**ISSUE: DEIS BASED ON ESTIMATES WHEN ACTUAL MEASUREMENT DATA IS POSSIBLE**

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Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101) and I am concerned that FERC relied on the reporting of air emissions from estimates and modeling while dismissing suggestions from commenters that they consider requiring actual measurements of air emissions and methane leaks from one or more of Williams/Transco’s operating Solar Mars 100 compressor stations to inform the analysis of downstream emissions from the proposed CS206.

On page 4-290 in the DEIS, FERC staff wrote: “Because emissions estimates are specific to operational conditions (emissions reductions technologies and station design/configuration/mitigation), an analysis of Compressor Stations 515 for comparison purposes would not provide meaningful information for the NESE Project. Further, the Commission reviews each project on its own merit; therefore, we decline to require an analysis of Compressor Station 515.”

Of note: Comments to FERC indicated that actual measurements could be obtained from any of the Solar Mars 100 units operated by Williams/Transco.

Of note: State air quality permit monitoring and reporting requirements for air pollution at other sites with Solar Mars 100 units should be available as sources for data for FERC to use to independently validate estimates and modeling results that were provided by Williams/Transco.

Of note: The specifications provided to Williams/Transco from Caterpillar about emissions for their other stations with Solar Mars 100 units contains information pertaining to emissions reductions technologies as well as information about elevation, humidity and temperature that was supplied for Compressor Station 206. The station design/configuration/mitigation operational conditions for other Solar Mars 100 units should be readily available in documents about those projects on the FERC dockets to allow for a more robust validation of the estimates upon which FERC asserted that “ … construction and operation of the Project would not have a significant impact on air quality …” (DEIS, page ES-7)

Of note: Compressor stations leak excessively more than what is reported by pipeline companies as was found in a recent study by Damascus Citizens for sustainability (January 26, 2017):   
<http://www.damascuscitizensforsustainability.org/2017/01/methane-plumes-downwind-natural-gas-compressor-stations/>

Declining to require (or review) actual measurements from another Solar Mars 100 compressor station with consideration given to differing operational technologies indicates a lack of independent verification of data supplied to FERC by Williams/Transco and, as such, leads to a lack of credibility of the DEIS.

Without verifying the accuracy of emission estimates by having actual measurements taken at other Solar Mars 100 units, I am requesting that the Commission require actual on-site measurement of emissions at the proposed Compressor Station 206 site as well as measurement of methane leaks from associated pipelines for the life of the Compressor Station 206 if it is built.