



Town of Merrimack, New Hampshire

Community Development Department

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Planning - Zoning - Economic Development - Conservation

March 5, 2015

Lori Ferry, Project Manager
AECOM
10 Orms Street, Suite 405
Providence, RI 02904

RE: Information Request, Tennessee Gas Pipeline Company, LLC, Northeast Energy Direct Project, FERC Docket No. PF14-22

Dear Ms. Ferry:

The Town of Merrimack ("Town") received and reviewed the Tennessee Gas Pipeline Company, LLC ("TGP") January 26, 2015 request that the Town identify whether sensitive environmental areas within 0.25 or 0.50 miles (dependent on the nature of the sensitive area) of the proposed Northeast Energy Direct Project ("NED Project") - a natural gas pipeline which will traverse the Town.

Given that the NED Project as currently proposed impacts multiple conservation areas, wellhead protection areas (including the aquifer that provides more than half of the Town's water) and crosses one of the Town's major sewer interceptor lines, two major protected rivers and may have impacts to the NH Plating Site (a Federal Superfund Site), scenic areas, habitat for identified endangered species, recreational areas and the residences and private water supplies of many of the Town's citizens, it is vital to the Town that all such areas be accurately assessed and identified so as to ensure that all impacts to such sensitive receptors are avoided and/or mitigated. To this end the Town is highly motivated and willing to assist in accurate identification of these areas. As such, we have enclosed a preliminary list of such areas.

Unfortunately, the Town's resources are limited and the TGP request imposes a significant burden with regard to both staff and financial resources. The Town, must, therefore, request additional time and assistance from TGP to supplement these materials. We look forward to a public meeting with TGP to discuss how to best establish a process that will allow these areas to be fully identified and addressed.

The Town also asks that TGP provide the Town with an opportunity to review and comment upon any such materials prepared for submission to the Federal Energy Regulatory Commission in the above captioned matter in advance of such filing.

Sincerely,



Timothy J. Thompson, AICP
Community Development Director

cc: Eileen Cabanel, Town Manager
Kimberly D. Bose, Secretary

Attachment: Preliminary List of "Sensitive Environmental Areas" within 0.25 or 0.50 Miles of NED "Study Corridor"

- Two Town-owned parcels of conservation land are crossed by the proposed route:
 - Horse Hill Nature Preserve; and
 - Gilmore Hill Memorial Forest;
- At least 12 wetland areas (including Naticook Brook and the Merrimack River) are crossed by the proposed route
 - At least 4 ponds and small streams are located on the Horse Hill Nature Preserve property, providing important habitat area for several endangered/threatened species;
 - An area of Gilmore Hill Memorial Forest contains an area of sensitive vegetation/habitat that will be explained further in future responses;
 - Of particular concern regarding the Merrimack River is the construction of the pipeline under the river, the permanence of the installation under the river as it may be affected by flow or river course changes over time, and the safety history of such river crossings.
 - The Lower Merrimack River is a Designated Protected River under NH RSA 483 in accordance with the State's Rivers Management and Protection Program.
- The Town's highest yield aquifer is located within the study area, which is part of both a Wellhead Protection Area and Aquifer Conservation District (see also attached letter and map from MVD);
 - 2 of the Merrimack Village District (MVD) water supply wells are located in close proximity to the proposed route (MVD Well #2 is approximately 550 feet from the proposed route, MVD Well #3 is approximately 2500 feet from the proposed route);
 - This aquifer and pair of supply wells provide more than half of the water service to the Town;
- The proposed route would cross MVD waterlines in at least 10 locations;
- The proposed route would cross municipal and private sewer lines in at least 4 locations:
 - Camp Sargent Rd (across from Talant Rd);
 - The private Merrimack Premium Outlets' sewer lateral;
 - The entrance to Elbit Systems on Rt. 3 (Daniel Webster Highway); and
 - The Town's main sewer interceptor line along the B&M Railroad tracks/right-of-way
- The proposed route is within 0.25 and 0.50 miles of several residential neighborhoods, some of which rely upon private wells and septic systems.



MERRIMACK VILLAGE DISTRICT

March 3, 2015

Mr. Timothy J. Thompson
Community Development Director
Town of Merrimack
6 Baboosic Lake Road
Merrimack, NH 03054

RE: AECOM Information Request for Tennessee Gas Pipeline Company, LLC (NED Project) Docket Number: PF14-22

Dear Mr. Thompson,

Thank you for the opportunity to respond to the Information Request that was submitted to the Town of Merrimack by AECOM on behalf of the Tennessee Gas Pipeline Company, LLC. As you know, the Merrimack Village District is responsible for providing potable water to 25,000 residents in the Town of Merrimack, New Hampshire. All of our water resources are derived exclusively from groundwater that is pumped from a series of high-yielding wells sited in three stratified drift aquifers. On an annual basis, we provide approximately 800,000,000 gallons of clean, potable water to our customers. The intent of this letter is to make it clear that the proposed pipeline route would directly cross sensitive environmental areas (designated protected aquifers, Wellhead Protection Areas, and surface water bodies that contribute to the availability of potable groundwater resources) that are critical to the Districts' groundwater resources.

Tennessee Gas Pipeline Company, LLC is in the pre-filing process of siting a pipeline route (identified as the NED Project) through the Town of Merrimack. One of the proposed routes of the NED gas pipeline crosses through the center of one of the principal aquifers utilized by the MVD (approximately pipeline mile marker 168), known locally as the Naticook Brook Aquifer. The MVD currently operates two Production Wells (MVD-2 and MVD-3) that pump groundwater from this Aquifer, which provides approximately 50% of the MVD's water supply capacity. This Aquifer is protected by the Town of Merrimack through an Aquifer Protection Overlay District and the contributing area for the two Production Wells is a registered Wellhead Protection Area (WHPA) with the State of New Hampshire. Loss of use of such a critical resource would have devastating consequences on our ability to provide a reliable source of water to the residents and businesses in the Town of Merrimack. The District is very opposed to the siting of a petroleum product pipeline through the WHPA in such close proximity to its Production Wells.

The proposed route of the pipeline also crosses Naticook Brook (pipeline mile marker 167.9-168) and is approximately 0.25 miles from Greens Pond. These two surface water bodies are hydraulically connected to the underlying sand and gravel Naticook Brook Aquifer. Recharge from these two surface water bodies plays an important role in maintaining

groundwater levels in the Aquifer. Any contamination or adverse impacts to either of these two water bodies will also likely impact groundwater quality.

Another major Aquifer (Witches Brook Aquifer) provides 33% of the MVD's groundwater capacity and is located in the towns of Amherst, Hollis, and Merrimack. The proposed pipeline route crosses this municipally designated Aquifer in the Town of Amherst between pipeline mile marker 161.5 and 165. Although the WHPA for these MVD Production Wells is about a mile from the proposed pipeline route, the MVD wants to also emphasize the importance of this regional Aquifer as a source of potable water for thousands of people in the local area.

The MVD has a mutual aid agreement with Pennichuck Water Works, Inc. to provide water in the event of an emergency when the MVD cannot meet demand. The proposed natural gas pipeline route crosses through a large swath of land that is part of the watershed for the surface water that Pennichuck Water relies on to meet the needs of its 86,000+ customers.

In summary, the proposed natural gas pipeline route crosses directly through the Wellhead Protection Area for the Naticook Brook Aquifer that provides 50% of the groundwater resources available to the MVD. It also crosses through a regional aquifer (Witches Brook Aquifer) that the MVD relies upon for another 33% of its groundwater capacity. Finally, the proposed pipeline is also located within the surface watershed for Pennichuck Water Works, Inc., a mutual-aid water supplier to the MVD. In total, approximately 83% of MVD's total water capacity is derived from the District's existing Production Wells that are located within close proximity to the proposed pipeline route. Loss of use of either of these Aquifers would have catastrophic consequences for the MVD. Based upon the results of previous groundwater investigations, it appears very unlikely that these existing wells of such high yield capacity could be relocated anywhere else in the Merrimack Service Area.

Best regards,



Ronald Miner, Jr.
Superintendent

CC: MVD Board of Commissioners
Timothy Thompson, Community Development
Emery & Garrett Groundwater Investigations

Attachment

**New Hampshire Surficial Aquifers
Transmissivity Units**

- 0-2000 FT. SQUARED PER DAY
- 2000-4000 FT. SQUARED PER DAY
- 4000-8000 FT. SQUARED PER DAY
- >8000 FT. SQUARED PER DAY

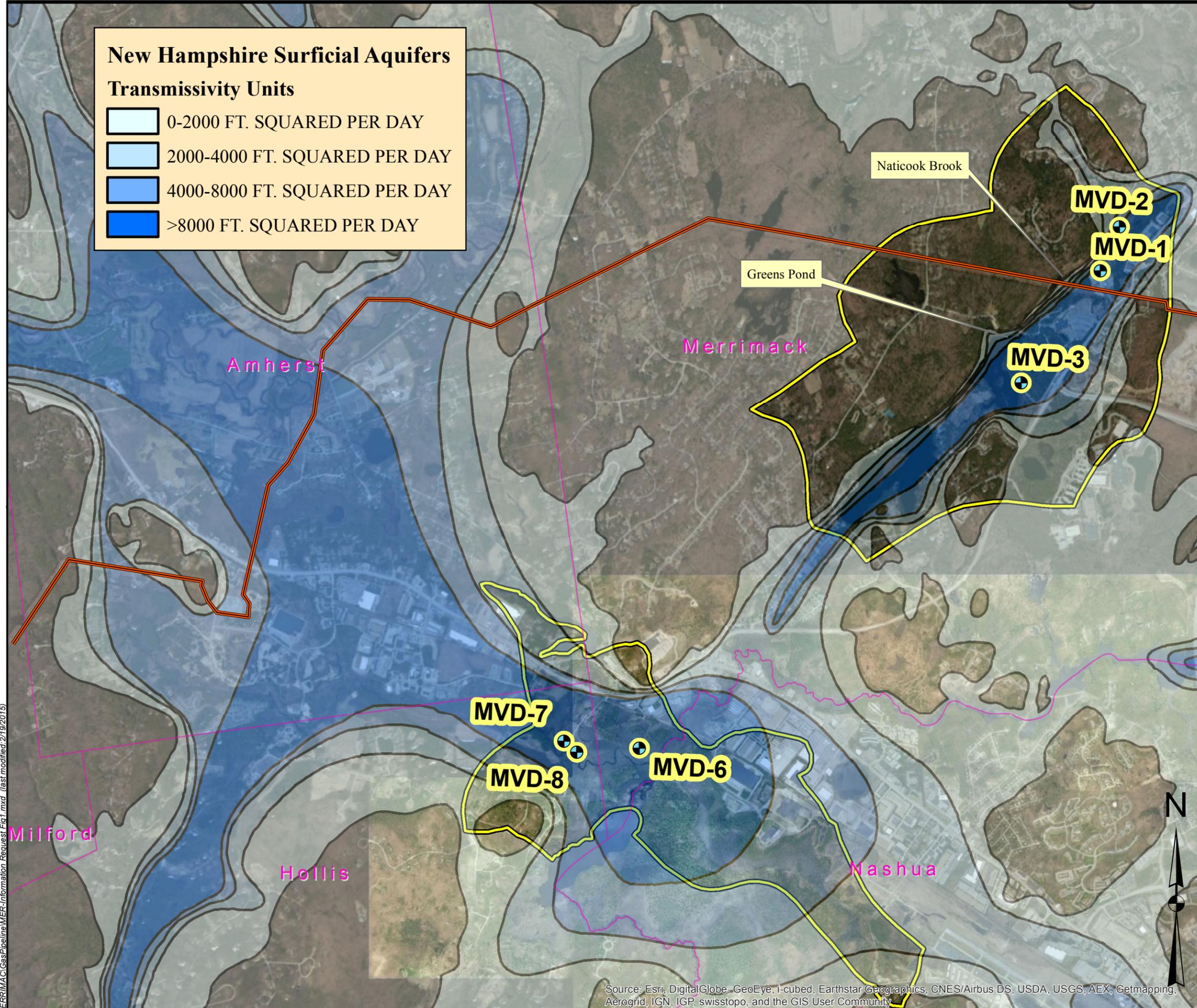
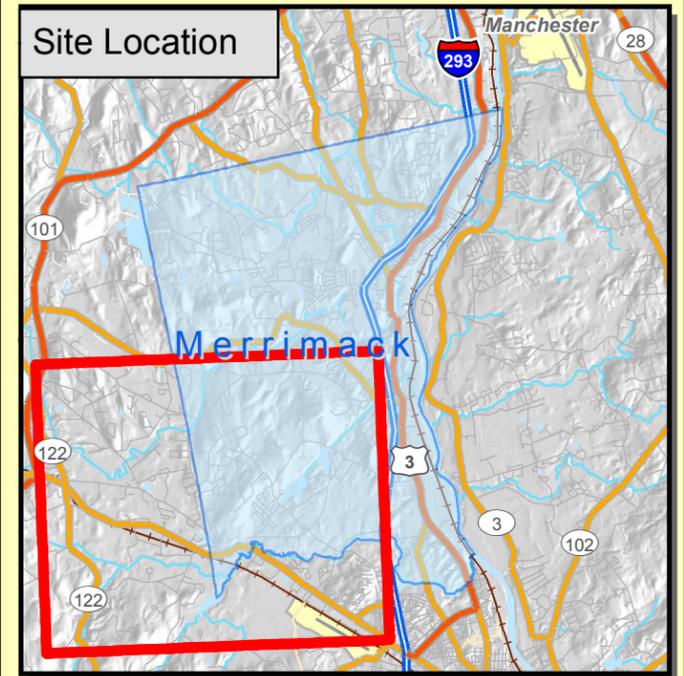


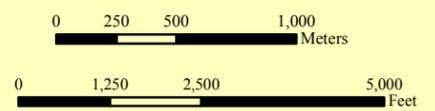
FIGURE 1
Wellhead Protection Areas and
MVD Production Wells Near
Proposed Natural Gas
Pipeline Route
Merrimack, New Hampshire



1 inch = 16,667 feet 1:200,000

- MVD-2 MVD Production Well
- Wellhead Protection Area (WHPA)
- Proposed Natural Gas Pipeline Route
- Town Boundaries

1:30,000
1 inch = 2,500 feet



**Emery & Garrett Groundwater
Investigations, LLC**

FIGURE 1

Source: Esri, DigitalGlobe, GeoEye, i-cubed, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

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