

STATE OF NEW HAMPSHIRE

Inter-Department Communication

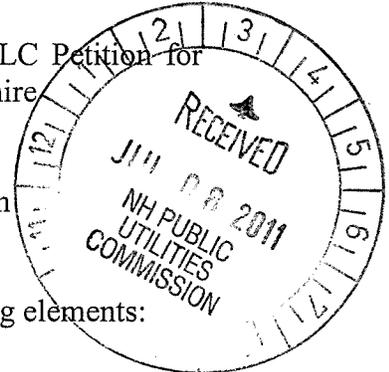
DATE: July 08, 2011

AT (OFFICE): NHPUC

FROM: Randy Knepper, Safety Director *RSK*

SUBJECT: Docket No. DG 11-138 Gorham Paper and Tissue LLC Petition for
License to Cross Public Waters in Berlin, New Hampshire

TO: Debra Howland, Executive Director
Steve Frink, Assistant Director, Gas and Water Division
Alex Speidel, Staff Attorney



The Safety Division review of the above petition consisted of the following elements:

- Petition contents and history
- Review of land ownership on each side of the river crossing.
- Review of CFR Part 192 requirements as described in Puc 500 rules
- Review of public need and public impact, including applicability of other State regulations
- Conclusions and Recommendations

1. Petition contents and history.

On June 13, 2011, Gorham Paper and Tissue, LLC (GPT), filed a petition, pursuant to RSA 371:17 and RSA 371:20, to construct and maintain a single natural gas pipeline over and across the Androscoggin River in the City of Berlin to provide service to GPT's Gorham Paper Mill. GPT proposes to locate the natural gas pipeline on an abandoned railway bridge owned by GPT in order to supply natural gas used in the papermaking process. GPT states that the proposed construction will help enhance the economic viability of the Gorham Paper Mill without imposing substantial impacts on the public use and -enjoyment of the Androscoggin River.

On June 30, 2011, GPT filed a write-up of the proposed scope of work for the repairs needed for the bridge prior to the installation of the natural gas pipeline. It is Staff's understanding that the existing railroad bridge will be retrofitted and repaired so as to be structurally sound prior to construction of the natural gas pipeline.

On July 5, 2011, GPT supplemented its original submission with a site plan shown on Sheet C203 with a plan view, without a profile of detail of the river crossing. In addition, a site plan was submitted for a nearby Metering and

Regulating Station that is proposed for siting adjacent and upstream of the river crossing.

2. Review of the proposed crossing of the Androscoggin River, Berlin.

The proposed pipeline will transport natural gas at a maximum flow rate of approximately 6,850 Mcf/day with an operating pressure ranging from 30 psig to 75 psig. The pipeline will consist of 6 inch nominal diameter Schedule 40 steel with corrosion protective coating. The type, grade of steel, and applied coating material were not specified in the petition.

Thermal expansion of the pipeline will be compensated by a bellows fitting within the pipeline and the pipeline will be isolated electrically from the railroad bridge using insulated roller supports.

The bridge itself will undergo repairs to make it structurally sound to carry the weight of up to two additional gas pipelines (including the proposed pipeline), and the bridge will have fencing at each end to limit access to the general public.

GPT has provided sufficient documentation to demonstrate that all easements are in place that allow for the gas pipeline to be built on the eastern shore of the Androscoggin River. The parcel on the western shore of the Androscoggin River is currently owned by GPT.

GPT has also represented that the proposed pipeline crossing will not interfere with public rights to use and enjoyment of the Androscoggin River. As planned, the pipeline will not extend below the existing bridge, thereby enabling recreational river users to pass below the bridge without hindrance.

3. Review of safety requirements as described in Puc 500.

The N.H. Code of Administrative Rules Puc 506.01 Pipeline Safety Standards:

(a) All utilities shall comply with those pipeline safety regulations established by the United States Department of Transportation which are set forth in 49 C.F.R. Parts 191, 192, 193, 198 and 199, including future amendments thereto.

(b) Where Puc 500 or Puc 800 establishes more stringent requirements than those pipeline safety regulations adopted pursuant to (a) above, the more stringent requirement set forth in Puc 500 or Puc 800 shall apply.

GPT's petition does not explicitly state that the administrative rules of Puc 500 will be met, but does provide engineering details that show overall compliance.

The Safety Division review of the petition and attachments submitted to date found the proposed attachments to be in conformance with the applicable sections of the Puc 500 and CFR Part 192. It should be noted that no detailed

drawings showing elevations or components of the pipeline were supplied to the Safety Division.

4. **Recommendations and Conclusions.**

The Safety Division recommends approval of GPT's petition by Order *Nisi* under RSA 371:17 and RSA 371:20 to the Commission with the following conditions:

- a. Staff recommends that the approval be limited to the to the GPT natural gas pipeline under consideration in this docket. A potential future landfill gas line that was originally petitioned for by the Androscoggin Valley Regional Refuse Disposal District in DG 10-244 is projected to be resubmitted for the same bridge crossing once final design details will be known.
- b. Staff recommends that, ten days prior to construction commencing for the bridge portion of the overall project, a detailed set of plans and profile be submitted to the Safety Division for its review.
- c. Staff recommends that the grade and type of steel of the natural gas pipeline be submitted to the Commission. The type of cathodic protective coating shall be submitted including the mil thickness of the coating. Staff recommends that a ultraviolet resistant coating be selected and technical data sheets be supplied to the Commission that verify the adequacy of protection, including for those coatings applied to welded joints.
- d. Shut-off valves must be installed both upstream and downstream of the bridge crossing to provide adequate shutoff capability. The upstream valve may be located at the outlet side of the M&R station which is in vicinity of the bridge crossing;
- e. Staff recommends that the bridge be visually inspected and leak surveyed at a minimum 3 times per year in accordance with Puc 508.04(f) and accessible records kept on file subject to any inspections of the Safety Division.
- f. Pursuant to Puc 506.01 GPT shall be subject to the Safety Division's monitoring with inspection of the construction, installation, operation and maintenance of the natural gas pipeline on the bridge crossing.
- g. GPT shall operate and maintain the crossing in conformance with the latest version of the Puc 500 rules and latest CFR Part 192 amendment. All future alterations to the crossing that may impact the public shall conform to the Puc 500 rules as well as CFR Part 192 latest amendment that are in place at time of submittal of the alteration.

If these engineering conditions are met, the Safety Division is of the opinion that the proposed natural gas pipeline will meet all current safety standards; safe ongoing operation is an inherent component of the RSA 371:20 public rights standard.