

These comments are in regard to Williams's proposed Constitution Pipeline, docket # PF12-9-000. These comments are being submitted by Mary Sweeney, 51 Chestnut St., Windsor, NY.

1) Williams online site says that the Williams Susquehanna Supply Hub will include "The new 120-mile Constitution Pipeline, which will connect our gathering system in Susquehanna County, Pa., to the Iroquois Gas Transmission and Tennessee Gas Pipeline systems in Schoharie County, N.Y." and that the "Constitution Pipeline initially will be designed to transport at least 500,000 dekatherms per day of Cabot's Marcellus production, but will be expandable to meet growing demand for takeaway capacity in northeast Pennsylvania. " See:

<http://co.williams.com/feature/shale-gas-revolution/>

One dekatherm is equivalent to about 1 Mcf. Multiply 500,000 dekatherms per day by 365 days, and you get 182,500,000 Mcf per year.

PA DEP Marcellus production records for 2011 are available at:

<https://www.paoilandgasreporting.state.pa.us/publicreports/Modules/DataExports/DataExports.aspx>

According to those records, in 2011, total production for all of Susquehanna County was about 200,000,000 Mcf, an amount roughly equivalent to the minimum amount that Williams intends to feed into this single proposed pipeline year after year, presumably for many years.

I understand that there are shale gas wells in Susquehanna County that have been drilled that are not yet producing, and I know that more shale gas wells are planned for that region. However, many of the wells that have been drilled to date are in what is likely, judging from the geology maps I have seen, to be an especially "sweet" spot, and I do not know if anyone knows at this point if the rest of the county will prove as productive. Also, shale gas wells deplete very rapidly, so if this pipeline is to be supplied from Susquehanna County alone, then a very, very aggressive and expensive drilling program would be needed. Furthermore, there are other pipelines serving Susquehanna County. I question whether Williams's 500,000 dekatherms-per-day estimate is sustainable over the long haul, absent an expansion of its drilling program around areas of the proposed Constitution Pipeline that are outside Susquehanna County, PA. As far as I know, the Constitution Pipeline is supposedly intended as a transmission line—i.e. it is supposedly not being constructed to encourage additional drilling in other parts of PA or in NY state. Is this realistic? If additional areas must be drilled to keep this line in service for a reasonable length of time, shouldn't the public be made aware of this?

When the Millenium Pipeline was planned, here in the Southern Tier of NY we were assured it was for long-distance transmission only. There are many of us who did not oppose the Millenium Pipeline but who would have opposed it if we had known that its presence would encourage gas development in our region. I think it is in the public's interest to require Williams to honestly and realistically address the question of whether it intends to eventually use the Constitution Pipeline to transport gas that originates somewhere other than Susquehanna County, PA. If, on the other hand, Williams does not intend to feed gas into the Constitution Pipeline from areas outside Susquehanna County, PA, then I question whether a pipeline of this size is needed.

2) Marcellus gas is likely to have relatively high radon levels. Radon has a short half-life, but the Constitution Pipeline would be transporting the gas a relatively short distance to consumers). Given the radon issue, is construction of this pipeline in the public interest? How will radon levels of this gas be monitored?

3) In Broome County the proposed pipeline route passes through wooded areas that I am quite familiar with, both because my husband and I own land along the proposed pipeline route and because I take a lot of nature walks in the area. FERC should be aware that these woodlands are home to many rare and threatened species, such as purple trillium, groundpine, and bald eagles. I am deeply concerned about damage to the forest habitat, including damage from fragmentation.

4) FERC should be aware that Williams has not been especially forthcoming with information in regard to this pipeline. My husband and I own land that was included in the study corridor, and the letter that we received from Williams did not even specify which part of the land was included or what the proposed pipeline route was. We had to get online and do several hours of research to get that information. If this project is in the public's interest, then shouldn't the public be kept fully and completely informed at every step of the way?

5) The proposed route would put the pipeline literally in some people's back yards. I am concerned about safety, particularly in areas where the pipeline may be a "Class I" pipeline.

6) It is my understanding that Williams has begun construction on a compressor station in Brooklyn, PA and I am concerned that this station is being developed to serve as part of the Constitution Pipeline system, even though FERC has not yet approved the Constitution Pipeline. It is my understanding that the compressor station was permitted under a GP-05 PA DEP permit. I hope that FERC will look into this situation.

Document Content(s)

14225.TXT.....1-2