



Transcontinental Gas Pipe Line Company, LLC
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713-215-2000

June 6, 2025

Melanie Davenport
Virginia Department of Environmental Quality
1111 E Main Street, Suite 1400
Richmond, Virginia 23219

Transcontinental Gas Pipe Line Company, LLC
Southeast Supply Enhancement Project
Eden Loop – Erosion and Sediment Control Plan / Post Construction Stormwater Management Plan
Compressor Station 165 – Erosion and Sediment Control Plan / Post Construction Stormwater Management Plan

Dear Ms. Davenport:

Transcontinental Gas Pipe Line Company, LLC (Transco) is proposing to construct the Southeast Supply Enhancement Project (SSE or Project). The Project is an expansion of Transco's existing natural gas transmission system designed to enable Transco to reliably provide additional natural gas to major local distribution and utility companies in Virginia and throughout the southeast to meet the growing demand for natural gas in the southeast United States. The Project is regulated by the Federal Energy Regulatory Commission (FERC) pursuant to Section 7(c) of the Natural Gas Act. Transco began public outreach for the Project in November 2023 to educate and build relationships with stakeholders and communities. On October 29, 2024, Transco filed a request for authorization from FERC under Sections 7(b) and 7(c) of the Natural Gas Act for appropriate abandonment and a Certificate of Public Convenience and Necessity (Certificate) to construct, own, operate, and maintain the proposed Project facilities (FERC Docket No. CP25-10). Transco is requesting from Virginia Department of Environmental Quality Additional Upland Conditions for Water Quality Certification for the below Project components in Virginia:

Pipeline Facilities

- Approximately 26.8 miles of the 42-inch-diameter Eden Loop pipeline in Pittsylvania County, Virginia.

Compression Facilities

- The addition of two [33,000 horsepower (HP) each] electric motor-driven (EMD) compressor units at Transco's existing Compressor Station 165 located in Pittsylvania County, Virginia. Compressor Station 165 will be limited to a total incremental output of 45,000 HP, thereby increasing the total certificated station output to 96,930 HP;

As part of this request, Transco is providing the following items for review and approval:

SSE Project (Eden Loop and Compressor Station 165)

1. Complete Application Checklist
2. Power of Attorney

Eden Loop

3. Alternative Submission Checklist
4. Erosion and Sediment Control (E&SC) Plan (hard copy to follow)
5. E&SC Plan Supporting Calculations
6. Post Construction Stormwater Management (PCSM)/Water Quantity Land Cover Maps
7. Water Quality Land Cover Maps
8. EDEN-Main Line Valve (MLV)-02 Stormwater Management (SWM) Plan (hard copy to follow)
9. EDEN-MLV-02 SWM Calculations
10. EDEN-MLV-03 SWM Plan (hard copy to follow)
11. EDEN-MLV-03 SWM Calculations
12. Virginia Runoff Reduction Method (VRRM) Spreadsheets
13. Landowner List
14. Soil Survey Report
15. Geotechnical Engineering Letter Report (by Others)

For the Eden Loop, Transco is requesting a waiver for all areas returning to pre-development conditions and land covers. The waiver areas encompass the entirety of the Eden Loop except for areas converted from forest to another land cover and the Main Line Valve sites. Specific areas requested as part of the waiver are provided in table format within the Land Cover Maps.

Compressor Station 165:

16. Compressor Station 165- E&SC Plan and Supporting Calculations
17. Compressor Station 165- Post Construction Stormwater Management (PCSM) Plan and Supporting Calculations
18. Compressor Station 165- Full Plan Set
19. VRRM Spreadsheets

The following variance is requested as outlined below for the Eden Loop and the section of the Eden Loop that falls within the Compressor Station 165 limits of disturbance:

Minimum Standard 16 Variance

- Description of Request
 - Transco respectfully requests a variance to 9VAC25-875-560.16 (Minimum Standard 16) which limits open trenches to 500 feet at one time. Transco proposes that the limit be increased to 3 miles of a continuous trench open at one time.
- Reason
 - This variance is requested due to the length of the Eden Loop, the diameter of the pipeline, and the equipment required to facilitate the installation and construction techniques. In addition, Transco is committed to creating a safe working environment. As outlined in the construction sequence below, efficient and safe pipeline construction requires multiple overlapping and sequential activities including, but not limited to, clearing and grading, pipe stringing and bending, welding, trench excavation, backfilling, and restoration. Since some of these tasks are dependent on the preceding task, a significant length of work area is required to eliminate the conflicts that occur with working in close proximity and to ensure the safe and timely completion of work. This

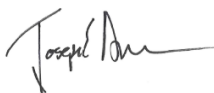
will reduce the total duration of construction and allow for quicker establishment of final grade and implementation of permanent stabilization measures. Although Transco's preferred sequence puts trenching after pipe stringing and fabrication, there are times when the trenching must be completed first. In either case, trenching is always a key construction phase that drives the production levels necessary to complete pipeline construction in a safe and timely manner.

- Typical Construction Sequence
 - Pre-construction survey
 - Clearing and grading and installation of erosion control Best Management Practices (BMPs)
 - Pipe stringing and bending
 - Welding
 - Pipe coating and x-ray inspection
 - Trenching
 - Lowering pipe in
 - Backfilling
 - Hydrostatic testing
 - Restoration
- Assurance
 - To ensure that the variance stipulations are met, Transco will have a team of VDEQ-certified environmental inspectors assigned to the project during construction of the project.

Transco thanks you in advance for your review of this permit application. Please contact me with any questions or concerns.

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Sincerely,
TRANSCONTINENTAL GAS PIPE LINE COMPANY, LLC



Joseph Dean
Manager Permitting