



March 31, 2016

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

Re: PennEast Pipeline Company, LLC, Docket No. CP15-558-000
Response to March 26, 2016 Letter of Ramapough Lenape Indian Nation and Mr.
Thomas Sommo

Dear Ms. Bose:

On March 26, 2016, counsel for the Ramapough Lenape Indian Nation (Ramapough) submitted a letter (March 26 Letter) to the Federal Energy Regulatory Commission (FERC or Commission) regarding PennEast Pipeline Company, LLC's (PennEast) February 22, 2016 filing in response to the Commission's February 10, 2016 Environmental Information Request in the above-referenced docket (February Data Response) for the PennEast Project (Project). PennEast hereby responds to Ramapough's March 26 Letter and provides additional clarification with respect to archaeological and architectural surveys and corresponding maps updated with the February Data Response.

The March 26 Letter incorrectly asserts that maps provided with the February Data Response suggest PennEast completed field surveys on land owned by Mr. Thomas Sommo. Contrary to this assertion, Appendix 4B (provided as Attachment 5, Part 1, to the February Data Response) provides the areas where PennEast has completed archaeological field surveys, and the map at page 25 showing the portion of the route along Mr. Sommo's property correctly indicates that the property remains "unsurveyed" for archaeological sites. Consistent with Appendix 4B, PennEast has not completed field surveys on Mr. Sommo's property.

Although the March 26 Letter does not state which materials that Ramapough believes suggest that field surveys were completed on Mr. Sommo's property, these assertions may have been based on a misreading of maps contained in Appendix 4C (provided as Attachment 5, Part 2, to the February Data Response), which address certain architectural surveys. In contrast to the status of surveys reflected in Appendix 4B, which are field surveys designed to identify archaeological resources along the Project route, PennEast performed certain architectural surveys reflected in Appendix 4C to assist it in identifying structures with potential eligibility for listing on the National Register of Historic Places (National Register). Because structures newer than 50 years of age are not ordinarily eligible for listing on the National Register, one method PennEast uses to identify potentially eligible sites is to examine publicly available information including tax parcel data, aerial images, and historic maps to determine whether properties contain structures over 50 years of age. The purple color coding in Appendix 4C: Architectural History Survey Coverage indicates properties where PennEast has either physically conducted field surveys (for those properties where access was granted) or used publicly available

information to preliminarily determine whether the property contains structures that are less than 50 years of age or are vacant, which would generally indicate the likelihood that the property is not potentially eligible for listing in the National Register.¹ The assertion in the March 26 Letter that PennEast is seeking to replace archeological field surveys with desktop reviews is incorrect, and PennEast reiterates its commitment to employ the research methods identified in Section 4.7.2.1 of Resource Report 4, including thorough pedestrian surveys.

The March 26 Letter also repeats arguments Ramapough raised in its October 9, 2015 request for consulting party status. Specifically, Ramapough desires PennEast to treat Ramapough as a consulting party and to disclose to Ramapough protected cultural resource information. The March 26 Letter incorrectly claims that it is a “violation of the FERC permitting process” to not provide cultural resources information to Ramapough. PennEast previously addressed these issues in its November 16, 2015 response to Ramapough filed in the above-referenced docket. Again, PennEast reiterates that it does not oppose Ramapough’s request for consulting party status. However, unless and until such status is granted by the Commission in this proceeding, PennEast does not have the authority to unilaterally release protected cultural resource surveys to Ramapough. Were the Commission to grant Ramapough consulting party status in this proceeding, PennEast would immediately begin sharing protected cultural resource surveys with Ramapough in accordance with FERC regulations.

Should you have any questions concerning this filing, please contact me at (610) 406-4322.

Sincerely,
/s/ Anthony C. Cox
Anthony C. Cox
PennEast Pipeline Company, LLC,
By its Project Manager
UGI Energy Services, LLC

cc: Medha Kochhar (FERC)
All Parties of Record

¹ The clarification provided herein similarly addresses issues raised in the letter filed on March 8, 2016 in the above-referenced docket by counsel for Susanna Bullrich regarding her property at milepost 45.5. Ms. Bullrich’s March 8, 2016 letter specifically references “Attachment 5, Part 2, Architectural History Survey Coverage” for which publicly available information was used to aid in the identification of properties with potential eligibility for listing on the National Register.