**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 writing because FERC dismissed comments that requested actual measurements of emissions and methane leaks at other pipeline facilities with Solar Mars 100 units to help inform and verify the analysis of estimated and modeled emissions reported by Williams/Transco for their proposed Compressor Station 206. Comments to FERC indicated that actual measurements could be obtained from any of the Solar Mars 100 units operated by Williams/Transco. Rather than independently validating the reported and modeled emissions, FERC staff concluded that construction and operation of the Project would not have a significant impact on air quality by relying on modeling and estimates.

Williams/Transco operates several Solar Mars 100 units, and State permitting requirements include monitoring and reporting requirements that could be a source for some of this data. Since Caterpillar provided specifications to Williams/Transco that are in NESE documents on the FERC docket, the applications to FERC for their other Solar Mars 100 units should have included specifications of emissions reductions technologies and station design/configuration/mitigation that could be used in a “comparison” that could serve to verify reported estimates and modeling results.

Additionally, verification is important since compressor stations leak excessively more methane than what is reported by pipeline companies as was found in a recent study by B.F. Payne Jr. et al. (2016). Characterization of methane plumes downwind of natural gas compressor stations in Pennsylvania and New York. (0048-9697/c 2016 Published by Elsevier Ltd.) Accessed from [http://dx.doi.org/10.1016/ j.scitotenv.2016.12.082](http://dx.doi.org/10.1016/%20j.scitotenv.2016.12.082)

Thus, I take issue with FERC staff’s response (on page 4-290 in the DEIS): “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.”

Independent verification is something that FERC is tasked to do as they prepare an Environmental Impact Statement. It does not appear that this has been done for emissions from the proposed Compressor Station 206.

In conclusion, I am encouraging FERC to reconsider the response noted above and do a more credible independent review and analysis of the emissions and methane leaks associated with Compressor Station 206 and its associated pipelines. Additionally, to add credibility to the Environmental Assessment, FERC should 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.