

**STATE OF VERMONT
PUBLIC SERVICE BOARD**

Docket No. 7970

Petition of Vermont Gas Systems, Inc. for a certificate of public good, pursuant to 30 V.S.A. §248, authorizing the construction of the “Addison Natural Gas Project” consisting of approximately 43 miles of new “natural” gas transmission pipeline in Chittenden and Addison Counties, approximately 5 miles of new distribution mainlines in Addison County, together with three new gate stations in Williston, New Haven and Middlebury, Vermont

DISCOVERY REQUESTS TO
AGENCY OF NATURAL RESOURCES
BY
NATHAN B PALMER
of
Monkton, Vermont
June 20, 2013

INTERROGATORIES AND REQUESTS TO PRODUCE

Robert Popp

1. On page 7, lines 9-15, of your prefiled testimony, you list seven state threatened plants (in 9 locations) and on page 9, lines 6-12 you list 7 uncommon to very rare plants (some in multiple locations) that are located in the project area. This seems like a lot to me. Is this an uncommonly high number of plants to be impacted in a project of this scope and magnitude or is it about normal?
2. In your opinion, would the impact to R,T,E plants be more or less if the pipeline was sited along the

VELCO right of way in its entirety? And how would the VELCO right of way compare (in reference to number of R,T,E plants) to a route alongside of Route 7?

3. Are there any areas of R,T,E plants between VELCO poles 180 through 190 on the VELCO right of way?

4. In Q 23, you are asked “**Do you have any other concerns regarding potential impacts from the Project?**” You list several concerns and then talk about opening up of corridors for invasive species to infest otherwise inaccessible areas. On page 13, lines 12-14 you state, “**VT Gas has not addressed this concern which should be covered in an Invasive Species Management Plan which the Agency has requested from VT Gas and has as yet not received.**”

When did the Agency request this information? How will impacts be assessed without baseline data?

Will you require this data before issuing permits?

Alan Quackenbush,

1. On page 3 lines 16-19 **Q. Will the project have any impact on the wetlands or buffers? A. Yes, impacts will result primarily from trenching and clearing of vegetation. Most of the trenching impacts will be temporary, if the soil layers can be removed and replaced in order, and if the hydrology of the wetland does not change. If the hydrology changes or the soil layers are not removed and replaced in order, these impacts will be permanent.**”

I take this to mean that the “water balance” (as hydrology is defined in Wikipedia), could be changed by this trenching? What other circumstances would change the “water balance” or hydrology of the wetlands?

2. Mr Quackenbush mentions he will need the location of blasting activities to determine potential impacts to wetland hydrology. Has the Agency gotten any maps or other information from the Petitioner as to where the blasting will occur as of yet? Will ANR require this information to be

submitted before any permits are issued?

3. Originally, VGS had 5 routes they were considering for this pipeline. They settled on Number 5, the one through Monkton. (lucky us) I am assuming this original route through Monkton (now known as 5a) was the “least environmentally damaging practicable alternative” at the time. Then, when the townspeople of Monkton raised a ruckus, and the route was shifted off the town roads and mostly onto the VELCO right of way, (except where it deviates through the middle of our farm) and Route 5a became Route 5b, (see Q. ANR:VGS.2-8, 2-35, 2-43,2-45,2.49) it seemed like you were not really too happy about that because it sited the pipeline through more wetlands and environmentally sensitive areas.

What I would like to know is, what made you decide that Route 5b is now the “least environmentally damaging practicable alternative” compared to the other four original routes...specifically the one down the Route 7 corridor? Please provide any correspondence, research, field notes, permit applications or any other documentation that confirms that ANR agrees that Route 5b is less environmentally damaging than any of the other original routes previously considered.

Jeff Merrell

1. Page 6, lines 3-5 In your examination of GHG emissions predictions by Eileen Simollardes, (EMS-1) you conclude that her estimated prediction for GHG reduction benefits **“provides no information that would enable the reader to understand the level of uncertainty present in various inputs and assumptions used to generate the GHG emissions benefit results”**

Then, on page 9, lines 9-15, you say, **“Absent a life-cycle analysis, it would only be possible to say that at the burner tip, combustion of natural gas emits a smaller mass of greenhouse gases than an energy equivalent amount of fuel oil or propane. Depending on methane emissions that occur “upstream” in the natural gas life cycle, this may or may not accurately reflect the comparative**

difference in greenhouse gas emissions between natural gas and other fuels (i.e., if fugitive methane leaks during natural gas productions are large, the greenhouse gas benefits attributable to the project would be reduced, or could even be negated.)

So, can it be assumed from your testimony that VGS has been exaggerating the greenhouse gas emissions savings this project will produce and that Ms Simollardes' exhibit EMS-1 should have no bearing on the decision the Board makes regarding this project?

2. This 248 process has been focused on the economics and the environmental (GHG) consequences of this project, but no one has broached the subject of the process of extracting the “natural” gas that will be carried and sold through this pipeline. What is your opinion on the true cost to the environment that hydraulic fracturing causes and how should these costs affect the Board's decision on whether or not this pipeline is in the “public good”?

3. What impact do you think the added usage of “natural” gas in Vermont will have on the water and air quality in the areas where it is extracted?

J Calvi

1. On page 9, lines 1-5, you list the 12 major watersheds that the project area crosses. Are marshes and swamps not considered watersheds and is that why they are not on the list? And what area of the Lake Champlain basin will be crossed during Phase 1 of this project?

2. During the process of horizontal directional drilling, copious amounts of water mixed with bentonite are used during the drilling process. Will the water and bentonite residue be removed or discharged on site? How is it collected and contained?