



Texas Pipeline Association

Patrick J. Nugent
Executive Director

October 26, 2009

Hon. Calvin Tillman
Mayor
5413 Tim Donald Road
DISH, Texas 76247

Re: Wolf Eagle report

Dear Mayor Tillman:

As you know, the report that was recently issued by Wolf Eagle Environmental Engineers and Consultants LLC ("Wolf Eagle") has generated a good deal of public attention. The member companies of the Texas Pipeline Association are committed to ensuring that their operations are conducted in a manner that protects the public and complies with state and federal laws. Accordingly, we take seriously the issues raised in the Wolf Eagle report.

In order to fully understand the data presented and the conclusions drawn in Wolf Eagle's report, we ask that you allow us to review the underlying assumptions and methodologies used in the development of Wolf Eagle's report, so that we can better assess the conclusions reached in that report. Accordingly, we formally request that you direct Wolf Eagle to provide to us the underlying air sampling protocols, sample custody chains and lab test methods used by the lab or by Wolf Eagle to generate its September 15, 2009 report.

In addition, we have a number of questions concerning the use of certain technical terms and assumptions in the report. As the report was commissioned by and conducted for the benefit of DISH, we felt these questions should be directed to your office. However, we expect that many of these questions are best answered by Wolf Eagle, and we urge you to forward a copy of this letter to Wolf Eagle for its review and response.

1. Please explain why Wolf Eagle used data from a 24-hour sampling period to compare to a TCEQ long-term ESL? Long-term ESL's are based on an annual average, not a 24-hour sample. Comparing a 24-hour sample to a long-term ESL is "apples-to-oranges." Why did Wolf Eagle use this methodology in its report?
2. The term Tentatively Identified Compounds (TICs) was not adequately defined or described in the report. A reported TIC just means that the constituent or class of constituents could only be approximately matched with the lab instrument readings. Without further analysis, a specific compound and its concentration cannot be stated

accurately, yet it appears that Wolf Eagle treated these TICs as conclusive evidence of the existence and concentration of the air contaminant of concern. Did Wolf Eagle conduct such further analysis to identify the contaminant and its concentration?

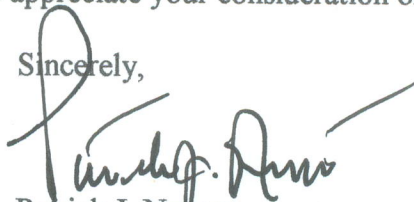
3. Please explain why monitors were not located in upwind locations to fully characterize the background concentrations of air contaminants in the ambient air before it blew across the site. Failure to do so means there is no way to determine whether the air contaminants originated from the operations at the compression stations or whether they were already present in the background concentrations before reaching the compression stations.
4. Why did Wolf Eagle imply that exceeding an ESL is the same as exceeding an emissions standard? ESLs are screening levels, not ambient air standards. Texas sets ESLs in a very conservative manner — with few exceptions they are well below the level that will cause human health effects. An ESL is a screening level below which no adverse effects are expected. Values above an ESL only indicate further review is warranted to determine if potential health effects could occur. Wolf Eagle's failure to make this clear (and Ms. Wilma Subra's mistaken reference to an ESL as a "standard" in her "evaluation" of the report) may have unnecessarily alarmed the public.
5. What is the explanation for the presence of certain chemicals that are not generally associated with gas production? For example, the Wolf Eagle report notes repeated instances of Freon (F-11 and F-12), a refrigerant; carbon disulfide, associated with the manufacture of viscose, rayon, and cellophane; naphthalene, used in mothballs; and various heavy hydrocarbons. Moreover, the TICs identified in the report are not unique to natural gas production or compressor stations; for example, dimethyl disulfide is one of the compounds responsible for the offensive odor of fecal matter and is found on farms with livestock (and is also produced naturally from certain vegetation). All of the other organic sulfides detected can be produced by naturally occurring sources as well. Did Wolf Eagle conduct any investigation or follow-up to determine whether sources other than compressor stations were responsible for the presence of these chemicals?
6. Of the seven air samples collected by Wolf Eagle, only one (Airport @ 1:29) showed an exceedance of a TCEQ short-term ESL (benzene at 78 ppb and m&p xylenes at 85 ppb). This raises concerns about data validity, because all of the other sample locations downwind of the compressor stations showed much lower benzene and m&p xylene concentrations (for example, the other sample location near the airport showed benzene at 1.0 ppb and m&p xylene at 0.83 ppb). Did Wolf Eagle look into this anomaly, and if so, what did Wolf Eagle conclude?

In conclusion, we note the following important statement in the Wolf Eagle report: "This study is not to be considered a comprehensive study, but rather a baseline assessment that allows for further monitoring of ambient conditions." Unfortunately, the report has been inaccurately portrayed by some as conclusive proof that the compression stations are harming plants, animals, and people. We trust that you share our belief that the results of any study, including the Wolf Eagle study, should not be mischaracterized. We also believe that it is important to ensure that

published reports concerning public health issues are accurate and are the product of thorough and responsible scientific analysis.

A prompt response to the above questions will help us as we assess the situation and consider any appropriate responsive measures. We appreciate your consideration of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick J. Nugent", with a long, sweeping horizontal line extending to the right.

Patrick J. Nugent
Executive Director