myersville, MD	Form Letter
C49A-26	11/10/2011	Richard L. Blickenstaff Myersville, MD	Form Letter
C144A-57	10/31/2011	Carol Blimline & Virginia Nuessle Middletown, MD	Form Letter
C113A-56	10/26/2011	Anton Blumberg Myersville, MD	Form Letter
C113A-52	10/26/2011	Julia Boffemmyer Myersville, MD	Form Letter
C113A-53	10/26/2011	Stephen Boffemmyer Myersville, MD	Form Letter
C49A-28	11/10/2011	Kristin W. Borcherding Middletown, MD	Form Letter
C49A-29	11/10/2011	Breck Borcherding, MD Middletown, MD	Form Letter
C62A-129	11/14/2011	James A. Boudort Myersville, MD	Form Letter
C62A-20	11/14/2011	Sean Bowman Middletown, MD	Form Letter
C144A-51	10/31/2011	Helen T. Brandenburg Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-54 ³	10/31/2011	Sharon Bremer Myersville, MD	Form Letter
C68	10/31/2011	Carol Brumback Middletown, MD	Form Letter
C75A-18 ³	10/26/2011	Travis Bruno Myersville, MD	Form Letter
C113A-78 ³	10/26/2011	Kristi Buckalew Myersville, MD	Form Letter
C113A-79 ³	10/26/2011	David Buckalew Myersville, MD	Form Letter
C64A-3 ³	10/31/111	Stephanie Burgess Myersville, MD	Form Letter
C144A-1 ³	10/31/2011	Gerald P. Burgess Myersville, MD	Form Letter
C61	11/14/2011	Ashley Burgherr	
C62A-81 ³	11/14/2011	Kevin P. Burke Myersville, MD	Form Letter
C62A-178 ³	11/14/2011	Brenda S. Knox Burkett David E. Burkett & Dustin Knox Myersville, MD	Form Letter
C75A-11 ³	10/26/2011	Lem Burnett Myersville, MD	Form Letter
C182	11/23/2011	Debbie Burns Myersville, MD	
C7	10/25/2011	Darlene M. Burrier Myersville, MD 21773-0094	Form Letter
C8	10/25/2011	William G. Burrier Myersville, MD 21773-0094	Form Letter
C102A-8 ³	10/31/2011	Debra Bussard Myersville, MD	Form Letter
C102A-9 ³	10/31/2011	Katie Bussard Myersville, MD	Form Letter
C102A-12 ³	10/31/2011	Chris Bustamante Myersville, MD	Form Letter
C102A-13 ³	10/31/2011	Cassandra Bustamante Myersville, MD	Form Letter
C58	11/12/2011	Robert & Martha Butts Myersville, MD	
C113A-71 ³	10/26/2011	Martha J. Butts Myersville, MD	Form Letter
C113A-72 ³	10/26/2011	Robert P. Butts Myersville, MD	Form Letter
C118	11/17/2011	Ted Cady Myersville, MD	
MSM16-1	11/7/2011	Ted Cady Myersville, MD	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C57	11/13/2011	Riley Carpenter	
C62A-6 ³	11/14/2011	Tereza A. Carpenter Myersville, MD	Form Letter
C62A-31 ³	11/14/2011	Scott Carpenter Myersville, MD	Form Letter
MSM29-1	11/7/2011	Nicholas Carras Myersville, MD	
C49A-25 ³	11/10/2011	Kevin Cgnasiak Myersville, MD	Form Letter
C35	11/7/2011	Steve Chambers	
C62A-8 ³	11/14/2011	Henry V. Chase Myersville, MD	Form Letter
C62A-152 ³	11/14/2011	RM & Helene S. Christensen Myersville, MD	Form Letter
C190	11/23/2011	Nancy Chu Myersville, MD	
C62A-122 ³	11/14/2011	Tamarah R. Clark Myersville, MD	Form Letter
C62A-123 ³	11/14/2011	Christopher S. Clark Myersville, MD	Form Letter
C165	11/21/2011	Helen Clark Myersville, MD	
C166	11/21/2011	Helen Clark Myersville, MD	
MSM20-1	11/7/2011	Tammy Clark Myersville, MD	
MSM21-1	11/7/2011	Helen Clark Myersville, MD	
MSM32-1	11/7/2011	Nikki Cline Myersville, MD	
MSM34-1	11/7/2011	Gary Cline Myersville, MD	
C62A-180 ³	11/14/2011	Leroy H. Clopper Myersville, MD	Form Letter
C62A-151 ³	11/14/2011	Robert Cole Myersville, MD	Form Letter
C102A-11 ³	10/31/2011	Kimberly Collins Myersville, MD	Form Letter
C62A-77 ³	11/14/2011	Michael J. Colony Myersville, MD	Form Letter
C77	10/26/2011	Sherry Colony Myersville, MD	Form Letter
C102A-6 ³	10/31/2011	John C. Conway Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-9 ³	11/14/2011	Patricia Coppolella Myersville, MD	Form Letter
C75A-4 ³	10/26/2011	Terry Corellis Myersville, MD	Form Letter
C113A-73 ³	10/26/2011	Lynda Craig Myersville, MD	Form Letter
C189	11/23/2011	Carol Crandall Myersville, MD	
C41	11/9/2011	Tim Cross	
C109	10/26/2011	Gail M. & Richard Cust, Jr. Myersville, MD	Form Letter
C113A-11 ³	10/26/2011	Jordan Dagenhart Myersville, MD	Form Letter
C113A-12 ³	10/26/2011	Justin Dagenhart Myersville, MD	Form Letter
C113A-13 ³	10/26/2011	Julie Dagenhart Myersville, MD	Form Letter
C113A-14 ³	10/26/2011	Jason Dagenhart Myersville, MD	Form Letter
C113A-30 ³	10/26/2011	Joseph C. Dagenhart Myersville, MD	Form Letter
C45	10/31/2011	Ray Daugherty Myersville, MD	Form Letter
C62A-109 ³	11/14/2011	Paul & Maura David Myersville, MD	Form Letter
C64A-33 ³	10/31/111	Michael E. Deitrich Myersville, MD	Form Letter
C64A-34 ³	10/31/111	Sherry Deitrich Myersville, MD	Form Letter
C113A-77 ³	10/26/2011	Carrie DeLauter Middletown, MD	Form Letter
C22	11/4/2011	Michael Dellospidale	
C62A-76 ³	11/14/2011	Danelle F. DeLoach Myersville, MD	Form Letter
C62A-121 ³	11/14/2011	Stephen R. DeLoach Myersville, MD	Form Letter
C62A-181 ³	11/14/2011	Kate DeLoach Myersville, MD	Form Letter
C62A-124 ³	11/14/2011	Deanna Delvein Myersville, MD	Form Letter
C172	11/22/2011	Susan Derse	
C144A-26 ³	10/31/2011	Michael Devine Middletown, MD	Form Letter
MSM40-1	11/7/2011	Frances DeVine Myersville, MD	
MSM41-1	11/7/2011	Edmund Devine	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
		Myersville, MD	
C136	10/26/2011	Matthew & Ashley Dicks Myersville, MD	Form Letter
C2	10/27/2011	Tim Doreen	
C75A-37 ³	10/26/2011	Ellen Doreen Middletown, MD	Form Letter
C75A-38 ³	10/26/2011	Timoty F. Doreen, Jr. Middletown, MD	Form Letter
C62A-36 ³	11/14/2011	Florence R. Doyle Myersville, MD	Form Letter
C62A-100 ³	11/14/2011	Diane C. Doyle Myersville, MD	Form Letter
C62A-148 ³	11/14/2011	Aleks Dragjc Myersville, MD	Form Letter
C62A-119 ³	11/14/2011	Daniel & Kimberly Dubie Myersville, MD	Form Letter
C62A-103 ³	11/14/2011	Paula Duva Middletown, MD	Form Letter
C62A-104 ³	11/14/2011	Larry Duva Middletown, MD	Form Letter
MSM52-1	11/7/2011	Brad Dyjak, Town Planner Myersville, MD	
C113A-8 ³	10/26/2011	Kathleen Dyson Middletown, MD	Form Letter
C49A-30 ³	11/10/2011	E. Quentin Grossnickle & Sons (Fay E. Miller) Myersville, MD	Form Letter
C62A-54 ³	11/14/2011	Dorothy S. B. Early Myersville, MD	Form Letter
C161	10/31/2011	Margaret J. Eisenhower Myersville, MD	Form Letter
C162	10/31/2011	John Barry Eisenhower Myersville, MD	Form Letter
C62A-79 ³	11/14/2011	Elite Construction Evan D. Leatherman, Owner Myersville, MD	Form Letter
C62A-24 ³	11/14/2011	Elizabeth Elliott Myersville, MD	Form Letter
C49A-33 ³	11/10/2011	Pamez Emell Myersville, MD	Form Letter
C62A-110 ³	11/14/2011	Christine Emery Myersville, MD	Form Letter
C64A-16 ³	10/31/111	Tom & Diane Evich Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C139	10/26/2011	Angelique Fallahi Myersville, MD	Form Letter
C140	10/26/2011	Payam Fallahi Myersville, MD	Form Letter
C62A-159 ³	11/14/2011	Michael Faron Myersville, MD	Form Letter
C62A-173 ³	11/14/2011	Frank Filon & Ellen Filon Myersville, MD	Form Letter
C62A-74 ³	11/14/2011	Donald T. Fine Middletown, MD	Form Letter
C62A-75 ³	11/14/2011	Ruby Fine Middletown, MD	Form Letter
C151	10/31/2011	Lea & Maurizio Flaim Myersville, MD	Form Letter
C62A-57 ³	11/14/2011	Gary Flohr Middletown, MD	Form Letter
C62A-26 ³	11/14/2011	Tessa M. Flook Middletown, MD	Form Letter
C62A-27 ³	11/14/2011	Nicole Flook Middletown, MD	Form Letter
C64A-28 ³	10/31/111	Tina Flook Myersville, MD	Form Letter
C102A-14 ³	10/31/2011	Mary E. Flook Myersville, MD	Form Letter
C113A-31 ³	10/26/2011	Angelina J. Fogle Myersville, MD	Form Letter
C125	11/20/2011	Jim Fogle Myersville, MD	
MSM42-1	11/7/2011	Jim Fogle Myersville, MD	
C64A-29 ³	10/31/111	Tara & Thomas Fogle, Jr. Myersville, MD	Form Letter
C75A-41 ³	10/26/2011	Thomas Dwight Foley Myersville, MD	Form Letter
PSM1-1	11/7/2011	Dale Forney	
C148	10/31/2011	Bridgitte Fortin Myersville, MD	Form Letter
C188	11/23/2011	Brigitte Fortin Myersville	
C144A-2 ³	10/31/2011	Joanne L. Fortune Myersville, MD	Form Letter
C49A-21 ³	11/10/2011	John Foster Myersville, MD	Form Letter
G1	11/22/2011	Frederick County Board of County Commissioners Blaine R. Young, President	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C83	10/26/2011	Don Frisby Myersville, MD	Form Letter
C97	10/31/2011	Danita Frisby Myersville, MD	Form Letter
C144A-6 ³	10/31/2011	Jeremy Frufhour Myersville, MD	Form Letter
C62A-82 ³	11/14/2011	Boyd H. Funk Plb. Inc. Boyd H. Funk Myersville, MD	Form Letter
C62A-83 ³	11/14/2011	Jean E. Funk Myersville, MD	Form Letter
C87	10/31/2011	Joyce A. Galbraith Myersville, MD	Form Letter
C113A-33 ³	10/26/2011	Jason Galey Myersville, MD	Form Letter
C113A-35 ³	10/26/2011	Marcia K. Galey Myersville, MD	Form Letter
C144A-21 ³	10/31/2011	Zachary Ganther Myersville, MD	Form Letter
C62A-3 ³	11/14/2011	Mrs. Marilyn Gaver Myersville, MD	Form Letter
C62A-99 ³	11/14/2011	Mary Ann Gearinger Frederick, MD	Form Letter
C49A-9 ³	11/10/2011	Scott A. George Myersville, MD	Form Letter
C167	11/21/2011	Franz Gerner Myersville, MD	
C168	11/21/2011	Iwona M. Gerner Myersville, MD	Form Letter
C169	11/21/2011	Marianne Gerner Myersville, MD	Form Letter
C187	11/23/2011	Franz M. Gerner	
C174	11/18/2011	Kathy & Jay Gill	
C75A-12 ³	10/26/2011	Deborah L. Gilles Myersville, MD	Form Letter
C75A-42 ³	10/26/2011	Gloria Gilligan Myersville, MD	Form Letter
C62A-101 ³	11/14/2011	Kristin Ginebra Myersville, MD	Form Letter
C62A-102 ³	11/14/2011	Nelson Ginebra Myersville, MD	Form Letter
C16	10/25/2011	Tyrone Glascoe Myersville, MD 21773	Form Letter
C108	10/26/2011	Gary & Margaret Glessner Myersville, MD	Form Letter
C75A-49 ³	10/26/2011	Fereshteh Gould	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
		Myersville, MD	
C181	11/22/2011	Fereshteh Gould Myersville, MD	Form Letter
C62A-164 ³	11/14/2011	Merle R. & Doris E. Graver Myersville, MD	Form Letter
C144A-20 ³	10/31/2011	Travis Lee Green Myersville, MD	Form Letter
C113A-57 ³	10/26/2011	Kathleen Grife Myersville, MD	Form Letter
C80	10/26/2011	Wallace Grimes Myersville, MD	Form Letter
C102A-1 ³	10/31/2011	Tara Grimes Myersville, MD	Form Letter
C62A-10 ³	11/14/2011	Wayne & Karen Grossnickle Myersville, MD	Form Letter
C62A-51 ³	11/14/2011	Lexi Grossnickle Myersville, MD	Form Letter
C62A-52 ³	11/14/2011	Donald Grossnickle Myersville, MD	Form Letter
C62A-53 ³	11/14/2011	Donne Lee Grossnickle Myersville, MD	Form Letter
C62A-92 ³	11/14/2011	David Grossnickle Myersville, MD	Form Letter
C62A-95 ³	11/14/2011	Ashley Grossnickle Myersville, MD	Form Letter
C73	10/31/2011	Mary Anne Grossnickle Middletown, MD	Form Letter
C62A-40 ³	11/14/2011	Carla Gue Myersville, MD	Form Letter
C75A-14 ³	10/26/2011	Connie Guy Myersville, MD	Form Letter
C113A-42 ³	10/26/2011	Della R. Hager Myersville, MD	Form Letter
C62A-70 ³	11/14/2011	James & Cathy Haines Myersville, MD	Form Letter
C64A-30 ³	10/26/2011	Michelle Hall Myersville, MD	Form Letter
C64A-31 ³	10/31/111	Kerry Hall Myersville, MD	Form Letter
C171	11/22/2011	Edward Hallen	
C53	11/11/2011	Andrew Hammond Frederick, MD	
C113A-1 ³	10/26/2011	Tracy Hammond Myersville, MD	Form Letter
C113A-69 ³	10/26/2011	Ron Hammond Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
MSM49-1	11/7/2011	Eric Hansen Myersville, MD	
C75A-6 ³	10/26/2011	Eric Hanson Myersville, MD	Form Letter
C185	11/23/2011	Eric Hanson	
C133	10/26/2011	Terry Harosky Middletown, MD	Form Letter
C62A-162 ³	11/14/2011	Jacob W. Harper Myersville, MD	Form Letter
C89	10/31/2011	Donald Harrington Myersville, MD	Form Letter
C90	10/31/2011	Tammy Harrington Myersville, MD	Form Letter
C62A-7 ³	11/14/2011	Dara Harris & Greg Stine Myersville, MD	Form Letter
C110	10/26/2011	Harry & Nancy Harris Myersville, MD	Form Letter
MSM48-1	11/7/2011	Stephen Hartten Myersville, MD	
C102A-2 ³	10/31/2011	Meredith C. Harshman Myersville, MD	Form Letter
C55	11/14/2011	Stephen Hartten Myersville, MD	
C62A-145 ³	11/14/2011	Ken, Mila & Wesley Haynes Myersville, MD	Form Letter
C119	11/18/2011	Mila, Ken & Wesley Haynes Myersville, MD	
C62A-117 ³	11/14/2011	Russell M. Headley Myersville, MD	Form Letter
C62A-118 ³	11/14/2011	Kelly Howell Headley Myersville, MD	Form Letter
C130	10/26/2011	Ben & Mean Heinrich Myersville, MD	Form Letter
C75A-23 ³	10/26/2011	Dorothy A. Heinsohn Myersville, MD	Form Letter
C75A-24 ³	10/26/2011	Bernard J. Heinsohn Myersville, MD	Form Letter
C147	11/17/2011	Gerhard J. Heinsohn Myersville, MD	
C191	11/21/2011	Gerhard J. & Dorothy A. Heinsohn Myersville, MD	
MSM23-1	11/7/2011	Dorothy Heinsohn Myersville, MD	
MSM24-1	11/7/2011	Gerard Heinsohn Myersville, MD	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C137	10/26/2011	Roy & Jill Henderson Middletown, MD	Form Letter
C64A-24 ³	10/31/111	Marlene Z., Julia E, Craig A. & Bruce H. Henry Myersville, MD	Form Letter
C49A-22 ³	11/10/2011	Gary R. Herbot Myersville, MD	Form Letter
C149	10/31/2011	Steve & Rine Higgs Myersville, MD	Form Letter
C64A-1 ³	10/31/111	Heather Hinkle Myersville, MD	
C67	10/31/2011	Susan Hitner Myersville, MD	Form Letter
C113A-63 ³	10/26/2011	Kathleen Hodson Myersville, MD	Form Letter
C62A-155 ³	11/14/2011	Carolyn E. Hollingsworth Myersville, MD	Form Letter
C75A-7 ³	10/26/2011	William F. Holloway Myersville, MD	Form Letter
C175	10/31/2011	Samantha L. Holt	Form Letter
C62A-60 ³	11/14/2011	Scot E. Hopkins Myersville, MD	Form Letter
C102A-10 ³	10/31/2011	Mark Hopkins Myersville, MD	Form Letter
C75A-10 ³	10/26/2011	Biran Hornbeck Myersville, MD	Form Letter
C75A-19 ³	10/26/2011	Loretta Hornbeck Myersville, MD	Form Letter
C50	11/10/2011	Douglas Howell Myersville, MD	
C64A-8 ³	10/26/2011	Kim & Doug Howell Myersville, MD	Form Letter
C43	11/9/2011	Michael Huston Myersville, MD	
C113A-64 ³	10/26/2011	Gracie Ignasiak Myersville, MD	Form Letter
C176	11/22/2011	Matt Isleib Myersville, MD	
C177	11/22/2011	Christine Isleib Myersville, MD	
C62A-126 ³	11/14/2011	Kimberly James Myersville, MD	Form Letter
C62A-127 ³	11/14/2011	Madolyn Bunny James Myersville, MD	Form Letter
C62A-128 ³	11/14/2011	Bell James Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C75A-17 ³	10/26/2011	Melvin E. Jenkins Myersville, MD	Form Letter
C126	11/20/2011	Ted Jenkins Myersville, MD	
C127	11/20/2011	Ted Jenkins Myersville, MD	
MSM1-1	11/7/2011	Ted Jenkins Myersville, MD	
C23	11/4/2011	Grayson Johnson Myersville, MD	
C25	11/4/2011	Gary Johnson Myersville, MD	
C48	11/10/2011	Jesse Johnson	
C62A-157 ³	11/14/2011	Beth Johnson Myersville, MD	Form Letter
C62A-158 ³	11/14/2011	Andy Johnson Myersville, MD	Form Letter
C74	11/16/2011	Jacob Johnson	
C113A-45 ³	10/26/2011	Donna Johnson Myersville, MD	Form Letter
C144A-10 ³	10/31/2011	Beverly Johnson Myersville, MD	Form Letter
MSM13-1	11/7/2011	Grayson Johnson Myersville, MD	
C62A-14 ³	11/14/2011	James H. Johnson, Jr. Middletown, MD	Form Letter
C144A-9 ³	10/31/2011	William A. Johnson, MD Myersville, MD	Form Letter
C64A-20 ³	10/31/111	Peter Jolles Myersville, MD	Form Letter
C95	10/31/2011	Richard E. Jordan Myersville, MD	Form Letter
C66	10/31/2011	Carl Jouannet Myersville, MD	Form Letter
C75A-3 ³	10/26/2011	Pamela Jouannet Myersville, MD	Form Letter
C29	11/5/2011	Kate Myersville, MD	
C153	10/31/2011	Wayne F. Kaufman Middletown, MD	Form Letter
C154	10/31/2011	Ruth A. Kaufman Middletown, MD	Form Letter
C75A-44 ³	10/26/2011	Mrs. Carol A. Keenan Myersville, MD	Form Letter
C144A-45 ³	10/31/2011	Amie C. Kefauver Middletown, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-46 ³	10/31/2011	Joseph W. Kefauver Middletown, MD	Form Letter
C21	11/4/2011	Hank Kehlbeck Myersville, MD	
C75A-36 ³	10/26/2011	Christy Kehlbeck Myersville, MD	Form Letter
C123	11/19/2011	Hank Kehlbeck Myersville, MD	
C49A-34 ³	11/10/2011	Dianne & Fred Keilholtz Myersville, MD	Form Letter
C62A-88 ³	11/14/2011	Rick Keller Myersville, MD	Form Letter
C62A-89 ³	11/14/2011	Chad Keller Myersville, MD	Form Letter
C62A-90 ³	11/14/2011	Guynella J. Keller Myersville, MD	Form Letter
C62A-91 ³	11/14/2011	Claude E. Keller Myersville, MD	Form Letter
C144A-60 ³	10/31/2011	Chris Kellogg Myersville, MD	Form Letter
C144A-61 ³	10/31/2011	Philip M. Kellogg, III Myersville, MD	Form Letter
C184	11/19/2011	Farrell Keough EngagedCitizen - Chairman Frederick, MD	
C49A-10 ³	11/10/2011	Kathy Keyser Middletown, MD	Form Letter
C113A-20 ³	10/26/2011	Denise Kiley Myersville, MD	Form Letter
C113A-21 ³	10/26/2011	Lance A. Kirkpatrick Myersville, MD	Form Letter
C64A-21 ³	10/31/111	Andre Kiss Myersville, MD	Form Letter
C64A-22 ³	10/31/111	Beatrice Kiss Myersville, MD	Form Letter
C62A-34 ³	11/14/2011	Richard L. Klabansky Myersville, MD	Form Letter
C62A-35 ³	11/14/2011	Jennifer Klabansky Myersville, MD	Form Letter
C102A-7 ³	10/31/2011	Stanley C. Kline Myersville, MD	Form Letter
C62A-21 ³	11/14/2011	Amy Kreger Middletown, MD	Form Letter
C62A-22 ³	11/14/2011	Kevin J. Kreger Middletown, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C75A-9 ³	10/26/2011	Amy Kreger Middletown, MD	Form Letter
C113A-46 ³	10/26/2011	Kevin Kreger Middletown, MD	Form Letter
C122	11/19/2011	Kristine	
C159	10/31/2011	Patricia M. Krizenesky Myersville, MD	Form Letter
C62A-59 ³	11/14/2011	Joe & Jill Kulina Myersville, MD	Form Letter
MSM15-1	11/7/2011	Bill Lanbow Middletown, MD	
C62A-28 ³	11/14/2011	Bryan Laster Middletown, MD	Form Letter
C62A-61 ³	11/14/2011	Diane Lawson Myersville, MD	Form Letter
C62A-62 ³	11/14/2011	Randy D. Lawson Myersville, MD	Form Letter
C62A-139 ³	11/14/2011	Kathy Leber Myersville, MD	Form Letter
C60	11/14/2011	Paul Lehmann Brunswick, MD	
C37	10/30/2011	Joseph Leonard Myersville, MD	Form Letter
C144A-27 ³	10/31/2011	Joan Leuthner Myersville, MD	Form Letter
C62A-163 ³	11/14/2011	Mary & David Lin Myersville, MD	Form Letter
C100	10/31/2011	Linda L. Myersville, MD	Form Letter
C144A-52 ³	10/31/2011	Karyn Lindsay Middletown, MD	Form Letter
C19	11/4/2011	Jenny Linthicum Myersville, MD	
C44	11/9/2011	Jenny Linthicum Myersville, MD	
C62A-46 ³	11/14/2011	Jenny Linthicum Myersville, MD	Form Letter
C62A-47 ³	11/14/2011	Bryant Linthicum Myersville, MD	Form Letter
MSM30-1	11/7/2011	Jenny Linthicum Myersville, MD	
C144A-29 ³	10/31/2011	Timothy Linton Myersville, MD	Form Letter
C144A-30 ³	10/31/2011	Carol Linton Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-31 ³	10/31/2011	William Linton Myersville, MD	Form Letter
C144A-28 ³	10/31/2011	George M. Linton, Jr. Myersville, MD	Form Letter
C62A-55 ³	11/14/2011	Andy Lofstgrand Handy Andy Myersville, MD	Form Letter
C144A-22 ³	10/31/2011	Loreen Lofts Myersville, MD	Form Letter
C144A-23 ³	10/31/2011	Richard S. Lofts Myersville, MD	Form Letter
C14	10/25/2011	Faith Lotsikas Myersville, MD 21773	Form Letter
C75A-47 ³	10/26/2011	Dr. Peter Lotsikas Myersville, MD	Form Letter
C120	11/18/2011	Faith M. Lotsikas	
MSM39-1	11/7/2011	Peter Lotsikas Myersville, MD	
C62A-131 ³	11/14/2011	Jonathan Lucas Myersville, MD	Form Letter
C62A-156 ³	11/14/2011	Sarah Lucas Myersville, MD	Form Letter
S4	11/18/2011	Lucy School, An Arts Based School & Teacher Training Center C.P. Zachariadis, President	
C64A-11 ³	10/31/111	Sandra Lynch Myersville, MD	Form Letter
C71	10/31/2011	Kevin Lynott Myersville, MD	Form Letter
C144A-59 ³	10/31/2011	Donna Macenka & Allen Foreman Myersville, MD	Form Letter
C144A-18 ³	10/31/2011	George C. Maerz Myersville, MD	Form Letter
C113A-22 ³	10/26/2011	Nancy Maher Myersville, MD	Form Letter
C113A-23 ³	10/26/2011	Mike Maher Myersville, MD	Form Letter
MSM25-1	11/7/2011	Nancy Maher Myersville, MD	
C51	11/11/2011	Pamela Malagari	
C79	10/26/2011	Pamela Malagari Middletown, MD	
C65	11/15/2011	Tammy Mangan Myersville, MD	
MSM3-1	11/7/2011	Joseph Mangiafico Myersville, MD	

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
MSM8-1	11/7/2011	Joseph A. Mangiafico Myersville, MD	
MSM18-1	11/7/2011	Mr. Mangiafico	
C64A-19 ³	10/31/111	George & Patricia Margerum Myersville, MD	Form Letter
C49A-5 ³	11/10/2011	Elizabeth Mark Myersville, MD	Form Letter
C9	10/25/2011	Annabelle L. Martin Myersville, MD 21773-0094	Form Letter
C49A-3 ³	11/10/2011	George A. Martin Middletown, MD	Form Letter
C49A-4 ³	11/10/2011	Janet B. Martin Middletown, MD	Form Letter
C49A-20 ³	11/10/2011	Nicole H. Martin Middletown, MD	Form Letter
C62A-49 ³	11/14/2011	Jane H. Martin Myersville, MD	Form Letter
C62A-182 ³	11/14/2011	William & Jacki Martin Myersville, MD	Form Letter
C75A-31 ³	10/26/2011	Marjorie H. Martin Myersville, MD	Form Letter
C62A-169 ³	11/14/2011	Jim & Mary Rippeon Myersville, MD	Form Letter
S3	11/17/2011	Maryland House of Delegates Ways and Means Committee Kathy Afzali	
S6	11/22/2011	Maryland House of Delegates Economic Matters Committee Kelly Schulz	
C64A-25 ³	10/31/111	Bruce & Grace May Myersville, MD	Form Letter
C113A-51 ³	10/26/2011	Carolyn McCall Myersville, MD	Form Letter
C179	11/23/2011	Carolyn McCall	
C91	10/31/2011	Linda L. McCanner Myersville, MD	Form Letter
C15	11/2/2011	Susan McCarrick Myersville, MD 21773	
C24	11/2/2011	Maureen McCarrick Myersville, MD	Form Letter
C75A-46 ³	10/26/2011	Susan McCarrick Myersville, MD 21773	Form Letter
MSM35-1	11/7/2011	McCauley Brown Myersville, MD	
C144A-8 ³	10/31/2011	Nancy D. McCorkle Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C64A-1 ³	10/31/2011	Carol McFadden Myersville, MD	Form Letter
C152	10/31/2011	Patricia McGaba Myersville, MD	Form Letter
C134	10/26/2011	lain W. McKenzie Middletown, MD	Form Letter
C135	10/26/2011	Karen McKenzie Middletown, MD	Form Letter
C59	11/11/2011	Meredith McKittrick Myersville, MD	
MSM38-1	11/7/2011	Meredith McKittrick Myersville, MD	
C113A-9 ³	10/26/2011	Penny McQuarrie Middletown, MD	Form Letter
C113A-47 ³	10/26/2011	Donna M. Mead Myersville, MD	Form Letter
C113A-68 ³	10/26/2011	Mark K. Mead Myersville, MD	Form Letter
C64A-7 ³	10/26/2011	Ross Merchant Myersville, MD	Form Letter
C101	10/31/2011	Suzanne Metzner Myersville, MD	Form Letter
C38	11/3/2011	Kimberly Michaels Myersville, MD	
C62A-11 ³	11/14/2011	Mid-Maryland Construction, Inc. Wayne Grossnickle Myersville, MD	Form Letter
C75A-25 ³	10/26/2011	Michael Milidas Myersville, MD	Form Letter
C128	11/20/2011	Janet A. Miliward Myersville, MD	
C62A-58 ³	11/14/2011	David M. Miller Middletown, MD	Form Letter
C62A-98 ³	11/14/2011	Francis E. Miller Myersville, MD	Form Letter
C138	10/26/2011	Ann Marie Miller Linda Jack Middletown, MD	Form Letter
C33	11/7/2011	Tom Mills Myersville, MD	
C62A-133 ³	11/14/2011	David C. Mills Middletown, MD	Form Letter
C62A-134 ³	11/14/2011	Lori D. Mills Middletown, MD	Form Letter
C62A-135 ³	11/14/2011	David C. Mills, CC Middletown, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-13 ³	10/31/2011	Catia Mills Myersville, MD	Form Letter
MSM27-1	11/7/2011	Rick Millward Myersville, MD	
C75A-20 ³	10/26/2011	Steven Raney Miss Middletown, MD	Form Letter
C62A-171 ³	11/14/2011	Lauri Mongelluzo Myersville, MD	Form Letter
C62A-170 ³	11/14/2011	Chris Mongelluzzo Myersville, MD	Form Letter
C144A-12 ³	10/31/2011	Christine Monical Myersville, MD	Form Letter
C112	10/26/2011	Mrs. Thomas Monroe Myersville, MD	Form Letter
C155	10/31/2011	Dina Montysko Myersville, MD	Form Letter
C156	10/31/2011	Eric Montysko Myersville, MD	Form Letter
C62A-141 ³	11/14/2011	Marianne & Roger L. Moore Myersville, MD	Form Letter
C144A-62 ³	10/31/2011	Shawn Morris Myersville, MD	Form Letter
C75A-29 ³	10/26/2011	Kelly Moss Myersville, MD	Form Letter
C113A-60 ³	10/26/2011	Joseph Mrozinksi Myersville, MD	Form Letter
C75A-32 ³	10/26/2011	Jolec Mrozinski Myersville, MD	Form Letter
C192	11/23/2011	Joseph Mrozinski Myersville, MD	
C62A-147 ³	11/14/2011	MSB Architects M. Scott Bowen Myersville, MD	Form Letter
MSM9-1	11/7/2011	Steve Mueller Myersville, MD	
MSM28-1	11/7/2011	Steve Mueller Myersville, MD	
C69	10/31/2011	Justin Muller Frederick, MD	Form Letter
C64A-9 ³	10/31/111	Keith A. Mullican Myersville, MD	Form Letter
C64A-5 ³	10/26/2011	Jake Murchant Myersville, MD	Form Letter
C62A-2 ³	11/14/2011	Musket Ridge Golf Club David Swales Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C49A-2 ³	11/10/2011	Myers Plumbing & Heating Robert Myers Myersville, MD	Form Letter
C113A-75 ³	10/26/2011	David Nau Myersville, MD	Form Letter
C113A-76 ³	10/26/2011	Ann M. Nau Myersville, MD	Form Letter
C163	11/22/2011	Ann M. Nau Myersville, MD	
C145	11/21/2011	Tracy Neal Fort Worth, TX	
C178	11/22/2011	Nancy Neal	
C62A-177 ³	11/14/2011	Teresa Nogueira Myersville, MD	Form Letter
C62A-132 ³	11/14/2011	Daniel R. O'Brien Myersville, MD	Form Letter
C62A-144 ³	11/14/2011	Tina Oden Myersville, MD	Form Letter
C144A-63 ³	10/31/2011	Kate O'Leary Myersville, MD	Form Letter
C32	11/7/2011	Michele Olson Myersville, MD	
C113A-41 ³	10/26/2011	Jeff Olson Myersville, MD	Form Letter
C173	11/22/2011	Jeffrey Olson Myersville, MD	
C113A-70 ³	10/26/2011	Andris M. P. Myersville, MD	Form Letter
C84	10/31/2011	Carla M. Palamone Myersville, MD	Form Letter
C144A-14 ³	10/31/2011	Nicole Parrotte Myersville, MD	Form Letter
C144A-15 ³	10/31/2011	Christine Parrotte Myersville, MD	Form Letter
C144A-16 ³	10/31/2011	Ronad A. Parrotte Myersville, MD	Form Letter
C144A-17 ³	10/31/2011	Elizabeth Parrotte Myersville, MD	Form Letter
C96	10/31/2011	Paul	Form Letter
C86	10/31/2011	Matt & Paula Kifea Myersville, MD	Form Letter
C75A-48 ³	10/26/2011	Anita Varsbcrgs Paza Myersville, MD	Form Letter
C117	11/18/2011	Andris Paza	
C62A-29 ³	11/14/2011	Charles A. Pearl Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-30 ³	11/14/2011	Sally A. Pearl Myersville, MD	Form Letter
C113A-28 ³	10/26/2011	Robert L. Pearl Myersville, MD	Form Letter
C113A-62 ³	10/26/2011	Mary S. Pearl Myersville, MD	Form Letter
C75A-27 ³	10/26/2011	Kelley Pell-Williams Myersville, MD	Form Letter
C75A-30 ³	10/26/2011	Karla Pena Myersville, MD	Form Letter
C62A-48 ³	11/14/2011	Doris E. Perry Myersville, MD	Form Letter
C62A-71 ³	11/14/2011	Robert C. Phelps Myersville, MD	Form Letter
C62A-72 ³	11/14/2011	Cristy L. Phelps Myersville, MD	Form Letter
C62A-73 ³	11/14/2011	April C. Phelps Myersville, MD	Form Letter
C113A-32 ³	10/26/2011	Frank Philipone Myersville, MD	Form Letter
C113A-39 ³	10/26/2011	Deborah Philipone Myersville, MD	Form Letter
C85	10/31/2011	Margaret Phillips Myersville, MD	Form Letter
C62A-42 ³	11/14/2011	Sharon E. Pickett Myersville, MD	Form Letter
C144A-3 ³	10/31/2011	Paul D. Pieklo, Jr. Myersville, MD	Form Letter
C62A-39 ³	11/14/2011	John D. Pierce, Jr. Middletown, MD	Form Letter
C113A-7 ³	10/26/2011	Andrea Poffinberger Middletown, MD	Form Letter
C113A-43 ³	10/26/2011	Elizabeth & Charles Poffinberger Myersville, MD	Form Letter
C113A-81 ³	10/26/2011	Terry Poffinberger Middletown, MD	Form Letter
C116	10/31/2011	Mr. & Mrs. Edgar Poffinberger, Jr. Middletown, MD	Form Letter
C62A-154 ³	11/14/2011	M.E. Poole Myersville, MD	Form Letter
C75A-8 ³	10/26/2011	Allesandro Portuesi Myersville, MD	Form Letter
MSM22-1	11/7/2011	John Potter Myersville, MD	
C62A-116	11/14/2011	Mary F. & Frederick Powell, Sr. Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C113A-74 ³	10/26/2011	Nancy Pressly Myersville, MD	Form Letter
C49A-18 ³	11/10/2011	Professional Property Services, Ltd. Jacqueline Morris Myersville, MD	Form Letter
C49A-17 ³	11/10/2011	Professional Property Services, Ltd. Mary & Harry Van Mater Myersville, MD	Form Letter
C49A-19 ³	11/10/2011	Professional Property Services, Ltd Carol Van Mater Myersville, MD	Form Letter
C113A-54 ³	10/26/2011	Jennifer Pryor Myersville, MD	Form Letter
C144A-39 ³	10/31/2011	Michael & Amy Pryor Myersville, MD	Form Letter
C113A-48 ³	10/26/2011	Edward A. Purks Middletown, MD	Form Letter
C56	11/14/2011	Steve Ramsey	
C62A-153 ³	11/14/2011	Steve Ramsey Myersville, MD	Form Letter
C62A-1 ³	11/14/2011	Barbara Tiernan Ramsey, JD Myersville, MD	Form Letter
C113A-44 ³	10/26/2011	Linda Rapp Myersville, MD	Form Letter
C113A-65 ³	10/26/2011	Brian Rapp Myersville, MD	Form Letter
C62A-168 ³	11/14/2011	Linda S. Rea Myersville, MD	Form Letter
C62A-172 ³	11/14/2011	Ronald L. Rea Myersville, MD	Form Letter
C64A-32 ³	10/31/111	Brian & Beth Reed Myersville, MD	Form Letter
C62A-19 ³	11/14/2011	Ronald F. Reed, Jr. Myersville, MD	Form Letter
C64A-17 ³	10/31/111	Dennis A. & Linda E. Reese Middletown, MD	Form Letter
C160	10/31/2011	Randy Reese Myersville, MD	Form Letter
C144A-49 ³	10/31/2011	Gary Reidinger Myersville, MD	Form Letter
C144A-50 ³	10/31/2011	Beverly Reidinger Myersville, MD	Form Letter
C64A-4 ³	10/26/2011	Steve Richardson Myersville, MD	Form Letter
C64A-6 ³	10/26/2011	Dawn Viands Richardson Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C113A-2 ³	10/26/2011	Karen Ricketts-Ranage Myersville, MD	Form Letter
C62A-113 ³	11/14/2011	Laci Riddle Myersville, MD	Form Letter
C102A-5 ³	10/31/2011	Terrrianne Ridenour Myersville, MD	Form Letter
C28	11/5/2011	Carol Riley	
C62A-67 ³	11/14/2011	Thomas Rinehart Myersville, MD	Form Letter
C62A-68 ³	11/14/2011	Sharon Rinehart Myersville, MD	Form Letter
C62A-107 ³	11/14/2011	Mary Beth Rippeon Myersville, MD	Form Letter
C62A-108 ³	11/14/2011	Julie Rippeon Myersville, MD	Form Letter
C62A-63 ³	11/14/2011	Keith Roberson Myersville, MD	Form Letter
C62A-64 ³	11/14/2011	Julie Roberson Myersville, MD	Form Letter
C62A-65 ³	11/14/2011	Corey Roberson Myersville, MD	Form Letter
C62A-66 ³	11/14/2011	Casey Roberson Myersville, MD	Form Letter
C144A-41 ³	10/31/2011	Nancy A. & Bruce A. Roberson Myersville, MD	Form Letter
C62A-96 ³	11/14/2011	Baron Rodriquez Myersville, MD	Form Letter
C62A-97 ³	11/14/2011	Brenda Rodriquez Myersville, MD	Form Letter
C113A-19 ³	10/26/2011	James Roybury Myersville, MD	Form Letter
C62A-146 ³	11/14/2011	Sharon Rudy Middletown, MD	Form Letter
C113A-3 ³	10/26/2011	Sharon Rudy Middletown, MD	Form Letter
C143	10/25/2011	Cathy Russell Myersville, MD	Form Letter
C144A-58 ³	10/31/2011	Steve Russell Myersville, MD	Form Letter
C113A-6 ³	10/26/2011	Elizabeth S. Frederick, MD	Form Letter
C62A-37 ³	11/14/2011	Edward H. Salmon Myersville, MD	Form Letter
C62A-38 ³	11/14/2011	Emily M. Salmon Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-50 ³	11/14/2011	Kelly L. Salmon Myersville, MD	Form Letter
C62A-179 ³	11/14/2011	Edward E. Salmon Myersville, MD	Form Letter
C62A-12 ³	11/14/2011	Gregg Salsi Myersville, MD	Form Letter
C62A-25 ³	11/14/2011	Jean Salsi Myersville, MD	Form Letter
C62A-80 ³	11/14/2011	James & Deborah Sand Myersville, MD	Form Letter
C144A-43 ³	10/31/2011	Michelle A. Schiller Myersville, MD	Form Letter
C144A-44 ³	10/31/2011	Paul M. Schiller Myersville, MD	Form Letter
C98	10/31/2011	Frank Schmersahl Myersville, MD	Form Letter
C99	10/31/2011	Carol Schmersahl Myersville, MD	Form Letter
C62A-85 ³	11/14/2011	Nickolas Kendal Schoch Myersville, MD	Form Letter
C62A-86 ³	11/14/2011	Joseph Michael Schoch Myersville, MD	Form Letter
C62A-87 ³	11/14/2011	Michele L. Keller Schoch Myersville, MD	Form Letter
C64A-26 ³	10/31/111	Kimberly Schroth-Meyer Myersville, MD	Form Letter
C76	10/26/2011	Harvey D. Schroyer, Jr. Myersville, MD	Form Letter
C62A-120 ³	11/14/2011	Marianne Schumm Myersville, MD	Form Letter
C17	11/2/2011	Frederic Sevin Myersville, MD	Form Letter
C64A-15 ³	10/31/111	Fredric Sevin Myersville, MD	Form Letter
C105	10/26/2011	Linda Sevin Myersville, MD	Form Letter
C107	10/26/2011	Monique Sevin Myersville, MD	Form Letter
C111	10/26/2011	Nicole Sevin Myersville, MD	Form Letter
C141	10/26/2011	Jean-Claude Sevin	Form Letter
MSM43-1	11/7/2011	Frederic Sevin Myersville, MD	
C62A-17 ³	11/14/2011	Joan Sexton Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-18 ³	11/14/2011	Jamie Sexton Myersville, MD	Form Letter
C78	10/26/2011	Mildred R. Shafer Myersville, MD	Form Letter
C102A-1 ³	10/31/2011	Bryant Shafer Myersville, MD	Form Letter
C47	11/10/2011	Kelly Shealer	
C113A-15 ³	10/26/2011	Sheldon Shealer Myersville, MD	Form Letter
C113A-80 ³	10/26/2011	Kelly Shealer Myersville, MD	Form Letter
C75A-1 ³	10/26/2011	Cathy Shook Myersville, MD	Form Letter
C82	10/31/2011	Carol Shroyer Myersville, MD	Form Letter
C113A-50 ³	10/26/2011	C. Edward Sigler, Jr. Myersville, MD	Form Letter
C81	10/26/2011	Unreadable Signature	Form Letter
C113A-4 ³	10/26/2011	Unreadable Signature Frederick, MD	Form Letter
C113A-5 ³	10/26/2011	Unreadable Signature Frederick, MD	Form Letter
C3	10/28/2011	Stephanie L. Simek Myersville, MD	
C131	10/26/2011	James R. Sleeth Frederick, MD	Form Letter
C132	10/26/2011	Olivia F. Sleeth Frederick, MD	Form Letter
C62A-69 ³	11/14/2011	Nancy & Paul S. Smith Myersville, MD	Form Letter
C64A-12 ³	10/31/111	Michael D. Smith Myersville, MD	Form Letter
C64A-27 ³	10/31/111	Sandra Smith Myersville, MD	Form Letter
C75A-51 ³	10/26/2011	Roberta L. Smith Myersville, MD	Form Letter
C93	10/31/2011	Charles & Gladys Smith Myersville, MD	Form Letter
C102A-16 ³	10/31/2011	Ralph W. Smith Myersville, MD	Form Letter
C102A-17 ³	10/31/2011	Dennis E. Smith Myersville, MD	Form Letter
C102A-18 ³	10/31/2011	Edward R. & Deanna S. Smith Myersville, MD	Form Letter
C113A-34 ³	10/26/2011	Philip H. Smith Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C113A-58 ³	10/26/2011	Casey Smith Myersville, MD	Form Letter
C113A-59 ³	10/26/2011	Charles Smith, Jr. Myersville, MD	Form Letter
C113A-10 ³	10/26/2011	Charles Smith, Sr. Myersville, MD	Form Letter
C75A-40 ³	10/26/2011	Sandra Snapp Myersville, MD	Form Letter
C49A-15 ³	11/10/2011	Donald Gregory Snider Myersville, MD	Form Letter
C49A-16 ³	11/10/2011	Patricia E. Snider Myersville, MD	Form Letter
C62A-4 ³	11/14/2011	South Mountain Creamery Randy Sowers Middletown, MD	Form Letter
C113A-55 ³	10/26/2011	William Sovitsky Myersville, MD	Form Letter
C42	11/8/2011	Jason Sparks	
MSM4-1	11/7/2011	Speaker from Audience	
MSM10-1	11/7/2011	Speaker from Audience	
MSM11-1	11/7/2011	Speaker from Audience	
MSM12-1	11/7/2011	Speaker from Audience	
MSM54-1	11/7/2011	Speaker from Audience	
C75A-5 ³	10/26/2011	Robert R. Sprague Myersville, MD	Form Letter
C75A-34 ³	10/26/2011	Raymond S. Sprague Myersville, MD	Form Letter
C36	11/7/2011	Jotina Sprudell	
C113A-36 ³	10/26/2011	Patricia St. Andre Myersville, MD	Form Letter
C157	10/31/2011	Michelle K. Staffieri Myersville, MD	Form Letter
C158	10/31/2011	William P. Staffieri Myersville, MD	Form Letter
C88	10/31/2011	Mary K. Stann Myersville, MD	Form Letter
C64A-13 ³	10/31/111	Veronia & Thomas Stein Myersville, MD	Form Letter
MSM14-1	11/7/2011	Lisa Stein Myersville, MD	
C20	11/4/2011	Bob Stephens Myersville, MD	Form Letter
C49A-1 ³	11/10/2011	James Stephens Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-174 ³	11/14/2011	Erin Sterner Myersville, MD	Form Letter
C62A-175 ³	11/14/2011	Phil Sterner Myersville, MD	Form Letter
C49A-7 ³	11/10/2011	Ronald L. Stevens Myersville, MD	Form Letter
C49A-8 ³	11/10/2011	Mary K. Stevens Myersville, MD	Form Letter
C144A-47 ³	10/31/2011	Robert J. Stewart Myersville, MD	Form Letter
C144A-53 ³	10/31/2011	Robin Stewart Myersville, MD	Form Letter
C94	10/31/2011	William P. Stine Myersville, MD	Form Letter
C10	10/25/2011	Annalise J. Stines Myersville, MD 21773-0094	Form Letter
C49A-14 ³	11/10/2011	Robert W. Stone Myersville, MD	Form Letter
C62A-183 ³	11/14/2011	Nigel Stone Myersville, MD	Form Letter
C62A-184 ³	11/14/2011	Bridget Stone Myersville, MD	Form Letter
C62A-32 ³	11/14/2011	Diane B. Sullivan Myersville, MD	Form Letter
C62A-33 ³	11/14/2011	David B. Sullivan Myersville, MD	Form Letter
C146	11/18/2011	David B. & Diane B. Sullivan Myersville, MD	
C144A-4 ³	10/31/2011	Ester Summers Myersville, MD	Form Letter
C144A-5 ³	10/31/2011	Joe Summers Myersville, MD	Form Letter
C144A-7 ³	10/31/2011	David Earl Summers Myersville, MD	Form Letter
C103	10/26/2011	Mark & Shelley Sunkel Myersville, MD	Form Letter
C183	11/10/2011	Michelle D. Sweet Myersville, MD	
MSM26-1	11/7/2011	Brittany Sweet Myersville, MD	
MSM37-1	11/7/2011	Doug Sweet Myersville, MD	
C75A-13 ³	10/26/2011	Max Szabo Myersville, MD	Form Letter
C75A-16 ³	10/26/2011	Jennifer Szabo Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
MSM19-1	11/7/2011	Gracie Szabo Myersville, MD	
C62A-15 ³	11/14/2011	Sharron D. Tan Myersville, MD	Form Letter
C62A-16 ³	11/14/2011	Ryan Tan Myersville, MD	Form Letter
C170	11/22/2011	Tanya Miller	
C31	11/6/2011	Michele Tartaglia Myersville, MD	
C164	11/22/2011	Michele Tartaglia Myersville, MD	
MSM33-1	11/7/2011	MichelleTartaglia Myersville, MD	
C4	10/28/2011	Chad Tasker Myersville, MD	
C13	10/25/2011	Chad Tasker Myersville, MD 21773	Form Letter
C46	11/9/2011	Chad Tasker Myersville, MD	
C144A-48 ³	10/31/2011	Warren & Cecilia Teague Myersville, MD	Form Letter
C26	11/4/2011	Chris Tessler Myersville, MD	
C27	11/4/2011	Christy Tessler Myersville, MD	
MSM2-1	11/7/2011	Dexter Thompkins Myersville, MD	
C62A-136 ³	11/14/2011	Angela D. Thompson Middletown, MD	Form Letter
C62A-137 ³	11/14/2011	Bruce A. Thompson Middletown, MD	Form Letter
C62A-138 ³	11/14/2011	Jacob W. Thompson Middletown, MD	Form Letter
C102A-3 ³	10/31/2011	Dana Thompson Middletown, MA	Form Letter
C150	10/31/2011	Jeff & Tammie Thompson Myersville, MD	Form Letter
C114	10/31/2011	Deric Tipton Myersville, MD	Form Letter
C115	10/31/2011	Elayne Tipton Myersville, MD	Form Letter
C49A-6 ³	11/10/2011	Lois E. Todd Middletown, MD	Form Letter
C62A-142 ³	11/14/2011	Katherine Todd Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C62A-143 ³	11/14/2011	Michael A. Todd Myersville, MD	Form Letter
C102A-20 ³	10/31/2011	Ernest Travars Myersville, MD	Form Letter
MSM17-1	11/7/2011	Bob Martin, Executive Director Tree-Land Foundation Myersville, MD	
C102A-19 ³	10/31/2011	Mark Trent Myersville, MD	Form Letter
C40	11/9/2011	Christy Tressler	
MSM36-1	11/7/2011	Aubrey Troop Myersville, MD	
C49A-24 ³	11/10/2011	Scott D. Tuomey Myersville, MD	Form Letter
C64A-14 ³	10/31/111	Lewis Thomas Turner, Jr. Middletown, MD	Form Letter
F3	11/23/2011	USACE Baltimore District Joseph P. DaVia, Chief	
C75A-35 ³	10/26/2011	Valerie Usui Myersville, MD	Form Letter
C49A-12 ³	11/10/2011	Carol L. Van Mater Myersville, MD	Form Letter
C49A-13 ³	11/10/2011	Harry Van Mater Myersville, MD	Form Letter
C52	11/11/2011	Daniel Velez Myersville, MD	
C144A-55 ³	10/31/2011	J. Veniard Myersville, MD	Form Letter
C144A-34 ³	10/31/2011	Jose Vera Myersville, MD	Form Letter
C18	11/3/2011	Ann & Paul Veraart Myersville, MD	
C106	10/26/2011	Edgar & Griselia Villaroso Myersville, MD	Form Letter
C49A-32 ³	11/10/2011	Edward & Sharon Wade Middletown, MD	Form Letter
C121	11/3/2011	Washington Gas Eric C. Grant, VP Corporate Relations	
C62A-176 ³	11/14/2011	Rebecca Watkins Middletown, MD	Form Letter
C144A-32 ³	10/31/2011	Tammy L. Watson Myersville, MD	Form Letter
C144A-33 ³	10/31/2011	Joan J. Watson Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-37 ³	10/31/2011	Michael Watson Myersville, MD	Form Letter
C62A-43 ³	11/14/2011	Della Weichert Myersville, MD	Form Letter
C62A-44 ³	11/14/2011	David Weichert Myersville, MD	Form Letter
C64A-2 ³	10/31/111	Laurie Weisman Myersville, MD	Form Letter
C113A-17 ³	10/26/2011	David Weltman Middletown, MD	Form Letter
C113A-18 ³	10/26/2011	Tamara Weltman Middletown, MD	Form Letter
C113A-26 ³	10/26/2011	Laura Whitesell Myersville, MD	Form Letter
C113A-27 ³	10/26/2011	Thomas Whitesell Myersville, MD	Form Letter
C49A-11 ³	11/10/2011	Sonya & Paul Wiles Myersville, MD	Form Letter
C62A-111 ³	11/14/2011	John Wiles Myersville, MD	Form Letter
C62A-112 ³	11/14/2011	Gloria Wiles Myersville, MD	Form Letter
C104	10/26/2011	Patricia Wiles Myersville, MD	Form Letter
C144A-19 ³	10/31/2011	Myralee G. Wiles Myersville, MD	Form Letter
C193	11/23/2011	Eric Wilkinson	
C194	11/23/2011	Michelle Wilkinson	
C49A-23 ³	11/10/2011	Hazel J. Williams Myersville, MD	Form Letter
C62A-45 ³	11/14/2011	Mrs. Pettye Williams Myersville, MD	Form Letter
C75A-26 ³	10/26/2011	Tony R. Williams Myersville, MD	Form Letter
C92	10/31/2011	John & Joan E. Williams Myersville, MD	Form Letter
C195	11/23/2011	Stephen Williams	
C75A-2 ³	10/26/2011	Lori Williamson Myersville, MD	Form Letter
C34	11/7/2011	Beth Willis	
C64A-10 ³	10/31/111	David & Melinda Wilson Myersville, MD	Form Letter
C144A-35 ³	10/31/2011	Anne C. Wing Myersville, MD	Form Letter

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
C144A-36 ³	10/31/2011	David B. Wing Myersville, MD	Form Letter
MSM6-1	11/7/2011	Jessica Winter Jefferson, MD	
C30	11/6/2011	Anne Wisnieski	
C113A-49 ³	10/26/2011	Ginny Wolf Middletown, MD	Form Letter
C113A-66 ³	10/26/2011	Jeanne Wolf	Form Letter
C129	11/7/2011	Mrs. Mildred V. Wolfe Myersville, MD	
C54	11/11/2011	Joseph Wolfinger	
C62A-41 ³	11/14/2011	Jane C. Wolfinger Myersville, MD	Form Letter
MSM47-1	11/7/2011	Joel Wolfinger Myersville, MD	
C144A-24 ³	10/31/2011	Tressa Wolfkill Middletown, MD	Form Letter
C144A-25 ³	10/31/2011	Paul E. Wolfkill, Jr. Middletown, MD	Form Letter
C102A-4 ³	10/31/2011	Teresa C. Wood Myersville, MD	Form Letter
C49A-31 ³	11/10/2011	Sandra Woodruff Myersville, MD	Form Letter
C62A-13 ³	11/14/2011	Leslie Woods Middletown, MD	Form Letter
C124	11/20/2011	Mr. and Mrs. Matthew Working Myersville, MD	
C144A-40 ³	10/31/2011	Matthew & Terri Working Myersville, MD	Form Letter
MSM46-1	11/7/2011	Chris Zachariarez Lucy School Myersville, MD	
C62A-84 ³	11/14/2011	Frank Zarket Myersville, MD	Form Letter
C113A-67 ³	10/26/2011	Dianne Zepp Myersville, MD	Form Letter
C62A-23 ³	11/14/2011	Judy Ziegler Myersville, MD	Form Letter
C75A-52 ³	10/26/2011	Joan Zwack Myersville, MD	Form Letter
C75A-53 ³	10/26/2011	Herbert Zwack Myersville, MD	Form Letter

¹ C designates comment received from the public; F designates comment received from federal agency; G designates comment from county agency; S designates comment received from state agency; and MSM designates comment received during FERC public scoping meeting.

² A total of four form letters (e.g., letters that contained identical comments) were received.

TABLE 1. Commenters on the Maryland Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes ²
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Comments received from Commenters C15, C17, and C24 are addressed in responses to Comment C15. Comments received from Commenters C3 and C20 are addressed in responses to Commenter C3. Comments received from Commenters C167, C168, C169, and C181 are addressed in responses to Commenter C167.

The remainder are addressed in responses to Commenter C4.

³ Letters from these commenters were filed in batches and are identified with one Commenter identification number (e.g., C3) with an alpha designator (e.g., A), and a unique number for each commenter within that batch (e.g., 1, 2, etc.).

TABLE 2. Commenters on the Ohio and Pennsylvania Facilities

Commenter Number ¹	Date of Comment	Commenter	Notes
C196	11/21/2011	Rodger L. Burgess Powhatatn Point, OH	
PSM-1	11/8/11	Judy Darah Powhattan Point, Ohio	
F2	11/18/2011	National Park Service Mary Morrison (Missy) External Review Coordinator	
S1	11/10/2011	Pennsylvania Department of Natural Resources	
F1	11/17/2011	U.S. Army Corps of Engineers Pittsburgh District Scott A. Hans, Chief	

¹ C designates comment received from the public; F designates comment received from federal agency; S designates comment received from state agency; and PSM designates comment received during FERC public scoping meeting.