



SOME SUGGESTED TALKING POINTS

NJDEP Underground Storage Caverns rules at N.J.A.C. 7:1F

<http://www.nj.gov/dep/rules/proposals/proposal-20220516a.pdf>

The risks are too great for New Jersey to permit cavern storage of fossil fuels. The rulemaking should prohibit underground cavern storage of all petroleum gasses and their derivatives, in addition to the proposed prohibition of cavern storage of Liquefied Natural Gas (LNG).

Why? Because petroleum gasses are highly flammable, can cause explosion or fire, release air pollution, and cavern storage poses serious environmental impacts while New Jersey:

- Most densely populated state in the nation
- Highest number of superfund sites in nation
- Legacy and continuing problem of environmental contamination, including water, air and ecosystems
- Plethora of overburdened communities in harm's way
- Urgent need to reduce fossil fuel infrastructure/GHG emissions

The Proposed Rulemaking is Fatally Flawed:

- Sidesteps climate change impacts
- Avoids considering environmental justice community impacts
- Lack of exclusion zones or buffers
- Overly broad definition of liquefied petroleum gas (LPG)
- Overly narrow consideration of what's regulated
- Lack of limits of cavern expansion, leading to segmentation of project review
- No upstream/downstream environmental considerations: ignoring related project infrastructure such as transport in and out of cavern system; operation and maintenance impacts; pipelines; air emissions; full life cycle analysis of petroleum products, etc., leading to piecemeal or lack of review or assessment of ancillary environmental impacts
- Lack of specificity of "environmental inventory" items – specifically what does an Environmental and Health Impact Statement (EHIS) consider beyond the broad categories listed (page 24); what is an "environmental receptor" and how far does the inventory of receptor extend (page 26)?
- Lack of robust public input process; limits on public access to information