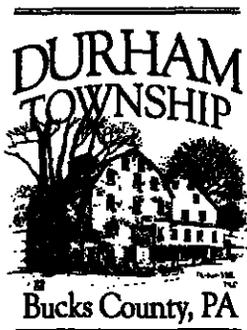


ORIGINAL

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August 20, 2015

Kimberly D. Rose, Secretary  
Federal Energy Regulation Commission  
Room 1A  
888 First Street, NE  
Washington, DC 20426

Re: Docket No.: PF15-1-000  
PennEast Pipeline Project  
Durham Township, Pennsylvania

FILED  
SECRETARY OF THE  
COMMISSION  
2015 AUG 31 A 11: 37  
FEDERAL ENERGY  
REGULATORY COMMISSION

Dear Secretary Rose:

The Durham Township Board of Supervisors has been closely following the proposed PennEast Pipeline Project and its potential route through eastern Pennsylvania and in particular through Durham Township and under the Delaware River into New Jersey. Many of our area residents and non-profit groups have sent correspondence to both FERC and the township and attended our monthly board meetings in opposition to the project. In our December 4, 2014 correspondence to FERC we addressed general concerns pertaining to adverse effects the proposed PennEast pipeline would have on Durham Township, including its wetlands, geology, drinking water, land preservation and historic sites. We once again take this opportunity to provide you with additional information we utilized in our analysis and conclusions stated below.

The firm of Maser Consulting, P.A. of Clinton, New Jersey has been appointed by the Durham Township Board of Supervisors to provide geological consulting services to the township specifically to monitor the PennEast Pipeline project. Maser Consulting's professional opinion is that, based on review of various reports and their knowledge of the proposed PennEast Pipeline, that the following testing, investigations and evaluations be employed by PennEast based on site specific conditions at a subject area of the pipeline alignment:

- Review historical aerial photographs of properties along the proposed path to identify current and former structures and their impact on pipeline construction.
- Review existing geologic maps to identify Karst geology

- **Conduct a geophysical investigation in the proposed PennEast Pipeline alignment and extend it through known Karst geology in Carbon, Northampton and Bucks Counties, Pa. There is approximately 13 miles of the proposed 108 mile alignment that has been identified to be located within Karst geology.**
- **Geophysical investigations should be conducted to characterize the location of the Karst i.e. limestone /dolomite carbonate bedrock. This may consist of a combination of multichannel analysis of surface waves (MASW), electrical resistivity imaging (ERI) surveys and ground penetrating radar (GPR).**
- **The positional location should be referenced using a Trimble ProXH global positioning system.**
- **Real time differential corrections should be incorporated in the analysis by the Wide Area Augmentation System (WAAS), where the resulting differential GPS (DGPS) have a horizontal accuracy of approximately 3 feet.**
- **The Geophysical investigation results should be presented as an overlay on a GIS base map identifying the pipeline alignment and adjacent cultural natural features.**
- **Conduct an independent assessment of cultural resources along the proposed pipeline path.**
- **Conduct an independent inventory and assessment of water supply wells along the proposed pipeline path and assess potential impact due to pipeline construction.**
- **Evaluate potential for storm water concerns (REC) during construction and take necessary engineering precautions.**
- **Conduct wetland ecological assessment along the proposed pipeline. Evaluation issues such as threatened or endangered species with respect to State and Federal Regulations.**
- **Title records of properties along the proposed pipeline path(s) should be reviewed to identify environmental liens and/or activity and use limitations (AULs), such as environmental covenants of easement for impacted soils.**
- **Environmental assessment of the proposed alignment may be considered to identify potential Recognized Environmental Concerns.**
- **Should AULs be identified, or the proposed pipeline path include sites identified as impacted by the above EPA and PADEP websites, create "clean corridors" so that workers are protected during installation of the pipeline, and include this cost with the overall cost of soil removal and disposal for pipeline construction. We recommend pre-testing of soil in areas of existing and previous farmland to analyze for historic pesticides and herbicides, which consists of priority pollutant pesticides (PPP), lead and arsenic and associated chemical impacts. Based on the chemical test, soil management protection should be prepared and followed along with independent oversight.**
- **Review the pipeline company's geophysical results relating to Karst features along proposed pipeline route to evaluate possible system integrity issues during the pre-construction phase**

- Conduct baseline groundwater (including public and private wells) and soil testing along the proposed route and, using this baseline data, conduct post-operation groundwater and soil testing to evaluate possible impacts from pipeline operation.

The Durham Township Board of Supervisors has also requested that PennEast implement an escrow system to properly compensate the municipalities affected by heavy equipment and other devices that may cause damage to the existing infrastructure. To date we have not had a response. We request that FERC, if granting a permit, make this item a condition of approval in all municipalities that the pipeline transverses.

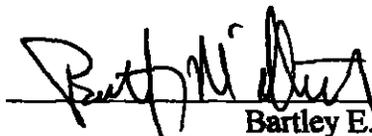
The Durham Township Board of Supervisors would also like to formally request the attendance of a FERC representative at an upcoming township board meeting to address any remaining questions that we may have to resolve. Our board meetings are held on the 2<sup>nd</sup> Tuesday of every month at 7:30PM in our township building.

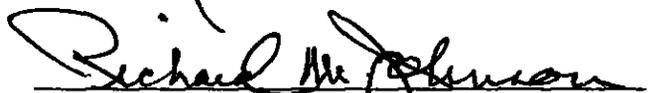
Since the early 1990's Durham Township, its Supervisors, councils, associations and committees have taken great strides to identify and protect the resources of rural Bucks County and Durham Township. Durham Township Supervisors conclude that the proposed PennEast pipeline may have an adverse effect on the resources of Durham Township, during construction, after the pipeline installation and while the pipeline is maintained in perpetuity.

We appreciate your consideration of our comments.

Sincerely,

**TOWNSHIP of DURHAM  
BOARD OF SUPERVISORS**  
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610-346-8911

  
Bartley E. Millett, Chairman

  
Richard M. Johnson, Vice Chairman

Cc: Lawrence Godlasky, PennEast Pipeline  
Delaware River Basin Commission  
US Congressman Mike Fitzpatrick  
PA State Senator Robert Mensch  
PA State Representative Marguerite Quinn  
Bucks County, PA Commissioners  
Bucks County, PA Planning Commission

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