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September 2, 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 Construction Notification Application of Columbia Gas of Ohio, Inc. for a Certificate of Environmental Compatibility and Public Need for the Big Walnut Creek Crossing Pipeline Project.

OPSB Case No. 25-0829-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 proposed pipeline replacement known as the Big Walnut Creek Crossing Pipeline Project (the "Project"). The Project involves the replacement and installation of 1,465 feet of 24-inch coated steel pipeline with a Maximum Allowable Operating Pressure ("MAOP") of 650 psig.

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 construction would address a safety-related condition that may constitute an immediate danger or potentially cause an incident. This condition has been reported to the Public Utilities Commission of Ohio ("PUCO") and PHSMA. Expedited treatment is requested as the Construction Schedule has these impacted areas scheduled for September 24, 2025, to bolster public safety and avoid possible forced outages during winter. Therefore, as required by Adm.Code 4906-6-05, please be advised of the following:

(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 construction notice application.

The pipeline replacements are identified as the Big Walnut Creek Crossing Pipeline Project. Due to the age of the existing infrastructure and deteriorating conditions of the pipelines, the pipeline was determined by the Engineering, Operations, and Corrosion Teams to be in a condition that is detrimental to public safety. The Project proposes the replacement and installation of 1,465 feet of 24-inch coated steel pipeline at a maximum depth of 89 feet, but depending on conditions, the maximum depth may increase to 99 feet. The proposed approach is horizontal directional drill (HDD) under Big Walnut Creek. The Project location is shown on figures in **Attachment A**. The Project Route, currently shown to be the red dashed line, may be shifted within the Limits of Disturbance (LOD) identified in Attachment A. The existing pipeline will be retired and abandoned in place. The bore profile will be provided as a supplement to **Attachment A** of this application.

The Project meets the requirements of a Construction Notice as it is "New construction, extension, relocation, upgrade, or replacement (except with a like facility) of gas pipelines or pipelines segments as follows: (a) Pipelines or pipeline segments not greater than one mile in length." See Appendix B of Adm.Code 4906-1-01.

## (2) If the proposed construction notification project is a gas pipeline, a statement explaining the need for the proposed facility.

Columbia ran an inline inspection tool, which identified a dent in Columbia's pipeline located in the middle of Big Walnut Creek. Columbia deemed this to be a safety-related condition, and it has been reported to the Public Utilities Commission of Ohio ("PUCO") and PHMSA and needs to be remediated urgently. To address pipeline integrity concerns that have potential to impact public safety and avoid possible forced outages during winter operations, replacement pipeline installation is proposed for September 2025, thus requiring the need for expedited treatment.

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

**Attachment A**, Figure 1 is a topographic map demonstrating the centerline in red and the limits of disturbance in yellow at a scale of 1'' = 600'. Previously existing natural gas pipelines are marked in blue while nearby electric transmission lines are marked in purple.

(4) 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.

The proposed route was developed taking into consideration the current pipeline route, locations of existing gas distributions facilities where services must be maintained, private property, the density of below-grade utilities, impact to the public, and environmental features. The proposed route minimizes the number of residential homes and businesses directly affected by the Project. Installation methods have been selected to further limit impact to high traffic roads, other infrastructure such as railroads, environmental features, and trees. Tree clearing and trimming will occur along the pipeline route as needed for safe construction and pipeline operation purposes along the public right-of-way as well as for permanent and temporary easement areas. Columbia currently plans to HDD under Big Walnut Creek in Columbus to avoid the environmental impacts of alternative crossings, and the HDD will continue west of Sunbury Road in order to minimize impacts to the mature trees along that portion of the Project. This trenchless installation is also being pursued to avoid the traffic impacts to this vital thoroughfare. Sound barriers will be utilized when drilling is taking place to help mitigate noise impacts to the neighboring community. Since HDD is the proposed method of installation, an Inadvertent Release Plan has been prepared and is included as **Attachment F** with this application. Furthermore, alternative routes were deemed less practical since replacing the existing pipelines is dictated by existing utility infrastructure tie-ins and the location proposes the best access with the least amount of disruption to the environment and the residential area.

(5) Describe the 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 provide the notices required by the OPSB rules, including a copy of this Construction Notification (with attachments) posted in libraries, and notices to public officials. Columbia will have a dedicated e-mail address to receive inquiries from any interested stakeholder and will be responding to those inquiries.

(6) The anticipated construction schedule and proposed in-service date of project.

At the present time, Columbia anticipates installation of the proposed pipeline to begin on September 24, 2025, and to complete this work by November 15, 2025, with initial tree clearing commencing (as needed) in September. This timeframe and scope of work is subject to change based on evolving project planning and other variables, and Columbia will work with Columbus, Franklin County, and affected residents throughout the construction process.

(7) An area map of not less than 1:24,000 scale clearly depicting the facility and proposed limits of disturbance with clearly marked streets, roads, and highways, and an aerial image.

**Attachment A**, Figure 2 is an aerial map demonstrating the centerline in red and the limits of disturbance in yellow at a scale of 1'' = 200'. Parcel boundaries are highlighted in magenta. The Project Route, currently shown to be the red dashed line, may be shifted within the Limits of Disturbance (LOD) identified in Attachment A.

(8) 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.

A list of affected property owners is included in **Attachment** E.

As of the date of this filing, all necessary easements are in the process of being secured. Columbia may procure additional temporary easements for the purposes of temporary access and/or workspace as needed.

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

The Project will be tested such that it will have an MAOP of 650 pounds per square inch gauge ("psig"). Columbia will be installing 24-inch main-line

piping that is FBE coated steel with ARO overcoat, with a wall thickness of 0.375 inches. The Project will intersect Big Walnut Creek and private property, along with one county and one municipal right-of-way (Sunbury Rd. and Sunbury Road East, respectively). The Project is located within the City of Columbus, Franklin County, Ohio. OPSB rules will be followed regarding contacting landowners, officials and posting information for public access and review.

A list of affected property owners is included in **Attachment** E.

- (b) For electric power transmission lines that are within 100 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 as it does not relate to an electric power transmission line.

(c) The estimated capital cost of the project.

The estimated total cost of the proposed Project is \$

- (10) Social and Ecological Impacts of the Project.
  - (a) A brief, general description of land use within the vicinity of the proposed project, including a list of municipalities, townships, and counties affected.

The Project is located within the City of Columbus, Franklin County, Ohio. The current land use along the route is comprised of mostly residential properties. There is an approximately 1,465-foot-long section of the route that will be utilized for HDD, minimizing impacts to Big Walnut Creek and Sunbury Rd.

There are no new planned residential developments within the Project study corridor that were discovered as part of the survey. The Project is not expected to significantly impact existing or planned land use within the vicinity of the Project. There are no federal lands that will be crossed by the Project.

The municipalities, townships, and counties affected include Franklin County and the City of Columbus.

(b) 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 land or agricultural district land parcels are impacted by the Project.

(c) A description of the applicant's investigation concerning the presence or absence of significant archaeological 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.

Columbia coordinated with the State Historic Preservation Office (SHPO) for review of the Project area on August 22, 2025. SHPO is reviewing the project's area and impact and to date we have not received agency response. Please see **Attachment B** with the SHPO submittal. Agency correspondence will be forwarded to OPSB once received.

(d) A list of the local, state, and federal government 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.

A copy of this Construction Notification has been sent to the following public officials concurrently with its submittal to the Ohio Power Siting Board.

Franklin County		
Kevin L. Boyce Erica C. Crawley		
Franklin County Commissioner	Franklin County Commissioner	
373 S. High Street	373 S. High Street	
Columbus, Ohio 43215	Columbus, Ohio 43215	
John O'Grady	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 (Director)	Franklin County Engineer	
1404 Goodale Boulevard, Suite 100	970 Dublin Road	
Columbus, Ohio 43212	Columbus, Ohio 43215	

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		
Rob Dorans	Nicholas J. Bankston		
Columbus City Council President Pro Tem	Councilmember		
90 W. Broad Street	90 W. Broad Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		
Lourdes Barroso de Padilla	Nancy Day-Achauer		
Councilmember	Councilmember		
90 W. Broad Street	90 W. Broad Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		
Otto Beatty	Melissa Green		
Columbus City Council	Councilmember		
90 W. Broad Street	90 W. Broad Street		
Columbus, Ohio 43215	Columbus, Ohio 43215		
Emmanuel V. Remy	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	

In addition to submitting this Construction notification to the Ohio Power Siting Board, the Project is subject to the following federal, state, and local agency reviews and authorizations to be received prior to construction beginning:

- U.S. Army Corps of Engineers (USACE) Nationwide Permit 3 Evaluation;
- Ohio Environmental Protection Agency (OEPA) Section 402 National Pollutant Discharge Elimination System (NPDES) and Construction Stormwater Permit and Stormwater Pollution Prevention Plan (SWPPP) requirements;
- City of Columbus SWPPP review (CC Plan);
- Ohio EPA Hydrostatic Test Water Discharge Permit.

Below please find the consultations that Columbia is seeking, which may not be received prior to construction beginning:

- U.S. Fish & Wildlife Service (USFWS) Ohio Ecological Field Office Section
  7 Threatened and Endangered Species Consultation;
- Ohio State Historic Preservation Office Section 106 Historic Resources Consultation;
- Ohio Department of Natural Resources (ODNR) State Threatened and Endangered Species Consultation.
- (e) 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.

A threatened and endangered species review was conducted to become aware of the potential presence of Endangered or Threatened listed species that are located within the Project Study Area or within the vicinity. The United States Fish and Wildlife Service (USFWS) web page was reviewed to determine species that have Federal protection in Franklin County, within the state of Ohio. A refined search, using the USFWS Information for Planning and Consultation (IPaC) database, was performed to provide a more detailed list of species and critical habitat under USFWS jurisdiction that are known or expected to occur within the Project Study Area. The table below provides the USFWS IPaC Species List for the Project Study Area.

Table 1. USFWS IPaC Species List for Project Study Area			
Common Name	Common Name Scientific Name		
Insects			
Monarch Butterfly Danaus plexippus Proposed Threatened			
Mammals			
Indiana Bat	Myotis sodalis	Federally Endangered	
Northern Long-eared Bat	Myotis septentrionalis	Federally Endangered	
Clams			
Round Hickorynut	Obovaria subrotunda	Federally Threatened	
Rayed Bean	Villosa fabalis	Federally Endangered	
Salamander Mussel	Simpsonaias ambigua	Proposed Endangered	

In addition to the review of federal databases, a review was conducted of the Ohio Department of Natural Resources (ODNR) web page regarding natural heritage resources surrounding the Project Study Area. The ODNR provides results of potential occurrences of rare species, natural communities, and federally listed species that have been documented within the immediate vicinity of the Project Study Area. Table 2 lists species that, as of August 19, 2025, potentially occur in Franklin County.

Table 2. ODNR Franklin County Species List as of August 19, 2025			
Common Name	Scientific Name State Status Feder		Federal Status
Birds			
Green-winged Teal	Anas crecca	Special Interest	-
Sandhill Crane	Antigone canadensis	Threatened	-
Great Egret	Ardea alba	Species of Concern	-

Upland Sandpiper	Bartramia longicauda	Endangered	-
American Bittern	Botaurus lentiginosus	Endangered	-
Lark Sparrow	Chondestes grammacus	Endangered	-
Least Bittern	Ixobrychus exilis	Threatened	-
Yellow-crowned Night-heron	Nyctanassa violacea	Special Interest	-
Prothonotary Warbler	Protonotaria citrea	Species of Concern	-
Barn Owl	Tyto furcata	Threatened	-
Golden-winged Warbler	Vermivora chrysoptera	Special Interest	-
	Insects	·	
Lyre-tipped Spreadwing	Lestes unguiculatus	Species of Concern	-
Eastern Ringtail	Erpetogomphus designatus	Species of Concern	-
Stygian Shadowdragon	Neurocordulia yamaskanensis	Endangered	-
	Fish		
Lake Chubsucker	Erimyzon sucetta	Threatened	-
Muskellunge	Esox masquinongy	Species of Concern	-
Iowa Darter	Etheostoma exile	Endangered	-
Spotted Darter	Etheostoma maculatum	Endangered	-
Tippecanoe Darter	Etheostoma tippecanoe	Species of Concern	-
Shortnose Gar	Lepisosteus platostomus	Endangered	-
Blacknose Shiner	Notropis heterolepis	Endangered	_
Paddlefish	Polyodon spathula	Threatened	-
	Clams/Mollusk		
Elktoe	Alasmidonta marginata	Species of Concern	-
Slippershell Mussel	Alasmidonta viridis	Threatened	-
Purple Wartyback	Cyclonaias tuberculata	Species of Concern	-
Elephant-ear	Elliptio crassidens	Endangered	-
Northern Riffleshell	Epioblasma rangiana	Endangered	-
Snuffbox	Epioblasma triquetra	Endangered	Endangered
Wavy-rayed Lampmussel	Lampsilis fasciola	Species of Concern	-
Pocketbook	Lampsilis ovata	Endangered	-
Creek Heelsplitter	Lasmigona compressa	Species of Concern	-
Black Sandshell	Ligumia recta	Species of Concern	-
Washboard	Megalonaias nervosa	Endangered	-
Threehorn Wartyback	Obliquaria reflexa	Species of Concern	-
Round Hickorynut	Obovaria subrotunda	Threatened	-
Clubshell	Pleurobema clava	Endangered	Endangered
Round Pigtoe	Pleurobema sintoxia	Species of Concern	-
Kidneyshell	Ptychobranchus fasciolaris	Species of Concern	-
Salamander Mussel	Simpsonaias ambigua	Threatened	-
Rabbitsfoot	Theliderma cylindrica	Endangered	Threatened
Fawnsfoot	Truncilla donaciformis	Species of Concern	_

Deertoe	Truncilla truncata	Species of Concern	_
Pondhorn	Uniomerus tetralasmus	Threatened	-
Rayed Bean	Villosa fabalis	Endangered	Endangered
Rainbow	Villosa iris	Species of Concern	-
	Reptiles/Amphibians		
Smooth Greensnake	Opheodrys vernalis	Endangered	-
Queensnake	Regina septemvittata	Species of Concern	-
Blanchard's Cricket Frog	Acris blanchardi	Species of Concern	-
	Mammals		
Deer Mouse	Peromyscus maniculatus	Species of Concern	-
American Badger	Taxidea taxus	Species of Concern	-
Indiana Bat	Myotis sodalis	Endangered	Endangered
Little Brown Bat	Myotis lucifugus	Endangered	-
Northern Long-eared Bat	Myotis septentrionalis	Endangered	Endangered
Tricolored Bat	Perimyotis subflavus	Endangered	-
	Flowering Plants		
American Sweet-flag	Acorus americanus	Potentially Threatened	-
Gattinger's-foxglove	Agalinis gattingeri	Threatened	-
Spreading Rock Cress	Arabis patens	Endangered	-
Southern Hairy Rock Cress	Arabis pycnocarpa var. adpressipilis	Potentially Threatened	-
Prairie False Indigo	Baptisia lacteal	Potentially Threatened	-
Prairie Brome	Bromus kalmii	Potentially Threatened	-
Cypress-knee Sedge	Carex decomposita	Endangered	-
Tall Larkspur	Delphinium exaltatum	Potentially Threatened	-
Scaly Blazing-star	Liatris squarrosa	Potentially Threatened	-
Showy Goldenrod	Solidago speciosa	Threatened	-
Abor Vitae	Thuja occidentalis	Potentially Threatened	-
Three-birds Orchid	Triphora trianthophora	Potentially Threatened	-
Rock Elm	Ulmus thomasii	Potentially Threatened	-

A project review request letter was submitted to both ODNR and USFWS on August 20, 2025, seeking review of the potential impacts of the Project on federal and state listed species and their habitats within the Project area. An email correspondence was received from USFWS indicating no objections to tree cutting prior to October 1. While a response from ODNR is still pending as of this submittal date, please refer to the mailed correspondence in **Attachment C**.

Additionally, a mussel survey has been conducted in the Big Walnut Creek portion within Project area. Based on the results indicating no threatened or endangered species were present within the survey or salvage areas, the corresponding USFWS biologist found no objection to completing the repair. Please see **Attachment C** for the email correspondence.

(f) 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. According to the USFWS, there are no federal wilderness areas, wildlife refuges, or designated critical habitat within the vicinity of the Project area. Streams identified in the Project area are not part of a National or State wild and scenic river. For the full Wetland Delineation Report, please see **Attachment D**. Excerpts of **Attachment D** are below:

The Project consists of the installation of approximately 1,465 linear feet of steel 24-inch diameter pipeline via horizontal direction drill (HDD) under Big Walnut Creek to remediate pipeline integrity concerns.

Available background information was reviewed for the Project prior to conducting a site visit. This available background information included the 2023 U.S. Geological Survey (USGS) 7.5 minute topographic maps (Northeast Columbus, Ohio quadrangles), U.S. Fish & Wildlife Service (USFWS) National Wetlands Inventory (NWI) maps, National Agriculture Imagery Program (NAIP) aerial photography (2022), USGS National Hydrography Dataset (NHD), Federal Emergency Management Agency (FEMA) National Flood Hazard Layer (NHFL), and U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) 2019 Soil Survey Geographic (SSURGO) digital data for Franklin County, Ohio. Figures 2 and 3 in Appendix A of Attachment D depict this data.

A wetland scientist completed a wetland delineation of the Survey Area on July 30th, and August 19th, 2025. The Survey Area included the areas where proposed Project activities would occur. The delineation was completed in accordance with the 1987 Corps of Engineers Wetlands Delineation Manual

(1987 Manual) and the 2010 Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Midwest Region – Version 2.0 (Regional Supplement).

USFWS NWI data shows one riverine wetland which is associated with the USGS NHD stream that crosses the Survey Area. The stream is named Big Walnut Creek and has mapped FEMA 100-year floodplain, 500-year floodplain, and Floodways associated with the stream and are present in the Survey Area (Appendix A of Attachment D, Figure 3). Aerial imagery indicates the Survey Area consists of road right of way, residential areas with some maintained grass, and forest (Appendix A of Attachment D, Figures 3 and 4).

S02, or Big Walnut Creek, is a relatively permanent perennial stream (Appendix C of Attachment D, Photographs 1 and 2). A total of 218 feet of S02 was delineated within the Survey Area. S02 was approximately 120.0 feet wide, had a bank height of 6.0 feet, and a depth to OHWM of 4.0 feet. It achieved a QHEI score of 79.5. Using professional judgement, S02 flows offsite to the south into the Scioto River and should be considered jurisdictional and a WOTUS.

S03 is an unnamed relatively permanent perennial stream (Appendix C of Attachment D, Photographs 3 and 4). A total of 309 feet of S03 was delineated within the Survey Area. S03 was approximately 5.0 feet wide, had a bank height of 2.0 feet, and a depth to OHWM of 0.5 feet. It achieved a HHEI score of 60. Using professional judgement, S03 flows offsite to the east into Big Walnut Creek and should be considered jurisdictional and a WOTUS.

The USFWS IPaC report and the ODNR County lists (Appendix E of Attachment D) were researched for federal and state protected species present within and near the Survey Area. Project initial review request letters were also sent to the USFWS and ODNR in August 2025. No response has been received to date from these Agencies.

Typical vegetation within this upland maintained habitat consists of Kentucky bluegrass (*Poa pratensis*). The forested habitat consisted of mostly honeysuckle (*Lonicera maacki*i), black walnut (*Juglans nigra*), eastern cottonwood (*Populus deltoides*), and goldenrod (*Solidago canadensis*).

(g) 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