



May 22, 2017

**Filed Electronically**

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, NE, Room 1A  
Washington, DC 20426

Re: Request for Rescission of Certificate of Public Convenience, Docket No. CP13-83-000

Dear Ms. Bose:

On behalf of intervenor Gas Free Seneca, we respectfully request that the Federal Energy Regulatory Commission (“FERC” or the “Commission”) rescind the Certificate of Public Convenience and Necessity issued to Arlington Storage Company, LLC (“Arlington”) for expansion of its Seneca Lake gas storage facility (“Gallery 2 Expansion Project”). *See* Order Issuing Certificate and Reaffirming Market-Based Rates, 147 FERC ¶ 61,120 (May 15, 2014) (“Certificate Order”). In its Bi-Weekly Environmental Compliance Report, dated May 9, 2017 (a copy of which is annexed as Exhibit A hereto), Arlington admitted:

Despite its best efforts, Arlington has not been successful in securing long-term contractual commitments from customers that would support completion of the Gallery 2 Expansion Project. . . . [B]ids for firm storage capacity which Arlington has received from time to time are not adequate to support the investment required to bring the project to completion. Accordingly, Arlington has discontinued efforts to complete the Gallery 2 Expansion Project.

Arlington’s admission confirms that there is no need for the Gallery 2 Expansion Project and no grounds for authorizing its construction. Because Arlington has “discontinued efforts” to expand its facility, it is clear that the public convenience and necessity no longer require the project, and the Certificate Order should be rescinded. *See Wyoming-California Pipeline Co.*, 70 FERC ¶ 61,041, 61,130 (Jan. 19, 1995) (rescinding order for lack of need).

Respectfully submitted,

Deborah Goldberg  
Managing Attorney

# **Exhibit A**

**Arlington Storage Company, LLC**  
**BI-WEEKLY ENVIRONMENTAL COMPLIANCE REPORT**

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**Project:** Seneca Gallery 2 Project

**FERC Docket No.** CP13-83-000

**Date:** May 9, 2017

**Prepared By:** James Johnston

**Period From:** April 24, 2017

**Through:** May 7, 2017

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**Summary of Current Construction; Work Planned for the Next Reporting Period; and Schedule Changes:**

**A. Describe work completed through this period (See status table below):**

**Pipeline**

Work has not commenced to date.

**Compressor**

Work has not commenced to date.

**Wells**

Work has not commenced to date.

**Progress Status Table for Project Facilities (Percent Complete)**

<b>Activities</b>	<b>Pipeline</b>	<b>Compressor</b>	<b>Wells</b>
Clearing	0	0	0
Grading	0	0	0
Stringing	0	0	0
Trenching	0	0	0
Retention Ponds	0	0	0
Foundations	0	0	0
Buildings	0	0	0
Electric	0	0	0
Piping	0	0	0
Backfill	0	0	0
Final Clean-up	0	0	0
Hydrostatic test	0	0	0
Restoration	0	0	0

**B. Describe Work Planned for Next Period:**

Since receiving Federal Energy Regulatory Commission authorization in May 2014 to undertake the Gallery 2 Expansion Project, Arlington has continued to pursue New York State Department of Environmental Conservation clearance to convert Gallery 2 to natural gas storage service while at the same time marketing the incremental firm storage services the project would support. The Commission has recognized Arlington's diligence, as well as

Arlington's efforts to accommodate the New York DEC's underground storage approval process, most recently in its May 16, 2016 order granting Arlington a two-year extension of time to construct the project. *Arlington Storage Co., LLC*, 155 FERC ¶ 61,165.

Despite its best efforts, Arlington has not been successful in securing long-term contractual commitments from customers that would support completion of the Gallery 2 Expansion Project. While demand for high-deliverability natural gas storage services remains robust in New York, as evidenced by the fully contracted status of Arlington's storage company affiliate Stagecoach Pipeline & Storage Company, LLC, bids for firm storage capacity which Arlington has received from time to time are not adequate to support the investment required to bring the project to completion. Accordingly, Arlington has discontinued efforts to complete the Gallery 2 Expansion Project.

Arlington appreciates the efforts which the Commission's staff has expended in its review of the Gallery 2 Expansion Project and its management of this proceeding.

**C. Schedule Changes:**

The schedule is currently suspended.

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**Problems Encountered and Each Instance of Non-Compliance Observed by Environmental Inspector; Corrective Actions Implemented and Their Effectiveness; and Cost Associated with Corrective Actions:** N/A

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**Landowner/Resident Complaints and Measures Taken to Satisfy Concerns:** N/A

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**Agency Correspondence received by Arlington for Non-Compliance and Arlington's Response:** N/A

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**Miscellaneous Comments (i.e. notification, meetings):**

**Meetings:** None

**Notifications:** None

**Site-Specific Residential Plans:** N/A

**Workspace Revisions:** None

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**Unresolved Regulatory Issues:**  
N/A