



Parks & Trails New York
Comments on the
Allegany State Park Gas Storage Lease
March 24, 2015

Please accept the following comments from Parks & Trails New York on the proposed Allegany State Park Gas Storage Lease with National Fuel Gas Supply Corporation (NFG).

With over 65,000 acres, Allegany State Park (the Park) is New York's largest state park. The Park offers a wealth of camping, hiking, swimming, skiing, wildlife viewing, and other outdoor recreational opportunities to 1.5 million visitors annually. The Park also contains the largest known extent of old growth forest in New York State outside of the Adirondacks and Catskills, contributing significantly to the region's biodiversity, and is home to significant habitats, rare, threatened and endangered species of plants and wildlife, wetlands, and natural communities.

We applaud the New York State Office of Parks, Recreation and Historic Preservation (OPRHP) for successfully negotiating gas storage lease terms which protect the Park and public access, and get a fair recompense to the State.

- We strongly support the prohibition of any expansion of the gas storage area, including a prohibition on:
 - the creation of new well locations or injection points;
 - the construction of new access roads;
 - the expansion of the width of existing access roads;
 - the cutting or clearing of vegetation;
 - any increase in the maximum pressure under which the gas is stored; and
 - the introduction of any additional pipelines or other infrastructure.

We also support the reduction in the underground footprint of the storage area by 1,608 acres. These terms will prevent any further disturbance to the Park while continuing to provide access to trails enjoyed by the public.

- We strongly support the shorter lease term of 15 years. This allows OPRHP and the public an opportunity to reevaluate the appropriateness of the lease and its terms in a much more reasonable amount of time than was allowed by the original 50-year lease.
- We are pleased to see an increase in the annual payments to OPRHP, as well as a free supply of natural gas to Allegany State Park for park use.

In conclusion, Parks & Trails New York believes OPRHP has achieved a balance between the energy needs of the neighboring community and the protection of the biological, natural, cultural and recreational resources that will ensure the park remains a viable resource for future generations.

Thank you for the opportunity to provide comments on the lease terms.