



Office of the
CONSERVATION COMMISSION

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September 27, 2014

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

RE: Tennessee Gas Pipeline Company, L.L.C., Docket No. PF14-22-000
Request to Use Pre-filing Procedures for Proposed Northeast Energy Direct Project

Dear Secretary Bose:

Now that the Tennessee Gas Pipeline Company has pre-filed, we will be sharing our many concerns with FERC over the next few months. In response to their pre-filing, we join others in stating that it is misleading at best for Tennessee Gas to use 1988 USGS topo maps when MassGIS maps are current and readily available. Substantial development has taken place in the past almost 30 years since these maps were issued. How can FERC make accurate decisions without a clear understanding of the magnitude of the impact in this area without 21st century maps?

The pre-filing request letter presents glowing predictions of meeting the energy needs of the New England region on the one hand, and lowers expectations on the other. It states that "The New England region as a whole stands to benefit from the NED Project as it will enable New England to sustain its electric grid and lower energy costs..." Yet in just the next paragraph, we read that "Additional natural gas infrastructure **may** benefit the region in the form of lower energy costs..."

The truth comes out in just the next paragraph. Quoting their industry's professional organization, the International Natural Gas Association of America Foundation, funded by pipeline operators and their contractors, in the article North American Midstream Infrastructure through 2035: Capitalizing on Our Energy Abundance, **Reaping the Benefits**, it is stated that:

*The unprecedented pace of natural gas and crude oil development in North America has turned the U.S. into the world's largest natural gas producer. As a result, it has become possible to envision a world in which America, once heavily reliant upon foreign crude oil, becomes a net oil and liquefied natural gas (LNG) exporter within a couple of decades. However, getting there will require a vast investment in midstream infrastructure, according to a study released in April by the Interstate Natural Gas Association of America (INGAA) Foundation. America's Natural Gas Alliance was a joint sponsor of the infrastructure study. The study, North American Midstream Infrastructure through 2035: Capitalizing on Our Energy Abundance, found that companies will need to invest \$641 billion over the next two decades in pipelines, processing plants, pumps and other infrastructure **to keep up with the natural gas, crude oil and natural gas liquids (NGL) flowing from U.S. fields.**"*

Clearly the proposed Northeast Direct Project is about keeping up with production, not meeting demand or lowering energy costs in New England. In fact, their footnote reference to the article failed to include the rest of the title, “REAPING THE BENEFITS”. This is the article they chose to quote in their pre-filing letter! There is so much gas that drillers have simply stopped drilling some fields, so new pipelines are needed to prop up the price of gas. Yet at what expense? Homeowners with their property as their only asset? The environment that the people of Townsend have spent generations protecting?

Townsend, just advised that it is the proposed site of one of two large compressor stations in Massachusetts, will NOT REAP THE BENEFITS of this pipeline. The environmental impacts alone will be catastrophic for Townsend. The town voted unanimously in a Special Town Meeting this July to oppose the pipeline. Townsend’s residents have long recognized what they have, and know that it is worth protecting. Below is a list of laws that have been approved by the residents of Townsend:

Squannacook and Nissitissit Rivers Sanctuary Act, passed in 1975
Townsend Wetlands Bylaw, passed in 1983
Townsend Wetlands Bylaw Regulations, passed in 1989
Squannassit Area of Critical Environmental Concern, passed in 2002
Illicit Discharges and Stormwater Bylaws, passed in 2007
Almost all of the waters and wetlands are designated Outstanding Resource Waters

Townsend has partnered with the MA Division of Fisheries and Wildlife to protect large tracts of land for wildlife refuges, and partnered with the MA Executive Office of Energy and Environmental Affairs in protecting a large tract of land under the jurisdiction of the Conservation Commission, through which this proposed pipeline would travel. Most of these areas are significant habitat for rare and endangered species.

MA EOEEA Secretary Bartlett proposes in her letter to FERC that it is unclear whether the capacity of this pipeline is needed. The Commonwealth is conducting its own study to determine whether additional infrastructure is needed. We respectfully request that you delay the issuing of a pre-filing notice until that needs study has been completed, or at least current maps presenting an accurate view of the impact of this proposed pipeline are presented.

Thank you very much for your consideration of our concerns.

Sincerely,
Townsend Conservation Commission

Cc: Senator Edward Markey
Senator Elizabeth Warren
Representative Niki Tsongas
Governor Deval Patrick
Maeve Vallely-Bartlett, Secretary of Energy and Environmental Affairs
Townsend Board of Selectmen