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November 19, 2015

Electronically Filed

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426

Re: Review of Final Environmental Assessment
Proposed Dominion Transmission, Inc. New Market Project
OEP/DG2E/Gas Branch 4
Docket No. CP14-497-000

Dear Secretary Bose:

We are special counsel to the Town of Minden in Montgomery County, New York (the "Town"), the host community for the existing Brookman Corners Compressor Station for which a major expansion is proposed as part of the above-referenced New Market Project ("Project"). We are submitting these comments, along with the attached comments from the Town's special environmental engineering consultant, Barton & Loguidice, D.P.C. ("B&L"), on the Environmental Assessment ("EA") prepared by FERC staff. As set forth below and in the B&L comments, it is the Town's position that the EA should be amended to address the comments and assure that the likely environmental impacts of the Project are fully mitigated before Federal Energy Regulatory Commission ("FERC") can issue a Finding of No Significant Impact ("FONSI").

The Town will be reviewing the Brookman Corners Compressor Station under its applicable land use laws as well as the New York State Environmental Quality Review Act ("SEQRA"). Notwithstanding these comments, the Town reserves its right under local laws and

SEQRA to impose conditions on the compressor station as required for compliance with those laws and consistent with federal laws and regulations. These comments are submitted in the interest of avoiding any potential conflict with FERC's ultimate determination and are offered with the goal of the approval of the Project that fully mitigates any potential significant impacts.

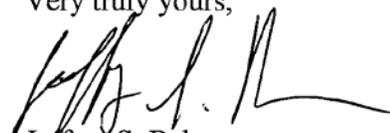
An issue of primary concern for the Town is the reduction of potential air emissions and the avoidance of noise impacts to the neighborhood. The best way to achieve that result is the elimination or reduction of the combustion sources. The EA gives strikingly short shift to this issue in the Alternatives section. While the EA states that electric motors are not feasible for the Horseheads and Sheds Stations because of the lack of a proximate high voltage transmission line, there is no discussion of the Brookman Corners station. As noted in the B&L comments (and as noted at p. 48 of the EA) the site is bisected by a high voltage electric transmission line. Nevertheless the EA is silent on considering that alternative. And while the EA discusses the use of gas turbine-driven compressors in lieu of reciprocating units at Brookman, there is no discussion about using electric motors to power the reciprocating units.

The EA makes the surprising and unsupportable claim that even if the compressor stations were switched to electric power, the resulting lowering of air emissions locally would result in increased emissions at the point of electric generation (EA p.110). Besides the fact that the EA contains no analysis supporting that conclusion, it is clear such a position is factually and legally wrong. It is presumptuous to assume that any electricity generated to power motors at the compressor stations would have equal to or greater emissions than individual on-site combustion sources. According to the U.S. Energy Information Administration, for August 2015 (the latest month for which information is available) over 50% of the electricity generated in New York State came from zero-emission sources (nuclear, hydroelectric and other renewable sources). Another approximately 47% of the power was generated from natural gas-fired generators. <http://www.eia.gov/state/?sid=NY#tabs-4>. Furthermore, it is axiomatic that there are far more efficient emission controls on major natural gas-fired electrical generating stations than are present on smaller local combustion sources. Finally, FERC has not compared localized impacts from air emissions as compared to the marginal impact on regional air quality from major generating stations that are likely located far from the Town of Minden.

Besides reducing emissions, electric powered motors are also likely to result in lower noise levels from the compressor equipment, further mitigating potential adverse impacts.

Considering the foregoing, the Town urges FERC to reconsider the alternative of mandating the use of electric motors at the Brookman Corners Compressor Station and that FERC consider and respond to the comments from B&L before issuing a certificate for this project.

Very truly yours,



Jeffrey S. Baker

cc: Town of Minden