

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

PennEast Pipeline Company, LLC

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Docket No. CP15-558-000

MOTION TO INTERVENE
ON THE APPLICATION AS SUBMITTED
BY THE APPALACHIAN MOUNTAIN CLUB

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 Appalachian Mountain Club ("AMC") files 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 Project ("Project"), FERC Docket No. CP15-558-000. PennEast states that the proposed Project is a new greenfield 114 mile long pipeline project with laterals.

COMMUNICATIONS AND SERVICE

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

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INTERESTS

The AMC, headquartered at 5 Joy St., Boston, MA 02108, is a private, non-profit organization whose mission is to "promote the protection, enjoyment, and understanding of the mountains, forests, waters, and trails of the Appalachian region". We encourage respect for the natural environment, provide research and leadership in its protection, offer recreational and educational programs and facilities for the enjoyment, and conduct hands-on trail and campsite stewardship throughout the northeast. Our 100,000 members, supporters, and advocates reside largely in the Northeast, including 5,000 members in our Delaware Valley Chapter. The Delaware Valley Chapter leads trip for both members and many non-members who visit the Delaware Valley region and its public lands, including the Appalachian National Scenic Trail on a regular basis to participate in outdoor recreational activities. Overall, AMC maintains over 1,800 miles of trail, including 350 miles of the Appalachian Trail.

The Appalachian National Scenic Trail (ANST, also known as the A.T.)—our nation's first and foremost national scenic trail—is a continuous, 2,179-mile footpath extending across 14 states from Maine to Georgia. Following passage of the National Trails System Act in 1968, federal and state agencies launched one of the most ambitious land conservation efforts in our nation's history—including the acquisition of more than 3,360 parcels of land and 190,000 acres. Today those efforts which have spanned 32 years, have formed a publicly owned greenway connecting six national parks, eight national forests, and more than 60 state parks, forests, and game-management units. Those lands are remarkable not only for their scenic qualities but also for their extraordinary diversity of natural and cultural resources. The project, as

proposed, would cross the ANST at mile 51.5, within the section of the A.T. that is maintained by the AMC, and could negatively impact the ANST corridor and the experience of ANST users.

AMC's Delaware Valley Chapter maintains the 15 miles of the Appalachian National Scenic Trail between Lehigh Gap and Wind Gap in Pennsylvania, including the Leroy Smith Shelter. AMC works in partnership with the National Park Service, Pennsylvania Game Commission, Keystone Trails Association and the Appalachian Trail Conservancy to maintain this section of the ANST. The Appalachian Trail Conservancy (ATC) is a private, nonprofit, educational organization founded in 1925 with responsibilities delegated by the National Park Service for management of the Appalachian National Scenic Trail, and the AMC is the designated maintaining organization of the ATC for the section of the ANST that would be impacted by the project. .

AMC submitted comments on the Project in pre-filing (Docket PF15-1-000) on February 27, 2015; May 19, 2015 and September 15, 2015 and maintains an interest in the topics raised in these submissions related to the route selection at the ANST crossing; impacts on other natural and recreational areas including parks and nature preserves; air pollution; climate change; and the National Environmental Policy Act process. It is in the public's interest that AMC takes part in this proceeding as a full participant.

STATEMENT OF POSITION

The AMC takes no position on the Project, though may take a position in the future as aligned with its interests. The AMC has a standing policy to view as highly problematic the use of recreationally and ecologically sensitive open space and public lands for infrastructure needs that are not congruent with the primary purposes for which these lands were set aside.

CONCLUSION

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

Respectfully submitted,



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