



c/o Delaware River Greenway Partnership (DRGP)  
PO Box 15, Stockton, NJ 08559  
[www.lowerdelawarewildandscenic.org](http://www.lowerdelawarewildandscenic.org)

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**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Docket No. CP20-47-000  
PennEast Pipeline Company, LLC          PennEast Pipeline 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), members of the Lower Delaware Wild and Scenic River Management Council file this motion to intervene in this proceeding.

On 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 Pipeline Project, FERC Docket No. CP15-558-000.

On February 1, 2019, the PennEast Pipeline Company, LLC, filed an application under section 7(c) of the Natural Gas Act, 15 U.S.C. § 717f, and § 157 of the Commissions' regulations to amend the certificate of public convenience and necessity and related authorizations issues by the Commission on January 19, 2018 in Docket No. CP15-558-000. This application proposes a series of changes to the Project route approved as conditioned in the Certificate Order, noticed in FERC Docket No. CP19-78-000.

On January 30, 2020, PennEast again filed an abbreviated application under section 7(c) of the Natural Gas Act, 15 U.S.C. § 717f, and § 157 of the Commissions' regulations to amend the certificate of public convenience and necessity and related authorizations issued by the Commission on January 19, 2018 in Docket No. CP15-558-000. In this application for amendment, PennEast proposes to construct and operate the Project in two phases, with the facilities proposed to be located in Pennsylvania through approximate milepost 68 of the Certificated Route, including new interconnection facilities in Pennsylvania, to be built first as Phase 1 of the Project.

March 3, 2020. LDW&S.

## **I. Communications and Service**

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

**Richard Dodds, Chairman**  
**Lower Delaware Wild and Scenic River Management Council**  
**c/o Delaware River Greenway Partnership (DRGP)**  
**PO Box 15, Stockton, NJ 08559**  
[maryann@delawarerivergp.org](mailto:maryann@delawarerivergp.org)

## **II. Interest of Petitioner**

The construction, operation and maintenance of the Pipeline may adversely impact the communities in the Lower Delaware Wild & Scenic corridor in both New Jersey and Pennsylvania.

As background, the National Wild and Scenic Rivers System was created by Congress in 1968 (Public Law 90-542; 16 U.S.C. 1271 et seq.) to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for the enjoyment of present and future generations. The Lower Delaware Wild and Scenic River Management Council, a part of the National Wild and Scenic Rivers System, focuses on the area of the Delaware River south of the Delaware Water Gap and north of Trenton.

The Lower Delaware Management Plan

(<https://www.lowerdelawarewildandscenic.org/resources/documents/lower-delaware-wild-and-scenic-management-plan>) requires the evaluation of projects that may impact the river corridor.

Therefore, this motion is submitted in continued opposition to the construction and future operation of the PennEast project due to anticipated irreversible environmental impacts affecting the health of the Delaware River and surrounding communities in Pennsylvania and New Jersey.

The Lower Delaware River is a national and regional treasure, under the protection of the National Park Service. Penn East has not provided complete information about the potential damage the project could cause to both the river mainstem and the many tributaries and wetlands it will bisect.

## **III. Conclusion**

Members of the Lower Delaware Wild and Scenic River Management Council respectfully request that the Commission grant our Motion to Intervene as a party with full rights to participate in all further proceedings.

Sincerely,

*RICHARD DODDS, Chairman*

Lower Delaware Wild and Scenic River Management Council

March 3, 2020. LDW&S.