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VINCENT M. PEREZ
COUNTY COMMISSIONER
PRECINCT THREE

July 6, 2015

Chairman Norman Bay
Federal Energy Regulatory Commission
888 First St., N.E.
Washington, DC, 20426
RE: CP15-500 & CP15-503

Dear Chairman Bay,

Please accept this letter as a formal request to have the Federal Energy Regulatory Commission further review Energy Transfer Partners' (ETP) proposed *Comanche Pipeline (CP15-503)* and the federal requirements associated with it and its companion project, the *Trans-Pecos Pipeline (CP15-500).*

Texas Counties, as administrative arms of the State, are primarily charged with providing for the health, safety and welfare of their residents and communities. Despite this charge, counties are the least empowered and most regulated form of local government in the state, lacking the statutory authority to regulate land-use issues such as these.

El Paso County has become increasingly urbanized; traditionally rural areas are becoming suburban communities with higher populations and denser neighborhoods. The population of the affected area has grown significantly. If an emergency incident were to occur, the 30,000 residents that call this area home would be in danger, including the students of two elementary and two high schools near the proposed line.

Also of concern is the high concentration of similar pipelines in a narrow geographic corridor; with the installation of these and other pipelines, the area could see as many as six lines, exponentially increasing the potential threat to the public if an incident were to occur. Furthermore, the Texas Railroad Commission (TRRC), the state regulatory agency charged with monitoring proposals such as the *Comanche*, has set no cap for the installation of such pipelines.

Despite being granted a permit from the TRRC as an intrastate system, the proposed line serves no intrastate customers, raising concerns that the applicant may be attempting to segment a larger project into two separate jurisdictional segments: *Comanche & Trans-Peco*. These smaller proposals would be less likely to trigger federal oversight and requirements, including thorough environmental and cultural assessments.

I respectfully urge you to review the proposed projects to determine which federal requirements must apply to the ***entire length of the pipeline***, including the possibility that FERC should in fact have regulatory jurisdiction over the proposal.

Regards,

Vincent M. Perez
El Paso County Commissioner Precinct 3

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