

290 W. Nationwide Blvd.
Columbus, Ohio 43215
Direct: 614.315.3391
mlthompson@nisource.com



April 16, 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 the West-Central
NCHP Pipeline Project*
OPSB Case No. 25-0345-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 minor modification ("Adjustment") in one area of a proposed pipeline relocation that was previously approved by the Ohio Power Siting Board ("OPSB") known as the West-Central NCHP Pipeline Project (the "Project") in Case No. 24-0667-GA-BLN.

Columbia also requests, pursuant to Adm.Code 4906-6-03(B) and 4906-6-04, 21-day 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 meet the requirements that the City of Columbus' Department of Utilities has in place.

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 24-0667-GA-BLN, the OPSB approved Columbia's Letter of Notification to

construct the Project. The Project is generally located in the City of Columbus and the City of Upper Arlington. The Project, once completed, will be approximately 12,780 feet (2.4 miles) in length and consist of construction of 463 feet of 12-inch diameter, 70 feet of 16-inch diameter, and 12,247 feet of 20-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 minor shift in alignment 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	69+70 to 73+20	Pipeline Shift is approximately 19' South for 350'.	L-1021 & L-1022	To maintain adequate horizontal clearance from the City of Columbus owned traffic infrastructures.

- **Adjustment:** The Adjustment is shifting the pipeline to maintain adequate clearance between Columbia's proposed pipeline and City of Columbus existing utility infrastructure within The Ohio State University property. This will result in an approximate alignment shift of 19 feet south for 350 feet. The shift will take place at the intersection of Fred Taylor Dr and Ackerman Rd in Columbus, Ohio (N 40.01819° W -83.02935°). The shift is necessary to ensure that adequate horizontal clearance is maintained between Columbia's pipeline and the City of Columbus's existing traffic infrastructure to meet the City of Columbus's standards.

The area highlighted on **Attachments A and B**, called out as "Adjustment," is the impacted area that has 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 is necessary to ensure that adequate horizontal clearance is maintained between Columbia's pipeline and the City of Columbus's existing traffic infrastructure in The Ohio State University property to meet the City of Columbus's standards.

(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 yellow 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.

While Columbia and The Ohio State University (upon who's land the Adjustment is contained) discussed the proposed alignment, when proposed as a viable design within Case No. 24-0667-GA_BLN, the City of Columbus determined that Columbia would not permitted to install its pipeline as previously approved by the OPSB. 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. 24-0667-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 proposed pipeline near and across The Ohio State University property to begin around April 2025 and to complete this work by December 31, 2025. Columbia expects construction to begin near and around Upper Arlington in the spring of 2026 and to complete this work by December 31, 2026.

The portion of the greater “West Central” Project detailed within the Adjustment is included in the section to be placed in-service on or about December 31, 2025.

(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 shows the Adjustment, which 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 Adjustment 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. Moreover, the Adjustment is limited to the previously secured workspaces within property owned by The Ohio State University.

(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 it will have an MAOP of 190 pounds per square inch gauge (PSIG). Columbia will be installing 20-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; however, the Adjustment is limited to the previously secured workspaces within property owned by The Ohio State University. 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 commercial 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 this 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 Upper Arlington	
Ukeme Awakessien Jeter	Heidi Munc
City of Upper Arlington Council President / Mayor	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Brian C. Close	John J Kulewicz
City of Upper Arlington Council Vice President	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221

614-583-5040	614-583-5040
Kathy Adams	Jim Lynch
City of Upper Arlington Council	City of Upper Arlington Council
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
Todd Walter	Krystal Gonchar
City of Upper Arlington Council	City of Upper Arlington City Clerk
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5040	614-583-5040
August Polen	Steven Schoeny
City of Upper Arlington Deputy Clerk of Courts	City of Upper Arlington City Manager
3600 Tremont Rd	3600 Tremont Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5060	614-583-5040
Chad Gibson	Aaron Scott
City of Upper Arlington Community Development	City of Upper Arlington Engineering Division
3600 Tremont Rd	4100 Roberts Rd
Upper Arlington, OH 43221	Upper Arlington, OH 43221
614-583-5074	614-583-5351

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
614-645-7671	614-645-7671

Rob Dorans	Nicholas J. Bankston
City of Columbus, Council President	Columbus City Council
Pro Tempore	90 W. Broad Street
90 W. Broad Street	Columbus, Ohio 43215
Columbus, Ohio 43215	614-645-7671
Lourdes Barroso de Padilla	Nancy Day-Achauer
Columbus City Council	Columbus City Council
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-645-7671	614-645-7671
Shayla Favor	Melissa Green
Columbus City Council	Columbus City Council
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-645-7671	614-645-7671
Emmanuel V. Remy	Christopher L. Wyche
Columbus City Council	Columbus City Council
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-645-7671	614-645-7671
Andrea Blevins	Toya Johnson
City of Columbus City Clerk	City of Columbus Deputy City Clerk
90 W. Broad Street	90 W. Broad Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-645-7671	614-645-7671

Franklin County	
Kevin L. Boyce	Erica C. Crawley
Franklin County Commissioner	Franklin County Commissioner
President	373 S. High Street
373 S. High Street	Columbus, Ohio 43215
Columbus, Ohio 43215	614-525-3600
614-525-3600	

John O'Grady	Maryellen O'Shaughnessy
Franklin County Commissioner	Clerk of Courts
373 S. High Street	373 S. High Street
Columbus, Ohio 43215	Columbus, Ohio 43215
614-525-3600	614-525-3600
Brad Foster, P.E., P.S.	
Franklin County Engineer	
970 Dublin Road	
Columbus, Ohio 43215	
614-525-3600	

Clinton Township	
Jessica Jessberger	Rebecca Grimm
Clinton Township Trustee	Clinton Township Trustee
3820 Cleveland Avenue	3820 Cleveland Avenue
Columbus, Ohio 43224	Columbus, Ohio 43224
614-257-7433	614-361-2732
David Clark	
Clinton Township Trustee	
3820 Cleveland Avenue	
Columbus, Ohio 43224	
614-499-8803	

Perry Township	
Chet J. Chaney	Andy English
Perry Township Trustee	Perry Township Trustee
7125 Sawmill Road	7125 Sawmill Road
Dublin, OH 43016	Dublin, OH 43016
614-889-2669	614-889-2669
James Roper	
Perry Township Trustee	
7125 Sawmill Road	
Dublin, OH 43016	
614-889-2669	

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 construction beginning:

- 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 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 for the slight alignment modification. 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