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June 18, 2025

Ms. Tanowa Troupe Secretary, Office of Administration Ohio Power Siting Board 180 East Broad Street Columbus, Ohio 43215

Re: In the Matter of the Letter of Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for an Adjustment to the Agler NCHP Pipeline Project

OPSB Case No. 25-0653-GA-BNR

## Dear Ms. Troupe:

Columbia Gas of Ohio, Inc. ("Columbia") submits this Construction Notice, pursuant to Adm.Code 4906-6-03(B) and 4906-6-05, concerning a slight modification ("Adjustment") in one area of a proposed pipeline relocation that was previously approved by the Ohio Power Siting Board ("OPSB") known as the Agler NCHP Pipeline Project (the "Project") in Case No. 24-1126-GA-BLN, with an adjustment of the Project approved in Case No. 25-0523-GA-BNR.

Columbia also requests, pursuant to Adm.Code 4906-6-03(B) and 4906-6-04, expedited treatment of this Construction Notice for good cause. Good cause exists to grant expedited treatment as the Adjustment is minor, and approval will also allow Columbia to place the first portion of the Project in-service in 2025. Columbia requests a certificate effective date of August 11, 2025.

Therefore, as required by Adm.Code 4906-6-05, please be advised of the following Adjustment with this Construction Notice focusing on only the area that changed in the previously approved route:

(1) Provide the name of the project and applicant's reference number, a brief description of the project, and why the project meets the requirements for a letter of notification or construction notice application.

In Case 24-1126-GA-BLN, the OPSB approved Columbia's Letter of Notification to construct the Project which is generally located in the City of Columbus and City of Gahanna. In Case No. 25-0523-GA-BNR, the OPSB approved an adjustment to the Project. The Project, once completed, will be approximately 19,914 feet (3.8 miles) in length and consists of 24-inch diameter high pressure gas transmission class pipeline.

This Construction Notice requests an Adjustment to the Project route that totals less than one mile. The addition of the temporary tie-in does not constitute any changes to the previously planned workspace or change in construction installation method. This adjustment is as follows:

No.	Station Location	Description of Change	A.S. #	Reason for Change
1	74+50 to 75+10	Pipeline work will tie-in at the intersection of Gatewood Rd and Agler Rd within the City of Columbus	L-2009	To install a temporary tie-in

• Adjustment: The Adjustment includes the installation of a temporary gas main tie-in east of the Gatewood Road and Agler Road intersection. The location of this tie-in is south of 3175 Agler Rd at approximately 40.020721, -82.923206.

The areas highlighted on **Attachments A** and **B**, called out as "Adjustment," are the impacted areas that have changed from the previous Project approval.

(2) If the proposed project is a gas pipeline, the applicant provide a statement explaining the need for the proposed facility.

The Adjustment will allow Columbia to place in-service for customers the first portion of new pipe installed as part of the Project.

(3) Provide the location of the project in relation to existing or proposed lines shown on an area system map of sufficient scale and size to show existing and proposed transmission facilities in the project area.

The map shown in **Attachment A**: Overview Map illustrates the location of the Project in relation to existing transmission facilities in the Project area. The new pipeline is shown in red and the workspace for constructing the new pipeline is a black-dashed line. The existing NCHP pipeline that will be replaced is the cyan line.

**Attachment A** also highlights in yellow the Adjustment along the proposed pipeline route.

(4) Describe the alternatives considered and reasons why the proposed location or route is best suited for the proposed facility, including, but not be limited to, impacts associated with socioeconomic, ecological, construction, or engineering aspects of the project.

Columbia considered installing the tie-in further west, on Agler Road, but construction at that location would create more disruption to residents and would cause the Citygate Road and Agler Road intersection to be closed as compared to the location chosen and included in this construction notice application.

Columbia notes that the alignment shift is still within the originally investigated workspaces for the Project and did not change any of the previously provided environmental reports. Please see **Attachment A** and **B** for the map(s) showing the Adjustment within the originally approved corridor.

(5) Describe its public information program to inform affected property owners and residents of the nature of the project and the proposed timeframe for project construction and restoration activities.

Columbia will continue to utilize the same public information campaign as originally explained in Case No. 24-1126-GA-BLN. No additional public information efforts are planned given the minor nature of the Adjustment.

(6) Provide an anticipated construction schedule and proposed in-service date of the project.

At the present time, Columbia anticipates installation of the Project from the western limits of the Project to Citygate Drive to begin in June 2025 and complete by December 31, 2025, which includes the Adjustment. Columbia expects construction going east into Gahanna, to the limits of the Project as presented within the LON, to begin in the spring of 2027 and to complete work by December 31, 2027.

(7) Provide a map of at least 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image

Please see the map attached as **Attachment A**.

**Attachment B** is comprised of the pipeline alignment drawings and the pipeline workspace drawings that contain area maps at a 1" = 40' scale. The maps and drawing depict the Project centerline, workspaces, and major street crossings. The Project centerline is shown as a dashed red line, and workspaces are shown as cyan-hatched areas bounded by dashed black lines for workspace within public right-of-way; grey-hatched areas bounded by dashed blue lines for permanent easement within private parcels; and pink-hatched areas bounded by dashed black lines for temporary easement within private parcels. Roads, streets, highways, and other crossings are clearly labeled throughout.

(8) Provide a list of properties for which the applicant has obtained easements, options, and/or land use agreements necessary to construct and operate the facility and a list of the additional properties for which such agreements have not been obtained.

Please see the list of property owners for the entire Project is included as **Attachment D.** There are no additional parcels or easements needed for the Adjustment as the Adjustment is within the existing workspace/established easements.

- (9) Describe the following information regarding the technical features of the project.
  - (a) Operating characteristics, estimated number and types of structures required, and right-of-way and/or land requirements.

The Adjustment will, like the rest of the Project, be tested such that they will have an MAOP of 190 pounds per square inch gauge (PSIG). Columbia will be installing 24-inch mainline piping that is coated steel with a wall thickness of 0.375.

Please see **Attachment D** for a list of property rights acquired for the Project. The location of the workspaces, easements, and right-of-way are also shown in the drawing included in **Attachment B**.

- (b) For electric power transmission lines that are within one hundred feet of an occupied residence or institution, the production of electric and magnetic fields during the operation of the proposed electric power transmission line, describe:
  - (i) Calculated electric and magnetic field strength levels at one meter above ground under the lowest conductors and at the edge of the right-of-way for:
    - (a) Normal maximum loading,
    - (b) Emergency line loading,
    - (c) Winter normal conductor rating.
  - (ii) The applicant's consideration of design alternatives with respect to electric and magnetic fields and their strength levels, including alternate conductor configuration and phasing, tower height, corridor location, and right-of-way width.

Not applicable to this Project.

(c) The estimated cost of the project.

The Adjustment does not cause a material increase to the Project.

- (10) The applicant shall describe the social and ecological impacts of the project. Examples of relevant information include.
  - (a) Provide a brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Adjustment is located within the City of Columbus, Franklin County, Ohio. The current land use of the Adjustment is primarily comprised of residential and municipal properties.

(b) Provide the acreage and a general description of all agricultural land, and separately all agricultural district land, existing at least sixty days prior to submission of the application within the potential disturbance area of the project.

No Agricultural District Land parcels are impacted by the Adjustment.

(c) Provide a description of the applicant's investigation concerning the presence or absence of significant archeological or cultural resources that may be located within the potential disturbance area of the project, a statement of the

findings of the investigation, and a copy of any document produced as a result of the investigation.

On behalf of Columbia, Colliers Engineering & Design ("CED") conducted a cultural resource desktop review and assessment for the entire Project. The Adjustment in the alignment for the minor shift was covered within the original surveys covering the workspace originally surveyed for the entire route, and does not cause any new archaeological or cultural resources impacts as compared to the original Project approval.

A copy of the Cultural Report and correspondence with the State Historic Preservation Office ("SHPO") is included in **Attachment G.** 

(d) Provide a list of the local, state, and federal governmental agencies known to have requirements that must be met in connection with the construction of the project, and a list of documents that have been or are being filed with those agencies in connection with siting and constructing the project.

The following public officials and offices will be notified of the Construction Notice pursuant to Adm.Code 4906-6-07(A)(1):

City of Columbus				
Hon. Andrew Ginther	Shannon G. Hardin			
City of Columbus Mayor	City of Columbus Council President			
90 W. Broad Street	90 W. Broad Street			
Columbus, Ohio 43215	Columbus, Ohio 43215			
Nancy Day-Achauer	Nicholas Bankston			
Councilmember	Councilmember			
90 W. Broad Street	90 W. Broad Street			
Columbus, Ohio 43215	Columbus, Ohio 43215			
Lourdes Barroso de Padilla	Rob Dorans			
Councilmember	President Pro Tem			
90 W. Broad Street	90 W. Broad Street			
Columbus, Ohio 43215	Columbus, Ohio 43215			

Otto Beatty	Emmanuel V. Remy		
Councilmember	Councilmember		
90 W. Broad Street	90 W. Broad Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		
Melissa Green	Christopher L. Wyche		
Councilmember	Councilmember		
90 W. Broad Street	90 W. Broad Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		
Scott Messer	Kelly Scocco		
City of Columbus Director	City of Columbus Director		
Department of Building and Zoning Services	Department of Public Service		
111 N. Front Street	111 N. Front Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		

Franklin County				
John O'Grady	Kevin L. Boyce			
Franklin County Commissioner	Franklin County Commissioner			
President	373 S. High Street			
373 S. High Street	Columbus, Ohio 43215			
Columbus, Ohio 43215				
Erica C. Crawley	Kenneth N. Wilson			
Franklin County Commissioner	Franklin County Administrator			
373 S. High Street	373 S. High Street			
Columbus, Ohio 43215	Columbus, Ohio 43215			
Jennifer Fish	Adam W. Fowler, P.E., P.S.			
Franklin County Soil and Water	Franklin County Engineer			
1404 Goodale Boulevard, Suite 100	970 Dublin Road			
Columbus, Ohio 43212	Columbus, Ohio 43215			

In addition to submitting this Construction Notice to the OPSB, the overall Project is subject to the following federal, state, and local agency reviews and authorizations to be received prior to beginning construction:

- U.S. Army Corps of Engineers (USACE) Nationwide Permit 12 Evaluation;
- Ohio Department of Natural Resources (ODNR) State Threatened and Endangered Species Consultation;

- Ohio Environmental Protection Agency (OEPA) Section 402 National Pollutant Discharge Elimination System (NPDES) Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements;
- City of Columbus Department of Public Service ROW Excavation Permit;
- Norfolk Southern Railroad Right of Entry Permit;
- Norfolk Southern Railroad Wireline and Pipeline License;
- CSX Right of Entry Permit;
- CSX Utility Permit;
- Ohio Department of Transportation Right-of-Way and Utility Permit; and
- Ohio EPA Hydrostatic Test Water Discharge Permit.

Columbia also submitted to the City of Columbus/Gahanna a Maintenance of Traffic Plan, which is included as **Attachment H**.

(e) Provide a description of the applicant's investigation concerning the presence or absence of federal and state designated species (including endangered species, threatened species, rare species, species proposed for listing, species under review for listing, and species of special interest) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

The Adjustment does not present any new potential impacts to federal and state designated species. The original applicable correspondence and documentation, as continue to be applicable to the Adjustment, are attached as **Attachment E**.

(f) Provide a description of the applicant's investigation concerning the presence or absence of areas of ecological concern (including national and state forests and parks, floodplains, wetlands, designated or proposed wilderness areas, national and state wild and scenic rivers, wildlife areas, wildlife refuges, wildlife management areas, and wildlife sanctuaries) that may be located within the potential disturbance area of the project, a statement of the findings of the investigation, and a copy of any document produced as a result of the investigation.

An environmental review of the Project area was conducted on behalf of Columbia by its contractor, Campos EPC, LLC for the entire route. The surveyed area for the original environmental study is not impacted by the minor alignment shift in the Adjustment since the workspace does not change as a result of the minor alignment modifications. Columbia does not anticipate any different ecological impacts

caused by the Adjustment, and has attached **Attachment C**, which is the full Wetland Delineation Report and **Attachment F**, which is the Inadvertent Release Plan for the horizontal directional drilling.

(g) Provide any known additional information that will describe any unusual conditions resulting in significant environmental, social, health, or safety impacts.

To the best of Columbia's knowledge, no unusual conditions exist that would result in significant environmental, social, health, or safety impacts.

Should Staff of the Ohio Power Siting Board desire further information or discussion of this application, please do not hesitate to reach out to me at the information listed above.

Respectfully submitted,

/s/ Melissa L. Thompson