

STATE OF MICHIGAN
DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30755
LANSING, MICHIGAN 48909

DANA NESSEL
ATTORNEY GENERAL

August 5, 2019

Federal Energy Regulatory Commission
Attn: Kimberly D. Bose, Secretary
888 First Street, N.E.
Washington, D.C. 20426

RE: FERC Docket Nos. CP19-471-000
*Bluewater Gas Storage, L.L.C.'s (Bluewater) Bluewater Compression Project
in Macomb County Michigan*

Dear Commissioners:

As the Chief Consumer Advocate for Michigan residents, the Attorney General intervenes and provides comments at the Michigan Public Service Commission as well as the Federal Energy Regulatory Commission to ensure that residents receive safe and affordable energy.

After reviewing Bluewater's application to construct and maintain a new compressor station in Macomb County, as well as the extensive comments by nearby residents, the Attorney General is concerned about the safety of the residents living close to the compressor. As noted in the filed comments on FERC's docket, there have been several natural gas safety incidents involving natural gas compressors, some involving explosions and damage to the surrounding areas.

Naturally, the nearby residents are asking for additional safety measures regarding Bluewater's Compression Project. One such measure is the addition of a larger earthen berm around the compressor site that would provide a buffer or contain any on-site explosion. Not only is this a commonsense safety consideration, it is also an esthetic benefit to the community.

In its May 23rd application, Bluewater states that "it is committed to working cooperatively with landowners and other stakeholders to address their concerns and mitigate adverse impacts wherever practicable" and that "Bluewater's goal is to negotiate mutually acceptable agreements with any impacted landowners or other stakeholders, . . ." This request for a larger earthen berm by impacted landowners and other stakeholders, is exactly the type of measure that Bluewater has committed to consider.

Accordingly, the Attorney General requests that FERC hold Bluewater to the commitment in its filed application and order Bluewater to cooperatively work with the

surrounding residents to resolve this safety concern, along with any other reasonable measures.

Sincerely,

A handwritten signature in black ink, appearing to read "m. moody", with a stylized flourish at the end.

Michael E. Moody
Division Chief
Special Litigation Division
MI Department of Attorney General
On behalf of Michigan Attorney General
Dana Nessel
(517) 335-7627