

Ashuelot River Local Advisory Committee

Washington Lempster Marlow Gilsum Sullivan Surry Keene Swanzey Winchester Hinsdale

July 30, 2018

Debra Howland
Executive Director and Secretary NH Public Utilities Commission
21 S. Fruit Street, Suite 10
Concord New Hampshire 03301

RE: DG 18-092 Liberty Utilities (Energy North Natural Gas) Corp.
Petition for a License to cross the Ashuelot River in Keene, NH

Dear Ms. Howland:

The Ashuelot River Local Advisory Committee (ARLAC) convened in 1994 with the acceptance of the Ashuelot River into the NH Rivers Management and Protection Program. Appointed by the Commissioner of the NH Department of Environmental Services (NHDES), ARLAC represents the ten corridor towns of the Ashuelot River and acts in an advisory capacity to NHDES. ARLAC has implemented a river monitoring program since 2001 with the assistance of the NH Volunteer River Assessment Program. We have established within the river corridor a management plan that proposes the protection of plentiful clean water, thriving riparian and aquatic habitat for wild plants and animals, and providing balance for continued development of land use and water uses, recreation, and other public needs.

We have reviewed the petition noted above as well as plans submitted to NHDES Shoreland Program, at our meetings of June 19 and July 17, 2018, and have had communications with representatives from Liberty Utilities. We have concerns regarding the possible contamination to the river and or/groundwater due to inadvertent release of fluids during the drilling process.

1. The soil borings provided are from those taken in 1964 for the building of the Winchester St. Bridge over the Ashuelot River. The report states " borings are for design and show conditions at boring points only and do not necessarily indicate nature of materials to be encountered during construction." We would like to see a more current and accurate evaluation of the substrate through which the proposed pipeline drilling will occur. Hydrogeological data should include stratigraphy, groundwater levels, upwellings, seeps and any ecological sensitivities that may be at risk. Perhaps the use of ground penetrating radar would provide more thorough information. Also included should be an accurate cross section of the river at the location of the drill path to include the stream bed elevations. The boring information provided by Liberty Utilities reflects exactly where the bridge is located and does not necessarily reflect the substratum in the proposed drill path beneath the river.

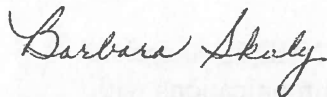
2. The Cheshire County Soil Survey shows the likely soil here to be Occum, a fine sandy loam with bedrock located at greater than 60 inches. Being a well-drained soil with rapid or very rapid permeability in the substratum, it provides a pathway for possible ground water contamination. The site also lies above a stratified drift aquifer with a transmissivity of $>1000 \text{ ft}^2/\text{day}$. If a frac out should occur during drilling, or the release of sediment laden water, there is a risk to the biota in the surface water as well. How were drilling pressures determined so to minimize possible frac out? We would like to see a contingency plan that would specify conditions that would mandate the cessation of drilling, the mitigation that would be implemented, and the conditions in which drilling would resume after mitigation.

We have been told the drilling water will be sucked from the sending pit via a vacuum truck and disposed of properly off-site, and ask where that site would be.

3. Estimated seasonal high water table is at a depth of 4-6 feet, what provision is there to manage intrusion into the water table during drilling? Plans should also define best management practices to avoid contamination from petroleum products at the site of drilling.
4. The proposed plan does not provide for environmental oversight during construction. Given the proximity to the river and groundwater, we would like to see a provision in the plans for an environmental monitor with an understanding of the potential risks, and the ability to manage situations that may cause environmental damage and provide advice during an emergency.

Thank you for the opportunity to comment on this proposal.

Respectfully submitted,



Barbara Skuly
Chairman

Cc: Andrew Mills, Liberty Utilities
Tracie Sales, NHRMPP
Keene Conservation Commission
Keene City Council