



40-60 Delaware Avenue
Sidney, New York 13838-1395
Telephone (607) 563-5979

John Wall
General Manager
Amphenol Aerospace

January 7, 2015

Stephen M. Tomasik
New York State Department of Environmental Conservation
Division of Environmental Permits
625 Broadway, 4th Floor
Albany, New York 12233-1750

RE: Constitution Pipeline – Water Quality Permits

Dear Mr. Tomasik:

On behalf of Amphenol Aerospace (“Amphenol”), a division of Amphenol Corporation, I submit the following comments concerning the application by Constitution Pipeline (“Constitution”) for various water quality permits from the New York State Department of Environmental Conservation (“DEC”).

Amphenol Aerospace is one of the largest manufacturers in the world of interconnect products for military, commercial and industrial applications. Amphenol’s Sidney, NY operations incorporate state-of-the-art manufacturing technologies including CNC machining, die-casting, molding, impact and extruding, plating, screw machining and process controls. Amphenol engineers utilize the latest in computer-assisted design software and analysis tools.

We have had a manufacturing facility in Sidney since the late 1920’s. At present, we employ over 1,000 local workers. Our manufacturing plant was flooded twice in the last ten years, the most recent event being Hurricane Irene in 2011. After Hurricane Irene, we seriously considered moving our business out of New York State, but we were persuaded by State and Delaware County officials to stay in Sidney at a new manufacturing location.

A major part of our decision to stay in Sidney was the promise from state officials that they would assist us in bringing natural gas service to our plant. Natural gas is particularly important for us as all our major competitors’ manufacturing facilities are serviced by natural gas. We suffer a 30-40% energy price disadvantage by not having access to natural gas. With the State’s moratorium on natural gas production, the only way we can receive natural gas is from the Constitution Pipeline and local distribution from the Leatherstocking Company, which has been designated by the Village of Sidney as the holder of its new natural gas distribution franchise. It is also important to note that a state agency, Empire State Development Corporation, has provided a \$750,000 grant to the Delaware County IDA to assist in defraying the costs of bringing the Leatherstocking gas line to our new facility.

We have reviewed the respective permit applications submitted by Constitution to the DEC. We believe that applicant has sufficiently demonstrated its commitment to ensure that construction of the pipeline has the least possible adverse impact upon the environment. Indeed, Constitution has worked closely with State and Federal regulatory agencies to ensure that pipeline construction is performed in a manner that is protective of the environment and water quality.

Constitution proposes to utilize trenchless crossing methods, employing horizontal directional drilling to cross several water bodies. Permanent wetland right of ways are maintained at 30 feet in order to reduce impacts upon wetlands. Mitigation measures for work near water bodies include the following: limited clearing of vegetation; perpendicular crossings of most water bodies; maintaining adequate water flow rates throughout construction, thereby preserving aquatic life; and, maintaining ancillary construction activities at least 100 feet from water bodies.

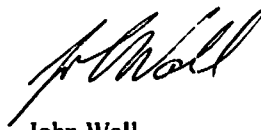
In addition, Constitution has mostly been able to limit the construction right-of-way width to 75 feet, while also ensuring that vegetation is cut just above ground level, leaving existing root systems in place. Numerous other environmental protection measures are contained within Constitution's construction plan to limit any permanent impact upon the environment. Moreover, Constitution plans six specific mitigation projects along the pipeline route, adding additional wetland and soil conservation measures which will more than compensate for any permanent losses due to pipeline construction.

It is clear that anytime a project of this magnitude is constructed that there will be environmental impacts which must be addressed. Amphenol is confident that the applicant has worked diligently so the project can be built and maintained with a minimum of disruption to the environment and that Constitution's plans with appropriate regulatory oversight will justify approval of the necessary DEC water permits.

Moreover, the urgent need to facilitate additional natural gas pipeline infrastructure has been well-documented throughout New York State and New England. While the metropolitan areas of the Northeast will receive the bulk of the natural gas delivered through the Constitution Pipeline, it is important for the DEC to remain sensitive to the needs of smaller communities along the pipeline route which will significantly benefit from access to natural gas. Delivery of natural gas is critical to Amphenol Corporation and its 1,000 employees in Sidney, as well as to the numerous other communities in this region of New York State which will benefit in the future by having access to natural gas.

The DEC should approve these permit applications without delay.

Sincerely,

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

John Wall
General Manager