

From: "Gentile, Karen (PHMSA)" <karen.gentile@dot.gov>
Subject: Re: FYI: May 2 response letter from PHMSA to Vermont Grassroots group
Date: August 30, 2017 at 11:38:07 AM EDT
To: "Morris, GC" <GC.Morris@vermont.gov>

Thanks so much GC!

Sent from my BlackBerry 10 smartphone.

From: Morris, GC
Sent: Wednesday, August 30, 2017 8:08 AM
To: Gentile, Karen (PHMSA)
Subject: FYI: May 2 response letter from PHMSA to Vermont Grassroots group

Good Morning Karen,

Thanks for your recent reply regarding my request for the letter referenced below.

Rex Evans provided it this morning and I've attached it to this message for your records.

I hope you have an enjoyable vacation this week (without further interruptions from me).

Regards,
GC

From: Evans, Rex (PHMSA) [mailto:rex.evans@dot.gov] ^[L]_[SEP]**Sent:** Wednesday, August 30, 2017 7:39 AM ^[L]_[SEP]**To:** Morris, GC ^[L]_[SEP]**Cc:** Jordan, Bill ; Laperle, Michelle ^[L]_[SEP]**Subject:** RE: request: May 2 response letter from PHMSA to Vermont Grassroots group

attached

From: Morris, GC [<mailto:GC.Morris@vermont.gov>] ^[L]_[SEP]**Sent:** Wednesday, August 30, 2017 6:34 AM ^[L]_[SEP]**To:** Evans, Rex (PHMSA) <rex.evans@dot.gov> ^[L]_[SEP]**Subject:** request: May 2 response letter from PHMSA to Vermont Grassroots group

Good Morning Rex,

Would you forward me an electronic copy of the “May 2 response letter from PHMSA to Vermont Grassroots groups“ referenced in the correspondence below?

If you don't have access to the letter, would you please reply with contact information for the appropriate individual to receive this request?

Thanks in advance,
GC

From: Morris, GC
Sent: Thursday, August 10, 2017 4:36 PM
To: Evans, Rex (PHMSA) <rex.evans@dot.gov>
Cc: Jordan, Bill <Bill.Jordan@vermont.gov>; Laperle, Michelle <Michelle.Laperle@vermont.gov>
Subject: Response & Request: Question from Vermont Grassroots Groups regarding Addison Natural Gas Pipeline

Hello Rex,

I hope this message answers your recent questions. I have inserted responses into your message below.

Upon reading the June 8, 2017 email from the Grass Roots Groups (which you provided following your request for information below), I see that Rachel Smolker references a “May 2 response letter from PHMSA” (perhaps written by Patricia Klinger or her assigns). I not able to locate this letter in my records or email correspondence. You may have forwarded to me already, but if you haven't; would you please send me an electronic copy of it? If you did forward it already, please accept my apologies and my request to send it again.

As always feel free to contract me with further questions or requests for clarification.

Regards,
GC

From: Evans, Rex (PHMSA) [<mailto:rex.evans@dot.gov>]
Sent: Wednesday, August 02, 2017 11:10 AM
To: Morris, GC <GC.Morris@vermont.gov>; Jordan, Bill <Bill.Jordan@vermont.gov>
Cc: Laperle, Michelle

<Michelle.Laperle@vermont.gov>^[SEP] **Subject:** FW: Question from Vermont Grassroots Groups regarding Addison Natural Gas Pipeline

See questions below – some questions are directed to us, but think we can answer appropriately if we find out about general topics of cover and padding.

Cover – I know we spoke with VGS –

I think this cover survey was on entire line, correct? Yes. VGS intended to make a cover survey of the entire line. The depth of all pipeline areas which were installed by the open trench method was determined by analyzing data gathered (by land survey/position methods) during and following project construction. The company surveyed the exact locations and elevations of the pipeline girth welds (which were installed by the open trench method, prior to backfilling). Later, the finish grade elevations were also surveyed, directly above these weld locations.

Please note: This cover survey was not completely-contiguous because several pipeline segments were installed by trenchless technologies where it was not possible to accurately locate the pipeline-weld elevations prior to backfilling. The company plans to verify the depth of pipeline segments installed via trenchless technologies by a review of the specific as-built-profile documentation/records provided by the contractors which made these installations.

And that was in process, correct? Yes

What was the expected time frame? The company will be submitting their depth of cover analysis for the entire pipeline project, to the Vermont PUC this Friday, 8/11/2017.

• I believe the line section through the park area was at least 36”, but VTPSD had agreed to 48”, correct? The pipeline was installed through a town park in Hinesburg VT which has been a particular focus of the Grass Roots Group, however I believe you may be asking about the pipeline installation through the Red Maple Green Ash Swamp in New Haven VT. (Below, I’ve provided information for both locations.)

• The method for pipeline installation under Geprags Park (in Hinesburg VT)

was revised to be by HDD to minimize environmental impact(s); VGS Engineering Compliance Manager informs us they agreed to install pipe 30 feet deep in that area. Pipeline installation under a road, immediately south of the park, was incorporated into the same HDD; design drawings specify depths of 5 feet under the road and 4 feet under the road-side ditches.

- The company determined all pipe depths through the Red Maple Green Ash Swamp (in New Haven VT) were at least 36”, however Vermont Gas Systems Inc. had agreed to install the pipeline at 48” in areas where it is located in the Vermont Electric Power Company, VELCO, Right of Way. (see David Berger’s memo on this topic attached)

- Were there any other areas of concern known at this time? To my knowledge, the current pipeline depth of cover conditions do not include violations of the minimum gas pipeline safety regulations. However the Grassroots Groups have indicted their concern related to additional depth requirements contained in the project’s state approval. (Vermont PUC Certificate of Public Good)

The padding issue –

I think this was being looked at by David Berger, Consultant – correct? Yes.

He was going to assess the remedial action the company had taken to ensure acceptable, correct? Yes. David Berger will analyze the conditions where the company plans to leave existing sections of pipeline which are not supported in the manner which it was designed/specified. He will also provide applicable recommendations for those conditions.

When is that expected to be done? While this process has been started, I’m currently unable to provide a completion date. David Berger has requested further information related to the analysis and our staff is coordinating this schedule. I have requested their estimate and will forward it to you when I know (in the near future).

- I can remember how long of a section this was that was of concern, please confirm scope of that specific issue and were there any others? Padding/pipe support appear to be out of design specification in several areas. The primary concern is the possibility these conditions may contribute to the establishment of a corrosion cell(s) (see attached Bushman Associates white paper). In two areas, a 3949 foot long section and a 360 foot long section, the pipe appears to

have been laid directly on the trench bottom of in-situ clay. In four areas, a 237 foot long section, a 136 foot long section, a 93 foot long section, and a 150 foot long section, records indicate the pipe was laid on sand berms and several sections were installed in swampy areas without structured pipe support.

Thanks, Rex

From: protect geprags [<mailto:protectgeprags@yahoo.com>] **Sent:** Thursday, June 08, 2017 8:56 AM
To: Klinger, Patricia (PHMSA) <patricia.klinger@dot.gov>
Subject: Question from Vermont Grassroots Groups regarding Addison Natural Gas Pipeline

Patricia Klinger, Acting Director, Governmental, International and Public Affairs
Office of Governmental, International and Public Affairs
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
1200 New Jersey Ave., S.E.
Washington, DC 20590
patricia.klinger@dot.gov

June 8, 2017

Rachel Smolker, on behalf of Vermont grassroots organizations and citizens

680 Sherman Hollow Road
Hinesburg, Vermont 05461
(802) 482-2848
protectgeprags@yahoo.com

Greetings Ms Klinger,

Thank you for the May 2 response letter from PHMSA to Vermont Grassroots groups. That letter addressed issues raised in our October 2016 submission of concerns about unsafe construction and lack of compliance with regulations for the Vermont Gas Addison Natural Gas Pipeline Project. We appreciate that PHMSA took our concerns seriously and visited the project on March 29th 2017. We would appreciate if you could provide answers to the questions below (1-6) that we have about that letter and the issues.

In your May 2, letter, it is stated that *“Vermont Gas will complete a depth of cover survey in May 2017 to confirm that the pipeline is installed at the proper depth”*.

1) Was this survey standard practice - a requirement at the completion of the project that pre-existed the PHMSA visit? Or was this survey recommended or required by PHMSA based on the outcome of their March 29 visit or other assessment?

2) If PHMSA required the survey, what was the reason for demanding it?

3) Was the survey required for the entire 41 miles of this phase of construction or just the area mentioned in the prior sentence of the May 2 letter [*“Vermont Gas records indicate that it is using in line inspection tools to inspect the pipeline for construction defects, **including the segment which runs along the bottom of the clay ditch without padding**”*]

4) Can you clarify exactly where the segment referred to in the above sentence is located, and why, if that was the area surveyed, a survey was required of that segment?

5) From PHMSA perspective, what is the significance of depth of cover for pipeline construction and safety? Why does depth “matter” and what are consequences of too-shallow or otherwise incorrect depth?

6) Referring to "lack of padding” in the above sentence, was this clay ditch the only trenched site along the 41 mile route where there was a lack of padding? If not, where else? Was padding added or was there another solution to the failure to put padding in place? What are the consequences of lack of padding?

Thank you in advance for your timely response. We also look forward to hear from you with respect to the issues raised in the letter to PHMSA dated April 10th 2017, and which you indicated was forthcoming in your May 2 correspondence. (Those concerns were compiled in attachment 8 as delivered)

Rachel Smolker, on behalf of Vermont Grassroots groups.