

Sykes, Robbie

From: Pelren, David
Sent: Friday, August 26, 2022 10:53 AM
To: Sykes, Robbie
Subject: FW: [EXTERNAL] Ridgeline Pipeline-Additional In Water Boring Coordination
Attachments: 20220819_USFWS_Inwaterboring_Ridgeline (WB11 WB12 and WB13).pdf

Robbie, I'll plan to work up a draft response to this (possibly a NLAA stamp).

-Dave

From: Adams, Joshua <Joshua.Adams@stantec.com>
Sent: Monday, August 22, 2022 8:52 AM
To: Pelren, David <david_pelren@fws.gov>
Cc: Casey, Justin <Justin.Casey@stantec.com>; Benefiel, Jeffrey <Jeff.Benefiel@stantec.com>; Haider, Jessica <Jess.Haider@stantec.com>
Subject: [EXTERNAL] Ridgeline Pipeline-Additional In Water Boring Coordination

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Good morning Dave,

I hope you had a great weekend. I have attached a letter for your review for a few additional in water boring locations. As with the others, these are for planning purposes.

Let me know if you have any questions.

Thanks

Josh Adams

Natural Resource Team Lead, Terrestrial Wildlife Technical Lead, Principal

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Stantec Consulting Services Inc.
601 Grassmere Park, Suite 22
Nashville, Tennessee 37211

August 19, 2022

Project/File: 172677408

Dave Pelren
USFWS Cookeville Field Office
446 Neal St.
Cookeville, TN 38501

Dear Mr. Pelren,

Reference: In-water Geotechnical Borings for the Ridgeline Expansion Project HDD Planning

As discussed in a meeting on April 19, 2022, Stantec is in the process of coordinating exploratory geotechnical borings for East Tennessee Natural Gas at multiple in-water locations along the proposed pipeline route (Attachment 1). Nine geotechnical borings were included in consultation letters previously sent on June 10 and July 13, 2022, with concurrence received on June 22 and August 3, 2022, respectively. This letter is regarding three additional boring locations, WB-11, WB-12, and WB-13. As previously stated, the purpose of these borings is to aid in the planning and design of the horizontal directional drill (HDD) bores that will likely be necessary to install the new pipeline under these larger waterbody crossings. This request is only pertaining to the geotechnical borings being conducted as part of the preliminary survey and planning work and not the actual HDD construction of the pipeline.

An Information for Planning and Coordination (IPaC) database search of the three additional locations indicated that protected species may be present in these waterbodies. A USACE Section 404 permit is required for the proposed borings, and therefore, we are requesting technical assistance from your office regarding potential impacts to federally listed species. Table 1 lists the locations of the proposed borings, and Attachment 1 presents the locations of the borings.

Table 1. Location and USFWS IPaC Number of Proposed In-water Borings.

Boring ID	USFWS IPaC Number	Latitude	Longitude
WB-11	2022-0076020	35.967284	-84.466737
WB-12	2022-0076032	36.380733	-86.203923
WB-13	2022-0076035	36.334162	-85.795949

In-water activities at each of these sites will include a self-powered spud barge anchored to the stream bed using two six-inch diameter drill casings. A separate four-inch casing will be used to advance the soil boring. Boring depths will be determined by the soil stratas encountered during the advancements; however, the geotechnical contractor estimates the boring depths to be approximately 160 feet below the river bottom. No additional stream bed or in-water disturbance is proposed.

Reference: In-water Geotechnical Borings for Ridgeline Expansion Project HDD Planning

The proposed geotechnical borings will be conducted in accordance with applicable federal and state regulations, including but not limited to the Clean Water Act, Endangered Species Act, and National Historic Preservation Act. Disturbance of the waterbody substrate will be limited to the extent practicable to execute the borings to minimize any potential, localized turbidity. Any localized increase in turbidity would be temporary, minimal, and dissipate rapidly once drilling is completed.

Drilling crews will implement best management practices (BMPs) to minimize the potential for environmental impacts including any potential impacts to federally listed species. The BMPs include practices to contain fuels and lubricants and methods to respond to an accidental release. Fuel and lubricant storage will have secondary containment such as metal or plastic-lined containment structures. Drilling crews will implement methods to minimize the accumulation of fuels and lubricants on the barge decks and will implement measures to keep rainwater separated from contact with stored fuels and lubricants. Methods and devices will be implemented to separate fuels and lubricants from bilge water. All vessels will have spill containment kits that include absorbent towels and absorbent booms. Should a release occur, drilling crews and support vessels will deploy necessary materials from onboard spill kits to contain any release. Reporting guidelines for a petroleum release will be followed, and necessary notifications to U.S. Coast Guard and the National Response Center will occur in a timely manner. Barge deck loading will be limited to the safe capacity of the barge. Loads will be secured and holdbacks or rings will be provided to secure loose equipment during rough weather and transport. This will help minimize the potential for any releases from the drilling barges.

All proposed work will occur within the stream channels, so no effects are anticipated to any listed terrestrial species. In addition, in-water impacts will be limited to small areas, and the drilling contractor will implement the BMPs above. It is our opinion that potential impacts to listed aquatic species are minimal, and therefore, we are requesting your concurrence with our determination that the boring activities at these locations may affect but are not likely to adversely affect listed aquatic species.

If you have any questions or need additional information, please do not hesitate to reach out to me.

Sincerely,

STANTEC CONSULTING SERVICES INC.



Joshua Adams

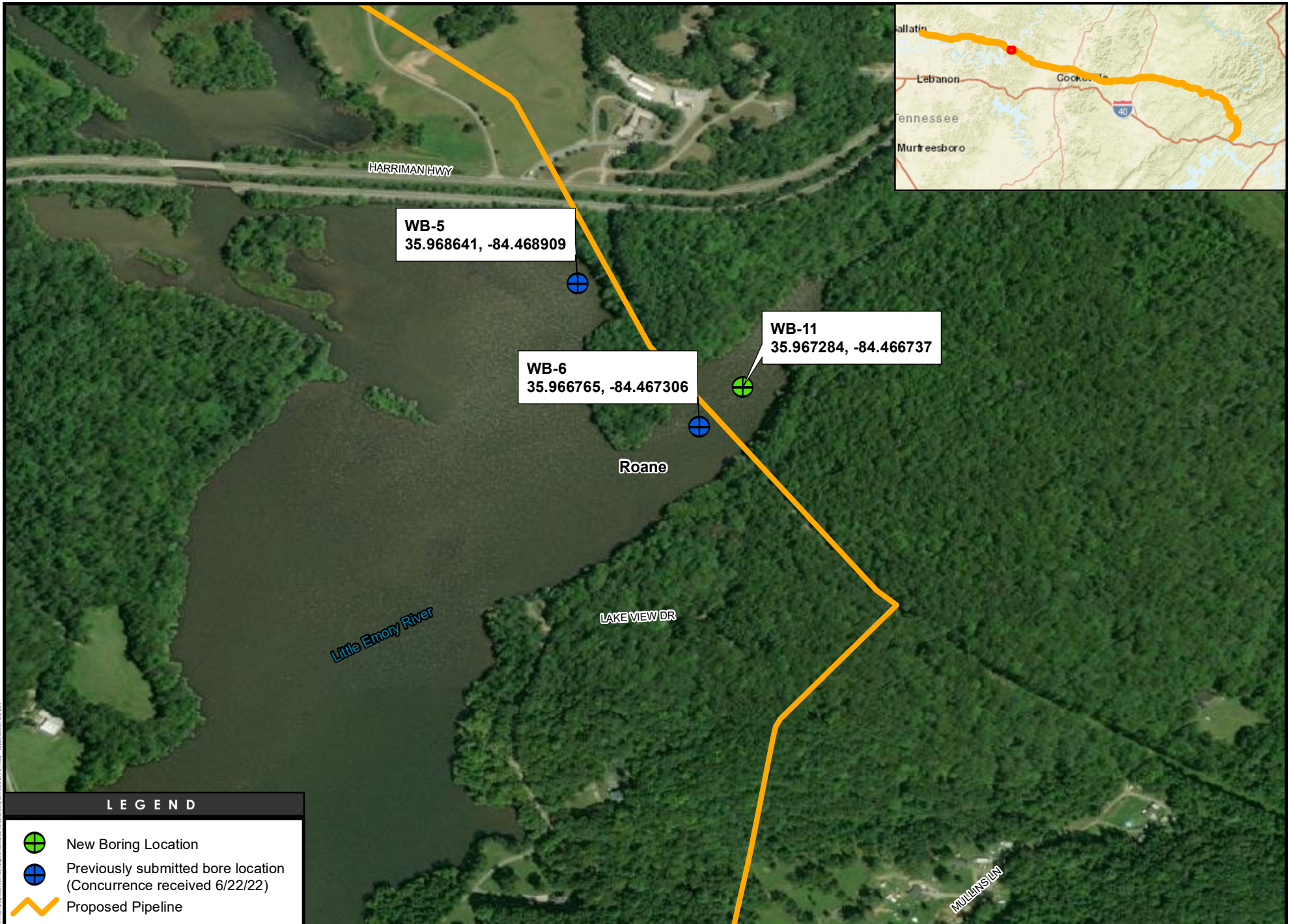
Principal

Phone: 502-212-5011




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Attachment: Attachment 1 Boring Location Map



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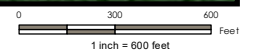
-  New Boring Location
-  Previously submitted bore location (Concurrence received 6/22/22)
-  Proposed Pipeline



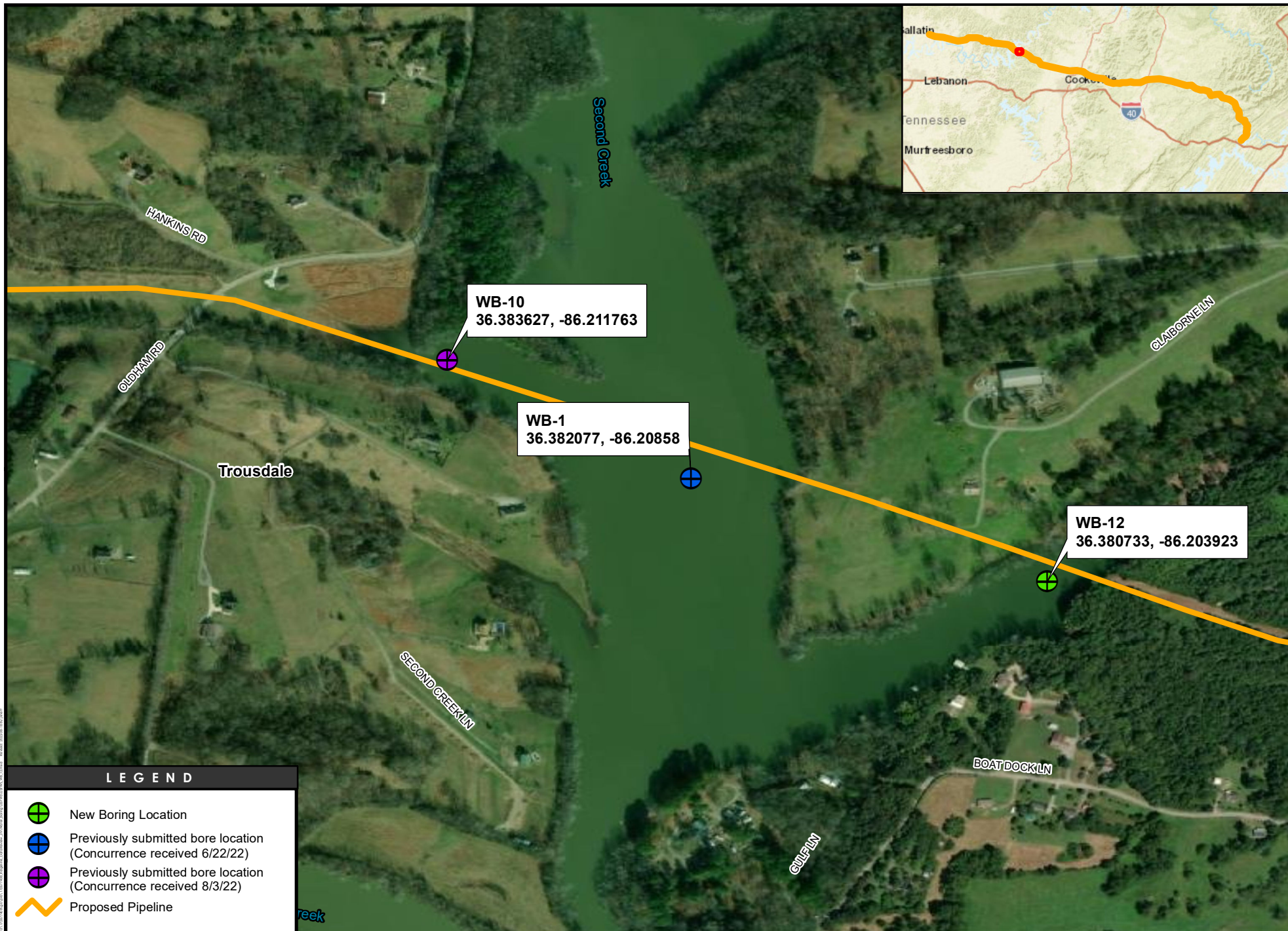
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1. Coordinate System: GCS North American 1983
2. Source Data: US National Map
3. Image: GIS/MapSource

Ridgeline Expansion Project – Geotechnical Investigation In-water Boring Locations August 2022

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Prepared by: X.X.X 08/18/22
Technical Review by: X.X.X MM/DD/YY
Independent Review by: X.X.X MM/DD/YY



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New Boring Location

Previously submitted bore location
(Concurrence received 6/22/22)

Previously submitted bore location
(Concurrence received 8/3/22)

Proposed Pipeline





Ridgeline Expansion Project – Geotechnical Investigation

In-water Boring Locations

August 2022



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-  New Boring Location
-  Previously submitted bore location (Concurrence received 8/3/22)
-  Approximate HDD Alternative Route
-  Proposed Pipeline

