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Sandwich Water District

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SANDWICH, MASSACHUSETTS 02563-0600

Cape Cod Commission
3225 Main Street
P.O. Box 226
Barnstable, MA 02630

Re: FEIR Sagamore Line Reinforcement Project
EOEA No. 13543

To Whom it may concern:

The Sandwich Water District (the "District") has reviewed the DRI entitled "Western Segment Phase 1, Sagamore Line Reinforcement Project" submitted by Colonial Gas Company, d/b/a National Grid, and has identified in this letter its most significant concerns regarding the proposed project.

At the outset, it should be noted that the District was not formally notified or included on the circulation list for the above referenced project as required under MEPA regulations. Most likely, a similar omission in the original ENF in 2006 led to the District's exclusion from the subsequent FEIR and DRI distribution lists.

The 20 inch diameter high pressure gas line which National Grid proposes to install within the paved surface of the Service Road in the Town of Sandwich is in close proximity to the District's existing water transmission, distribution and service infrastructure, which is located within the northerly shoulder of the Service Road and crosses the Service Road in a number of locations. As such, if the gas pipeline is installed as proposed, major District transmission pipelines, hydrant branches and customer services will likely be required to be moved or relocated in order to accommodate the installation of the proposed gas main. This would result in the interruption of domestic water service and impede fire protection for areas serviced by the District's water mains.

In addition, the installation of the gas main in such close proximity to the District's water mains and appurtenances will almost certainly cause added expense to the District with respect to its future installations as well as the ongoing maintenance and repair of its present and prospective infrastructure. The proposed location of the gas main would also likely result in added risk to the District's employees and subcontractors, who would be required to work in and around the same.

To alleviate its concerns, the District requests that the location currently proposed for the 20 inch diameter high pressure gas line be redefined. Specifically, the District requests that the new location be situated within the shoulder of the north side of the Service Road, north of the District's existing transmission pipeline and with a minimum of ten feet of separation from the District's pipeline, for the following reasons:

1. The District's suggested location, which is afforded by the unusually large 100 foot wide layout for the Service Road, would offer a significantly increased level of safety for those working in and around the District's infrastructure that simply cannot be overstated.
2. The District's suggested location would ensure that required maintenance and future installations of the District's water infrastructure, as well as road drainage and other public utilities located in or near the roadway surface, would not be conducted in the vicinity of the gas main. This would help to

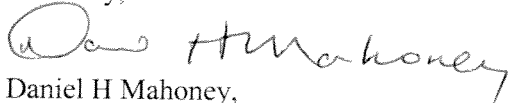
avoid accidental damage to the gas line, which in itself will enhance public, worker and gas line safety.

3. The District's suggested location would eliminate the need for the gas main to cross any of the existing District infrastructure and would eliminate the chance that its installation would cause undermining of the bedding of the District's existing water main. This would help to avoid any prolonged interruption to water service and fire protection caused by such undermining. For your information, approximately half of the District's main transmission line, (from Quaker Meeting House toward Rt. 130) is manufactured from asbestos cement. Asbestos cement pipe is very susceptible to fracture from vibration, contact by equipment or disruption of its bedding, should it be undermined during construction of the gas pipeline.
4. If the 20 inch diameter high pressure gas line is constructed as proposed, there would be undesirable elevation changes of the gas main that would increase its exposure to risk and therefore prompt the relocation of existing water infrastructure so that the gas line can be properly constructed.
5. In conversations with the Sandwich Fire Chief it was agreed that the 20 inch diameter high pressure gas line should be installed behind and north of the District's hydrant branches, as far away from the District's transmission pipeline as possible to increase the likelihood that fire protection will be available should there be a rupture of or other damage to the gas pipeline.
6. If the gas main is constructed as proposed, a gas main rupture would in all likelihood also rupture the District's existing pipelines, thus creating an untenable situation for firefighting, as well as for the repair and restoration of services for both utilities.
7. The proponent currently has two existing gas pipelines located on the southerly shoulder of the Service Road. These existing gas pipelines, taken together with the proposed location of the new gas pipeline in close proximity to the District's transmission pipeline, would further impede the District from providing maintenance, repairs and future water service connections across the Service Road. Crossing under the proposed gas pipeline to reach existing customers and to provide water to future customers will become more costly for the District and its customers. Each crossing may require back taps, directional borings, extremely deep receiving pits and temporary support for the District's water main in order to connect to the District's main through services and extensions running under what would then be three gas mains. Additionally, with some crossings the Service Road may have to be excavated in the vicinity of the proposed high pressure gas main to ensure that there would be no contact during any boring operations, etc. All these concerns would be completely eliminated if the proposed gas main is installed in the District's suggested location.

In addition to the above, the District also requests that a strip of land along the north shoulder of the Service Road, the centerline of which would be set approximately five feet off the paved surface and south of the Sandwich Hollows Golf Course, be reserved for future pipeline expansion by the District.

In sum, the proposed location of the gas main selected by National Grid may be the most economical option for it, but National Grid's proposal fails to consider the negative implications stated above to the Sandwich Water District and its customers, the residents of the Town of Sandwich. The District respectfully requests that serious consideration be given to its proposed alternate location for this gas pipeline as it believes that this in the best interest of all parties involved.

Sincerely,



Daniel H Mahoney,

Superintendent