



April 14, 2025

LD-1507, “An Act to Require General Public Notification of Oil Terminal Facility Transfer Activities”

Good afternoon, Senator Tepler, Representative Doudera and esteemed members of the Joint Standing Committee on Environment and Natural Resources. My name is Tim Winters, I reside in Dover, New Hampshire and I am the Vice President of Operations for Sprague Operating Resources, representing our marine terminals in South Portland, Portland, and Searsport Maine. Sprague has been around since 1870 and has had ports in Maine since 1905.

Through our Searsport terminal at Mack Point, we have been the leader in onshore wind-component handling for over 20 years throughout New England. Sprague received the International Sustainability Impact Award in 2020 for our first-in-the-nation thin film solar panels on a liquid fuel tank at our South Portland facility. From whale oil to solar, we have a 155-year history of evolving to meet the needs of our customers throughout Maine and the greater Northeast. Sprague has been a proud member of the Maine community for more than a century, providing a multitude of products and services, including asphalt for the roads we all drive on, road salt to keep those roads safe, and energy the citizens rely on to stay warm.

I am here today to express significant concerns and strong opposition to the proposed legislation, LD 1507. While we understand the desire for public awareness regarding activities within the community, this bill, as currently drafted, poses substantial risks to security, commercial viability, market stability, and ultimately imposes undue burdens that will negatively impact consumers.

The requirement for oil terminal facilities to develop, implement, and publicly post community notification plans detailing oil transfers within a 24-hour window raises several critical issues:

1. **Security Sensitivity of Operational Timelines:** Mandating the near real-time public notification of oil transfers, particularly those involving vessels, creates serious security vulnerabilities. Public disclosure of vessel arrival and transfer schedules provides precise timing information about significant operations at critical infrastructure sites. This information could potentially be exploited by malicious actors, jeopardizing the safety of facility personnel, transport crews, the facility itself, and our neighbors. Protecting the specific timing of these operations is a fundamental aspect of maintaining operational security.
2. **Compromise of Commercially Sensitive Information:** The notification requirement, even if only detailing the *timing* of a transfer, inherently reveals sensitive commercial data. Publicly reporting the frequency and timing of product receipts allows competitors to deduce inventory levels, supply chain logistics, customer relationships, and internal marketing strategies. This disclosure poses a considerable commercial risk, undermining competitive positioning built through careful planning and investment. Furthermore, such reporting could inadvertently lead to breaches of existing contractual confidentiality agreements with suppliers and customers who rely on discretion.