



# STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: August 09, 2012

AT (OFFICE): NHPUC

FROM: Randy Knepper, Safety Director

SUBJECT: Docket No. DG 12-088 Granite State Gas Transmission Petition for License to Cross Public Waters at juncture of Little Bay and Piscataqua River in Dover and Newington, New Hampshire

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

The Safety Division 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 CFR Part 192 requirements, as described in Puc 500 rules
- Review of public need and public impact, including applicability of other State regulations
- Conclusions and Recommendations

1. **Petition contents and history.**

On April 9, 2012, Granite State Gas Transmission Company, Inc. (GSGT), filed a petition, pursuant to RSA 371:17 and RSA 371:20, to construct and maintain a single natural gas pipeline under and across the juncture of Little Bay and Piscataqua River that separates the City of Dover and Town of Newington to continue to provide service to its existing interstate gas transmission system that is located in Massachusetts, New Hampshire and Maine. GSGT proposes to locate the natural gas pipeline under Little Bay to replace an existing pipeline that is currently suspended from the Little Bay Bridge. Little Bay Bridge, owned and maintained by the New Hampshire Department of Transportation, is being reconstructed as part of a larger roadway project (Route 16) and GSGT states that the proposed construction will allow the NH DOT project to be completed in a timely manner and allow for uninterrupted flow of the interstate pipeline system.

In its original petition GSGT proposed the construction of the 10 inch nominal diameter pipeline as a horizontally directional drilled coated steel pipeline that will be approximately 30 feet below the bed of the Little Bay and easterly of the existing Little Bay Bridge. While the petition does not specify the material of the pipeline, it is Staff's understanding that the pipeline will

consist of API 5L Grade B X52 grade line pipe and will operate at pressures up to 492 psig.

On July 16 and 18, 2012, GSGT supplemented its original submission to the Safety Division with an approved 50-foot permanent easement plan and 180-foot temporary construction easement shown on attached sketches SK11C386002-EASEMENTS-EXHIBITS A and B a plan view, without a profile of detail of the river crossing up to the water line level of each embankment. The June 26 2012 approval of the easement was from the New Hampshire Long Range Capital Planning and Utilization Committee pursuant to RSA 4:40.

The water crossing location listed in the petition is listed as a Tidal Water on the DES official list of public waters in which RSA 371: 17 is applicable see:  
<http://des.nh.gov/organization/commissioner/pip/publications/wd/documents/olpw.pdf>

The proposed pipeline will transport natural gas with a maximum operating pressure of 492 psig and the crossing will be approximately 1500 feet in length. The pipeline will consist of 10-inch nominal diameter API 5L Grade B X52 steel with corrosion protective coating. The type, grade of steel, and applied coating material were not specified in the petition.

GSGT has provided sufficient documentation to demonstrate that all easements are in place to allow for the gas pipeline to be built under the bed of Little Bay as well as on the northern and southern shore of the Piscataqua River. The parcels on the shores of the Piscataqua River are currently owned by the NH DOT. Standard NH DOT use and occupancy agreements will be in place for those parcels.

GSGT has also represented that the proposed pipeline crossing will not interfere with public rights to use and enjoyment of the Piscataqua River or Little Bay. As planned, the pipeline will be 30 feet below the bed of the river and will be built so that integrity checks can be accomplished with internal line inspection equipment so future access should not be necessary.

## **2. Review of safety requirements as described in Puc 500.**

The N.H. Code of Administrative Rules Puc 506.01 Pipeline Safety Standards:

(a) All utilities shall comply with those pipeline safety regulations established by the United States Department of Transportation which are set forth in 49 C.F.R. Parts 191, 192, 193, 198 and 199, including future amendments thereto.

(b) Where Puc 500 or Puc 800 establishes more stringent requirements than those pipeline safety regulations adopted pursuant to (a) above, the more stringent requirement set forth in Puc 500 or Puc 800 shall apply.

GSGT's petition does not explicitly state that the administrative rules of Puc 500 will be met, but does provide engineering details that show overall compliance with CFR Part 192 which are referenced in Puc 506.01.

The Safety Division review of the petition and attachments submitted to date found the proposed attachments to be in conformance with the applicable sections of the Puc 500 and CFR Part 192.

### **3. Recommendations and Conclusions.**

The Safety Division recommends approval of GSGT's petition under RSA 371:17 and RSA 371:20 with the following conditions:

- a. Staff recommends that the approval be limited to the GSGT natural gas pipeline under consideration in this docket.
- b. Staff recommends that information regarding the grade and type of steel of the natural gas pipeline be submitted to the Commission. The type of cathodic protective coating should be submitted, including the mil thickness of the coating be submitted as record of the file.
- c. GSGT should be directed to operate and maintain the crossing in conformance with the latest CFR Part 192 amendment. All future alterations to the crossing that may impact the public shall conform to the CFR Part 192 latest amendment that are in place at time of submittal of the alteration.

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.

**GGGT HORIZONTAL DRILL  
 AT LITTLE BAY BRIDGE  
 NEWINGTON-DOVER, NEW HAMPSHIRE**

**PRELIMINARY**

REVISIONS	Desc.
No.	Date

Designed	J.W.
Drawn	B.S.
Checked	
Approved	
Scale	1"=100'
Project No.	11C3860
Date	06/20/12

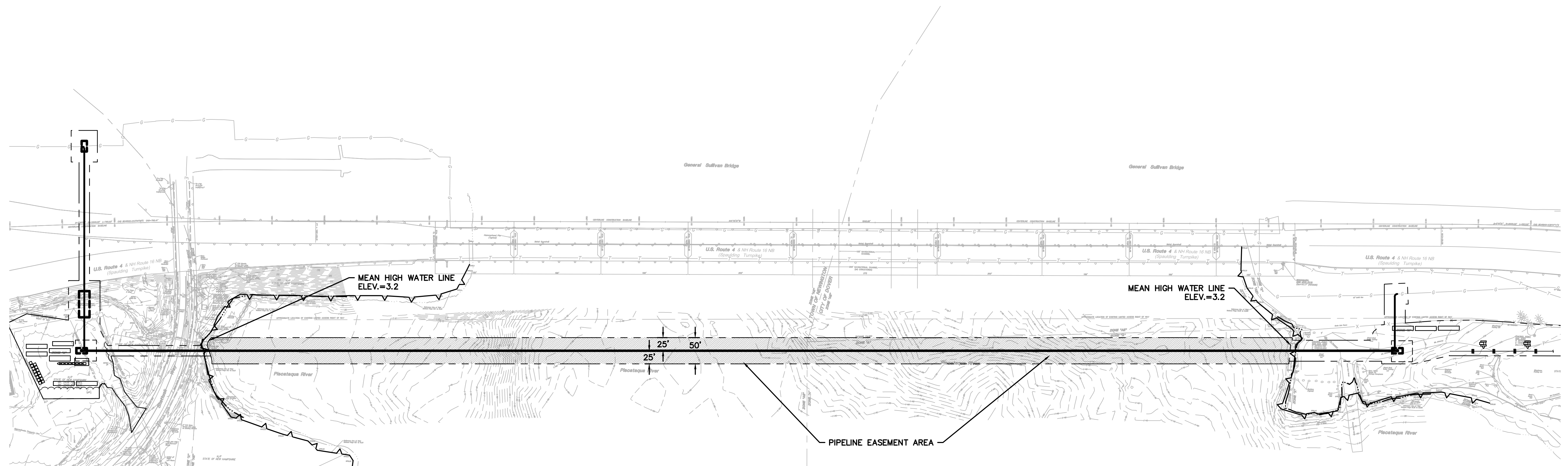
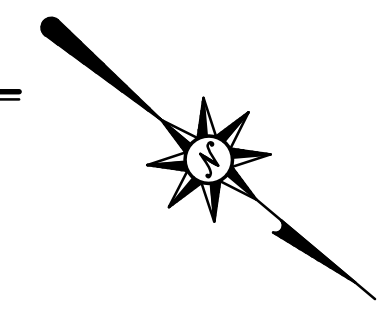
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 SK11C386002-EASEMENTS  
 Title  
**PIPELINE  
 EASEMENT  
 AREA**

Sheet No.

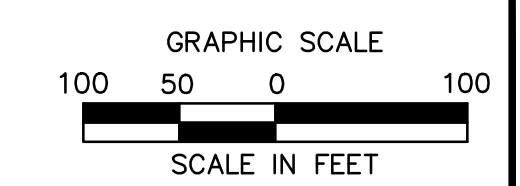
**EXHIBIT A**

**LEGEND:**

- EASEMENT LIMIT LINE
- PIPELINE CENTERLINE
- LOC LIMIT OF CONSTRUCTION LINE
- █ PIPELINE EASEMENT AREA



NOTE: PROPOSED EASEMENT AREA TO BE REVISED UPON ACTUAL PIPELINE INSTALLED. FINAL PIPELINE EASEMENT AREA TO BE LOCATED WITHIN BOUNDS OF ACCESS AND TEMPORARY CONSTRUCTION EASEMENT AREA PER EXHIBIT B.





**GGGT HORIZONTAL DRILL  
 AT LITTLE BAY BRIDGE  
 NEWINGTON-DOVER, NEW HAMPSHIRE**

**PRELIMINARY**

Designed J.W.  
 Drawn B.S.  
 Checked  
 Approved  
 Scale 1"=100'  
 Project No. 11C3860  
 Date 06/20/12

CAD File:  
 SK11C386002-EASEMENTS  
 Title  
**ACCESS &  
 TEMPORARY  
 CONSTRUCTION  
 EASEMENT AREA**  
 Sheet No.

**EXHIBIT B**

**LEGEND:**

- EASEMENT LIMIT LINE
- PIPELINE CENTERLINE
- LOC LIMIT OF CONSTRUCTION LINE
- TEMPORARY ACCESS AND CONSTRUCTION EASEMENT AREA

