

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: July 21, 2014

AT (OFFICE): NHPUC

FROM: Randy Knepper, Safety Director



NHPUC 21JUL'14PM4:01

SUBJECT: Docket No. DG 14-124; Granite State Gas Transmission Petition for License to Cross Public Waters at the Squamscott River in Exeter and Stratham, New Hampshire

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

The Safety Division's 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 49 CFR Part 192 requirements
- Review of public need and public impact, including applicability of other State regulations
- Conclusions and Recommendations

1. Petition contents and history.

On May 13, 2014, 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 Squamscott River that separates the Town of Exeter and Town of Stratham. The proposed pipeline will allow GSGT 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 the Squamscott River by horizontal directional drilling (HDD). The proposed pipeline will replace an unlicensed existing 8 inch nominal diameter gas pipeline, whose integrity has been undermined by dis-bonded coating. The proposed gas pipeline is a transmission line and will be located within an easement that is also used by the joint facilities pipeline owned by Maritimes and Northeast Pipeline with Portland Natural Gas Transmission System. The portion of the Squamscott River subject to this petition is bounded to the north by NH State Route 101 and to the south by properties owned by the Town of Exeter Waste Water Treatment Plant and private owner L. Labonte of Stratham.

GSGT proposes the construction of a 10 inch nominal diameter pipeline as a HDD coated steel pipeline that will be below the bed of the Squamscott River. The petition specifies that API 5L X42 coated steel with a wall thickness of 0.365 inch will be used. The operating pressure of the pipeline will be up to 492 psig (pounds per square inch gauge) and the coating will consist of Fusion Bonded Epoxy with Power Crete applied as an external layer.

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

The proposed pipeline will transport natural gas with a maximum allowable operating pressure of 492 psig and the crossing will be approximately 375 feet in length as the crossing has a skewed alignment. A cross section showing the depth of the HDD was not provided with the petition.

The Safety Division researched and found sufficient documentation to demonstrate that all easements are in place to allow for the gas pipeline to be built under the bed of the Squamscott River as well as on the eastern and western shores. The parcels on both shores of the Squamscott River are currently owned by the Town of Exeter on the western side and L. Labonte of Stratham, a private owner, on the eastern side.

GSGT also represented that the proposed pipeline crossing will not interfere with public rights to use and enjoyment of the Squamscott River.

2. Review of safety requirements as described in 49 CFR Part 192.

GSGT's petition does not explicitly state that the federal rules of 49 CFR Part 192 will be met, but does provide engineering details regarding material and selection of applied coatings that comply with 49 CFR Part 192. Advisory Bulletins regarding incorporations of flooding impacts may also be applicable.

The Safety Division's review of the petition and attachments submitted to date found that the proposed attachments conform with the applicable sections of 49 CFR Part 192.

3. Recommendations and Conclusions.

Based on information provided in GSGT's petition, the Safety Division recommends approval of GSGT's petition under RSA 371:17 and RSA 371:20 with the following conditions:

- i. Approval be limited to the GSGT natural gas pipeline under consideration in this docket.

- ii. GSGT should be directed to operate and maintain the crossing in conformance with the latest 49 CFR Part 192 amendment.
- iii. All future alterations to the crossing that may impact the public shall conform to the latest 49 CFR Part 192 amendments that are in place when the alteration is submitted for approval.

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.

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Pursuant to N.H. Admin Rule Puc 203.11 (a) (1): Serve an electronic copy on each person identified on the service list.

Executive.Director@puc.nh.gov
amanda.noonan@puc.nh.gov
epler@unitil.com
macarthur@unitil.com
mark.naylor@puc.nh.gov
MSmith@orr-reno.com
ocalitigation@oca.nh.gov
randy.knepper@puc.nh.gov
steve.frink@puc.nh.gov

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FILING INSTRUCTIONS:

- a) Pursuant to N.H. Admin Rule Puc 203.02 (a), with the exception of Discovery, file 7 copies, as well as an electronic copy, of all documents including cover letter with: DEBRA A HOWLAND
EXEC DIRECTOR
NHPUC
21 S. FRUIT ST, SUITE 10
CONCORD NH 03301-2429
- b) Serve an electronic copy with each person identified on the Commission's service list and with the Office of Consumer Advocate.
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