

Ladies & Gentlemen of the Merrimack Town Council

The SORLAC and LMRLAC are charged by the State of NH with responsibility for overseeing the management and protection of designated river sectors in Southern New Hampshire.

In that regard, we note with satisfaction that, as reported by the PHMSA, the nationwide incidence of fatalities resulting from gas transmission line ruptures, when normalized per mile of installed pipe, has steadily declined in recent years. However the data for significant gas line problems occurring at river crossings is not as readily available.

The prospective installation of new gas pipelines under our protected NH rivers raises some specific questions;

1. We ask for further information and details on the method of installation of the pipeline under our protected rivers and their tributaries, including methods of boring, lubricants used, etc.. Where else have these methods been used and with what results?
2. What has been the history of significant gas transmission line accidents associated with river crossings in recent years? In NH?
3. How many natural gas transmission lines already cross under Designated Protected Rivers and where? Have there been any problems in the last two decades? Any in New Hampshire?
4. The threat of scouring on pipelines buried under rivers has been well documented and minimum burial depths specified, along with the requirement for monitoring and operating procedures that would shut down pipelines during periods of high river flow that could threaten the pipelines through scouring. To what extent does KM intend to exceed the minimal burial depth specified, ensure that the intended burial depth is maintained over time, and establish continual monitoring and contingency shut down capability and procedures during periods of high flow?
5. What special actions does KM propose to take to ensure the safety of these protected rivers should this project proceed?

Respectfully Submitted,



Nelson R. Disco

Vice Chairman of LMRLAC