October 26, 2015

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

Dear Governor Cuomo:

Our organization, The New York State Division of the Izaak Walton League with members residing from the Western Finger Lakes area to the Utica-Rome area, has been following the developments on the gas storage proposal at the southern end of Seneca Lake. We know that the DEC and other regulators have been well informed of the concerns of numerous organizations, of business owners, and of many county, city, and town governments in the immediate area as well as similar entities along the Seneca River as far east as the City of Syracuse and Onondaga County.

Without going into details already known to DEC, we mention some of the main issues raised in response to the Crestwood proposal:

The receiving salt cavern is not structurally sound, having suffered a huge collapse in the 1960's.
There is a potential for an explosion which could pollute Seneca Lake, a water source for 100,000 people.
A significant industrial operation could dramatically harm the wine/tourism business in the Finger Lakes area.
Frequent trains carrying pressurized butane and propane over an old railroad bridge traversing a gorge in Watkins Glen State Park present a danger to sightseers in the gorge.
Lastly, any leaks from brine holding tanks into Seneca Lake would increase the salt content of the lake which is already the saltiest of the Finger Lakes.

We are adding our comments to those already received by your office with a respectful request that DEC consider its mission as presented on its web site: "To conserve, improve and protect New York's natural resources and environment and to prevent, abate and control water, land and air pollution, in order to enhance the health, safety and welfare of the people of the state and their overall economic and social well-being."
In our view, the many risks associated with this proposal are inconsistent with the responsibilities and goals detailed in the DEC's mission, and we urge that this application for gas storage at the foot of Seneca Lake be denied.

Our organization feels strongly on this issue since we find guidance from our national organization's Mission Statement — To conserve, maintain, protect and restore the soil, forest, water and other natural resources of the United States and other lands; to promote means and opportunities for the education of the public with respect to such resources and their enjoyment and wholesome utilization.

Very truly yours,

Les Monostory,
New York State Division President

Cc: Acting Commissioner Marc Gerstman
NYS Department of Environmental Conservation
625 Broadway
Albany, NY 12233-1010
New York State Department of Environmental Conservation
625 Broadway
14th Floor
Albany, NY 12233-1010

Re: Opposition to Liquefied Propane Storage in Salt Caverns on the Shore of Seneca Lake,
Reading, NY

Dear Marc Gerstman,

October 28, 2015

Please find a copy of an important letter sent to Governor Cuomo, enclosed.

In the letter, The Cortland-Onondaga Federation of Kettle Lake Associations (C-OFOKLA) asks the governor’s office to intervene, to deny the permit application of Crestwood Midstream of Huston, Texas, for their facility in Reading, New York.

We are concerned about environmental damage from many sources associated with this proposed storage and distribution plan, including inherent cavern instability, lack of safety, inadequate brine pond storage and transportation dangers, whether by truck, train, or pipeline. Specific concerns in each of these areas are detailed in the letter.

C-OFOKLA is a 501(c)3, non-profit organization. Our mission is to preserve the kettle lakes, surrounding waters and watershed regions in Cortland and Onondaga Counties. As lake and watershed stewards, when there is a risk of endangering the essential freshwater resources of the state, we feel compelled to speak up.

As the New York State agency charged with protecting our valuable resources, when such a large environmental risk is posed to threaten our valuable waterways, we hope that you too, will speak up in opposition to Crestwood Midstream Corporation’s plan and urge Governor Cuomo to do the same.

Sincerely,

Tarki L. Heath
President, Cortland-Onondaga Federation of Kettle Lake Assoc., Inc.
757-876-2198 – cell
Cofokla@gmail.com
The Honorable Andrew M. Cuomo  
Governor of New York State  
NYS State Capitol Building  
Albany, NY 12224

Dear Governor Cuomo,

Re: Opposition to Liquefied Propane Storage in Salt Caverns on the Shore of Seneca Lake,  
Reading, NY

The Cortland-Onondaga Federation of Kettle Lake Associations are asking you to intervene, to deny the  
permit application of Crestwood for their facility in Reading, NY. Our coalition, The Cortland-Onondaga  
Federation of Kettle Lake Associations, Inc. (C-OFOKLA), is a 501(c)3, non-profit organization. Our  
mission is to preserve the kettle lakes, surrounding waters and watershed regions in Cortland and  
Onondaga Counties. We create awareness of lake resources by educating communities about watersheds  
and their protection, and promoting stewardship of those waterways.

As lake and watershed stewards, when there is a risk of endangering the essential freshwater resources of  
the state, we feel compelled to speak up. Our watershed regions sit on the eastern edge of the Finger  
Lakes region. Seneca Lake, and all the Finger Lakes, was formed from the same glacial retreat that  
created our kettle lakes. We are very concerned about the storage of liquefied propane in abandoned,  
solution salt mines, (owned by Crestwood Midstream Corp of Houston, Texas) along the shore of Seneca  
Lake, a large and important water resource.

We are concerned about environmental damage from many sources associated with this proposal,  
including inherent cavern instability and lack of safety, inadequate brine pond storage, and transportation  
dangers, whether by truck, train, or pipeline. Specific concerns in each of these areas are detailed below.  
For these reasons, C-OFOKLA requests your intervention to deny the application to store gas in these salt  
mines.

Instability of the Caverns  
The Geophysicist, H. C Clark, PhD, Professor Emeritus at Rice University, wrote for Earthjustice  
(January, 14, 2014) that these caverns have an extended history of use and were never engineered for the  
“express purpose of storing and cycling compressed gas.” He also writes, “There also are geological  
features involved in these specific caverns that raise additional concerns about their viability as storage  
facilities and these features and concerns are not addressed in the public part of the [company’s]
pollution

compensation for an incident that occurred in Cavern 30 in the sixties when a fault block weighing more than 400,000 tons fell from the roof to the floor of the cavern then being used for propane storage. Finally, a major strike-slip tear fault, the Jacoby-DeWitt Fault, cuts the geologic section vertically in the north-south direction... It was along this major strike-slip tear fault path that brine flowed to the surface during a hydraulic-fracturing attempt at Well 29, a well near the fault and also near these caverns and situated similarly to Cavern 31 relative to the tear fault.”

In addition to these fault lines, the September 10, 2013 earthquake that hit the Watkins Glen area and the west side of Seneca Lake increases concerns over the instability of these caverns, and the need for more serious considerations of the geology of the region.

Historically Dangerous - Salt Cavern Storage

Between 1972 and 2012, 18 serious incidents occurred in salt cavern storage facilities. Nine of the incidents were accompanied by large fires and explosions, six involved loss of life or serious injury, eight cases caused evacuation of between 30 and 2000 residents, and catastrophic property loss occurred in 13 of the 18 cases.

The most serious salt cavern explosion in the United States, to date, happened in Hutchinson Kansas, on January 17, 2001, resulting in a gas explosion seven miles away from the salt cavern. A series of gas geysers (30 feet high) erupted about two miles from the caverns, and a gas explosion in a trailer park two miles from the caverns killed two people, and caused hundreds of homes to be evacuated.

These incidents are taken seriously by the Securities and Exchange Commission and insurance companies. Documents filed by Crestwood with the SEC indicate that the industry practice is so hazardous that in their words, “Our business involves many hazards and risks, some of which may not be fully covered by insurance.” In their Annual Report to the SEC, Crestwood Midstream Partners, LP goes on to list these risks as: *damage to pipelines and plants, related equipment and surrounding properties caused by natural disasters and acts of terrorism; subsidence of the geological structures where we store natural gas or NGLs (natural gas liquids), or storage cavern collapses; operator error; inadvertent damage from construction, farm and utility equipment; leaks, migrations or losses of natural gas, NGLs or crude oil; cyber intrusions and other hazards that could also result in personal injury, loss of life, pollution (including environmental pollution) or suspension of operations. The filing goes on to explain: For example, we do not have any property insurance on any of our underground pipeline systems that would cover damage to the pipelines. We are also not insured against all environmental accidents that might occur, some of which may result in toxic tort claims.*

This lack of, and inability to obtain, insurance indicates that these threats are not just possibilities, but are likely to occur. The permit, if granted must explicitly identify the planned repair, mitigation, and compensation for an environmental accident.
Brine Ponds
The storage of petroleum gasses in these caverns would be accomplished with use of brine. To remove the
gas, water would be pumped into the caverns, under very high pressure. When the gas is re-injected back
into the cavern for storage, the water must be removed. The brine that comes out is over ten times saltier
than sea water, a level that is toxic. Planned brine storage at this facility, includes two ponds, one of 7
acres with a volume of 1 million barrels and the other of 2 acres with a volume of 172,000 barrels.

These surface storage pits, built on steep slopes, are not guaranteed to hold if precipitation should exceed
the storage limits. We are already seeing 100 year floods and increased intensity of storms, occurring at a
more frequent rate in nearby areas. On June 15, 2015, heavy rains flooded roads and rail tracks in the
area, closing schools and causing damage to many homes. There is a real and significant threat of ponds
overflowing, with erosion of the pond wall (weir or dam). Release of this toxic wastewater would poison
terrestrial and aquatic life.

Seneca Lake already has a history of negative impacts from chloride into the lake from this industry as its
salinity has many times exceeded that of the other Finger Lakes. Should brine runoff enter the lake, it
would threaten the water supplies of over 100,000 people including the communities of Waterloo and
Geneva. The impact of chloride on drinking water is of general concern, but of greatest concern to the
elderly, youth, and those already facing health issues.

The use of water to move gas in and out of these caverns presents another issue: over time the water
dissolves the walls, ceilings and floors of these unlined structures, enlarging them at a rate of
approximately 3% each year. This enlargement, will likely cause further instability and increase risk of
gas and/or brine seepage.

Transportation
To service the facility, plans include a new truck depot, capable of loading and unloading four semi-trucks
per hour and a new, six-track siding capable of loading and unloading 24 rail cars in 12 hours.
Crestwood’s website confirms: “Readily connected to Teppco pipeline with rail and truck access capable
of loading and unloading 32 railcars per day and 45 truck transports per day.” This depot will be
designed to run 24 hours a day, seven days a week, year round. This will bring to the town trucks and
train cars filled with propane and butane on a constant cycle. The trucks will increase truck traffic on
routes 14 and 14A, already congested during tourist season, with narrow stretches of road running through
the center of town.

One of the tourist attractions is the Watkins Glen State Park, with over 500,000 visits annually. An 80
year old train trestle, rising 175 feet in the air, spans a popular gorge in the park. Along with aesthetic
and sound issues that would negatively impact this important tourism spot, there are also concerns that this
trestle would not be able to withstand the increase in traffic. According to an article in the Ithaca Journal,
no records detailing the condition of the bridge are currently available, and contrary to Crestwood’s lack
of concerns, Schuyler County legislators Michael Lausell and Van Harp, have written a brief expressing
"significant concerns" about LPG rail transport in Schuyler County. While general assurances regarding the safety of the rail system have been made, a small error could result in tragic consequences.

An accident from either a train derailment or truck accident would cause long term harm to Seneca Lake from spills of volatile organic compounds.

Pipelines

Although the original plans did not address pipelines, according to a recent statement made to the Ithaca Journal, Crestwood officials say that “100 percent of butane volumes would be transported to and from the facility by rail. For propane, 95 percent of the volumes would be delivered by pipeline and 5 percent by rail, and 100 percent of the stored volumes would leave the facility by pipeline. Methane is transported in pipelines.”

The pipelines proposed by Crestwood would be distributions lines. According to the Department of Energy, “The majority of natural gas pipeline-related incidents involve distribution pipelines.” The news is full of reports on pipeline accidents, and the list of these incidents increases as pipeline infrastructure ages. Pipelines are a growing concern across the country, and an additional risk at this site.

Compressor Stations

Compressor station discharges, or fugitive emissions, may occur because of leaks through valves, connectors and other parts. The US Environmental Protection Agency has documented that Volatile Organic Compounds and methane emissions can occur from LPG compressor stations at many different connection points. These tend to increase as the equipment ages.

Both accidental and scheduled "blow downs" (a necessary maintenance function of all compressor stations) can discharge gases 100 to 200 feet. The scheduled blow downs can last 3 hours.  

Dr. David Carpenter, of the Institute for Health and the Environment, at Albany University, cites a recent study of five states that found that 40% of the air samples from compressor stations exceeded federal regulations for benzene, formaldehyde, methane and hydrogen sulfide. According to an 2015 study in Pennsylvania, these, and other chemical emissions, have resulted in noted health impacts for those near the compressor stations, including nose-bleeds, sore throats, respiratory problems, fatigue, body weakness, sleeplessness, and some chemical exposures resulting in cancer.

In a letter from Schoharie County Supervisor, Richard Lape to your office (June 11, 2015), he and the Board of Directors called for an “immediate freeze on new air and water quality permits for natural gas infrastructure projects and a review of all research concerning health impacts from pipelines and compressor stations.” A call for a “comprehensive health impact statement” is also called for prior to new permitting.

Another issue, for those living in the vicinity of both pipelines and compressor stations, is the impact these have on property values. In the Town of Hancock, New York, the Millennium Pipeline runs a 15,000HP compressor station on Hungry Hill. Those in the vicinity state that their property values have
declined 25% to 50%. In their successful complaint to the County assessors, it was concluded that the property value decline was a direct result of the compressor station creating “heavy truck traffic, noxious odors, persistent low level vibrations and air contamination.” This conclusion confirms the complaints related to compressor stations and the negative impacts they have on those living nearby.

Although the EPA makes recommendations to the industry to “reduce emissions,” these recommendations are based on best practices and the accompanying necessary investments to equipment and monitoring, to reduce emissions that arise from compressors going offline for maintenance or from accidents. In other words, although mitigation is possible, emissions are expected. NYS must, at the very least, set specific limits on emissions and require more accountability from the gas industry.

In addition to the emissions, the NYS DEC has expressed concerns about the noise the compressor(s) will generate.

The Fire Stack
The plan calls for a flare stack to handle the burn-off of LPG during the brine transfer process. According to the US Environmental Protection Agency, the emissions from these flares can be difficult to characterize, but include soot, burned, altered and unburned hydrocarbons. It is agreed, however, that these are considered greenhouse gas emissions and a source of air pollution.

While a 60 foot flare stack is currently being considered, the NYS Department of Environmental Conservation has questioned whether this proposed stack could handle the capacity that would be needed. Concerns arise not only over the emissions, but also the possible need for larger or additional stacks.

Strong Community Opposition
Several counties and towns have voiced their opposition to the current plan. These municipalities either border the county or have other interests in preserving the quality of the water, air and countryside. The Finger Lakes region is an established and burgeoning tourist destination. Harm to Seneca Lake, could have a rippling, negative impact on the area as a whole, but especially on the lake tourism this area greatly depends on.

The flood of opposition to this plan, to date, includes local resistance by citizens, with over 400 protest arrests, resulting in the dismissal of many of these charges “in the interest of justice.” Nearly all of the 50 wineries around Seneca Lake have publicly opposed this project, and some of those winery owners were included in the above mentioned arrests. 31, local governments, including nine of the 15 towns around Seneca Lake, have adopted resolutions against this gas storage. That list is attached to this letter.

In Conclusion
The board of the Cortland - Onondaga Federation of Kettle Lake Associations, and our members, strongly recommend that Crestwood Midstream Corporation not receive a permit to store liquefied propane and butane in the salt mines of Reading, New York. As the Governor of the State of New York.
you have the ability to change the course of this project. We respectfully request that your office intervene on behalf of the citizens of this state, and halt the advancement of these applications.

Sincerely,

Tarki L. Heath

Tarki L. Heath, on behalf of
Cortland-Onondaga Federation of Kettle Lake Associations, Inc.
Tarki L. Heath, President
Robyn Fisher, Vice-President
Tom Cappa, Treasurer
Evelyn Pettit, Secretary

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Cc:
United States Senator, Charles Schumer, State of New York

United States Senator Kirsten Gillibrand, State of New York

Marc Gerstman, Acting Commissioner of the NYS Department of Environmental Conservation

United States Congressman Tom Reed, 23rd District of NY
Date of Correspondence 11/02/15

Perrin C Knapp
156 N Virginia Street
Waterloo NY, 13165

Organization: Retired
Email: knapppc@gmail.com
Email received from Website:

Dear sir: I am writing to express my concern about the Crestwood firm proposing propane storage in the salt caverns under Seneca Lake. The simplest way to look at this is monitoring for a possible leak and then cleanup afterwards if there is a leak. Monitoring would be very difficult. Cleanup would be impossible and could be very easily an environmental disaster that New York would never recover from. Please take a hard look at this proposal and do the right thing and deny it.
November 4, 2015

Basil Seggos, Acting Commissioner
New York State Department of Environmental Conservation
625 Broadway
Albany, New York 12207

Dear Acting Commissioner Seggos:

Congratulations on your recent appointment by the Governor to lead the Department of Environmental Conservation (DEC). I am sure there is no shortage of challenges in your new role, but hope the early transition has been smooth.

As you are aware, the proposed Liquefied Petroleum Gas (LPG) Storage Facility in the Town of Reading has generated concerns and questions from all stakeholders in the region. The proposal by Crestwood Midstream to construct a gas storage facility in salt caverns on the southern end of Seneca Lake requires the utmost diligence by DEC during its review process.

As Assembly Minority Leader and representative of Finger Lakes communities, I have heard from numerous residents, local officials, businesses and advocacy organizations regarding the Crestwood proposal. More than any area of New York State, the Finger Lakes Region relies on its unparalleled natural resources to support tourism, thriving industry, job-creation and a high quality of life. The health of the Finger Lakes is paramount to our continued prosperity.

The scope of the proposed LPG storage facility and its potential impact on our natural landscape necessitate careful consideration by DEC. This initiative carries far-reaching, long-term impacts across all sectors and communities within the region. Every aspect of Crestwood’s proposal and the potential effects must be thoroughly studied during your department’s consideration.

I hope you agree that as DEC’s review of the project continues, all details of the proposal must be carefully examined to ensure that the department’s decision protects our communities, our economy and allows the Finger Lakes Region to thrive.

Sincerely,

Brian M. Kolb
Assembly Minority Leader