

Ms. Monroe,

Thank you for the opportunity to provide comments on Chapter Site 300 Rulemaking as it pertains to high pressure gas pipelines. Please note that these comments are specific to the Town of Milford, NH, but would likely be applicable to many New Hampshire communities.

Additionally, we request that the deadline for submission be extended beyond February 29, 2016 to allow municipalities, other concerned organizations and the general public a reasonable opportunity to respond in this process.

Specific Concerns & Recommendations

1. Due to the nature of the construction equipment, materials and supplies required for pipeline construction, all high pressure gas pipeline companies must secure the required Town permits and bond all roads, bridges, culverts and railroad crossings for damages caused during the construction process.
2. The pipeline should be protected within a tube (slip lined) that extends under the entire roadway including shoulders at all road and railroad crossings completed with either standard open cut or conventional boring methods.
3. The current proposed high pressure gas pipeline route passes through densely populated residential neighborhoods near Federal Hill Road. There are numerous cul-de-sacs and roads that the proposed pipeline route would intersect. The NH SEC must ensure adequate access & egress for residents on all roads, cul-de-sacs and neighborhoods.
4. Pipeline companies are evaluating corrosion protection systems including fusion bonded epoxy coatings, abrasion resistant overlays (ARO), concrete coatings, cathodic protection systems, etc. The NH SEC must set an expectation that the best system(s) be utilized in high consequence areas (HCAs), adjacent to high voltage electric power lines and through residential areas, sensitive environmental areas, steep slopes and rocky terrain.
5. The NH SEC must evaluate Milford area emergency response capabilities, equipment, training and ability to respond to wildfires and potential pipeline related disasters. High pressure gas pipeline companies should be required to support emergency responders with technical training and financial resources annually to protect residents.

6. The proposed high pressure gas pipeline route between Federal Hill Road and Ponemah Hill Road should be considered a Class 3 location. The NH SEC should insist that the pipeline company use remote controlled valves (RCVs) as part of the pipeline design and strategically locate these RCVs and sectionalizing block valves to protect NH residents. Block valves have a means to vent the pipe to reduce the internal pressure in an emergency situation. Class 3 locations also require an increase to pipe wall thickness. Class locations are categorized by the extent and type of development within the boundaries and are detailed below:

Class 1. Locations with 10 or fewer buildings intended for human occupancy.

Class 2. Locations with more than 10 but fewer than 46 buildings intended for human occupancy.

Class 3. Locations with 46 or more buildings intended for human occupancy or where the pipeline lies within 100 yards of any building or small, well-defined outside area occupied by 20 or more people during normal use.

Class 4. Locations where buildings with four or more stories above ground are prevalent.

7. The proposed pipeline route in Milford would directly impact the private drinking water wells and private septic systems of 32 residential properties within 300 feet of the pipeline. There are 185 residential properties within $\frac{1}{4}$ mile of the pipeline and 392 residential properties within $\frac{1}{2}$ mile of the pipeline all served by private wells and septic systems. Ledge and rocky soil conditions may require blasting, drilling and heavy excavating. The NH SEC must require that the pipeline company inspect and document wells, septic systems (including leach fields) and building foundations for quality and serviceability for all property owners located within $\frac{1}{4}$ mile of the pipeline prior to and during construction, maintenance and operation of the pipeline. Drinking water should be checked quarterly for any change in quality or flow during the first year of pipeline operation. Property owners should be compensated by the pipeline company for all costs associated with any change in quantity or quality of drinking water, any damage to septic systems or foundations and "made whole".
8. Many residents along the proposed route in Milford have mature trees that block the view of the high voltage power lines from their homes. The NH SEC should require that the pipeline company work with homeowners to select and then plant fast growing trees to restore this tree lined border along the corridor ROW.

9. High pressure gas pipeline companies must identify, assess and avoid Historical sites in close proximity (1/2 mile) of the pipeline ROW.
10. The NH SEC should require a twelve month monitor period to establish a baseline for air quality testing prior to construction. The air quality testing should be ongoing during construction and operation of the high pressure gas pipeline.
11. The NH SEC should require that the high pressure gas pipeline company respect and avoid areas set aside with permanent open space and conservation easements.
12. High pressure gas pipeline companies must review the Milford Master Plan and comply with water and groundwater provisions, drinking water protection plans, conservation plans, social & economic requirements, recreation details and plans to preserve the rural character of the Town.
13. The NH SEC should require that the pipeline company evaluate wetlands and natural flow/drainage prior to construction. Damage from construction, blasting, vehicle movement, fluid leaks, etc. must be repaired to guarantee groundwater protection and environmental integrity.