

January 3, 2007

Magalie R. Salas, Secretary
Federal Energy Regulatory Commission
Attn: OEP/DG2E/Gas Branch 3
888 First St., N.E., Room 1A
Washington, DC 20426

RE: Docket No. PF06-13-000, Downeast LNG Project

Dear Secretary Salas:

This letter is being sent in response to FERC's request for comments on environmental issues related to the expansion of the Maritimes & Northeast (Maritimes) pipeline system that would likely be required to accommodate the Downeast LNG Project. We appreciate FERC's acknowledgement that the effects of the expansion of Maine's existing natural gas pipelines must be considered in its decision on the development of any LNG import facility in our State.

At the outset, Maine D.E.P. believes it is important to recognize that Maritimes is not currently proposing an expansion of its system to accommodate the Downeast LNG Project. However, with the supplemental notice of intent to prepare an Environmental Impact Statement (EIS) for the Downeast LNG project dated December 1, 2006, FERC is acknowledging that an expansion would likely be necessary and therefore an analysis of the potential impacts from such facilities is being included in the EIS.

The Resource Reports provided by Downeast LNG, Inc. do not contain the level of detail needed by the State to review potential environmental impacts associated with the potential expansion of the Maritimes facilities. For example, they do not address concerns about the proposed Eliot, Westbrook, Richmond, Searsmont, Brewer, Woodchopping Ridge and Baileyville loop lines that Maine D.E.P. staff expressed to Maritimes and FERC staff during the pre-filing stage of the M&NE Phase IV project (Docket No. CP06-335-000). Maine D.E.P. staff have already visited numerous potential stream crossings along the proposed loop lines and expressed concerns to Maritimes and FERC staff about the alignment of the loop lines in many locations, in particular about the lines that were proposed on the outside of the existing Maritimes pipeline and MEPCO transmission corridor as opposed to inside the existing pipeline, in already-cleared corridor.

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Without more information at this stage, Maine D.E.P. is unable to provide meaningful comments on the environmental impacts of the Maritimes expansion that would be required to accommodate the Downeast LNG project. We believe it would be more appropriate and a better use of the State's resources to comment on the specific environmental impacts associated with the potential expansion when those facilities are proposed by Maritimes.

Thank you for your consideration of my comments.

Sincerely,

Linda Kokemuller, SMRO Licensing Coordinator
Division of Land Resource Regulation
Bureau of Land and Water Quality

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