

|  | Original Document Text   | Proposed Revision   | Explanation of Burden Impact  | Type of Filings Affected  | Burden Hours per Response / Filing | Number of Filings | Total Burden Hours |
|--|--|---|---|---|------------------------------------|-------------------|--------------------|
| <b>Plan Section Revision</b>                                 |  |   |   | (PN = blanket certificate prior notice) (auto = blanket certificate automatic authorizations) |                                    |                   |                    |
| I. Applicability   | The intent of this Plan is to assist applicants by identifying baseline mitigation measures for minimizing erosion and enhancing revegetation. The project sponsors should specify in their applications for a FERC Certificate (Certificate) any individual measures in this Plan they consider unnecessary, technically infeasible, or unsuitable due to local conditions and to fully describe any alternative measures they would use. Applicants should also explain how those alternative measures would achieve a comparable level of mitigation. Once a project is certificated, further changes can be approved. Any such changes from the measures in this Plan (or the applicant's approved plan) will be approved by the Director of the Office of Energy Projects (Director), upon the applicant's written request, if the Director agrees that an alternative measure: | The intent of this Plan is to assist <u>project sponsors</u> by identifying baseline mitigation measures for minimizing erosion and enhancing revegetation. <u>Project sponsors should specify in their applications for a new FERC authorization and in prior notice and advance notice filings</u> , any individual measures in this Plan they consider unnecessary, technically infeasible, or unsuitable due to local conditions and fully describe any alternative measures they would use. <u>Project sponsors</u> should explain how the alternative measures would achieve a comparable level of mitigation. Once a project is authorized, <u>project sponsors can request further changes as variances to</u> the measures in this Plan (or the applicant's approved plan). The Director of the Office of Energy Projects (Director) <u>will consider approval of variances, upon the project sponsor's</u> written request, if the Director agrees that <u>a variance</u> : | The proposed revision adjusts the terminology to be inclusive of other types of projects that come before the Commission and must address Plan requirements: including, blanket prior notice, blanket automatics, and NPGA 311 advanced notification filings. Blanket certificate and NPGA 311 project sponsors may request alternative measures to the Plan and Procedures, as noted in sec. 157.206(b)(3)(iv) of our regulations; however, the Plan currently only refers to this provision in association with NGA 7c or 7b Certificate applications. The process for automatic and prior notice type projects is unclear and often confusing for both FERC staff and project sponsors. No new reporting obligations or record keeping burden are imposed by these newly proposed references. This revision would provide clarity and reduce the number of phone calls and inquiries to staff.   | Blanket PNs and Autos, NPGA 311 advanced notifications  | -1                                 | 164               | -164               |
| I. (Applicability)   | Any requirements in this Plan to file material with the Secretary of the FERC (Secretary) do not apply to projects undertaken under the provisions of the blanket certificate program. This exemption does not apply to a request for alternative measures.  | <u>Sponsors of projects planned for construction under automatic authorization must receive written approval for any variance in advance of construction.</u>   | This statement in I.A has been misinterpreted to exclude all blanket certificate projects (there are two types - prior notice and automatic authorizations) from filing requirements, which is false. The revision would require that the prior notice projects file winter construction plans, while automatic projects would remain exempt. This change will reflect common practice and the expanding scope of blanket prior notice projects that are considerably larger and more complex than when the Plan was last updated. The revision would clarify staff expectations for blanket prior notice projects filings; although the reporting burden is increased, it is not significant as data requests would be reduced. Blanket projects would remain exempt from quarterly reporting requirements however, and are addressed in a suggested edit to section VII to preserve the administratively streamlined nature of these projects, as intended. The final statement in this revision clarifies the process for receiving staff approval for alternative measures for automatic authorization projects, per our regulations. No new burden is created. | 0.15 of the Blanket PNs (only affects blankets proposing winter construction)                 | 20                                 | 6                 | 120                |
| II.B.17 (EI Responsibilities) and III.E. (Disposal Planning) | <i>new statement under EI Responsibilities to address beneficial reuse and modifications to Disposal Planning; and,</i><br><br>E. DISPOSAL PLANNING Determine methods and locations for the disposal of construction debris (e.g., timber, slash, mats, garbage, drill fluids, excess rock, etc). Off-site disposal in other than commercially operated disposal locations is subject to compliance with all applicable survey, landowner permission, and mitigation requirements.   | <u>17. Verifying that locations for any disposal of excess construction materials for beneficial reuse comply with section III.E.</u><br><br>E. DISPOSAL PLANNING<br><br>Determine methods and locations for the <u>regular collection, containment, and disposal of excess construction materials and debris</u> (e.g., timber, slash, mats, garbage, <u>drill cuttings and fluids</u> , excess rock, etc) <u>throughout the construction process</u> . <u>Disposal of materials for beneficial reuse must not result in adverse environmental impact</u> and is subject to compliance with all applicable survey, <u>landowner or land management agency approval, and permit</u> requirements.   | These statements provide standard guidance on beneficial reuse and will reduce inquiries of staff.  | All Filings   | -1                                 | 218               | -218               |
| III.F.3. (Preconstruction Planning)                          | <i>New statement in "Agency Coordination" regarding wildlife/livestock, and three new preconstruction planning requirements.</i>   | <u>Additional measures under Agency Coordination...#3. Develop specific procedures in coordination with the appropriate agencies and land managers as necessary to allow for livestock and wildlife movement and protection during construction. #4. Develop specific blasting procedures in coordination with the appropriate agencies that address pre- and post-blast inspections, advanced public notification, and mitigation measures for building foundations, groundwater wells, and springs. Use appropriate methods (e.g., blasting mats) to prevent damage to nearby structures and to prevent debris from entering sensitive environmental resource areas.</u> Additional planning requirements H: Residential Construction, and I Winter Construction Plans <i>(full text not included here.)</i>  | The revisions identify additional resource considerations during project planning. Livestock and wildlife movement should be identified and mitigated early in the review process, but was not noted in the current Plan. Our residential construction requirements are currently only found in the "Guidance Manual", a somewhat obscure reference, or communicated via staff data request. For blasting, the suggested edit would include best management practices that are expected, but not expressly stated in the current Plan. For winter construction, the new statement makes clear that plans should be provided early in the review process; thus the suggested edit to the upfront "Preconstruction Planning" section of the Plan, whereas this statement previously occurred deep into the text of the Plan. On the whole, while these are newly identified (or in the case of Winter Construction Plans, modified) reporting needs, the additional burden would be minor due to greater clarity of the staff's expectations and early identification of issues, resulting in more complete reports and less data requests.                           | All filings   | 5                                  | 218               | 1090               |

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| IV.A.1 (Installation)                  | Project-related ground disturbance shall be limited to the construction right-of-way, extra work space areas, pipe storage yards, borrow and disposal areas, access roads, and other areas approved in the Certificate. Any project-related ground disturbing activities outside these Certificated areas, except those needed to comply with the Plan and Procedures (e.g., slope breakers, energy-dissipating devices, dewatering structures, drain tile system repairs) will require prior Director approval. All construction or restoration activities outside of the Certificated areas are subject to all applicable survey and mitigation requirements.   | Project-related ground disturbance shall be limited to the construction right-of-way, extra work space areas, pipe storage yards, borrow and disposal areas, access roads, and other areas approved in the Certificate. Any project-related ground disturbing activities outside these Certificated areas <u>will require prior Director approval. This requirement does not apply to activities needed to comply with the Plan and Procedures (e.g., slope breakers, energy-dissipating devices, dewatering structures, drain tile system repairs) or minor field realignments and workspace shifts per landowner needs and requirements that do not affect other landowners or sensitive environmental areas.</u> All construction or restoration activities outside of the <u>authorized</u> areas are subject to all applicable survey and <u>permit</u> requirements, <u>and landowner easement agreements.</u> | This revision will reduce variance requests by making it more apparent that companies do not require a written variance for minor field realignments per landowner. These are common questions that staff receives.  | All Filings                             | -2  | 218 | -436 |
| VII.A.5 (Post-Construction Activities) | Routine vegetation maintenance clearing shall not be done more frequently than every 3 years. However, to facilitate periodic corrosion and leak surveys, a corridor not exceeding 10 feet in width centered on the pipeline may be maintained annually in a herbaceous state. In no case shall routine vegetation maintenance clearing occur between April 15 and August 1 of any year.  | Routine vegetation <u>mowing or clearing over the full width of the permanent right-of-way in uplands</u> shall not be done more frequently than every 3 years. However, to facilitate periodic corrosion/leak surveys, a corridor not exceeding 10 feet in width centered on the pipeline may be <u>cleared at a frequency necessary to maintain an herbaceous state.</u> In no case shall routine vegetation <u>mowing or clearing occur during the migratory bird nesting season between April 15 and August 1 of any year unless specifically approved in writing by the responsible land management agency for the U.S. Fish and Wildlife Service.</u>  | This revision provides for flexibility if a different clearing window is approved by the applicable land management agency, thus reducing the need for a variance request. This does not occur frequently, but would represent a minor reduction in reporting burden during pipeline operations.   | Est 2 variance filings avoided per year | -20 | 2   | -40  |
| VII.B.1.e. (Reporting)                 | <i>NEW ITEM UNDER "The project sponsor shall maintain records that identify by milepost:"</i>   | <u>the location of any subsurface drainage repairs or improvements conducted during restoration</u>  | This revision would represent a new records retention requirement. It is suggested to improve companies abilities to respond to complaints about drain tile damage and drainage issues. The Commission does not specify a retention timeframe, but it is generally understood to be at for at least 2 years following construction, the timeframe during which quarterly reports shall be filed. Most landowner complaints are logged and resolved during this 2 year timeframe.   | All Filings                             | 5   | 218 | 1090 |
| VII.B.2 (Reporting)                    | The project sponsor shall file with the Secretary quarterly activity reports documenting problems, including those identified by the landowner, and corrective actions taken for at least 2 years following construction.   | 2. The project sponsor shall file with the Secretary quarterly activity reports documenting the <u>results of follow-up inspections required by VII.A.1</u> , any problem areas, including those identified by the landowner, and corrective actions taken for at least 2 years following construction.  | It is a common misinterpretation that FERC only needs to be informed of landowner complaints. Our intention has always been to receive a thorough documentation of restoration status in the quarterly reports to determine future inspection requirements for the project as well as documenting the restoration monitoring effort that is performed by the project sponsors. While we feel this revision primarily reflects current practice and is a modification rather than a new requirement, it will increase the reporting burden for those companies that have historically provided very abbreviated quarterly activity reports. | Section 7                               | 5   | 45  | 225  |
| VII.B.2 (Reporting)                    | ADDITIONAL STATEMENT UNDER B. REPORTING   | <u>The requirement to file quarterly activity reports with the Secretary does not apply to projects constructed under the automatic authorization, prior notice, or advanced notice provisions in the FERC's regulations.</u>  | The intent of the revision is to clarify that quarterly reports are still only required for case-specific NGA Section 7-type projects. This is a clarification of current requirements only and represents no additional reporting burden.   | All Filings                             | 0   | 218 | 0    |
| <b>Procedure Section Revision</b>      |   |  |  |   | 11  |     | 1667 |
| I. (Applicability)                     | The project sponsors should specify in their applications for a FERC Certificate (Certificate) any individual measures in these Procedures they consider unnecessary, technically infeasible, or unsuitable due to local conditions and to fully describe any alternative measures they would use. Applicants should explain how the alternative measures would achieve a comparable level of mitigation. Once a project is certificated, further changes can be approved. Any such changes from the measures in this Plan (or the applicant's approved plan) will be approved by the Director of the Office of Energy Projects (Director), upon the applicant's written request, if the Director agrees that an alternative measure. | Project sponsors should specify in their applications for a <u>new FERC authorization and in prior notice and advance notice filings</u> , any individual measures in these Procedures they consider unnecessary, technically infeasible, or unsuitable due to local conditions and fully describe any alternative measures they would use. <u>Project sponsors should explain how the alternative measures would achieve a comparable level of mitigation. Once a project is authorized, project sponsors can request further changes as variances to the measures in this Plan (or the applicant's approved plan).</u> The Director of the Office of Energy Projects (Director) <u>will consider approval of variances, upon the project sponsor's written request, if the Director agrees that a variance</u> .   | Because this revision is identical to that in the Plan and affects the same respondents in the same manner, no additional burden is reported here to avoid double counting   | All Filings                             | 0   | 218 | 0    |

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| I. (Applicability)                            | Any requirements in these Procedures to file material with the Secretary of the FERC (Secretary) do not apply to projects undertaken under the provisions of the blanket certificate program. This exemption does not apply to a request for alternative measures.   | Sponsors of projects planned for construction under automatic authorization must receive written approval for any variance in advance of construction.  | This statement in the current Procedures has been misinterpreted to mean the Procedures do not apply to blanket certificate projects, which is false. The "material" it applies to are the Preconstruction filings identified in section II, including hydrotest data, trenching and blasting schedules, site-specific plans for major waterbody crossings, reduced setbacks, HDD Plans, >75-foot right-of-way in wetlands, wetland delineation reports, and wetland restoration reports. Rather than exclude blanket projects entirely from the requirement to file these reports, the revision would mean that blanket prior notices now file this information, while automatic projects would remain exempt. This change will reflect common practice and the expanding scope of blanket prior notice projects. The revision would provide project sponsors with a clear understanding of our expectations for blanket prior notice projects; although the reporting burden is increased, it is not significant as data requests would be reduced. Blanket projects would remain exempt from wetland monitoring reports via a suggested edit to section VII. The final statement clarifies the approval process for automatic authorization projects per our regs; no new burden is created by this new statement. | Blanket PNs and NGPA 311 advanced notice filings            | 30  | 38  | 1140 |
| II.B. (Preconstruction Filing)                | [File] a schedule identifying when trenching or blasting would occur within each waterbody greater than 10 feet wide, or within any designated coldwater fishery.  | [File] a schedule identifying when trenching or blasting would occur within each waterbody greater than 10 feet wide, within any designated coldwater fishery, or any waterbody identified as habitat for federally-listed threatened and endangered species.   | The revision may result in more stream crossings on a project sponsor's schedule. The intent here is to have a ready schedule for the more significant waterbody crossing to assist staff in inspection timing and commenters felt endangered species habitat should be a consideration. This will add only a very minor additional reporting burden.   | Section 7, Blanket PN, and NGPA 311 advanced notice filings | 2   | 83  | 166  |
| II.B. (Preconstruction Filing)                | B. The following site-specific construction plans required by these Procedures must be filed with the Secretary for the review and written approval by the Director:<br><br>1. plans for extra work areas that would be closer than 50 feet from a waterbody or wetland; 2. site-specific plans for the use of a construction right-of-way greater than 75-feet-wide in wetlands.  | A. The following information must be filed with the Secretary of the FERC (Secretary) prior to the beginning of construction, for the review and written approval by the Director:<br><br>1. site-specific justifications for extra work areas that would be closer than 50 feet from a waterbody or wetland;<br>2. site-specific justifications for the use of a construction right-of-way greater than 75-feet-wide in wetlands.  | The revision would allow submission of detailed justifications rather than the site-specific construction plans required in the current version of the Procedures; therefore reducing the burden on jurisdictional entities from preparation of detailed construction drawings for reduced setbacks. Staff finds it generally sufficient and more common practice to evaluate a table of site-specific explanations, rather than require full scale site-specific plans for each reduced setback or expanded right-of-way in wetlands. The quality of aerial photo based alignments and topographic maps has improved significantly in recent years, which allows for a more detailed evaluation of the field constraints.  | Section 7, Blanket PN, and NGPA 311 advanced notice filings | -10 | 83  | -830 |
| IV.A. (Preconstruction Planning)              | A copy of the Stormwater Pollution Prevention Plan (SWPPP) prepared for compliance with the U.S. Environmental Protection Agency's (EPA) National Stormwater Program General Permit requirements must be available in the field on each construction spread. The SWPPP shall contain Spill Prevention and Response Procedures that meet the requirements of state and Federal agencies   | The project sponsor shall develop project-specific Spill Prevention and Response Procedures that meet applicable requirements of state and federal agencies. A copy shall be filed with the Secretary and made available in the field on each construction spread.  | The revision is primarily a terminology change but could also serve to reduce reporting burden. Staff proposes to remove reference to SWPPP because compliance with that statute rests with the EPA or applicable State agencies and application of this law varies depending on the agency's interpretation of the conditional exemption status ( <a href="http://cpub.epa.gov/npdes/stormwater/oilgas.cfm">http://cpub.epa.gov/npdes/stormwater/oilgas.cfm</a> ). Our reference to this statute may cause confusion in the industry; we have cause to believe that some companies are filing SWPPPs despite the exemption, out of an abundance of caution. By retaining this section, we are clarifying our intent and removing potential confusion and information collection burden.  | Section 7, Blanket PN, and NGPA 311 advanced notice filings | -1  | 83  | -83  |
| IV.A.1.f (Preconstruction Planning)           | concrete coating activities are not performed within 100 feet of a wetland or waterbody boundary, unless the location is an existing industrial site designated for such use.  | "concrete coating activities are not performed within 100 feet of a wetland or waterbody boundary, unless the location is an existing industrial site designated for such use. These activities can occur closer only if the EI finds, in advance, no reasonable alternative and the project sponsor and its contractors have taken appropriate steps (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill.  | The revision would allow for an exception without the need for submittal of a variance request. This reduces reporting burden.  | All Filings   | -1  | 218 | -218 |
| V.B.2.b. (Waterbody Crossings - Installation) | The project sponsor shall file with the Secretary for review and written approval by the Director, a site-specific construction plan for each extra work area with a less than 50-foot setback from the water's edge, (except where the adjacent upland consists of actively cultivated or rotated cropland or other disturbed land) and a site-specific explanation of the conditions that will not permit a 50-foot setback. | The project sponsor shall file with the Secretary for review and written approval by the Director, site-specific justification for each extra work area with a less than 50-foot setback from the water's edge, (except where the adjacent upland consists of actively cultivated or rotated cropland or other disturbed land). The justification must specify the conditions that will not permit a 50-foot setback and measures to ensure the waterbody is adequately protected. This requirement does not apply to projects constructed under automatic authorization. | The reduction in burden from this change is addressed above in discussing changes to section II.B.  | Section 7, Blanket PN, and NGPA 311 advanced notice filings | 0   | 83  | 0    |
| V.B.3.g. (Waterbody Crossings - Installation) | New Statement  | Crossing of waterbodies when they are dry or frozen to the bottom may proceed using standard upland techniques and the staff's Plan, provided that Environmental Inspector verifies that water is unlikely to flow between initial disturbance and final stabilization of the feature. In the event of perceptible flow, the project sponsor must comply with all applicable Procedure requirements for "waterbodies" as defined in section I.B.1.  | The suggested revision would clarify allowable crossing methods if no flow is present in order to meet the challenge of changing flow conditions, while providing environmental protection and schedule/cost control. This would avoid the burden of certain variance requests.   | All Filings   | -4  | 218 | -872 |
| V.B.6.d. (Waterbody Crossings - Installation) | New Statement for d. Horizontal Directional Drill (HDD)  | (2) justification that disturbed areas are limited to the minimum needed to construct the crossing;<br><br>(3) identification of any aboveground disturbance or clearing between the HDD entry and exit workspaces during construction.   | This is a best management practice for HDD crossings of waterbodies and wetlands that often results in data requests if not identified in the application. So although it would appear to be a new information collection, it represents standard practice and in fact would reduce burden by avoiding data requests. Inclusion of this statement would provide greater clarity to applicants and improve consistency for staff and repres.   | Section 7, Blanket PN, and NGPA 311 advanced notice filings | -3  | 83  | -249 |

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| V.D. (Post Construction Maintenance)  | Limit vegetation maintenance adjacent to waterbodies to allow a riparian strip at least 25 feet wide, as measured from the waterbody's mean high water mark, to permanently revegetate with native plant species across the entire construction right-of-way. However, to facilitate periodic pipeline corrosion/leak surveys, a corridor centered on the pipeline and up to 10 feet wide may be maintained in a herbaceous state. In addition, trees that are located within 15 feet of the pipeline that are greater than 15 feet in height may be cut and removed from the permanent right-of-way. | 1. Limit routine vegetation <u>mowing or clearing</u> adjacent to waterbodies to allow a riparian strip at least 25 feet wide, as measured from the waterbody's mean high water mark, to permanently revegetate with native plant species across the entire construction right-of-way. However, to facilitate periodic corrosion/leak surveys, a corridor centered on the pipeline and up to 10 feet wide may be cleared at a frequency necessary to maintain the 10-foot corridor in an herbaceous state. In addition, trees that are located within 15 feet of the pipeline that have roots that could compromise the integrity of the pipeline coating may be cut and removed from the permanent right-of-way. Do not conduct any routine vegetation mowing or clearing in riparian areas that are between HDD entry and exit points. 3. Time of year restrictions specified in section VII.A.5 of the Plan (April 15 – August 1 of any year) apply to routine mowing and clearing of riparian areas. | The reduction in burden from this change is accounted for above in discussing clarifications for vegetation maintenance practices in Plan section VII.A.   | Est 2 variance filings avoided per year                     | 0    | 0   | 0         |
| VI.B.1.b. (Wetland Crossings - Installations)   | The project sponsor shall file with the Secretary for review and written approval by the Director, a site-specific construction plan for each extra work area with a less than 50-foot setback from wetland boundaries (except where adjacent upland consists of actively cultivated or rotated cropland or other disturbed land) and a site-specific explanation of the conditions that will not permit a 50-foot setback.   | The project sponsor shall file with the Secretary for review and written approval by the Director, a site-specific justification for each extra work area with a less than 50-foot setback from wetland boundaries (except where adjacent upland consists of actively cultivated or rotated cropland or other disturbed land). The justification must specify the site-specific conditions that will not permit a 50-foot setback and measures to ensure the wetland is adequately protected. This requirement does not apply to projects constructed under automatic authorization.   | The reduction in burden from this change is addressed above in discussing changes to section II.B.   | Section 7, Blanket PN, and NGPA 311 advanced notice filings | 0    | 83  | 0         |
| VI.B.1.d. (Wetland Crossings - Installations)   | The only access roads, other than the construction right-of-way, that can be used in wetlands, are those existing roads that can be used with no modifications or improvements, other than routine repair, and no impact on the wetland.  | The only access roads, other than the construction right-of-way, that can be used in wetlands, are those existing roads that can be used with no modifications or improvements, other than routine repair, and no impact on the wetland.   | This will not result in any new burden. All access roads, other than public roads, need Director approval for use. The language was confusing and the intent is to discourage use of access roads in wetlands unless they can be used "in kind" without additional wetland impacts.                    | All Filings   | -0.5 | 218 | -109      |
| VI.B.2.f. (Wetland Crossings - Installations)   | Not in current Procedures. Add statement to address burning in wetlands.  | The project sponsor can burn woody debris in wetlands, if approved by the COE and in accordance with state and local regulations, ensuring that all remaining debris, including ash, is removed for disposal.  | This revision is proposed to eliminate the need to file a variance request. Burning in wetlands was not previously addressed in the Procedures, but staff considers it consistent with guidance we typically provide for projects in the south with extensive and heavily vegetated wetland complexes. | 0.25 of All Filings   | -5   | 55  | -275      |
| VI.D. (Post Construction Maintenance and Reporting)   | Do not conduct vegetation maintenance over the full width of the permanent right-of-way in wetlands. However, to facilitate periodic pipeline corrosion/leak surveys, a corridor centered on the pipeline and up to 10 feet wide may be maintained in a herbaceous state. In addition, trees within 15 feet of the pipeline that are greater than 15 feet in height may be selectively cut and removed from the permanent right-of-way.   | 1. Do not conduct routine vegetation <u>mowing or clearing</u> over the full width of the permanent right-of-way in wetlands. However, to facilitate periodic corrosion/leak surveys, a corridor centered on the pipeline and up to 10 feet wide may be cleared at a frequency necessary to maintain the 10-foot corridor in an herbaceous state. In addition, trees within 15 feet of the pipeline with roots that could compromise the integrity of pipeline coating may be selectively cut and removed from the permanent right-of-way. Do not conduct any routine vegetation mowing or clearing in wetlands that are between HDD entry and exit points. 3. Time of year restrictions specified in section VII.A.5 of the Plan (April 15 – August 1 of any year) apply to routine mowing and clearing of riparian areas.  | The reduction in burden from this change is accounted for above in discussing clarifications for vegetation maintenance practices in Plan section VII.A.   | Est 2 variance filings avoided per year                     | 0    | 0   | 0         |
| VI.D. (Post Construction Maintenance and Reporting)   | Monitor and record the success of wetland revegetation annually for the first 3 years after construction or until wetland revegetation is successful. At the end of 3 years after construction, file a report with the Secretary identifying the status of the wetland revegetation efforts. Include the percent cover achieved and problem areas (weed invasion issues, poor revegetation, etc.). Continue to file a report annually until wetland revegetation is successful.   | Monitor and record the success of wetland revegetation annually for the first 3 years after construction or until wetland revegetation is successful. Within 3 years after construction, file a report with the Secretary identifying the status of the wetland revegetation efforts, documenting the criteria defined in section VI.D.4, below. The requirement to file wetland restoration reports with the Secretary does not apply to projects constructed under the automatic authorization, prior notice, or advance notice provisions in the FERC's regulations.  | The edits suggested here clarify common guidance but will represent an increase in reporting burden. Companies will need to adjust their training and procedures in preparing these reports to reflect the new criteria.   | Section 7   | 5    | 45  | 225       |
| VI.D. (Post Construction Maintenance and Reporting)   | If revegetation is not successful at the end of 3 years, develop and implement (in consultation with a professional wetland ecologist) a remedial revegetation plan to actively revegetate the wetland. Continue revegetation efforts until wetland revegetation is successful.   | For any wetland where revegetation is not successful at the end of 3 years after construction, develop and implement (in consultation with a professional wetland ecologist) a remedial revegetation plan to actively revegetate wetlands. Continue revegetation efforts and file a report annually documenting progress in these wetlands until wetland revegetation is successful.   | This revision would represent a new annual reporting requirement for projects where wetlands are not successfully revegetated within 3 years after construction. Although we do not have failure data, we estimate a very low percentage of wetlands fail – 10 percent.                                | .10 of Section 7  | 40   | 5   | 200       |
| VII (Hydrostatic Testing)   | If pumps used for hydrostatic testing are within 100 feet of any waterbody or wetland, address the operation and refueling of these pumps in the project's Spill Prevention and Response Procedures.  | If pumps used for hydrostatic testing are within 100 feet of any waterbody or wetland, address secondary containment and refueling of these pumps in the project's Spill Prevention and Response Procedures.   | This clarifies the intent of the statement and represents no new reporting burden.   | All Filings   | 0    | 218 | 0         |
|   |   |  |  |   | 52.5 |     | -905      |
|   |   |  |  |   |      |     | TOTAL 762 |
| <b>FY11</b>   | <b>Regulation Section<br/>18 CFR ...</b>  | <b>Regulation Topic</b>  | <b>Number of Respondents*</b>  | <b>Number of Filings or Responses*</b>                      |      |     |           |
| Plan Updates  | 157.5-.11; & 157.13-.20   | Interstate certificate and abandonment applications  | 35 companies   | 50  |      |     |           |
|   | 157.201-.209; 157.211; 157.214-.218;  | Blanket Certificates - prior notice filings  | 16 companies   | 27  |      |     |           |
|   | 157.201-.209; 157.211; 157.214-.218;  | Blanket Certificates -- annual reports   | 30 companies   | 31  |      |     |           |
|   | 284.11;   | NGPA Sec. 311 Construction - advanced notifications  | 2 companies  | 3   |      |     |           |
|   | 284.11;   | NGPA Sec. 311 Construction - annual reports  | 2 companies  | 2   |      |     |           |
|   |   | <b>TOTAL</b>   |  | <b>113</b>  |      |     |           |
| *Data based on FY11 completions in DG2E project tracker database, excluding projects that were NEPA categorical exclusions or otherwise labeled "environment not involved." |   |  |  |   |      |     |           |