From: Tim Winship [mailto:tim@newfieldfarm.com]
Sent: Friday, February 26, 2016 3:14 PM
To: Monroe, Pamela
Subject: Response to Request for Advance Public Comment on Rules Related to Certificates of Site and Facility, Site 300

Dear Ms. Monroe,

Thank you for the opportunity to comment on the proposed rules. Besides the list of items below, which you may have already seen, I would like to add two other considerations.

1) In the case of natural gas pipelines, please require the use of the highest quality pipe, which would include using the same thickness pipe in rural areas as in urban areas. It has been suggested that with regard to the Kinder Morgan/TGP NED pipeline, the companies have said they would use thinner walled pipe in rural areas because of lower population density and therefore the less harm that would result in the event of an explosion or other catastrophic event. Whether fact or rumor, if this is even a possible consideration/option for a pipeline company the SEC should insure that the highest standard must be used, regardless of location. I hope it's needless to say that the lives of those who live along the route of a pipeline, whether urban or rural, are equally important and deserving of all possible protection.

2)We have owned and operated a small, commercial, vegetable and blueberry farm using organic methods in Temple, NH for 30 years. Our business, like all farms, depends on clean air, water and soil. Currently, those conditions prevail where we live. Kinder Morgan/TGP's compressor station proposed for New Ipswich would be approximately a mile away. I ask the SEC to require that any company proposing
an energy facility, including a natural gas pipeline's compressor stations, be required to provide baseline air, water (surface and well), and soil testing prior to construction of the facility that would include testing for substances that are known to be emitted from such a facility. The testing should be done within an area that encompasses where research has shown the chemicals, gases, and/or particulate matter released from the facility are known to settle and accumulate. I would also ask that the SEC require continued monitoring during and after construction of the facility, and periodically during operation of the facility going forward. If there is evidence that the facility is degrading the air, water, and/or soil, then I ask the SEC to require that the company responsible alter their operations to stop continued contamination of these resources and show how they will mitigate any damage that has already occurred as a result of the operation of their facility. Finally, I would ask the SEC to require that if the company is unable to dramatically reduce or eliminate, in a timely manner, any degradation of air, water, and/or soil quality caused by their facility, and to mitigate any damage that may have already occurred, then the facility should be shut down until such remediation can be accomplished.

The second suggestion arises from the fact that I have to wonder why a company could come into an area and degrade the resources that humans, plants and animals all depend on for health and survival for the sake of that company's profits. An *extremely strong* justification of need for the project would have to be demonstrated to allow such effects to occur.

Thank you for your time.

Sincerely,
Tim Winship

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1. Public and Private Drinking Water Wells

a. Avoidance of aquifers that are used for public and private drinking wells

b. Identify impacts of blasting on groundwater for public and private drinking wells

c. Require hydrogeological studies to support application

d. Identify impacts and risks associated with hydrostatic testing

e. Identify impacts of air pollution from surface facilities (compressor engines, compressor blowdowns, condensate tanks, storage tanks, truck loading racks, glycol dehydration units, amine units, separators, fugitive emission sources, etc.) on dug wells

f. Testing and monitoring of public and private wells prior to construction (baseline) and periodically post construction; test for flow as well as contaminates (i.e., arsenic, radon, benzene, VOCs, etc.)

2. Public Health and Safety

a. Current state (baseline) of the impacted Town's Emergency Management, Fire Department and Police Department capabilities

b. Identify risks of proximity to high-tension electrical wires and other ignition sources; avoid EMI

c. Identify Emergency Response Plans; training and equipment; ability of Town's to respond to wildfires and other disasters; Mutual Aid impacts, etc.

d. Identify security requirements and associated risks

e. Identify system shut-down procedures; identify risks associated with road structure and conditions, terrain, weather, etc.

f. Require highest quality of pipe, considering health and safety impacts, not only population density

g. Use and management of dangerous substances; major hazards assessment and management; pollution prevention; solid and chemical waste management

h. Avoid steep-slopes; identify risks due to erosion, pipe cleaning and maintenance, etc.

i. Current state (baseline) of roads and public right of ways; impacts to roads for logging, construction and maintenance activities

j. Require road bonds prior to construction

k. Audits and inspections during operations

3. Air Pollution

a. Require a Comprehensive Health Impact Assessment

b. Require surface facilities (compressor engines, compressor blowdowns, condensate tanks, storage tanks, truck loading racks, glycol dehydration units, amine units, separators, fugitive emission sources, etc.) to be constructed to control emissions and prevent air pollution

c. Identify impacts to people, business, schools, local farms, surface waters, etc.

d. Twelve months of air monitoring prior to operation to establish current state (baseline)

e. Constant testing and monitoring for air pollution

f. Guidelines for levels of pollutants that shuts down the surface facility

g. Soil testing and monitoring to identify local conditions (baseline) and periodically after operation

4. Noise, Vibration and Light Pollution

a. Identify current local conditions (baseline)

b. Identify impacts to people, business, local farms, etc.

c. Requirements of local ordinances

d. Identify risks to homes, businesses and farms

5. Socioeconomic

a. Assessment of Baseline Social, Economic and Environmental conditions

b. Identify impacts to property values and abatement impacts on Town revenue

c. Identify impacts to local businesses

d. Identify local Master Plans; address impacts to Town planning and development

e. Require independent study of local economic impacts due to effects of project on Public and Private Drinking Wells, Public Health and Safety, Air Pollution, Noise and Light Pollution, Aesthetics and Deforestation, Threatened and Endangered Species, etc.

f. Require local resource taxes be paid by the applicant to include Timber Tax, Excavation Taxes, Local Permitting Fees, Change of Use (e.g., Current Use), etc.

g. Avoid disproportionate impact on low income and disadvantaged or vulnerable groups

6. Land Use, Recreation and Aesthetics

a. Identify impacts and risks

b. Identify impacts due to deforestation

c. Avoid land with current conservation easement or with non-development deed restrictions

d. Protect cultural property and heritage

7. Threatened and Endangered Species

a. Avoid Endangered, Threatened and Species of Special Concerns

b. Avoid Highest Ranked Wildlife Habitat

8. Alternatives

a. Identify and consider feasible environmentally and socially preferable alternative locations

b. Avoid use of Eminent Domain or condemnation

c. Consider efficient production, delivery and use of energy

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