available in Albany were filled with COVID-19 patients"); Alan Judd, *Mobile morgues suggest Georgia's coronavirus crisis is far from over*, Atlanta Journal-Constitution, April 9, 2020²¹ ("Critical care units at [Albany's] hospital have been pushed to their limits.").

FERC Should Require Sabal Trail to Halt Construction and Should Deny its Request to Place Phase II Facilities into Service

As a result of this outbreak, Albany has been "mostly locked down for several weeks." See also More restrictions in place for Dougherty County shelter-in-place order, WFXL Fox 31 News, March 22, 2020. In light of these unprecedented circumstances, Sabal Trail should halt construction work on this non-essential facility. Only workers that are needed for health and safety purposes, if any, should remain at the site.

FERC also should deny Sabal Trail's request to begin operating the Albany and Dunnellon compressor stations. In addition to the increased air pollution burden, other pertinent risks include "an unanticipated ... compressor station failure, gas leaks, and blowdowns at compressor stations." Atlantic Coast Pipeline Final EIS at 4-14. As local residents face an unprecedented public health emergency, they should not be forced to bear additional health and safety risks that could exacerbate respiratory illness and further tax first responders and local healthcare facilities.

Moreover, any claim that there is some urgency to placing the compressor stations into service is belied by the fact that Sabal Trail is already more than two years behind schedule, ²⁵ and that Sabal Trail recently requested "a six-month extension of time, or until November 1, 2020, to place these [Phase II] Project facilities into service."

²

 $^{^{21}\} https://www.ajc.com/news/mobile-morgues-suggest-georgia-coronvirus-crisis-far-from-over/sooG3CY0uYCQppNo5oJplO/$

²² *Id*.

https://wfxl.com/news/local/more-restrictions-in-place-for-dougherty-county-shelter-in-place-order See, e.g., Michigan NatGas Compressor Station Catches Fire, Explodes, Marcellus Drilling News, Jan. 31, 2019, https://marcellusdrilling.com/2019/01/michigan-natgas-compressor-station-catches-fire-explodes; Amy Robinson, Compressor station explosion raises concerns, McKenzie County Farmer, Jan. 5, 2016, https://www.watfordcitynd.com/?id=10&nid=3533; Lynda Clancy, Spectra Energy compressor station offline while engineers investigate Searsmont gas release, Penobscot Bay Pilot, Jan. 7, 2014, https://www.penbaypilot.com/article/spectra-energy-compressor-station-offline-while-engineers-investigate-searsmont-gas-re/26512; Scott Detrow, AP reports explosion at Susquehanna County compressor station, StateImpact Pennsylvania, March 29, 2012, https://stateimpact.npr.org/pennsylvania/2012/03/29/ap-reports-explosion-atsusquehanna-county-compressor-station.

²⁵ See Notice of Extension of Time Request (March 27, 2020) (Accession No. 20200327-3095) ("Sabal Trail was initially required to construct all phases of its facilities and place them into service by February 2, 2018").

²⁶ Request for Extension of Time to Complete Construction of Phase II Project Facilities (March 26, 2020) (Accession No. 20200326-5147).