



## Questions for Millennium Pipeline Company on the proposed Eastern System Upgrade Project

### Health impacts/track record/accountability:

Millennium has asserted in the press that transmission compressors do not release toxins and that any emissions that are released are far below federal standards. And yet, Millennium's 2012 permit applications for the Hancock compressor station (also a transmission compressor station along the Millennium pipeline) listed NOX, CO, VOCs, SO<sub>2</sub>, O<sub>3</sub>, CO<sub>2</sub>, particulate matter PM<sub>10</sub> and PM<sub>2.5</sub>, methane, propane, hexane, and Hazardous Air Pollutants (HAPs), including formaldehyde as being among the known emissions from the compressor station. Of these, the company's own modeled emissions exceeded the EPA's significant impact levels (SILs) for nitrogen dioxide, sulfur dioxide, and fine particulate matter PM<sub>2.5</sub> and PM<sub>10</sub>. How do you reconcile your press statements with your Hancock Compressor permit application?

The Town of Minisink is the subject of a public health impacts study because of chronic illness reported in the vicinity of, and as the apparent result of, Millennium's Minixink Compressor station, also a transmission compressor station. Families near the Hancock compressor have been evacuated because of dangerous emergency venting events.

- How would the Highland Compressor differ from these other two Millennium Compressors?
- What are you doing to reduce emissions and health impacts as compared to those reported and documented around your other compressors?

Studies have linked the toxins emitted by transmission compressor stations to chronic respiratory issues, cardiovascular issues and heart attacks, neurological issues, cancer, and reproductive and development toxicity. The health risks that emissions and noise pose are even greater for vulnerable populations, such as children and pregnant women. Eldred high school is just four miles away from the proposed Highland Compressor. Also nearby are camps for kids, including Camp Simcha, whose mission is to serve children with cancer and other blood disorders. Overall, Sullivan County is currently ranked 61st out of 62 New York State counties with regard to the overall health of its residents. Has the company thoroughly assessed the risks of exposing these vulnerable populations, including children with compromised immune systems, to the impacts of pollution emitted by the compressor station so close by?

- If not why not?
- If yes, will you provide all review information and data?

The proposed compressor station proposed for Highland would be within 25 miles of two other compressor stations; in addition Millennium is proposing to construct a second compressor in Hancock. Has the company done dispersion modeling analysis in order to assess the cumulative impacts of adding 2 new

compressors to this region and in such close proximity to the already existing Minisink and Hancock Compressor Stations?

Health impact studies have indicated that compressor emissions are far worse than what is estimated by pipeline companies in air permit applications. The health impact study conducted around the Minisink compressor station linked episodic emissions to respiratory problems, neurological problems, and dermatological problems.

- Has Millennium done anything to address the major health complaints of residents around the Minisink compressor station?
- Has the company taken any actual measurements of emissions from any of their existing compressor stations and if so will you release that data to the public?
- Would Millennium be willing to fund an independent third party researcher to collect actual emission samples from their compressor stations over time and make this data publicly available?
- In the event that actual emissions are found to be above any relevant standards, would the company take actions to get all emissions within regulations?
- How would the company compensate nearby residents for the health impacts and loss of property and/or property value in this case?
- How will Millennium compensate Highland and other Sullivan County and other nearby residents who suffer health impacts or decreased property values as a result of the proposed new compressor?

Compressor stations emit noise and vibrations continuously, day and night. The noise emitted is often above allowable standards, especially during regular “blowdowns”. Chronic exposure to low frequency noise can lead to Vibroacoustic Disease, which causes a range of serious health impacts—including thickening of cardiovascular structures, psychiatric disturbances, and infections. Low frequency noise can travel 5 miles.

- What will Millennium do to ensure nearby residents are not affected by noise emissions during regular operations and during blowdown events?

How will Millennium alert nearby residents of blowdown events? How much prior warning will be given?

### **Safety:**

Will Millennium create evacuation plans for our Township? Will you regularly, at least annually, hold public meetings to alert everyone and train everyone in these evacuation plans?

Does Millennium have a plan to prepare our first responders for gas related accidents? Who will pay for that training and any needed emergency response actions?

How wide is the blast zone of a compressor station of this size in the case of an explosion?

- What will be the Potential Impact Radius (PIR) if an explosion were to occur?
- Will the company calculate the High Consequence Areas (HCA) surrounding the compressor station and along the entire pipeline path so the public can see what might be vaporized or burned if an explosion were to occur?
- What is the potential and radius of secondary fires beyond the PIR?

How far does a home have to be from the compressor to be safe if there were an explosion?

Would you feel safe if your family and kids lived that close?

## **Economic impacts:**

Who pays for the damages and clean up *when* something goes wrong?

The stigma of compressor stations would significantly depreciate the values of properties nearby. Are you planning on compensating homeowners who are impacted by such an economic loss?

Construction of compressor stations can cause millions of dollars in damages to town roads and infrastructure. In 2008, the Town of Cohecton, NY accused Millennium of leaving behind \$1 million in damages to county roads after their 2008 pipeline expansion project—which Millennium denied. Will you commit to repairing all roads and affected infrastructure to their existing condition or better?

Toxic air pollution from Millennium's Minisink compressor station has forced homeowners to abandon their home. Would you compensate nearby homeowners who are forced to abandon their homes because they do not feel safe or because they develop chronic illnesses associated with compressor emissions after the compressor station is built?

In the event of a fire, explosion, or other incident at the Highland Compressor, The Town of Highland will be forced to rely on volunteer first responders and the town must bear the associated costs of emergency training and special equipment. How does the pipeline company plan to compensate the township for increases in the taxpayer burden for needed improvements in emergency preparedness?

Property values surrounding other compressor stations have significantly decreased since the compressors were built. If the Highland Compressor is allowed to be constructed and operated, the tax base of the Town of Highland could be negatively impacted due to the likelihood of declining property values, and the inability to promote future development in the surrounding area. How would the company compensate the town for this ongoing loss of revenue?

Regarding the employment opportunities asserted, what percentage of workers will be local?

- Would these be union jobs?
- Given our understanding that much of the work requires specialized skills, and many of these specialists are from regions such as TX, what percentage of workers will be from out-of-state?

## **Need/justification:**

FERC and industry guidelines state that compressors are spaced 40-100 miles apart. The Hancock and Minisink compressor stations are already 50 miles apart. The Highland compressor station would be only 25 miles away from each of these existing stations. Why are compressor stations now needed so close together on the Millennium Pipeline? Is this project part of an additional future upgrade? If not, would you be willing to commit this to writing?

What percentage of the gas carried by the Millennium pipeline is being exported? We know that there is a big increase in efforts to export gas, including building new export facilities, because you can sell the gas for a higher price overseas, so are you really not going to export at any point in the future?

- If the answer is none, will you commit in writing that none of this gas will ever be exported overseas and that if that were to happen will you compensate all property owners along the route with a percentage of your increased profits from doing so?
- If the answer is some then how much and from what facility will it be exported?

## **Community considerations:**

Sullivan County is reported by the EPA to have a population close to 75 percent that is low income (less than two times the national poverty level), close to 60 percent over the age of 64, close to 50 percent below the age of 5 years old, and 50 percent minority population, all of which combined are indicators of an environmental justice, sensitive and disadvantaged community. The EPA defines environmental justice to mean that all people, regardless of race, color, origin, or income, receive fair treatment and equal environmental protection, and have the opportunity for meaningful involvement in decisions that will affect the environment and/or health of their community. How, exactly, is Millennium ensuring meaningful involvement of all community members in the decision over this compressor station, which would affect the environment and health of the community?

What authority over your pipeline construction and location decisions will you grant to our local town council/supervisors/commissioners?

Are you planning on executing eminent domain?

The Towns of Highland, Tusten, and Bethel, as well as the Eldred Central School District, have all passed resolutions in opposition to this compressor station. How can the use of eminent domain be justified for this project when there is such strong and clear local opposition?

We understand that in the FERC process, landowners have the right to await the outcome of the full FERC approval process, including:

- project pre-filing with FERC
- filing application materials for FERC review
- becoming intervenors in the process
- issuance of an Environmental Assessment and/or Environmental Impact Statement
- comment periods associated with all such documents
- and the release of FERC approval of the project

before landowners legally need to sign easement agreements. Will you abide by this legal process and refrain from telling landowners they need to sign easements before this process is complete?

Will you work with landowners to achieve the minimum impact to their quality of life by addressing landowner issues by meeting with landowners as groups who are collectively impacted, and not limiting your communications to individual meetings?

What percentage of landowners have granted survey permission?

## **Environmental impacts:**

Given all of the reports of water pollution, air pollution, deforestation, and other environmental harms resulting from shale gas extraction how can you continue to assert that the gas you are bringing through your pipeline is clean and safe?

How can you promote this project as a clean energy project, when methane leaks from pipelines and compressor stations are known to be a major contributor to climate change?

How can you justify the Neversink River crossing—which cuts through sensitive habitat of the dwarf wedge mussel, an endangered species?

The Town of Highland has been a participating member since 1990 of the Upper Delaware Council an organization that works in partnership with the National Park Service to oversee administration of the River Management Plan for the Upper Delaware Scenic and Recreational River, which the United States Congress designated in 1978 as a unit of the National Wild and Scenic rivers System in recognition of its outstandingly remarkable values. How can you justify risking this important and valuable designation through the increased industrialization and pollution that comes with the continued pipeline “upgrades”?

Will there be the filters and condensate tanks at the proposed Highland compressor station?

- What will you do with hazardous wastes?
- What will you do in the case of spill?
- Would you be willing to test the contents of the compressor station condensate and report it the state and federal regulators, so that the community can be informed to the contents of the chemicals that are being evaporated into their air and potentially spilled in their waterways?

### **Future Impacts:**

If this upgrade project were to go through would you target this right of way for future additional upgrades, including any compressor stations, pipeline loops, or additional infrastructure? If you say no tonight are you willing to sign legal documentation to that affect?

What happens in 20 or so years when the gas is gone and your pipeline is no longer in use, will you commit to full removal and restoration of our land?

### **General:**

What type of compressor are you planning on installing in Highland and in Hancock? Is it a gas turbine compressor?

- If yes, why have you chosen to use a heavier polluting option over an electric-powered compressor?

Many analysts are not bullish on the gas market, believing it’s a bubble and production estimates are overstated. Should a market bubble burst, how does Millennium plan on having sufficient resources to maintain the safety and integrity of the pipeline?

### **General Pipeline/ROW impacts: (In regards to the new pipe included in the Neversink Loop)**

How was this location—which includes at least 10 stream crossings, 4 wetland impact areas, and a river crossing at an Environmentally Sensitive Area—chosen for the additional pipeline loop? What alternatives were considered?

I’ve read that land owners will have to pay the increased insurance on land that you run a pipeline through? Can you provide documentation showing us how much we can expect in these kinds of costs? Will you provide property owners with funds necessary to pay the increased insurance rates they will incur?

What happens in 20 or so years when the gas is gone and your pipeline is no longer in use, will you commit to full removal and restoration of our land?

What is the right-of way width you are proposing? Assuming it is the standard 100 to 200 feet, are you willing to use construction practices we know to exist and have in fact been used in nearby New Jersey projects to narrow that right of way disturbance to closer to 50 feet?

Will you commit to leaving forested and/or vegetated landscapes uncut for purposes of aerial right-of way surveillance? We are able to provide substantiation of avoiding clearing a right-of way simply for purposes of maintenance surveys is possible.

Will you commit to supporting right-of way maintenance that avoids all use of chemicals, restores native ecosystems, and allows for a closed canopy in forested areas cut by the right of way?

Will you commit to conducting invasive species management along the right-of way for at least 10 years, beyond the minimum required by FERC?

Will you commit to development practices that avoid soil compaction to the greatest degree possible, for example those practices recommended in the Delaware Riverkeeper Network report “Achieving Higher Quality Restoration on Pipeline Rights of Way” by expert Leslie Sauer?

Will you commit to using Horizontal Drilling to cut under all waterways, wetlands and forests so as to minimize the harm resulting from traditional construction practices that mechanically cut through them creating maximum damage? How will you ensure this drilling will not result in Bentonite spills and drilling muds going into the drilled waterway as happened in the Upper Delaware when the Northeast Upgrade Pipeline Project was drilled under the River?

Will you commit to ensuring a 300 foot vegetated buffer along all waterways after construction to ensure maximum habitat and water quality protection?

Will you plant larger diameter trees and shrubs to encourage faster restoration and avoid mortality to deer browse?

Beyond larger trees, what practices will you use to prevent deer destruction? Will you commit to deer fencing when requested by the property owner?

How many waterways are in the path of this project?

How many wetlands are in the path of this project?

How many acres of public lands are you targeting with this project?

Will there be any blasting as part of this project?

In your General Route Evaluation and Assessment process, are you contacting the county planning commissions to determine what local impacts you may not be aware of? If you have not yet done so when do you plan to do so?

Farmers frequently use crop productivity on agricultural lands underlain by gas pipelines. Other businesses lose business and profits due to pipelines in a variety of ways – e.g. a maple syrup producer lost profits because 80% of their maple trees were cut to accommodate a pipeline crossing. Will you compensate businesses and farmers for any lost business or profits due to installation of the pipeline?

Will you put an escrow account in place to help property owners deal with harms they suffer as a result of this pipeline?