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Via Electronic Delivery or Overnight Mail

September 14, 2015

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, New York 12223-1350

Re: CASE 13-T-0538 - Application of Williams Field Services Company, LLC and DMP New York, Inc. For a Certificate of Environmental Compatibility and Public Need to Construct an Approximately 9.5-Mile Natural Gas Gathering Pipeline in the Town of Windsor, Broome County, State of New York.

CASE 10-T-0350 – Joint Petition of DMP New York, Inc. and Laser Northeast Gathering Company, LLC to Amend the Certificate in 10-T-0350 (July 25, 2012) to add two compressor units.

Dear Secretary Burgess:

Williams Field Services Company, LLC and DMP New York, Inc. (collectively, “Williams”), has received the New York State Department of Environmental Conservation (“NYSDEC”) comments on the proposed New York (“NY”) Mainline Loop Pipeline Project (“Project”) and certificate conditions, dated September 4, 2015, regarding Case 13-T-0538. The NYSDEC letter also requested the certificate to clarify the relationship between Case 13-T-0538 and Case 10-T-0350. For ease of review, we have provided the NYSDEC’s comments in italicized font followed by Williams’ response.

Comment 1: With regard to temporary culverts, flows should be calculated based on flows associated with recent flooding events.

Response 1: Williams will ensure that temporary culverts are sized appropriately based on site conditions, expected flows and recent flooding events.

Comment 2: A condition should be added that the Trowbridge Creek shall be crossed using HDD.

Comment 2: Williams accepts this certificate condition addition.

Comment 3: A condition should be added regarding use of herbicides along the ROW indicating that they are subject to 6 NYCRR Part 325, including all New York pesticide label restrictions.

Comment 3: Williams does not use herbicides as part of its standard operating procedures for ROW maintenance and, therefore, does not plan on using herbicides along the ROW at this time. As such, Williams accepts this certificate condition addition and will adhere to 6 NYCRR Part 325, including all NY pesticide label restrictions should herbicides be used.

Comment 4: Proposed Condition 11: Include DEC staff from Region 7 in the consultation meeting on blasting activity proposed.

Comment 4: Although blasting is not anticipated, Williams accepts this certificate condition language modification.

Comment 5: Proposed conditions 13 and 30: The crossing methods for streams and wetland should be specified in the Plan and Profile drawings.

Comment 5: Tables 1 and 2 of the Application identifies the proposed crossing method for streams and wetlands, respectively. Williams will append these tables to the Erosion and Sediment Control Drawings.

Comment 6: Proposed Condition 19: The Natural Heritage Database is constantly updated. Accordingly, a new search of the Natural Heritage Database should be performed if the results from the proceeding search are over one year old.

Comment 6: Williams will update its search of the Natural Heritage Database.

Comment 7: Proposed Condition 36: For clarification, DEC proposes the following: "Applicant shall maintain a minimum burial depth of not less than 10 feet

between the natural stream bed bottom and the top of the bore hole when crossing under Trowbridge Creek.”

Comment 7: Williams accepts this certificate condition language modification.

Comment 8: Proposed Condition 39: Delete and replace with “Erosion control measures shall be in place and maintained in accordance with the SWPPP and the SPDES GP.”

Comment 8: Williams accepts this certificate condition language change.

Comment 9: In the certificate, the Commission should clarify whether the certification of the gas transmission line is being segmented from its review of the amendment to the certificate for the Dunbar compressor facility to add two turbine compressor units, or whether the gas transmission line has independent utility and can be operated independent of the Dunbar additional turbines.

Comment 9: Although this comment is directed to the Staff and/or the Commission, it is Williams understanding that the two applications are being reviewed together.

All correspondence or questions concerning the Application (Case 13-T-0538) and Case 10-T-0350 should be addressed to the undersigned. Thank you.

Respectfully submitted,

READ AND LANIADO, LLP

Attorneys for Williams Field Services Company, LLC
and DMP New York, Inc.

By: _____/s/_____

Sam M. Laniado

cc: Attached Service Lists

Mr. John Strub, New York State Department of Public Service

Mr. Corey Strub, New York State Department of Public Service

Mr. Steven Blow, Esq., Office of General Counsel

Mr. Scott Cook, New York State Department of Environmental Conservation

Mr. Lawrence Weintraub, Esq., New York State Department of Environmental Conservation