



DONALD F. SANTA  
PRESIDENT & CEO

January 7, 2015

The Honorable Mike Pompeo  
436 Cannon House Office Building  
Washington, DC 20515

Dear Congressman Pompeo,

On behalf of the membership of the Interstate Natural Gas Association of America (INGAA), I want to express our support for H.R. 161, the “Natural Gas Pipeline Permitting Reform Act.” INGAA’s 24 members represent the vast majority of the interstate natural gas transmission pipeline companies in the United States, operating approximately 200,000 miles of pipelines, and serving as an indispensable link between natural gas producers and consumers.

The process for reviewing and approving new natural gas pipelines at the Federal Energy Regulatory Commission (FERC) is well established. Review by FERC, however, is only part of the overall process. In order to construct a new natural gas pipeline, an operator must obtain permits from a myriad of other federal and state agencies.

The Energy Policy Act of 2005 attempted to coordinate the permitting of new natural gas pipelines by designating FERC as the lead agency under the National Environmental Policy Act (NEPA) and by granting FERC the authority to set deadlines for permitting agencies to act on pipeline applications. EAct 2005 did not give FERC the authority to enforce such deadlines. As a result, permitting agencies routinely ignore those deadlines.

Your legislation seeks to rectify the situation by creating clear deadlines for both FERC and the various permitting agencies involved in approving an interstate natural gas pipeline project. It is important to note that the time allowed for action by permitting agencies prescribed by the legislation does not begin to toll until after FERC has completed its environmental review under NEPA. By that point in the process, a pipeline project developer has been in consultations with both FERC and the permitting agencies for 12 to 18 months, and sometimes longer. It is therefore entirely reasonable to expect that a permitting agency will be in a position to make a final decision within 90 days of completion of the NEPA review.

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As the nation expands its supplies of domestically produced natural gas to unprecedented levels, the need for new pipeline capacity to transport that natural gas is growing as well. It is critical that pipeline expansion keep pace with demand growth in regions such as the Mid-Atlantic and New England. A clear, timely review of permits associated with proposed pipeline projects is critical to meeting these goals. INGAA appreciates your efforts to bring some clarity to the process, and we therefore urge the House of Representatives to pass H.R. 161.

Respectfully,

A handwritten signature in blue ink, appearing to read "D. F. Santa", with a stylized flourish at the end.

Donald F. Santa