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June 22, 2016

Via E-Mail & FedEx

Acton Conservation Commission
Town of Acton
472 Main Street
Acton, MA 01720

**Re: Notification of Pipeline Maintenance Activities
Tennessee Gas Pipeline Company – 200-2 Line
Town of Acton, Middlesex County, Massachusetts
[HMM Project No. 364638AB01]**

To whom it may concern at the Acton Conservation Commission:

On behalf of Tennessee Gas Pipeline Company (TGP), Hatch Mott MacDonald (HMM) is providing notification to the Acton Conservation Commission of TGP's intent to perform mechanical vegetation maintenance activities on its existing 200-2 Line in the Town of Acton. Work is expected to take place from August 2016 through March 2017.

To facilitate compliance with 49 C.F.R., Part 192, Subpart L (Operations) and Subpart M (Maintenance), Tennessee Gas Pipeline (TGP) conducts periodic vegetation maintenance activities on its permanent easements. TGP must maintain its easements for a variety of reasons:

- to allow for aerial and other types of surveillance of the pipeline,
- to comply with its Damage Prevention Program,
- to facilitate planned cathodic protection surveys, and
- to allow access for both routine pipeline maintenance and emergency repairs by maintaining its right of ways (ROWs) free of encroaching vegetation that may impede visual and physical access to the pipeline.

This work is exempt "maintenance," for which governmental permits and approvals are not required under the Massachusetts Wetlands Protection Act (M.G.L. 131 § 40) and Section 404(f)(1)(b) of the Clean Water Act. TGP must perform this necessary maintenance work to support TGP's pipeline integrity program, which is required by the U.S Department of Transportation Pipeline and Hazardous Materials Safety Administration.

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Listed below are the 2016 – 2017 planned vegetation maintenance program (VMP) activities for the Massachusetts ROWs:

Planned Mechanical Vegetation Control

TGP maintains its ROWs on a three to five year cycle. A description of the maintenance work and area is included below:

2016 – 2017 Locations to be mowed and side-trimmed

Pipeline	ROW Width
200-2 Line	50 feet

Equipment to be used

TGP contractors employ tractors with rotary mowers where site conditions allow their use. In areas too saturated to support wheeled tractors, hand held brush trimmers are utilized. Existing permanent stream crossings are utilized by equipment. All ruts on ROW are repaired. Additionally, TGP contractors employ tractor mounted aerial buckets and/or ground crews with chain saws to perform side-trimming at edge of ROW.

Existing restrictions

In general, TGP is restricted from mowing its ROW from April 15th to August 1st on a calendar year. Mowing operations are also restricted by excessive snow cover. In addition, TGP’s Federal Energy Regulatory Commission FERC Certificates may contain additional maintenance restrictions. FERC Certificate restrictions potentially pertaining to the mowing program are:

- Upland Maintenance: ROW vegetation maintenance shall not be done more frequently than every three years, and not before August 1st of any year.
- Waterbody Maintenance: Do not mow within 25-feet of the top of the waterbody bank; however, a 10-foot wide corridor centered on the pipeline may be mowed annually. Trees within 15-feet of the pipeline that are greater than 15-feet in height may be selectively cut and removed from the permanent ROW.
- Wetland Maintenance: Wetlands must be allowed to naturally revegetate. DO NOT mow the full width of the ROW in a wetland at any time. A 10-foot wide corridor centered on the pipeline may be mowed annually. Trees within 15-feet of the pipeline that are greater than 15-feet in height may be selectively cut and removed from the permanent ROW.

Again, as noted above, this work is exempt “maintenance,” for which governmental permits and approvals are not required under the Massachusetts Wetlands Protection Act (M.G.L. 131 § 40) and Section 404(f) (1)(b) of the Clean Water Act.



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Please contact me using the information below with any questions or if you need additional information.

Respectfully,

Hatch Mott MacDonald

A handwritten signature in black ink, appearing to read "Theresa Albanese".

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cc: Toya Campbell (TGP)
Doug Gibbons (HMM)
Sara Kreisel (HMM)