



State of Vermont

Agency of Natural Resources – Office of General Counsel
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Agency of Natural Resources

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March 22, 2018

Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

Re: Vermont Gas Systems, Inc., Addison Natural Gas Project
Docket No. 17-3550-INV

Dear Ms. Whitney:

The Agency respectfully submits the following in response to the Intervenor's Motion to Broaden Scope of Investigation ("Motion"). A corrected version of the Motion was filed on March 1, 2018, followed by the filing of 900-plus pages of attachments to the Motion on March 8.

The Agency is still in the process of reviewing the substantial amount of material filed with the Motion. At this time, the Agency has identified one item which it believes has the potential for significant impact to natural resources, and thus warrants further investigation. The referenced item concerns the issue of whether permanent bentonite trench breakers were not installed in areas where they should have been installed.

Included in the attachments to the Motion is a corrective action request issued by Vermont Gas ("VGS") on November 18, 2015. The corrective action request concerns an investigation by VGS to determine why trench breakers were not installed at design locations during construction of the pipeline in 2014. Attached to the corrective action request is an "as-built" table documenting where trench breakers were, and were not, installed. Project drawing ANGP-T-G-015 contains a plan view for a "TRENCH BREAKER WITH BENTONITE" (Detail 3 on the plan sheet). Note 2. for the bentonite trench breaker detail states: "PERMANENT TRENCH BREAKER WITH BENTONITE SEAL TO BE INSTALLED AT EDGE OF WETLANDS AND STREAMS."

At this time, based upon the attachments filed with the Motion, it appears that permanent bentonite trench breakers were likely not installed as contemplated by the Project plans at all wetland or stream locations during construction in 2014. The Agency believes further investigation of this issue is warranted and is appropriate for

inclusion in the pending proceeding. The lack of a permanent bentonite trench breaker in a location that necessitates a trench breaker has the potential to result in a significant impact to a wetland or stream resource. Further investigation is necessary to determine whether such trench breakers are lacking in areas where they are necessary and, if so, whether natural resources have been significantly and adversely impacted as a result.

Please contact me if you should have any questions.

Respectfully submitted,
State of Vermont Agency of Natural Resources

A handwritten signature in blue ink, consisting of a large, stylized 'D' followed by a horizontal line extending to the right.

By: Donald J. Einhorn, Esq.

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