

# TOWN OF BETHLEHEM



2155 Main Street • Post Office Box 189 • Bethlehem, New Hampshire 03574  
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August 8, 2016

Darlene Forst, NH DES Shoreland Program ([darlene.forst@des.nh.gov](mailto:darlene.forst@des.nh.gov))  
Philip Beaulieu, NH DOT ([pbeaulieu@dot.state.nh.us](mailto:pbeaulieu@dot.state.nh.us))

Re: Shoreland Impact Permit 2016-01302  
SEC Docket No.

Dear Ms. Forst and Mr. Beaulieu:

We are very concerned about possible environmental issues associated with geotechnical borings being conducted for the Northern Pass Transmission project.

And we are asking NH DES and DOT to stop the boring until it investigates the issues raised by Kris Pastoriza in Easton in the 11-page attachment. Our Conservation Commission was made aware of this issue this morning (August 8, 2016) and brought it to our attention.

Geotechnical boring was approved by DES to take place at Miller/Baker Brook Pond in Bethlehem "on or in the shoulder of Route 302 near Baker Brook Pond (also known as Miller Pond)," per DES's letter of August 4, 2016.

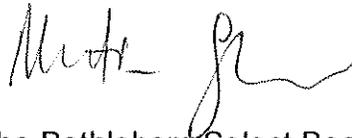
We don't know what materials or chemicals are being used in the boring project. If Best Management Practices are not being followed, there is the potential to contaminate the pond. Being over 10 acres, it is classified as Public Waters subject to the Comprehensive Shoreland Protection Program.

And Baker Brook flows out of Miller/Baker Brook Pond and into the Ammonoosuc River, which, as you certainly know, has been designated into the NH Rivers Management and Protection Program. There are also a number of stratified-drift aquifers that could be impacted.

We ask you to put a stop to work being done, investigate the matter, and to please inform us of your findings before you allow any work to be done in Bethlehem.

We appreciate your immediate attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to be 'Mike J.', written in a cursive style.

The Bethlehem Select Board

cc:

Ammonoosuc Local Advisory Committee ([cmcdade@roadrunner.com](mailto:cmcdade@roadrunner.com))

Thomas Burack ([Thomas.Burack@des.nh.gov](mailto:Thomas.Burack@des.nh.gov))

Craig Rennie ([craig.rennie@des.nh.gov](mailto:craig.rennie@des.nh.gov))

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Bethlehem Conservation Commission ([cherylkjensen@aol.com](mailto:cherylkjensen@aol.com))

([lmoore4055@gmail.com](mailto:lmoore4055@gmail.com))

Bethlehem Planning Board ([planning@bethlehemnh.org](mailto:planning@bethlehemnh.org))

Once again the Northern Pass Transmission SEC “process” needs to be placed on hold.

#1. NPT is not following Best Management Practices and is dumping toxic boring waste in WMNF and on the edge of roadways abutting private lands, to flow with the rain into the soil and watersheds.



## 6. ACCIDENTAL RELEASE MEASURES

Information in this section is for responding to spills, leaks or releases in order to prevent or minimize the adverse effects on persons, property and the environment. There may be specific reporting requirements associated with spills, leaks or releases, which change from region to region.

Containment and Clean-Up Procedures:

In all cases of leak or spill contact vendor at Emergency Number shown on the front page of this MSDS. Minimize air borne spreading of dust. Wear respirator, protective clothing and gloves. Avoid dry sweeping. Do not use compressed air to clean surfaces. Vacuuming or wet sweeping is preferred. Return all material possible to container for proper disposal. Do not allow to enter sewers or watercourses. Collect product for recovery or disposal. Ventilate enclosed spaces. Notify applicable government authority if release is reportable or could adversely affect the environment.

N

<http://www.psh.ca/MSDS/Bentonite%20Volclay%20&%20HPM-20.pdf>

#2. NPT does not have adequate emergency procedures in place for spills of bentonite and other chemicals in the drilling slurry. If the blue drum or black tubs (photos above and below) tip over, what possible containment methods would be attempted?



3. The hay bales and plastic "protecting" the nearby streams will not stop the flow of bentonite and other chemicals in the waste slurry, into the river.





3. The boring is releasing sediment into the watersheds.





#4. Drilled holes are not being properly filled and mechanically compacted in 8" sections, but filled by hand. Above, NPT bore hole 23B, marker sinking in quicksand of boring slurry in bore hole. Slurry was dumped here and hosed for many minutes to move it into the grass and cover it up (below.) Boring waste is supposed to be collected and disposed of safely.



What the workers said: "Don't hate the player, hate the game."



Below: Bore hole 126; the "Downward NH Plan"



#5. Two bore holes (#8 below) from the first round of drilling in Easton were never filled which indicates the job was never inspected by DOT for compliance.



And what is this extremely elastic substance found at several drill sites?

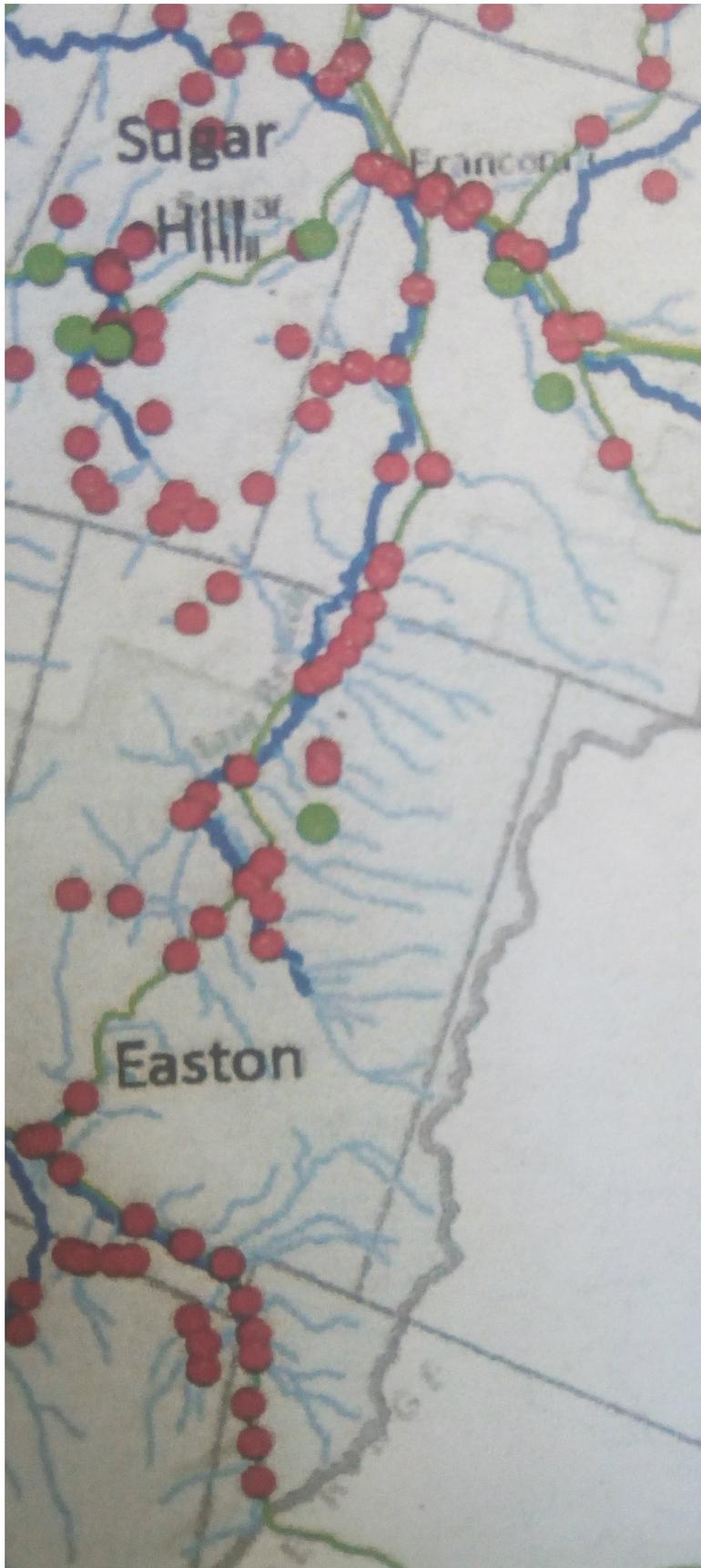


“At the time of borehole drilling, depending on the borehole’s depth and the formations drilled, generally two or three kinds of water-based drilling muds are used – bentonite drilling mud, polymer drilling mud without clays that diminish shale formation hydration, and a drill-in fluid that prevents permeability damage as well as possesses inhibitory properties. The main ingredient of bentonite drilling mud is the bentonite, which acts as a structural building component (Lewicka et al. 2008). However, in clay-free mud the structure and viscosity is built by biopolymer-XCD, high viscosity, plant-derived organic polymers or their mixtures (Steliga and Uliasz 2012). Attaining adequate drilling fluid properties and controlling them during vertical or horizontal drilling demands the use of chemicals and drilling materials (organic natural polymers chemically modified, organic synthetic polymers, chemical compounds derived from plants, minerals, or synthetic materials such as lignosulphonates, phosphates, surfactants, defoamers, lubricants, inorganic chemicals such as salts, bases, biocides, corrosion inhibitors, weighting materials), which are also a main source of pollution due to different biodegradability and toxicity issues (Steliga et al. 2012) “

<http://www.degruyter.com/downloadpdf/j/gospo.2014.30.issue-2/gospo-2014-0011/gospo-2014-0011.xml>

#6. Are the workers at this site given adequate protection from the substances they are working with?





Red dots represent water crossings of roads. Proposed route shown starts in Woodstock where the dots end at the bottom of the map below "Easton", continues west then north up Route 116 to Franconia (small writing), through Sugar Hill heading on (green) road. Main blue line is the Ham Branch River.

Below: Bore Hole 125, BMP?



Map provided by NH Fish & Game Department

#7. DOT readily granted NPT permits and is now lax and ineffectual with standards, oversight, enforcement and monitoring. DOT has \$30,000. per permit in escrow while towns, which are more likely to suffer damage, have nothing.

#8. DES readily granted NPT permits despite protests, and is now lax and ineffectual with standards, oversight, enforcement and monitoring.

#9. WMNF readily granted NPT a permit, trusted that NPT would adhere to their standards, and is now lacking in oversight and enforcement.

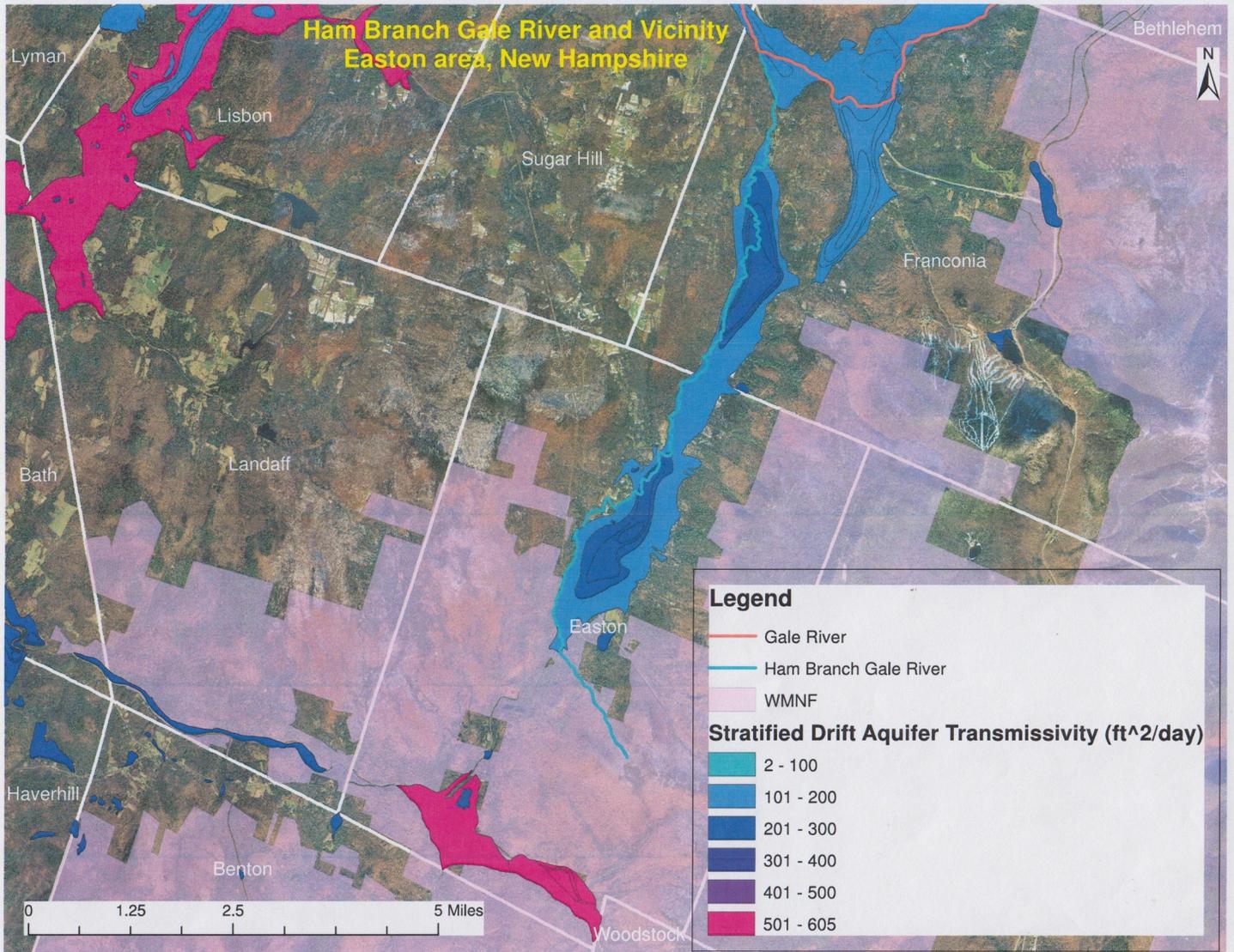
#10. The mitigation for the deep borings has not occurred. Mitigation should have been planned before the drilling and taken place during and after the drilling.

#11. Towns have not been given technical information about the drillings (potential for cross contamination of water bearing zones, alteration of groundwater chemistry), and material safety data sheets for the chemicals being used.

#12. DES, NPT, DOT and WMNF are failing to protect the aquifers on the route.

#13. What is in this bag, collected at one of the boring locations in Kinsman Notch? Pure bentonite does not cake like this:





In Easton, the proposed route travels from “Woodstock” on map west over high transmissivity aquifer on Route 112, heads north along Route 116 to and through blue aquifer area to Franconia border. Aquifer continues north under the route.

Kris Pastoriza  
 Easton, NH  
 August 7, 2016

