



August 14, 2013

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: Tennessee Gas Pipeline Company, L.L.C., Docket No. CP11-161-000
Northeast Upgrade Project – Mountain Road, Montague NJ and High Point State Park

This is a report detailing the aftermath of a major rain event that occurred from Thursday August 8th into Friday August 9th. DRN field visits were conducted on August 10th and 11th to 27 different sites located along TGP's NEUP pipeline where DRN has landowner permission to walk adjacent the ROW or where the pipeline cuts across public lands. This report contains photos from several locations that show the conditions more than 30 hours or up to 48 hours after the rain had stopped.

The first site visited was Mountain Road in Montague, NJ and the following album; <https://picasaweb.google.com/lh/sreDIR?uname=105703332397473503863&target=ALBUM&id=5911212345185180065&authkey=Gv1sRgCL7Vq-bXxqTyYw&invite=CPPwhqkO&feat=email> contains images taken on August 10th on or near Mountain Road and the Waterbodies and Wetlands south of that location. Previous reports have detailed problems encountered at Mountain Road and the series of first order tributaries, springs and wetlands along the bottom of the mountain that flow perpendicular to the pipeline ROW. Many of these problems have yet to be resolved effectively.

The first photo is of fresh sediment deposits found in the unnamed tributary downstream from the ROW on River Road, 41°19'37" N 74°45'42" W. DRN has been monitoring sediment buildup at this location for several months. DRN has also been monitoring the conditions along the pipeline ROW upstream of this stream. Photo 2/16 shows just one of the several sump pits along this section of the ROW that has overflowed during rain events. Photos 3/16, 4/16 shows fresh hay spread over the mud heading towards the wetland that feeds the fore mentioned stream. DRN staff observed these condition previously at this location and appears the sump pits are dug out by machines, but only after a rain event overwhelms them spilling over with sediment laden water flowing towards the wetland. TGP has addressed the many problems along this section but fail to mention these off ROW occurrences that may be the cause of sediment buildup in this unnamed tributary of the Delaware River.

Photo 5/16 is the ECD at the end of Mountain Road, a township road and TGP's access to the ROW. DRN has compiled documentation of runoff problems at this location since April 2013. Photo shows multiple layers of ECD's with the inner most silt fence filled up with rock and debris to the top. TGP had the road area cleaned and hay spread by the time of our field visit, but this location is a continual problem

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during rain events even with the multiple ECD's implemented. Photo 6/16 is the storm drain at the intersection of River Road that is the recipient of the runoff from the ROW on Mountain Road (AR 30.01). TGP had just wrapped the edge of the storm drain with sediment fabric but does nothing to stop the flow of muddy water entering the drain. Photo 7/16 is of the drainage ditch across River Road from the storm drain filled with sediment, which now causes water to run into the homeowner's garage.

The following photos are of the individual waterbodies and wetlands along the base of the mountain. DRN has reported on numerous issues here including but not limited to inadequate and missing resource signage back before tree felling. Photo 8/16 is S105 that is an overflow from a springhouse that's located on the Merusi property that has been dry since grading and blasting has taken place along this section. This was about the same time Mr. Merusi's well water at his residence got fouled and now needs a filter system provided by TGP. The overflow water in S105 is now a green stagnant breeding hole for mosquitoes even after the major rain event that overflowed the ECD's at Mountain Road. Photo 9/16 shows the second stream in order S106 completely dry and is delineated as an isolated resource not flowing across the ROW that was documented by DRN before construction activity started. Photo 10/16 shows S107B completely dry 24 hours after the rain event that's one of two streams (S107A) that feeds S107 a pond that supplies water to a nursery. As seen in photo 11/16 a large amount of sediment still entered the pond. This pond has a diverse population of fish and amphibians and is favorable habitat for endangered bog turtles. S108 was also dry and is included along this stretch where TGP has already blasted the trench line coinciding with these streams losing their flows even after this major rain event and extremely wet summer. Photo 12/16 is the ECD's at S113 and multiple layers of controls that still allow sediment to reach the stream. Although there is evidence that machines removed some of the sediment build-up, the photo highlights the large amount of mud that ran off the ROW during this rain event. The large amount of sediment and runoff is a concern that needs to be addressed. Photo 13/16 shows improperly staked hay bale knocked over below the multiple layers of ECD's located above and left in that condition. Photo 14/16 is a fresh sediment deposit left below the overtopped ECD's. Many of these issues have been brought up in the past and should have already been properly addressed by this point in time. Until then, they will continue to cause problems especially after rain events.

The last two images from the album were taken in High Point State Park and show the lack of stabilization on the steep slopes off of Sawmill Road where the pipe has been buried for over a month and the negative impact high water has had on the stabilization of the bank next to Big Flat Brook S005. Thank you for your time and attention to this matter.

Best,
Joe Zenes

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Cc. Cliff Lundin, Sussex County Conservation District
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