formations, it is difficult to track where these fluids can migrate. Injection wells are designed to inject in layers of permeable rock that are capped by impermeable rock, however fluid can move laterally. When this happens, toxic fluid can seep into cracks from other wells or cracks in rock layers. Injected fluids can also migrate up abandoned wells under pressure. In many of the older unregulated abandoned wells, cracks in well casings can allow toxic fluids to seep into different layers. Furthermore, this is compounded when LNG and its extraction wastes are transported and exported with little regulated oversight. This lets toxic fluid seep into places it shouldn't be. Leaking injection wells and transport systems can contaminate aquifers, rivers, and lakes with radioactive toxins, endangering communities' drinking water supplies and posing serious threats to human health.

Three Rivers Waterkeeper have a substantial interest in ensuring that lack of oversight by FERC does not lead to more risk to human life, the environment, and climate, and thus request for timely rulemaking and any processes arising therefrom.

G. Lumber Riverkeeper, Winyah Rivers Alliance

The effects of climate change are already evident in the waterways of the Nationally designated Wild and Scenic Lumber River, located in southeastern North Carolina and northeastern South Carolina. Along with erratic shifts in flooding and droughts and an increase in overall temperature in the region, the Lumber River watershed went through two 1000 year flood events due to enormous amounts of rainfall from Hurricanes Matthew in 2016 and Florence in 2018. With the planned Atlantic Coast Pipeline canceled, Piedmont Natural Gas, a wholly owned subsidiary of Duke Energy, constructed the Robeson LNG liquefaction facility (Robeson LNG) and four-mile supply pipeline without any FERC oversight and minimal state oversight. Built in Wakulla, Robeson County, NC, the facility is located in a high poverty area with a population that is 85% American Indian. With associated pipelines to funnel gas back and forth to the plant, Robeson LNG is impacting wetlands that are crucial to preventing future flooding in the Lumber River Watershed. Further this inland LNG, with its ability to clean, store and transfer gas by truck, creates harmful impacts from leaks of methane, other gasses and filtered pollutants into the watershed and atmosphere. This pollution stream has negative effects on the health and life of our streams, climate and the communities that call this area home. Lumber Riverkeeper has a substantial interest in ensuring that lack of oversight by FERC does not lead to more risk to human life, the environment, and climate, and thus