



December 17, 2014

**VIA EMAIL**

James D. Hartman  
Tennessee Gas Pipeline Company, LLC  
1615 Suffield Street  
Agawam, MA 01001

RE: Misleading letter to landowners

Dear Mr. Hartman:

I have been provided copies of your December 12, 2014 letter to landowners along the proposed route for the Northeast Energy Direct pipeline.

**The second paragraph of your letter begins: “The Project is a federal undertaking.”** Mr. Hartman, the project is a private undertaking, and your company is seeking approval from the federal government. Your letter is crafted in such a way as to lead landowners to believe that the project has been approved, or even undertaken, by the federal government. One concerned citizen has written to me that, “Having been given the impression by [TGP] that he had no choice,” her friend gave your company permission to survey his land. He now knows that he can rescind permission, but not everyone is so well-informed.

Either prior to or in conjunction with notifying landowners of the open house schedule, I ask that your company include an explicit correction of your misleading statements, making clear above all else: While FERC has authorized TGP to use the agency's pre-filing procedures, **neither FERC nor any other government agency has approved the project in any way. This project is a private undertaking, not a federal undertaking, as erroneously stated in a previous letter.** Other misleading statements in your December 12<sup>th</sup> letter that warrant public correction by your company are outlined below.

In this letter, you assert that this project “is being developed to serve specifically the New England region” – even though your company's letter to FERC seeking to use pre-filing procedures states, “Potential Atlantic Canada customers include LDCs, power generators, industrials, and liquefied natural gas ('LNG') export projects.”

You also state that the project “will enable New England ... to lower energy costs,” even though (1) you do not and cannot promise lower energy costs, (2) natural gas prices are established by highly volatile commodities markets, and (3) the US EIA has concluded, “Increased LNG exports lead to increased natural gas prices.”<sup>1</sup>

Additionally, your letter states that the originally proposed Market Path component of the project consisted of approximately 177 miles of mainline pipeline and eight lateral lines totaling approximately

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<sup>1</sup> “Effect of Increased Levels of Liquefied Natural Gas Exports on U.S. Energy Markets,” October 29, 2014, *U.S. Energy Information Administration* (<http://www.eia.gov/analysis/requests/fe/>).

73 miles, while “the proposed revised route will now include approximately 188 miles of ... mainline pipeline facilities,” with no mention of the laterals. This leaves the false impression that either there are no longer laterals proposed or that the proposed number and route of laterals has not changed.

Furthermore, I do not believe there is any factual basis for your assertion that the company's new plan of widening utility corridor clearings, or putting clearings parallel to existing cleared corridors, would have the affect of “avoiding habitat fragmentation,” rather than exacerbating it.

It is also worth noting that the maps that your company has made available to the public are unwieldy and do not allow landowners to easily locate their own towns to see the proposed route; the files uploaded by your company to FERC's website are not named by geographic location. Inasmuch as “Tennessee strives to be a good neighbor,” please consider remedying this situation as well, with maps filed at FERC that show town boundaries, including file names or descriptions that reference the towns depicted. Should this prove too much of an administrative burden prior to the holidays, please send me the GIS shape files for the proposed route so that we can help individuals access the information they seek.

Finally, on the third page of your letter, you state that your company plans “in January to start meeting with affected landowners on a one-on-one basis to discuss survey needs and additional details regarding the Project.” Kindly advise landowners that, should they choose to meet with TGP representatives, they may bring along an attorney.

Best wishes for the holiday season,



Kathryn R. Eiseman, Director  
Massachusetts PipeLine Awareness Network

Cc:

Kimberly D. Bose, Secretary, Federal Energy Regulatory Commission  
Senator Elizabeth Warren  
Senator Edward Markey  
Congressman Richard Neal  
Attorney General Martha Coakley  
Thomas Lesser, Esq.