January 5, 2015

Dear All:

Re: Finger Lakes LPG Storage, LLC, Notice of Deadline for Petitions for Party Status and Issues Conference
DEC Project Application Number 8-4432-00085

Regrettably, my previous summary outline had a typo and a mispelling. Point 13a was mistakenly listed at 100 million tons. It should have been 1.1 million tons. I misspelt and corrected the spelling of submission in the footer. I've enclosed a corrected version of the outline.

I am sorry that I made the mistakes but happy to correct it before the hearing.

Cheers,

John Halfman
Re: Finger Lakes LPG Storage, LLC, Notice of Deadline for Petitions for Party Status and Issues Conference

DEC Project Application Number 8-4432-00085

December 30, 2014

Below is an outline of my recent (12/10/2014) 27-page scientific report on the Chloride Hydrogeochemistry in Seneca Lake. I am submitting both this outline and my report to the people and organizations listed in the DEC website (http://www.dec.ny.gov/embr/99319.html) concerning the Finger Lakes LPG Storage, LLC, Notice of Deadline for Petitions for Party Status and Issues Conference (DEC Project Application Number 8-4432-00085). I am submitting these materials before the Issues Conference to be held this February, 12, 2015 because I believe that it will be useful in the conference deliberations as it has implications for the issuance of the DEC permit for this project. A pdf copy of the report is available on my web site:

http://people.hws.edu/halfman/Data/PublicInterestArticles/An%20Update%20on%20Major%20Ion%20Geochemistry%20in%20Seneca%20Lake,%20NY.pdf

Please note: I am not requesting Party or Amicus status (should I?). I have not retained legal counsel (should I?). I just want all parties involved to get the best science available about the chloride and related ‘water quality’ issues in Seneca Lake. I am an expert as I have been studying Seneca Lake for the past 2 decades as part of my ongoing monitoring effort and my scholarship as the inaugural Finger Lakes Institute Endowed Chair in Environmental Studies, and currently Professor of Geolimnology and Hydrogeochemistry in the Geoscience Department and Environmental Studies Program at Hobart and William Smith Colleges (HWS), Geneva, NY. I am willing to present/discuss any part of this report in an unbiased manner with any and all of the organizations involved in this process. I want to make sure DEC gets all the facts before they issue the permit.

You may also receive these same documents through the Coalition of Municipalities, spearheaded by R. Ken Camera, Geneva City Councilor, that have (or will be soon) applying for party status through NRDC.

My Major Talking Points (In parentheses, I reference pertinent tables and figures in my report):

1. The most recent, 10/25/2014, surface water chloride (Cl) and sodium (Na) concentrations in Seneca Lake were 122 and 75 mg/L, respectively (Table 3). This survey was part of an ongoing monitoring program of Seneca and neighboring Finger Lakes under my direction by the Finger Lakes Institute (Fig. 3).
   a. The Cl:Na molar ratio is 1:1 consistent with a Halite, NaCl source.
   b. The spatially uniform surface concentrations throughout the lake and slightly larger bottom water concentrations are interpreted to reflect the well-mixed epilimnion being slowly diluted by rain and stream flow dilution during the stratified summer season. The entire lake mixes each winter.
   c. Similar concentrations were detected in sample splits analyzed by my geolimnology/hydrogeochemistry research lab at HWS and a commercial ‘certified’ lab (Community Science Institute (CSI), Ithaca).
2. The current concentration for sodium is above the drinking water advisory of 20 mg/L set by the DEC & EPA for all infants and adults on low salt diets.
3. The Cl & Na concentrations in Seneca Lake are up to 10 times the concentrations detected in the neighboring Finger Lakes (Fig. 5). The hydrogeochemistry in Seneca Lake is unique.
4. In contrast, the concentrations of the other major ions (K, Ca, Mg, SO4) are similar across the Finger Lakes (Fig. 5).
5. Stream inputs of Cl and Na are sufficient to support the concentrations detected in the other Finger Lakes but not those detected in Seneca Lake (Fig. 4).
6. Road de-icing salts are a major contributor to the stream inputs of CI & Na. Monitored streams with a larger density of roads have larger CI concentrations. High concentrations in Plum Pt Creek most likely also reflect relict salt wastes from the abandoned Himrod salt mine along the western shore of Seneca Lake.

7. Therefore, Seneca Lake must have a unique, additional source of CI and Na.

8. Salt mines (US Salt and Cargill) located at the southern end of Seneca Lake are permitted to discharge CI and Na wastes directly into the lake. The combined stream and reported mine waste fluxes are still insufficient to provide enough salt to support the modern-day concentrations detected in Seneca Lake. Thus, Seneca Lake requires another major source of CI & Na of approximately 54 and 32 thousand metric tons each year, respectively (Table 5).

9. The additional source is hypothesized to originate from groundwater flow (Wing et al., 1995; Halfman et al., 2006). Seneca is the deepest basin among the Finger Lakes. Its bedrock floor intersects the halite deposits (Salina Formation) underneath the lake, the same deposits mined by salt mines (Fig. 2).

10. Historical CI data reported by major municipal water suppliers reveal two distinct trends in the Finger Lakes.
   a. Skaneateles, Hemlock and Canadice Lakes reveal increasing CI concentrations over time, primarily increasing in the 1960s and 1990s (Fig. 14). This pattern is observed throughout the northeast and is widely accepted to reflect increasing use of road de-icing salts in these watersheds over time.
   b. Seneca Lake and to a lesser extent Cayuga Lake CI trends are completely different. Significantly larger concentrations are detected in the early 1990s than the other lakes that increase to peak concentrations of 180+ mg/L in Seneca Lake in the mid-1960s and 1970s. The concentrations slowly decline from this peak to the present day (Fig. 15). The significant change indicates non steady-state, non-equilibrium conditions, i.e., the source and the quantity of CI in this source (or sources) of CI has changed over time.
   c. In Cayuga Lake, the historical pattern is attributed to modifying mine waste disposal methods during the mid-1960s at the Cargill rock salt mine along the southeastern shore of the lake (Effler et al., 1989). The subsequent decrease in mine wastes subsequently allowed the lake to become less saline since its 1960s peak to its modern day concentration.
   d. Finally, computer models indicate that it takes many generations, approximately 100 years, to achieve equilibrium concentrations in Seneca Lake after a “slug” of CI is added to the lake (Fig. 16). Thus, a significant one-time accident will take ~100 years (5 to 10 residence times) to naturally flush out of the system.

11. Another computer model, that varied the input of CI to Seneca Lake over time, was investigated to match the historical CI concentrations. The result indicated as much as 10 times the stream flux must be added to and subsequently removed from the lake over the past 100 years to mimic the historical CI concentration patterns (Fig. 8). The majority of this increase and subsequent decrease must be concurrent with the mid-century peak concentrations.

12. The early 20th century increase in CI concentrations parallels the onset of solution mining activities at the southern end of Seneca Lake? Groundwater pressure gradients and permeabilities in the Salina (rock salt) and neighboring rock formations (primarily fractured shales) are lacking to scientifically prove (or reject) this pertinent question. I recommend that Crestwood/US Salt perform month long (better yet yearlong) pressure tests on any cavern proposed for gas storage while a third party concurrently monitors the lake for CI & Na concentration trends to prove (or reject) the suitability of gas storage. It is a valid concern because the input of any additional salt will increase the salinity of the lake and potentially impact our ability to economically deliver Class AA drinking water to approximately 100,000 people.

13. Three historical events probably contributed to the 1965 – 1975 peak in CI concentrations.
   a. Brine waste and storage issues at the Himrod salt mine in the early 1970s resulted in the estimated release of 1.1 million tons of salt into Seneca Lake. This amount of CI, if added to the lake over a few years, is sufficient to increase the CI concentration in Seneca Lake to the observed historical peak concentrations. This release though post-dates the 1965 rise in CI in Seneca Lake. This rock salt mine was abandoned.
   b. TEPPCO has historically stored up to 4 million barrels of gas in abandoned salt caverns at the US Salt property. Gas was stored from 1964 to 1984. This piece of information is not in my report because I just learned about it a few days ago, and I am still double-checking some of the facts. Interestingly, the timing is correct to influence the peak concentrations in Seneca Lake, however critical information is lacking to scientifically prove (or reject) this coincidence.
   c. One of the caverns used for storage was subjected to a 400,000-ton rock fall from the cavern roof to its floor in 1967. It begs additional questions. Did the roof collapse cause leakage of salt from the cavern? Could a similar “accident” happen in the future?
   d. The draft environmental impact statement submitted by IEnergy (now Crestwood or now Seneca Lake LPG Storage?) many years ago proposed brine ponds to store brines displaced by the gas storage. Could pond failures cause another significant release of CI & Na to Seneca Lake?
c. Unfortunately, coincidence does not dictate causation. I openly speculated in the report that the groundwater source of Cl may have been modulated by earthquake activity. However, I am not aware of any other natural or human-induced event that could have created the observed Cl concentrations patterns observed in the lake.

The evidence outlined above is compelling. I would be very caution to use the salt mine caverns for gas storage due to its potential threat to Seneca Lake, a critical drinking water resource for approximately 100,000 people. I also strongly recommend that funding be made available to actively monitor the lake for any changes in salinity and other limnological parameters over time while any potential water quality threats exist within its watershed.

Finally, Seneca Lake like its neighboring Finger Lakes is experiencing nutrient loading issues from a variety of sources (phosphorus from agricultural runoff and human waste disposal). Some of the lakes have already had documented blooms of toxic blue green algae, again threatening its use as a potable water supply. If a saline brine leaked into Seneca Lake, and was dense enough to resist seasonal mixing, it would permanently cover the deepest portions of the lake floor. This layer would turn anoxic with time and promote the release of phosphorus from the underlying sediments. The extra source of phosphorus would intensify eutrophication processes. Details on the current state of the lake and its nutrient loading issues can be found in the recently completed Seneca Lake Watershed Plan for the NY Department of State. The chapter detailing the Characterization and Subwatershed Evaluation of the watershed is available in pdf format at: http://people.hws.edu/halfman/Data/SenecaCharacterizationSubwatershedEval.pdf

If anyone has any questions, please ask. I am available to present this information in future meetings.

Respectfully submitted,

John D. Halfman
Inaugural Finger Lakes Institute Chair in Environmental Studies
Professor of Geolimnology and Hydrogeochemistry
Department of Geoscience
Environmental Studies Program
Hobart & William Smith Colleges
Geneva, NY 14456
JANUARY 6, 2015

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

Dear Gov. Cuomo:

I am the owner of Austin Excavating & Paving, Inc. headquartered in Waverly, New York, and I am writing to express my support for the proposed Finger Lakes LPG storage project. As a local business owner, I know firsthand that construction projects like the Finger Lakes storage facility are crucial to positioning New York communities for success over the long run. The significant tax base provided by this infrastructure project will help to significantly reduce the tax burden that local residents would otherwise bear, and will provide funding for our schools and public services. The project will also help to reduce price spikes and ensure product supply for local consumers, and provides an environmentally-sound way to further use our natural resources (salt deposits) for the benefit of local communities.

I strongly urge you to provide the leadership necessary to show the public that New York is a good place to invest capital. Propane and natural gas have been stored in Upstate New York for decades, so we know this type of activity can be done safely and without negatively impacting other growing areas of our economy.

Sincerely,

Michael Austin
Austin Excavating & Paving, Inc.

cc: Commissioner Joe Martins, DEC
January 6, 2015

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

Dear Governor Cuomo:

I am the president of Bouille Electric, Inc. headquartered in Elmira, New York, and I am writing in support of proposed Finger Lakes LPG storage project.

Projects like the proposed LPG storage terminal are critical to helping our communities over the long run. This project adds significant tax base to help fund our schools and public services, which reduces the need for more tax hikes on businesses and residents. It will help protect families against price spikes, and help ensure that propane supplies are available for New York consumers during the winter. The project creates temporary and permanent jobs, both of which support our local economies as those workers spending money locally. Additional storage supplies provide greater opportunities for our communities to promote cleaner-burning fuels like propane.

Our communities work hard to attract and retain all types of businesses. Propane has been stored safely in the Finger Lakes for decades, so there's no reason to believe the proposed LPG project will hurt other growing areas of our local economies. I urge you to permit the Finger Lakes LPG storage project.

Sincerely,

Michael J Sineback  
President
January 6, 2015

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

Dear Governor Cuomo:

Since 1999, Community Care Network of Nichols has worked to enhance the life of residents of Nichols, New York and its neighbors through neighbors helping neighbors. Each day, our not-for-profit organization provides charitable services and acts of kindness to residents of our local communities. I am the Executive Director of Community Care Network of Nichols, and I am writing to express our support for Crestwood and its propane storage project.

Charitable organizations like ours were hard hit by the recession, and we continue to struggle to keep our doors open. We know the impact of higher energy costs and the benefits of keeping more dollars in our coffers, and sadly, we know all-too-well how higher energy costs devastate the people we help.

Since 2009, Crestwood has been a generous supporter of Community Care Network of Nichols, and other nonprofits in Tioga County, NY. Crestwood's support has been a crucial component in helping us keep our doors open. In addition, Crestwood doesn't require us to promote their support. As it was expressed to me at my first meeting with Crestwood employees in 2009, we are not concerned about recognition, we want to be a good neighbor and do our part for the community. In 2011, when Tioga County was devastated by flooding from Tropical Storm Lee, Crestwood once again stepped in to help the community unselfishly. At that time I was approached by a Crestwood employee and was given a financial authorization to purchase as much food as needed to help provide the 900+ meals we were providing to flood victims in the area. It is these acts of kindness and their ongoing financial support to agencies like Community Care Network of Nichols, which has made Crestwood truly a responsible and responsive neighbor for Tioga County.

Sincerely,

Dorothy Richter
Executive Director
January 6, 2015

Commissioner Joseph Martens
NYS Department of Environmental Conservation
625 Broadway
Albany, NY 12233

Dear Commissioner Martens,

New York Farm Bureau, the State’s largest general agricultural advocacy organization, is dedicated to solving economic and public policy issues challenging the agriculture industry. Our grassroots policy development process, which starts at the local level, ensures that our organization represents the views of our membership. As a result of policies approved by a majority at our 2014 state annual meeting, New York Farm Bureau is writing to support the proposed Finger Lakes LPG Storage Facility in Reading, New York.

Since 1911, New York Farm Bureau has been in the business of providing the resources that support and enrich the rural way of life. Our organization has helped farmers become more efficient, market their products better and promote a safe food supply and work environment. The proposed Finger Lakes LPG Storage Facility aligns perfectly with our members’ interests – it will help lower propane costs for our members, help avoid temporary shortages from arising during the winter months, and strengthen our communities by creating jobs and growing the tax base for a county that is in significant need of additional funds for schools, roads and community services. As a matter of policy, the New York Farm Bureau supports these clearly-defined benefits.

Last winter impacted the agriculture community particularly hard. Farmers who burn propane to dry crops, fuel generators, heat homes and buildings, and other uses, faced temporary shortages and significantly higher propane bills. According to the New York State Propane Gas Association, residential consumers paid more than $100 million to obtain propane supplies from farther away places because there simply wasn’t enough propane available locally.

Unlike other industries that can readily pass higher costs along to consumers, the agriculture industry suffers when faced with unexpected price spikes in commodities (including propane) used to fuel their operations. For example, farmers who depend on propane-fueled equipment to dry corn or beans normally cannot pass higher fuel along to the elevators or other customers who purchase their crops at index or firm prices. Consumers may be forced to pay higher retail costs if a higher-cost environment continues for a sustained period of time, but the farmer bears the brunt of these higher costs until consumers are willing to pay more. The Finger Lakes LPG Storage Facility is critical infrastructure that can help keep prices low and supply stable.
The agriculture industry also continues to advocate the development and use of cost-effective, commercial equipment fueled by clean-burning propane, rather than gasoline or diesel. The proposed storage facility promotes this objective by making available propane supplies available to the local market, as commercial-scale research and development activities advance more quickly in stable cost environments.

The agriculture industry has no desire to “bite the hand that feeds us,” and we are conscious of helping our industry overcome challenges in an environmentally-responsible manner. Underground propane storage in the Finger Lakes region has an established track record, with salt cavern storage facilities operating safely in Steuben and Cortland Counties since the 1950s. More generally, we know from the almost 30 natural gas and LPG underground storage facilities located across New York State that these facilities can benefit consumers without harming our environment.

New York Farm Bureau recognizes the substantial benefits of the Finger Lakes LPG Storage Facility to the agriculture industry, and asks you to permit this storage facility as soon as possible.

Sincerely,

Dean Norton
President, New York Farm Bureau

cc: Basil Seggos, Deputy Secretary for the Environment
Patrick Hooker, Deputy Secretary for Food and Agriculture
January 7, 2015

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

Dear Governor Cuomo:

I am writing to you as the President of Champion Fasteners, Inc, located in Elmira, New York. Champion Fasteners is a locally owned business that has served the industrial tools, hardware, and construction needs of Elmira, Corning, Horseheads, Bath, Binghamton, Waverly and Watkins Glen since 2002. I am also a member of the Chemung County Chamber of Commerce. I would like to express my wholehearted support of Crestwood’s proposed Finger Lakes LPG storage project.

I now know that salt caverns in the Finger Lakes have safely stored LPG for over half a century. In fact, according to the New York Department of Environmental Conservation’s website, there are 29 underground storage facilities in this state and I’ve never heard anyone complain about them until now. I can only assume that the proposed storage facility in the Finger Lakes would pose the same threat these other facilities have posed for the last 50 years.

Propane is a clean-burning fuel many upstate New Yorkers rely on to heat their homes and businesses. Last winter, the price of propane saw some wild swings. A lot of folks I know couldn’t keep up. This facility will help keep our money in our pockets – which will allow homeowners and local businesses to put more of it into the local economy.

Furthermore, the project will bring new jobs and economic opportunity to the region, and add significantly to local tax revenues – allowing local governments to meet the needs of our communities without having to raise taxes on the rest of us.

I strongly urge you to proceed with Crestwood’s Finger Lakes LPG storage project.

Sincerely,

Ronald Doane, President
Champion Fasteners, Inc

1250 College Avenue
Elmira, NY 14901
January 7, 2015

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

Dear Governor Cuomo:

I am the Chief Executive Officer of Lakeside Engineering, PC located in Rochester, New York.

I am writing to you as a strong advocate of the proposed Finger Lakes LPG storage project.

Projects like the proposed LPG storage terminal are critical to helping our communities over the long run. This project adds significant tax base to help fund our schools and public services, which reduces the need for more tax hikes on businesses and residents.

It will help protect families against price hikes, as well as help ensure that propane supplies are available for New York consumers during the winter. Additional storage supplies provide greater opportunities for our communities to promote cleaner-burning fuels like propane.

The project creates temporary and permanent jobs, both of which support our local economies as those workers spending money locally.

The project also helps many other firms in the state such as mine that are fortunate enough to do business with these fine people. It allows us to prosper from the many opportunities they make for firms such as mine and numerous others such as the auto dealers I am then able to buy a new car from.

Our communities work hard to attract and retain all types of businesses.

Propane has been stored safely in the Finger Lakes for decades, so there's no reason to believe the proposed LPG project will hurt other growing areas of our local economies. In fact just the opposite, it will help ensure their own futures as well.

Please consider carefully the application and you will certainly realize that the good far outweighs any bad, if there is any. I urge you to permit the Finger Lakes LPG storage project.

Sincerely,

Rod Prosser

Rod Prosser, PE, President, Lakeside Engineering, PC

11 Centre Park, Suite 305
Rochester, New York 14614

www.lsengpc.com

phone (585) 279-9300
email rodplepc@aol.com
January 8, 2014

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

Dear Governor Cuomo:

I am the president of MHD Solutions, Inc. headquartered in Lima, New York, and I am writing in support of proposed Finger Lakes LPG storage project. I have personally assisted in the generation of drawings to assist in the safe operation and maintenance of this facility. The companies involved with the operation in Watkins Glen are some of the most professional and knowledgeable that I have worked with in my 32 year career.

Projects like the proposed LPG storage terminal are critical to helping our communities over the long run. This project adds significant tax base to help fund our schools and public services, which reduces the need for more tax hikes on businesses and residents. It will help protect families against price spikes, and help ensure that propane supplies are available for New York consumers during the winter. The project creates temporary and permanent jobs, both of which support our local economies as those workers spending money locally. Additional storage supplies provide greater opportunities for our communities to promote cleaner-burning fuels like propane.

Our communities work hard to attract and retain all types of businesses. Propane has been stored safely in the Finger Lakes for decades, so there's no reason to believe the proposed LPG project will hurt other growing areas of our local economies. I urge you to permit the Finger Lakes LPG storage project.

Sincerely,

Jean Robertson  
MHD Solutions, Inc.
January 8, 2015

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

Dear Governor Cuomo:

Headquartered in Rye Brook, New York, we distribute propane to homes and businesses throughout most of eastern upstate and all of downstate New York. As a propane distributor that understands the value of lower energy costs to our customers, we are writing in support of Crestwood’s proposed Finger Lakes LPG Storage Facility.

The National Propane Gas Association and the New York State Propane Gas Association have long supported this storage project, so we’re confident others have explained why we need more local storage and stressed our industry’s established track record of storing and transporting propane safely. The truth is, we’re going to have problems during the winter as long as consumers remain heavily dependent on one pipe to supply everyone’s needs, and we’re talking about a pipe that cannot physically supply what it could two years ago. If you want to continue to promote clean-burning fuels like propane, then we should ensure those fuels are available. That means more local storage. Please note, this is a storage project, not a drilling or fracking venture.

We are asking you to strengthen New York’s energy infrastructure, reduce the energy costs paid by consumers, help the small businesses that deliver energy, allow the business community to create jobs and tax revenue, promote our nation’s energy independence, and support clean-burning fuels. We’re asking you to support the Finger Lakes LPG storage project.

Arthur Ravo
Purchasing Director
January 9, 2015

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

Dear Governor Cuomo:

I am the President and owner of National Vacuum Corp. headquartered in Niagara Falls, New York, and I am writing in support of proposed Finger Lakes LPG storage project.

Projects like the proposed LPG storage terminal are critical to helping our communities over the long run. This project adds significant tax base to help fund our schools and public services, which reduces the need for more tax hikes on businesses and residents. It will help protect families against price spikes, and help ensure that propane supplies are available for New York consumers during the winter. The project creates temporary and permanent jobs, both of which support our local economies as those workers spending money locally. Additional storage supplies provide greater opportunities for our communities to promote cleaner-burning fuels like propane.

Our communities work hard to attract and retain all types of businesses. Propane has been stored safely in the Finger Lakes for decades, so there’s no reason to believe the proposed LPG project will hurt other growing areas of our local economies. I urge you to permit the Finger Lakes LPG storage project.

Sincerely,

John Kozlowski
President
National Vacuum Corp.
January 9, 2015

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

Dear Governor Cuomo:

Headquartered in the Village of Ravena, New York, we distribute propane to homes and businesses throughout upstate New York and surrounding areas. As a propane distributor that understands the value of lower energy costs to our customers, we are writing in support of Crestwood’s proposed Finger Lakes LPG Storage Facility.

The National Propane Gas Association and the New York State Propane Gas Association have long supported this storage project, so we’re confident others have explained why we need more local storage and stressed our Industry’s established track record of storing and transporting propane safely. The truth is, we’re going to have problems during the winter so long as consumers remain heavily dependent on one pipe to supply everyone’s needs, and we’re talking about a pipe that cannot physically supply what it could two years ago. If you want to continue to promote clean-burning fuels like propane, then we should ensure those fuels are available. That means more local storage.

We are asking you to strengthen New York’s energy infrastructure, reduce the energy costs paid by consumers, help the small businesses that deliver energy, allow the business community to create jobs and tax revenue, promote our nation’s energy independence, and support clean-burning fuels. We’re asking you to support the Finger Lakes LPG storage project.

Sincerely,

Robert M. Nolan, President/Owner
RMN/sjn
January 9, 2015

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

Dear Governor Cuomo:

I am the owner of Power-Con, Inc. headquartered in Victor, New York, and I am writing in support of proposed Finger Lakes LPG storage project.

Projects like the proposed LPG storage terminal are critical to helping our communities over the long run. This project adds significant tax base to help fund our schools and public services, which reduces the need for more tax hikes on businesses and residents. It will help protect families against price spikes, and help ensure that propane supplies are available for New York consumers during the winter. The project creates temporary and permanent jobs, both of which support our local economies as those workers spending money locally. Additional storage supplies provide greater opportunities for our communities to promote cleaner-burning fuels like propane.

Our communities work hard to attract and retain all types of businesses. Propane has been stored safely in the Finger Lakes for decades, so there's no reason to believe the proposed LPG project will hurt other growing areas of our local economies. I urge you to permit the Finger Lakes LPG storage project.

Sincerely,

[Signature]
Richard C. Budgeon
Power-Con, Inc.
January 9, 2015

Dear Governor Cuomo,

I first want to extend my condolences for your recent loss. As one of many of your father's long time admirers, I would like to say that the loss was felt all around the state and beyond. He was an ethical man who stood by his principles – something rarely found in the political arena today.

Also, as a resident of New York I thank you for your courageous decision to prohibit fracking in New York. You said many times that you would let science dictate and I had almost lost faith that in our political structure today, that could happen. I thank you particularly for putting the health and safety of all New Yorkers before political concerns.

Another concern on the minds of many of us who live in the Finger Lakes is the plan to store fracked gas and LPG on the shores of our beautiful 4.2 Trillion gallon body of fresh water, Seneca Lake. My home and Bed and Breakfast business is approximately 5 miles from the site and I am extremely concerned. It is not only for myself that I am concerned. It is the bigger picture.

These projects pose a threat to the agriculture, wine making, tourism, and recreation industries that are the driving economic engine in the region. We have worked hard and it is paying off. Finger Lakes tourism accounts for approximately $3 billion of the state's economy annually and accounts for 58,000 jobs. Wineries employ over 1,000 people in the Finger Lakes and Seneca Lake - the largest of the Finger Lakes - is home to nearly half of all of the region's wineries. You have supported a community-based regional economic development strategy. Your vision and strategy is clearly working for the Finger Lakes and businesses around Seneca Lake. I encourage you to not let it die. People do not yearn to visit an industrial area. Please continue to support our existing sustainable and growing economy, rather than permitting an out-of-state corporation to industrialize the region for the promise of 8-10 gas-industry jobs.

Gas storage in the salt caverns along Seneca Lake, a drinking water resource for 100,000 people, poses many other threats to our health and safety. The air pollution due to the compressors and train traffic along with the potential for train accidents both pose serious risks. The salt caverns also lie along a strike slip fault and were previously deemed unsafe for gas storage due to cavern collapse. Another grave concern is the risk of catastrophic fire.

Please deny the applications for this development.

Sincerely,

[Signature]

Barbara A. Schiesser, Co-owner
Sunrise Landing Bed and Breakfast
Dear DEC Commissioner Martens,

We call for New York’s Department of Environmental Conservation to reject Inergy Midstream’s (now Crestwood) proposal to store Liquefied Petroleum Gas and expand natural gas storage at facilities on the shore of Seneca Lake in Reading, NY. The proposals threaten the health and well-being of residents throughout the region. Specifically:

- There has been almost no documentation of the project’s safety. Namely Inergy Midstream (now Crestwood) has failed to show that the toxic contents of the cavern will not migrate into groundwater or into Seneca Lake — a drinking water source for more than 100,000 people.
- The facility will release toxic air pollution, as will emissions from diesel trucks, putting the health of nearby residents at risk.
- Similar facilities have seen catastrophic accidents including storage cavern collapses and explosions such as in Hutchinson, KS and Mont Belvieu, TX.
- Accidents, explosions, spills, and other issues would pose devastating impacts to the region as a whole.
- The facility and associated heavy industrial activity will undermine our region’s tourism-based economy and property values.
- Inergy Midstream (now Crestwood) has a history of water quality violations at the site and has already had two brine spills.
- Inergy Midstream (now Crestwood) has performed grossly inadequate scientific reviews, and has refused to make public a critical study of the project’s safety.

These proposed projects threaten to jeopardize one of the largest sources of freshwater in the United States, threaten the health of countless residents, and threaten to devastate the vitality of the entire region. We stand with our NYS Senator Michael Nozzollo who has stated these risks in his letter to you. Commissioner Martens, do not put our homes, families, local economy, and one of our most treasured natural environments at risk. As a lifelong steward of New York and open spaces, do not jeopardize the destruction of Seneca Lake on your watch. Please protect us from this negligent corporation. Generations of New Yorkers will thank you for it.

Commissioner Phone # 518-402-8545
Fax 518-402-8541
1223310

12 2 33 - 10 

Ronald, New York
6 2 5 Broad Way
NY State Dept of Environmental Conservation

NY Commissioner Mamula

19 Jan 2015
Rochester NY 14614

Robert Mamula
January 15, 2015

Mr. Andrew M. Cuomo
Governor, State of New York
State Capitol
Albany, NY 12224

Dear Governor Cuomo:

I am writing to express our support for Crestwood's Finger Lakes LPG project. Tioga State Bank has served the Southern Tier of New York for the last 150 years and is headquartered in Spencer, NY. We support the LPG project because we feel it will provide economic stimulus to our region. In addition, it would help to provide a stable supply of propane and should help reduce price fluctuation based on shortages.

Many of our customers, employees, friends and neighbors heat their homes and fuel their businesses with propane. Lower energy costs and reliable supplies are good for the communities we serve as well as other communities throughout New York and the Northeast. Propane experts, including the national and state propane gas associations, tout this project because making more propane available locally will protect consumers against avoidable price spikes and temporary shortages during the winter.

As county economic development executives will tell you, our communities strive to broaden and diversify their tax bases to best position themselves against downturns that impact local industries. Infrastructure projects like the proposed storage facility are vital to accomplishing this goal, providing tax revenue to fund schools and public services and reducing the tax burden of residents and businesses. As a resident of Tioga County, I have witnessed the Stagecoach Natural Gas storage facility in Owego having this exact impact. Moreover, job creation is more important than ever as our Upstate communities continue to struggle.

Crestwood's project provides real consumer and economic benefits. It does so by providing storage services that are consistent with natural gas and LPG storage activities performed safely in the Southern Tier for decades. The project has been endorsed by unions, agriculture, manufacturing, energy and service industries including the New York Farm Bureau. This project should be embraced by the State.

Your support of Crestwood's LPG storage project is greatly appreciated.

Sincerely,

Robert M. Fisher
President & CEO
Tioga State Bank
1 N. Main St.; PO Box 386
Spencer, NY 14885
rfisher@tiogabank.com
Dear Governor Cuomo,

We are writing to inform you that our Town of Rush passed a resolution on January 14, 2015, stating its opposition to the natural gas storage and distribution project which is proposed for the west side of Seneca Lake, and which is being considered by the Department of Environmental Conservation.

We are proud to say that the Rush Town Board passed this resolution in time to be included with the filings submitted by the non-profit group Gas Free Seneca on January 16, 2015, in connection with an Issues Conference before the Department of Environmental Conservations scheduled for February 12, 2015 in Horseheads, New York.

The Town of Rush had previously passed a ban on hydrofracking in August of 2013. This resolution in opposition to the Seneca gas project is in keeping with that ban; and it is in keeping with the town’s intention to protect its citizens, and its hope to protect the entire region and New York State from the dangers and risks of hydrofracking and its ancillary activities.

Please remember, in all of your deliberations and decisions, that the Town of Rush opposes hydrofracking and all of its connected activities (including waste disposal and, in the case of the Seneca project, gas storage and distribution), as do many other communities across New York State.

We are enclosing a copy of the Resolution (Resolution #6-2015) that the Town of Rush passed.

Respectfully yours,

Rush Citizens Working Committee on Hydrofracking:
Carol Barnett and Jordan Kleiman, Co-Chairs
Ted Barnett
Kathryn Cappella Hankins
Beth Hoak
Robert Powers
Marianne Rizzo
RESOLUTION #6-2015
Councilperson Woolaver moved to support the opposition of the Seneca Gas Project as follows:

SENeca GAS PROJECT
WHEREAS, a proposal is before the Department of Environmental Conservation (DEC) to build a liquified petroleum gas (LPG) storage and distribution hub for the entire northeastern United States in a series of depleted salt caverns just north of Watkins Glen on the western shore of Seneca Lake;

WHEREAS, the proposed facility would store millions of barrels of pressurized LPG in unlined, irregular salt caverns within a fault-ridden brine field with a documented history of geological instability (including a 400,000-ton roof collapse in the cavern proposed for methane storage and a major rock fault intersecting the well proposed for LPG storage);

WHEREAS, storage of LPG (and methane) in salt-caverns is historically the riskiest means of gas storage (though the cheapest option for the industry) and has led to explosions, large-scale evacuations, and several catastrophic collapses and giant sink holes (the latter exemplified by the ongoing catastrophe in Louisiana’s Bayou Corne);

WHEREAS, the proposed facility would generate expansive transportation infrastructure and activity in connection with the storage, including daily rail transport of highly explosive materials over an 80-year-old spindly trestle spanning Watkins Glen gorge (one of New York State’s top ten tourist destinations), as well as possible extensive heavy-truck traffic in the future;

WHEREAS, the proposed facility includes a 60-foot tall flaring stack, several 700-horsepower diesel-powered compressors, and two brine ponds with a combined capacity of roughly 60 million gallons of super-saturated brine (many times saltier than sea water)—and all of this in an area renowned for its natural beauty, tourism, agriculture, and wine-making;

WHEREAS, Seneca Lake supplies drinking water to over 100,000 people and is one of the most important natural resources in the region;

WHEREAS, this project poses unacceptable risks of pollution to Seneca Lake and the surrounding land and air, and of uncontrollable fires and explosions in the event of an accident; and will industrialize the region and thereby damage the long-standing
and growing agriculture, wine, and tourist industries that form the economic backbone of the region;

WHEREAS, both Rush and the Seneca Lake watershed are part of the same interdependent ecological system known as the Great Lakes Basin, and that system is linked in such a way that what happens in one part can have an adverse impact on other parts;

WHEREAS, one of the greatest assets of living in this region is access to the natural beauty of the Finger Lakes; and WHEREAS, many of us in Rush take advantage of the recreational opportunities at or around Seneca Lake, and enjoy the products of the region's wineries and agriculture;

WHEREAS, the regional economy is related to Rush's economic well-being, and a boom-and-bust industry (particularly one that is so thoroughly dominated by out-of-state corporations) that displaces more sustainable economic enterprises is bad for the region and our town;

And WHEREAS, promoting the build-out of fossil-fuel infrastructure in New York State only delays the necessary work (and profound economic, environmental, and health benefits) of building a sustainable energy system;

THEREFORE, it is resolved that the Rush Town Board is in opposition to this project, and urges the Department of Environmental Conservation and other agencies having jurisdiction over it to deny approval and to protect the people and environment of New York State from the risks and adverse effects it would bring. Councilperson Frank seconded the motion.

Roll:

Councilperson Woolaver aye
Councilperson Steiner aye
Councilperson Frank aye
Councilperson McCarthy aye
Supervisor Anderson aye carried.

STATE OF NEW YORK )
MONROE COUNTY ss: TOWN OF RUSH )

TOWN CLERK CERTIFICATE
This is to certify that I, Pamela J. Bucci, Town Clerk of the Town of Rush in the said County of Monroe, have compared the above copy of Resolution #6-2015 from Rush Town Board Meeting Minutes of January 14, 2015 with the original now on file in this office, and that the same is a correct and true transcript of such original and the whole thereof.

In Witness Whereof, I have hereunto set my hand and affixed the seal of the said Town this 15th day of January, 2015.

Pamela J. Bucci
Town Clerk of the Town of Rush
Monroe County, New York