



DONALD F. SANTA
PRESIDENT & CEO

October 28, 2014

Mr. Bruce Carlson
Senior Policy Advisor, Planning and Policy Directorate
U.S. Army Corps of Engineers
441 G Street, NW
Washington, DC 20314

Re: Water Resources Reform and Development Act of 2014
Section 1006 – Expediting the Evaluation and Processing of Permits

Dear Mr. Carlson:

The Interstate Natural Gas Association of America (INGAA) supports the proposal by the U.S. Army Corps of Engineers (Corps) to accept and expend funds from natural gas pipeline operators to expedite the evaluation of permit applications under section 1006 of the Water Resources Reform and Development Act of 2014 (WRDA).

INGAA represents 26 interstate natural gas transmission pipeline operators in the United States and Canada. The pipelines operated by the INGAA membership are analogous to the interstate highway system, moving natural gas across the continent via high-capacity pipelines. As the production of natural gas has grown to unprecedented levels in the U.S. over the last decade, so has the need for new pipeline infrastructure to connect natural gas supplies to growing domestic markets.

In March of this year, the INGAA Foundation published a report estimating that approximately \$313 billion of natural gas infrastructure would need to be put in place in the 22-year period 2014-2035 to keep pace with demand. On average, approximately \$14.2 billion in investment will be needed each year.

This energy infrastructure development already is putting a strain on the many permitting agencies involved in approving natural gas pipelines, and the Corps is no exception. Section 1006 of the WRDA authorizes the Corps to accept and expend funds from natural gas pipeline operators to expedite the evaluation of permit applications. This authority is intended to provide a means for ensuring that applications for permits are reviewed in a timely and compliant manner, without further straining the limited resources of the Corps.

The timely review of permits for natural gas infrastructure will be critical if the nation, and American consumers, are to reap the benefits of this historic growth in our nation's energy supply. We encourage the Corps to adopt the rules and procedures needed to implement section 1006 as soon as possible. INGAA would be happy to work with you towards this end.

Thank you for the opportunity to share our views.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. F. Santa". The signature is stylized with a large, sweeping flourish at the end.

Donald F. Santa
President