

From: M Learner [<mailto:mzlearner@gmail.com>]
Sent: Sunday, March 06, 2016 6:41 PM
To: Monroe, Pamela
Subject: Additional comment to Docket 2016-01

Dear Mrs. Monroe,

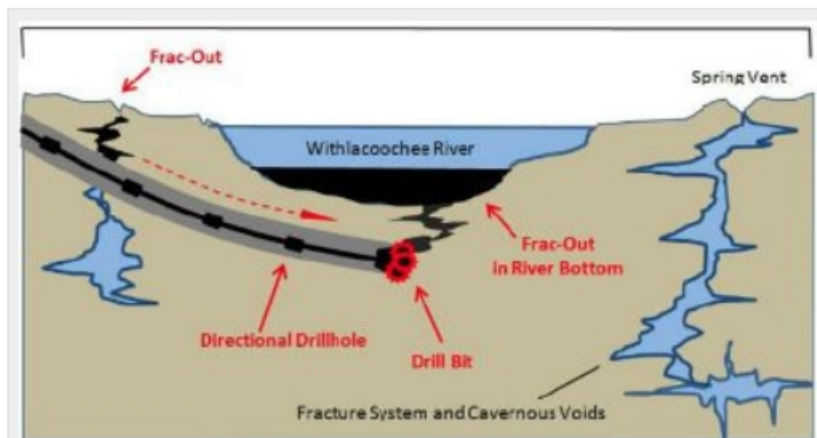
Please accept this addition to comments that the DEC ought to consider re: siting and construction of high pressure gas transmission pipelines.

I was unaware of this issue before this weekend and I believe this is well worth including in SEC regulations. Kinder Morgan should be required to provide a "Frac-out" contingency plan for everywhere that the use of HDD is proposed.

Yesterday at the Massachusetts Association of Conservation Commissions annual meeting there was a presentation called "Gas Pipeline Construction and Maintenance Considerations for Conservation Commissioners." They learned about the pipeline construction pitfall of Horizontal Direction Drilling (HDD) called "frac out." "Frac out" is when HDD goes awry and the drilling mud, bentonite clay mixed with water used to keep the drill bit from overheating, escapes into the wetland through fissures in rock, or other "weaknesses", suffocating everything in its path.

Kinder Morgan must be required to provide a Frac-out Contingency Plan. Apparently despite precautions taken, "it happens all the time." Recently a "frac out" destroyed a multiple acre shellfish bed (location not given).

Clearly this is a huge concern for everywhere HDD is proposed, but especially wetland resource areas.



Schematic showing cross-section of the proposed HDD crossing of the Withlacoochee River and hypothetical karst features that could result in a hydrofracture (frac-out), significant loss in drilling fluid and potential loss of the borehole. Source: August 2014 report by geologist Robert Brown

Thank you for considering this request.

Marilyn Learner
Hollis