

January 13, 2016

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE Room 1 A
Washington, DC 20426

re: Tennessee Gas Pipeline Company, L.L.C., Docket No. CP16-21

From Mason (NH) Pipeline Committee

RE: TGP provides false number for miles of new NED ROW

Dear Secretary Bose:

It is appalling that at this advanced stage in the FERC process TGP continues to put forth the lie that only a few miles of new ROW are needed for the Wright to Dracut pipeline. TGP stated in their 12/28/15 response to FERC's 12/8/15 information request on NED: "the proposed route (*referring to NED Market Path*) incorporates 173.57 miles of co-location with existing utility easements and only 14.29 miles of new ROW." (1)

In truth, this pipeline will require a completely new ROW corridor to be obtained beside the 77+miles of Eversource powerline easement across southern NH. Along this corridor NED will double the width of intrusion into private property and public conservation lands with associated destruction of forests, wildlife habitat, wetlands and water resources. In the town of Mason, NH, alone at least 9 miles of new ROW will be needed, including more than 5 on NED's Fitchburg lateral.

With their deceptive use of "co-location", TGP implies the NED project will be sited almost entirely within existing utility easements, so people will assume the pipeline will cause little new disturbance. But TGP's maps reveal that the pipeline is NOT located within the Eversource powerline easement.

This has to be so, because the powerline easement is specifically limited to the transmission of electricity and intelligence ONLY. This is clearly stated in property deeds: for example, Mason Conservation Commission's protected land crossed by the Eversource easement. (Hillsborough County Book 2058, pp.153-55; Book 8577, pp.1770-72) Nearly ALL of NED Market Path will require new ROW easements, meaning that TGP must negotiate with many hundreds of resistant landowners, more than half of whom (up to two-thirds of landowners in some areas) have denied TGP access to survey their property.

Indeed, the siting of pipelines close to powerlines is dangerous, accelerating the rate of pipeline corrosion. To combat corrosion, large grounding arrays are required, necessitating the acquisition of further ROW for grounding. This is a significant consideration, given that the Pipeline Safety Trust of the US Pipelines and Hazardous Materials Safety Administration has documented that gas pipelines installed since 2010 have more incidents annually than those installed in ALL previous decades. (March 2015)

Please require that TGP state the true miles of new ROW that must be acquired for NED, both for the pipeline and its grounding arrays. The true figures of new ROW must be shown in TGP's tables. This truth is necessary to dispel any false impression that the Wright to Dracut route is less disturbing than following the existing Alternatives, the 200 and 300 pipelines.

FERC should require the true numbers in order to make a wise decision. Thank you for your consideration.

Sincerely,



Liz Fletcher
Mason NH Pipeline Committee

(1) TGP's December 28th response to FERC's December 8, 2015 Environmental Information Request No. 1, (20151230-5351(31114660), page 19-20: Tables 3 and 4 also show these deceptive figures.

Cc: Gov Hassan
NH Site Evaluation Commission
Executive Councilor David Wheeler
Executive Councilor Colin van Ostern
Executive Councilor Christopher Sununu
Executive Councilor Christopher Pappas
Executive Councilor Joseph Kenney
Senator Shaheen
Senator Ayotte
Representative Kuster
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Representative Chris Adams
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