

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DPC/CB-1
Northwest Pipeline LLC
Docket No. CP15-8-000
§ 375.308(w)(4)

April 10, 2019

David J. Madsen
Director, Business Development & Regulatory Affairs
Northwest Pipeline LLC
295 Chipeta Way
Salt Lake City, Utah 84108

RE: Request for an Extension of Time

Dear Mr. Madsen:

On April 11, 2016, the Commission issued an order (April 2016 Order)¹ in Docket No. CP15-8-000 authorizing Northwest Pipeline LLC (Northwest) to construct and operate an approximately 3.1 mile, 24-inch-diameter pipeline lateral extending from Northwest's existing 30-inch-diameter mainline to a proposed delivery meter station and related facilities in Cowlitz County, Washington (Kalama Lateral). The Kalama Lateral would enable Northwest to provide up to 320,000 dekatherms (Dth) per day of firm transportation service to Northwest Innovation Works' (NWIW) proposed Methanol Plant in the Port of Kalama. Ordering paragraph (B)(2) of the April 2016 Order required Northwest to complete the authorized construction of the facilities and make them available for service within two years from the date of the order.

On March 9, 2018, Northwest filed a request for an extension of time to complete the Kalama Lateral Project. On April 11, 2018, the Commission granted an extension of time until and including April 11, 2019, to complete construction of the facilities authorized in the above referenced proceeding and make them available for service.

On February 28, 2019, Northwest filed a request for an extension of time to complete the Kalama Lateral Project until April 11, 2021. The start of construction of the

¹ *Northwest Pipeline LLC*, 155 FERC ¶ 61,026 (2016).

Kalama Lateral Project is linked to NWIW receiving the necessary permits and authorizations for the Methanol Plant. Because of the permitting delays experienced by NWIW, Northwest cannot begin construction of its jurisdictional facilities. Northwest states that the commencement of construction of its facilities is not anticipated earlier than the second quarter of 2020 due to the ongoing supplemental environmental impact statement (SEIS) process² and finalization of the necessary Methanol Plant permits and authorizations.

On March 8, 2019, Cowlitz County Cemetery District #6 (Cemetery) filed comments (March 8 Comments) concerning Northwest's request for extension of time. Specifically, Cemetery states that because there is no progress in the actual construction of the Kalama Lateral facilities and NWIW remains without the necessary permits for its Methanol Plant, the Commission should deny the extension of time request. Cemetery further states that Northwest's certificate issued in April 2016 Order should be revoked, because the information and materials upon which the Commission granted initial approval of the project are outdated and stale. Cemetery stresses that Mount Pleasant Cemetery that was added to the Washington Heritage Register after the April 2016 Order qualifies for protection under section 106 under National Historic recognition.

On March 13, 2019, Northwest filed a reply to Cemetery's March 8 Comments. Northwest emphasizes that the Mount Pleasant Cemetery was recognized as a sensitive cultural resource and the Kalama Lateral Project was routed to avoid impact to the Mount Pleasant Cemetery. Northwest has included Mount Pleasant Cemetery in its cultural resources report that was filed with the Commission on October 27, 2014 as part of Northwest's application. Furthermore, extensive discussion of the Mount Pleasant Cemetery was included in the environmental analysis prepared for the Kalama Lateral Project.³ Northwest also states that on October 3, 2016, The Washington State Historic Preservation Office transmitted a letter to Northwest concurring with a determination of No Historic Properties Affected.

At this point in this proceeding the delay in the permitting of the NWIW facility and the subsequent delay in the construction of the Kalama Lateral is not sufficient reason for Northwest's certificate to be revoked nor to deny a reasonable extension of

² Northwest explains that on July 12, 2018, the Cowlitz County Superior Court ordered the restoration of the Permits authorizing construction of the Methanol Plant, subject to review by the Cowlitz County and the state Department of Ecology of a greenhouse gas focused SEIS. On November 13, 2018 the draft of the SEIS was issued, with comments due December 28, 2018. The final SEIS has yet to be issued.

³ Northwest Pipeline LLC, Docket No. CP15-8-000, *Kalama Lateral Project Environment Assessment* issued July 13, 2015.

time to allow local actions to proceed. Further, the current records in this proceeding as detailed in Northwest's proposal for the route of the Kalama Lateral to avoid impacts to the Cemetery and the discussion of the Cemetery in the Commission's Environmental Assessment serves to protect the sensitive historical nature of the Cemetery.

Based on the information presented in its February 28, 2019 request, Northwest is granted an extension of time for one year until and including April 11, 2020 to construct the Kalama Lateral and make it available for service. Any further extension beyond April 11, 2020 would require additional submissions by Northwest that local permit issues have been resolved and that their construction has begun or is imminent.

This action is taken pursuant to authority delegated by the Commission in 18 C.F.R. 375.308(w)(4).

Sincerely,

Richard Foley
Chief, Certificate Branch 1
Division of Pipeline Certificates
Office of Energy Projects

cc: Public File Docket No. CP15-8-000, All Parties.