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March 26, 2020

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

Attention: Ms. Kimberly D. Bose, Secretary

Reference: Transcontinental Gas Pipe Line Company, LLC

Hillabee Expansion Project - Docket No. CP15-16-000

Request for Authorization to Place Phase II Facilities into Service and Provide Lease

Capacity

Ladies and Gentlemen:

On February 2, 2016, the Federal Energy Regulatory Commission ("Commission"), issued an order ("Order") in the above referenced docket granting Transcontinental Gas Pipe Line Company, LLC ("Transco") a certificate of public convenience and necessity to construct and operate in three phases the Hillabee Expansion Project ("Hillabee" or "Project") and to abandon the capacity by lease to Sabal Trail Transmission, LLC ("Sabal Trail")¹. The Order authorized Transco, among other things, to construct and operate the Phase II Project facilities designed to provide 206,660 dt/day of capacity with a target in-service date of May 1, 2020.

In accordance with Environmental Condition No. 9 of the Order, Transco hereby requests authorization to place into service the Phase II Project facilities on May 1, 2020, which will enable Transco to provide the Phase II lease capacity of 206,660 dt/day to Sabal Trail. As further described below, rehabilitation and restoration of the right-of-way and other areas affected by the Project are proceeding satisfactorily.

Rock Springs Loop – Construction of the 42-inch-diameter pipeline loop in Choctaw County, Alabama is complete. Tie-ins, cleanup, backfill, and final stabilization and restoration is nearing completion. Transco will re-seed areas as necessary where vegetation is not established. A reoccurring hillside slip area identified at milepost 787.8 has been temporarily stabilized until

¹ Florida Southeast Connection, LLC, et al., 154 FERC ¶ 61,080 (2016).

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engineers can determine a permanent solution to address the currently saturated slope. Representative photos of the Rock Springs Loop are provided as an attachment to this filing (see photos 1-7).

Verbena Loop – Construction of the 42-inch-diameter pipeline loop in Chilton County, Alabama is complete. Tie-ins, cleanup, backfill, and final stabilization and restoration is nearing completion. Transco will re-seed areas as necessary where vegetation is not established. Representative photos of the Verbena Loop are provided as an attachment to this filing (see photos 8-14).

Station 95 – Construction of the additional Solar Mars 100 driven compressor unit (16,000 hp) and re-wheeling of three existing Solar Mars driven compressor units at the existing Station 95 located in Dallas County, Alabama is complete, the 100 hour run is complete, and the station is fully operable. Clean-up/restoration activities at the site are complete and revegetation is successful throughout the site. Representative photos are provided as an attachment to this filing (see photos 15-18).

Transco will continue to monitor progress of restoration, rehabilitation, and revegetation and evaluate the need for re-seeding or other mitigation measures at each of the above facility sites. In that regard, the right-of-way will be inspected on a regular basis in accordance with the requirements of the Alabama Department of Environmental Management (ADEM) National Pollutant Discharge Elimination System (NPDES) permit requirements. At a minimum, inspections will be conducted at least once a month and after any 0.5 inch rain event and will consist of complete and comprehensive observations of all areas disturbed during construction. Transco will monitor the rainfall conditions and vegetative growth along the pipeline route and anticipates that the vegetative coverage will increase during the more typically wet summer months ahead. Transco will reevaluate the growth status throughout the summer growing season and will determine if additional re-seeding of specific areas will be required. In accordance with ADEM NPDES permit requirements, revegetation will be considered successful only when 100% of the soil surface is uniformly covered in permanent vegetation with a density of 85% or greater. Any area not meeting the criteria for successful revegetation will be re-seeded, and inspections will continue on a regular basis as specified above until successful revegetation is established.

Transco will retain inspection staff with responsibility to oversee completion of the restoration, rehabilitation, and revegetation of the right-of-way and compressor stations. Transco anticipates having one Environmental Inspector responsible for conducting the necessary inspections in accordance with the ADEM NPDES permits until the Notices of Termination for the permits are accepted by ADEM. The Environmental Inspector will also inspect erosion control devices and other work performed. The Environmental Inspector will be responsible for any remaining post-construction issues and will ensure they are resolved in accordance with the requirements and conditions of the applicable permits. The Environmental Inspector will be supported by Transco's Environmental Contractor.

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Transco will also retain contractor staff and equipment until final restoration is completed and all outstanding items have been addressed. Following acceptance of the work, the contractor will be contractually obligated for one year to return to the site and repair anything that involves defects in workmanship. As needed, Transco will contract with local restoration contractors to address any required post-construction re-seeding or repairs following demobilization of the construction contractor.

Transco will continue to implement the Landowner Complaint Resolution Procedure provided in Resource Report 1, Appendix 1.E of Transco's Application. Transco's Land Representatives will continue to work with landowners to ensure that any issues identified by landowners are addressed. Transco is committed to working with landowners to address concerns that are currently outstanding or that may arise following in-service.

Transco will continue to provide updates on the status of restoration in regular status reports to the Commission. Transco will also keep the Commission informed should any concerns arise following in-service.

Accordingly, pursuant to Environmental Condition No. 9 of the Order, Transco hereby requests that the Director of the Office of Energy Projects issue, by April 15, 2020, written authorization to Transco to place the Phase II Project facilities into service on May 1, 2020. Commission approval by April, 15, 2020 will enable the customers using the leased capacity to make the necessary commercial arrangements prior to the May 1, 2020 in-service date.

Please direct any questions regarding this filing to the undersigned at 713-215-4362 or andre.s.pereira@Williams.com.

Respectfully submitted,

TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC

By: <u>/s/ Andre Pereira</u>
Andre Pereira

Regulatory Analyst, Senior

Enclosure: Photos Attachment

cc: John Peconom, Commission Staff

Tony Dalbec, Merjent Andrew Karppinen, Merjent



Photo 1: Rock Springs Loop. Overview of restored rightof-way around the SCW9C001 stream crossing on 3/7/2020. Facing west.



Photo 2: Rock Springs Loop. View of restored rightof-way around the WCW9C003 wetland crossing on 3/7/2020. Facing east.



Photo 3: Rock Springs Loop. View of restored rightof-way back from the West Butler Road crossing on 3/7/2020. Facing west.



Photo 4: Rock Springs Loop. Overview of restored rightof-way near the WCW9C015 wetland and slide area on 3/7/2020. Facing southwest.



Photo 5: Rock Springs Loop. View of restored rightof-way around the WCW9C016 wetland crossings on 3/7/2020. Facing east.



Photo 6: Rock Springs Loop. View of restored rightof-way around the WCW9C017 wetland crossing on 3/7/2020. Facing east.



Photo 7: Rock Springs Loop. View of restored rightof-way around the Riderwood Road crossing on 3/7/2020. Facing east.



Photo 8: Verbena Loop. View of restored rightof-way from the beginning of the loop. Facing east.



Photo 9: Verbena Loop. View of restored rightof-way around the WCN14C030 wetland crossing. Facing east.



Photo 10: Verbena Loop. View of restored rightof-way from the Access Road 2 crossing. Facing east.



Photo 11:
Verbena Loop.
View of
restored rightback from the
Access Road 3
crossing.
Facing west.



Photo 12:
Verbena Loop.
View of
restored rightof-way from
the Access
Road 3
crossing.
Facing east.



Photo 13: Verbena Loop. View of restored rightof-way around the County Road 519 and 520 crossings. Facing east.



Photo 14: Verbena Loop. View of restored rightof-way at the end of the loop. Facing east.



Photo 15: Station 95. View of restored temporary workspace north of the facility entrance road on 3/25/2020. Facing west.



Photo 16: Station 95. View of the new addition on the east side of the facility on 3/25/2020. Facing south.



Photo 17:
Station 95.
View of permanently stabilized area around the new addition to the east side of the facility on 3/25/2020.
Facing north.



Photo 18: Station 95. View of restored temporary workspaces around the scrubbers on 3/25/2020. Facing northwest.