

NYPSC Case 11-T-0654

Application
of
New York State Electric & Gas Corporation
for
Certificate of Environmental Compatibility and Public Need Pursuant to
Article VII, Section 121-a of the Public Service Law

Seneca West Pipeline Interconnect
Towns of Big Flats and Horseheads, and Village of Horseheads
Chemung County, New York

APPENDIX B

Additional Information Requested

New York State Electric & Gas Corporation

Case 11-T-0654- Application of New York State Electric & Gas Corporation for a Certificate of Environmental Compatibility and Public Need Pursuant Article VII Section 121-a of the Public Service Law for Approval to Construct a 4.9 Mile Natural Gas Transmission Pipeline and Associated Facilities in the Towns of Big Flats and Horseheads and the Village of Horseheads, Chemung County.

Appendix B : Additional Information Requested

Request #1

In Figure 3, the applicant should provide the approximate location of the proposed pipeline and label it accordingly on this figure.

Response

Figure 3 has been revised and is included as Attachment 1 to Appendix B.

Request #2

The applicant should provide a list of the roads that are being crossed by the project, as well as, an indication of the road designation (i.e., town, county, and /or state) and the crossing method that will be used for each road crossing.

Response

Below is a table that lists each road crossed by the pipeline, the road's designation (i.e., town, county, state or private) and the crossing method that will be used for each road crossing.

Roads To Be Crossed

| Road | Designation | Crossing Method | Nearest Station |
|-----------------------------------------|----------------------------------|------------------------|------------------------|
| Yawger Road | Town of Big Flats (abandoned) | Open-cut | 1+69 |
| Upson Road | Town of Big Flats | Open-cut | 25+40 |
| Chambers Road (County Route 35) | Chemung County | Open-cut | 52+85 |
| Private Road/Drive | Private | Open-cut | 95+00 |
| Private Road/Drive | Private | Open-cut | 111+80 |
| Barnes Hill Road | Town of Big Flats | Open-cut | 112+41 |
| Woodgate Drive | Town of Horseheads | Open-cut | 149+69 |
| Prospect Hill Road | Town of Horseheads | Open-cut | 151+40 |
| Hickory Grove Road (County Route 57) | Chemung County | Open-cut | 192+83 |
| Oak Hill Road | Town of Horseheads | Open-cut | 205+81 |
| Private Road/Drive | Private | Open-cut | 208+25 |
| Private Road/Drive | Private | Open-cut | 228+81 |
| Gardner Road | Village of Horseheads | Open-cut | 246+10 |

Request #3

The applicant should explain how locating a 1,100 psig line just over 100 feet from the lot of houses shown on sheet 9 of 14 will not pose an undue hazard to persons or property. In addition, the applicant should explain whether it considered any alternatives to locating the line in such proximity to the houses.

Response:

In determining that the pipeline location poses no undue hazard to persons or property, NYSEG considered the following features of the pipeline's design, maintenance and operating activities, and policies and programs currently in place, and the company's experience in safely operating high pressure transmission lines in close proximity to housing:

- 1) The proposed pipeline will be built to Class 3 Location standards, which will require that the pipeline be operated at less than 50% of its specified minimum yield strength and that all welds be X-rayed. The pipeline will have a wall thickness of 0.219 inches and be fabricated of X-52 steel with a specified minimum yield strength of 52,000 psi. At a maximum operating pressure of 1,100 psi, the pipeline will operate at 42% of specified minimum yield strength.
- 2) At the completion of its construction the pipeline will be hydro tested to 150 percent of its maximum operating pressure. Pig launchers and receivers installed on the pipeline will allow it to be inspected internally with a caliper tool that will identify non-conforming pipeline geometry issues that require repair prior to placing the pipeline in operation.
- 3) The proposed pipeline will be leak surveyed each calendar year and in no case less than every 15 months.
- 4) The pipeline will be cathodically protected to address the threat of internal corrosion of the pipe wall. Test points will be established along the pipelines length where inspections will be performed annually to determine the status of the cathodic protection system. In addition the pipeline will have a close interval survey performed in accordance with NYSEG Gas Operating and Maintenance Procedures (O&M) and Integrity Management Program (IMP) over its entire length to serve as an independent evaluation of the pipeline corrosion status. The threat of internal corrosion of the pipeline will also be monitored at an internal corrosion coupon station that will be installed at the pipeline's interconnection with the Inergy Seneca Lake Storage Project west pipeline.
- 5) Twice annually, NYSEG will inspect surface conditions on and adjacent to the pipeline right of way for any indication of leaks, construction activity and other factors affecting safety and operation. One of these surveys will be performed in conjunction with the annual leak survey.
- 6) The operating pressure of the pipeline will be continuously monitored by NYSEG gas control. Alarm limits will be set to notify the operator whenever operating pressures fall out of acceptable operating ranges.
- 7) The gas transported by the pipeline will be odorized in accordance with NYSEG's O&M manual Section 8.200. Odorant injection rates will be continuously monitored by gas control and alarm points established to alert the operator should odorant concentrations fall outside of accepted levels. The

odorant concentration will be monitored on a weekly basis by qualified NYSEG personnel to ensure odorant concentrations are in compliance with NYSEG's O&M manual.

8) NYSEG's proposed pipeline will be covered by the requirements of NYSEG's IMP. Because pig launchers and receivers will be installed, internal inspections of the pipeline with smart tools can be completed as prescribed by the IMP. This will permit early detection of internal corrosion issues as well as identify anomalies on the pipeline's external surface. The IMP will also evaluate and address risk, threats and HCA identification, and identify assessment activities and frequencies as well as other Part 255 mandated IMP requirements that pertain to pipelines operating at greater than 20% specified minimum yield strength.

9) For the approximate 780 feet length of pipeline proposed behind the lots of houses, approximately 460 feet of the pipeline will be installed by directional drill at depths in excess of the 3 foot specified minimum burial depth. The pipeline will be externally coated with a durable layer of Powercrete over a base coating of Fusion Bond Epoxy. The increased burial depth and durable coating will decrease the potential of damage to the pipeline from outside forces.

10) In response to an invitation from NYSEG, home owners along Biltmore Drive met with NYSEG representatives on September 22, 2011 to discuss the proposed location of the gas pipeline 20 feet from the back of their properties. NYSEG provided a map of the proposed pipeline location, answered questions asked by the landowners about its construction and operation, and increased general awareness of the homeowners to the pipelines location.

11) Four (4) above grade pipeline markers will be located in the area to identify the pipelines location. The markers will identify the pipeline as a natural gas pipeline, identify NYSEG as the operator and include a contact phone number for NYSEG.

12) NYSEG has a demonstrated history of safely operating high pressure gas transmission pipelines in proximity to houses. NYSEG built the Seneca Lake Storage Project west and east pipelines in 1996 and operated them until their sale to Inergy in 2011. The pipelines, which totaled approximately 56 miles in length, were located within 200 feet of approximately 45 homes. The pipelines operated safely without incident during that time period.

NYSEG considered the following alternatives to locating the line in proximity to the houses.

1) NYSEG reviewed a route that would have paralleled the Dominion lateral from Dominion's transmission line to its Gardner Road M&R station. This route passed in close proximity to the Gardner Road elementary school and to 20 homes along an approximate 2,500 feet of its length . For these reasons this route was not selected.

2) NYSEG had proposed the Seneca West Pipeline Interconnect (SWPI) project in an application filed in March 2002 with the New York State Public Service Commission in Case C02-T-0392. This application was subsequently withdrawn. The project was titled the Elmira Natural Gas Transmission Line. In that application, the pipeline was proposed in the back yards of the lot of houses on Biltmore Drive within the NYSEG electric transmission right of way. In the present application, NYSEG relocated the pipeline to its currently proposed location 20 feet outside the property lines of the lot of houses.

Request #4

The applicant should indicate whether it will install gas sampling equipment to monitor the gas quality coming into their system at all times to ensure that they do not transport gas with H₂S directly into their distribution system.

Response:

NYSEG will install gas sampling equipment at the Yawger Road M&R station to monitor H₂S levels in the gas transported onto its pipeline and will take the appropriate steps when concentrations become higher than allowed to protect NYSEG's pipeline and distribution system.