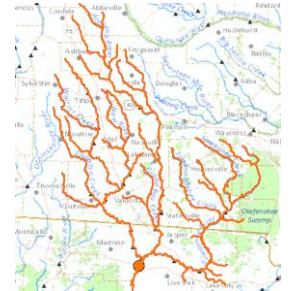


**WWALS Watershed Coalition, Inc.**  
the WATERKEEPER® Alliance Affiliate for the upper  
Suwannee, Withlacoochee, and Alapaha Rivers  
a 501(c)(3) nonprofit charity  
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November 11, 2016

To: John Peconom  
Environmental Project Manager  
Office of Energy Projects  
Federal Energy Regulatory  
Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Norman C. Bay, Chairman  
Cheryl A. LaFleur, Commissioner  
Colette D. Honorable, Commissioner  
Federal Energy Regulatory  
Commission  
888 First Street, N.E.  
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Environmental Protection Division  
Watershed Protection Branch  
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FERC Docket Number: CP15-17

USACE Application Numbers: SAS-2013-00942 (GA), SAJ-2013-03030 (FL), SAM-2014-00655-JSC (AL)

Applicant: Sabal Trail Transmission, LLC, Attn Mr. George McLachlan;

Re: Sabal Trail drilling mud into Withlacoochee River and two unauthorized yards

Dear Mr. Peconom et al.,

Sabal Trail appears to have contradicted itself in its recent responses to WWALS. In addition, at least two yards (one pipe, one contractor) appear never to have been approved by FERC. I ask your prompt investigation of these anomalies and responses to the included questions.

Waiting another two weeks for Sabal Trail's next biweekly report is not prompt. According to Sabal Trail's schedule in its most recent biweekly report, it could be finished with its activities at the affected sites by then. A written response via email by tomorrow would be much more prompt.

## Drilling mud into Withlacoochee River

WWALS asked several questions in [Accession Number 20161024-5049](#), “Sabal Trail intrusion in Withlacoochee River north of US 84 bridge and possible sinkhole: Supplemental Information / Request of WWALS Watershed Coalition, Inc. under CP15-17.”

Sabal Trail responded in [Accession Number: 20161104-5117](#), “Sabal Trail Transmission, LLC submits its Biweekly Status Report for the Sabal Trail Project under CP15-17”.

Those responses were inadequate.

WWALS asked if Sabal Trail was using water from the Withlacoochee River and “By what authorization is Sabal Trail making any intrusion into the Withlacoochee River when FERC permitted them to drill under it, not in it?”

Sabal Trail gave these two responses:

**Response:** *Sabal Trail is permitted to use water from the Withlacoochee River for HDD hydrostatic testing and drilling operation activities but is currently using only municipal water sources.*

**Response:** *There is no construction activity taking place within the river. Sabal Trail has authorization from both the State of Georgia Environmental Protection Division and FERC to use the Withlacoochee as an HDD water source, but a municipal water source is currently being used.*

The question was not “is there a permit somewhere”. The question was “By what authorization”.

**What specific permit or permits authorizes putting water or anything else into the Withlacoochee River, and what specific passages in that permit or permits constitute such authorization?**

**What specific permit or permits authorizes taking water or anything else from the Withlacoochee River, and what specific passages in that permit or permits constitute such authorization?**

Sabal Trail’s first response (to “What is the object in the river?”) and third response (to “Is Sabal Trail dumping wastewater into the Withlacoochee River?”) contradict themselves:

**Response:** *“The object in the river is a turbidity curtain. A turbidity curtain was installed to contain any drilling mud released and to facilitate clean up in accordance with project permits and plans.”*

**Response:** *“No wastewater has been or will be dumped into the Withlacoochee River.”*

**Does Sabal Trail claim drilling mud is not wastewater?**

**Who would be releasing drilling mud into the Withlacoochee River other than Sabal Trail?**

**If Sabal Trail is (or was) not releasing drilling mud into the Withlacoochee River, how is it getting there?**

**Is (or was) the drilling mud coming up through cracks in the river bottom from Sabal Trail's HDD borehole?**

**What is (or was) Sabal Trail sending into the Withlacoochee River through the black pipe in the picture below, which I took the same day as the aerials, October 22nd 2016?**



### **Pipe color and thickness**

Sabal Trail answered the question about pipe colors, saying color does not indicate thickness, but that leads to questions about what thicknesses are being used and how can the public tell.

**What pipe thickness is Sabal Trail using under each of Okapilco Creek, the Withlacoochee River, US 84, the Suwannee River, Interstate 10, and the Santa Fe River?**

**Where on Sabal Trail's alignment maps or other materials filed with FERC or on the pipe itself or posted at each worksite is that thickness specified?**

**What other pipe thicknesses is Sabal Trail using, and where is that specified for each change in thickness along the entire Sabal Trail pipeline route?**

## Unauthorized pipe yard north of Lake City, Florida

The pipe yard north of Lake City, Florida never appears to have been explicitly authorized by FERC. FERC never responded to WWALS' [Accession Number 20160729-5198](#), "Evidence of unregistered Sabal Trail Lake City Pipe Yard and Request of WWALS Watershed Coalition, Inc. for rescission of FERC approval of pre-construction activities under CP15-17-000." Yet you can see in the picture below taken October 22nd 2016 that that pipe yard is in active use.

**In what document is the specific FERC authorization of that Sabal Trail Lake City Pipe Yard?**





## Unauthorized Moultrie, Georgia Contractor Yard CY3-6

On October 17th 2016, Sabal Trail asked for a route variance at a tributary of Hog Creek and one other variance, plus two contractor yards, one of them CY3-6 in Moultrie, Georgia; see [Accession Number: 20161017-5157](#), "Sabal Trail Transmission, LLC Request for Notice to Proceed and Variance Request under CP15-17."

John Peconom on behalf of FERC granted Sabal Trail's request for the two route variances on October 21st 2016 in [Accession Number 20161021-3025](#), "Letter order granting Sabal Trail Transmission, LLC's 2/2/16 request to commence construction in the previously excluded areas re the Sabal Trail Project under CP15-17."

However, in that letter order Peconom did not even mention Sabal Trail's request to authorize a new contractor yard.

The next day after Peconom's FERC Order of October 21st 2016, WWALS took the picture on the right of that contractor yard, at 10:31 AM Saturday October 22nd 2016.

**Do the materials and/or equipment in CY3-6 shown in that picture belong to Sabal Trail?**

**Were any or all of those Sabal Trail materials and/or equipment in CY3-6 before the FERC Order of October 21st?**

**Were any or all of that Sabal Trail materials and/or equipment in CY3-6 before Sabal Trail's request of October 17th for authorization of CY3-6?**

**In what document is the specific FERC authorization of that Sabal Trail contractor yard CY3-6?**



## Prompt response requested

As previously noted, waiting for Sabal Trail's next biweekly report is not prompt and is not adequate for a response, because according to Sabal Trail's schedule it could be finished with the relevant activities, especially at the Withlacoochee River, before that time.

**WWALS requests prompt written responses to all these questions, preferably via email by tomorrow, or by Friday November 11th 2016.**

**WWALS requests FERC to directly inspect as soon as possible the Withlacoochee River Sabal Trail site (the river itself, both HDD sites, and the path in between) and to halt work there until these questions are resolved.**

**WWALS requests written results of the FERC site inspection at the earliest possibility after such FERC site inspection.**

Thank you for your attention to these questions. I await your prompt reply.

Sincerely,

[/s]

John S. Quarterman, President

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

