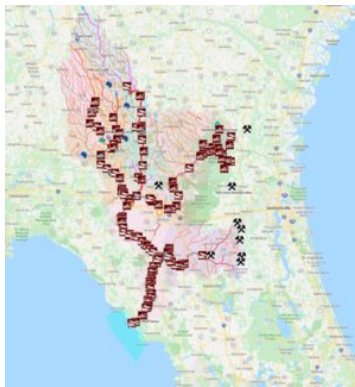


April 13, 2020

To: Nathaniel J. Davis, Sr., Deputy Secretary.  
Federal Energy Regulatory Commission (FERC)  
Via e-filing

Re: **Motion to Halt Phase II and Invoke penalties by WWALS, in proceeding on Request for Extension by Sabal Trail Transmission, LLC, Docket No. CP15-17**

Dear Secretary Davis and FERC Commissioners,



This is a **Motion to Halt Sabal Trail Phase II and to Invoke Penalties**, by Suwannee Riverkeeper on behalf of WWALS Watershed Coalition, Inc. (WWALS). WWALS is an Intervenor both in the underlying process of Docket No. CP15-17 and in the comment period (see FERC Accession Number [20200327-3095](#)) on the March 26, 2020, request (Accession Number [20200326-5147](#)) by Sabal Trail Transmission, LLC (Sabal Trail) for an extension of time to construct and place into service its Phase II project facilities for its Sabal Trail Project authorized on February 2, 2016.

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WWALS is an IRS 501(c)(3)  
nonprofit charity est. June 2012

*WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.*



1. According to Sabal Trail's own progress reports (see Accession Number [20200325-5216](#)) to FERC before its extension request, even before the novel Coronavirus, Sabal Trail was not on schedule for the Dunnellon Compressor Station, and would not finish in time, after already being more than a year late for the original deadline of February 2018.
2. Suddenly, after asking for an extension of many months, and before the end of the comment period on that extension established by FERC, Sabal Trail submitted an early monthly status report (Accession Number [20200407-5117](#)) claiming to be mostly finished with the Albany and Dunnellon Compressor Stations, followed by a request the next day to "Place into Service Phase II Project Facilities" (Accession Number [20200408-5059](#)). Either Sabal Trail could not finish for many months, or it is already finished. Which is it? Sabal Trail's latest monthly report is not sufficient evidence.
3. Given the numerous leaks Sabal Trail has already incurred (see for example those enumerated in the WWALS Motion to Intervene, Accession Number [20200406-5070](#)), FERC at a minimum should require independent third-party inspection of Sabal Trail's work before accepting it. And during a pandemic quarantine period is no time for such an inspection.
4. In that latest monthly report "Sabal Trail affirms that it will continue to use its diligent efforts and employ the necessary crews and personnel to complete the rehabilitation and restoration work as soon as reasonably practicable." Neither Marion County, Florida, nor Dougherty County, Georgia, need Sabal Trail crews going in and out during the virus pandemic quarantine period.
5. Meanwhile, oil and gas prices have crashed, removing the market that was the only alleged justification for Phase II. Rather than risk the local population of Marion County further from Sabal Trail leaks and accidents, FERC should halt Phase II and invoke whatever penalties are in the permit.
6. Further, some of the gas pumped through Sabal Trail is destined for Liquid Natural Gas (LNG) export facilities in Florida; facilities which have authorization from the Department of Energy Office of Fossil Energy (FE) to send that LNG on trucks or rail cars to many ports in Florida, risking other road traffic as well as

hospitals, schools, businesses, and homes along the way, as well as waterways and wells. WWALS has members near some of those existing or proposed LNG facilities, in Martin, Dade, and Citrus Counties, Florida. Several of those LNG export facilities have FE authorization to ship LNG to Free Trade Agreement and Non-Free-Trade-Agreement countries. WWALS objects to any gas through Sabal Trail being used for such private profit through export, which make a mockery of Sabal Trail's use of FERC-supplied federal eminent domain to take easements through private and public property for this pipeline. WWALS further objects to increasing the capacity of Sabal Trail through its Phase II construction so as to increase such LNG traffic through Florida or LNG export abroad.

For the reasons stated above, WWALS moves for FERC to halt Sabal Trail Phase II and to invoke penalties for lack of completion of the project.

Thank you for your consideration.

For the rivers and the aquifer,

John S. Quarterman

/s

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