STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Investigation pursuant to 30 V.S.A. §§ 30 and 209 regarding the alleged failure of Vermont Gas Systems, Inc. to comply with the certificate of public good in Docket 7970 by burying the pipeline at less than required depth in New Haven, Vermont	)	Case No. 17-3550-INV

VERMONT GAS SYSTEMS, INC.'S COMMENTS ON THE JOINT SUPPLEMENTAL REQUEST FILED JULY 13, 2017

Vermont Gas Systems, Inc. ("VGS") submits the Comments[1] below in response to the July 13, 2017 filing made by Kristin Lyons, Jane Palmer, Nathan Palmer, Lawrence Shelton and Rachel Smolker (hereafter referred to as the "Project Opponents")[2] asking the Public Utility Commission ("PUC" or "Commission") to expand the scope of this investigation to address additional depth of cover issues.

The Addison Natural Gas Pipeline ("ANGP" or "Project") is safe and has been installed in compliance with the requirements of the PUC's Order in Docket 7970. Contrary to Project Opponents' latest claims, VGS has fulfilled the PUC's depth of cover requirements in crossing streams and in residential areas, as demonstrated by the evidence discussed below. Very importantly, with the exception of 18 spots in the Clay Plains Swamp which VGS maintains are a non-substantial change as described in its recent filing, VGS has complied with the depth of cover requirements for the full 41 miles of the ANGP. VGS therefore urges the PUC to reject the Project Opponents' request to broaden the scope of this investigation.

I. The CPG Depth of Cover Requirements

Vermont has adopted federal pipeline safety standards, enforced through the Department of Public Service ("DPS" or the "Department"). *Petition of Vermont Gas Systems, Inc., for a certificate of public, pursuant to 30 V.S.A. § 248, authorizing the construction of the "Addison Natural Gas Pipeline,"* Docket 7970 (Vt. Pub. Util. Comm., Dec. 23, 2013) Final Order

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[1] In its July 24 Order, the PUC requested comments by August 4 on the July 13 submission. In its July 17 Order, the PUC requested VGS provide, *inter alia*, evidence to certify depth of cover for the full 41 miles of the Project; VGS will provide that information in a separate filing on or before August 11, as directed by the PUC.

[2] VGS responds to the comments submitted on July 13, 2017 by Project Opponents per the PUC's Order, but in doing so, VGS does not waive any arguments regarding the requested intervention of the Project Opponents not admitted in Docket 7970.

(hereafter "Final Order") at 87, Finding 261. In its Final Order approving a Certificate of Public Good ("CPG") for the ANGP, the Commission found that:

> 259. The Project has been designed and will be constructed and operated to meet or exceed all applicable state and federal codes and standards, including Part 192 of Title 49 of the Code of Federal Regulations (the safety standards of the Office of Pipeline Safety at the U.S. Department of Transportation), the B31.8 Code of the American Society of Mechanical Engineers (governing the design of gas transmission and distribution piping systems), and PSB Rule 6.100 (pipeline safety). Teixeira pf. at 12-13.

Final Order at 87, Finding 259. Part 192 of Title 49 of the Code of Federal Regulation sets 36 inches as the maximum depth of pipeline soil cover.[3] This is the depth, therefore, that the Commission's CPG requires in the absence of other express standards. The Commission also found that, on the Department's recommendation, VGS agreed to build the pipeline to meet federal "Class 3" standards, even though all but 6 miles of the 41-mile pipeline route is categorized as Class 1 or 2, which otherwise would require less stringent standards.[4] Final Order at 35, Finding 24-26. The ANGP was in fact built to this standard.[5]

In describing the Project, the Commission made this finding expressly related to depth of cover of the ANGP:

> e. Pipe lengths will be welded together, inspected, laid in the trench and warning tape will be laid over the line, and then the trench will be backfilled. *The pipe will be covered by at least 36 inches of soil. The pipeline will have four feet of cover in agricultural areas and within the VELCO ROW, generally five feet of cover at road crossings, and seven feet of cover at open cut streams.*

Final Order at 40, Finding 62(e) (emphasis added). The only other references to depth of cover in the Final Order appear in the findings regarding the Section 248 Public Health and Safety

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3 See 49 C.F.R. § 192.327. There are specific sites and conditions that permit a shallower depth of cover than the 36-inch maximum.

4 Per 49 C.F.R. Part 192, natural gas pipelines are given a class location from 1 to 4 to designate population density along the pipeline. Final Order at 35, Finding 24. Class 1 is the lowest population density and Class 4 applies to the most populated areas. *Id.* Most of the pipeline, approximately 37 miles, would be Class 1 or Class 2, and none is at Class 4. *Id.*, Finding 25. Class 3 standards would otherwise only apply in the most densely populated areas along the pipeline, or for less than 6 miles. *Id.* Class 3 requires, among other things, heavier gauge pipe and a depth of cover of 36 inches, except where specific conditions allowing for a shallower depth exist. *Id.*, Finding 24.

5 The ANGP pipeline employed all Class 3 requirements and was installed at least 36 inches underground at every one of the more than 4500 individual welds along its entire 41-mile length. Furthermore, more than 95% of the pipeline was installed at a depth of at least 4 feet. See Affidavit of John St. Hilaire, ¶ 11, ("St. Hilaire Aff."), provided here as Attachment 1.

criterion:

> 267. Vermont Gas will employ at least 36 inches of cover or equivalent means to protect the pipeline from outside force damage. In areas where deep tilling or other activities could threaten the pipeline, the top of the pipeline must be installed at least one foot below the deepest expected penetration of the soil. Berger reb. pf. at 7.
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> 268. In agricultural areas, Vermont Gas will install the pipe with a minimum of 4 feet of cover. Berger reb. pf. at 7.

Final Order at 89, Findings 267-268. Based upon these findings, the Commission concluded that the pipeline met the standard for public safety and health:

> The evidence in this proceeding persuasively demonstrates that public health and safety will not be adversely affected by the design, construction and operation of the Project. *Vermont Gas has designed and will construct and operate the Project in a manner which meets or exceeds all applicable state and federal codes and standards.*

Final Order at 92 (emphasis added).

Nothing in the Final Order approving the CPG sets a different depth of cover requirement for "residential areas," and that term is nowhere defined in the Final Order.[6]

With respect to water crossings, the Final Order contains extensive, specific findings that illuminate what its general statement in Finding 62(e) means. The Commission emphasized that the ANGP pipeline "will cross 17 unique streams or rivers at 22 discrete locations that have been mapped by the ANR/DEC with watershed sizes greater than one (1) square mile which are subject to review and comment by DEC personnel." Final Order at 108, Finding 368.[7] The PUC distinguished crossings of these 17 streams from other water crossings, noting that, "[t]he Project will also cross several brooks, streams, and riparian buffer zones." *Id.* at 108, Finding 371.

The Final Order adopted the position of the Agency of Natural Resources ("ANR" or "Agency") that required VGS to obtain all necessary permits from the Agency and its Department of Environmental Conservation as a condition precedent to the CPG:

> Our approval of this Project is conditioned upon VGS obtaining a stream alteration permit prior to construction of the Project. *With this condition, we find*

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[6] As further described below, specific landowner concerns along the pipeline were addressed in the CPG proceeding through individual agreements, rerouting, and use of Horizontal Directional Drilling (HDD) in several locations, in addition to the adoption of Class 3 standards.

[7] Alterations in the pipeline route eliminated the need for one jurisdictional stream crossing in the originally planned 22 crossings. Nelson pf. reb. at 7 (06/28/13).

that the Project will maintain the natural condition of involved streams and will not endanger the health, safety, or welfare of the public or adjoining landowners.

Final Order, Discussion at 111; see also Final Order at 146 Order, ¶ 3.VGS obtained the required permits. As detailed below, VGS complied with the conditions of the Stream Alteration Permit required by the CPG by burying all crossings at the 17 streams to at least 7 feet deep.[8]

II. This Proceeding Should Not Be Broadened To Include Project Opponents' Claims.

Vermont Gas received a Section 248 CPG for the ANGP in December 2013. The PUC undertook an intensive review of this project before issuing the CPG. In addition to VGS, the DPS and Vermont ANR, numerous parties intervened, in many cases offering testimony, exhibits, proposed findings and conclusions. The PUC conducted two public hearings and heard from hundreds of non-parties, orally or in writing. The record in the CPG proceeding comprises thousands of pages.

The Project took more than two and half years to complete: VGS contractors undertook construction of the pipeline in the construction years 2014, 2015, 2016 and the early months of 2017. The pipeline became operational on April 12, 2017. VGS is completing post-construction documentation and review. It filed, as a part of that, a sixth non-substantial change request in early June 2017 related to 18 specific locations in the Clay Plains Swamp that are shallower than 4 feet, the depth of cover standard within the VELCO right of way.

VGS built the ANGP in compliance with the CPG's depth of cover requirements, apart from these 18 locations which it believes are non-substantial changes.[9] Project Opponents have now alleged that the pipeline was subject to CPG stream crossings and "residential areas" depth of cover requirements that do not in fact exist, in an apparent attempt to cast new doubt upon the Project and VGS' construction techniques.

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[8] As described further below, VGS used a construction practice burying all other water crossings not covered by the CPG or DEC permits to a depth of 5 feet or greater. This commitment exceeded the maximum 36 inches otherwise required by state adoption of federal safety standards as applied to this Project. Also, the Stream Alteration Permit set forth requirements regarding HDD crossings at some stream locations and protections for Fluvial Erosion Hazard ("FEH") zones, all of which VGS met. Affidavit of Jeffrey A. Nelson, ¶¶ 6, 9-10, ("Nelson Aff."), provided here as Attachment 2.

[9] In accordance with the PUC's order in this matter, VGS will file its evidence and certifications confirming depth of cover compliance on August 11, 2017.

The erroneous depth of cover argument made by the Project Opponents seems to be premised not on specific CPG conditions but instead upon testimony of VGS witness John Heintz, an engineer employed by Clough Harbor Associates. In providing a general description of the steps involved in pipeline construction, Heintz stated that, "[t]he pipe will be covered by at least 36 inches of soil. [It] will have four-feet of cover in agricultural areas, within the VELCO ROW and residential areas, and *generally* five-feet of cover at road crossings and seven feet of cover at open cut streams." Heintz pf. supp. at 32 (12/20/12) (emphasis added).

Based on this single sentence from Heintz's testimony, Project Opponents assert that *all* trenched stream crossings, no matter their size or flow, are required to have at least seven feet of cover between the top of the pipe and the stream bed. That is not and was not VGS' understanding of the stream crossing depth of cover requirement. The Project Opponents' contention is not supported by the parties' extensive testimony addressing the stream crossing issue and, moreover, is inconsistent with the PUC Order that incorporates DEC permit requirements on depth of cover that apply only to larger stream crossings. The Project Opponents also cite the Heintz testimony to assert the existence of a 4-foot residential cover CPG standard. In its Final Order approving the CPG, the Commission, in its Description of the Project, quoted this Heinz testimony, except it deleted the reference to residential areas. *Compare* Final Order at 40, ¶ 62(e), quoted above. The Project Opponents' claims are not supported by a fair reading of the Commission's Final Order or the full record. The Commission should reject the request to broaden this proceeding.

A. The Project Meets All CPG and DEC Permit Requirements For Depth of Cover at Stream Crossings.

VGS buried the ANGP pipeline at stream crossings in full compliance with the CPG. The Final Order requires a depth of 7 feet or more for the 17 identified streams as required by the Stream Alteration Permit. Although the 3-foot depth of cover CPG standard would apply to all other stream crossings, in fact VGS exceeded this standard by burying the pipe 5 feet below the bed for all these crossings (with the exception of two where the crossing was designed to go over the existing stream culvert). See St. Hilaire Aff., ¶¶ 9-10, attaching table showing depth of cover for every underground stream crossing in the Project.

i. The CPG requirement of 7 feet is limited to 17 identified streams, which are all the streams in the Project that are subject to DEC jurisdiction.

The Final Order relies on testimony from Jeffrey Nelson, an engineer, hydrologist, and hydrogeologist. Final Order at 108, Finding 368. Nelson's prefiled testimony indicates that the stream crossings that VGS proposed to address with at least 7-foot depth of cover, either through horizontal directional drilling ("HDD") or trenching, were 17 streams crossed by the pipeline that both flowed perennially and had a watershed of one square mile or more. Nelson pf. supp. at 23 (02/28/13). These are the only streams within ANR and DEC stream alteration jurisdiction. Nelson pf. supp. at 22-23 (02/28/13).

VGS and Jeff Nelson worked closely with DEC during 2012 and 2013 prior to the PUC's Final Order to ensure that the 21 crossings of these 17 streams[10] would be constructed in a manner that protected the stream bed, the pipeline and the public safety from the risks posed by erosion. Nelson pf. reb. at 8 (June 28, 2013). VGS proposed, and DEC approved, that 84 inches, or 7 feet, would accomplish this at those crossings. Nelson Aff., ¶¶ 12, 21. In addition, the PUC approved a related protection required by DEC. This provision requires that the pipeline be buried to the depth of the stream bed across the entire delineated fluvial erosion hazard zones ("FEH")[11] adjacent to these streams. Final Order at 109, Finding 377. Both the 7-foot depth and FEH requirements were formulated to further ameliorate the risk of erosion caused by pipeline exposure in these larger water crossings. Nelson pf. supp. at 24; Exh. Pet. JAN-7 (2/28/13).

Consistent with witness testimony and DEC requirements, the PUC's Final Order noted that the ANGP pipeline "will cross 17 unique streams or rivers" as mapped by DEC and subject to its review and comment. Final Order at 108, Finding 368. The PUC distinguished crossings of these 17 streams from other water crossings, noting that, "[t]he Project will also cross several brooks, streams, and riparian buffer zones." *Id.* at 108, Finding 371. The PUC stated that "[s]ite specific characterizations of all proposed stream crossings locations, the proposed methodology of crossing (HDD vs. open trench), and all stream crossing protocols have been reviewed with DEC personnel." *Id.* at 109, Finding 376; Nelson pf. supp. at 24 (02/28/13); exh. Pet. Supp. JAN-7 (02/28/13). The PUC conditioned the CPG for the Project on VGS obtaining a Stream

[10] The pipeline crosses some of these streams more than once (e.g., Alder Brook and Indian Brook). Exh. Pet. Supp. Jan-7 (6/28/13).

[11] FEH refers to the erosion of the sides of the stream banks and the potential for sideway movement of the stream.

Alteration Permit, as requested by ANR. Final Order at 111. It concluded that with VGS' satisfaction of that condition, the Project will "maintain the natural condition of involved streams and will not endanger the health, safety, or welfare of the public or adjoining landowners." *Id.*

The Commission noted in its description of the Project that "[t]he pipe will be covered by at least 36 inches of soil. The pipeline will have four feet of cover in agricultural areas and within the VELCO ROW, generally five feet of cover at road crossings, and seven feet of cover at open cut streams." Final Order at 40, Finding 62(e) (citing Heintz pf. supp. 31-32 (12/20/12). But this general statement cannot, as the Project Opponents now seem to claim, take precedence over the specific findings of the Final Order and the DEC permit itself by requiring that each water crossing along the entire pipeline be at a depth of 7 feet or greater. That result, 3 years after the initial Stream Alteration Permit issued, would vitiate the specific, express decision by the PUC to condition the CPG on that permit – a permit which VGS was required to pursue prior to construction.

Instead, the PUC's Final Order makes clear that it required a 7-foot depth of cover beneath the beds of the 17 streams subject to DEC jurisdiction within the ANGP pipeline, and not at every single water crossing within the 41-mile project as the Project Opponents now allege. This is consistent with the information in the record that the 7-foot minimum depth of cover was intended to apply to streams subject to DEC's permit. Nelson Aff., ¶ 21. This is how VGS constructed the pipeline, and it complied with the CPG in doing so. The Project Opponents' claims to the contrary should be rejected.

ii. VGS has complied with the CPG's stream-crossing standard.

In accordance with the CPG, VGS obtained the required Stream Alteration Permit from DEC in 2014 and an amended permit in 2016. Nelson Aff., ¶¶ 6, 22. In the Stream Depth Table, attached to Mr. St. Hilaire's Affidavit, VGS demonstrates that all streams listed in that permit have been buried to a depth of 7 feet below the stream bed, as required by the PUC's Final Order. St. Hilaire Aff., ¶ 9; St. Hilaire Aff., Attachment A ("Stream Depth Table").

For all other water crossings, for which the general 3-foot depth of cover was required, VGS exceeded the CPG and permit requirements by utilizing a depth of at least 5 feet, with the exception of the two crossings that were designed to be buried under the road but over existing culverts at Alder Brook. St. Hilaire Aff., ¶ 10; Nelson Aff. ¶ 11. This is consistent with the evidence presented in the record in Docket 7970. The 5-foot depth of cover for the non-

jurisdictional or smaller streams "is appropriate and protective, given the limited potential for stream channel downcutting or lateral migration associated with these features." Nelson Aff., ¶ 24.

iii. The Project Opponents' Claims Regarding Plans Sets Also Do Not Alter The PUC's Final Order.

The Project Opponents try to bolster their claim that the CPG requires a 7-foot depth at every water crossing, rather than as required by the DEC permit, by pointing to certain plans submitted with Jeffrey Nelson's testimony. These plans depict a typical open trench stream crossing construction standard, labeled on the plans as "construction type 7" and noted at a depth of 84 inches. These plans do not actually indicate that the pipe will be buried to at least 7 feet under every water crossing where open trench construction is used. See Supp. Jan-9, Attachment 1. The plan set does, however, incorrectly depict "construction type 7" for some smaller stream crossings that did not require a 7-foot depth under the DEC permit. Nelson Aff., ¶ 17. This error does not create an obligation to utilize the 7-foot depth at all water crossings. There is nothing in the Final Order or DEC permit about "construction type 7" or the specific use of it on each alignment sheet.

In its Final Order, the PUC was appropriately focused on its duty to assess the Project's impact on streams as a natural resource. In doing so, the Commission determined that with the condition of VGS obtaining a Stream Alteration Permit before construction from DEC as the Agency had requested, the Project would maintain the natural condition of involved streams and would not endanger the health, safety, or welfare of the public or adjoining land owners. Final Order at 111. VGS understood that it would be required to utilize a 7-foot depth of cover where required by that permit. VGS has fully complied with the Commission's CPG and its underlying DEC permit for stream crossings. The Project Opponents' belated attempt to question the adequacy of depth of cover for all stream crossings should be rejected.

B. VGS Has Met Its Commitments Regarding Installation Of The ANGP In Residential Areas.

i. The PUC's Final Order Does Not Contain A Residential Area Depth of Cover Standard.

There is no requirement in the Final Order regarding depth of cover in "residential areas," or definition for "residential areas." The term is not found in the Final Order at all.

A review of the record itself also makes clear that the subject of depth of cover in "residential areas" was not substantively addressed in the CPG proceedings. The term is mentioned in VGS witness John Heintz's testimony discussed previously and submitted on December 20, 2012 and repeated on February 28, 2013, where he includes a reference to the pipeline "generally" having 4-foot depth of cover for "residential areas" within his summary description of the construction process. See *supra* fn. 11; Heintz pf. at 31-32 (12/20/12). In the Final Order itself, within the Description of the Project, the Commission quoted Heinz's testimony, except it deleted any reference to "residential areas." Final Order at 40, Finding 62(e).

ii. VGS And Stakeholder Agreements In 2013 Realigned The Pipeline To Locate It In Road Right of Ways and Utility Corridors As Much As Possible.

The absence of a separate depth of cover requirement for "residential areas" in the PUC's Final Order is not an oversight, but rather is consistent with the successful efforts of VGS and many interested parties in early 2013 to address other specific concerns regarding routing through realignment of the ANGP so that it would be buried, to the greatest extent possible, in existing utility corridors and road right-of-ways, rather than in certain town centers and other residential neighborhoods.

The PUC's Final Order recognizes this:

> The original Project design, submitted on December 20, 2012, was subsequently revised in submissions filed by VGS on February 28, 2013 (the "2/28/13 Alignment") and again on June 28, 2013 (the "06/28/13 Alignment"), to include both a number of re-routes and shifts in the corridor alignment, as well as construction design changes to reduce land owner, environmental and cultural resource impacts.

Final Order, p 33, Finding 11. Based on feedback from the various stakeholders, in early 2013, Vermont Gas realigned "sections of the pipeline in Monkton, Hinesburg, and New Haven within the VELCO corridor, to the extent possible." Wark pf. supp. at 2, 5; Final Order at 35, Finding 22. The June 2013 alignment was done to incorporate more changes based on discussions and agreements with land owners, towns, Chittenden Solid Waste District, and the Agency of Natural Resources. Heintz supp pf. 06/28/13 at 2.

iii. The Pipeline Is Buried At All Locations Along The 41 Miles At A Depth Greater Than The Required Standard And To A Depth Of At Least 4 Feet Over 95% Of Its Length.

Even if the Project Opponents' belated claim about a "residential area" depth standard had merit, the fact is that the ANGP would meet it. The Project is built at or deeper than 4 feet over 95% of its 41-mile length, including anywhere that could reasonably be deemed a "residential area." None of the limited areas where the pipeline is buried between 3 and 4 feet are in an area that would otherwise fairly be characterized as a residential area, even if the term had been defined in this proceeding. St. Hilaire Aff., ¶ 12. The Commission should therefore decline to broad this investigation to include any further inquiry into the Project Opponents' residential depth of cover claim.

C. VGS Also Employed Other Measures Besides Depth of Cover To Ensure Safety.

When considering after-the-fact allegations in this complex, lengthy proceeding with a voluminous record, it can be easy to lose sight of a central, important fact: the ANGP is safe and was built to standards to ensure its continued safety. For example, as noted previously, VGS built the entire 41-mile pipeline to federal Class 3 standards under 49 C.F.R. Part 192. By agreeing to build the entire pipeline to federal Class 3 standards, as the Department recommended, VGS has installed a stronger, heavier gauge pipe and agreed to more rigorous testing and monitoring standards than otherwise would be required by the federal safety standards. St. Hilaire Aff., ¶ 3. VGS also ensured that every one of the approximately 4,500 welds where individual lengths of pipeline were joined together was tested by x-ray, rather than relying on sampling as is routinely done in the industry. St. Hilaire Aff., ¶ 4. As well, VGS applied anti-corrosive coating and cathodic current to protect the entire pipeline from corrosion.[12] St. Hilaire Aff., ¶ 5. All these measures, along with other steps such as rerouting already discussed above, were taken to enhance the safety of the pipeline and meet the concerns of interested parties. As the

[12] Other safety protocols followed by VGS include installing 12" yellow ribbon above the pipeline to warn excavators of the presence of the natural gas transmission line, above ground pipeline markers to indicate the pipeline location, and conducting a quarterly patrolling program that requires above ground visual inspections of the pipeline for construction activity, "washouts," and other conditions that could affect pipeline safety. In addition, VGS has public information programs in place designed to alert municipalities, schools, residents and excavation operators of the pipeline locations and how to report hazards. VGS also has a "one-call" (also known as "dig safe") program in place to ensure that before excavation near the pipeline is performed the pipeline location is identified and marked and that the excavation is safely performed in a manner that will not damage the pipeline. St. Hilaire Aff., ¶¶ 6-7.

Department agreed in its comments recently filed in response to VGS' non-substantial change request in this proceeding, this pipeline is safe.

III. Conclusion

Three conclusions regarding depth of cover can be drawn from a review of the PUC's Final Order and the record on the issues of streams and residential areas depth of cover:

1. Vermont Gas agreed, and the Order required, that VGS construct the pipeline to federal safety standards, including that the pipeline be at least 36 inches deep – 3 feet – except where specifically otherwise provided.

2. There are no specific CPG depth of cover requirements for streams, except as they are required by the Stream Alteration Permit included in the CPG as a condition precedent. That permit required a 7-foot depth at listed stream crossings, not every one. That is what VGS understood, and what it did. No requirement exists to build to 7-foot depths at every location where the pipeline crosses water. Nevertheless, VGS did in fact employ a 5-foot depth of cover for all other buried stream crossings rather than the CPG's general 36-inch depth standard.

3. There are no specific CPG depth of cover requirements for "residential areas," or any discussion, definition or reference to such areas in the Commission's Final Order. Instead, the CPG's general 36-inch standard applies, along with other adopted measures to reroute the line and employ other protective construction techniques. Nevertheless, VGS did in fact build the pipeline along nearly all of its 41-mile length to at least 4 feet, including any area that reasonably could be considered a "residential area."

As shown by the evidence submitted, the Project Opponents' request to expand this investigation to include stream crossings and residential depth of cover issues should be denied. VGS built the Project to meet the required depths of cover for streams and in residential areas.

Dated at Burlington, Vermont this 4th day of August 2017.

VERMONT GAS SYSTEMS, INC.

By: _____

SHEEHEY FURLONG & BEHM P.C.
Debra L. Bouffard, Esq.
30 Main Street
P.O. Box 66
Burlington, VT 05402
(802) 864-9891
dbouffard@sheeheyvt.com