geometry, requiring recovery techniques unusual enough that the event was described at an international symposium. Based on this experience, readers were warned in future similar situations to expect propane in "separation of laminae or partings above the cavern roof."

5. FERC relied for its approval on its opinion that there is no faulting in the Camillus Shale cap rock above the proposed storage galleries. This assertion is contradicted by its own analysis regarding a prior surface leakage of brine that was associated with hydraulic fracturing, and worrisome evidence for additional potential leakage pathways has recently been summarized.

6. FERC relied for its approval on the assumption that both the upper and lower surfaces of the salt are relatively uniform and that the top and bottom of the salt are horizontal in parallel planes. Evidence has now come to light that this assumption may be incorrect.

7. While FERC did not rely for its approval on satisfactory performance of cavern Finite Element Analysis (FEA), it indicated its expectation that NYSDEC would rely on this type of analysis. Methods for performing FEA which takes into account the potential problems associated with interbedded shale layers have recently been published, which discuss the direct relationship between the thickness of interbedded shale layers and the potential for loss of integrity. Nothing in the public record suggests that the company took advantage of these or similar methods, despite the presence of thick shale interbeds.

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37 FERC Order Issuing Certificate dated May 15, 2014 in Docket No. CP13-83
41 FERC Order Issuing Certificate dated May 15, 2014 in Docket No. CP13-83
Gentlemen:

We believe that the Finger Lakes LPG Storage LLC located in the Town of Reading presents much less of a threat than the railroad trestle at the Glen. According to records obtained through the Schuyler County Historical Society, the trestle was built in 1876, which makes it 139 years old. In 1935 the trestle was damaged due to the flood and repaired. This was over 80 years ago. The trestle is 1.5 miles from Main Street Watkins Glen. There is a 530 foot elevation difference from the top of the rail to Main Street in Watkins Glen. It is 165 feet from the top of the rail on the trestle to the water in the Glen.

We know that the Norfolk Southern rail line is the party responsible for the safety of the rail system. However, a single inspection annually does not seem adequate considering the proposed increase in rail traffic of 11,000+ tank cars per year due to the propane industry storage and transfers proposed in Schuyler County. In this day and age of electronic monitoring, we see no reason not to monitor the trestle 24/7 and have it at the Norfolk Southern headquarters. We see the rail trestle as a prime target for a possible terrorist attack that could be devastating to our community.

The proximity of the Watkins Glen State Park Gorge to Watkins Glen International Race Track and the size of crowds associated with the big races, the absolute lack of regular and routine security at the trestle 365 days a year, except for the few weeks around race events and coupled with today's technology, creates a substantial security gap. These factors fit into the targeting selection process well in advance of major events. Additionally, the nature of the community and environment surrounding the trestle during the non-race event periods, provide ample opportunity for planting and "masking" an explosive device well before the influx of race car teams, media, fans and tourists for exploitation and maximum impact.

The scenario of just a single car derailment at the trestle would seem highly unlikely. However, a multycar derailment would seem all too possible. We feel it is a dereliction of duty by the NYS DEC, Schuyler County Emergency Management and the Schuyler County Legislature to allow even the possibility of this situation to occur. Each of these agencies is charged with the safety of the public in some fashion. There seems to be no attempt by any one of these agencies mentioned to mitigate the risk to public safety.
The Watkins Glen State Park Gorge is one of Schuyler Counties most visited tourist attractions. It is a natural wonder and one of a kind. If there were to be a derailment and explosion of the magnitude associated with the railcars and product being transported, it would be devastating to the community. It would also be a significant loss in sales tax revenues to have a major tourist attraction destroyed.

Sincerely,

Benjamin R. Dickens
Hector Town Supervisor on behalf of Town of Hector Town Board

cc: Schuyler County Legislature
105 Ninth Street, Unit 6, Watkins Glen, NY 14891

Schuyler County Emergency Management
105 Ninth Street, Unit 36, Watkins Glen, NY 14891

Honorable Andrew M. Cuomo
Governor of the State of New York
State Capital
Albany, NY 12224

Mitchell Dascher, President, US Salt LLC
PO Box 110
Watkins Glen, NY 14891
While outgoing DEC Commissioner Martens commented recently that industry and agriculture have co-existed for a long time in the Finger Lakes, I would like to draw your attention to the almost 250 local business owners who have expressed opposition to the industrial plans of Crestwood Midstream for the town of Reading in Schuyler County. Crestwood has already been cited for major brine spills in one of its projects in North Dakota (Wall Street Journal May 15, 2015). A brine spill on the shores of Seneca Lake would jeopardize the water quality for 100,000 people. Also, an industrial site of the size projected by Crestwood would change the ambiance of the southern end of the lake and damage a tourist industry that currently brings $2 million to New York. Is Crestwood's promise of 11 jobs worth the potential problems of this development? Please heed the voices of the 750,000 New Yorkers who oppose further development by this Texas firm.
Dear NYS Dept. of Environmental Conservation, Commissioner

To: The New York State Department of Environmental Conservation (DEC)

RESOLUTION OF THE EXECUTIVE COMMITTEE OF 1199SEIU UNITED HEALTHCARE WORKERS EAST IN OPPOSITION OF THE CONSTRUCTION AND OPERATION OF AN UNDERGROUND GAS STORAGE FACILITY

WHEREAS, the 1199SEIU Executive Committee was contacted by members of Health Systems VII, 1199SEIU Upstate New York seeking our support in the form of a resolution to the New York State Department of Environmental Conservation (DEC) to deny the application of Crestwood Mainstream Partners, LP for an operating permit that would allow the storage of liquid propane gas (LPG) and methane gas along the shores of Seneca Lake and in the salt caverns beneath the Lake; and

WHEREAS, the 1199SEIU Executive Committee recognizes the importance of Seneca Lake to the State of New York and the surrounding community as a drinking water source, for recreation, as a natural habitat, and in supporting the thriving tourism and wine making industry of the Finger Lakes Region; and

WHEREAS, this Committee understands that the storage of LPG along the shores of Seneca Lake and in unstable salt caverns with a history of collapse is a danger to thousands of our 1199SEIU members and their extended families who get their drinking water from this or other Finger Lakes; and

WHEREAS, this Committee opposes efforts to expand dependence on fossil fuels and exacerbating the crisis of climate change; especially when this involves transporting by-products of fracking, including liquid propane and methane gas from Pennsylvania, into New York where we have just won a ban on fracking; and thereby endangering the health and safety of our 1199SEIU members and New York State residents; and

WHEREAS, this Committee understands the importance of protecting areas such as Seneca Lake, which not only provide clean drinking water, but are also attractions for tourists and residents alike for the recreational activities and natural beauty that they provide; and

WHEREAS, the proposed operation at Seneca Lake would import LPG to the town of Reading, New York, just north of Watkins Glen, New York, via pipeline, truck and railcar; and

WHEREAS, as the LPG is pumped into the salt caverns a salty brine is displaced and stored above ground in large open ponds with the gas residues burned off in 60 foot high flares; and

WHEREAS, when the LPG is drawn out for shipping further North and East this process is reversed with the salty brine pumped back into the salt caverns; and

WHEREAS, this activity poses a risk that small fissures in the caverns could release the salty brine and/or LPG into Seneca Lake thus forever damaging the water; and
WHEREAS, this Committee is deeply concerned with the potential for dramatic and catastrophic environmental impacts from this proposed project at Seneca Lake which could set a dangerous precedent for other companies to propose similar projects for the rest of the Finger Lakes area and throughout New York State; and

WHEREAS, this Committee is opposed to the issuance of an operating permit for the storage of LPG on the shore of and beneath Seneca Lake; and

WHEREAS, legislative bodies across the surrounding area have also expressed their opposition and passed resolutions in opposition to the project proposed by Crestwood Mainstream, including:

• County of Seneca, • County of Ontario, • County of Yates, • County of Tompkins County of Cayuga, • City of Rochester, • City of Syracuse, • City of Geneva, • City of Ithaca, • Town of Brighton, • Town of Rush, • Town of Juni, • Town of Waterloo, • Town of Geneva, • Town of Varick, • Town of Lodi, • Town of Starkey, • Town of Seneca Falls, • Town of Fayette, • Town of Romulus, • Town of Ovid, • Town of Ulysses, • Town of Ithaca, • Town of Skaneateles, • Town of Caroline, • Village of Waterloo, and • Village of Watkins Glen

NOW, THEREFORE; BE IT RESOLVED, that this Resolution urges the New York State Department of Environmental Conservation (DEC) to consider the concerns raised by scientists, citizens, political leaders and legislative bodies of the Counties, Cities, Towns and Villages that surround Seneca Lake and requests that the application pending before the New York State DEC from Crestwood Mainstream Partners, LP, an organization out of the State of Texas, to allow storage of LPG along the shores of Seneca Lake and in salt caverns beneath Seneca Lake be denied.

Sincerely,

Angel Reyes

1960 E. Tremont Avenue
Bronx, NY 10462

2126030022
August 3, 2015

Benjamin Dickens, Supervisor
Town of Hector Town Board
5097 SR-227
Burdett, NY 14818

Dear Supervisor Dickens:

I am in receipt of your letter of July 22 relating to the Finger Lakes LPG project. While I respect your board’s right to take a stand on any issue, I am disappointed and disheartened that you did so without taking the time to gather accurate data. Specifically I am writing in response to your allegations of “dereliction of duty by the Schuyler County Emergency Management office”.

To be blunt, I find the aforementioned accusation reprehensible. To make this assertion without you, or any members of your board contacting this office to discuss the issues of your concern, and to further surmise and state that the emergency management office is allowing a possibility of an incident to occur, is extremely disappointing conduct of a public body.

Emergency management and planning does not avert or eliminate threats; rather it focuses on creating plans to decrease the impact of disasters. Emergency Management is the framework within which communities reduce vulnerability to hazards and cope with disasters. The process uses sound risk management principles such as hazard identification, risk analysis, and impact analysis, in assigning priorities and resources. As an emergency manager it is imperative that we develop and sustain sincere relationships with individuals and organizations to encourage trust and facilitate communication.

With regards to your concerns with the rail system through Schuyler County, I would like to correct misstatements in your letter. We have worked closely with Norfolk Southern and the Federal Rail Administration (the authority having oversight of the rail system) specifically dealing with risk reduction and mitigation measures. These measures include compliance to the federal rail safety inspection program; reduced speed limit on the rail line over the gorge; as well as weekly track inspections by Norfolk Southern. As to rail traffic, the actual projected annual tank car traffic has been determined to be approximately 1,800 not 11,000. 11,000 is the maximum rate of capacity, but you need to look at the actual days and times of operations to see the true throughput.

As for your prediction of a terrorist attack, there is a potential for any site to be a possibility; it is the probability that has more weight when conducting threat assessments. We work collaboratively on a daily basis with local, state and federal counter terrorism authorities, participating in terrorism threat briefings, counter terrorism training, conducting terrorism risk assessments, monitoring threats and providing situational awareness of potential targets throughout the county. We weigh the possibility
versus the probability for all potential threats. There are processes and procedures in place to respond accordingly.

I would also like to remind you that each year our office hosts a Public Officials Conference/Tier 3 training to provide local elected officials with an overview of the emergency management program in Schuyler County. This training provides an understanding of the fundamental principles and processes of emergency management as well as the local governments' responsibility. While invitations to attend this valuable training have repeatedly been sent to you and your board, there has been only one official from the Hector Town Board to attend a session in the last two years.

Again, I respect your board's right to take a stand on any issue. However, I would hope that when doing so in the future that you do so factually and objectively. My office continues to stand ready to offer any assistance or guidance should you so request.

Respectfully,

William Kennedy
Director, Office of Emergency Management

cc: Schuyler County Legislature
105 Ninth Street, Unit 6
Watkins Glen, NY 14891

The Honorable Andrew M. Cuomo
Governor of the State of New York
NYS State Capital
Albany, NY 12224

Mitchell Dascher, President
US Salt LLC
P.O. Box 110
Watkins Glen, NY 14891

Marc Gerstman Acting Commissioner
NYS DEC
625 Broadway
Albany, NY 12233

Regional Director Paul D'Amato
NYS DEC Region 8
6274 E. Avon-Lima Road
Avon, NY 14414-9519

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Twitter:
August 5, 2015

Permit Administrator Scott Sheeley
NYSDEC
6274 East Avon-Lima Road
Avon, NY 0

Dear Permit Administrator Sheeley,

Enclosed please find a certified copy of Resolution No. 129 entitled "A RESOLUTION OF THE COUNTY LEGISLATURE OF THE COUNTY OF ONONDAGA, NEW YORK TO THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION (NYSDEC) IN SUPPORT OF THE REQUEST MADE BY THE SENECA COUNTY LEGISLATURE, NEW YORK AND THE VARIOUS LEGISLATIVE BODIES OF OTHER AREAS IN THE VICINITY OF SENECA LAKE SEEKING THE DENIAL OF THE REQUEST BY CRESTWOOD MIDSTREAM PARTNERS, LP FOR APPROVAL OF A PLAN FOR MASS STORAGE OF LIQUID PROPANE GAS (LPG) ADJACENT TO OR UNDER SENECA LAKE".

The Onondaga County Legislature adopted this resolution on August 4, 2015.

Sincerely,

KATHERINE M. FRENCH
Deputy Clerk
A RESOLUTION OF THE COUNTY LEGISLATURE OF THE COUNTY OF ONONDAGA, NEW YORK TO THE NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION (NYSDEC) IN SUPPORT OF THE REQUEST MADE BY THE SENeca COUNTY LEGISLATURE, NEW YORK AND THE VARIOUS LEGISLATIVE BODIES OF OTHER AREAS IN THE VICINITY OF SENeca LAKE SEEKING THE DENIAL OF THE REQUEST BY CRESTWOOD MIDSTREAM PARTNERS, LP FOR APPROVAL OF A PLAN FOR MASS STORAGE OF LIQUID PROPANE GAS (LPG) ADJACENT TO OR UNDER SENeca LAKE

WHEREAS, the County Legislature of the County of Onondaga was contacted by members of the Seneca County Legislature seeking our support in the form of a resolution to the New York State Department of Environmental Conservation (DEC) to deny the application of Crestwood Midstream Partners, LP for an operating permit that would allow the storage of liquid propane gas (LPG) along the shores of Seneca Lake and in the salt caverns beneath the Lake; and

WHEREAS, this Onondaga County Legislature recognizes the importance of Seneca Lake to the State of New York and the surrounding community as a drinking water source, for recreation, as a natural habitat, and in supporting the thriving tourism of the Finger Lakes Region; and

WHEREAS, this County Legislature understands the dangerous precedent that would be set by allowing the storage of LPG along the shores of Seneca Lake and in the salt caverns beneath the Lake as the City of Syracuse gets its drinking water from another of the Finger Lakes, Skaneateles Lake; and

WHEREAS, the Onondaga County Legislature understands the importance of protecting areas such as Seneca Lake and Skaneateles Lake, which not only provide clean drinking water, but are also attractions for tourists and residents alike for the recreational activities and natural beauty that they provide; and

WHEREAS, the proposed operation at Seneca Lake would import LPG to the town of Reading, New York, just north of Watkins Glen, New York, via truck and rail, with the possibility of an eventual pipeline; and

WHEREAS, as it arrives, the LPG is drawn out for shipping further north and east and a salty brine is piped in to maintain the pressure level; and

WHEREAS, the Finger Lakes are shale rich, which means that the salt caverns are not solid salt deposits, but rather striated layers of salt and shale; and

WHEREAS, the activity proposed for the storage of LPG poses a risk that small fissures in the caverns could release the salty brine and/or LPG into Seneca Lake; and

WHEREAS, this Onondaga County Legislature is deeply concerned with the potential for dramatic and catastrophic environmental impacts from this proposed project at Seneca Lake, which could set a dangerous precedent for other companies to propose similar projects for the rest of the Finger Lakes area and throughout New York State; and
WHEREAS, this Onondaga County Legislature is opposed to the issuance of an operating permit for the storage of LPG on the shore of and beneath Seneca Lake; now, therefore be it

RESOLVED, that this Onondaga County Legislature urges the New York State Department of Environmental Conservation to consider the concerns raised by this County Legislature and, in particular, those concerns raised by the Seneca County Legislature and the other legislative bodies of the Counties, Cities, Towns and Villages that surround Seneca Lake, and hereby requests that the application pending before DEC from Crestwood Midstream Partners, LP, an organization out of the State of Texas, to allow storage of LPG along the shores of Seneca Lake and in salt caverns beneath Seneca Lake, be denied; and, be it further

RESOLVED, that the Onondaga County Clerk is hereby directed to transmit copies of this Resolution to Mayor Stephanie A. Miner, County Executive Joanie Mahoney, the Syracuse Common Council, Governor Andrew Cuomo, Attorney General Eric T. Schneiderman, U.S. Senators Schumer and Gillibrand, U.S. Representative John Katko; the members representing Onondaga County within the New York State Legislature, the Commissioner of the New York State Department of Environmental Conservation, the Permit Administrator of the New York State Department of Environmental Conservation, and the Federal Energy Regulatory Commission, Kimberly D. Bose, Secretary.
August 5, 2015

The Honorable Andrew Cuomo
Governor of New York
NYS State Capitol Building
Albany, NY 12224

Dear Governor Cuomo:

1199SEIU healthcare workers have always been committed to defending clean drinking water, advocating for the health of our communities, and stopping climate change. Now, we are calling on New York's public officials to do the right thing by prohibiting a Texas-based corporation, Crestwood Midstream, from storing liquid propane gas (LPG) next to Seneca Lake in Schuyler County. The full Executive Committee of 1199SEIU, United Healthcare Workers East unanimously passed a resolution that:

- Opposes the storage of liquid propane gas (LPG) along the shores of Seneca Lake and in unstable salt caverns with a history of collapse, because of the danger it presents to thousands of our 1199SEIU members, our families and our communities who depend on drinking water from this or other Finger Lakes in the region;

- Opposes any efforts to expand dependence on fossil fuels that would exacerbate the crisis of climate change and endanger the health and safety of our communities. Instead, we should be supporting technological innovation and green jobs in clean, healthy, renewable energy like solar and wind.

The resolution notes that the transport and storage of LPG along the shores of Seneca Lake, and the potential for accidents, threatens not only the natural beauty of the area, but also the drinking water for tens of thousands of people and that the risk to the environment is too great to allow the project to go forward.

We are joining twenty-eight local legislative bodies in the region that have already gone on record by passing resolutions in opposition to the Crestwood Midstream project. The DEC’s final decision is expected shortly.
RESOLUTION OF THE EXECUTIVE COMMITTEE OF
1199SEIU UNITED HEALTHCARE WORKERS EAST
IN OPPOSITION OF THE CONSTRUCTION AND OPERATION OF
AN UNDERGROUND GAS STORAGE FACILITY

WHEREAS, the 1199SEIU Executive Committee was contacted by members of Health Systems NW, 1199SEIU Upstate New York seeking our support in the form of a resolution to the New York State Department of Environmental Conservation (DEC) to deny the application of Crestwood Midstream Partners, LP for an operating permit that would allow the storage of liquid propane gas (LPG) and methane gas along the shores of Seneca Lake and in the salt caverns beneath the Lake; and

WHEREAS, the 1199SEIU Executive Committee recognizes the importance of Seneca Lake to the State of New York and the surrounding community as a drinking water source, for recreation, as a natural habitat, and in supporting the thriving tourism and wine making industry of the Finger Lakes Region; and

WHEREAS, this Committee understands that the storage of LPG along the shores of Seneca Lake and in unstable salt caverns with a history of collapse is a danger to thousands of our 1199SEIU members and their extended families who get their drinking water from this or other Finger Lakes; and

WHEREAS, this Committee opposes efforts to expand dependence on fossil fuels and exacerbating the crisis of climate change; especially when this involves transporting by-products of fracking, including liquid propane and methane gas from Pennsylvania, into New York where we have just won a ban on fracking; and thereby endangering the health and safety of our 1199SEIU members and New York State residents; and

WHEREAS, this Committee understands the importance of protecting areas such as Seneca Lake, which not only provide clean drinking water, but are also attractions for tourists and residents alike for the recreational activities and natural beauty that they provide; and

WHEREAS, the proposed operation at Seneca Lake would import LPG to the town of Reading, New York, just north of Watkins Glen, New York, via pipeline, truck and rail car; and

WHEREAS, as the LPG is pumped into the salt caverns a salty brine is displaced and stored above ground in large open ponds with the gas resides burned off in 60 foot high flares; and

WHEREAS, when the LPG is drawn out for shipping further North and East this process is reversed with the salty brine pumped back into the salt caverns; and

WHEREAS, this activity poses a risk that small fissures in the caverns could release the salty brine and/or LPG into Seneca Lake thus forever damaging the water; and

WHEREAS, this Committee is deeply concerned with the potential for dramatic and catastrophic environmental impacts from this proposed project at Seneca Lake which could set a dangerous precedent for other companies to propose similar projects for the rest of the Finger Lakes area and throughout New York State; and

WHEREAS, this Committee is opposed to the issuance of an operating permit for the storage of LPG on the shore of and beneath Seneca Lake; and

WHEREAS, legislative bodies across the surrounding area have also expressed their opposition and passed resolutions in opposition to the project proposed by Crestwood Midstream, including:

- County of Seneca,
- County of Ontario,
- County of Yates,
- County of Tompkins,
- County of Cayuga,
- City of Rochester,
- City of Syracuse,
- City of Geneva,
- City of Ithaca,