

July 31, 2015

Debra Howland, Executive Director  
New Hampshire Public Utilities Commission  
21 South Fruit Street, Suite 10  
Concord, NH 03301

Re: DG14-380

Dear Ms. Howland

My name is Paul Sullivan; I am an abutter to the proposed Tennessee Gas pipeline at 3 Autumn St., Windham NH. Segment J, Mile Post 34.80 I wanted to forward my statement from the 7/29/15 FERC Scoping Hearing. Your decision on the petition will facilitate the construction of the pipeline and all the associated problems that are inherent in this project.

*"In December of 2000, an executive of Tennessee Gas (TGP) testified before the NH Public Utilities Commission and stated,..."there are few, if any human endeavors, which can be undertaken without some impact to the environment."*<sup>1</sup>

*While I vehemently oppose this proposal, and find explanations and analyses riddled with double speak, misrepresentations and outright lies...I do agree with TGP on this point, there will be impact to the environment. An environmental impact, that will leave a permanent scar on the face of this state.*

*I wish to direct my remarks to the neighborhood in West Windham and the environmental damage this proposal will have.*

*I would like to raise two issues during this hearing.  
The first pertains to the lack of documentation on Wetland & Watershed areas.*

---

<sup>1</sup> NH PUC re: TGP, SEC89-01 p.8 12/28/2000

*It should be noted that this neighborhood is included in the Stratified Drift Aquifer<sup>2</sup> and also part of the Upper Beaver Brook Merrimac River Watershed<sup>3</sup>*

*Referencing the Tennessee Gas maps of 1/12/15<sup>4</sup> at mile marker 34.8 an 'unnamed stream' links a series of ponds and drains into Beaver Brook at mile marker 34.9. No 'wetlands' are delineated on the TGP map. But a simple review of town tax maps shows a Wetland & Watershed Protection District (WWPD)<sup>5</sup> along the western edge of Autumn St. including most of lot 19-B-919.*

*Construction in the WWPD would violate town ordinances<sup>6</sup> written for the protection of private wells and natural habitat.*

*The potential risks include:*

- Contamination from pipeline construction, including compounds used for field-coating welds before installation of pipe*
- Potential contamination of the watershed from herbicide use*
- Disturbance of soil in the ROW, staging areas and temporary construction access points will seriously increase the risk of invasive plant species*

*The nature of the watershed, which includes glacially, deposited sand and gravel are highly susceptible to contamination. "Wells located in an unconfined aquifer are considered to have a high vulnerability to potential contamination due to the absence of hydro geologic barriers (i.e. clay) that can prevent contamination migration into the aquifer from the surface."<sup>7</sup>*

*The second issue pertains to the aesthetics of the environmental damage.*

---

<sup>2</sup> Rockingham Planning Commission Map 12/15/09

<sup>3</sup> Rockingham Planning Commission Map 3/22/06

<sup>4</sup> Appendix A

<sup>5</sup> Appendix B

<sup>6</sup> Town of Windham NH, *Zoning Ordinance and Land Use Regulations* (amended March 10, 2015) re: 601.1.1 " Prevent the development of structures, or other land use within the WWPD that would contribute to surface and groundwater contamination or reduce surface and groundwater supplies."

<sup>7</sup> Source Water Assessment and Protection (SWAP) Report, MA DEP

*When this neighborhood was developed 35 years ago, the power line ROW had already been established. The builder preserved the natural buffer of trees to the ROW as the development took shape. Now comes TGP, who will remove the natural buffer and opening a vista comparable to a lunar landscape...no trees, no brush no buffer, just an unimpeded view of the electric ROW.*

*It's not just the abutter effected by this, but residents across the street, who once had a view of majestic trees will now have unimpeded views of the power lines and towers.*

*While these two issues have direct impact on the neighborhood, one fact needs to highlight this testimony. As of this date, Tennessee Gas cannot point to a spot on the ground and tell my neighbors...this is where the pipe will be placed!*

*Segment J uses construction technique ROW-CONFIG\_05 and \_06<sup>8</sup>, which could cause a clearing of either 45' or 85' from the centerline of the pipe. This is bad enough, but the fact is, we don't even know where the pipe will actually be placed to start with.*

*In its Environmental Construction Plan for NH, Tennessee Gas is '...proposing that the pipeline will be installed generally five feet outside the exiting power line easement boundary.'<sup>9</sup> But a few paragraphs later the proposal comes with a loophole...."adjustments may result in the centerline of the pipeline to be located with in an existing power line easement, less than five feet from the existing power line boundary, or further than five feet from the existing power line boundary."<sup>10</sup>*

*In other words, we are giving Tennessee Gas the option, to put it wherever its wants.*

*Members of FERC, you are asking us to offer specific environmental comments about this pipeline, yet you do not hold the Tennessee Gas*

---

<sup>8</sup> Appendix #3

<sup>9</sup> TGP, Environmental Report NED Project Appendix M, M-4 July 2015

<sup>10</sup> TGP, Environmental Report NED Project Appendix M, M-4 July 2015

*responsible to offer a specific route. You are asking for comments on a moving target.*

*I have serious reservations as to validity of the scoping hearing since the true route has not been established and the release of the draft EIS was only days ago.*

*I have spoken of the impact this will have in my neighborhood in the town of Windham. But my mind reels with the fact this will be repeated in hundreds of neighborhoods along the route.*

*To my fellow residents this should be a wake up call as to the power a private corporation can wield again citizens.*

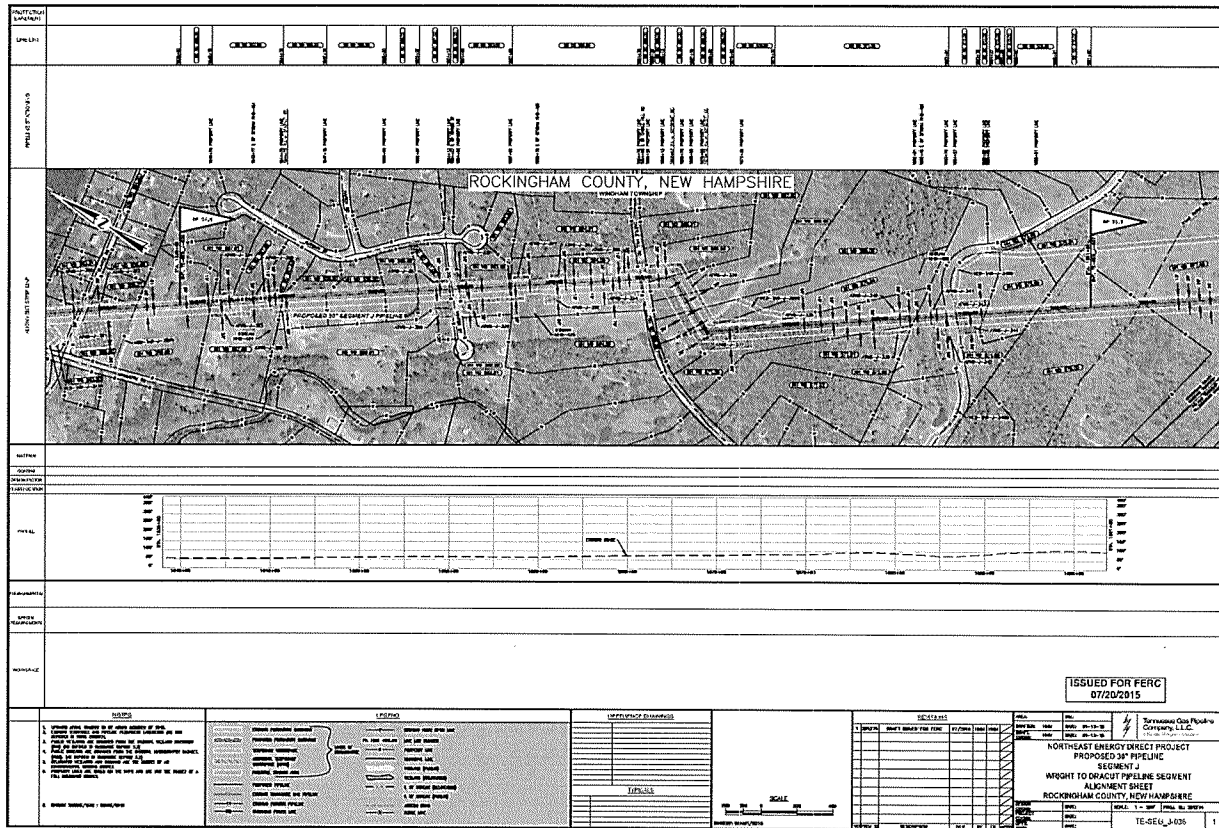
*To our elected officials, take note...this is what happens when an agency & rules are streamlined to work against the very citizens and environment it was designed to protect."*

Ms. Howland, the commissions approve will provide the justification for the project. A project that will effect generations of residents and ultimately provide little benefit for the residents. I urge you to reject the petition.

Sincerely;

Paul Sullivan

# Appendix A



# Appendix B

02538 P0512

Mar 22 4 02 PM '85  
Rockingham County  
Registry of Deeds  
10663

STATE OF NEW HAMPSHIRE  
TAX ON TRANSFER  
OF REAL PROPERTY  
COMMISSION  
630.00  
MAR 22 '85

KNOW ALL MEN BY THESE PRESENTS, That we, J. Kevin Callahan and Katherine A. Callahan, of North Andover, Essex County, Massachusetts, as husband and wife, as joint tenants with rights of survivorship

for consideration paid, grant to Paul J. Sullivan and Carey E. Sullivan, husband and wife, both of Autumn Street, Windham, County Of Rockingham, State of New Hampshire, as tenants by the entirety,

with warranty covenants

A certain parcel of land with the buildings thereon, situated in Windham, County of Rockingham, State of New Hampshire, and being shown as Lot #19-B-919 on a plan of land entitled "West Windham Subdivision, Sheet 1 of 3, Scale: 1" = 50', Owner: Hudco Development, Subdivider: Six-K Development Co., Date: March 28, 1979" said plan being recorded in the Rockingham County Registry of Deeds as Plan #D-10191 said lot #19-B-919 being more particularly bounded and described as follows:

Beginning at a point on the Westerly side of Autumn Street at the Northeasterly corner of Lot #19-B-920; thence South 87° 10' 46" West, 100.00 feet along the Northerly line of Lot #19-B-920 to a point; thence continuing South 77° 01' 23" West, 361.421 feet still along the Northerly line of Lot #19-B-920 to a point on the Northeasterly line of Lot #19-B-923 as shown on said plan; thence turning and running North 36° 23' 12" East, 101.980 feet along the Northeasterly line of Lot #19-B-923 to a point in the Southerly line of Lot #19-B-900 as shown on said plan; thence turning and running North 68° 40' 02" East, 165.327 feet along the Southerly line of Lot #19-B-900 to a point in "brook" as shown on said plan; thence turning and running North 00° 00' 00", 100.488 feet to a point along the Easterly line of Lot #19-B-900 as shown on said plan; thence continuing along the Easterly line of Lot #19-B-900 North 26° 11' 17" West, 135.956 feet to a point; thence running North 00° 58' 37" East, 145.515 feet to a point in a stone wall at the Northeasterly corner of Lot #19-B-900 as shown on said plan; thence turning and running South 38° 47' 19" East, 368.620 feet along the Southwesterly line of Lot #19-B-918 to a point at the Southwesterly corner of Lot #19-B-918 as shown on said plan; thence turning and running North 67° 30' 04" East, 102.487 feet to a point at the Westerly side of the cul-de-sac of Autumn Street; thence turning and running along said cul-de-sac in a general Southeasterly direction by a curve line the dimensions of which are as follows: A=57° 55' 18", L=80.874, R=80.00, to an iron pin set as shown on said plan; thence continuing along the cul-de-sac in a general Southerly direction by a curve line the dimensions of which are as follows: A=77° 36' 24", L=40.631, R=30.0 to a point; thence running along the Westerly side of Autumn Street, South 2° 49' 14" East, 99.779 feet to the point of beginning.

Subject to a Wetland and Watershed Protection District, containing 55,300 square feet, situated throughout the Westerly portion of said Lot as shown on said plan.

Subject to a twenty-five (25') foot drainage easement situated between said Wetland and Watershed Protection District and Lot #19-B-918.

Subject to a slope easement running along the Easterly side of said Lot #19-B-919 at Autumn Street as shown on said plan. Said lot containing a total of 102,341 square feet, more or less, according to said plan.

Being a portion of the premises conveyed to it by deed of Hudco Development Corp. recorded Rockingham County Registry of Deeds, Book 2386, Page 1708.

Being the same premises conveyed to J. Kevin Callahan and Katherine A. Callahan by deed of Six K's Development, Inc. recorded in Rockingham County Registry of Deeds at Book 2408, Page 574, Katherine A. Callahan, wife ~~xxxxxx~~ of said grantor, release to

and grantee s all rights of dower, curtesy and homestead and other interests therein.

Dated this 22nd day of March 1985.

STATE OF NEW HAMPSHIRE  
TAX ON TRANSFER  
OF REAL PROPERTY  
COMMISSION  
630.00  
MAR 22 '85

J. Kevin Callahan  
Katherine A. Callahan

State of New Hampshire

Rockingham

Personally appeared J. Kevin Callahan and Katherine A. Callahan,

known to me, or satisfactorily proven, to be the persons whose name s

subscribed to the foregoing instrument, and acknowledged that they executed the same

for the purposes therein contained.

Before me



(Signature) Notary Public

# Appendix C

