

To the Federal Energy Regulatory Commission requesting full information be distributed to public officials within the path of the project, that the clock for a 90 day comment period be re-set upon such distribution of information, and that a full EIS be prepared.

From: Carol I Chock, Legislator, Tompkins County NY and Chair of the Tompkins County Planning, Energy and Environmental Quality Committee

Re: **Docket Number CP14-497-000**

c/o Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Dear Commissioners:

This is to request that full information be distributed to me and to other elected officials within the path of the Dominion "New Markets" pipeline project, that the clock for a 90 day comment period be re-set upon such distribution of information, and that a full EIS be prepared. Further, I request that a scoping hearing be held in Tompkins County.

It has come to my attention that FERC issued a Notice of Intent on September 18, 2014 to conduct a lesser Environmental Assessment, which set only one hearing date and which established only a 30-day comment period. The Notice was to have been sent to "the Commission's current environmental mailing list for this Project," in which "state and local government representatives" were instructed to "notify their constituents of this proposed Project and encourage them to comment on their areas of concern."

I understand that the list was to have included "County Zoning and Siting Boards," "elected officials," and "local government representatives and agencies," as well as property owners along the path of the project. However, "County Zoning and Siting Boards" do not exist in NYS and I have not found evidence of due notification to either property owners or Tompkins County officials regarding this project. Tompkins County would also fall under the category of those who are "potential right-of-way grantors," as we either own roads or road rights-of way along the route.

Hearings have been held in the past when significant changes were contemplated to the Borger Compressor Station in our county, so it is a reasonable request for one to be held in this instance, either in combination with or following an informational meeting by Dominion about the project.

Please add both Tompkins County administrative officials, the Chair of the County Legislature, Town, Village and City officials along the route, and me to the environmental mailing list. I would also like to receive a copy of the EA when it is available and request that you make it available to the general public.

In addition, please find below some of my own initial comments regarding the nature and the scope of your review.

The Project:

The Dominion "New Markets" project will use approximately 200 miles of existing natural gas pipeline, including that in Tompkins County, some of which is 50 years old. The project would

increase by 112,000 Dekatherms per day the capacity of Dominion's main pipeline, which brings gas north from the fracking fields of Pennsylvania to the Finger Lakes, Syracuse, and points east to Albany.

To handle the increased volume, Dominion intends to build two large new compressor stations in Chemung County (Horseheads) and Madison County (Georgetown), expand a compressor station in Montgomery County, and modify its existing compressor stations in Utica and Schenectady, as well as the one in Tompkins County.

I ask you to provide complete information regarding this project so that we, our residents, our staff, and our organizations can weigh in with scoping requests.

Process:

I currently represent District Three on the Tompkins County Legislature, where I am also Chair of the County's Planning, Energy, and Environmental Quality Committee and Vice-chair of the County Economic Development Committee. I am a former chair of our Facilities and Infrastructure Committee. Since we did not receive the official notice, none of these Committees have had the time to review information about the Dominion "New Markets" project or to request that our staff prepare information for such review, or to consider whether to weigh in on behalf of the residents of Tompkins County.

I ask that you expand the official deadline for scoping comments to include a period that is at least 90 days following our receipt of information.

Tompkins County:

Our County has a population base over 100,000 and is home to three colleges including Cornell University, as well as a vibrant economy in the Finger Lakes region of New York. Our residents are active and informed. Over 900 people attended a public hearing about hydrofracking when it was first proposed for the Marcellus Shale. Residents ask us to stay informed and communicate with them about proposals regarding natural gas, its build-out, and associated infrastructure.

The Tompkins County Council of Governments conducted its own review of potential economic benefits and costs, community impacts, road impact. We projected direct costs and tax income from energy choices, and indirect costs, including those resulting from climate change, damaged streambeds, increase in need for trained emergency responders, and need to repair damaged roads and buildings following hurricanes and major weather events. In addition, we projected energy prices, including a potential price hike if gas is to be exported and priced on the international market.

Our residents would certainly expect the opportunity to weigh in regarding how FERC will review the Dominion project, in a local venue where they can hear each other's perspectives.

Environmental Review:

I note that FERC has issued its notice related to an Environmental Assessment (EA). The more comprehensive Environmental Impact Statement (EIS) process would result in greater depth in analysis of technical and safety issues.

As such, I request that FERC require a complete EIS.

Greenhouse gas analysis:

The Tompkins County Comprehensive Plan contains an element specific to the reduction of greenhouse gas emissions by 20 percent by 2020 and 80 percent by 2050. NYS has drafted similar goals. Are the rough estimates that the Dominion "New Markets" project will increase greenhouse gas emissions by 200,000 tons accurate? I note that the Dominion materials estimate the emissions from one of the new compressor stations, that at Brookman Corners, would fall just under the 100,000 ton threshold for a major emitter.

FERC should attain an independent analysis, which includes detailed information for each of the compressor stations, including for direct carbon, methane, and other gasses. It should also attain independently verified information for current gas leakage along the length of the existing pipeline, along with an independent projection of leakage expected from the increased pressure along the length of the pipeline and in each of the affected counties. Tompkins County is active in assessing our progress towards our GHG reduction goals, so that information would be relevant.

I request that independent analysis of GHG emissions be added to the scope.

Scope:

I request that you include the following in the scope of a complete review:

- Examination of potential impact regarding use of aging pipe to carry the increased volume and pressure of an additional 112,000 Dekatherms of gas per day.
- A thorough analysis of all direct, indirect, and cumulative impacts within each of the counties and for the project as a whole.
- Safety analysis regarding increased risk of pipeline failure along segments of pipe or at joints due to corrosion, degradation or other stresses that may have occurred over time or due to older welding methodology.
- Maximum allowable operating pressure, as well as how it will be verified and how it will be disclosed.
- Analysis of risk regarding fire or explosion at the proposed volume and pressure.
- Our local fire-fighters and emergency responders are often volunteers and ill equipped or trained to respond to catastrophic events such as uncontrolled gas fires, explosion, and widespread exposure of the public to gas and airborne toxic chemicals that could be released during an incident. Response capability and the need for additional training or full-time responders must be thoroughly evaluated.
- A comprehensive health impact assessment to evaluate potential effects in short and long terms to residents adjacent to and at expanding distances from each of the compressor stations. This should include effects of potential exposure to volatile organic compounds, nitrogen oxides, ground-level ozone and any other potential hazardous air pollutants. Design alternatives should be explored to protect the public from potential exposure.
- Noise analysis. My own visits to larger scale compressor stations demonstrated significant differences in noise levels at the larger volumes proposed for this project. A projection of the impact on nearby homes from expansion of equipment at the Borger Station.

- Examine, consider, and disclose prior safety and compliance records of the operator.

Please add to the service list:

Carol I. Chock Legislator, Tompkins County District Three
39 Woodcrest Avenue
Ithaca, NY 14850

I can receive electronic service at carolchock@gmail.com.

Mike Lane, Chair of the Legislator, and Ed Marx, Planning Commissioner,
Each at: 121 East Court Street, Ithaca, NY 14850
emarx@tompkins-co.org

Also add Tompkins County Administrator Joe Mareane,
125 East Court Street, 3rd Floor, Ithaca, NY 14850
jmareane@tompkins-co.org

Sincerely yours,
Carol I. Chock, Legislator
Tompkins County District Three

cc: FERC Chairwoman Cheryl LaFleur, Senator Charles Schumer, Senator Kirston Gillibrand,
Governor Andrew Cuomo, PSC Chair Audrey Zibelman,