



PINELANDS  
PRESERVATION  
ALLIANCE



SIERRA  
CLUB

June 29, 2020

Joseph L. Fiordaliso, President  
Paul Flanagan, Executive Director  
NJ Board of Public Utilities  
44 S. Clinton Avenue  
Trenton, NJ 08625

**Re: Southern Reliability Link (SRL) Pipeline Construction Damage**

Dear Messrs. Fiordaliso and Flanagan,

We are writing on behalf of the Pinelands Preservation Alliance and the New Jersey Chapter of the Sierra Club to request the Board of Public Utilities invite the Pipeline and Hazardous Material Safety Administration (PHMSA) to assist the Board in investigating the causes, timing and impacts of the recent incident in construction of the Southern Reliability Link (SRL) pipeline.

As you are aware, on June 19<sup>th</sup> in Upper Freehold, New Jersey Natural Gas (NJNG) construction of the SRL caused damage to at least one home and a tributary of Deep Run, assertedly through an “inadvertent return” of drilling fluid from NJNG’s horizontal directional drilling (“HDD”). The incident has created immediate and irreparable injuries to people and natural resources.

We have also just learned today that NJNG had at least two prior “inadvertent return” incidents on the SRL construction that were not reported to us, despite our having submitted multiple OPRA requests to DEP for this information and received assurances there were no incidents. This new information is very disturbing, as it is now clear that neither BPU, DEP nor the Pinelands Commission did anything to investigate these incidents, report them to the public in any fashion, or ensure they did not happen again.

Now it is critical that the government determine by its own investigation the exact nature of the incident, why it happened in this place and at this time, and the full extent of the damage it has caused. It is also critical that the government actively investigate whether any other errors and damages have occurred in the construction to date. It appears from the information provided to the public so far that the June 19<sup>th</sup> incident was first reported by residents, not NJNG itself. If that is in fact the case, it would be a very serious problem and would throw doubt on the reliability of the company’s prior and future reporting.

Under the Pipeline and Hazardous Material Safety Administration certification 60105-60106 that grants the BPU inspection and enforcement authority (N.J.A.C. 14:6 and N.J.A.C. 14:7), the BPU Bureau of Pipeline Safety, under the Division of Reliability and Security, must conduct a thorough, independent investigation of the New Jersey Natural Gas SRL incident. We ask that prior incidents along the line under construction also be investigated as they suggest a disturbing pattern of errors that must be identified and remedied before any construction is

allowed to go forward. To ensure the highest possible standards are executed in a timely manner, the BPU should draw upon the expert inspection resources of the PHMSA Eastern Region Office located in West Trenton.

Sincerely,

Carleton Montgomery  
Executive Director  
Pinelands Preservation Alliance

Jeff Tittel  
Senior Chapter Director  
Sierra Club New Jersey Chapter