

Northeast Supply Enhancement (NESE) Project is a Public Threat – not a Public Convenience

Risks to Water Supply and Groundwater

Construction of the NESE Project could reduce the capacity of wetlands to buffer flood flow and control erosion. There was no factual determination by Williams/Transco that their Erosion and Sediment Control Plan would ensure that ground or surface water would not be degraded.

Both the Compressor Station 206 and Madison Loop are considered to be “major developments” under the Stormwater Management rules, and the entire NESE Project needs to be in compliance with the Stormwater Management rules.

Related NJ-Specific Concerns:

- In New Jersey, the year 2018 had more precipitation than in any other year since record-keeping began in 1895.
- In New Jersey, efforts have slowly improved water quality of our rivers, lakes and other bodies of water since the 1972 Clean Water Act, but current reports indicate that 65% of these waters cannot support drinking water supplies, 75% can't be used for recreation, and 85% can't support aquatic life.

Source: *Surface Water Quality- Rivers and Streams: Chemical and Physical Measurements - Updated 8/2017 Environmental Trends Report NJDEP, Division of Science, Research, and Environmental Health.* Retrieved from <https://www.nj.gov/dep/dsr/trends/surfacewater-physical.pdf>

Flooding at CS206 site:

- Site has flows into Carters Brook and other streams that empty into the Millstone River which goes to the Raritan River (a drinking water source).
- Millstone Watershed is impaired already, and no new construction can impair it further.
- Flooding at CS206 could impact the plumes of contaminated groundwater at Higgins Farm Superfund Site – There's no certainty about groundwater mounding & potential modification of contaminated plumes at the Higgins Farm Superfund Site.
- Removal of 16.6 acres forested land at the CS206 site creates lost benefit of absorbing stormwater & pollutants. Recovery of forested areas that are not permanently removed could take 50+ years.
- Plan for a bioretention basin at CS206 site is on subsoil that is not sufficiently permeable – The groundwater table here is high, and bedrock is found shortly below ground level.
- The plan for the bioretention basin will lead to periodic inundation which would likely result in stagnant standing water > optimal condition for mosquito breeding. It's doubtful that this could meet Stormwater Best Management Practices where there cannot be standing water after 72 hours.
- Based on the depth of the proposed basin, the proposed facility will require that it be classified as a Class IV Dam, in accordance with New Jersey Dam Safety Regulations. The dam height for the proposed basin is 7 feet. Class IV dams have a spillway design storm of the 24 hour 100-year frequency Type III storm plus 50 percent.

Though it is not a definite plan, Trap Rock Quarry is a potential future reservoir (after 2040) in the State's Master Water Plan. Airborne toxic emissions could hinder the feasibility of using water for drinking from that.

Construction at Madison Loop:

- The Madison Loop would go through areas with acid-producing clay soil. Earth-moving activities, such as those associated with the NESE Project, can expose these clays to the air. Upon exposure, the sulfide minerals in the clays oxidize and produce sulfuric acid. Disrupting this would make it difficult to stabilize and restore the area and slope stability, also impacting nearby wetlands and surface waters. Additionally, low pH soils are more corrosive to pipelines.
- Construction of the Madison Loop is planned to go through or near other toxic sites –
 - a. Road Department Garage Area 3-1 near MP 9.5;
 - b. Global Sanitary Landfill less than 0.1-mile south of MP 10.13 to 10.38 of the Madison Loop which is an NJDEP Classification Exception Area (CEA) which also acts as a Well Restriction Area (WRA);
 - c. E.I. Dupont Denemours & Co. site with groundwater known to contain VOCs and metals that is currently being remediated in areas of the Madison Loop; and
 - d. Morgan Ordnance Depot north of MP 11.10 of the Madison Loop that may have contaminated soil and unexploded munitions.
- The Madison Loop is planned to cross eighteen (18) wetlands. Of these, six (6) are classified as “exceptional” resources, two (2) are “ordinary”, and ten (10) are “intermediate”.
- Potential sediment disruption from construction in and around the inland tidal wetland areas of the Madison Loop adjacent to Cheesequake Creek could increase the potential for growth of harmful algal blooms (HABS). There were no studies or modeling presented that could justify the assertion of Williams/Transco that they would minimize sediment disruption here.
- Horizontal Directional Drilling (HDD), which has the highest likelihood of drilling fluid releases, would impact the wetlands on the Madison Loop. One HDD entry point at Milepost 11.48 is in an “exceptional resource value wetland” within 30-feet of a tidal stream. Soil compaction from construction vehicles is made worse by dewatering, and dewatering would likely be needed at this site. Additionally, HDD failures are known to happen, as was found with Williams/Transco's Leidy to Long Island Expansion Project in NJ.