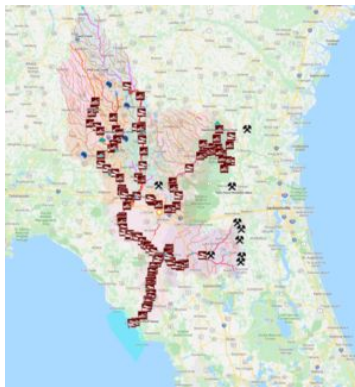


April 6, 2020

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

Re: **Motion to Intervene by WWALS Watershed Coalition, Inc., in proceeding on Request for Extension by Sabal Trail Transmission, LLC, Docket No. CP15-17**

Dear Secretary Davis and FERC Commissioners,



Pursuant to the Commission's Rules of Practice and Procedure (18 CFR §385.214 and 18 CFR §157.10) and the Regulations under the Natural Gas Act (18 CFR 157.10), WWALS Watershed Coalition, Inc. (WWALS) as Intervenor hereby moves to intervene as a party to this proceeding, namely the intervention and comment period (see FERC Accession Number [20200327-3095](#)) on the March 26, 2020, request 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. In support hereof, Intervenor shows as follows:

1. Contact Information and Service of Filings

Intervenor requests that the Commission include the following representatives on the official service list to receive service of all filings and communications made in this proceeding:

John S. Quarterman, Suwannee Riverkeeper, WWALS Watershed Coalition, Inc., wwalswatershed@gmail.com

2. WWALS is an intervenor party to the underlying proceeding

in Docket No. CP15-17 (see FERC [Accession Number 20141222-5054](#)), as required in FERC's March 27, 2020, "Notice of Extension of Time Request re Sabal Trail Transmission, LLC under CP15-17" (see FERC Accession Number [20200327-3095](#)).

3. Basis for Intervening:

- a. WWALS Watershed Coalition, Inc. (WWALS), established 2012, is a nonprofit environmental advocacy organization, with active members and supporters in Georgia and Florida. WWALS remains deeply concerned about the destructive activities of Sabal Trail as they affect rivers and the Floridan Aquifer in south Georgia and north Florida, consonant with the WWALS Mission, which is that WWALS 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.
- b. All the gas delivered by Sabal Trail to its Dunnellon Compressor Station site passes under the Withlacoochee, Suwannee, and Santa Fe Rivers in the Suwannee River Basin. Years ago WWALS discovered drilling fluid leaking up from Sabal Trail's pilot hole below the Withlacoochee River in Georgia (see Accession Numbers [20161024-5049](#), [20161109-5153](#), and [20161128-5230](#)), despite the assurances of Sabal Trail that that would never happen in the similar geography of the Suwannee River. Such leaks

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WWALS is an IRS 501(c)(3)
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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.



- risk the Floridan Aquifer, which is the source of almost all water for drinking, agriculture, and industry in the Suwannee River Basin.
- c. Sabal Trail's Hildreth Compressor Station in Suwannee County, Florida, in the Suwannee River Basin, leaked methane in September 2018, and Sabal Trail only reported that leak to the state of Florida a week later (see Accession Number [20181219-5184](#)).
 - d. WWALS has longstanding members in the Withlacoochee (South) River watershed, in which Sabal Trail is constructing its Dunnellon Compressor Station as part of its Phase II. Well before that construction started, WWALS and its members discovered and reported repeated leaks of toxic odorant chemicals from that same site in which Sabal Trail "wrapped the area with towels and sprayed a deodorant but more than likely will continue to leak until line is fixed." (see Accession Numbers [20170727-5104](#), [20170811-5152](#), and [20181219-5184](#)). Some Sabal Trail gas goes through Sabal Trail's Citrus County Pipeline under the Withlacoochee (South) River, and this Phase II construction of the Dunnellon Compressor Station would only increase the risk to that river.
 - e. WWALS also has longstanding members in the Flint River Basin near Albany, Georgia, where Sabal Trail is constructing its Albany Compressor Station, despite five reported sinkholes near that Flint River, apparently caused by the construction of the Sabal Trail pipeline (see Sabal Trail's biweekly status reports starting with its thirteenth report in Accession Number [20161202-5137](#), and see especially [Accession Number: 20170505-5043](#), which lists sinkholes in numerous locations near our rivers). All of Sabal Trail's gas between its Albany, GA, and Dunnellon, FL, Compressor Station sites goes under the Flint River.
 - f. WWALS remains concerned about the risks Sabal Trail poses to the Flint, Withlacoochee, Suwannee, Santa Fe, and Withlacoochee (South) Rivers, and to the Floridan Aquifer. Construction of these Phase II Compressor Stations would only increase the risks to all these rivers and to the Aquifer.
 - g. 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.
 - h. Meanwhile, oil and gas prices have crashed, removing the market that was

the only alleged justification for Phase II.

- i. According to Sabal Trail's own progress reports to FERC, even before the novel Coronavirus, Sabal Trail was not on schedule for the Dunnellon Compressor Station, and would not finish by the FERC-extended deadline of May 1, 2020, much less the original deadline of February 2, 2018 (see Sabal Trail's monthly status reports covering January and February 2020, in Accession Numbers [20200218-5103](#) and [20200325-5216](#)).
- j. 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.
- k. WWALS will expand on its objections to the proposed extension in a further comment later.

4. Motion to Intervene.

For the reasons given above, WWALS has a substantial interest in this proceeding that cannot be adequately represented by any other party and may be directly affected by FERC decisions herein. WWALS is an interested party within the meaning of 18 CFR §385.214 and 18 CFR §157.10, and its participation in this proceeding is in the public interest.

WHEREFORE, for the above reasons, Intervenor requests that the Commission GRANT its Motion to Intervene.

Done this 6th day of April, 2020.

For the rivers and the aquifer,

John S. Quarterman

/s

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