



NEW JERSEY HIGHLANDS COALITION

508 Main St., Boonton, NJ 07005
973.588.7190 | 973.588.7193 (fax)
www.njhighlandscoalition.org

Aliya Khan
NJDEP
401 E. State Street
Trenton, NJ 08625
By email: Aliya.Khan@dep.nj.gov

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**Re: Draft Title V Operating Permit Renewal and Permit Modification
Tennessee Gas Pipeline
Program Interest: 83405 Permit Activity Number: BOP190001**

August 8, 2022

Dear Aliya Khan:

I am writing on behalf of the 97 member organizations of the New Jersey Highlands Coalition, representing their members in a common interest to protect the natural and cultural resources of the New Jersey Highlands.

We urge you to deny the above referenced permit because: it represents an unnecessary expansion of fossil fuel infrastructure in New Jersey; the compressor station will emit more than 500 tonnes of greenhouse gases annually and introduce a number of toxic gases into the pristine environment of the Highlands Preservation Area; it poses unnecessary risks to life and property; and it is contrary to the goals and objectives of the New Jersey Energy Master Plan.

The New Jersey Board of Public Utilities (BPU), joined by the NJ Division of Rate Counsel, in a filing with the Federal Energy Regulatory Commission, found that a study adopted earlier this summer by the BPU found that New Jersey is unlikely to experience shortages in natural gas through the end of this decade.

Goal 5.4.1 of the 2020 NJ Energy Master Plan states: *Approving unnecessary infrastructure expansion would be an imprudent investment and would significantly thwart efforts to achieve climate goals.*

The permit modification is to accommodate an expansion of the natural gas pipeline's capacity by the installation of a larger capacity compressor. The increased capacity is intended for Westchester County—it will not benefit New Jersey, which according to the BPU, New Jersey has ample natural gas until at least 2030. Not only do we not need the public service utility provided by the expansion, but it is also *significantly* contrary to New Jersey's climate goals.

Further, there are known risks to health, property and life associated with compressor stations. The Jan. 1, 2022, blowdown at TGP's compressor in Wantage, NJ resulted in an uncontained release of over 600 lbs. of VOCs into populated areas. A blowdown of the Transco compressor station in Roseland, NJ, in 2013, released large amounts of gas and other chemicals into a densely populated community.

As a public utility, there might be some tradeoffs—a willingness, or requirement to accept some of the associated risks—in exchange for reliable distribution of a fuel that heats, cools, and powers many of our homes and offices. *But that is demonstrably not the case here.* This gas is not needed, it is contrary to the State’s policy goals, and it poses dangerous risks to the community.

In addition, Tennessee Gas Pipeline has not been a safe and reliable operator in New Jersey. The 300-line project and the Northeast Upgrade—which was found by the Courts to be an illegal bifurcation of a single project in order file for several permits under the thresholds that would have had increased permitting costs and higher permitting standards—have left a scar across the core forest of the Highlands Preservation Area, creating long term impacts, causing serious ecological damage to Lake Lookover and Bearfort Waters when mudslides emptied thousands of tons of sediment into these pristine lakes. The required reforestation program was a failure, still, ten years later. TGP, as part of its Comprehensive Mitigation Plan with the New Jersey Water Protection & Planning Council, was required to file annual status reports for a period of ten years on the ongoing mitigation program, failed to file reports after the first year,

It is inconceivable that the agency whose purpose is to ensure a healthy and safe environment for New Jersey residents, and to lead us with a faithful plan for adapting to the climate emergency, would approve this permit. We urge you to exercise your statutory authority to protect us by using whatever discretion you have to consider the larger issues, rather than solely the regulatory criteria.

Respectfully,



Elliott Ruga, Policy & Communications Director
New Jersey Highlands Coalition

