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Via Electronic Filing

October 11, 2019

Hon. Kathleen H. Burgess
Secretary
New York State Public Service Commission
Empire State Plaza, Agency Building 3
Albany, New York 12223-1350

Re: CASE 13-T-0538 – Application of Williams Field Services Company, LLC and DMP New York, Inc. for a Certificate of Environmental Compatibility and Public Need to Construct an Approximately 9.5-Mile Natural Gas Gathering Pipeline in the Town of Windsor, Broome County, State of New York.

CASE 10-T-0350 – Joint Petition of DMP New York, Inc. and Laser Northeast Gathering Company, LLC to Amend the Certificate in 10-T-0350 (July 25, 2012) to add two compressor units.

Order Regarding Certificates of Environmental Compatibility and Public Need:
Issued and Effective October 16, 2015 (“Order”).

Dear Secretary Burgess:

Pursuant to Ordering Clause 65 of the Order, Williams Field Services Company, LLC and DMP New York, Inc. (collectively, “Williams”), hereby submit the results of a sound compliance test as required by Ordering Clause 65(a) related to Williams’ Dunbar Compressor Station (the “Station”). The test demonstrates compliance with all standards in the Order, with one possible, but unlikely, exception. Due to the level of sound produced by insects and frogs, the test, as conducted pursuant to the Sound Testing Compliance Protocol dated January 23, 2017, cannot demonstrate compliance with the 40-dBA sound level criterion, primarily due to the fact that the ambient sound level measured when the Station was not operating was in excess of 40-dBA at all positions. As a result, Williams hereby proposes to demonstrate compliance with that criteria in the “leaf off” test already required by Ordering Clause 65.

Ordering Clause 65 requires at least two sound compliance tests conforming to the Sound Testing Compliance Protocol required by Ordering Clause 64. One test is required during the “leaf-off” season and one during the “leaf-on” season. The first test is required to be submitted within 60 days of the commencement of operations of the expanded compressor

station. The second test is required to be performed and reported to the Secretary within 12 months after the start of operations of the expanded compressor station.

Submitted herewith are the following documents: (1) the Compliance Sound Test Report Number 3972 (the “Report”) from Williams’ acoustical consultant, Hoover & Keith, Inc. (“H&K”), which contains the results of the first test, performed on October 2, 2019 pursuant to the Sound Testing Compliance Protocol during “leaf on” conditions, and (2) a cover Memorandum from H&K accompanying the Report (the “Memorandum”), which provides additional information related to the first test performed on October 2, 2019. A brief description of each is provided for below.

1. Compliance Sound Test Report Number 3972

As set forth in more detail in the Report, the test performed on October 2, 2019 demonstrates compliance with three of the four relevant testing criteria. First, no audible tonal sounds due to the Station operation were observed or documented in the measured data. Second, the measured data with the Station operating was significantly below the low frequency limit as stated in the Order. Finally, no perceptible vibration, rattles, or rumbles during Station operation were observed. However, due to the level of sound produced by insects and frogs, the measured data does not demonstrate if the Station is in or out of compliance with the 40-dBA sound level criterion.

As described in the Report, the measured A-wt Leq at Position 1 was 48 dB during Station Operation, 47.8 dB during Maintenance Venting, but 48.1dB during Ambient conditions. *See Report* § 11.1-11.3. The measured A-wt Leq at Position 2 was 46.3 dB during Station Operation, 43.8 dB during Maintenance Venting, but 44.1 dB during Ambient conditions. *See Report* § 12.1-12.3. For Position 3, the measured A-wt Leq was 40.6 dB during Station Operation, 40.4 dB during Maintenance Venting, but 41.1 dB during Ambient conditions. *See Report* § 13.1-13.3. For Position 4, the measured A-wt Leq was 50.6 dB during Station Operation, 50.9 dB during Maintenance Venting, but 50.4 dB during Ambient conditions. *See Report* § 14.1-14.3. These results are summarized in the below table.

	Station Operation	Maintenance Venting	Ambient
Position 1	48	47.8	48.1
Position 2	46.3	43.8	44.1
Position 3	40.6	40.4	41.1
Position 4	50.6	50.9	50.4

As demonstrated in the Report, the ambient sound levels at all four testing positions already exceed the 40-dBA limit in the Order. As indicated in the Report, this is likely a result of interference caused by insect and frog activity. In addition, the results also demonstrate that Station operation did not increase the ambient noise levels in any significant amount at any of the testing positions and, at two positions, the ambient level was higher than when the Station was operating.

2. Memorandum

In addition to the Report, H&K submitted to Williams an accompanying Memorandum that provides additional information related to the compliance test performed on October 2, 2019. In the Memorandum, H&K reiterates that the data collected during the October 2, 2019 compliance test demonstrates compliance with all criteria as set forth in the Order, with the possible exception of the 40-dBA criterion due to the level of insect activity and resulting high ambient readings (in excess of 40-dBA). However, related to the 40-dBA criterion, H&K updated its historical computer modeling simulations (which have previously been submitted by Williams) related to the Station with the sound measurements taken during the October 2, 2019 compliance test and with the new Station equipment in operation. H&K compared the overall A-weighted sound levels as measured on October 2, 2019 with insect activity present to the H&K modeled estimate of Station noise only and those results are summarized the below table.

Position	Measured Station + Background SPL on 10/2/19	Modeled A-Wt SPL for Station Only
1	48.6	30.9
2	46.3	29.7
3	40.6	31.8
4	50.6	33.6

Based upon this analysis, H&K believes that the sound level due to Station operation is less than 40-dBA at the applicable measurement locations. H&K is also confident that this belief can be demonstrated during the already required “leaf-off” test.

The Memorandum also notes that the low frequency sound levels obtained during the October 2, 2019 test are significantly lower than the limits set forth in the Order and that will be re-verified during the already required “leaf-off” survey. Lastly, the Memorandum notes that, during the October 2, 2019 test, the Station monitors documented that the sound level due to maintenance venting activity (i.e., blow down and burn down activities) are 10–15 dBA less than the sound level due to the normal Station operation.

For all of these reasons, Williams and H&K believe that compliance with the 40-dBA limit can be demonstrated in the already required “leaf off” test, which will minimize or eliminate interference due to insect and frog activity. Accordingly, Williams hereby proposes to demonstrate compliance with the 40-dBA criterion (and the other Order criteria) in the “leaf off” test already required by Ordering Clause 65. To the extent that ambient levels are in excess of 40-dBA during the “leaf off” test, Williams proposes to review the sound testing protocol with DPS Staff to determine any appropriate and necessary modifications.

Please contact the undersigned should you have any questions. Thank you.

Respectfully submitted,

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Attorneys for Williams Field Services Company, LLC
and DMP New York, Inc.

By: /s/ Konstantin Podolny
Konstantin Podolny