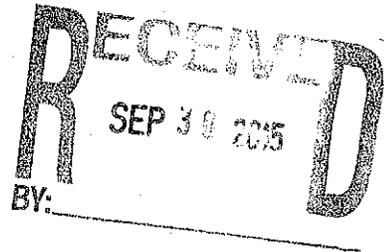




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September 29, 2015

Attn: Sarah Porter, Conservation Agent
Town of New Bedford Conservation Commission
133 William Street, Room 301
New Bedford, MA 02740

**RE: Algonquin Gas Transmission, LLC
Line G-3 System Pipeline Immediate Repair Condition Anomaly Investigation Project
Utility Maintenance Notification**

Dear Commissioners:

Algonquin Gas Transmission, LLC ("AGT" or "Algonquin"), an indirect wholly owned subsidiary of Spectra Energy Transmission, LLC ("Spectra") is responsible for maintaining the structural integrity and ensuring the safety and reliability of its natural gas pipeline systems; accordingly, AGT routinely monitors, inspects, and maintains their pipelines in order to maintain compliance with the United States Department of Transportation ("USDOT") rules governing pipeline safety.

In order to monitor their pipelines, AGT typically uses internal pipeline inspection tools commonly known as "pigs". These pipeline pigs are inserted into the existing pipeline and perform various functions, including data collection as they pass through the pipe. During a recent "pig" run or tool run, AGT identified two locations ("pipeline anomalies") in New Bedford that require immediate investigation and repair. Repairs classified as "immediate" are those that pose a significant threat to public health and safety. Common examples of such anomalies include a loss of metal pipe wall thickness of greater than 80% and/or dents on the top of the pipeline in conjunction with metal loss or evidence of cracking. According to federal pipeline safety regulations, such anomalies must be examined and repaired within five days of discovery.

The sites identified are located along Algonquin's Line G-3 pipeline system. Locations are provided on the attached mapping. AGT has initiated a mandatory pressure reduction on the pipeline in accordance with federal safety regulations which will remain in effect until the pipeline repairs are completed. The necessary repairs were initiated during the week of September 28th, 2015.

Both sites require equipment access and excavation within and adjacent to areas under the jurisdiction of the New Bedford Conservation Commission ("NBCC") and the New Bedford Wetlands Ordinance. Although the proposed work will occur within regulated areas, per Section 3 (Exceptions) of the New Bedford Wetlands Ordinance, an application and permit under the Ordinance is not needed for the required pipeline repair work as it is for "...maintaining, repairing, or replacing, but not substantially changing or enlarging, an existing and lawfully located structure or facility used in the service of the public to provide electric, gas, water, telephone, telegraph, or other telecommunication services...". This work is also an emergency maintenance concern. This letter serves as the required notification to the New Bedford Conservation Commission under the Section 3 exception for repair and maintenance of existing essential public services such as gas lines. Due to the urgent nature of the required repairs and relevance to public safety, the repair work on the G-3 line in New Bedford has commenced and will continue until completed. Work is expected to take approximately 2-3 days to complete per site.

Under the Massachusetts Wetlands Protection Act ("WPA"), the proposed repair work is also exempt under the WPA "utility maintenance provision" since the work will be conducted "...to maintain, repair or replace, but not substantially change or enlarge an existing and lawfully located structure or facility used in the service of the public and used to provide electric, gas, water, telephone, telegraph and other communication services, provided said work utilizes the best practical measures to avoid or minimize impacts to wetland resource areas outside the footprint of said structure or facility..." (310 CMR 10.02(2)(a)(2)).

None of the proposed work is located within mapped Priority or Estimated Habitats as identified by the Massachusetts Natural Heritage and Endangered Species Program ("NHESP") under the Massachusetts Endangered Species Act ("MESA").

Proposed Work Description

At each anomaly site, the pipeline will be excavated to a width and depth adequate to be investigated and repaired. During excavation, topsoil will be segregated from subsoil to help maintain a native seed source during revegetation. Typically, each excavation will measure approximately 30'(L) x 20'(W) x 10'(D) and will be completed within a contained workspace. Workspace located adjacent to the excavation is necessary for equipment staging, temporary stockpile storage and vehicle parking. All workspace will be located within AGT's maintained pipeline right-of-way easement ("ROW") and will not require any tree clearing as the pipeline ROW is already clear. The following is a general construction sequence for the anomaly investigation and repair work:

1. Implement traffic controls as necessary;
2. Implement erosion controls as necessary;
3. Excavate at anomaly site and implement dewatering BMP's as necessary;
4. Clean off the pipe;
5. Investigate the anomaly visually and repair, sandblast, and re-coat the pipe as needed;
6. Backfill the excavation;
7. Restore the site to preconstruction conditions, including seeding all previously vegetated, disturbed areas in accordance with Erosion and Sedimentation Control (E&SC) Plan and;
8. Remove perimeter erosion control barrier as necessary after the site has been stabilized.

Construction equipment will access the existing pipeline ROW from the nearest roadway. The necessary equipment will then travel down the existing pipeline ROW to the repair sites. All access ways and work areas required to complete the maintenance activities within wetland resource areas and associated buffer zones will be temporary. Timber construction matting will be used as necessary to construct temporary access ways within wetlands. Timber mats function to spread out the weight of equipment and limit rutting and compaction of saturated wetland soils. All matting shall be removed immediately following the completion of repair work.

Mitigation Measures

AGT will implement the E&SC Plan for all construction activities. AGT routinely conducts maintenance on its facilities within, or adjacent to, wetland resources and is confident, based on past experience, that the measures specified in the E&SC Plan will effectively minimize any potential adverse impacts to the environment.

New Bedford Conservation Commission
September 29, 2015

AGT's E&SC Plan has been prepared for use by AGT and its contractors as a guidance manual for minimizing erosion of disturbed soils and transportation of sediments off the ROW and into natural resources (wetlands, streams, and residential areas) during natural gas pipeline construction and maintenance activities. The procedures developed in the E&SC Plan, which represent AGT's BMPs, are designed to accommodate varying field conditions while maintaining rigid minimum standards for the protection of environmentally sensitive areas.

The E&SC Plan is designed to provide specifications for the installation and implementation of soil erosion and sediment control measures while permitting adequate flexibility to use the most appropriate measures based on site-specific conditions. The intent of the E&SC Plan is to provide general information on the pipeline construction process and to describe specific measures that will be employed during and following construction and maintenance to minimize impacts to the environment.

The goal of the E&SC Plan is to preserve the integrity of environmentally sensitive areas and to maintain existing water and resource quality by implementing the following objectives:

- Minimize the extent and duration of disturbance;
- Protect sensitive resources from erosion of exposed soil by diverting runoff to stabilized areas;
- Install temporary and permanent erosion control measures; and
- Establish an effective inspection and maintenance program.

A copy of AGT's E&SC Plan is available upon request.

Preemption Statement

Notwithstanding anything to the contrary set forth in this correspondence, nothing stated herein shall be construed to indicate that any state, regional, or local agency referred to has the power to impose any requirement inconsistent with Federal law or to refuse to issue or to unreasonably delay the issuance or processing of any state, regional, or local permit, license, certificate, approval, review, or other requirement; nor shall this correspondence be construed to limit AGT's legal rights under the Natural Gas Act (15 U.S.C. § 717, *et seq.*), Pipeline Safety Act (49 U.S.C. § 60,101, *et seq.*), or the United States Constitution, including, but not limited to, the Supremacy Clause and Commerce Clause.

On behalf of AGT, TRC is providing this courtesy notification to the NBCC and appreciates your attention to this matter. If you have any questions, please do not hesitate to contact me at (207) 274-2608 or via email at dbrenneman@trcsolutions.com.

Regards,

TRC Environmental

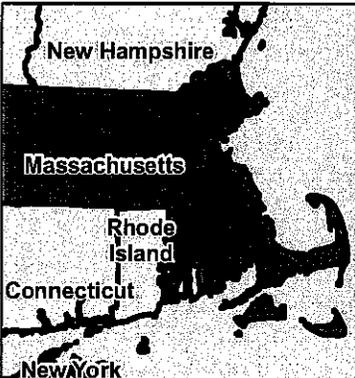


David Brenneman
Wetland Scientist

Enclosures (2)
CC: File

ATTACHMENT A

USGS Topographic Locus Map



- ★ Calibration Dig
- ★ Immediate Repair Anomaly
- G-3 System
- Algonquin Natural Gas Pipeline
- USGS 24K Quadrangles
- Town Boundary

Sources: BING, ESRI, SPECTRA, USGS
 Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001 Feet

Spectra Energy
 Partners
 Algonquin Gas Transmission, LLC

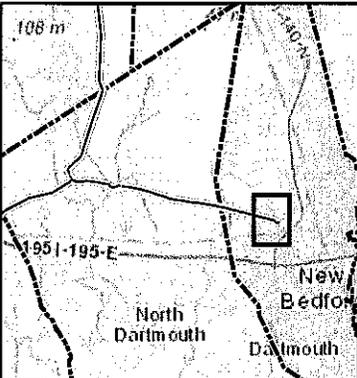
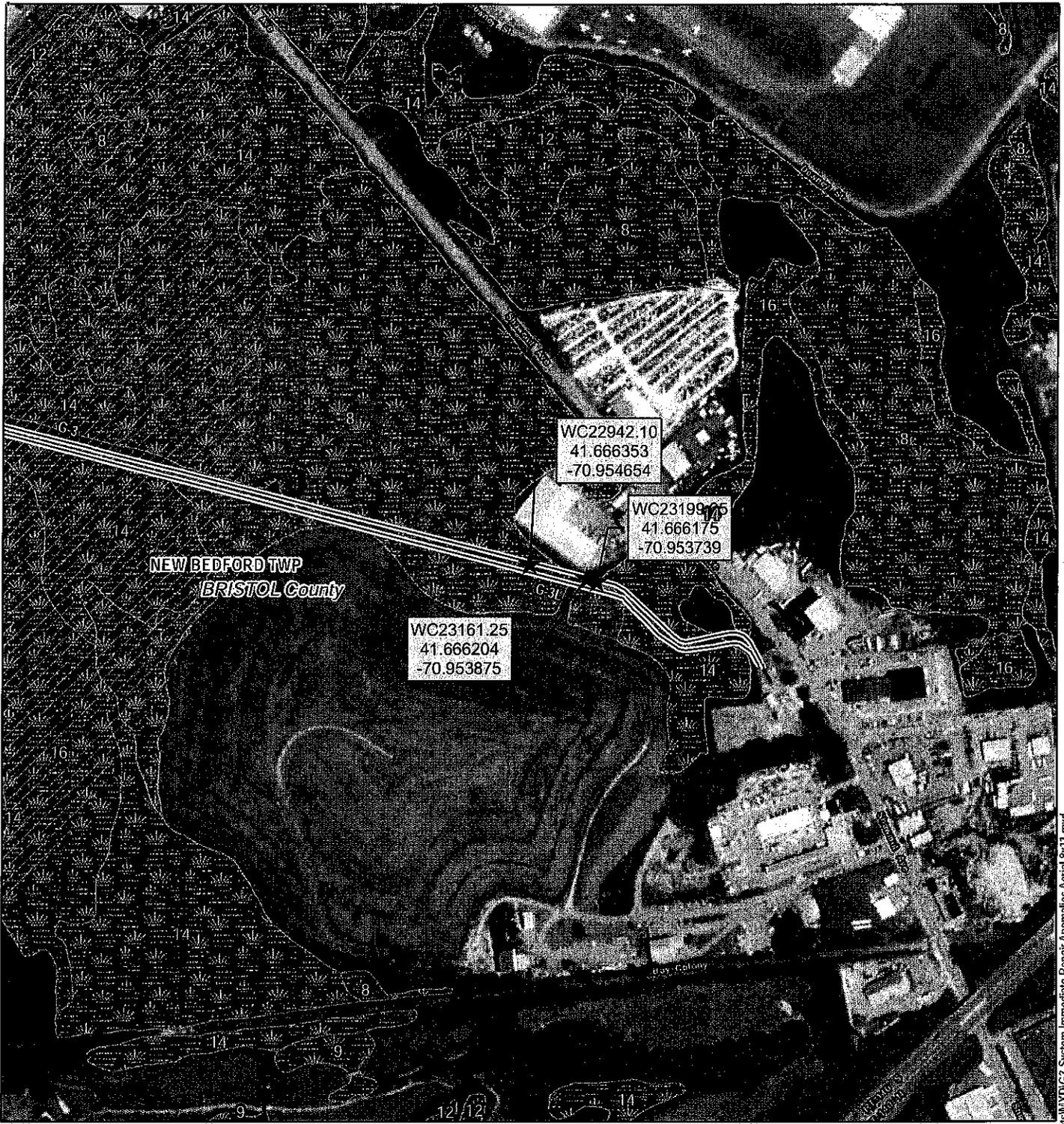
G-3 System
 Immediate Repair Anomalies
BRISTOL COUNTY
 USGS 24K Quadrangle Map

Created by: **CTRC** 9/29/2015

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ATTACHMENT B

Aerial Plans



★ Calibration Dlg	▨ NHESP Natural Community
★ Immediate Repair Anomaly	▨ NHESP Est. Habitat
— G-3 System	▨ NHESP Pri. Habitat
— Algonquin Natural Gas Pipeline	
— Town Boundary	
▨ MADEP Wetlands	
— MADEP Stream	

Sources: BING, ESRI, SPECTRA, USGS, FEMA
 Coordinate System: NAD 1983 StatePlane Massachusetts Mainland FIPS 2001 Feet

Spectra Energy
 Partners
 Algonquin Gas Transmission, LLC

G-3 System
 Immediate Repair Anomalies
 New Bedford TWP
 Bristol County
 Page 1 of 1
 Aerial Map

Created by: **CTRC** 9/29/2015

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