

From: Julia Steed Mawson [<mailto:islandview999@gmail.com>]

Sent: Wednesday, June 22, 2016 1:33 PM

To: Monroe, Pamela

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Subject: NH SEC comments due today

Dear Administrator Monroe

Please find my comments re the NH SEC rules due today.

I want you to know that I appreciate the work being done on this, especially given that there are no easy answers to our energy, environment and community issues. However, knowledge and awareness are good foundations to enable us to make the best decisions possible. Having a set of rules that give strong guidance are essential in helping to protect NH and its citizens regarding the potential negative impacts of high pressure, industrialized gas pipelines. It is difficult work today, but essential for the future. I feel that I speak from some experience as perhaps many of us actually have ...

When I was a senior at Lowell Technological Institute, I had to be fully immunized to work as a biologist on the Merrimack River and Lowell Canals. That was all part of the unintended consequences of the release of industrial and municipal effluent into the river. Now years later, we can recreate on it and many towns use it for their drinking water. But what an enormous, enormous cost in peoples time and huge amounts of money to work to establish the Clean Water Act and then to fight to mitigate the issues to work towards cleaning up a river like the Merrimack.

So thanks to you and the Committee for your willingness to work to try to tackle the unintended consequences before they occur.

We aren't magicians and we can't foresee everything, however, now, unlike in the early mill days way back then, we have no excuse to not try.

Please let me know if I can be of any assistance or if you have any questions. My contact information is below. I will call your office in an hour or so to make sure that you received this e-mail.

Regards,

Julia

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*if you think you are too small
to make a difference,
try sleeping with a mosquito.
Dalai Lama*

Pamela G. Monroe, Administrator
NH Site Evaluation Committee
21 South Fruit St. Suite 10
Concord, NH 03301

June 22, 2016

Dear Administrator Monroe,

I am writing to follow up on my statement made to the Committee during your last meeting of June 17th **and to include some new comments re pipeline siting rules 301, 302 on SEC docket # 22016-01**. As I noted in my initial statements, I am grateful for the work that the NH SEC is doing and thankful for your willingness to hear my concerns and input regarding SEC rulings. I am a biologist and environmental educator by training and an Extension Educator Emeritus with the University of New Hampshire. I also am a member of the Pelham Pipeline Awareness Outreach Subcommittee, serving over 400 Pelham residents and well as working with the many of our “neighbors” across NH that are concerned about wise decision making regarding pipeline infrastructure.

Because of the advances in fracking technology within the last ten years, we are in a Gas Rush. This situation is affecting our whole nation and resulting in the oil and gas industry moving fast and unfortunately cutting corners on safety, health and research. Research regarding: pipeline construction and maintenance practices, the true economics impacting ratepayers: impacts on health both in humans, water and wildlife; its chemistry as a potent greenhouse gas; and its impacts on climate.

The work that you are doing is so very important ...

I noted that I agree with the statements made by precious speakers. Further, I especially very much appreciate your inclusion in these draft rulings the language regarding the requirement of Comprehensive Health Impact Assessments. However, there is language that I did not see, language that I ask that you include regarding:

1. Pipeline Infrastructure: Language in the NH SEC Rulings need to include specific references and practices not just to pipes and compressor stations, but to pigging stations, valve stations, take stations and any other infrastructure involved in the process of building, maintaining and operating any high pressure pipelines in NH.

2. Pipeline construction and materials: Prevention of corrosion is a key component of keeping pipelines from leaking and exploding. Current US standards for coatings is to have coatings that are about .3 mm thick. In Europe pipeline coatings are nearly 1 mm (about 3.4 inch) thick to ensure that pipes last longer and pitting and corrosion do not occur. We in NH should require that coating thickness be increased to European standards.

3. Pipelines and Water crossings: Because of the extensive history of use of our waterways as dumping grounds for effluent from mills and cities, Language needs to be included that references specific concerns regarding prevention of the release of heavy metals from sediments due to drilling under rivers and streams.

4. Pipeline accidents and Incidents: In light of the increase of accidents with gas pipelines nationwide to occurrence rates that were equivalent to those seen before the 1940's, the Pipeline Hazardous Materials and Safety Administration (PHMSA), the Pipeline Safety Coalition and the Pipeline Safety Trust have initiated public comments regarding updating their rules which have not been updated since 1978. **I am very concerned however, that this NH SEC process (which**

closes comments by the end of today, June 22) will not include the final new information done by PHMSA since their deadline for public comments is July 7th - the same day that the NH SEC rulings are due to our legislature. What interface and consideration will be given by the NH SEC to there new rules?

I am including at the end of this e-mail an attachment of the slideshow presented at a recent webinar provided by PHMSA and the Pipeline Safety Coalition regarding a draft synopsis of their new rules that may be of importance.

5. Incineration Zone: Language concerning the notification to residents regarding the “incineration zone” (1,500 feet for a 30”, 1400 psi pipe) must be included. Further, rulings are needed articulating that SEC analysis will be made regarding risks to residences, schools, energy facilities, active quarries, and population centers.

Please note that In spite of industries statements to us that “incineration zones” are an “urban legend”, evidence of it can be clearly seen in the aftermath of the explosion in Greensburg PA on April 29th, 2016.

If industry cannot help us with calculations re the extent of blast zones, then I am sure the military and Homeland Security can ... with precision.

6. Pipeline Leaks: Language must be included to articulate that industry must articulate a monthly schedule and methodology for monitoring pipeline leaks (beyond saying that they have instrumentation in Texas that monitors pressure ... which clearly is not the whole answer since researchers in Boston, Drexel U and other institutions are now seeing that methane leakage is pervasive and massive. If the monitoring systems in Texas were actually seeing pressure changes, they would see pressure changes due to leaks.

7. Climate Impact: Language needs to be included that requires industry to articulate the impact of its pipeline proposal from production facilities (well heads, refinery, etc) to the customer whether domestic or overseas. Safety regulations currently do not cover production facilities. We need to take the lead in NH to require that if a pipeline company is going to be connected to a production site without transparency, rules and practices re eliminating methane leakage and chemical contamination, then that pipeline company is a company that is not welcome in NH. (It is analogous to clothing production overseas. If the country overseas is using child labor (the production facility), then the US company and ultimately the consumer should know it and seek another country to work with.)

8. Blowdowns and other releases: Pipeline companies should be required by NH SEC rules to reveal the amounts and types of emissions released from compressor station blowdowns, pigging station clean outs, and any other operations resulting in materials being removed or released from pipes or infrastructure.

9. Hydrostatic Testing: I did not see a reference to oversight of this. Because of the huge amounts of water used in this process, SEC needs to address how much water will be used, exactly where it will be taken from, what pumping methods will be used to do that. Further, hydrostatic testing wastewater should not be allowed to be released to the ground and allowed to “naturally percolate and clean itself” but should be trucked off site to an appropriate water treatment plant and then released in a clearly identified and monitored site.

10. Forest Loss and Carbon Sequestration: There is a growing understanding of the value of forests - especially old grown forests - with respect to carbon sequestration. Pipeline development requires massive amounts of forest clearing for the staging of materials and equipment, compressor station and other infrastructure and the pipelines themselves. SEC analysis needs to include an review of of forest age and the climate and economic impact of loss of the ecosystem function of these forests regarding carbon sequestration and ultimately climate with regards to NH's overall contribution to mitigating climate change.

11. Air-shed analysis of compressor station and infrastructures: Because NH is in a New England air-shed that is located near the end of the "atmospheric sewer" caused by our location east of the prevailing western winds, SEC needs to analyze the location and function of not just NH structures but those in nearby states to determine impacts of emissions or fallout from other pipeline projects.

12. Impacts on Orderly Development: Through community profiles, master plans and listening circles, NH residents over the years have consistently voiced that maintaining the rural character of NH is important. Language needs to be included in SEC rulings that address a study of long term impacts on development - on the state's historic, cultural, community and environmental resources. My example is this look at Dracut MA. They allowed industrial development to come to their town without long term analysis. They now have experienced 5 haz mat cleanups, the need to put neighborhoods on public water supplies because of contamination and are at ground zero for gas development, yet they still struggle with lack of funding for town services. Clearly industry has not helped them financially.

13. Analysis of Energy Need: There is currently no process in NH to review analysis of need for any project. The FERC process has none either, nor do they look at energy projects region-wide to ensure that overbuild does not occur or that the correct technology is used to provide diversification of energy. NH needs to take the lead and incorporate a Comprehensive Analysis of Need to the SEC review process for pipelines and other energy projects.

Thank you for your time and attention. We know that you are all busy, so your attention to this is all the more appreciated. Please let me know if I can be of service or if you have any questions or concerns. My contact information is below.

Regards,
Julia Steed Mawson

member, Pelham Pipeline Awareness Outreach Subcommittee

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***(I would argue that exporting our precious fossil fuel resource should NOT be encouraged since this finite resource should be carefully used and guarded for future generations, while also putting us at risk for higher energy prices here where domestic markets will match the costs overseas ... but that is another story.)**

