

June 20, 2016

Re: SEC Docket 2016-01; Rule Making Notice: Site 301, Site 302

I am pleased that a Comprehensive Health Impact Assessment and Class 4 pipeline thickness were included in the proposed regulations. I was surprised and disappointed to see that specific recommendations from previously submitted comments regarding set backs, waste disposal, water use and disposal, road use, safety, comprehensive health impact assessment implementation and funding, herbicide use and notification, emissions, air quality monitoring, grounding, corrosion and other aspects of gas pipeline construction, operation and decommissioning were not included. As specifics have now been requested, I hope those previously submitted comments covering technical specifications and the white paper on the Comprehensive Health Impact Assessment will be revisited, with attention paid to incorporating many of the specific requirements they provide.

I am not an engineer, a public health professional or a lawyer. I can not provide specifics regarding construction, operation, decommissioning, etc. nor can I express and remedy my concerns in legalese. I comment as a concerned NH citizen who has learned about serious problems caused by fracked gas transmission pipelines. With all due respect to the work that has already been done, I expect and trust that the SEC will take the time to consult impartial and technically qualified experts about how to incorporate best current technical construction and operation practices in new regulations so that NH is protected from minimum quality construction, operation and maintenance practices.

The federal government might approve a project, but standards applicable to how the project is built, maintained, managed, operated, and decommissioned are the purview of impacted states. We are NOT pre-empted from protecting and preserving our natural resources, environment and citizens by requiring best current technical practices. Reputable companies expect and will comply with best practice requirements; sub-standard operations must be discouraged and ferreted out by stringent code requirements and enforcement. Not having specific and strict regulations in place hurts the public.

In the NED debacle, the public had extensive experience with the ground operation of KM, a company that apparently considers the NGA via FERC to be a carte blanc permission slip to do or say anything to push through their project and views local constraints and parameters on their potential profits to be bothersome interferences.

Legislators and commissioners possibly had cordial interactions with KM lobbyists and representatives who were bent on selling the merits of their project, but the public interacted with their ground forces and bore the brunt of their bullying tactics, disregard of legal postings, inattention to detail, doublespeak, conflicting answers, and "mis-truths" at informational hearings. In retrospect, KM clearly had no intention in providing (and could not have provided) specific answers to the reasonable questions residents and town officials were asking.

Our entire federal Congressional delegation became involved because of constituent advocacy requests, and is well aware of the lack of credible information, mistreatment, and abuse that the public endured. It is not what corporate representatives SAY; it is what the corporation DOES. Minimal regulations (which were heretofore adequate for NH's existing transmission

infrastructure) apparently signaled a very low bar regarding acceptable corporate behavior; strict regulations might have set a high bar for expected behaviors.

In claims to its shareholders, KM claimed to have cancelled NED due to (in addition to lack of customers) "lack of extant infrastructure" in NH. If the company had done their due diligence regarding NH's topography, hydrology, roads, etc. instead of printing glossies, outfitting temporary employees in matching blue shirts, creating commercials and mailings, and wooing legislators and business executives, they might have known AHEAD of time what NH was actually like. KM put more effort (and probably dollars) into promotion and marketing than into the nuts and bolts specs required to potentially build the pipeline. They acted as though they believed that because NH has few regulations regarding high pressure transmission pipelines, they could essentially run a "design/build" project, figuring out the route as they clear cut, blasted and trenched, complying with bare minimum standards, and dealing with restoration and mitigation plans later.

NH dodged a bullet when KM cancelled NED. Imagine having a company with a track record of "MY profits come first" as a permanent partner! NH is too precious to NOT have in place rigorous, up-to-date regulations which serve to preserve our quality of life by ensuring least possible harm to our human and environmental resources. Operational issues as well as construction issues must be considered. Fracking as an extraction technique has changed the emissions, by-products and wastes resulting from the operation of high pressure transmission pipelines and related facilities. New pipeline construction techniques are under review due to high failure rates. NH must provide very strict guidelines about what is acceptable for and in our state.

The SEC has a unique opportunity to effectively craft and adopt construction, operation and decommissioning standards in the form of new enforceable regulations which protect NH citizens and resources in the present and the future.

Thank you for considering my comments.

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