

UNITED STATES OF AMERICA

BEFORE THE

FEDERAL ENERGY REGULATORY COMMISSION

PennEast Pipeline Company, LLC) **Docket No. CP15-558-000**
Garden State Expansion Project)

MOTION FOR LEAVE TO INTERVENE

Pursuant to Rules 212 and 214 of the Federal Energy Regulatory Commission's ("Commission") Rules of Practice and Procedure, 18 C.F.R. § 385.212 and 385.214 (2007), the Township of Lawrence ("Township" or "Lawrence"), a municipal corporation of the State of New Jersey located in Mercer County, files this motion to intervene in this proceeding.

On or about September 24, 2015, the PennEast Pipeline Company, LLC ("PennEast") filed its application under §7 of the Natural Gas Act, 15 U.S.C. § 717f, and §157 of FERC's regulations, 18 C.F.R. § 157.1 *et seq.*, for the proposed PennEast Project, FERC Docket No. CP15-558-000.

I. COMMUNICATIONS AND SERVICES

All communications, pleadings, and orders with respect to this proceeding should be sent to the following individual:

Jennifer L. Cordes, Esq.
Eckert Seamans Cherin & Mellott, LLC
2000 Lenox Drive
Suite 203
Lawrenceville, New Jersey 08648

II. INTEREST OF PETITIONER

The Township has standing to intervene as an interested party on behalf of the citizens of Lawrence Township who are, or may be affected by the proposed pipeline either directly in the event of co-location or indirectly by virtue of Lawrence's proximity to the proposed new pipeline location that falls within the adjacent Township of Hopewell. (The proposed PennEast Pipeline would traverse 9.62 linear miles of Hopewell Township and would terminate in Hopewell Township at PennEast's proposed connection with the Transco Pipeline.)

Lawrence also has standing to intervene because it is directly affected by the proposed pipeline. Transco Compressor Station 205 is located at 315 Cold Soil Road, said property also being known as Block 7201 Lot 17.01 on the Tax Map of the Township of Lawrence, and is expected to receive product from the proposed PennEast Pipeline. Questions regarding the need to expand the pump station given the proposed connection to existing lines which flow to the pump station are also of concern to the Township.

It is expected that environmental, safety, and other quality of life issues caused by the proposed pipeline will negatively impact the citizens of Lawrence. Further, as residents and taxpayers within Mercer County and the State of New Jersey, they have contributed to the funds expended to preserve and create open space and preservation lands by the County and State, and will thereby be impacted by the pipeline's negative impact on such open space and preserved lands, including their use and enjoyment of same.

It is in the public interest that the Township seeks to take part in this proceeding.

20151028 0152 PERS FOR (0101101017 10/28/2015 10:55:21 AM)

III. CONCLUSION

Wherefore, the Township of Lawrence respectfully requests that the Commission grant its Motion to Intervene as a party with full rights to participate in all further proceedings.

Respectfully submitted,

Dated: October 28, 2015

/s/ Jennifer L. Cordes
Jennifer L. Cordes, Esq.
Eckert Seamans Cherin & Mellott, LLC
2000 Lenox Drive
Suite 203
Lawrenceville, NJ 08648
Telephone: 609-989-5027
Fax: 609-392-7956
jcordes@eckertseamans.com

Document Content(s)

MOTION TO INTERVENE (R0303559).PDF.....1-3