

Christopher M. Hogan
NYS DEC - Division of Environmental Permits
625 Broadway, 4th Floor
Albany, NY 12233-1750

September 1, 2016

**RE: Dominion New Market Project Air State Facility Permit, Brookman Corners
Application ID: 4-2730-00038/0000**

Dear Mr. Hogan,

Please accept the following comments in the public record for air permits on Dominion's New Market Project, including the proposed Brookman Corners compressor station expansion in Minden, New York.

I urge the DEC to reject these permits that would enable the flow of more FRACKED GAS (112 Million cubic feet per day) into our state from Pennsylvania. The three compressor stations alone would produce 200,000 tons of greenhouse gas emissions annually. However, when burned, all of the additional gas transported in the pipeline would pump over 2 MILLION tons of additional carbon dioxide into the air each year. Add in lifecycle emissions of methane and the total greenhouse gas impact would more than double. New York said no to fracking, so why won't it say no to fracked gas?

What's more, DEC has not even required Dominion to install the best technology to reduce impacts to public health. The Brookman Corners compressor station sits at the bottom of a valley next to a creek that limits the dispersion of emissions. Its smokestack is even below the valley rim. Today the station consists of just one compressor that runs for only a few hours one day a week. However when expanded, it would have FOUR smokestacks with compressors running almost continuously. That means the amount of combustion emissions will be orders of magnitude higher. However fugitive emissions--raw methane and VOCs--will be much worse too due to Dominion's proposed use of reciprocating engine compressors, which are notoriously leaky. DEC's draft permit for Brookman Corners does not even require Dominion to install Vapor Recovery technology that could recapture those emission--despite the fact that it has been installed in a hundred compressor stations in other states and Canada. If it can be done in Texas, why not New York? DEC's draft permit doesn't require Dominion to install "Solonox" technology to reduce Nitrogen Oxide emissions on either of the turbines at Brookman Corners either, even though it's in the draft permit at the other two compressor stations in the project.

This inferior technology will expose the surrounding community to much higher levels of hazardous pollutants and carcinogens including formaldehyde, benzene, carbon monoxide, and nitrogen oxide. This disregard for the people at Brookman Corners, many of whom are Amish and thus disconnected from the powers-that-be in Albany, is inexcusable. DEC needs to stand up for the welfare of all New Yorkers.

Again, please reject these air permits.