Mr. Ronald Schwartz, Director  
Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

April 17, 2018

RE: Shell Pipeline Company LP’s Falcon Ethane Pipeline System’s Applications for Chapter 102, Erosion and Sediment Control General Permit for Earth Disturbance Associated with Oil and Gas Exploration, Production, Processing or Treatment Operations or Transmission Facilities (ESCGP-2) and Chapter 105 Water Obstruction and Encroachment Permit Applications

On behalf of the Pennsylvania Chamber of Business and Industry (PA Chamber), the largest, broad-based business advocacy organization in the Commonwealth, I am writing in support of Shell Pipeline Company LP’s applications for authorizations and permits under Chapters 102 and 105 for the Falcon Ethane Pipeline System, as published in the Feb. 17, 2018 volume of the Pennsylvania Bulletin (48 Pa.B. 9). The PA Chamber thanks the Department for their thorough, thoughtful and extensive review of this project and urges a final determination, granting these permits and authorizing construction for this important project, be made as quickly as possible.

Pennsylvania’s Chapter 105 regulations (relating to waterways and wetlands encroachments) note in particular that an application will be approved provided the Department finds “that the public benefits of the proposed project outweigh the harm to the environment and public natural resources.” These benefits may include protection of public health and safety, development of energy resources, creation or preservation of significant employment, provision of public utility services, and other essential social and economic development which benefits a substantial portion of the public (§ 105.16(b)).

Authorizations under Chapters 102 and 105 are necessary for the construction of the Falcon Ethane Pipeline, infrastructure which is essential to the operation of Shell’s petrochemical facility in Monaca. As it relates to the preservation or creation of significant employment, it is expected the construction of the facility will employ more than 6,000 workers and regular operations of the facility will employ another 600. Further, this facility and the supported jobs are expected to create, support, sustain and attract additional business development into manufacturing, service, hospitality and supply chain.

The on-going operations of the petrochemical project will support and sustain the development of natural gas liquids from nearby shale plays, such as the Marcellus and Utica, as well as the continued employment of the workers in the exploration and production industry and in the associated service and supply chain sectors.

With respect to broader economic development benefitting a substantial portion of the public, the pipeline will supply the petrochemical facility with the commodity necessary to produce polyethylene pellets, which are then used to develop plastics used in a host of products necessary and useful to modern life – among them, tires, diapers, medical devices, and food safety products.
These benefits are substantial, and fall within the relevant categories of public benefits that § 105.16(b) authorizes the Department to consider in balance to any environmental impact. The PA Chamber urges that the Department find these benefits to outweigh any impacts – impacts which the published draft permits note will be largely temporary and appropriately avoided and mitigated as required by statute and regulation.

Given the significant economic benefits that will be realized with the construction and operation of this project, which will be managed using appropriate environmental measures and in compliance with relevant state and federal requirements, I urge you to grant final approval of these Chapter 102 and 105 permits for this project.

Sincerely,

Gene Barr
President and CEO