

William R. Burns, Esq. – Attorney Identification Number 018892001  
Capehart and Scatchard  
142 West State Street  
Trenton, NJ 08608  
P. 609.394.2400  
F. 609.394.3470  
wburns@capehart.com  
Attorneys for the Burlington County Board of Chosen Freeholders

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APR 22 2015

BOARD OF PUBLIC UTILITIES  
MAIL ROOM

**STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES**

**IN THE MATTER OF THE PETITION OF  
NEW JERSEY NATURAL GAS COMPANY  
FOR DETERMINATION CONCERNING THE  
SOUTHERN RELIABILITY LINK PURSUANT TO  
N.J.S.A. 40:55D-19 AND N.J.S.A. 48:9-25.4**

**DOCKET NO. G8715040403**

**BRIEF IN SUPPORT OF THE BURLINGTON COUNTY BOARD OF CHOSEN  
FREEHOLDERS IN SUPPORT OF THE NOTICE OF MOTION TO INTERVENE  
PURSUANT TO N.J.A.C. 1:1-16.1**

William R. Burns, Esquire  
Capehart Scatchard  
142 West State Street  
Trenton, New Jersey 08608  
Attorneys for the Burlington County Board of Chosen Freeholders

William R. Burns, Esquire  
On the Brief

## PROCEDURAL HISTORY

The New Jersey Natural Gas Company filed a petition with the New Jersey Board of Public Utilities in for Determination concerning the Southern the Reliability Link pursuant to N.J.S.A. 40:55D-19 and N.J.S.A. 48:9-25.4 on or about April 2, 2015. The petition seeks to construct a large intrastate natural gas pipeline in and on Burlington County Board of Chosen Freeholder property, in the Right of Way of Burlington County Board of Chosen Freeholder Roads. The proposed pipeline will be used to transport natural gas through Burlington County. The Burlington County Board of Chosen Freeholders is a body politic and has administrative offices located at 49 Rancocas Road in Mount Holly, New Jersey.

## STATEMENT OF FACT

The Burlington County Board of Chosen Freeholders (“Burlington County”) has a unique interest in the outcome of this proceeding. As detailed in the attached certification of Joseph T. Brickley, P.E., the County will be directly, adversely and significantly impacted by the project. Briefly, the project will have severe impact on County roads, County travel, will increase the cost of construction to improve the roads thereby negatively impacting the County’s budget and potentially impacting County taxpayers. Currently, the interests of Burlington County are not adequately represented by any other party in this action. Further as New Jersey Natural Gas has not submitted to the County pursuant to N.J.S.A. 48:9-25.4 for route designation this application could have precedential effect on matters involving Burlington County. Finally, Burlington County, due to its experience and history of coordinating projects with other utilities the County’s full participation in this matter is likely to add constructively to the proceeding.

## STATEMENT OF LAW

In ruling on a motion to intervene, N.J.A.C. 1:1-16.3(a) requires that the decision maker, in this instance the Board of Public Utilities consider the following factors:

1. The nature and extent of the moving party's interest in the outcome of the case;
2. Whether that interest is sufficiently difference from that of any other party so as to add measurably and constructively to the scope of the case;
3. The prospect for confusion and delay arising from the inclusion of the party, and
4. Other appropriate matters.

The Board of Public utilities has stated in previous proceedings, application of these standards involves an implicit balancing test.

The need and desire for development of a full and complete record, which involves consideration of a diversity interests, must be weighed against the requirements of the New Jersey Administrative Code, which recognizes the need for prompt and expeditious administrative proceedings by requiring that an intervenor's interest be specific, direct and different from that of the the other parties so as to add measurably and constructively to the scope of the case. Order In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Extension of a Solar Generation Investment Program and Associated Cost Recovery Mechanisms and for Changes in the Tariff for Electric Service BPUNJ No. 15 Pursuant to N.J.S.A.48:2-21, 48:2-21.1 and N.J.S.A. 48:3-98.1 Docket E012080721 (January 9, 2013) citing Docket No. EM05020106 (June 8, 2005).


In the current matter Burlington County has a significant interest in the outcome of the case as the project will be constructed, in large part in Burlington County and on County property and in the County Right of Way. Moreover, the County to date has not designated nor be given the opportunity to designate the route. This project will impact not only County roads but County facilities, agencies, budgets, residents, taxpayers and the County's ability to provide services. Burlington County's interest in this project is sufficiently different from that of New Jersey Natural Gas and other parties, as Burlington interests deal with the impact both present and future on County infrastructure, the County's ability to improve roads, maintain and provide services, develop and improve communities, develop responsible budgets and improve utility services including natural gas in Burlington County. Granting Burlington County's motion will not cause confusion or delay, rather allowing Burlington County to intervene, based on the skill,

knowledge, the County possess with regard to the County roads and property and as well as the County's experience in coordinating prior utility buildouts may expedite the proceedings. As indicated in the application New Jersey Natural Gas is seeking to construct a large pipeline across three counties that will or at least has the potential to affect large groups of interested people. The Board of Public Utilities in previous orders has "encouraged full participation in proceedings that have the potential to affect large groups of interested parties to ensure that a full record is created." Id. The totality of the circumstances and the interest of justice warrant that the Burlington County Board of Chosen Freeholder's motion to intervene be granted.

### **CONCLUSION**

The Burlington County Board of Chosen Freeholder's respectfully request that the Board of Public Utilities grant its motion to intervene in the above captioned matter.

Respectfully submitted,  
**CAPEHART SCATCHARD**

By:   
William R. Burns  
Attorney for Burlington County  
Board of Chosen Freeholders.

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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

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MAIL ROOM

IN THE MATTER OF THE PETITION OF  
NEW JERSEY NATURAL GAS COMPANY  
FOR APPROVAL AND AUTHORIZATION  
TO CONSTRUCT AND OPERATE THE  
SOUTHERN RELIABILITY LINK  
PURSUANT TO N.J.A.C. 14:7-1.4

NOTICE OF  
MOTION TO INTERVENE  
BY BURLINGTON COUNTY  
BOARD OF CHOSEN  
FREEHOLDERS

DOCKET NO. G015040402

TO:

Kenneth Sheehan  
Chief of Staff/Secretary  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Jim Guliano  
Director-Reliability and Security  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, NJ 08625-0350

Paul Flannagan  
Executive Director  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Michael Stonack  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, NJ 08625-0350

Cynthia Covie  
Chief Counsel  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Eric Weaver  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Jerome May  
Director-Energy  
NJ Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Maria Zazzera  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Rachel Brekke  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Rhaman Johnson  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Stefanie A. Brand, Esq.,  
Director New Jersey Division of Rate  
Counsel 140 East Front Street 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Brian Lipman  
New Jersey Division of Rate Counsel  
140 East Front Street 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Felicia Thomas-Friel, Esq.  
New Jersey Division of Rate Counsel  
140 East Front Street — 4th Floor  
P.O. Box 003  
Trenton, NJ 08625

Caroline Vachier, DAG  
Section Chief  
Public Utilities Section  
124 Halsey Street  
P.O. Box 45029  
Newark, NJ 07101

Babette Tenzer  
Division of Law  
124 Halsey Street P.O. Box 45029  
Newark, NJ 07101

Jeffrey S. Chiesa, Esq.  
Wolff & Samson PC  
One Boland Drive  
West Orange, NJ 07052

John G. Valeri Jr., Esq.  
Wolff & Samson PC  
One Boland Drive  
West Orange, NJ 07052

Heather Azoulay  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

John McCarvill  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Greg Reinert  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Michael Rebuck  
N.J. Board of Public Utilities  
44 South Clinton Avenue, 9th Floor  
Post Office Box 350  
Trenton, New Jersey 08625-0350

Alex Moreau, DAG  
Division of Law  
124 Halsey Street  
PO Box 45029  
Newark, NJ 07101

Christopher Psihoules, DAG  
Division of Law  
124 Halsey Street  
PO Box 45029  
Newark, NJ 07101

Mark R. Sperduto  
New Jersey Natural Gas Company  
1415 Wyckoff Road  
P.O. Box 1464  
Wall, NJ 07719

Michael K. Plumb, Esq.  
Wolff & Samson PC  
One Boland Drive  
West Orange, NJ 07052

Matthew J. Korke,  
Paralegal Wolff & Samson PC  
One Boland Drive  
West Orange, NJ 07052

Alice Good  
Chief, Environmental and  
Real Property Law  
2901 Falcon Lane  
Joint Base McGuire-Dix-Lakehurst, NJ  
08641

Eve Cullinan  
Burlington County Administrator  
49 Rancocas Road, Room 108  
Mount Holly, NJ 08060

Carl W. Block  
Ocean County Administrator  
101 Hooper Avenue  
Toms River, NJ 08754-2191

Teri O'Connor  
Monmouth County Administrator  
Hall of Records  
1 East Main Street  
Freehold, NJ 07728

Dana L. Tyler  
Upper Freehold Township Clerk  
314 Route 539  
Cream Ridge, NJ 08514

Anne Marie Eden, R.M.C.  
Jackson Township Clerk  
95 W. Veteran's Highway  
Jackson, NJ 08527

Andrew Dembia, Esq.  
New Jersey Natural Gas Company  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Craig Lynch  
New Jersey Natural Gas Company  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Keith Sturn  
New Jersey Natural Gas Company  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Mariellen Dugan, Esq.  
New Jersey Resources Corporation  
Legal Department  
1415 Wyckoff Road  
PO Box 1464  
Wall, NJ 07719

Caryn M. Hoyer  
Chesterfield County Clerk  
300 Bordentown-Chesterfield Road  
Chesterfield, NJ 08515

Cindy Dye  
North Hanover Township Clerk  
41 Schoolhouse Road  
Jacobstown, NJ 08562

Dorothy J. Hendrickson, R.M.C.  
Plumsted Township Clerk  
121 Evergreen Road  
New Egypt, NJ 08533

Sabina T. Skibo, R.M.C., C.M.R., C.P.M.  
Manchester Township Clerk  
1 Colonial Drive  
Manchester, NJ 08759

PLEASE TAKE NOTICE that, on \_\_\_\_\_, 2015 at 9:00 a.m. or as soon thereafter as counsel may be heard, the undersigned, attorneys for the Burlington County Board of Chosen Freeholders, pursuant to N.J.A.C. 1:1-16.1, "Any person or entity not initially a party, who has a statutory right to intervene or who will be substantially, specifically, and directly affected by the outcome of a contested case, may on motion, seek leave to intervene" shall apply to the New Jersey Board of Public Utilities at the New Jersey Board of Public Utilities 44 South Clinton Avenue, 9th Floor, as a party who has a statutory right to intervene and/or as a party who will be substantially, specifically and directly affected by the outcome, to intervene in the above captioned proceeding, for an Order permitting The Burlington County Board of Chosen Freeholders, ("County") to intervene.

PLEASE TAKE FURTHER NOTICE that this Notice of Motion is being filed in accordance with N.J.A.C.1:1-16.1, 1:1-16.2, and 1:1-16.3;

PLEASE TAKE FURTHER NOTICE that the Burlington County Board of Chosen Freeholders waives oral argument unless timely opposition is received.

PLEASE TAKE FURTHER NOTICE that the Burlington County Board of Chosen Freeholders shall rely upon the attached Certification of Joseph T. Brickley, P.E. and brief.

By:



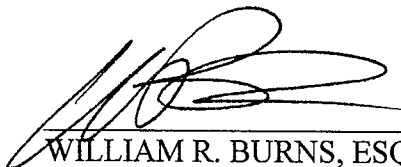
WILLIAM R. BURNS, ESQ.  
NJ Attorney ID #: 018892001  
CAPEHART SCATCHARD, P.A.  
142 West State Street  
Trenton, New Jersey 08608  
[wburns@capehart.com](mailto:wburns@capehart.com)  
T. 609.394.2400  
F. 609-394-34701  
Attorneys for The Burlington County Board  
of Chosen Freeholders



I hereby certify that a copy of the within Notice of Motion and supporting documents were served upon all parties within the time prescribed by New Jersey Administrative Code.

Dated: April 22, 2015

By:



---

WILLIAM R. BURNS, ESQ.  
NJ Attorney ID #: 018892001  
CAPEHART SCATCHARD, P.A.

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STATE OF NEW JERSEY  
BOARD OF PUBLIC UTILITIES

APR 22 2015

BOARD OF PUBLIC UTILITIES  
MAIL ROOM

**IN THE MATTER OF THE PETITION OF  
NEW JERSEY NATURAL GAS COMPANY  
FOR APPROVAL AND AUTHORIZATION TO  
CONSTRUCT AND OPERATE THE SOUTHERN  
RELIABILITY LINK PURSUANT TO N.J.A.C.  
14:7-1.4**

**CERTIFICATION OF JOSEPH T.  
BRICKLEY, P.E. IN SUPPORT  
OF BURLINGTON COUNTY  
BOARD OF CHOSEN  
FREEHOLDERS' MOTION TO  
INTERVENE**

**DOCKET NO. G015040402**

Joseph T. Brickley, P.E., being of full age certifies as follows:

1. I am a licensed professional engineer and have been dully appointed County Engineer for the Burlington County Board of Chosen Freeholders ("County") for five years.
2. The facts set forth herein are true and correct based upon personal knowledge and/or to the best of my information and belief.
3. I am fully familiar with the facts and circumstances surrounding the above captioned application submitted by New Jersey Natural Gas, and have reviewed the application and exhibits filed by New Jersey Natural Gas with the New Jersey Board of Public Utilities.
4. On April 2, 2015, New Jersey Natural Gas Company ("NJNG") filed an application with The New Jersey Board of Public Utilities pursuant to N.J.A.C. 14:7-1.4(a) seeking approval to install and operate approximately 28 miles of 30-inch transmission pipeline with a maximum allowable operating pressure of 722 pounds per square inch gauge that will be located in portions of Burlington, Monmouth and Ocean Counties.
5. The proposed pipeline will transport natural gas through Burlington County.

6. NJNG is proposing to locate a major intrastate gas transmission pipeline on Burlington County owned land within the right of way ("ROW") of Burlington County Routes 528 and 664 in Chesterfield Township and North Hanover Township.
7. The County, the residents, adjacent property owners and tax payers of Burlington County will be substantially, specifically, and directly affected by the outcome of the aforementioned application pending before the New Jersey Board of Public Utilities.
8. Both County Routes 528 and 664 are County Roads administered, controlled, operated, serviced and owned by Burlington County.
9. Both County Routes 528 and 664 ("Routes") are generally unimproved roads that have numerous design deficient including inadequate drainage and a substandard cross-section.
10. These routes are limited by a narrow ROW that was established in the early 1800s with no plan or consideration for accommodating future utilities, including natural gas transmission pipelines. Neither route meets current County or State Department of Transportation standards.
11. The primary function of the County ROW is to service the County Road, any use of the ROW for utilities is subordinate to the public's use of the ROW.
12. Hosting the proposed natural gas transmission pipeline in the narrow County roadway's right of way negatively impacts the County's ability to plan, design and construct future roadway safety improvements which will ultimately result in higher project costs to Burlington County tax payers and will significantly impact the County's budget.
13. Specific costs related to hosting the pipeline in the County ROW that substantially, specifically, and directly affect the County include :

- a. Additional costs to the County for acquisition of property to increase the size of the ROW for roadway drainage improvements. Due to the existing narrow ROW, future drainage designs will become very complex and will need to be modified and expanded due to the loss of usable ROW as a result of the intrastate transmission pipeline.
- b. Increased costs to the County for engineering and construction improvements around and adjacent to a large intrastate natural gas transmission pipeline.
- c. Additional costs to the County for future road construction as the County will be required to employ specialized construction techniques and monitoring to ensure the safe operation and protection of the pipeline.
- d. Reduced rates of production by contractors performing work around the pipeline, resulting in higher labor costs ultimately borne by the County and its taxpayers.
- e. Increased project costs due to a limited pool of qualified contractors who will undertake and perform work in close proximity to a large intrastate transmission pipeline. In addition, those contractors will be required to have extremely high limits of insurance coverage at an increased cost which will ultimately be borne by the County and its taxpayers.
- f. Increased costs and construction delays for future roadway construction due to NJNG's inability to take the transmission pipeline out service for relocation while maintaining adequate gas service to its customers in Monmouth and Ocean Counties.

- g. Future pipeline relocation work to accommodate roadway construction in all likelihood will require BPU approval resulting in increased engineering costs and construction delays. BPU approval may require that relocation is not permitted without the condemnation and acquisition of additional ROW.
  - h. The high cost associated with relocating a major intrastate gas transmission pipeline will result in increased roadway construction costs and delays.
  - i. Future roadway maintenance and repair projects undertaken by Burlington County will incur additional costs to coordinate with NJNG to accurately locate the pipeline, perform test pits, conduct survey work and perform traffic control.
14. The impacts described above will drastically increase the cost of planning, engineering, construction and maintenance of future roadway improvement projects by 25-50%. Clearly, the application currently pending before the Board will substantially, specifically, and directly impact the County. Simply, the County's fiscal integrity will be directly impacted by the proposed project.
15. The existing County Road right-of-way for Routes 528 and 664 is currently occupied by various utility companies to provide utility service to residents of Burlington County and specifically those residents and property owners along the Routes. Local utility service for gas, water and sewer has been planned but not been fully constructed to serve the existing communities.
16. The construction by NJNG of an intrastate transmission pipeline, within the constrained ROW of Routes 528 and 664, will interfere with the future expansion of utilities to adjacent residents, homes, businesses and communities.

17. Planning, engineering and constructing the expansion of water, sewer and gas along the route will become very complex and may no longer be feasible due to the loss of usable ROW that has now been dedicated to hosting an intrastate pipeline.
18. Due to NJNG's intrastate pipeline and the standard of care associated with working in close proximity to a high pressure natural gas transmission pipeline, homeowners and local utility suppliers will incur increased costs for utility expansion. In all likelihood these increased costs will be passed on to the residents, consumers and the County using the utilities.
19. To mitigate this impact and burden on the adjacent homeowners and local utility companies, it may be necessary for NJNG to fund the expansion of utilities including water, gas and sewer as previously planned along County Routes 528 and 664. This issue, which has not been addressed by the applicants, will substantially, specifically, and directly impact the residents, taxpayers of Burlington County and the County.
20. N.J.A.C. Title 14:7-1.8 requires New Jersey Natural Gas (NJNG) to comply with the standards and requirements of the agency or authority having jurisdiction of the ROW. County Routes 528 and 664 are under the jurisdiction of the Burlington County Board of Chosen Freeholders. The Petition Plans submitted by NJNG do not comply with the current practices and requirements of Burlington County for the following reasons:
  - a. For longitudinal installations of pipelines within roadway ROW, such pipelines shall be located at or immediately adjacent to the outer limit of the ROW. In placing the pipeline within the paved roadway, NJNG did not conform to County's requirement or the NJDOT's requirements of N.J.A.C. Title 16, thereby directly affect the County's ability to administered and govern County roads. As

a result, the Petition Plans fail to accurately detail the distance of the pipeline from occupied structures and in many cases homes will in fact be closer to the pipeline than detailed on the Plans. The proximity of the pipeline will have a substantial, specific, and direct impact on the County, and the residents and tax payers along the route.

- b. There has been no consideration in the Petition given to construction-related traffic impacts. The Petition Plans show HDD, bore pits located mostly located in the middle of the County road at the expense of the residents and traveling public who will endure long-term road closures.
- c. Considering County requirements that roadwork only occur between the hours of 9:00 a.m. and 3:00 p.m. Monday through Friday this project will take multiple years to complete and will directly impact Burlington County, the motorists and pedestrian's traveling the routes and the adjacent residents and taxpayers. Simply the public will be significantly and adversely impacted by this proposal and the residents and taxpayers of Burlington County and the County will shoulder the vast majority of the burden.
- d. The Petition Plans do not detail how NJNG will mitigate the impacts of hosting a major gas transmission pipeline in the County's ROW. On past projects, utility companies, including NJ American Water and Williams TRANSCO (*NJ Turnpike 6 to 9 Widening*), have detailed how they intend to mitigate the impacts and have constructed road improvements to mitigate their impacts to the County roads and ROW.

e. It appears from the petition plans that NJNG is proposing to locate their pipeline and apparatus in direct conflict with present and future supply lines of water, gas and sewer. The intrastate transmission pipeline will affect existing and future local utilities and their expansion, thereby substantially, specifically, and directly impacting adjacent property owners, residents, taxpayers and the County.

21. No application has been made to Burlington County by New Jersey Natural Gas (NJNG) for route designation, pursuant to N.J.S.A. 48:9-25.4. The County must have the opportunity to review, discuss and resolve the route designation issue as the Route the decision will have a direct, substantial, and specific impact on the residents, taxpayers and County of Burlington, and the County will be forced to shoulder the majority of that impact. It is respectfully submitted, that that County has a statutory right pursuant to N.J.S.A. 48:9-25.4, as the route has not be designated to be an intervener in this matter.
22. The use of an alternate alignment through existing utility ROW and/or preserved farmland has not been adequately investigated or documented in the Petition. Any use of preserved farmland, and/or County property including the ROW and beyond will substantially, specifically, and directly impact adjacent landowners and the County. NJNG, at least at this time, has decided to locate the pipeline in the ROW. The residents of Burlington County and the County will be substantially, specifically, and directly impacted by the proposed route.
23. Though New Jersey Natural Gas is aware of the County's roadwork requirements the petition and plans fail to adequately address construction related traffic impacts. The motorist on the routes, resident and taxpayers and the County will be substantially, specifically, directly, and adversely affected by the traffic impact. Traffic impacts should



be a major component of the Petition for Construction and Operation and the BPU should require NJNG to address this issue with the County and impacted Municipalities prior to approving any Petitions.

24. NJNG does not include information regarding sections of proposed roadway closures and associated detours. Due to the nature of the project area, limited detour route options exist. The County has investigated several detour scenarios along the project route. The detours are up to 6.45 miles in length and use mainly roads under municipal jurisdiction. These local roads are not designed to accommodate the 6300+ vehicles that use County Route 528 and 664 daily. Additionally, many of these roads have substandard geometry and may also have weight restrictions in place. The motorists and pedestrians who use the proposed routes and the proposed detours will along with County taxpayers and residents and the County will be substantially, specifically, directly and adversely impacted the proposed project.

25. In order to close a County Road, approval from the Burlington County Board of Chosen Freeholders is required. To date, NJNG has not requested or obtained such approval. Approvals from Chesterfield Township and/or North Hanover Township are required to use municipal roads for detours and/or for the closure of municipal roads. To date, NJNG has not obtained such approvals. Additionally, approval from the County is required to use a County Road as part of a detour. To date, NJNG has not requested or obtained any such approval. The County requires work to be performed under one lane alternating traffic (lane closure). The Permit Plans do not include information regarding work zone traffic control. The County and County agencies including the Department of

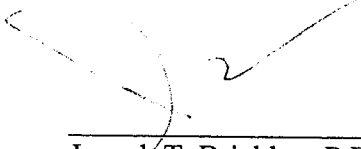
Roads and the Sheriff Department will be directly and substantially impacted by this project.

26. The County's standard for allowing work within the ROW is from 9:00 a.m. to 3:00 p.m. Monday through Friday. The Petition Plans do not contain nor has NJNG provided information regarding proposed working hours.
27. It appears that NJNG's optimum production (working with full roadway closures with no restrictions on working hours) will be 300 feet per day per crew. NJNG have also stated that working under restricted hours with alternating traffic, will take six times longer to complete the project. The length of the proposed route in Burlington County is seven miles. Of those seven miles, only 2800 feet is outside of the County right-of-way. Therefore, New Jersey Natural Gas is proposing to construct 34,160 feet of pipeline within County roadway ROW. At 300 feet per day of production, it will take 23 weeks to complete the project with no restrictions. At six times the optimum rate of production, NJNG will be impacting County Roads for over 2.5 years. The proposed project and specifically the issues related to traffic, county road closures and detours substantially, specifically, and directly impact Burlington County.
28. The Petition states that there are to be multiple construction crews working simultaneously on different sections of the project. NJNG has not provided, nor do the Petition Plans provide, information regarding the starting point and/or progression of construction activities. This appears to require multiple lane closures occurring concurrently, which will substantially, specifically, and directly impact Burlington County. It is important to note that Burlington County has not permitted multiple lane closures occurring concurrently all lane closures and specifically the implied multiple

lane closures by the applicant will substantially, specifically and directly impact the County.

29. Petition Plans show the use of the horizontal directional drill (HDD) method of construction to avoid impacts to wetlands, bridges and other structures along the project route. However, Petition Plans show bore pits located in the center of the roadway in different locations, which will necessitate road closures. Additionally, no information regarding the required footprint of the construction operation (area of bore pit and length needed for pullback) is provided on the plans. Again the County will be adversely impacted by the application and proposed road closures.
30. The construction of this pipeline will have a tremendous negative impact on motorists, including County employees and vehicles, using the County's road network. Over 6300 vehicles daily will have to endure excessive delay due to construction activities for over 2.5 years.
31. Based on the foregoing it is respectfully submitted that the residents, taxpayers, employees of Burlington County, and the Board of Chosen Freeholders of Burlington will be substantially, specifically, and directly affected by the outcome of the pending application as such seek leave to intervene. Moreover, pursuant to N.J.S.A. 48:9-25.4, as the County has not been afforded the opportunity to designate the route, the County has a statutory right to intervene in this matter.

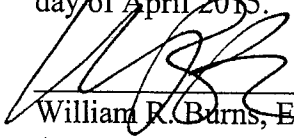
I hereby certify that all of the foregoing statements are true and correct to the best of my knowledge information and belief and that if any of the statements of fact contained herein are willfully false I am subject to punishment.



---

Joseph T. Brickley, P.E.

Sworn to and subscribed  
Before me on this the 22<sup>nd</sup>  
day of April 2015.



---

William R. Burns, Esq.  
Attorney at Law  
State of New Jersey  
NJ Attorney ID # 018892001

William R. Burns, Esq. – Attorney Identification Number 018892001  
Capehart and Scatchard  
142 West State Street  
Trenton, NJ 08608  
P. 609.394.2400  
F. 609.394.3470  
wburns@capehart.com  
Attorneys for the Burlington County Board of Chosen Freeholders

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**STATE OF NEW JERSEY  
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TO CONSTRUCT AND OPERATE THE  
SOUTHERN RELIABILITY LINK  
PURSUANT TO N.J.A.C. 14:7-1.4**

**DOCKET NO. G015040402**

**BRIEF IN SUPPORT OF THE BURLINGTON COUNTY BOARD OF CHOSEN  
FREEHOLDERS IN SUPPORT OF THE NOTICE OF MOTION TO INTERVENE  
PURSUANT TO N.J.A.C. 1:1-16.1**

William R. Burns, Esquire  
Capehart Scatchard  
142 West State Street  
Trenton, New Jersey 08608  
Attorneys for the Burlington County Board of Chosen Freeholders

William R. Burns, Esquire  
On the Brief

## PROCEDURAL HISTORY

The New Jersey Natural Gas Company filed a petition with the New Jersey Board of Public Utilities for approval and the authorization to construct and operate the Southern Reliability Link pursuant to N.J.A.C. 14:7-1.4 on or about April 2, 2015. The petition seeks to construct a large intrastate natural gas pipeline in and on Burlington County Board of Chosen Freeholder property, in the Right of Way of Burlington County Board of Chosen Freeholder Roads. The proposed pipeline will be used to transport natural gas through Burlington County. The Burlington County Board of Chosen Freeholders is a body politic and has administrative offices located at 49 Rancocas Road in Mount Holly, New Jersey.

## STATEMENT OF FACT

The Burlington County Board of Chosen Freeholders (“Burlington County”) has a unique interest in the outcome of this proceeding. As detailed in the attached certification of Joseph T. Brickley, P.E., the County will be directly, adversely and significantly impacted by the project. Briefly, the project will have severe impact on County roads, County travel, will increase the cost of construction to improve the roads thereby negatively impacting the County’s budget and potentially impacting County taxpayers. Currently, the interests of Burlington County are not adequately represented by any other party in this action. Further as New Jersey Natural Gas has not submitted to the County pursuant to N.J.S.A. 48:9-25.4 for route designation this application could have precedential effect on matters involving Burlington County. Finally, Burlington County, due to its experience and history of coordinating projects with other utilities the County’s full participation in this matter is likely to add constructively to the proceeding.

## STATEMENT OF LAW

In ruling on a motion to intervene, N.J.A.C. 1:1-16.3(a) requires that the decision maker, in this instance the Board of Public Utilities consider the following factors:

1. The nature and extent of the moving party's interest in the outcome of the case;
2. Whether that interest is sufficiently difference from that of any other party so as to add measurably and constructively to the scope of the case;
3. The prospect for confusion and delay arising from the inclusion of the party, and
4. Other appropriate matters.

The Board of Public utilities has stated in previous proceedings, application of these standards involves an implicit balancing test.

The need and desire for development of a full and complete record, which involves consideration of a diversity interests, must be weighed against the requirements of the New Jersey Administrative Code, which recognizes the need for prompt and expeditious administrative proceedings by requiring that an intervenor's interest be specific, direct and different from that of the the other parties so as to add measurably and constructively to the scope of the case. Order In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Extension of a Solar Generation Investment Program and Associated Cost Recovery Mechanisms and for Changes in the Tariff for Electric Service BPUNJ No. 15 Pursuant to N.J.S.A.48:2-21, 48:2-21.1 and N.J.S.A. 48:3-98.1 Docket E012080721 (January 9, 2013) citing Docket No. EM05020106 (June 8, 2005).

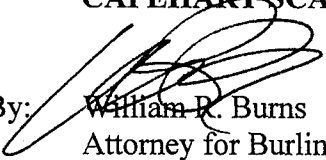
In the current matter Burlington County has a significant interest in the outcome of the case as the project will be constructed, in large part in Burlington County and on County property and in the County Right of Way. Moreover, the County to date has not designated nor be given the opportunity to designate the route. This project will impact not only County roads but County facilities, agencies, budgets, residents, taxpayers and the County's ability to provide services. Burlington County's interest in this project is sufficiently different from that of New Jersey Natural Gas and other parties, as Burlington interests deal with the impact both present and future on County infrastructure, the County's ability to improve roads, maintain and provide services, develop and improve communities, develop responsible budgets and improve utility services including natural gas in Burlington County. Granting Burlington County's motion will not cause confusion or delay, rather allowing Burlington County to intervene, based on the skill,

knowledge, the County possess with regard to the County roads and property and as well as the County's experience in coordinating prior utility buildouts may expedite the proceedings. As indicated in the application New Jersey Natural Gas is seeking to construct a large pipeline across three counties that will or at least has the potential to affect large groups of interested people. The Board of Public Utilities in previous orders has "encouraged full participation in proceedings that have the potential to affect large groups of interested parties to ensure that a full record is created." Id. The totality of the circumstances and the interest of justice warrant that the Burlington County Board of Chosen Freeholder's motion to intervene be granted.

### CONCLUSION

The Burlington County Board of Chosen Freeholder's respectfully request that the Board of Public Utilities grant its motion to intervene in the above captioned matter.

Respectfully submitted,  
**CAPEHART SCATCHARD**

By:  William R. Burns  
Attorney for Burlington County  
Board of Chosen Freeholders.