

November 13, 2024

The Honorable Debbie-Anne Reese, Secretary Federal Energy Regulatory Commission 888 First Street, N.E. Washington, D.C. 20426 **Gas Transmission Northwest LLC** 700 Louisiana Street, Suite 1300 Houston, TX 77002-2700

David A. Alonzo Manager, Project Authorizations

tel 832.320.5477

email david_alonzo@tcenergy.com
web www.tcenergy.com

Re: Gas Transmission Northwest LLC

Docket No. CP22-2-000 GTN XPress Project

Request for Authorization to Place Auxiliary Facilities at the Kent Compressor Station into Service for Existing System Operations

Dear Ms. Reese:

On October 23, 2023, the Federal Energy Regulatory Commission ("FERC" or "Commission") issued an Order Issuing Certificate ("Certificate Order") in the above-referenced docket authorizing Gas Transmission Northwest LLC ("GTN") to construct and operate the GTN XPress Project ("Project"). ¹ GTN filed to accept the Certificate Order on January 30, 2024. On July 26, 2024, GTN commenced construction of the Project.

As part of the Project, GTN is installing auxiliary facilities at the Kent Compressor Station, consisting of four additional gas cooling bays, associated piping, and appurtenances ("Auxiliary Facilities"). Pursuant to Environmental Condition No. 10 of the Certificate Order, GTN respectfully requests written authorization from the Director of the Office of Energy Projects by November 22, 2024, to place the Auxiliary Facilities at the Kent Compressor Station into service.

GTN anticipates mechanical completion of the Auxiliary Facilities to occur on November 21, 2024, and will provide FERC staff notice of mechanical completion once the milestone is achieved. GTN notes it is not requesting to place Project capacity into service at this time. Once the Auxiliary Facilities at the Kent Compressor Station are placed into service, they will be utilized as needed to support GTN's existing system operations. GTN will submit a separate request to place the remaining Project facilities and capacity into service when the Starbuck Compressor Station upgrades near completion.

In support of GTN's request to place the Auxiliary Facilities at the Kent Compressor Station into service, GTN is providing supporting photographic documentation of the ongoing construction and restoration activities in Attachment A. The table below outlines the status and estimated completion timelines for the remaining construction and restoration activities at the station.

¹ Gas Transmission Northwest LLC, 185 FERC ¶ 61,035 (2023).

Kent Compressor Station Construction and Restoration Status		
Restoration Type	Current Percent Complete	Estimated Completion Date
Backfill*	75%	11/22/2024
Final Grading	20%	12/4/2024
Full Site Restoration	30%	12/9/2024
Permanent Fencing, Gates and Stone	0%	12/18/2024

^{*}Remaining backfill to be complete after new piping has been hydrotested.

The majority of the outstanding activities are focused on site restoration and finishing work within the existing compressor station boundaries. Most of these remaining tasks can be accomplished in a short period of time once the primary construction is mechanically complete. As noted above, GTN anticipates full site restoration to be achieved by December 2024.

GTN confirms that is has not received any non-compliances or identified any problem areas related to the Auxiliary Facilities at the Kent Compressor Station from FERC or any other regulatory agency. Additionally, GTN has not had any landowner complaints at this location, either through direct contact with its land agents, or through the FERC hotline. GTN remains firmly committed to addressing any landowner issues or concerns that may arise during the construction and restoration phases of the remaining Project facilities.

GTN submits that it has met all of the conditions in the Certificate Order to place the subject Auxiliary Facilities into service and re-affirms its commitment to comply with all remaining conditions of the Certificate Order. Based on the support provided herein, GTN respectfully requests written authorization from the Director of the Office of Energy Projects by November 22, 2024, to place the Auxiliary Facilities at the Kent Compressor Station into service.

GTN is submitting this filing in accordance with the Commission's Order No. 703, *Filing Via the Internet* guidelines, issued in the Docket No. RM07-16-000 on November 15, 2007. Pursuant to 18 C.F.R § 385.2010 of the Commission's regulations, a copy of this letter is being served to each person whose name appears on the official service list for this proceeding.

Pursuant to 18 C.F.R.§ 385.2005 of the Commission's regulations, the undersigned states that he has read this filing and know its contents, and the contents are true as stated, to the best of his knowledge, information and belief based on representations by GTN personnel. The undersigned possesses full power and authority to sign such filing.

Please direct any questions regarding this submission to Daniel Humble at 832.320.5583.

Respectfully submitted,

/s/ David A. Alonzo

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cc: Gertrude Fernandez Johnson (FERC)

James Martin (FERC) Eric Tomasi (FERC)

All parties of record (CP22-2)

Gas Transmission Northwest LLC GTN XPress Project CP22-2-000

Attachment A

Photographic Documentation



Kent Compressor Station

Photo Log



Existing Facility • Facing North (45.127593, -120.614138): The photo was taken from the southeastern corner of the existing facility and shows the section that will require restoration, all of which will be gravel.

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Existing Permanent Access Road • Facing Northwest (45.127786, -120.614927): The photo was taken from the southeast end of the access road.

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Existing Permanent Access Road • Facing Southeast (45.128639, -120.615685): The photo was taken from the northwest end of the access road.

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Permanent Easement • Facing Northeast (45.128671, -120.613023): The photo shows the impacted section of the permanent easement, which is on the northeast side of the existing facility.

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Modified Permanent Access Road • Facing Southwest (45.127841, -120.615045): The photo was taken looking toward the public roadway. The access road is part of an existing gravel pad.

Page **5** of **12** Revised: 11/7/2024



Temporary Workspace • Facing Northwest (45.128687, -120.613025): The photo was taken from the northeastern boundary of the existing facility.

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Temporary Workspace • Facing Northwest (45.128687, -120.613025): The photo was taken from the northeastern boundary of the existing facility.

Page **7** of **12** Revised: 11/7/2024



Proposed Facility • Facing North (45.127434, -120.614627): The photo shows the new gas cooler and an adjacent area that will require restoration.

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Proposed Facility • Facing West (45.127407, -120.614019): The photo was taken from the southeastern boundary of the proposed facility. The new gas cooler can be seen in the background.

Page **9** of **12** Revised: 11/7/2024



Temporary Workspace • Facing Northeast (45.129023, -120.613882): The photo shows temporary workspace that used for spoil storage.

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Temporary Workspace • Facing Southwest (45.129688, -120.612768): The photo shows temporary workspace that used for spoil storage.

Page **11** of **12** Revised: 11/7/2024



Temporary Workspace • Facing North (45.127154, -120.612740): The photo was taken from the public roadway. The road on the right side of the photo is an existing gravel road, which is inside the temporary workspace. The grassy area on the left side of the photo also is inside the temporary workspace, most of which was not disturbed.

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