



December 22, 2017

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20216

Re: Docket No. CP14-529-000, TGP Connecticut Expansion Project

Dear Secretary Bose:

We write to comment on the apparently unauthorized and unanticipated discharge of contaminated hydrostatic test water into or near a tributary of the Worthington Brook, a coldwater fishery in Agawam, Massachusetts. Mention of this discharge was buried within today's Bi-weekly Status Report filing by Tennessee Gas Pipeline Company, L.L.C. ("Tennessee") for the above-referenced project. Tennessee previously received authorization to haul its contaminated test water offsite for disposal in Maine, according to press reports.

In a response – compelled under threat of civil and criminal penalties – to a U.S. EPA letter marked "Urgent Legal Matter," Tennessee was forced to explain that its contractor "did not notify Tennessee's Environmental Inspectors, project management, or environmental staff of its intent to discharge; the Inspectors and staff first learned of the discharge on November 27, 2017 when Tennessee's water removal contractor came to haul the water off-site to an approved disposal facility, and there was no water in the Tank."¹

We are given the assurance that "Tennessee's contractor has stated that the discharged water infiltrated the ground and did not enter any body of water."² Tennessee does not clarify whether this discharge contaminated the groundwater. Tennessee acknowledges, however, "Measures that might have helped to prevent the discharge include posting signage on the Tank with directions not to discharge the water without authorization from Tennessee, and placing a lock on the valve of the Tank."³

This discharge, and Tennessee's explanation, are further confirmation that scheduled inspections and self-policing do not work. Measures that might prevent such discharges and further environmental violations by Tennessee include: keeping the company and its contractors on a much tighter leash in all federal, state, and local permitting, with strict procedures that must be followed for all project aspects; eliminating self-policing by Tennessee and other pipeline builders, given their track record of sloppy practices resulting in contamination to water

1 Responses filed with Tennessee's Biweekly Status Report for the Period December 3 through December 16, 2017 (available at http://elibrary.FERC.gov/idmws/file_list.asp?accession_num=20171222-5010).

2 Id.

3 Id.

resources throughout the country; and refraining from permitting new gas pipelines where they risk impacts to sensitive resources.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'K. Eiseman', with a long horizontal flourish extending to the right.

Kathryn R. Eiseman, Director
Massachusetts PipeLine Awareness Network
17 Packard Road
Cummington, MA 01026
413-320-0747

Cc:

David Webster, U.S. EPA Water Permit Branch Chief
Thelma Murphy, U.S. EPA Stormwater & Construction Permits Section Chief
Shauna Little, U.S. EPA New England Physical Scientist
Lealdon Langley, Director of MassDEP Wetlands and Waterways Program