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September 6, 2007

VIA EMAIL AND HAND DELIVERY

Daniel F. Caruso
Chairman
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

RE: Petition No. 815 – Iroquois Gas Transmission System, L.P. Petition for a Declaratory Ruling that the Connecticut Siting Council has an Advisory Role to the Federal Energy Regulatory Commission Regarding Iroquois's 08/09 Expansion Project in Brookfield, Newtown, and Milford, Connecticut

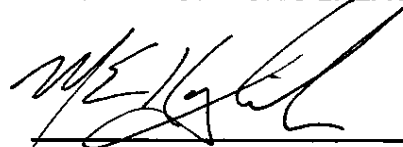
Dear Chairman Caruso:

On behalf of Iroquois Gas Transmission System, L.P. ("Iroquois"), enclosed are an original and twenty (20) copies of Iroquois' responses to the Connecticut Siting Council's pre-hearing interrogatories issued on August 21, 2007.

Please contact me with any questions concerning this filing.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP



Michael E. Kozlik

Enclosures

cc: Francis J. Collins, Esq.
Thomas W. Beecher, Esq.
John Haines, Esq.
Jeffrey A. Bruner, Esq.
Paul W. Diehl, Esq.

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Q-CSC-1

Has Iroquois met with municipal officials from Milford, Newtown and/or Brookfield regarding the proposed project?

RESPONSE:

As part of the planning of the project, Iroquois met with:

Milford:

3/1/2007 - Met with Mayor James Richetelli
5/3/2007 - Open House held, municipal officials invited

Newtown:

2/27/2007 - Met with 1st Selectman Herb Rosenthal
4/23/2007 - Open House held, municipal officials invited

Brookfield:

2/27/2007 - Met with 1st Selectman Jerry Murphy
5/1/2007 - Open House held, municipal officials invited

In addition to the foregoing meetings, Iroquois has met with local first responders as stated in the response to Q-CSC-6.

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Q-CSC-2

If approved, would construction of the proposed Brookfield Compressor Station (as part of the 08/09 Expansion Project) begin following the completion of the approved Brookfield Compressor Station (that was part of the MarketAccess Project)?

RESPONSE:

Yes. Construction for the MarketAccess Project is currently scheduled to begin early civil work (clearing and grading) in October 2007, with main construction to begin in April 2008 and to be completed by November 2008.

Construction for the 08/09 Expansion Project is currently scheduled to begin in April 2009 and to be completed by November 2009.

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Q-CSC-3

What is the width of the existing Iroquois easement in Newtown?

RESPONSE:

Iroquois' existing permanent easement is fifty (50) feet wide.

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Q-CSC-4

Describe the difference between “temporary workspace” and “additional temporary workspace.”

RESPONSE:

Temporary workspace refers to the normal workspace requirements to install a natural gas pipeline.

Additional temporary workspace refers to extra workspace space required in addition to temporary workspace at specific locations which could include public road and waterbody crossings, hydrostatic test locations, crossovers, tie-ins, and staging/fabrication of pipeline sections.

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Q-CSC-5

Describe in detail the specific safeguards that Iroquois has incorporated into its existing procedures, programs and equipment, to minimize the chance of the documented incidents occurring at the any of the proposed Connecticut facilities. Include in your response 'lightning' protection safeguards that will be included in the design of the proposed sites and surrounding areas.

RESPONSE:

Some, but not all, of the specific safeguards are described below. However, much of the system description is contained in: (i) the "Hazard Identification Analysis for Brookfield Compressor Station," dated April 20, 2006, prepared by Kiefner and Associates, Inc., which was provided to the Council on May 16, 2006, and designated as Iroquois Exhibit 3.d. in Petition No. 755A (the "Kiefner Report"); and (ii) the May 2007 Addendum to the Kiefner Report, which was provided to the Council on July 18, 2007, as an attachment to the Response of Iroquois Gas Transmission System, L.P. to Scoping Comments. The proposed Connecticut Facilities will be designed, constructed, operated and maintained in strict accordance with U.S. Department of Transportation, Title 49 of the Code of Federal Regulations, Part 192: "Transportation of Natural or Other Gas by Pipeline: Minimum Safety Standards." These safety regulations are augmented by the corporate practices of Iroquois. The effectiveness of the regulations and Iroquois practices in providing reliable and safe facilities is illustrated by the fact that there has not been any equipment failures on company facilities that have resulted in property damage or personal injury to date.

Iroquois will use current industry standards when designing the lighting protection system to ensure it adequately protects the facilities and environment. The design may includes items such as grounding rods, isolation barriers, polarization cells, and other equipment as needed.

Q-CSC-6

Provide details of training sessions that have or will be provided to the Towns of Newtown and Brookfield and the City of Milford emergency services and specify any additional scope of training that will be included to deal with the proposed project.

RESPONSE:

On November 16, 2006, Iroquois hosted its annual Emergency Responders meeting for the communities and agencies along the pipeline in Connecticut. All emergency response agencies were invited. Town fire companies, local police departments, fire marshals, town emergency managers were all invited along with mutual aid agencies and emergency medical responders. State pipeline regulators were also present at this meeting. At this meeting all attendees were given a presentation on:

- Natural Gas Transportation Safety
- Industry Prevention Measures
- Pipeline Security
- Characteristics and Hazards of Natural Gas
- Right of Way Warning Markers and Information Markers
- Excavator and Homeowner Responsibilities
- Pipeline Leak Recognition
- Pipeline Emergency Response
- Location and identification of facilities
- Safety and integrity systems of Iroquois facilities
- Communication protocols with emergency responders
- Iroquois control center operations and communication protocols
- Iroquois' supervisory control and data acquisition system
- Qualifications and training of field staff

At the meeting Iroquois invited all agencies and departments to schedule a tour, or further training. Two local area fire departments, Stevenson and Monroe (both mutual aid for Newtown) took advantage of this opportunity. Additional training for the rank and file members was held at the Stevenson Fire House. These additional training sessions have been offered to the communities affected by the proposed expansion. With respect to compressors additional training would include the capabilities and redundancy of various compressor station safety systems, the operation of a compressor station, response expectations of emergency responders, local station control systems and capabilities, and control center operations.

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This year, with the proposed expansion on facilities in Brookfield and Milford, Iroquois has been reaching out to the emergency responders in these affected communities. Iroquois has met with the assistant fire chief in the City of Milford. Based on this meeting Iroquois has decided that because emergency response in the City is covered by a 100% professional force, a separate meeting will be held in Milford during normal work hours.

This meeting will be held on or around November 12, 2007, and all emergency responders in Milford, Shelton and Stratford will be invited. As a follow up to this meeting, more focused meetings will be held for the different shifts at the Milford Fire Company. These meetings will take place over the winter at the convenience of the Fire Company. Similar offers will be made to any other agencies in the City.

The following day a meeting and presentation covering the same topics will be held at the Stony Hill Inn in Danbury CT. All emergency responders will be invited.

Iroquois has been meeting with the emergency responders in Brookfield and working with them in their effort to revise their Emergency Action Plans. Iroquois has met with the Brookfield Fire Chief and is working with him to schedule focused meetings with the Brookfield emergency responders as described above.

Q-CSC-7

Describe the monitoring and containment provisions that will be incorporated in the design of the project to detect a potential spill of oil during operation of the facilities, given the large volumes of lubricating/cooling oil circulating within the gas turbine and compressor equipment enclosure, and the oil within the elevated gearboxes associated with the gas cooler structure.

RESPONSE:

All personnel working at the site will receive environmental training which will include spill prevention, containment and control protocols. A major spill kit (55-gallon over-pack) will be on site at all times.

Secondary containment within the compressor building is provided by the design of the building floor and floor drain system. Floor drains in containment areas are directed to waste storage tanks for appropriate disposal. Any release of a liquid to the floor will be isolated from soils and groundwater, and would be effectively contained for recovery.

Regulatory authorities require Iroquois to develop and maintain a comprehensive "Emergency Preparedness Procedure & Spill Prevention Control and Countermeasures Plan" (EPPSPCC) for all permanent facilities. An EPPSPCC plan would be developed for the compressor stations and would be in place prior to operations. This plan would be written to meet the requirements of EPA, 40 CFR Parts 112 265; and OSHA, 29 CFR § 1910.38.

Barrels of turbine lubricating oil may be stored on site with secondary containment. Gear boxes on the gas coolers do not contain oil.

Material of trade (i.e., small containers of oils, solvents, grease and paints) are typically stored in manufacturers' containers and are placed in appropriate storage cabinets.

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Q-CSC-8

Describe what safeguards Iroquois will provide to address the reliability and safety of operation of the proposed equipment, as it regards to hazardous gas and fire detection/suppression provisions. Describe any other area monitoring to detect and alarm in the event of any gas release from outdoor equipment.

RESPONSE:

Iroquois employs gas, fire and heat detection as part of its design for Compressor Stations. These systems are included as part of the safety monitoring system for the compressor building and turbine enclosure. In the unlikely event of a detection of gas in the compressor building or turbine enclosure the Compressor Stations Emergency Shutdown System (ESD) will activate. Some of the actions taken by the ESD system include shutting down the turbine and relieving the pressure in the natural gas piping. If a fire is detected in the turbine enclosure not only will the previous action be taken but a CO₂ system will discharge in the turbine enclosure to extinguish the fire.

Iroquois does not employ gas or fire detection for outdoor equipment. In the extremely unlikely event of a gas leak, the gas, which is lighter than air, would dissipate very quickly. In addition odorant is typically added to natural gas to give it a readily detectable odor which could be detected by personnel when in the area.

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Q-CSC-9

Estimate the number of yearly releases from any scheduled gas venting from each of the proposed facilities, and the quantity of volatile organic compounds (VOCs) released per blow down.

RESPONSE:

We anticipate venting at the proposed compressor stations would be within a typical range of similar facilities on the Iroquois system. As an example, at Iroquois' Dover Compressor Station, from January 2005 to early May 2006, there were eight scheduled and unscheduled blowdowns resulting in 0.35 tons of VOC. Scheduled maintenance activities for valve maintenance at these stations occur once each year and have a minimal effect on overall VOC releases (approximately 0.00004 tons per year).

Q-CSC-10

Are there unscheduled gas venting occurrences? What factors would cause such venting?

RESPONSE:

Unscheduled gas venting is required to make the facility safe. It can be initiated automatically in the control system of the equipment, or manually on site.

Unscheduled gas venting or Emergency Shutdowns (ESD) are unplanned events and can occur at any time for a multitude of abnormal operating conditions.

Typical unscheduled shutdowns that have been experienced infrequently include, but are not limited to:

- Loose wiring on sensors
- Sensor of equipment malfunction
- Valves out of sequence

Other conditions that can cause an unscheduled shutdown and venting include, but are not limited to:

- Flame, gas or abnormal heat detected in the compressor building or compressor package enclosure
- An activated ESD utilizing a push button
- Compressor computer control failure
- Compressor discharge pressure above preset levels

These conditions are rare.

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Q-CSC-11

Please confirm that the proposed project will not include construction of any odorization facilities.

RESPONSE:

Currently, there are no plans to install odorization equipment as part of this project.

Q-CSC-12

Do existing air emissions levels from the Brookfield Compressor Station site (08/09 Expansion Project) include the previously approved Brookfield Compressor Station (MarketAccess Project)? If not, are the expected emissions levels from the MarketAccess Compressor Station included in the proposed 08/09 Expansion Project Compressor Station?

RESPONSE:

Existing background air pollutant concentrations supporting Iroquois' 08/09 Expansion Project permit application and air quality modeling do not include impacts due to emissions from the MarketAccess Project. The most complete available background concentration data represent years up to and including 2006. Operation of the Brookfield MarketAccess facilities has not yet begun to impact background concentrations. Consistent with Connecticut Department of Environmental Protection (DEP) air permitting regulations, air pollutant emissions from the two Brookfield minor source proposals are reviewed and approved separately. However, when the combined expected impacts due to potential emissions from both the Brookfield MarketAccess and 08/09 Expansion Projects are considered together, operations will meet ambient air quality standards as demonstrated below.

To document compliance with air quality standards, the DEP requires applicants like Iroquois to perform cumulative impact analyses for pollutants with potential impacts that exceed "significant impact levels" (SILs) as defined by United States Environmental Protection Agency and DEP regulations. Cumulative impact analyses combine potential facility impacts with impacts from certain off-site sources plus existing background pollutant concentrations for comparison with air quality standards.

Conservative screen models are used to estimate maximum project impacts for comparison with SILs. If maximum screen modeling impacts are less than the corresponding SIL for a particular pollutant and averaging period, then no additional analysis is required to demonstrate compliance with the corresponding air quality standard. The DEP considers such impacts to be insignificant.

Since some of the Brookfield maximum screen model impacts exceed SILs for particular pollutants and averaging periods, Iroquois was required to prepare cumulative impact analyses for both projects. Iroquois was required to use a more refined air pollutant dispersion model, in addition to the screening model, to estimate impacts for pollutants and averaging periods for which SILs are exceeded. For these analyses, Iroquois also was required to request and obtain data from the DEP representing any off-site sources of significant impact pollutants that DEP guidelines require Iroquois to model with its own proposed sources. Iroquois then adds maximum cumulative on-site and off-site impact estimates to existing background pollutant concentrations and compares these sums with corresponding air quality standards. If the cumulative on-site and off-site impacts plus background concentrations are less than the air quality standards, this documents compliance with the standards.

Table CSC-12-1, below, summarizes potentially significant cumulative air pollutant impacts of the Brookfield MarketAccess and 08/09 Expansion Projects as well as background pollutant concentrations. It documents that cumulative impacts, including other off-site sources identified by the DEP, combined with background concentrations, are less than the air quality standards applicable at the time that Iroquois' air permit applications and modeling reports were submitted. Iroquois' MarketAccess air permit was approved in March of 2007. The 08/09 Expansion Project air permit application was submitted in April of 2007.

Table CSC-12-1 Brookfield Station Projects Air Pollutant Impact Compliance with Air Quality Standards						
Significant Impacts¹ (µg/m³)						
Pollutant²	Period	08/09 Expansion Impact	Market Access Impact	Brookfield Background Concentration³	Combined Cumulative Impacts + Background	NAAQS
NO ₂	Annual	2.25	15.7	31	48.95	100
PM ₁₀ ⁴	24-Hour	13.00	20.4	42	75.40	150
	Annual	1.87	NA ⁵	19	20.87	50
PM _{2.5}	24-Hour	13.00	NA	33	46.00	65 ⁶
	Annual	1.87	NA	12	13.87	15

¹ µg/m³ means micrograms per cubic meter

² NO₂ means nitrogen dioxide. PM₁₀ and PM_{2.5} mean particulate matter with aerodynamic diameters of less than or equal to 10 and 2.5 microns, respectively.

³ Background concentrations represent three-year averages (i.e.: 2004 through 2006) of the three CT DEP air quality monitoring stations closest to the proposed Brookfield site.

⁴ All PM emissions from natural gas combustion are considered to be less than 1 micron in aerodynamic diameter. Therefore, the PM₁₀ and PM_{2.5} impact values are equal.

⁵ NA indicates that impacts are insignificant and are listed in Table CSC-12-2 below.

⁶ The DEP finalized a new interim policy adopting a more stringent 24-hour PM_{2.5} standard of 35 µg/m³ and new PM_{2.5} SILs in August of 2007. If the policy applies at all, it would only affect the Brookfield 08/09 Expansion Project, since the MarketAccess Project air permit was approved prior to the new policy. If the policy applies to the Brookfield 08/09 Expansion Project facilities, the original air quality impact modeling alone would not demonstrate compliance with the new standard. The DEP has not promulgated any PM_{2.5} regulations, and the US EPA has not promulgated any regulations or published any guidelines or requirements for demonstrating compliance with the new PM_{2.5} standard. Iroquois has been discussing compliance strategies with the DEP as part of its 08/09 Expansion Project air permit application and modeling review. Iroquois will submit additional documentation to demonstrate to DEP either that the proposed Brookfield project complies with the new PM_{2.5} policy or that potential PM_{2.5} emissions are less than the policy's 15 ton per year applicability threshold. Estimated project PM_{2.5} impacts and/or background concentrations may be reduced from what are shown in this table consistent with new DEP policy guidelines.

Table CSC-12-2, below, summarizes the insignificant impacts associated with both Brookfield projects. It compares those impacts with significant impact levels to demonstrate that these potential project impacts are insignificant and, therefore, comply with applicable NAAQS.

Table CSC-12-2 Brookfield Station Projects Air Pollutant Impact Compliance with Significant Impact Levels				
Insignificant Impacts ($\mu\text{g}/\text{m}^3$)				
Pollutant	Period	08/09 Expansion	Market Access	SIL
PM ₁₀	Annual	NA ⁷	0.84	1
PM _{2.5}	24-Hour	NA	NA	NA ⁸
	Annual	NA	NA	NA
CO	1-Hour	77.0	258.8	2,000
	8-Hour	77.0	213.3	500
SO ₂	3-Hour	0.88	2.00	25
	24-Hour	0.24	1.00	5
	Annual	0.035	0.0107	1

⁷ NA indicates that impacts are significant and are listed separately in Table CSC-12-1 above.

⁸ See footnote 6 of Table CSC-12-1.

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PE, Quonset Environmental Associates**

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Q-CSC-13

Discuss the effects of increased air emissions from the proposed Brookfield Compressor Station with the proposed 08/09 Expansion Project versus the previously approved MarketAccess Project.

RESPONSE:

As described and tabulated in the response above to CSC Interrogatory Item 12, all of the potential MarketAccess and 08/09 Expansion Project air pollutant impacts from the Brookfield Compressor Station have been shown either to be insignificant or less than National Ambient Air Quality Standards (NAAQS) applicable at the time of submitting air permit applications.

Table CSC-13, below, shows each project's potentially significant impacts as a percentage of the NAAQS. It also shows the combined Brookfield Station impacts as a percentage of the NAAQS at the time of submitting both project air permit applications.

The United States Environmental Protection Agency (EPA) sets the NAAQS, which the Connecticut Department of Environmental Protection (DEP) adopts and enforces. EPA has determined that the NAAQS are adequate to protect public health and the environment from the effects of air pollutant emissions. If project impacts are less than the NAAQS, then there are no adverse health or environmental air quality impacts. EPA also sets significant impact levels (SILs) at a small fraction of the NAAQS. If projects exceed the SILs, this merely requires additional analysis to demonstrate compliance with the NAAQS. For the pollutants of interest for the Brookfield Station, SILs represent only a few percent or less of the NAAQS. Only nitrogen dioxide and particulate matter emission levels exceed the SILs.

Therefore, although the table below indicates that there would be some incremental potential air quality impacts from the proposed Brookfield Compressor Station with the proposed 08/09 Expansion Project versus only the previously approved MarketAccess Project, those impacts would not exceed the NAAQS and therefore would not present adverse public health or environmental effects.

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Table CSC-13⁹ Potentially Significant Air Quality Effects Iroquois' 08/09 Expansion and MarketAccess Projects							
Pollutant	Period	08/09 Expansion Impact	08/09 Percent of NAAQS	Market Access Impact	Market Access Percent of NAAQS	Combined Brookfield Impacts	Combined Percent of NAAQS
NO ₂	Annual	2.25	2	15.7	16	17.95	18
PM ₁₀	24-Hour	13.00	9	20.4	14	33.40	23
	Annual	1.87	4	0.84	2	2.71	6
PM _{2.5}	24-Hour	13.00	20	20.4	31	33.4	51
	Annual	1.87	12	0.84	6	2.71	18

⁹ See footnotes to Table CSC-12-1 in response to Q-CSC-12.

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Project Manager - ENSR**

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Q-CSC-14

Describe site-specific measures to minimize fugitive dust from construction activities on the areas surrounding the proposed facilities.

Response:

Iroquois will take appropriate measures to minimize fugitive dust from construction activities. As a result of the operation of construction equipment and the movement of soil within the project area, dust may be generated throughout the construction and restoration process. The magnitude of dust generated will depend on weather and soil conditions at the time of construction.

Should dry conditions exist, the work areas, temporary access roads and ancillary facility sites would be dampened by watering (using a truck or other appropriate means) or covered with mulch or other non-asphaltic soil tackifier as recommended by the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control (Chapter 5 – Pages 5-2-12 and 5-2-13). Due to the proximity of wetlands to the proposed construction area, Iroquois does not intend to use calcium chloride to suppress dust.

In general, there is a significant vegetated buffer between the proposed construction area and the nearby residences and school. As indicated in the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control, “undisturbed vegetative buffers (minimum of 50-foot width) left between graded areas and area to be protected can be very effective.” The Environmental Inspector and/or Construction Manager (or their designees) will assess conditions in the project area and will specify the application of dust suppressants, as necessary.

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Q-CSC-15

Describe the anticipated construction schedule, including hours per day, days per week and total construction weeks for each of the proposed facilities.

RESPONSE:

Typically, proposed natural gas projects of this magnitude will utilize a construction schedule of 10 hour days (7:00 AM – 5/6:00 PM), 6 days per week (Monday – Saturday). However, if schedule dictates, alterations to this schedule may be made.

Milford Compressor Station – Construction is anticipated to begin in June 2008 and be completed by December 2008, with an in-service date of January 2009.

Newtown Looping – Construction is anticipated to begin in June 2008 and be completed by October 2008, with an in-service date of November 2008.

Brookfield Compressor Station (Phase II) – Construction is anticipated to begin in April 2009 and be completed by October 2009, with an in-service date of November 2009.

Q-CSC-16

Would Iroquois include the provision of a fire pump, water fire hose or hydrant equipment as part of the proposed project?

RESPONSE:

In the extremely unlikely event of a significant gas leak, the gas, being lighter than air, would dissipate very quickly. If leaking gas did ignite, typical practice is to close valves to isolate the leak and to let the fire burn itself out. Valves will be automatic systems, remote actuation or manually activated. Secondary fires are unlikely since there is a minimal amount of combustible material on site; however, such fire are best controlled with fire fighting equipment supplied by qualified emergency responders.

In Milford, pressurized water mains with hydrants are located along Oronoque Road at the proposed Milford compressor Stations to be utilized to control secondary fires.

In Brookfield, there are no pressurized water mains near the proposed facility, however, Iroquois has agreed to install a 75,000 gallon water tank, per the Brookfield Fire Departments recommendations, to be utilized to control secondary fires.

The compressor package enclosure is equipped with a fire suppression system that is self-actuated by fire detection sensors.

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Q-CSC-17

What is the proposed size and type of emergency generators at the proposed compressor stations? Would this be adequate to run the proposed facilities in the event of a long term power failure? Provide the maintenance protocol.

RESPONSE:

The emergency generator at each site will be a natural gas fired unit capable of handling all of the electrical needs for the facilities in the event of an electrical power interruption. Based on other Iroquois facilities of similar magnitude, each emergency generator will be approximately 350 kW. However, final design and model selection will be determined during detailed design. Maintenance will be performed in accordance with the manufacturer's specification.

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Q-CSC-18

Would the operation of the proposed project be in compliance with local and state noise ordinances for the proposed Milford and Brookfield Compressor Stations?

RESPONSE:

The sound emissions produced by the proposed gas compressor stations will comply with applicable FERC and State noise requirements.

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Q-CSC-19

What is the estimated sound level at the nearest receptor for each of the proposed facilities; include distance, duration, time of day, and number of days per year of silenced atmospheric gas release for normal operations?

RESPONSE:

Gas venting is required to make these facilities safe. It can be initiated automatically in the control system of the equipment, or manually on site. Iroquois does not vent gas on a regular, predetermined basis.

In 1998, Iroquois' acoustical consultant Lewis S. Goodfriend & Associates measured the sound level of a Unit Shutdown (silenced) and Emergency Shutdown Discharge (ESD) (unsilenced) at a distance of approximately 2,700 feet from the Athens Compressor Station. Using this measured data, the following table provides an estimation of the sound levels of this event at several distances:

Silenced Operational Blow Downs		
	Distance (ft.)	A-Weighted Sound Level (dB(A))
	2700	44
	1200	51
	600	57
	500	59
	400	61
	150	69

Silenced blow downs are designed to comply with the FERC established noise criteria (55 dB(A) L_{dn} at the nearest receptor). Silenced blow downs are typically 20 minutes in duration. As an example, at Iroquois' Dover Compressor Station from January 2005 to early May 2006, there were three scheduled blow downs for normal scheduled maintenance, during normal business hours, and five unscheduled blow downs. The frequency of these events will also be influenced by unplanned maintenance requirements.

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Q-CSC-20

What is the estimated sound level at the nearest receptor for each of the proposed facilities; include distance, duration, time of day, and number of days per year of unsilenced atmospheric gas release for plant startup or emergency blow down?

RESPONSE:

Gas venting is required to make these facilities safe. It can be initiated automatically in the control system of the equipment, or manually on site. Iroquois does not vent gas on a regular, predetermined basis.

In 1998, Iroquois' acoustical consultant Lewis S. Goodfriend & Associates measured the sound level of a Unit Shutdown (silenced) and Emergency Shutdown Discharge (ESD) (unsilenced) at a distance of approximately 2,700 feet from the Athens Compressor Station. Using this measured data, the following table provides an estimation of the sound levels of this event at several distances:

Unsilenced ESD Blow Downs		
	Distance (ft.)	A-Weighted Sound Level (dB(A))
	2700	89
	1200	96
	600	102
	500	104
	400	106
	150	114

ESDs are unsilenced and unplanned events that can occur at any time for a multitude of abnormal operating conditions. ESDs have a duration of approximately two to three minutes. For additional information, please see Iroquois' responses to Q-CSC-10 and Q-CSC--19.

**Iroquois Gas Transmission System L.P.
Petition No. 815
Responsible Witness:
Matthew T. Murello, P.E.,
President, Lewis S. Goodfriend & Associates**

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Q-CSC-21

Has the State of Connecticut provided an opinion on whether either or both silenced and unsilenced atmospheric gas releases are exempt from Connecticut Noise Control Regulations? Has an evaluation of prominent discrete tones based on ambient sound data and equipment sound spectra concluded that “normal operation of the proposed equipment is not expected to produce any sounds that would fall under this portion of the regulation” in reference to Connecticut Noise Control Regulations?

RESPONSE:

Under the Connecticut Department of Environmental Protection’s noise control regulations, noise resulting from pressure relief valves or emergency blowdowns would be either excluded from regulation as “[s]ound created by safety and protective devices” pursuant to Conn. Agencies Regs. § 22a-69-1.7(f) or exempted from regulation as “[n]oise created as a result of, or relating to, an emergency” pursuant to Conn. Agencies Regs. § 22a-69-1.8(f).

An evaluation of prominent discrete tones has not been conducted. Specific noise data has not been evaluated because the specific equipment has not yet been selected. As part of the design process, Iroquois and its noise consultant will review manufacturer data and based upon the equipment type, data provided and our experience, we will evaluate the potential for prominent discrete tones and recommend noise controls to minimize this. As noted in the response to Question Q-CSC-18, Iroquois will comply with applicable FERC and State requirements regarding noise from the compressor station.

**Iroquois Gas Transmission System L.P.
Petition No. 815
Responsible Witness:
Matthew T. Murello, P.E.,
President, Lewis S. Goodfriend & Associates**

**Connecticut Siting Council
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Q-CSC-22

How can the technical feasibility and cost of low noise equipment or added noise control materials be evaluated to meet 45 dBA at the nearest NSA without an estimate of the noise emissions of the proposed equipment?

RESPONSE:

As described the response to Q-CSC-21, the details of the facility design, as well as the specific equipment use, are both important factors in determining noise control measures and total sound levels. Precise details will not be known until the final design of the stations is completed, which will not occur until after all approvals are obtained. Based upon the final design of the stations and the specific equipment chosen, the details of noise controls necessary to meet the design goal will be determined, and a post-construction sound level survey will be completed to confirm that the stations comply with applicable requirements.

Q-CSC-23

How many lightning strikes have caused damage to Iroquois' gas pipeline infrastructure? What kind of damage?

RESPONSE:

Iroquois has experienced two lightning events that have had an impact on its gas pipeline infrastructure.

Iroquois experienced a lightning event at its Boonville Compressor Station in 2004 which caused the Station's Emergency Shutdown System (ESD) to activate. As the pressure in the gas piping was depressurized from the ESD through the emergency slow vent, the gas was ignited. The cause of the ignition of gas is believed to be from lightning or static electricity in the area. The vent, which was located in a safe location away from the compressor building and flammable materials, burned until the gas was depressurized to atmosphere. Once the gas was at atmospheric pressure the flame went out. Damage to the facility from the fire was limited to some charred paint on the vent stack. This fire did not make the station inoperable, cause any secondary fires or impact the surrounding environment.

In 1997 a section of pipe was removed from a cased road crossing on Route 34 in Newtown, CT. The pipe was removed to investigate some anomalies on the piping which were of interest to Iroquois. Upon removal of the piping and after investigation it was determined that a small section of piping experienced slight metal loss from a lightning strike in the area of the pipeline. This section of pipe was replaced.

Neither of these incidents is considered a reportable incident as defined by 49 CFR Part 191 requirements, and service was not negatively impacted.

In addition, Iroquois has experienced several lightning events on its pipeline system that have caused minor to:

- Electronic equipment;
- Impressed current rectifiers components; and
- Other equipment susceptible to damage from current surge.

**Iroquois Gas Transmission System L.P.
Petition No. 815
Responsible Witness: John Zimmer, Senior
Project Manager - ENSR**

**Connecticut Siting Council
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Q-CSC-24

Would Iroquois be willing to avoid construction of the Newtown Loop from November to April to avoid the potential impacts to populations of hibernating Eastern box turtles?

RESPONSE:

Iroquois would be willing to avoid major construction activities involving earth disturbance such as grading and trench excavation from November to April to avoid potential impacts to populations of hibernating Eastern box turtles. Activities such as final restoration and monitoring may occur within this time period but would not involve heavy equipment and should not impact hibernating turtles.

**Iroquois Gas Transmission System L.P.
Petition No. 815
Responsible Witness: John Zimmer, Senior
Project Manager - ENSR**

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Q-CSC-25

Would Iroquois sweep the proposed Newtown Loop area to determine the presence of Eastern box turtles prior to construction?

RESPONSE:

Iroquois has consulted with the CT DEP Division of Wildlife regarding the protection of Eastern box turtles and associated habitat that may be present within the Newtown Loop project area. Iroquois identified specific measures to avoid / minimize potential project-related impacts to Eastern box turtles in a letter to CT DEP dated August 17, 2007. On August 24, 2007, CT DEP provided a letter concurring with Iroquois' proposed methodologies, which includes daily surveys of the construction workspace for Eastern box turtles by an Environmental Inspector. Copies of both letters are attached herein.

ENSR

95 State Road, Sagamore Beach, Massachusetts 02562-2415
T 508.888.3900 F 508.888.6689 www.ensraecom.com

August 17, 2007

CT Department of Environmental Protection
Bureau of Natural Resources
Division of Wildlife
Attn: Ms. Julie Victoria
79 Elm Street – 6th Floor
Hartford, CT 06106

Re: Iroquois Gas Transmission System, L.P.
08/09 Expansion Project
Newtown, CT

Dear Ms. Victoria:

On behalf of Iroquois Gas Transmission System, L.P. (“Iroquois”), ENSR is pleased to submit information pertaining to protection of rare species associated with the above-referenced project. The intent of this letter is to detail the proposed impact avoidance, minimization and mitigation measures relative to Eastern box turtles (*Terrapene carolina*) present within the Project area as proposed by Iroquois during construction of the pipeline facilities. The following sections provide Iroquois’ proposed impact avoidance methodology:

The Eastern box turtle is a terrestrial turtle that occurs within a wide variety of habitats, including both dry and moist woodlands, brushy fields, thickets, marshes, bogs, and stream banks. Portions of the proposed project area will be located within or adjacent to potential Eastern box turtle habitat as determined by the Connecticut Natural Diversity Database. No surveys for or studies of Eastern box turtles has been completed within Project area, the majority of which coincides with the existing Iroquois natural gas pipeline easement. However, for the purposes of the Project, Iroquois shall assume that the majority of the areas crossed by the Project serve as potential Eastern box turtle habitat.

Potential impacts to Eastern box turtles will be limited in scope and duration based on the nature of construction activities. As previously discussed, the main threat to individual turtles would occur during the active construction phase. Iroquois anticipates that construction will start in the Summer of 2008 and extend for a period of approximately three to four months covering initial clearing through restoration. Ground and vegetation disturbance associated with the project is temporary in nature, and all areas will be restored to pre-construction grades and re-vegetated following completion of the pipeline installation. The proposed project will likely improve potential nesting and foraging habitat post-construction by exposing portions of the right-of-way containing sandy soils and maintaining early-successional vegetation.

To minimize or avoid potential impacts to Eastern box turtles, Iroquois proposes to incorporate the following mitigation methods into the project design:

Environmental Inspection – An environmental inspector shall be employed through the duration of the project beginning prior to any site activity and continuing through construction and final restoration. The inspector shall be responsible for positively identifying and relocating any turtles located within the Project workspace, shall serve as a contact point for contractor staff relative to questions or concerns relative to Eastern box turtles and shall serve as a liaison with the Town of Newtown natural resources staff and CT DEP regarding notification and data collection for turtles located during construction.

Contractor training – Contractors shall be trained by the environmental inspector on the identification of Eastern box turtles. All contractor staff shall be required to participate in this training, conducted as part of the overall environmental training, prior to entering the construction workspace. A protocol shall be established to direct contractors as to the appropriate course of action to be taken if individual turtles are encountered within the workspace.

Right-of-Way Signage – At periodic intervals (approximately 1/4-mile) along the construction corridor, signage shall be placed along the limits of the workspace indicating that work is occurring within designated rare species habitat. The signs will include representative photographs of Eastern box turtles as well as a summary of the protocol to follow should one be encountered within the workspace.

Daily surveys of workspace – Daily surveys will be conducted by the Environmental Inspector during active construction phases through identified and potential habitats. If turtles are found, they will be identified and marked and carefully removed from the construction site. The turtles will be placed into the same habitat in which they were found, but outside of the identified workspace. Data forms shall be completed and submitted for each individual turtle identified. Iroquois shall coordinate with CT DEP staff relative to morphometric and habitat data collection to ensure that it is consistent with previous studies and accepted methodologies.

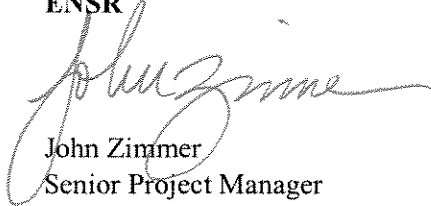
Habitat Restoration – Iroquois will revegetate the workspace upon completion of construction as soon as possible. The workspace will provide additional areas of potential nesting habitat and food sources.

Based on the proposed impact avoidance and minimization measures, Iroquois will protect the identified rare species habitat to the greatest extent practicable. Iroquois will work closely with CT DEP and the Town of Newtown natural resources staff to finalize and implement specific procedures for avoiding impacts to individual Eastern box turtles during construction. Habitat restoration measures will be incorporated into the project as specified by CT DEP, Town of Newtown natural resources staff and other environmental regulatory agencies, and monitoring efforts will be conducted for a minimum of two growing seasons post-construction to ensure that all applicable permit conditions are satisfied and there is no habitat degradation.

On behalf of Iroquois, ENSR requests that the CT DEP review this information and provide written comments relative to the proposed impact avoidance and mitigation measures. Should you have any questions regarding this information, please do not hesitate to contact me at (508) 888-3900 x 226. Thank you for your continued assistance and consideration.

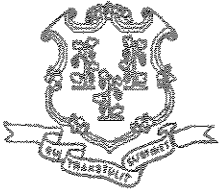
Sincerely,

ENSR

A handwritten signature in dark ink, appearing to read "John Zimmer", is written over the printed name and title.

John Zimmer
Senior Project Manager

cc: Ms. Kimberly Draghi – Iroquois
Mr. Robert Sibley – Town of Newtown



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION
FRANKLIN WILDLIFE MANAGEMENT AREA
391 ROUTE 32
NORTH FRANKLIN, CT 06254
TELEPHONE: (860) 642-7239



August 24, 2007

Mr. John Zimmer
ENSR
95 State Road
Sagamore Beach, MA 02562-2415

re: Three Iroquois Gas Transmission System Projects: Phase I, 3rd Project, 1.64 miles in Newtown, CT

Dear Mr. Zimmer:

Your proposed impact avoidance and mitigation measures concerning the state species of special concern; Eastern Box turtle (*Terrapene c. carolina*) were received on 8/23/07.

The Wildlife Division concurs with the methods described under Environmental Inspection, Contractor training, Right-of-way Signage, Daily surveys of workspace and Habitat Restoration.

If you have any additional questions, please feel free to contact me (860-642-7239). Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in dark ink, appearing to read "Julie Victoria", with a long, sweeping horizontal line extending to the right.

Julie Victoria
Wildlife Biologist
Franklin Swamp Wildlife Management Area
391 Route 32
N. Franklin, CT 06254

cc: NDDB – 15165