Constitution Pipeline Company, LLC
2800 Post Oak Boulevard (77056)
P.O. Box 1396
Houston, Texas 77251-1396

April 11, 2014

US Fish and Wildlife Service
New York Field Office
Attn: Timothy Sullivan
3817 Luker Road
Cortland, NY 13045

Subject: **Additional Information Request - Informal Consultation**
Federally Regulated Rare, Threatened and Endangered Species
Communication System Monopoles
Constitution Pipeline Company, LLC
Constitution Pipeline
Susquehanna County - Pennsylvania
Broome, Chenango, Delaware and Schoharie Counties - New York

Dear Mr. Sullivan,

The Constitution Pipeline Company, LLC. (Constitution) is requesting informal consultation from the US Fish and Wildlife Service (USFWS) for a newly proposed communications system associated with the Constitution Pipeline. The Constitution Pipeline is a new interstate natural gas pipeline that will be designed to transport 650,000 dekatherms per day of natural gas from three receipt points located in Susquehanna County, Pennsylvania, north and east to points of interconnection with the existing Iroquois Gas Transmission System at their Wright Compressor Station in Schoharie County, New York (Project). The Project includes construction of approximately 124 miles of new 30-inch diameter pipeline; two meter stations; Main Line Valves (MLVs), piping; and appurtenant facilities.

Constitution has identified a need for a radio communication system that will enable continuous radio connectivity throughout the entire 124-mile Project. A VHF or UHF radio communication system will prove vital to maintain communication between operations personnel. The radio communication system will be used during operation, maintenance, pipeline integrity and safety inspections, pipeline repair, and during emergency situations if the need occurs. In the event that the primary (DSL) and secondary (Cellular) modes of supervisory control and data acquisition (SCADA) communication at these facilities fail during emergency situations, such as during inclement weather, Williams may be required to perform manual operation of these facilities to maintain the integrity of the pipeline infrastructure. The ability to perform manual operations should not depend on modes of communication that may be out of service during these situations. This reasoning is in accord with Williams' firm commitment to ensure the safety of the public, public and private property, and Williams personnel at all times. A drawing depicting a typical communication monopole is located in Attachment 1.

To accomplish the continuous radio signal connectivity, Constitution will erect eleven, approximately 100-foot high monopoles, each with antennas installed on the side, near the top of the pole. A lightning rod

will be located on the top of the pole. The monopoles will be sited at above ground facilities that have previously been proposed for the Project. These locations occur at the Turnpike Road Meter and Regulator (M&R) Station, the Westfall Road M&R Station, and each of the nine proposed MLV locations. Table 1 identifies the approximate milepost of each aboveground facility. Associated construction and operation workspaces required to install and maintain the monopoles will be located wholly within the aboveground facility areas currently identified for earth and maintenance disturbances in prior submittals.

Table 1 Proposed Aboveground Facilities Where Monopoles will be Located

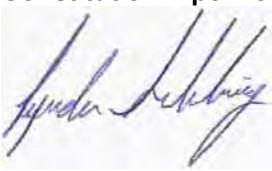
Facility ID	Milepost [a]	Township	County	State
Turnpike Road M&R Receipt Station	0.00	Brooklyn	Susquehanna	PA
MLV #2 Walkers Rd	15.15	Jackson	Susquehanna	PA
MLV #3 Vale Road	26.72	Sanford	Broome	NY
MLV #4 Obrien Road	41.24	Sanford	Broome	NY
MLV #5 Access Rd/Town Road	52.13	Masonville	Delaware	NY
MLV #6 Stewart Road	66.74	Franklin	Delaware	NY
MLV #7 County Road 10	81.77	Davenport	Delaware	NY
MLV #8 Clapper Hollow Road	95.05	Summit	Schoharie	NY
MLV #9 Access Rd/Dodge Lodge Road	108.52	Richmondville	Schoharie	NY
MLV #10 Smith Road	119.61	Schoharie	Schoharie	NY
Westfall Road M&R Delivery Station	124.44	Wright	Schoharie	NY

[a] Mileposts Associated with FERC November 12 Supplemental Filing.

With respect to federally-listed rare species, the proposed location of the monopoles are within areas covered by previous consultation with USFWS and do not require additional review as part of this request. However, as part of the FERC National Environmental Policy Act (NEPA) review and consultation with your office, Constitution requests a review of potential impacts to migratory birds and their habitats under the Migratory Bird Treaty Act of 1973, as amended (16 U.S.C §§ 703 *et seq*.) and the Bald and Golden Eagle Protection Act of 1940, as amended (16 U.S.C §§ 668 *et seq*.).

Should you have any questions regarding this request, please do not hesitate to contact me at 713-215-2491 or via email at Lynda.schubring@Williams.com. Thank you for your consideration.

Sincerely,
Constitution Pipeline Company, LLC



Lynda Schubring
Senior Environmental Scientist

cc: Ms. Jennifer Siani – USFWS – Pennsylvania Field Office
Mr. Kevin Bowman - FERC

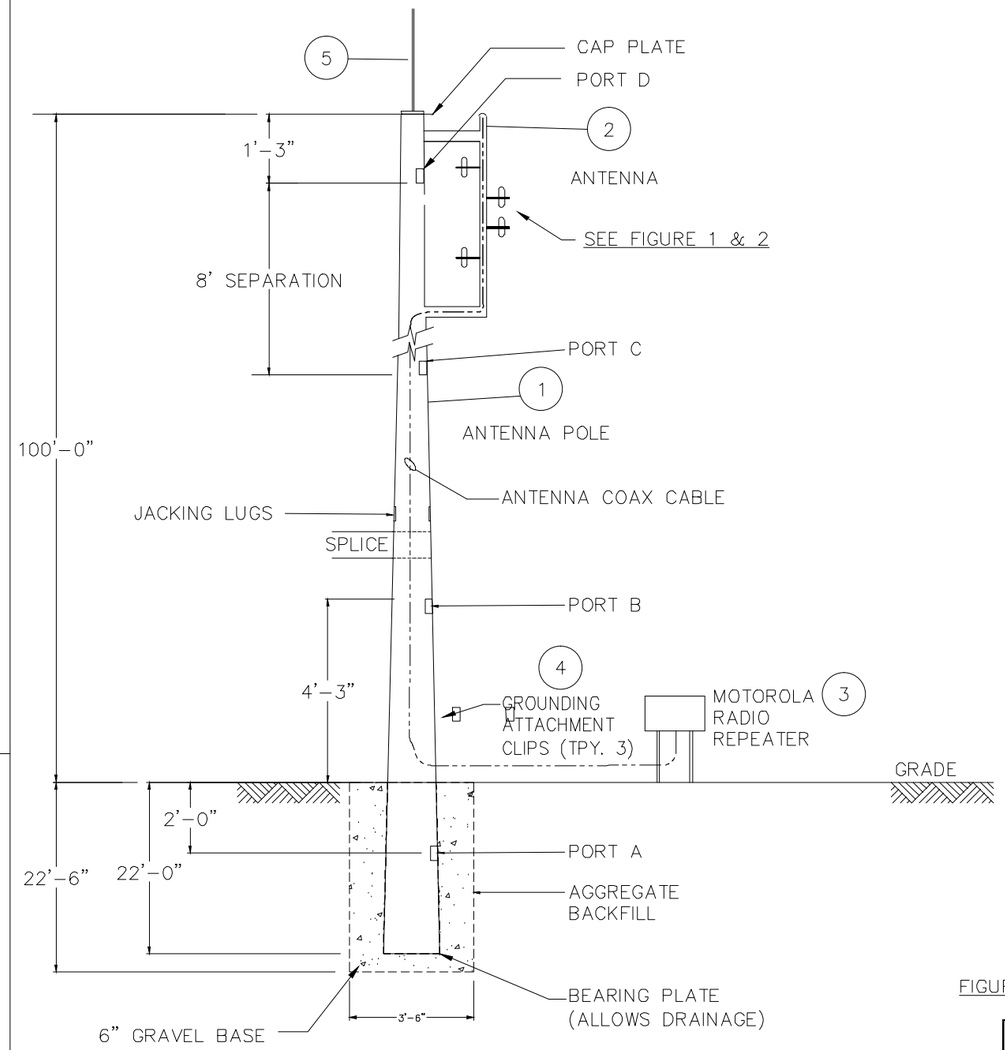
Attachment: Attachment 1 - Typical Radio Communication Monopole Detail

CONSTITUTION PIPELINE

TYPICAL DRAWING

RADIO COMMUNICATION MONOPOLE

March 2014



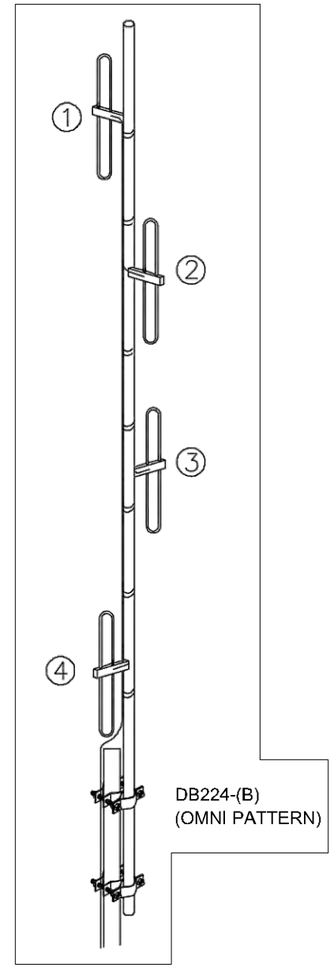


FIGURE 1. ANTENNA DIPOLE ALIGNMENT

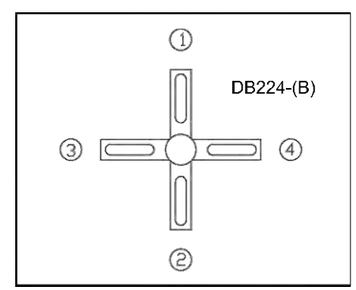
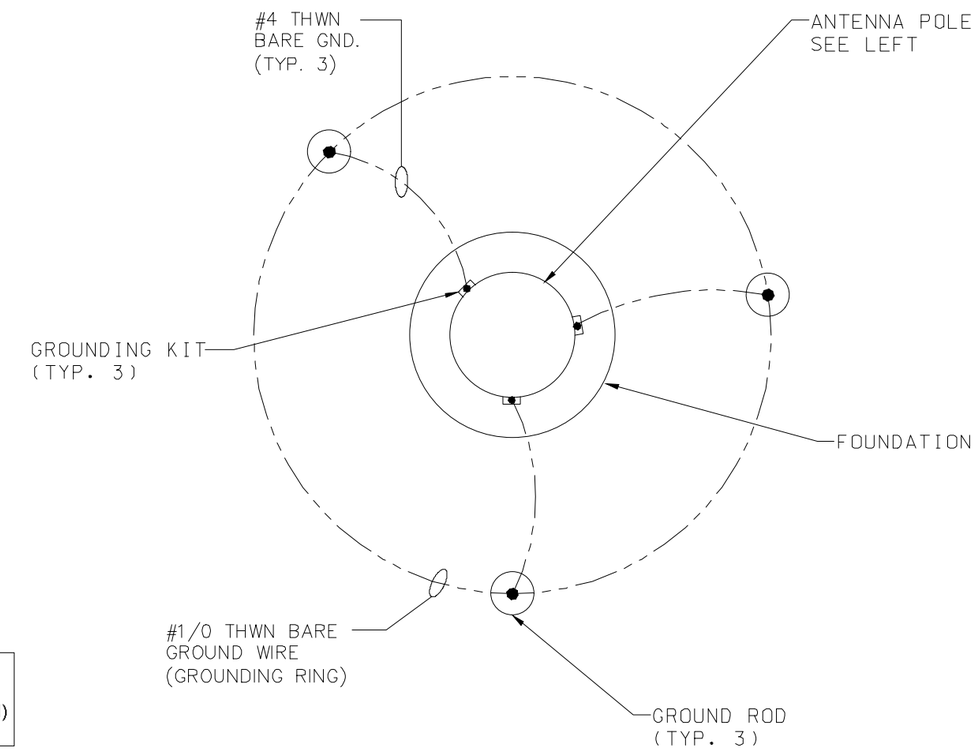


FIGURE 2. ANTENNA DIPOLE ALIGNMENT



DETAIL "G35A"

TYPICAL RADIO COMMUNICATIONS MONOPOLE

NOTES:

1. EQUIVALENT BOLTED BASE PLATE MONOPOLE ON PAD AND PIER FOUNDATION MAY BE USED IF REQUIRED BY SOIL CONDITIONS.

ITEM	DESCRIPTION	COMMODITY NO.	G35 QTY
1	ANTENNA POLE, ROHN #DEP100HA		1
2	ANTENNA, OMNI PATTERN, DECIBEL PRODUCTS #DB224-B		1
3	MOTOROLA RADIO REPEATER		1
4	GROUNDING KIT, ROHN #BGK5GGX		3
5	LIGHTNING ROD, ROHN #LRCL		1

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FOR INFORMATION PURPOSES ONLY
03/21/14

GULF INTERSTATE ENGINEERING
HOUSTON, TEXAS

REFERENCE DRAWINGS		REVISIONS						
DRAWING NO.	TITLE	NO.	DATE	BY	DESCRIPTION	W.O. NO.	CHK.	APP.
–	–	A	03/21/14	JJG	ISSUE TO FERC	1110415	BL	BD

CONSTITUTION PIPELINE COMPANY, LLC.
TYPICAL DRAWING
RADIO COMMUNICATION MONOPOLE

DRAWN BY: JJG	DATE: 03/12/14	ISSUED FOR BID:	SCALE: NONE
CHECKED BY: BL	DATE: 03/12/14	ISSUED FOR CONSTRUCTION:	
APPROVED BY: BAD	DATE: 03/12/14	DRAWING NUMBER: TYPICAL-RADIO COMMUNICATION MONOPOLE	SHEET 1 OF 1
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