

October 5, 2016

Ms. Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First St. N.E.
Washington, DC 20426

Re: Algonquin Gas Transmission LLC, Docket CP14-96-000

Dear Secretary Bose,

As Spectra/Algonquin rushes to complete the AIM pipeline project to be operational by November 1st, the public is alarmed by numerous mishaps as the company attempts to pull the giant 42" diameter string of welded pipe segments through a reamed bore hole under the Hudson River. Spectra's attempt to pull the pipe under the river using the controversial horizontal directional drilling (HDD) process failed in late August. The company was issued a "serious violation" by Federal Energy Regulatory Commission (FERC) after losing a drill stem in a wetland and proceeding with work there without approval. A three-state coalition [submitted a letter to FERC](#) on September 22nd outlining our concerns.

While preparing to once again attempt to drag the pipeline under the river using HDD, Spectra/Algonquin ran into another problem in the same location when re-reaming the hole. Alarmingly, the company was granted a variance by FERC allowing the bore hole to be reinforced with rocks in order to prevent it from caving in. We believe that all involved agencies should be advised of the specific details of the variance requested by Spectra/Algonquin and FERC's rationale for approving the variance. FERC made a unilateral decision to grant a variance without consulting with the US Army Corps of Engineers, NYS Department of Environmental Conservation, US Fish & Wildlife, US EPA, NY Department of State and other Involved Agencies in this most sensitive location after Spectra/Algonquin failed to cross the river the first time.

Furthermore, we are very concerned about Spectra/Algonquin's statements to FERC that "repairs" were being made to the damaged pipe sections including replacements and re-welding. When the pipe was stuck, pneumatic hammers were used to remove the string of pipeline until it was eventually extracted. In the weekly report #69 for September 10-16, Spectra/Algonquin stated,

"HDD reaming activities are in-progress along the drill path. Pullback of the HDD pipe under the Hudson River is scheduled to begin mid-October. After a field inspection by New York State Department of Public Service on 8/30/16-9/1/16 and continued evaluation by Algonquin and its contractor, the decision was made to replace 3,100 feet of the pipe to be used for the pullback at the Hudson River HDD. NYSDPS was notified of this plan to replace 3,100 feet of pipe."

The crossing is 4,900 feet in total. Why is some of the damaged pipe being used in this high consequence area, adjacent to Indian Point Nuclear Power Plant? Where is the accounting of

which sections have been damaged, what types of damage were done, what repairs were conducted, and what testing has been done to ensure the integrity of the sections and repairs?”

FERC and the involved agencies should insist that Spectra/Algonquin resubmit a detailed plan to pull the pipe through the bore hole that proves to the public and public officials that all safety assessments were completed and verified by Pipeline Hazardous Material Safety Administration and New York State Public Service Commission which is delegated authority to oversee pipeline safety in NYS. This information should be made public and verified by an independent pipeline safety expert.

The Hudson River crossing is in a highly sensitive region and there was no contingency plan filed with FERC if the HDD pullback did not succeed. Thus, the company’s actions were motivated by expediency and not by public safety and environmental concerns. When FERC released the Environmental Impact Statement (EIS) for the AIM project, we objected to the fact that no alternative to HDD was proposed for the Hudson River crossing. Spectra/Algonquin shouldn't be allowed to avoid environmental review by omitting information from the EIS and then getting a variance from FERC with no opportunity for public assessment or comment.

We insist that FERC halt construction of the AIM project until all federal and state permitting agencies review and comment on the variance that FERC granted to Spectra/Algonquin in order to ensure that environmental and safety issues are fully addressed.

Sincerely,

Safe Energy Rights Group
Stop the Algonquin Pipeline Expansion