



Dominion Transmission, Inc.
120 Tredegar Street, Riverside Building - 6th Floor, Richmond, VA 23219

October 12, 2007

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, DC 20426

**Re: Dominion Transmission, Inc.
Storage Factory Project
PF07-12-000
Response to Scoping Comments**

Dear Secretary Bose:

On July 5, 2007, the Commission issued an Approval of the Pre-Filing Process Request for Dominion Transmission, Inc.'s (DTI) Storage Factory Project and the associated National Environmental Policy Act (NEPA) review process, as filed under the above referenced docket.

Pursuant to Section 157.21(f)(9) of the Commission's regulations, DTI hereby submits responses to issues raised during scoping.

If you have any questions, please contact me at 804-819-2878.

Respectfully submitted,

Amanda K. Prestage

Amanda K. Prestage
Regulatory and Certificates Analyst II

cc: David Hanobic, FERC

encls./

Dominion Transmission, Inc. (DTI)
Storage Factory Project
PF07-12-000
Responses to Issues Raised During Scoping

I. Interested Persons

- a. LaVancher – Sept. 13, 2007 comment letter
 1. DTI concurs with Mr. LaVancher that the project will have a positive economic impact to the area.
 2. Impacts to water resources, if any, will be addressed in the resource reports. DTI will implement a Spill Prevention Control Plan, and obtain an Underground Injection Control Permit for the project.
 3. Impacts to the local road system, if any, will be addressed in the resource reports.
 4. Regarding technical review, DTI will work with the appropriate agencies during the project review and permitting process.
 5. Regarding local interests and concerns, DTI will implement the Stakeholder Communications and Outreach Plan approved for the Pre-Filing Process.
 6. DTI will continue to contribute to the community as it has in the past and as described in the Outreach Plan.

- b. Carvalho – Sept. 17, 2007 letter
 1. See attached response letter.

- c. Stevens – Sept. 18 verbal comments and Sept. 26, 2007 letter
 1. See attached response letter.
 2. Regarding a 100-foot-wide construction right-of-way (ROW), particularly for single, small diameter pipelines: DTI currently holds 100-foot-wide easements for the majority of the project-related piping routes. This does not imply that the total easement width will be utilized for construction. A 100-foot-wide construction ROW is only required when three or more pipelines are planned to be constructed within the same ROW segment. The non-gas or "process" piping will share a common ditch with minimal pipe separation, while the planned high-pressure gas piping will be installed in a separate ditch, both as a safety consideration and due to the lag in construction timing for the gas piping installation. In general, the majority of the construction ROW (approximately 75%) is planned to be 75-feet wide with a 50-foot permanent ROW. The remaining 25% of pipeline ROW lengths require a 100-foot-wide construction ROW and will have a 75-foot permanent ROW.

- d. Richardson – Sept. 18 verbal comments and Sept. 26, 2007 letter
 1. See attached response letter.
 2. See response to Stevens, no. 2 above.

- e. Phillips- Sept. 18 scoping meeting verbal comments
 1. DTI concurs that the project will have a positive economic impact to the area.
 2. Regarding noise impacts, if any, DTI will comply with applicable federal, state, and local noise regulations. Noise quality will be addressed in the resource reports.

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3. Regarding water and sewage discharge, DTI will comply with applicable federal, state, and local discharge regulations. Impacts from discharges, if any, will be addressed in the resource reports.

- f. Friedman (McNees Wallace & Nurick) on behalf of Sabshin – Sept. 28, 2007 letter
 1. DTI concurs that the appropriate research and data gathering will be conducted to fully identify, consider, and address each resource relevant to the project under the NEPA process. The relevant resources will be addressed in the resource reports.
 2. DTI will comply with applicable federal, state, and local regulations for all relevant resources.

II. Agencies

- a. U.S. Army Corps of Engineers (Corps) – Sept. 19, 2007 comment
 1. Impacts to the referenced resources, if any, including cultural and archaeological resources, wetlands, and threatened and endangered species, and associated mitigation, will be addressed in the resource reports.
 2. DTI understands that if water is to be used from Cowanesque Lake that approval from the Susquehanna River Basin Commission (SRBC) is needed. DTI is working with the Corps and SRBC regarding this resource.

- b. Tioga County Planning Commission – Sept. 24, 2007 letter
 1. Impacts to drinking water, if any, will be addressed in the resource reports. Any relevant differences between the proposed project and the former project regarding drinking water will also be described in the resource reports.

- c. Tioga County Development Corporation – Sept. 18, 2007 testimony
 1. DTI concurs that the project will have a positive economic impact to the area.

- d. Growth Resources of Wellsboro – Sept. 18, 2007 testimony
 1. DTI concurs that the project will have a positive economic impact to the area.
 2. DTI concurs that impacts to environmental resources, if any, will be addressed.

- e. Tioga County Commissioner, the Honorable Erick Coolidge – Sept. 18, 2007 testimony
 1. DTI concurs that the project will have a positive economic impact to the area.
 2. DTI concurs that impacts to environmental resources, if any, will be addressed.



Dominion Transmission, Inc.
Northeastern Area Headquarters
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Westfield, PA 16950
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October 5, 2007

Mr. and Mrs. Carlos A. Carvalho
8 Collins Street
Cranford, NJ 07016

Subject: Storage Factory Project, FERC Docket No. PF07-12-000
Farmington Township, Tioga County, PA

Dear Mr. and Mrs. Carvalho,

I would like to take this opportunity to respond to your letter that was submitted to the Federal Energy Regulatory Commission as part of the FERC Scoping Meeting for the Storage Factory Project. A copy of the letter was furnished to Dominion Transmission, Inc. (Dominion) on September 17, 2007.

For background, Dominion purchased the Tioga County assets held by NE Hub Partners, Farmington Properties, Inc. and Market Hub Partners in 2002. The assets include a proposed salt cavern gas storage project consisting of real estate, easements, and mineral rights; as well as substantial support studies and documentation.

Dominion reviewed the former salt cavern gas storage project and revised the project scope to be compatible with Dominion's gas storage objectives. The revised scope of the project utilizes real estate and easements currently held by Dominion, with the exception of an easement to connect the proposed pipeline corridor from the Gleason property on the north side of Howe Hill Road to the Stevens (formerly Fetterman) property on the south side of Howe Hill Road. As you are aware, your property and Mr. and Mrs. Stevens' property are involved at the Howe Hill Road crossing location. Dominion has examined the crossing location and is willing to consider directional bore underneath Howe Hill Road, instead of open cutting the road crossing. The directional bore will result in fewer trees to be cut and cleared at the road crossing location; however, the directional bore will require easements to be granted by both you and Mr. and Mrs. Stevens. I have enclosed a plat that depicts the directional bore location and I recommend we meet at your earliest convenience to discuss this alternate route. It is important to note the directional bore route will lessen the impact to your and the Stevens' properties at the Howe Hill Road crossing location.

Regarding your comments about our predecessor's attempts to secure easements, Dominion is aware of extensive landowner discussions and negotiations conducted on behalf of the original NE Hub Partners project. It is our understanding that negotiations proceeded in a professional manner to satisfy acquisition requirements. Your letter suggests that NE Hub Partners should

have involved more neighbors in the notification process. Dominion, in addition to personally contacting all landowners affected by the Storage Factory Project, conducted an open house in Lawrenceville to allow the general public to learn more about the project and provide the stakeholders with a forum to voice their concerns and opinions. Dominion was very pleased with the attendance at the open house and I recall discussing your concerns with you and your neighbors, Mr. and Mrs. Stevens and Mr. Richardson.

Regarding the existing PPL Gas Utilities pipeline corridor through your property, the pipeline provides gas transmission service to PPL Gas Utilities customers throughout northern Tioga County. PPL's gas distribution service is connected to most residences in the vicinity of your property and is a convenient and economical source of fuel. Being that your property is located between the Meeker and the Tioga gas storage pools, pipeline corridors have existed in the area since the 1930s when gas was first discovered in the area.

Dominion seriously considers and evaluates the environmental impact when selecting new pipeline routes. The proposed route that involves less than 0.1 acre of your property will result in the least land and forest disturbance when compared to other alternate routes.

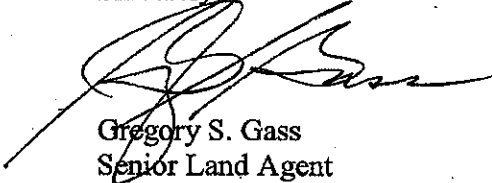
Regarding the low water level in the Cowanesque Reservoir, Dominion is investigating alternate water supplies in the area, at the request of the Susquehanna River Basin Commission.

Regarding the siting of a large gas storage facility in close proximity to an ever increasing residential area, Dominion will follow and comply with all aspects of the FERC approval process. Also, Dominion holds the necessary rights to develop the properties that will be affected by the proposed gas storage caverns.

Regarding the possibility of brine or gas leaching into domestic water wells, all pipelines and wells will be designed, operated and maintained in accordance with PADEP and FERC regulatory requirements.

In the event you have further questions or concerns, please do not hesitate to contact me.

Sincerely,



Gregory S. Gass
Senior Land Agent



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October 5, 2007

Mr. Daniel R. Stevens
622 Howe Hill Road
Tioga, PA 16946

Subject: Storage Factory Project, FERC Docket No. PF07-12-000
Farmington Township, Tioga County, PA

Dear Mr. Stevens,

I would like to take this opportunity to respond to your comments that were submitted to the Federal Energy Regulatory Commission as part of the FERC Scoping Meeting for the Storage Factory Project. The comments were furnished to Dominion Transmission, Inc. (Dominion) on October 1, 2007.

For background, Dominion purchased the Tioga County assets held by NE Hub Partners, Farmington Properties, Inc. and Market Hub Partners in 2002. The assets include a proposed salt cavern gas storage project consisting of real estate, easements, and mineral rights; as well as substantial support studies and documentation.

I appreciated the opportunity to meet with you, Mrs. Stevens and Mr. Richardson on September 26, after the FERC Scoping Meeting. We were able to discuss minimizing the impact on your property at the Howe Hill Road crossing location. As I mentioned during our meeting, Dominion has examined the crossing location and is willing to consider a directional bore underneath Howe Hill Road, instead of open cutting the road crossing. The directional bore will result in fewer trees to be cut and cleared at the road crossing location; however, the directional bore will require easements to be granted by both you and Mr. and Mrs. Carvalho. I have enclosed a plat that depicts the directional bore location and I recommend we meet at your earliest convenience to discuss this alternate route. It is important to note the directional bore route will lessen the impact to your property at the Howe Hill Road crossing location.

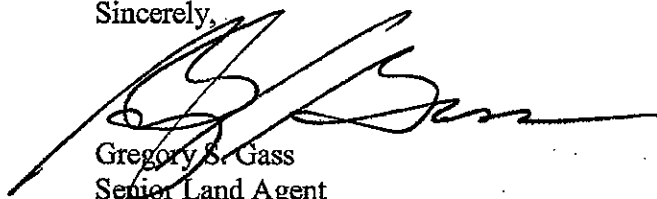
Also, we discussed your request to site the proposed pipeline corridor along existing pipeline routes so that none of your property would be affected by Dominion's proposed pipeline route. Your suggested route involved continuing northwest along the PPL pipeline corridor to Palmer and Tioga Stations, thence following Dominion's LN-2 and LN-34 transmission pipelines in a northeast direction. Although the route would utilize existing pipeline corridors, the extra 5,700 lineal feet of easement corridor would require disturbance of an additional 9.81 acres of land. The additional land disturbance coupled with the additional expense of 5,700 feet of 8" pipeline construction and 5,700 feet of 10" pipeline construction costs make it difficult to justify a much

longer pipeline route. Also, the longer route would cross six additional landowners who would have concerns very similar to yours. Therefore, Dominion prefers to utilize the existing easement corridor across the property you purchased from William Fetterman. I have attached a copy of the Fetterman easement agreement for your reference. However, if you can provide an alternate route across your property that ties into the proposed route on the adjoining Schoonover and Gleason properties, Dominion would consider it as a viable alternative.

Regarding your comment that Dominion seeks a 100 foot right of way, the Fetterman easement agreement provides for a corridor up to 100 feet wide. The Storage Factory Project proposes to utilize a corridor 75 feet in width in the vicinity of your property. Of the 75 feet of easement width, the permanent easement width will be 50 feet and the balance of 25 feet will be temporary workspace that will be revegetated in accordance with the project Environmental Management and Construction Plan.

In the event you have further questions or concerns, please do not hesitate to contact me.

Sincerely,



Gregory S. Gass
Senior Land Agent



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October 5, 2007

Mr. R. James Richardson
550 Howe Hill Road
Tioga, PA 16946

Subject: Storage Factory Project, FERC Docket No. PF07-12-000
Farmington Township, Tioga County, PA

Dear Mr. Richardson,

I would like to take this opportunity to respond to your letter that was submitted to the Federal Energy Regulatory Commission as part of the FERC Scoping Meeting for the Storage Factory Project. A copy of the letter was furnished to Dominion Transmission, Inc. (Dominion) on September 27, 2007.

For background, Dominion purchased the Tioga County assets held by NE Hub Partners, Farmington Properties, Inc. and Market Hub Partners in 2002. The assets include a proposed salt cavern gas storage project consisting of real estate, easements, and mineral rights; as well as substantial support studies and documentation.

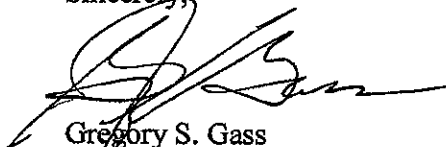
Dominion reviewed the former salt cavern gas storage project and revised the project scope to be compatible with Dominion's gas storage objectives. The revised scope of the project utilizes real estate and easements currently held by Dominion, with the exception of an easement to connect the proposed pipeline corridor from the Gleason property on the north side of Howe Hill Road to the Stevens (formerly Fetterman) property on the south side of Howe Hill Road. As you are aware, the proposed pipeline route is not located on your property. When you purchased your property from Mr. William Fetterman, the purchase was subject to the existing easement agreement that is recorded in the Tioga County Recorder of Deeds Office at Deed Book 677 at Page 248, a copy is attached for your reference. Although the easement agreement provides for a corridor up to 100 feet wide, the Storage Factory Project proposes to utilize a corridor 75 feet in width in the vicinity of your property. Of the 75 feet of easement width, the permanent easement width will be 50 feet and the balance of 25 feet will be temporary workspace that will be revegetated in accordance with the project Environmental Management and Construction Plan.

Regarding your concerns for wetlands, flora and fauna, Dominion seriously considers and evaluates the environmental impact when selecting new pipeline routes. During our meeting on September 26, you requested that Dominion consider the a route from the former NE Hub Partners project to connect with Dominion's existing LN-2 and LN-34 transmission pipeline corridor in the vicinity of Tioga Station. The pipeline route from nine years ago directly

connected the NE Hub Partners salt cavern storage complex to the salt processing plant site at Tioga. Dominion's revised project scope has placed the proposed leaching and compression station site approximately 5,000 feet northeast of the original NE Hub Partners leaching station site. Although the NE Hub Partners route would utilize existing pipeline corridors, the extra 5,700 lineal feet of easement corridor would require disturbance of an additional 9.81 acres of land. The additional land disturbance coupled with the additional expense of 5,700 feet of 8" pipeline construction and 5,700' of 10" pipeline construction costs make it difficult to justify a much longer pipeline route. Also, the longer route would cross six additional landowners who would have concerns very similar to yours and your neighbors. By utilizing the proposed easement corridor, Dominion will minimize the overall impact of the project.

In the event you have further questions or concerns, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gregory S. Gass', written over a horizontal line.

Gregory S. Gass
Senior Land Agent

Submission Contents

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