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**Subject:** DES and HDD

**10. Monitoring and Operations Plan for Installation of Underground Cable at Surface Water Crossings**

At least 90 days prior to construction of the underground segment (or within another time period acceptable to DES), the Permittee shall submit a Monitoring and Operations Plan (MOP) to DES for approval that identifies the method that will be used to cross each surface water, measures that will be taken to ensure compliance with surface water quality standards (Env-Wq 1700) and the process for notifying the appropriate state agencies if situations occur that are adversely impact surface water quality. For crossings employing Horizontal Directional Drilling (HDD), the MOP shall describe actions taken when operating under normal drilling conditions, when there is loss of circulation during drilling, and when there is a release of drilling fluids. If the circulation loss is a "fracout", the MOP shall describe the actions that will be taken to stop, contain and or control the size of the drilling mud loss to the environment.

DES,

why were no assessments of effects of HDD and Fluidized Thermal Backfill performed before you issued a permit to NPT?

Above is part of the DES permit to NPT. DES granted this permit with no assessment of potential damages to water resources by Horizontal Directional Drilling: DES did not assess damages that would occur a matter of course (normal industry standards of 3-9% loss of drilling slurry and additives to ground and as sealant for the interior of the boreholes) or through accident. DES did not require a frac-out risk assessment despite circulation losses in many of the geotechnical boreholes, and sub-surface conditions (gravel and cobble) conducive to frac-out. The SEC assigns to DES the responsibility to assess risks and damages to groundwaters and surface waters and the SEC will permit the project without considering them. Then, 90 days before construction NPT subcontractors will submit a bunch of BMPs (bull---ting many peoples) a frac-out contingency plan (brooms, booms and performing "focused visual monitoring") and it will be accepted by DES in yet another abidcation.



<http://midwestenergynews.com/2017/05/12/ohio-pipeline-spill-raises-broader-questions-about-oversight/>

Above: Stopping, containing and controlling the size of the drilling mud loss to the environment. This is not acceptable to towns on the route or in the watershed. Is it acceptable to DES?

"Every HDD drilling contractor has at least one massive "frac-out" nightmare story (usually a lot more than that). Lost circulation is a lot more than an annoyance. It is, depending on where it occurs, almost always an environmental nightmare, a time waste monster, and ... massively expensive and difficult to clean up."

Above and below, from industry: <http://www.leftlanellc.com/solutions>





Easton is slated to receive 7,000 gallons of slurry underground, through normal HDD fluid losses, from the 142,000 gallons to be used in drilling the total of 1 mile of HDD proposed here. Does DES even know what normal slurry losses are? Why didn't DES require a frac-out risk assessment, in order to fully assess the project? Does DES understand that in a real frac-out, there is no controlling or containing the drilling mud, especially if the frac-out is into a stream?

Has DES performed any assessment of effects of Horizontal Directional Drilling slurries on ground and surface waters? Does DES know the chemicals that will be used as slurry additives? DES had no problem with NPT "filtering" geotechnical boring slurry containing carcinogens and reproductive toxins with a haybale and the ground, before it flowed into local brook (or was that frac-out? ) or with slurry dumping on the roadside, so are we to assume that the same lack of standards apply to Horizontal Directional Drilling? DES permits forbid violation of water quality standards, without defining what these are, or testing for them during construction. And NPT knows that frac-outs will just mean a "sorry" and a necessarily inadequate clean-up, with no consequences to the corporation, since they have placed this on the sub-contractors.

The DES member of the SEC threw softball questions to Northern Pass's environmental panel. He practically did Mr. Needleman's re-direct for him. This is the voice of DES.

DES, despite its talk about dedication to water quality in New Hampshire, has not only approved Northern Pass, but will let the SEC pre-empt local water-protective zoning and ordinances that were put in place because the State and Federal standards are inadequate for water protection. Senator Shaheen sponsors a bill for increased testing of water supplies, while DES adds to pollutant loads.

Has DES thought seriously about its long terms strategy of selling the right to damage wetlands, or for preserving one wetland in exchange for destroying another? Has DES thought about the ethical problem of accepting huge amounts of money if they permit projects like NPT and having to turn the money down if they reject the project? Has this caused DES's astonishingly low rate of permit rejection? Is it right and good for New Hampshire wetlands and water quality if money can always buy a permit for damages from DES?

DOT HDD Guidelines state: "Drilling fluid disposal locations are hard to find." Where are NPT's? DES does not know.

And what about the 50+ miles of 4 foot by 3 foot fluidized thermal backfill french drain? Northern Pass's environmental panel did not care to comment on what effect a subsurface french drain over Kinsman Notch might have on water contamination and water flows. Does DES?

Kris