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PIPE LINE AWARENESS NETWORK
FOR THE **NORTH EAST, INC.**
www.plan-ne.org

March 28, 2019

VIA EMAIL

Secretary Matthew Beaton
Executive Office of Energy and Environmental Affairs
Attn: MEPA Office, EEA No. 15879
Alex Strysky, MEPA Analyst
100 Cambridge Street, Suite 900
Boston MA 02114

Re: EEA #15879, Tennessee Gas Pipeline 261 Upgrade Projects, Agawam, MA
Second Set of Comments on Draft Environmental Impact Report

Dear Secretary Beaton:

The Pipe Line Awareness Network for the Northeast, Inc. (“PLAN”) submits the following additional comments in response to the Draft Environmental Impact Report (“DEIR”) submitted by Tennessee Gas Pipeline Company L.L.C. (“TGP” or the “Applicant”) for its proposed 261 Upgrade Projects (the “Projects,” including the 2.1-mile “Looping Project”).

Longmeadow Meter Station Location & Project Details:

TGP indicates in the DEIR that it is considering three potential sites for the Longmeadow meter station: two sites near sensitive resources and a third Applicant-preferred site with “no wetlands or other sensitive environmental resources.” Based on statements from TGP’s legal counsel at the March 27, 2019 site visit, we understand that TGP has secured legal rights to its preferred site, on Longmeadow Country Club property.

The documentation provided to the Massachusetts Historical Commission by the Applicant includes more details about infrastructure associated with the proposed Longmeadow meter station than what was provided to MEPA in the DEIR. Specifically, while the project details may have changed in the interim, as of September 2018, TGP intended to “use approximately 1-acre

of the southernmost portion of the golf course property to construct the meter station facility, which will consist of the following aboveground elements:

- Two 8” pipeline taps with valves will be installed on each of Tennessee's existing underground 24” and 30” pipelines near the meter site.
- Construction of four buildings:
 - 20-x-40-foot, one-story meter building that will enclose the gas meters that measure the gas volumes entering the site
 - 28-x-40-foot one-story regulator building that will house the gas pressure regulating equipment.
 - 6-x-6-foot remote telemetry shed to support the function of the gas meters
 - 8-x-10-foot instrumentation and controls shed to support the function of the site pressure regulators
- Aboveground pipeline appurtenances:
 - a gas filter separator (4-x-22 feet)
 - a water bath pipeline line heater (12-x-42 feet)
 - ordorizer [*sic*] injection valve and connection for a temporary pipeline pig launcher (6-x-24 feet)
- The tap valve site and meter site will each have separate fences around their perimeter.”

See Attachment A,¹ obtained by PLAN from the Massachusetts Historical Commission.

The Final EIR should provide further details concerning the proposed infrastructure listed above, including:

- The expected emissions and discharges associated with each of these facilities and appurtenances during construction and operation, including fugitive emissions;
- The mechanisms by which pressure is stepped down at the meter station, and any emissions associated specifically with the reduction of pressure before gas is released to distribution system pipes, including any emissions associated with pneumatic devices;

¹ PAL (Public Archeology Laboratory) Report dated September 28, 2018, on its Historic Architectural Property Reconnaissance Survey for the Longmeadow Meter Station Project prepared for TGP, p. 1.

- The purpose and duration of use of the temporary pig launcher, the location of the pig receiver, and measures designed to avoid improper discharges.

How, and how often, does TGP monitor and measure greenhouse gas emissions at its other meter stations in the Commonwealth? We seek estimates of operational and fugitive emissions at the proposed Longmeadow meter station based on practices and observations of the Applicant's other meter stations in the Commonwealth, and explanation of any mechanisms by which release of the pipeline product into the atmosphere will be prevented.

Lift and Relay Alternative:

TGP asserts (3.3.2.2 of the DEIR) that a "lift and relay" option is not viable because of the costs and impacts associated with using LNG as an alternative while the line is out of service during construction, and further asserts that "the construction impact from the larger line would be similar to that of the proposed Looping Project."

First, if the Longmeadow meter station is constructed and Columbia completes its planned Springfield and Longmeadow pipeline upgrades (or a suitable alternative is settled upon), there would be no need to rely on LNG: a stated purpose of the new meter station is to "increase operating flexibility by allowing bi-directional flow of gas across the river to also support the communities of Agawam and West Springfield in the event of supply loss from the Agawam Gate Stat[ion]."²

Second, TGP's assertion concerning the impacts of a new loop as compared to a replacement project are unsubstantiated. Why would a replacement pipe require any widening of the existing permanent easement, as required by the proposed Looping Project? To what degree could impacts such as tree clearing be avoided by selecting the "lift and relay" alternative?

Conflicting Information about Maximum Allowable Operating Pressure, Uprating Option:

Further explanation is required as to why gas being discharged from the proposed upgraded compressor could not be discharged at a higher pressure in order to accommodate an uprate of the pipeline rather than the proposed Looping Project. (See DEIR at 3.3.2.3.)

Resource Report 1 submitted with TGP's Connecticut Expansion Project (the "Connecticut Expansion") application states that the new loop on the 300 Line immediately south of CS 261

² See Columbia Gas' initial filing dated October 30, 2017 in DPU Docket No. 17-166 at 108 (<https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9172434>).

was “designed for an MAOP of 800 psig”³ and the new loops on the 200 Line were “designed for an MAOP of 880 psig”.⁴

According to another TGP filing submitted with the Connecticut Expansion application, both the existing 300 Line and the pipeline loop built for the Connecticut Expansion in Connecticut and Agawam (which both terminate at CS 261) have an MAOP that “varies from 719 to 800” psig, while “the MAOP of the existing 200 Line is 760 in the vicinity of the Massachusetts Loop” built for that project in Sandisfield.⁵

The Columbia Gas map we submitted with our comments on the EENF for these Projects indicates an MAOP for TGP’s pipelines in this area as having an MAOP of 750 psig; Berkshire Gas filings also indicated that the Northampton lateral, built at the same time as the Agawam Lateral, has an MAOP of 750 psig.⁶

In the instant DEIR, TGP states that the existing 10-inch-diameter Agawam Lateral pipeline “is supplied from the discharge side of existing CS 261, which operates a common discharge supplying two mainline pipelines and the 10-inch lateral, all of which have an MAOP of 700 psi.”

What is the actual MAOP of the 200 and 300 Lines flowing into CS 261? What is the actual MAOP of the Agawam Lateral? Why does TGP provide different MAOPs in different filings? What are the maximum operating pressures of these three pipelines in Agawam in practice, as opposed to the MAOPs?

If the 200 Line and 300 Line are designed to operate at 880 and 800 psig, respectively, and if the Agawam lateral was in fact designed for an MAOP of 750 psig, why would an uprating option to 750 psig — particularly combined with demand reduction measures planned and already being undertaken in the shippers’ service areas — not be a viable lower impact alternative?

Species of Conservation Concern:

The Applicant’s EENF specifies: “Most of the ROW [for the Looping Project] is located within or adjacent to Priority Habitat for State-listed rare species, including the Eastern Box Turtle

³ See TGP Connecticut Expansion Resource Report 1 section 1.1.2.3 (available at <https://elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15078250>).

⁴ See *id.*, sections 1.1.2.1 and 1.1.2.2.

⁵ See TGP Connecticut Expansion Resource Report 11, section 11.2.1 at 11-3 (available at <https://elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15078263>).

⁶ See Berkshire Gas discovery response in D.P.U. 15-178, Attachment Montague-1-16(d) at 10 (available at <https://fileservice.eea.comacloud.net/FileService.Api/file/FileRoom/9210205>).

(*Terrapene carolina*), a Species of Special Concern, and the Eastern Worm Snake (*Carphophis amoenus*), a Threatened species.” The DEIR spells out further: (1) “Eastern box turtles hibernate from late October or November to mid-March or April in upland forests, a few inches under the soil surface. They become active in the spring and females lay eggs in June or early July,” while eastern wormsnakes (2) “emerge from overwintering in the spring, and mate in May. Females lay eggs under decaying woody debris or rocks from mid-June through July. Hatchlings emerge in August or September.”

The Applicant’s EENF asserts that the Looping Project would result in a “take” of these species; given how the Looping Project has been designed, it is clear that take would indeed result. However, under the applicable regulations, no such take is permissible (or permittable) because viable alternatives to the Looping Project exist that would avoid impacts to these listed species. As discussed in our previous comments, such alternatives include the No-Action Alternative (coupled with alternative initiatives by the utilities for whom the Projects are designed), as well as perhaps a compression-only alternative, and others.

If the Projects are allowed to proceed, Mass Wildlife should be directly involved in the monitoring for these species rather than trusting the Applicant to find and report the animals whose existence impedes the Looping Project.

Mitigation and Restoration:

In our initial comments filed February 8th, we cited TGP’s claims that “extensive mitigation is proposed”⁷ yet no details were given for that mitigation or planned restoration in the Draft EIR. On March 24th, PLAN visited the pipeline construction areas within Otis State Forest in Sandisfield to view TGP’s mitigation and restoration efforts of their Connecticut Expansion project, put into service in November of 2017. Our observations of the still ongoing restoration of the right-of-way showed areas of minimal to a complete lack of established vegetation even on slopes leading to the cold water fisheries (“CWF”) stream impacted by wet trench crossing during construction. (See Attachment B photos.)

The failure of TGP to revegetate slopes to avoid erosion into the CWF streams has been documented by FERC and TGP’s own consultants who concluded “revegetation is not yet successful.”⁸ More than a full growing season has passed since construction was completed and still TGP cannot revegetate slopes leading to sensitive resource areas or even some in relatively flat upland areas. PLAN attended the MEPA site visit on July 27, 2018 to view impacted areas along the currently proposed Looping Project. TGP is proposing to cross 5 CWF streams for the

⁷ DEIR at 6.1.4.2, p. 143.

⁸ Year 1 Post-Construction Monitoring Reports - MA Loop, November 2018, p26, available at <https://elibrary.ferc.gov/IDMWS/common/OpenNat.asp?fileID=15166240>.

261 Projects along with the other documented BVW and wetland impacts. To date, TGP has failed to demonstrate an ability to provide adequate stabilization and revegetation of construction areas within and uphill from sensitive wetlands. The Final EIR must detail how TGP will avoid similar revegetation failures along the new Looping Project.

We also note that there has been no further progress regarding the land replacement mitigation defined by the disposition of Article 97 land for the Connecticut Expansion. Replacement land (“Mitigation for permanent impacts to wetlands will include off-site wetlands restoration and conservation of existing wetland areas”⁹) is also promised for the 261 Projects but lacking details as late as the March 15th Notice of Intent submitted to the Agawam Conservation Commission. Three years later, the public still awaits the mitigation required for TGP’s last pipeline project.

Horizontal Directional Drilling Impacts & Risks:

TGP indicates that it has proposed that “[a]pproximately 0.3 mile of the pipeline loop will be installed by horizontal directional drill (“HDD”).” In February, TGP filed with the Federal Energy Regulatory Commission (“FERC”) an HDD assessment document, in response to a FERC Environmental Data Request. TGP’s FERC filing states:

“[A]nalyse indicate a moderate risk of hydraulic fracture and drilling fluid surface release along the majority of the proposed Shoemaker Lane HDD, with elevated risk as the drill bit nears the designed entry point (over the final approximately 100 feet of the drilled path).”¹⁰

The DEIR states, “Generally, a minimum workspace footprint of **200 feet wide by 250 feet long** is required at the entry and exit points to support the drilling operation.”

Despite the increased workspace requirements and elevated risks that come with HDD, the HDD exit point is located **within a wetland** (“Wetland N”). How is the additional workspace requirement a benefit to the wetland? The DEIR also says both entry and exit points require a “slurry containment pit” and “and the heavy construction equipment necessary to support the operation.” The Final EIR should detail how this will be done without increased negative impacts to the wetland resource areas.

The 0.3 mile HDD at Shoemaker Lane shown in the DEIR appears to include the land under the Cecchi Farm property. The Final EIR should detail how Wetland N, MA5 the unnamed tributary

⁹ DEIR at p. 11

¹⁰ See “261 Upgrade Projects_HDD assessment.PDF” available at <https://elibrary.ferc.gov/IDMWS/common/opennat.asp?fileID=15159530>.

to Fourmile Brook, and the Cecchi Farm property will be protected from the potential of drilling fluid surface releases, commonly referred to as Frac-Outs, as described in the HDD Assessment.

Please hold TGP to strict compliance with the regulations and policies of the Commonwealth, which consistently prioritize *avoidance* of impacts over mitigation.

Respectfully submitted,



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