

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: December 15, 2014**AT (OFFICE):** NHPUC

NHPUC 15DEC14PM4:14

FROM: Randy Knepper, Safety Director *RSK*

SUBJECT: Docket No. DG 14-241; Northern Utilities' Petition for License to Cross Public Waters at the Cocheco River in Dover, New Hampshire

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

The Safety Division's 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 49 CFR Part 192 requirements
- Review of public need and public impact, including applicability of other State regulations
- Conclusions and Recommendations

1. Petition contents and history.

On September 22, 2014, Northern Utilities, Inc. (NU), 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 Cocheco River at a pedestrian bridge located off of Covered Bridge Road in Dover, New Hampshire. The proposed pipeline will allow NU to provide natural gas distribution service to ten Strafford County-owned buildings along County Farm Road in Dover.

The proposed pipeline crossing will be constructed on a pedestrian bridge owned and maintained by an unincorporated non-profit association known as the Dover Landfill Work Settling Defendants. The bridge owners operate a sewer pipeline attached to the bridge that connects the former Dover Municipal Landfill to the City of Dover sewage treatment plant. The proposed gas pipeline is a distribution main that will be located on each end of the pedestrian bridge within easements owned by the City of Dover and Strafford County.

NU proposes the construction of an 8-inch nominal diameter pipeline attached to the bottom of the pedestrian bridge over the Cocheco River consistent with the pipeline design attached to the petition as Attachment A. The petition specifies that the exposed portion of the pipeline will consist of ASTM A-53

Grade B coated steel with a wall thickness of 0.25 inch. The underground portion of the proposed pipeline approaching the bridge will consist of 8-inch diameter SDR-11 Driscoplex 8300 high density polyethylene (HDPE) pipe with isolation valves located adjacent to each side of the bridge crossing. The maximum allowable operating pressure of the pipeline will be 88 pounds per square inch gage (psig) and the crossing will be approximately 140 feet in length. The steel pipeline coating will consist of Fusion Bonded Epoxy applied as an external layer. The proposed steel pipeline design includes two expansion joints with roller supports to accommodate pipeline movement.

The Cocheco River in the vicinity of the proposed water crossing has been designated as a "Public Water and that this segment of the Cocheco River is a "Designated River" which is required to be managed in accordance with RSA 483. A copy of the petition was provided to the Cocheco River Local Advisory Committee. The DES official list of public waters applicable to RSA 371: 17 is available at:

<http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/olpw.pdf>

The Safety Division researched and found sufficient documentation to demonstrate that all easements are in place to allow for the gas pipeline to be constructed on the pedestrian bridge over the Cocheco River as well as on the northern and southern embankments. The parcel on northern embankment is owned by the City of Dover and the parcel on the southern embankment is owned by Strafford County.

NU also represented that the proposed pipeline crossing will not interfere with public rights to use and enjoyment of the Cocheco River.

2. Review of safety requirements as described in 49 CFR Part 192.

NU's petition does not explicitly state that the federal rules of 49 CFR Part 192 will be met, but does provide engineering details regarding material and selection of applied coatings that comply with 49 CFR Part 192. Advisory Bulletins regarding incorporations of flooding impacts may also be applicable.

The Safety Division's review of the petition and attachments submitted to date found that the proposed attachments conform with the applicable sections of 49 CFR Part 192.

3. Review of public need and public impact, including applicability of other State regulations.

On September 23, 2014 the County Administer submitted a letter of support for the project on behalf of the Commissioners of the Strafford County Rest Home.

On Oct 31, 2014 NU submitted a copy of a letter of support for the crossing from the Engineering Division of the Community Services Department of the City of Dover.

NU states within the petition that the crossing will allow natural gas service to be provided to the County facilities as well as allow for any future extensions of gas service to other potential customers along County Farm Road in Dover.

NU states that a license for the crossing should be granted without “substantially affecting public rights in affected waters” and will not impede foot traffic on the pedestrian bridge nor potential marine traffic on the Coheco River.

In addition, Puc 508.04 (f) requires the pipeline to be leak surveyed at least 3 times annually. Puc 506.01(e) and (f) require visual inspection of welds of the steel pipeline and nondestructive testing of the welds of the pipeline.

4. Recommendations and Conclusions.

Based on information provided in NU’s petition, the Safety Division recommends approval of NU’s petition under RSA 371:17 and RSA 371:20 with the following conditions:

- i. Approval be limited to the NU natural gas pipeline under consideration in this docket.
- ii. NU should be directed to operate and maintain the crossing in conformance with the latest 49 CFR Part 192 amendment and Puc 500 rules.
- iii. All future alterations to the crossing that may impact the public shall conform to the latest 49 CFR Part 192 amendments and Puc 500 rules that are in effect when the alteration is submitted for approval.

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.

SERVICE LIST - EMAIL ADDRESSES - DOCKET RELATED

Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with:**

DEBRA A HOWLAND
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NHPUC
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- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.**
- c) Serve a written copy on each person on the service list not able to receive electronic mail.**