

**FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426**

Office of Energy Projects

**GUIDANCE:
FERC STAFF NEPA PRE-FILING INVOLVEMENT
IN NATURAL GAS PROJECTS**

To encourage the pipeline industry to engage in early project-development involvement with the public and agencies, as contemplated by the National Environmental Policy Act (NEPA) and the Council on Environmental Quality regulations, the staff is offering the option of NEPA pre-filing work on interstate natural gas projects. The NEPA pre-filing process should be raised by a prospective applicant during early discussions with the Office of Energy Projects (OEP) about the project planning and status.

To begin the NEPA pre-filing review of a project, including starting the preparation of an environmental assessment (EA) or draft environmental impact statement (DEIS), a prospective applicant must submit a written request to the Director of OEP, 7 to 8 months prior to filing an application, that:

1. Explains why the project sponsor needs/wants to do NEPA pre-filing, including timing considerations;
2. Identifies other Federal and state agencies in the project area with relevant permitting requirements, and verifies that they are aware of and agree to participate in a pre-filing process;
3. Identifies other interested persons and organizations who have been contacted about the project;
4. Details what work has been done already, i.e., landowner contacts, agency consultations, engineering, and route planning;
5. States that the project sponsor will provide third-party contractor options for staff selection;
6. Acknowledges that a complete Environmental Report and complete application are still required at the time of filing; and
7. Details a plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including establishing a single point of contact.

We strongly encourage a prospective applicant to establish a project web-site where interested persons can go for information such as copies of applications to other agencies. (See page 20 the final report of the Keystone Dialogue on Natural Gas Infrastructure –*Expanding Natural Gas Infrastructure To Meet The Growing Demand*

For Cleaner Power, issued in March, 2002, for further guidance. Contact: www.keystone.org or call 202-452-1590 for information.) Preliminary corridor or route maps are highly desirable.

If successful pre-filing cooperation is likely, the request for staff assistance will be granted. If approved, a written acceptance will be issued by OEP, and a PF docket number will be assigned. (Note that staff will not be a **project** advocate, but a **process** advocate and will stress the benefits of working together.)

Staff and third-party contractor involvement will be designed to fit each project and will include some or all of the following:

1. Assisting the applicant in developing initial information about the proposal and identifying affected parties (including landowners and agencies);
2. Issuing a Scoping Notice and conduct scoping for the proposal;
3. Facilitating issue identification, study needs and issue resolution.
4. Conducting site visits, examining alternatives, meeting with agencies and stakeholders, and participating in the applicant's public information meetings;
5. Initiating the preparation of a preliminary EA or preliminary DEIS, which may include cooperating agency review; and
6. Reviewing draft Resource Reports for the FERC application.

For further information, contact Richard R. Hoffmann, Director, Division of Environmental and Engineering Review, Office of Energy Projects at (202) 502-8066.

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