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November 28, 2005

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585
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Re: Energy Corridor PEIS

To Whom It May Concern:

On behalf of Questar Pipeline Company and Questar Gas Company (Questar), I am submitting these scoping comments for the development of the West-wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). Questar Pipeline Company owns and operates approximately 2,500 miles of natural-gas transmission pipelines in Arizona, California, Colorado, New Mexico, Utah, and Wyoming. Questar Gas Company owns and operates retail natural-gas distribution systems in Idaho, Utah and Wyoming, serving more than 800,000 customers. All of these facilities are located within states covered by the PEIS. As such, Questar has a large stake in the outcome of the PEIS.

Questar recognizes that the PEIS (Section 368 of the Energy Policy Act of 2005) generally directs Federal Land Management agencies (FLMs) to expedite the designation of energy corridors on federal lands in the eleven western states. Questar endorses this action and supports the PEIS comments submitted by the Western Business Roundtable. However, there are specific environmental, safety and construction compatibility limitations with co-locating facilities in the same energy corridor that have not been adequately addressed by the industry groups. As a result, Questar would suggest that the FLMs broaden the definition of energy corridor.

Definition of an Energy Corridor

A PEIS summary sheet was distributed at a public scoping meeting that provided an overview of the mandate for the PEIS (Section 368 of the Energy Policy Act of 2005) and a definition of an energy corridor. The summary sheet stated:

“For purposes of preparing the West-wide Energy Corridor PEIS, an energy corridor is defined as a parcel of land (often linear in character) that has been identified through the land use planning process as being a *preferred* (italics added) location for existing and future utility right-of-ways...”

Questar notes that Section 368 of the Energy Policy act does *not* state that designated energy corridors are the *preferred* location for future energy-related rights-of-way (as stated in the quote above.) Indicating which energy corridors are preferred implies that the FLMs may select designated energy corridors for a project's route without giving full consideration to other project-specific factors during the environmental analysis. For example, the total project length (and associated ground disturbance) may increase when required to connect

with corridors, resulting in increased costs, increased time to construct and increased environmental impacts. Questar suggests that designated energy corridors are not categorically defined in the PEIS as the preferred location for future utility rights-of-way.

Designation of Energy Corridors

Questar suggests inclusion of all "Existing," "Proposed," and "Agency Designated" Corridors identified in the Western Utility Group's 1992 Western Regional Corridor Study as designated energy corridors. In addition to these corridors, Questar recommends inclusion of all existing transportation and energy rights-of-way as designated energy corridors. This would ensure that all energy rights-of-way that have been established since the Western Regional Corridor Study was published are included, providing more options for locating future energy rights-of-way in designated energy corridors. Existing energy rights-of-way that contain just one pipeline should be designated as energy corridors as well, allowing for the operational benefits provided by looping (installing another pipeline adjacent to an existing pipeline).

In addition to designating specific energy corridors, Questar recommends that the PEIS (and relevant agency land use and resource management plans, or equivalent plans) also contain language to allow the flexibility to add new energy corridors after the final PEIS has been published so that future energy supplies can be connected with markets.

Specifications of a Corridor

Section 368 of the Energy Policy Act of 2005 states:

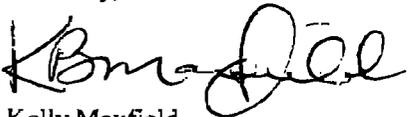
"A corridor designated under this section shall, at a minimum, specify the centerline, width, and compatible uses of the corridor."

In some cases, powerline rights-of-way are incompatible with pipeline corridors. Steep terrain, sensitive resources, and induction of electrical current all may prevent joint corridor use. Questar suggests that language in the PEIS (and relevant agency land use and resource management plans, or equivalent plans) state that future rights-of-way generally follow the specified centerline of designated corridors, but also recognize that deviations from the centerline may be necessary due to terrain, geology, sensitive resources, non-federal landowner preferences, and other factors.

Questar also suggests that the width of designated corridors be specified as an *approximate* width in order to provide greatest flexibility of use for designated corridors. This could address some of the incompatibilities discussed above. Finally, Questar recommends that the PEIS (and any agency land use and resource management plans, or equivalent plan) should not specify a maximum limit to the number of energy rights-of-way that a designated corridor can accommodate. The number of energy rights-of-way within a designated corridor should instead be determined by physical conditions of the corridor (terrain, structures, etc.)

Thank you for this opportunity to provide these comments.

Sincerely,



Kelly Maxfield
V.P., IT and Administrative Services