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

April 28, 2014

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

Subject: **Draft Migratory Bird and Upland Forest Plan**
Constitution Pipeline Company, LLC
Constitution Pipeline
Susquehanna County - Pennsylvania
Broome, Chenango, Delaware and Schoharie Counties - New York

Dear Mr. Sullivan,

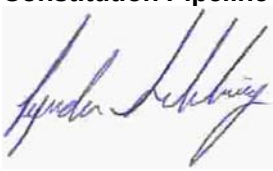
The Constitution Pipeline Company, LLC. (Constitution) is submitting the attached Draft Migratory Bird and Upland Forest Plan (Plan) for your review and comment. The Plan, originally under development to address potential impacts of the Constitution Pipeline (Project) on migratory birds, was requested by the Federal Energy Regulatory Commission (FERC) as part of its environmental review of the Project. The current Plan now addresses Project-related impacts to upland forested areas and associated migratory bird habitat crossed by the Project and reflects the discussion between the U.S. Fish and Wildlife Service (USFWS) and Constitution from the April 9, 2014 meeting in Cortland, New York.

As part of the analysis that went into the development of the Plan, Constitution evaluated the potential for further reducing the width of the construction workspace and/or reducing the width of the permanently maintained easement in an attempt to minimize the Project-related impacts on upland forest. Based on the potential safety and operational concerns, these measures were determined to be infeasible. Additionally, Constitution evaluated replanting the temporary workspace areas within interior forests to promote re-establishment of the forest covery type; however this would not eliminate the edge effect associated with the new easement and would not significantly improve the migratory bird habitat.

As a result of this analysis, Constitution has determined that preservation of upland forest and associated migratory bird habitat will provide the most effective compensation for the Project-related impacts on these resources. The attached Plan provides detailed information on Constitution's valuation of the upland forest areas and migratory bird habitats crossed by the Project. Additionally, the Plan provides Constitution's proposed upland forest minimization measures and preservation activities to ensure that the Project results in a net-benefit to the resources.

Should you have any questions regarding the enclosed Plan or wish to have a meeting to specifically discuss the Plan, please do not hesitate to contact me at 713-215-2491 or via email at Lynda.schubring@Williams.com. Thank you for your continued consideration.

Sincerely,
Constitution Pipeline Company, LLC



Lynda Schubring
Senior Environmental Scientist

cc: Ms. Jennifer Siani – USFWS – Pennsylvania Field Office
Ms. Corrie Laughlin – Pennsylvania Game Commission Ecological Services Section
Ms. Ellen Shultzabarger - Pennsylvania Department of Conservation and Natural Resources - Bureau of Forestry - Division Chief
Mr. Stephen Tomasik - NYSDEC

Attachment: Migratory Bird and Upland Forest Plan