



February 7, 2025

Debbie-Anne A. Reese, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington DC 20426

**Re: Request for Pre-filing Review
Gulf South Pipeline Company, LLC
Texas Gas Transmission, LLC
Kosciusko Junction Pipeline Project
Docket No. PF25-____-000**

Dear Ms. Reese:

Boardwalk Pipelines, LP (“Boardwalk”) subsidiaries, Gulf South Pipeline Company, LLC (“Gulf South”) and Texas Gas Transmission, LLC (“Texas Gas”) (collectively referred to herein as “Applicants”) submit this joint request to the Federal Energy Regulatory Commission (“Commission”) Staff to initiate a pre-filing review of the Applicant’s proposed Kosciusko Junction Pipeline Project (“Project”), pursuant to 18 C.F.R Section 157.21 of the Commission’s regulations.

As part of this Project, Texas Gas and Gulf South are proposing the following:

Texas Gas Facilities

Texas Gas is proposing to (i) expand its existing Greenville Compressor Station by constructing a new unit, and (ii) abandon by sale to Gulf South its Greenville Lateral and existing Isola Compressor Station, as further described below.

Gulf South Facilities

Gulf South is proposing to (i) acquire Texas Gas’s existing Greenville Lateral and existing Isola Compressor Station, (ii) constructing two new pipelines totaling approximately 110 miles of 36-inch-diameter pipe, (iii) construct five new compressor units at two new and one existing stations, and new receipt and delivery meters at three locations, as further described below.

Proposed Lease

Gulf South is proposing to acquire, from Texas Gas, through a lease, transportation capacity on the Texas Gas mainline system.

The proposed Project, as approved by the Boardwalk Board of Directors based upon signed precedent agreements for a majority of the capacity, will create 1.16 billion cubic feet per day (“Bcf/d”) of firm transportation capacity that, with additional market support, could be increased to 1.58 Bcf/d.

The Applicants request the Commission Staff initiate pre-filing review of the Project and facilities required for the 1.16 Bcf/d Project. The pre-filing process by its nature allows the Applicants and the Commission to begin working on a project while additional contractual commitments for capacity are sought. The Applicants will continue to negotiate with prospective customers from the open season and other customers who have expressed an interest in joining the project. The Project will have the same footprint regardless of whether the 1.58 Bcf/d or 1.16 Bcf/d project size is ultimately selected, as the only difference between the two project sizes is the number and size of compressor units.

This Project will create an effective operational loop of Gulf South’s existing 42-inch-diameter pipeline to provide firm transportation of new gas supplies from the Midcontinent, Marcellus, and Fayetteville basins to Gulf South’s delivery markets, which are experiencing significant electric power generation growth. The Project’s operational loop will increase firm transportation capacity, enhance system reliability, and add operational flexibility to allow Gulf South to deliver new gas supplies that were previously not directly connected to Gulf South’s system to the critical Southeast energy corridor. The Project’s infrastructure enhancements will remove bottlenecks and increase the supply diversity available to Gulf South’s customers to help meet the region’s growing energy needs in an efficient, reliable and environmentally responsible manner.

To support this request, the Applicants submit the following information in accordance with section 18 C.F.R 157.21(d) of the Commission’s regulations:

(1) A description of the schedule desired for the Project including the expected application filing date and the desired date for Commission approval.

Applicants request approval to commence the pre-filing process on or before February 21, 2025, and plan to file the certificate application by Gulf South and corresponding abandonment application by Texas Gas on or before September 19, 2025 – more than 180 days after the date of the requested Director of the Office of Energy Project’s Notice approving the use of the pre-filing process for this Project (“Director’s Notice”).

Applicants will coordinate with Commission Staff to prepare Resource Reports in order to develop a complete Environmental Report for the Project. Applicants will coordinate preparation of and submit a draft set of Resource Reports to the Commission for review and comments as early as June 2025. Applicants will work with Commission Staff to secure the necessary permits and authorizations that will allow them to meet the planned in-service date of April 1, 2029.

Applicants proposed timeline for Project is as follows:

February 2025	Accepted into the Pre-filing Process
March 2025	Submit Draft Resource Report 1 and Summary of Resource Report 10
April 2025	Conduct Open Houses
June 2025	Submit Draft Resource Reports 1 – 12
September 2025	Submit Section 7 Application
April 2027	Requested Date for FERC Issuance of a Certificate/Abandonment Order
Q1 2028	Anticipated Construction Start
April 1, 2029	Target In-Service Date

Applicants are seeking to use the pre-filing process to develop and obtain timely processing of the certificate/abandonment application. During the pre-filing process Applicants will conduct significant additional outreach efforts to seek stakeholder input; conduct civil engineering and field surveys for cultural resources, wetlands, and endangered species to identify and address routing issues; and submit final permits to Federal, state, and local regulatory agencies. Applicants anticipate resolving any material issues raised during the outreach and scoping processes and submitting a complete application to the Commission by September 2025.

Pursuant to Section 157.21(f)(4) and (5) of the Commission’s regulations, 18 CFR § 157.21(f)(4) and (5) (2024), Applicants will file drafts of Resource Report 1, General Project Description and a summary of Resource Report 10, Alternatives considered or under consideration for the Project, as well as the stakeholder mailing list, within thirty days of the issuance of the Director’s Notice.

Applicants will comply with the timelines established by Commission Staff and provide Commission Staff the information as set forth in Section 157.21(f) of the Commission’s regulations.

(2) For LNG terminal facilities, a description of the zoning and availability of the proposed site and marine facility location.

Not applicable to this Project.

(3) For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, an explanation of why the prospective applicant is requesting to use the pre-filing process.

Applicants seek to use of the pre-filing process to engage federal, state, and local agencies and all stakeholders during the development phase of the Project and to identify and resolve issues at the earliest stages of project development to aid Applicants in meeting the planned in-service date. The pre-filing process provides Applicants and interested stakeholders the opportunity to discuss and address routing, siting, and other environmental issues with Commission Staff prior to developing and filing the certificate application. It also allows the Project scoping and environmental review processes to proceed concurrently with the final design and route selection

for the Project. Involving agencies, landowners and other stakeholders early in the process results in a more effective and efficient certificate application and subsequent regulatory review. The pre-filing process will be beneficial in the following ways:

- Facilitating issue identification, study needs, and issue resolution;
- Conducting site visits, examining alternatives, meeting with agencies and stakeholders, and participating in open houses;
- Issuing a scoping notice and conducting scoping for the Project; and
- Assisting in the development of and review of the Resource Reports to ensure a complete certificate filing.

(4) A detailed description of the Project, including location maps and plot plans to scale showing all major plant components that will serve as the initial discussion point for stakeholder review.

Open Season / Contractual Commitments

Applicants plan to construct the Project to serve customers and expand and modify existing mainline facilities in western Mississippi. The Project will enable Applicants to serve an anchor customer with whom Gulf South has entered into 20-year firm precedent agreement to transport natural gas to help meet the substantial growth in power generation markets. Gulf South held an open season for the Project which closed on November 12, 2024. Gulf South is in current negotiations with other potential customers to contract the remaining Project capacity which could be as large as 1.58 Bcf/d. Based on the binding precedent agreement executed, Applicants are committed to beginning the pre-filing review. The facilities described below are required to provide 1.16 Bcf/d of Project capacity, but with additional compression, Project capacity could be increased to 1.58 Bcf/d if needed to meet market demand.

PROJECT COMPONENTS

Use of the Existing Facilities

Expanding Texas Gas' Greenville Station

Texas Gas is proposing to seek certificate authorization to construct a new compressor unit at its existing Greenville Compressor Station. Texas Gas will continue to own and operate the Greenville Station as it will both provide mainline compression for existing and lease capacity and to support deliveries onto the Greenville Lateral.

Acquisition of the Greenville Lateral from Texas Gas

Gulf South is proposing to acquire by sale Texas Gas' existing Greenville Lateral, which is comprised of approximately 98 miles of 36-inch-diameter pipeline, the Isola Compressor Station with compressors currently rated at 13,330 horsepower ("HP"), and additional auxiliary facilities. The Isola Station is the only station on the lateral today. Texas Gas will propose to abandon the Greenville Lateral and Isola Compressor Station to Gulf South by sale.

Expanding the Greenville Lateral

Gulf South proposes to expand the capacity of the Greenville Lateral by adding one new unit at the existing Isola Compressor Station and adding one unit at a new greenfield compressor station in Holmes County, Mississippi – the Holmes Compressor Station.

In total, the Applicants propose to expand the existing system by adding three new compressor units (approximately 61,000 HP in total) including modifications at existing compressor stations and a new station along the existing Greenville Lateral in southeast Mississippi. The new compressor units and modifications will be located at the following:

Texas Gas

Existing Greenville Compressor Station – one new approx. 23,000 HP natural gas unit – Washington County, Mississippi

Gulf South

Existing Isola Compressor Station – one new approx. 15,000 HP natural gas unit – Humphrey County, Mississippi

New Holmes Compressor Station – one new approx. 23,000 HP natural gas unit – Holmes County, Mississippi

Columbia Gulf Lateral and Interconnect

Gulf South is proposing to construct as part of the Project the Columbia Gulf Lateral and interconnect (“Columbia Lateral”), which will consist of approximately 8 miles of 36-inch-diameter pipeline located in Humphreys and Sunflower Counties, Mississippi, and will be co-located with the rights-of-way of other existing pipelines and powerlines for approximately 66% of the proposed route. The final route is still being evaluated. A map of the Columbia Lateral is provided in **Exhibit A** to this request. The proposed Columbia Lateral will tie-in to the Greenville Lateral at the Isola Compressor Station and connect to a new Receipt Meter and Regulator (“M&R”) Station location with Columbia Gulf in Humphreys County, Mississippi.

The New Kosciusko Junction Pipeline and Compressor Station

Kosciusko Junction Pipeline

The Kosciusko Junction Pipeline (“Kosciusko Pipeline”) portion of the Project will consist of Gulf South constructing approximately 102 miles of 36-inch-diameter pipeline located in central Mississippi and will be co-located with the rights-of-way of existing pipelines and powerlines for approximately 56% of the proposed route. The final route is still being evaluated by Gulf South. A map of the Kosciusko Pipeline is provided in **Exhibit A** to this request.

The proposed Kosciusko Pipeline will commence at the terminus of the Greenville Lateral in Attala County, Mississippi and terminate in Clarke County, Mississippi at Gulf South’s existing

Destin Compressor Station. The Kosciusko Pipeline will have two interconnects as detailed below.¹

The new Kosciusko Compressor Station

The Project will include the new Kosciusko Compressor Station with three natural gas compressor units totaling approximately 58,000 HP, to be sited on property owned by Gulf South in Attala County, Mississippi, to be located near the beginning of the Kosciusko Junction Pipeline.

Interconnects

Gulf South is proposing to construct a Delivery M&R Station with Southern Natural Gas Company that will be located on the new Kosciusko Junction Pipeline in Clarke County Mississippi. Gulf South will also install a Receipt M&R Station with Texas Eastern Transmission Corporation that will be located within the Kosciusko Compressor Station in Attala County, Mississippi.

Proposed Lease

Lease between Texas Gas and Gulf South

Gulf South is proposing to acquire from Texas Gas, through a lease, transportation capacity on the Texas Gas mainline system from certain receipt points to the Greenville Lateral. The proposed lease will allow Gulf South to access critical new natural gas supplies using capacity the Project creates to serve its customers. Texas Gas will propose to abandon the leased capacity to Gulf South.

A map of the proposed pipelines and compressor station locations is provided in **Exhibit A** to this request.

- (5) A list of the relevant federal and state agencies in the Project area with permitting requirements. For LNG terminal facilities, the list shall identify the agency designated by the governor of the state in which the Project will be located to consult with the Commission regarding state and local safety considerations.**

A list of the relevant federal and state agencies in the Project area with permitting requirements for the Project is provided with this letter as **Exhibit B**. Applicants have conducted initial phone conversations, and email correspondences with the various federal and state agencies across the Project area and introduced the Project and the pre-filing process. Applicant's representatives discussed the proposed Project scope, locations, and the various Project components. Applicants invited each agency to participate in the pre-filing process, provided contact information for their personnel, and requested meetings with the agencies to further discuss the Project and the applicable procedures and schedules. Applicants discussed information regarding field work efforts and expectations, permitting requirements and expectations, and preliminary timelines for such work.

¹ Texas Gas is proposing to construct under its blanket certificate authorization in Docket No. CP82-407-000, receipt points with ANR Pipeline Company and Tennessee Gas Pipeline Company, LLC on its existing mainline system.

Exhibit B includes the agency name, permitting or authority, and estimated permitting timeline for each respective environmental agency. (Specific contact information for each stakeholder has been included in **Exhibit C**.) **Exhibit B** also provides similar information for Native American Tribes potentially affected by the Project. Applicants expect to file applications for all necessary federal permits concurrent with the filing of the certificate application.

Include a statement indicating:

(i) that those agencies are aware of the prospective applicant’s intention to use the pre-filing process (including contact names and telephone numbers);

Exhibit B contains all environmental resource agencies with known jurisdiction over the Project. During the week of January 13, 2025, the Applicants commenced notifying these agencies of the Project and Applicant’s intent to utilize the pre-filing process.

(ii) whether the agencies have agreed to participate in the process;

The following environmental resource agencies expressed interest in participating in the pre-filing process.

- MS Department of Archives and History
- U.S. Army Corps of Engineers – Mobile District
- U.S. Army Corps of Engineers – Vicksburg District
- U.S. Environmental Protection Agency – Region 4
- U.S. Fish and Wildlife Service – Mississippi Ecological Field Office

(iii) how the applicant has accounted for agency schedules for issuance of federal authorizations; and

Exhibit B contains both the anticipated submittal dates and anticipated receipt dates for these authorizations. These dates not only fit the anticipated timeline for the National Environmental Policy Act (“NEPA”) review, but also permit Applicants to meet the proposed construction and in service schedules.

(iv) when the applicant proposes to file with these agencies for their respective permits or other authorizations.

Applicants anticipate filing for pre-construction permits concurrently with or shortly after filing the Application for a Certificate of Public Convenience and Necessity and corresponding abandonment authority with the Commission. Certain state construction permits will be submitted closer to construction. Please refer to **Exhibit B** for these permits and dates.

(6) A list and description of the interest of other persons and organizations who have been contacted about the Project (including contact names and telephone numbers).

A list of stakeholders and other persons and organizations that have or will be contacted, via email or in-person meetings, about the project is attached as **Exhibit C**. In December 2024 and January 2025, Applicants notified stakeholders of the Project, including local, municipal, state and Federal elected officials. Applicants specifically contacted the Governor's office, the Mississippi Development Authority, Mississippi Senators, and key U.S. Representatives to provide them information about the Project. Applicants met with the applicable Mississippi State Representatives and Senators in December/January.

Within fourteen days of the Director's Notice, Applicants will contact all stakeholders not already informed about the Project, including any affected landowners (as that term is defined by 18 CFR §157.6(d)(2)).

(7) A description of what work has already been done, e.g., contacting stakeholders, agency consultations, Project engineering, route planning, environmental and engineering contractor engagement, environmental surveys/studies, and open houses. This description shall also include the identification of the environmental and engineering firms and sub-contractors under contract to develop the Project.

Initial Review

Applicants initiated development of the Project in summer 2024 based upon an inquiry from potential Project customers. After this initial evaluation, Applicants' engineering and environmental staff began technical, economic, and environmental feasibilities by developing a preliminary corridor for the pipeline utilizing other energy corridors to provide significant co-location opportunities.

Public Outreach and Open Houses

Applicants retained Balch & Bingham LLP to assist in their outreach efforts and Insignia Environmental, through Troy Construction LLC ("Troy").² Within seven days of the Director's Notice, Applicants, after consultation with Commission Staff, will establish dates and locations for virtual and hosted open houses regarding the proposed expanded and new compression and pipeline. Applicants are proposing to host the open houses as early as April 2025.

Engineering and Land

Gulf South contracted Troy to assist with the feasibility / planning and design / engineering for the Project. In September 2024, Gulf South and Troy did a flyover and performed aerial reconnaissance of the proposed pipeline route. Troy has evaluated geographical and environmental factors relevant to the establishment of the proposed route. Troy will be responsible for various surveys, studies, and drawings needed to support the filing of permits clearances, or other authorizations. Troy and Applicants construction personnel will evaluate the proposed route for constructability, crossings and horizontal directional drill locations. Applicants route

² Boardwalk and Troy have formed an alliance in which Troy will be manage engineering, land, environmental, and outreach services for Boardwalk's Project.

refinements are underway. In conjunction with Troy, Perennial Environmental Services, LLC, (“Perennial”) is currently verifying the preliminary research and desk-top analyses for these route refinements. Within thirty days of the Director’s Notice, Applicants will submit a stakeholder mailing list to Commission Staff.

Gulf South contracted with AB Land Services and Norfleet Land Services, through Troy, to provide land support (including determining legal title and refining the database of aerial photography), and civil surveys required for this Project.

Preliminary Route Selection / Environmental Review

Perennial has been contracted to complete all biological and cultural surveys in support of the pre-filing process, state and Federal permit acquisition, the environmental resource report preparation and the certificate application.

Perennial has conducted preliminary research, performed an environmental fatal flaw analysis and conducted desk-top analyses of the preliminary corridor based on available natural resource information. In October 2024, Perennial evaluated the proposed route for threatened & endangered species and their habitat, environmental justice communities, cultural resources (via record review), tribal lands, and wetlands and waterbodies crossings and mitigation availability. The desk-top reviews were conducted by utilizing publicly available information from several GIS databases, information from recent co-located projects, and resources provided by Troy. Applicants then contacted the various federal and state agencies across the Project.

Civil and Environmental Surveys

Applicants obtained the names and addresses of landowners along the corridor from the local tax rolls and has commenced seeking survey permission. Applicants commenced civil and environmental field work February 2025. Civil surveys will validate the preliminary corridor or provide corridor alternatives, identify a proposed route for the pipeline within those corridors, and identify any additional route variations and identify Project impacts. Environmental surveys provide collection of environmental data in support of any permit, clearance, or other authorization. Applicants anticipate concluding these surveys in third quarter 2025.

- (8) For LNG terminal Projects, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document.**

Not applicable to this Project.

- (9) For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA document, or a proposal for the submission of an applicant-prepared draft Environmental Assessment as determined during the initial consultation.**

Applicants issued a Requests for Proposal (“RFP”) to several third-party contractors to assist in the preparation of the requisite NEPA documents on January 8, 2025. The RFP required that the proposals be returned to Applicants on January 22, 2025. The Applicants extended the timeline to submit Bids until January 29, 2025 to allow additional time for contractors to submit their bids. Six contractors provided a proposal. Concurrently herewith, Applicants are providing copies of these proposals. Within fourteen days of the Director’s Notice, Applicants will execute the contract with the selected third-party contractor.

- (10) Acknowledgement that a complete Environmental Report and complete application are required at the time of filing.**

Applicants acknowledge that a complete Environmental Report and complete application are required at the time of filing. Applicants anticipate submitting the Environmental Report and complete application on or about September 19, 2025.

- (11) A description of a Public Participation Plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including a Project website and a single point of contact. This plan shall also describe how the applicant intends to respond to requests for information from federal and state permitting agencies, including, if applicable, the governor’s designated agency for consultation regarding state and local safety considerations with respect to LNG facilities.**

The Applicants have developed a project-specific Stakeholder Outreach and Public Participation Program (“Program”), submitted herewith as **Exhibit D**, to engage stakeholders during the pre-filing process. This Program emphasizes two-way communication to build trust, educate stakeholders, and foster transparency while addressing concerns and suggestions. The Applicants aim to inform communities about the Project’s purpose, benefits, and timeline through various tools, including hotlines, websites, direct mail, and media and single points of contact. The Applicants’ Program goals are to establish open dialogue, generate awareness of the Project’s importance to the regional economy, and maintain strong, ongoing relationships with stakeholders. The Applicants are committed to engaging with stakeholders and landowners to address concerns and will communicate major Project developments through direct mail or posted on the Project specific website.

- (12) Certification that a Letter of Intent and a Preliminary WSA have been submitted to the U. S. Coast Guard or, for modifications to an existing or approved LNG terminal, that the U. S. Coast Guard did not require such information.**

Not applicable to this Project.

For the reasons stated above, Applicants requests that the Commission Staff initiate a pre-filing review of the proposed Project. Should you have any questions you can reach the undersigned at 713.479.8059 or by email at mike.mcmahon@bwpipelines.com.

Sincerely,

GULF SOUTH PIPELINE COMPANY, LLC
TEXAS GAS TRANSMISSION, LLC



Michael E. McMahon

Senior Vice President and General Counsel

Exhibits

A: Project Location Maps

B: Potential Federal, State and Native American Contacts / Environmental Permits and Consultations Required

C: Stakeholder List

D: Public Participation Plan

cc: Pamela Boudreau (FERC)
David Swearingen (FERC)
Shannon Jones (FERC)
Gertrude Fernandez Johnson (FERC)