

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 3:01 PM
To: corridoreisarchives,
Subject: Preliminary Draft Corridor Map Comment M0098

Attachments: Energy_Corridor_Preliminary_Map_Comments__ESBI__M0098.doc



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Thank you for your comment, Claire Moseley.

The comment tracking number that has been assigned to your comment is M0098. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 03:00:27PM CDT

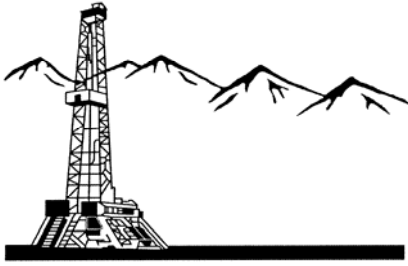
Preliminary Draft Corridor Map Comment: M0098

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Privacy Preference: Don't withhold name or address from public record
Attachment:
/Users/elizabethshepard/Desktop/Energy_Corridor_Preliminary_Map_Comments__ESBI__.doc

Comment Submitted:

Attached are comments from Public Lands Advocacy and the Petroleum Association of Wyoming regarding the preliminary Energy Corridor Maps

Questions about submitting comments over the Web? Contact us at:
coridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at
(630)252-6182.



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July 10, 2006

Ms. Julia Souder
U.S. Department of Energy
Office of Electricity Delivery and Energy Reliability
1000 Independence Avenue, S.W., Room 8H-033
Washington, DC 20585

RE: West-wide Energy Corridor PEIS - Preliminary Maps

Dear Ms. Souder:

On behalf of Public Lands Advocacy (PLA) and the Petroleum Association of Wyoming (PAW), following are comments on the West-wide Energy Corridor Preliminary Maps. PLA is a nonprofit trade association whose members include independent and major oil and gas producers as well as nonprofit trade and professional organizations that have joined together to foster environmentally sound exploration and production on public lands. PAW is Wyoming's largest and oldest oil and gas trade organization, whose members account for over ninety percent of the natural gas and over eighty percent of the crude oil produced in the State. As you are aware, we strongly support the designation of energy corridors across the western United States. However, without careful consideration of all relevant right-of-way (ROW) needs, this project could have a significant detrimental impact on the oil and gas industry's ability to provide much needed oil and gas resources to the American consumer. Therefore we strongly urge you to carefully consider the comments provided below. You will note that we have reiterated several comments provided in our earlier scoping letter.

Maps

We appreciate that DOE has posted maps of the preliminary corridor routes. However, while these maps provide more information than was available previously, they do not contain township and range designations, which makes it difficult to determine their exact location. Not only is this information important to the energy industry in its efforts to analyze their potential compatibility with other ROW requirements, it also leaves the door open to criticism from project opponents who take advantage of every opportunity to oppose energy corridor designations. As such, while this additional information is helpful, more specific maps are necessary to assuage opponents concerns as well as to aid users to evaluate their utility for current and future projects.

Multiple Uses

We appreciate the clarification that corridor designations are intended to help accommodate multiple pipelines (such as for oil, gas, or hydrogen), as well as electricity transmission lines, and related infrastructure, such as access and maintenance roads, compressors, pumping

stations, and other structures. However, it appears the primary focus of the corridor project remains upon needs for electrical transmission lines. We cannot stress enough that these corridors must accommodate a variety of row uses. Careful attention to the needs of the energy industry is required in Section 368 of the Energy Policy Act, which directs the team to establish the means to “*expedite applications to construct or modify oil, gas and hydrogen pipelines and electricity transmission and distribution facilities within such corridors.*” Clearly the intent of Congress is to make corridors accessible to energy companies.

Industry has gone to great lengths to cooperate with other industry members in utilizing common corridors, and it also participates with the transportation industry (railroads, interstate highways, state highways, county roads, BLM access roads) to minimize both the impacts and the number of corridors. Therefore, we urge the PEIS team to incorporate current ROW practices developed by the oil and gas industry designed to be compatible with other uses, such as electrical power lines, into the proposed mix of corridors.

Utilization of existing corridors can be facilitated by the development of specific criteria outlining the types of facilities that can be accommodated within these existing routes. Specifically, determinations as to size, capacity, location, function as well as workspace and safety precautions must be examined in order to set standards for selecting the types of facilities that may be compatible in a given corridor. Such determinations are necessary because not all corridor uses are compatible. For example, high voltage electricity transmission lines can induce currents in pipelines, interfering with cathodic protection systems that protect pipelines from corrosion. An additional concern is that the weight of transmission line service vehicles can damage pipelines if not managed properly.

Avoidance of Limitations outside Designated Corridors

Of critical importance is that future transportation activities not be limited to energy corridors designated through this programmatic EIS. We recognize the team is charged with considering existing corridors and proposed projects in the current analysis; however, designation of specific energy corridors must not result in restricted development of new corridors and projects in the future. Such considerations must be an important component of the project since it is impossible to predict where future energy development will occur and what future routes will be required. Therefore, unknown future uses must be provided for in the analysis and decision record. This will allow future needs not yet known to proceed without delay, which is vital to supporting a healthy domestic energy program.

Conclusion

We appreciate this opportunity to provide you with our views and concerns. Please do not hesitate to contact either of us if you have questions or would like to discuss our comments in greater detail.

Sincerely,

Claire Moseley

Claire M. Moseley
Executive Director
Public Lands Advocacy

John Robitaille

John Robitaille
Vice President
Petroleum Association of Wyoming