

# Update on Skillman Loop of Transco's Leidy Southeast Gas Pipeline Expansion

Princeton Ridge Coalition (PRC)

August 20, 2014



Contacts:

Barbara Blumenthal ([barbblumen@gmail.com](mailto:barbblumen@gmail.com), m: 609-865-7958)

Adam Irgon ([adamirgon@gmail.com](mailto:adamirgon@gmail.com), m: 908-616-8107)

# Current Status – Princeton Ridge Portion of the Skillman Loop

- PRC Activities:
  - Wetlands in Princeton Ridge mapped correctly due to study commissioned by Princeton
  - Two reports documenting Threatened and Endangered species (T&E) on the Princeton Ridge filed with NJ DEP
  - Safety report commissioned by PRC and filed with FERC
- Transco Concessions:
  - Transco will fill the existing natural gas pipeline with water for the rock hammering phase estimated to be 3 to 6 weeks, and will perform safety tests
  - Pipeline right of way (ROW) will be 50 feet wide rather than 105 feet on the Princeton Ridge, lessening environmental damage
- FERC Environmental Assessment (EA) issued on August 11, 2014
  - Minimal data used for environmental review; does not show familiarity with local habitat
  - FERC ignores expert submissions other than by Transco; performs no independent analysis
  - Princeton and PRC will challenge the findings of the EA with comments to FERC

# Safety

- Transco's current plan is to run a 60-ton side-boom (pipe-layer) above the existing (1958) 36" pipeline to install the new 42" pipeline. Wooden matting is supposed to "bridge" the existing pipeline, but their calculations show it has little effect.
- The conditions here are unusually treacherous. The existing pipeline lies in a boulder field; boulders are likely to be in contact with the pipeline; in many areas the soil is saturated wetlands.
- The stress calculations by Transco assume dry soil and no boulders above the pipeline – both false.
- Independent safety engineer Richard Kuprewicz concludes that the plan poses **"high threat of dents with stress concentrators and gouges causing rupture and ignition."**
- Transco's contractor Henkels and McCoy is responsible for a fatal explosion in Ewing from 2" low-pressure pipeline. Princeton Ridge's existing pipeline is 36" with high pressure.





For more than 50 years, the Princeton Ridge's forest and wetland habitats have been identified as among the most important and environmentally sensitive areas in the region. Its mature forests are home to numerous endangered and threatened species, among them the Wood Turtle, Eastern Box Turtle, Cooper's Hawk and Barred Owl.

*-- New Jersey Conservation Foundation website*

# Threatened and Endangered Species (T&E) on and near the sensitive Princeton Ridge



Red-shouldered hawk (endangered)



Barred owl (threatened)



Bald eagle (endangered)

Wood turtle (threatened)



*Numerous other bird species of interest and other threatened bird species habitat*

# NJ DEP Roles



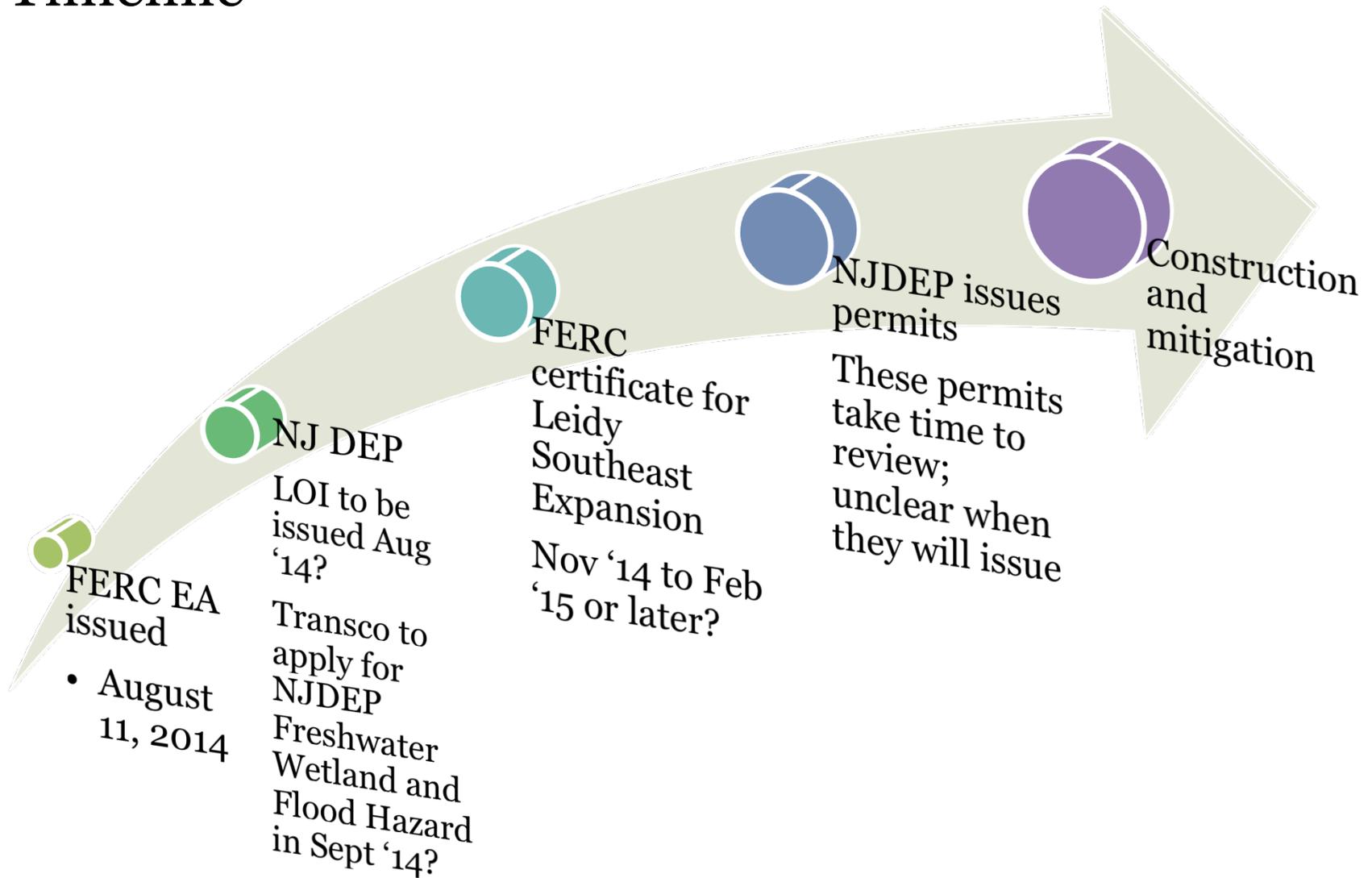
- NJ DEP issues permits under the Clean Water Act (delegated by Army COE). For this project:
  - Section 404: Individual Freshwater Wetlands Permit
  - Section 401: Water Quality Certificate, Individual Flood Hazard Permit
- NJAC 7:7A-7.1, *General provisions for individual permits*, requires that there be no practicable alternative to the proposed project which would have less impact on the aquatic ecosystem
- Transco provided very little environmental data to FERC for the EA. Specific information will be contained in the permit applications; it appears that Transco delayed filing to avoid a meaningful environmental assessment by FERC.
- Transco may assume that DEP will expedite the permitting process so that they can stay on schedule.

# Horizontal Directional Drilling (HDD) is a *practicable alternative* that resolves safety and environmental concerns

- Bore and pull through pipe about 75' below the surface
- PRC has refuted many of Transco's technical objections to HDD through the Princeton Ridge. While a challenging project, cost and time seem to be the company's primary concerns
- Estimated additional cost to the public: 1/20 of 1% (\$15M) of the NPV of the gas which will flow through the pipeline (\$30B).



# Timeline



August 15, 2014

Robert V. Kiser, P.E.  
Township Engineer  
Princeton Township  
400 Witherspoon Street  
Princeton, New Jersey 08540

**Re: Proposal for Regulatory Review of FERC's Environmental Assessment and Restoration Plans  
Princeton Ridge Section of Princeton Township  
Mercer County, New Jersey  
PH Project number 16.028**

**Dear Mr. Kiser;**

Princeton Hydro, LLC (Princeton Hydro) is pleased to submit this proposal to perform a compliance review and critical evaluation of the Leidy Southeast Expansion Project Environmental Assessment submission made by the Federal Energy Regulatory Commission (FERC) on behalf of Transcontinental Gas Pipe Line Company LLC. The assessment will focus on the section of the new pipeline through the Princeton Ridge section of the township. The review is designed to have two phases; the initial phases will focus on FERC's Environmental Assessment (EA) while phase two will focus on the applications to be submitted to the New Jersey Department of Environmental Protection (NJDEP). The following proposal will provide description of the services to be provided by each of the two phases.

### **Phase 1 Critical Review of FERC's Environmental Assessment**

This phase of the review will be based on a review of the information submitted as it relates to relevant New Jersey Department of Environmental Protection (NJDEP) regulations including the Freshwater Wetlands Protection Act, Flood Hazard Control Act and Water Quality Standards. This section is included even in the absence of formal applications being submitted by Transco to the NJDEP to highlight deficiencies in the discussions provided in the EA. The review will also provide recommendations regarding minimization of impacts, increased monitoring requirements to make sure the proposed project and the proposed compensatory mitigation meet their stated objectives. Examples of failed or poorly undertaken pipeline projects including some of Transco's will be incorporated into the review to support the need for more stringent requirements, the need for changes in the design and the need for greater oversight. A discussion of the projects cumulative impacts will also be included.

### **Phase 2 NJDEP Permit Application Compliance Review**

This phase of the review process will entail a critical review of all of the applications submitted to the NJDEP that are relevant to Princeton Township. At a minimum this will include applications related to the Flood Hazard Area Control Act, the Freshwater Wetlands Protection Act and the Stormwater Rules. Compliance with these regulations is a necessity for Transco and will serve as best chance to identify flaws in Transco's project design or approach. The review will also include an assessment of their mitigation measures.

Princeton Hydro will describe its findings in each of the two phases in a written document designed to be conveyed to either FERC or the NJDEP by either the Township or the Princeton Ridge Homeowners Group.

Princeton Hydro, LLC

- 1108 Old York Road Suite 1, PO Box 720 Ringoes, NJ 08551 t. 908.237.5660 f. 908.237.5666
- 1200 Liberty Place Sicklerville, NJ 08081 t. 856.629.8889
- 120 East Uwchlan Avenue Exton, PA 19341 t. 610.524.4220 f. 610.524.9434
- 20 Bayberry Road Glastonbury, CT 06033 t. 860-652-8911 f. 860-652-8922

Included in the proposed cost are two meetings to discuss the EA and the report. The estimated cost would be \$5,950.00 or \$2,975.00 per each phase. If this proposal is acceptable, please let us know and we will provide you with a contractual agreement for your review and approval. A signed receipt of one copy of the contractual agreement will serve as our authorization to proceed. Princeton Hydro will initiate the permit filing activities upon receipt of a written authorization to proceed.

Should you require further information on any aspect of this proposal please do not hesitate to contact me at our Ringoes, New Jersey office at 908-237-5660.

Sincerely,



Mark Gallagher  
Vice-President

Cc: Barb Blumenthal, Princeton Ridge Coalition  
G. Skupien, Princeton Hydro

P/16/proposal/Princeton Ridge/EA review