



New Jersey  
**Work Environment Council**  
Safe, secure jobs and a healthy, sustainable environment

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April 22, 2016

The Honorable Norman C. Bay  
FERC Chairman  
888 First Street, NE  
Washington, DC 20426

Dear Chairman Bay,

Work Environment Council of New Jersey (WEC) is writing to express concerns about the current configuration and community impacts of the proposed PennEast pipeline.

N.J.A.C 14:7-1.1 § 14:7-1.3 sets forth requirements that govern the construction, operation and maintenance of transmission and distribution pipelines for the transportation of natural gas by intrastate natural gas pipeline operators within the State of New Jersey and states that, “all natural gas pipelines constructed in New Jersey after March 2, 2009, shall meet the design standards for a Class 4 pipeline location, as set forth in 49 CFR 192.5, 192.609 and 192.611.”

Yet, high-volume **interstate** pipelines, such as the 36-inch proposed PennEast pipeline (with very high maximum allowable operating pressures of 1480 psi, large ¼ mile impact zones and ½ mile thermal impact zones) are allowed under Federal law to be built through communities in New Jersey to the lowest Class 1 location safety standards. This contradiction is noteworthy and warrants further consideration, particularly in a densely populated state like New Jersey. **WEC supports the highest safety standards**, and in the case of PennEast’s proposed pipeline, the minimum of a Class 4 designation.

According to an analysis of the Gas Research Institute’s report GRI-00/0189, conducted by Professor Robert Goldston from Princeton University:

If you are within 1500 feet of a ruptured and ignited pipeline with PennEast’s parameters, you have about 40 seconds to get to shelter from the radiant heat or you will suffer blister burns.

If you are within 750 feet, you will have about 30 seconds to find shelter or you will have a 50% chance of mortality.

PHMSA considers the high consequence area to be within 950 ft for PennEast. This is where you have a 1% chance of mortality at 30 seconds, and a 50% chance of mortality at 60 seconds.

These impacts are particularly troubling when considering the proposed pipeline route’s proximity to schools and community institutions. Both West Amwell Elementary School and the West Amwell ESC school are within the impact zone. Other community institutions, like the South

Hunterdon Library, also fall within the impact zone, despite attracting children and families on a regular basis. Other facilities that are nearby include Capital Health Hospital, Merrill Lynch and other offices. Considering the potential impact on community members, especially children within these facilities in a worst case scenario, we cannot understand why the pipeline would not be built to the highest possible safety standards. The decision to bypass an agreed upon state standard because this project is bi-state is mind-boggling. WEC strongly urges that the PennEast pipeline only be allowed to proceed if built to the safest C4 standard.

Formed in 1986, WEC is an alliance of 70 community, environmental, and labor organizations working together for safe, secure jobs and a healthy, sustainable environment. WEC links workers, communities, and environmentalists through training, technical assistance, grassroots organizing, and public policy campaigns to promote dialogue, collaboration, and joint action. WEC has a diverse board of directors composed of environmental, community, and union leaders. More information about WEC is available at [www.njwec.org](http://www.njwec.org).

Thank you for your consideration of these concerns.

Best Regards,

A handwritten signature in black ink that reads "Dan Fatton". The signature is written in a cursive style with a large, prominent "D" and "F".

Dan Fatton  
Executive Director