

Issues with Southern Reliability Link (SRL) NJDEP Applications

1. SRL's applications are not complete, especially its Freshwater Wetlands permit and its plans to use Horizontal Direction Drilling (HDD).

- NJNG has failed to submit plans concerning:
 - Complete HDD drawings with thorough “geotechnical assessments” (which determine the physical properties of soil and rock around a site)
 - Bore designs (plans for digging horizontal holes under streambeds)
 - Additional workspace required for HDD
 - HDD failure plans, including containment and cleanup of accidental discharges
- NJNG also doesn't have permission to work in the roads owned by Burlington County and the townships. It is seeking to bypass this fact, despite the rules.

2. HDD is not a solution — it poses serious issues.

- The U.S. Fish & Wildlife Service and PennEast (NJNG is a partner in PennEast) warn of the risks of “inadvertent return” (IR) during HDD.
 - IR is when drilling fluids (mud slurry used as a lubricant) unintentionally return to the surface via fractures or fissures that exist below ground.
 - Also called “frac-out,” “frack-out,” “mud-to-surface”
- IRs can spoil waterways and damage sensitive aquatic communities.
- HDD problems such as IR can occur from:
 - Rock fractures or unconsolidated geology
 - Low-density soils
 - Inadequate bore design
- HDD mud discharge can include:
 - Excessive volume of mud released, up to 10,000 gallons
 - Up to several acres of wetland impacted, and up to a mile of stream destroyed
- NJDEP must consider these risks before approving a 401 water quality certificate for SRL

3. Mud from HDD poses a risk to water, land and life.

- HDD pumps mud into waterways much faster than the natural rate — which overwhelms the system.
- Species impacted by HDD mud include fish, plants, insects, crustaceans and mollusks.
- HDD mud impacts to wetlands and streams include:
 - Driving mud deeply into the “substrate” levels of streams, where many species live, grow, and obtain nourishment
 - Smothering and displacing macroinvertebrates
 - Threatening fish spawning, rearing areas and refuge sites; interfering with fish development and function
 - Restricting use of recreational waterways
 - Interfering with stream hydrology (seasonal water level patterns, circulation, soil saturation)
- HDD is subject to failure and IRs.
 - NJDEP should not allow NJNG to use HDD without submitting detailed geotechnical studies, a drilling plan and an IR contingency plan that includes a drilling mud containment, response and notification plan.
 - Without this information, NJDEP is gambling with sensitive natural resources — including those of the New Jersey Pinelands.

4. In high-quality waters such as those that SRL would cross, HDD failures and/or IRs may impair pristine waterways that are supposed to be protected.

- SRL’s use of HDD must be evaluated by individual permit, waterway by waterway.

5. It is not appropriate for NJDEP to use “Permit by Rule” for SRL.

- NJDEP’s guidelines state that a pipeline should not cause any “disruption to streams,” yet using HDD to construct SRL could cause significant disruption.
 - SRL has dozens of stream crossings. NJDEP must consider each one to evaluate HDD’s potential impact. It cannot assume no impacts.
- Also, “Permit by Rule” should not apply to a project that has no “independent utility” — such as SRL.

SRL is an *unnecessary risk* to our communities!

Visit www.RethinkEnergyNJ.org/Take-Action to oppose SRL.