



Enbridge
5400 Westheimer Court
Houston, Texas 77056

August 9, 2018

Via E-mail and U.S. Mail

Jeffrey Crawford
Policy Development Specialist
Maine Department of Environmental Protection
Bureau of Air Quality
17 State House Station
Augusta, ME 04333

Re: Comments in Support of Maine's Petition for Removal from the Ozone Transport Region

Dear Mr. Crawford:

Enbridge Inc. ("Enbridge") is providing the following comments in support of Maine's petition to remove parts of the State from the Ozone Transport Region (OTR).


Enbridge owns and/or operates more than 15,000 miles of transmission pipelines and approximately 170 billion cubic feet of natural gas storage across North America. Among its assets, Enbridge co-owns the Maritimes & Northeast Pipeline, which includes approximately 200 miles of interstate natural gas pipeline that extends from the Canadian border to Westbrook, Maine. Maritimes & Northeast Pipeline, L.L.C. ("Maritimes") and Portland Natural Gas Transmission System ("PNGTS") are joint owners of pipeline facilities that extend from Westbrook to Dracut, Massachusetts. Facilities associated with the gas pipeline in Maine include seven compressor stations located in Baileyville, Township T35 MD, Brewer, Searsmont, Richmond, Westbrook, and Eliot. In addition to permits under Maine Site Location of Development Act, each of the compressor stations holds permits under Maine's Air Quality laws.

Maine's inclusion in the OTR imposes additional regulatory requirements that increase costs on facilities without a corresponding environmental benefit. Specifically, new or modified facilities located in the OTR may be required to install control technologies to achieve Lowest Achievable Emission Rates (LAER) and to obtain offset credits for VOCs and NOx emissions. Maine is currently in attainment with the applicable ozone National Ambient Air Quality Standards and it has been demonstrated that emissions from Maine sources do not cause or contribute to non-attainment in any other state. Imposition of LAER and the acquisition of offset credits are not required to bring Maine into attainment, and do not result in any meaningful improvement in regional air quality, and are a disincentive to investment in expansion projects and economic growth within the State.

Imposing additional regulatory burdens on Maine businesses and sources places them at a competitive disadvantage and is not necessary to achieve the objectives of the Clean Air Act or to maintain or improve Maine's air quality. We applaud the State's efforts and its ongoing work to maintain and improve air quality, and to eliminate unnecessary regulatory burdens.

Thank you for consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Goodrich", written in a cursive style.

Barry Goodrich

Air Permitting

Enbridge Inc.