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May 23, 2016

Dear Governor Gina Raimondo,

We, the undersigned organizations, write you to to express our opposition to Invenergy's proposed fracked-gas power plant, dubbed the Clean River Energy Center. Despite its misleading name, the plant is anything but clean. Rather, it would lock in more demand for fracking and decades more of climate pollution. Support for this project is inconsistent with climate leadership and will move us away, rather than towards, the quick and just transition to 100 percent renewable energy that we desperately need.

The company plans on building the 700-million dollar fracked-gas power plant in the rural town of Burrillville, Rhode Island.<sup>1</sup> The town is already inundated with the toxins and noise that come from gas infrastructure. Burrillville is home to two interstate gas pipelines, two compressor stations and another natural gas-fired power plant.<sup>2</sup> The residents of Burrillville have not consented to Invenergy's proposed fracked-gas plant. Nor have the Nipmuc people whose traditional territory would be site of the proposed plant.

The plant would be constructed next to a Spectra Energy compressor station, tapping fracked gas by building lateral connections to the "Algonquin" natural gas pipeline.<sup>3</sup> The Clean River Energy Center will also be equipped to burn oil for when natural gas supplies are low.<sup>4</sup> This is a bad deal for the residents that live near the compressor station are already exposed to air and noise pollution.

Compressor stations discharge air and climate pollutants, putting the health of those living around the infrastructure at greater risk. Their emissions are a more constant source of emissions than most other industry sites, but the levels of actual emissions still vary widely from site to site.<sup>5</sup> Each year, each compressor stations emit 12-50 tons of VOCs, 51 to 99 tons of nitrogen oxides (NO<sub>x</sub>), 1.5 to 6.1 tons of particulate matter and up to 1.9 tons of sulfur dioxides (SO<sub>x</sub>).<sup>6</sup> Health problems associated with exposure to these chemicals include "respiratory, neurologic, and dermal responses as well as vascular bleeding, abdominal pain, nausea, and vomiting."<sup>7</sup>

The build-out of the Clean River Energy Center would simply exacerbate these issues, increasing air and noise pollution from increased truck traffic while the plant is being constructed and from the plant emissions once it is built.<sup>8</sup>

Furthermore, the power plant would need to use a lot of water for its operations. It will obtain groundwater from the Pascoag Utility District (PUD), tapping an unused well, previously

contaminated by MBTE, a gasoline additive now banned in Rhode Island.<sup>9</sup> Many locals are concerned about the toxicity of the steam emissions and the sewerage discharge.<sup>10</sup>

While the exact amount of water the power plant will use depends on what season it is and what type of fuel (natural gas or oil) is being burned, the annual average is 102,240 gallons of water per day.<sup>11</sup> Its peak water usage, during winter if at least one combustion turbine is burning oil instead of gas, is estimated to be as much as 924,489 gallons of water per day.<sup>12</sup> On average, Invenenergy anticipates producing 69,120 gallons of wastewater on an average day, and up to 200,160 on peak days.<sup>13</sup> That's a lot of waste.

Welcoming the Clean River Energy Center would be a dirty deal. Natural gas is mostly methane, a potent greenhouse gas, and it is leaking from every stage of the natural gas system — from well sites to processing plants and compressor stations to beneath city streets. When it comes to the relative impacts on our climate, these leaks of methane are why natural gas is about as bad as coal when used for generating electricity, and why natural gas is about as bad as oil when used to fuel cars, trucks, industrial boilers and residential furnaces.<sup>14</sup> Promoting natural gas not only will lock in decades more of fracking and contribute to the climate crisis, but it will result in billions of dollars being spent on the infrastructure to support burning gas, preventing us from moving into a sustainable energy future.

For these reasons, it's no surprise that there's been a growing trend of new fracked-gas infrastructure projects being rejected, delayed or abandoned in the Northeast.<sup>15</sup> Just this past April, New York Governor Andrew Cuomo rejected an application for a water quality permit that the Constitution Pipeline needed in order to begin construction, and Kinder Morgan had to suspend efforts to construct its Northeast Energy Direct pipeline after failing to reach customer agreements.<sup>16</sup>

In the past, you have talked about the need for Rhode Island to be a leader in addressing climate change and the importance of addressing this challenge of our time. For example in January 2014 you said that Rhode Island should make itself “a model for the entire country when it comes to renewable energy usage and climate change preparedness.”<sup>17</sup> However, approving this dirty energy project moves Rhode Island in the opposite direction.

We strongly urge your opposition to this ill-advised proposal.

350 CT

350.org

AnastasiaThinks INC

Breast Cancer Action

Burrillville Against Spectra Expansion

Center for Biological Diversity

Climate Disobedience Center

Elders Climate Action

Environmental Action

The FANG Collective  
Food & Water Watch  
Franciscan Response to Fracking  
Friends of the Earth  
Grassroots Environmental Education  
Immanuel Congregational Church UCC Environmental Ministry Team  
Jewish Climate Action Network  
Justice Action Mobilization Network  
Justice and Peace Office of the Congregation of Notre Dame USA  
National Nurses United  
People Demanding Action  
Popular Resistance  
Progressive Democrats of America  
South Coast Neighbors United, Inc.  
Stand  
Stop the Algonquin Pipeline Expansion  
Toxics Action Center  
U.S. Climate Plan  
We Are Seneca Lake

## Endnotes

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<sup>1</sup> Kuffnew, Alex. “R.I. officials to announce \$700-million power plant in Burrillville.” *Providence Journal*. July 31, 2015.

<sup>2</sup> TransCanada. [Fact Sheet.] “Ocean State Power.” April 2013; See Federal Energy Regulatory Commission. Final Environmental Impact Statement. “Ocean State Power Project.” Vol. 1. July 1988; Ahlquist, Steve. “Burrillville Town Council claims to be powerless against Spectra, Invenergy.” *RI Future.org*. October 15, 2015; Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. “Invenergy Clean River Energy Center.” January 12, 2016 at Slide 15 and 32; Invenergy. [PowerPoint Presentation.] Local Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. “Invenergy Clean River Energy Center.” March 31, 2016 at Slide 17 and 22.

<sup>3</sup> Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. “Invenergy Clean River Energy Center.” January 12, 2016 at Slide 15 and 32; Invenergy. [PowerPoint Presentation.] Local Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. “Invenergy Clean River Energy Center.” March 31, 2016 at Slide 17 and 22; Kuffnew, Alex. “Proposed Burrillville power plant draws demonstrators.” *Providence Journal*. April 4, 2015.

<sup>4</sup> Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. “Invenergy Clean River Energy Center.” January 12, 2016 at Slide 23.

<sup>5</sup> Litovitz, Aviva et al. “Estimation of regional air-quality damages from Marcellus Shale natural gas extraction in Pennsylvania.” *Environmental Research Letters*, vol. 8 iss. 1. January-March 2013 at 5..=

<sup>6</sup> Litovitz, Aviva et al. “Estimation of regional air-quality damages from Marcellus Shale natural gas extraction in Pennsylvania.” *Environmental Research Letters*, vol. 8 iss. 1. January-March 2013 at 5.

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- <sup>7</sup> Brown, David et al. "Understanding exposure from natural gas drilling puts current air standards to the test." *Reviews on Environmental Health*. Preprint, published online March 2014 at 3; U.S. EPA. Office of Air and Radiation (OAR). "Regulatory Impact Analysis: Final New Source Performance Standards and Amendments to the National Emissions Standards for Hazardous Air Pollutants for the Oil and Natural Gas Industry." April 2012 at 11.
- <sup>8</sup> Faulker, Tim. "Crowded and Rowdy at Power Plant Public Hearing." *EcoRI*. April 1, 2016; See Kagel, Alyssa et al. Geothermal Energy Association. "Clearing the Air. Air Emissions from Geothermal Electric Power Facilities Compared to Fossil-Fuel Power Plants in the United States." May/June 2005.
- <sup>9</sup> Fitzgerald, Joseph. "Pascoag Utility District offers new details on plan to utilize old wells." *The Call*. October 16, 2015; "MTBE ban good for water supply." *Providence Business News*. August 27, 2005.
- <sup>10</sup> Faulker, Tim. "Crowded and Rowdy at Power Plant Public Hearing." *EcoRI*. April 1, 2016.
- <sup>11</sup> Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. "Invenergy Clean River Energy Center." January 12, 2016 at Slide 33.
- <sup>12</sup> Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. "Invenergy Clean River Energy Center." January 12, 2016 at Slide 33.
- <sup>13</sup> Invenergy. [PowerPoint Presentation.] Preliminary Hearing. Energy Facility Siting Board. Docket Number SB-2015-06. "Invenergy Clean River Energy Center." January 12, 2016 at Slide 33.
- <sup>14</sup> See Food & Water Watch. [Report.] "The Urgent Case for a Ban on Fracking." February 2015.
- <sup>15</sup> Glick, Ted. "Ten Fracking Infrastructure Projects Canceled or Delayed in the Last 24 Months." *EcoWatch*. April 27, 2016.
- <sup>16</sup> Solomon, Dave. "Kinder Morgan pipeline project suspended." *New Hampshire Union Leader*. April 21, 2016; Waldman, Scott. "Cuomo administration rejects Constitution pipeline." *Politico New York*. April 22, 2016.
- <sup>17</sup> VoteSmart.org. "Issue Position: The Environment." Accessed May 2, 2016, available at [https://votesmart.org/public-statement/892345/issue-position-the-environment#.Vyex\\_ZMrKqk](https://votesmart.org/public-statement/892345/issue-position-the-environment#.Vyex_ZMrKqk)