



WWALS Watershed Coalition, Inc.
3338 Country Club Road #L336
Valdosta, GA 31605
15 November 2014

VIA ELECTRONIC FILING

Ms. Kimberly Bose
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Southeast Market Pipelines Project,
Sabal Trail Transmission, LLC Docket No PF14-1-000
Williams Transco Hillabee Expansion Project, LLC Docket No PF14-6-000

Dear Ms. Bose,

I applaud FERC for getting Sabal Trail to move off of the Withlacoochee River in Hamilton County, Florida. However, the same karst limestone geology underlies the same Withlacoochee River and the Floridan Aquifer in Brooks and Lowndes Counties, Georgia, and WWALS Watershed Coalition continues its opposition to the Sabal Trail pipeline crossing our Withlacoochee River anywhere. Such an unnecessary and hazardous pipeline is also inappropriate anywhere in the Floridan Aquifer.

I would like to call your attention especially to

- 1) The Georgia Water Coalition Dirty Dozen 2014 Item 9
- 2) Sinkhole, aquifer, and drinking water issues
- 3) Corrosion issues in our acidic soil and blackwater rivers

WWALS objects to any of these risks from a pipeline project for which no need has been proven.

1) The Georgia Water Coalition Dirty Dozen 2014 Item 9

The Sabal Trail pipeline has been found one of the worst offenses to Georgia's waters by the Georgia Water Coalition (GWC), which is

"a consortium of 217 conservation and environmental organizations, hunting and fishing groups, businesses, and faith-based organizations that have been working to protect Georgia's water since 2002. Collectively, these organizations represent more than 300,000 Georgians."

Please find attached the press release of 22 October 2014 for the annual Georgia Water Coalition Dirty Dozen 2014, which highlights

"12 of the worst offenses to Georgia's waters. The annual Dirty Dozen shines a spotlight on threats to Georgia's water resources as well as the polluters and state policies or failures that ultimately harm — or could harm — Georgia property owners, downstream communities, fish and wildlife, hunters and anglers, and boaters and swimmers."

The Sabal Trail pipeline was called out directly in the GWC press release:

"The Sabal Trail pipeline's path across southwest Georgia would require boring underground pipelines beneath the Withlacoochee, Flint and Chattahoochee rivers as well as numerous smaller streams, and will course underground above the Floridan aquifer. While the Sabal Trail pipeline's parent companies would have residents believe their 3-foot-diameter pipe is a benign neighbor, the history of gas pipeline accidents and environmental ills paints a different picture. (Item 9)"

Please find attached the two-page writeup for Item 9, "WITHLACOOCHEE RIVER & FLORIDAN AQUIFER: Gas Pipeline Threatens Southwest Georgia Water, Way of Life", which begins:

"Southwest Georgians are fighting an invader—one every bit as worrisome as the boll weevil that destroyed cotton harvests in the 1900s, except this one takes farmers' land as well as crops. The 21st century invader is a 500-mile-long, 3-foot-diameter natural gas pipeline running from Alabama to central Florida that will cut a 159-mile-long, 100-foot-wide swath through at least nine Georgia counties, bringing with it the risk of contaminating the region's well water and rivers and streams through leaks as well as noise and air pollution from a compressor station located in a densely populated area near Albany. The Sabal Trail underground pipeline will feed Florida Power & Light (FPL) electric generation facilities in central Florida, but studies show that the Sunshine State utility could generate the same amount of electricity with solar power while impacting half as much land."

The above wording is by GWC, however WWALS Watershed Coalition (WWALS) submitted Item 9 to GWC as part of WWALS' continuing opposition to the unnecessary and hazardous Sabal Trail pipeline.

This letter, the two-page press release, and the two-page Item 9, are all integral parts of this ecomment to FERC, and thus should all be included in the FERC ecomment system so they will be visible to the public in response to FERC's "SUPPLEMENTAL NOTICE OF INTENT TO PREPARE AN ENVIRONMENTAL IMPACT STATEMENT FOR THE PLANNED SOUTHEAST MARKET PIPELINES PROJECT AND REQUEST FOR COMMENTS ON ENVIRONMENTAL ISSUES RELATED TO NEW ALTERNATIVES UNDER CONSIDERATION" (October 15, 2014).

2) Sinkhole, aquifer, and drinking water issues

As supporting documentation regarding the underlying karst limestone geology of the Withlacoochee River and the Floridan Aquifer, please see "Sustainability of Ground-Water Resources", by W.M. Alley, T.E. Reilly, and O.L. Franke, U.S. Geological Survey Circular 1186, 1999, which says on which reads in Box E on Page 63,

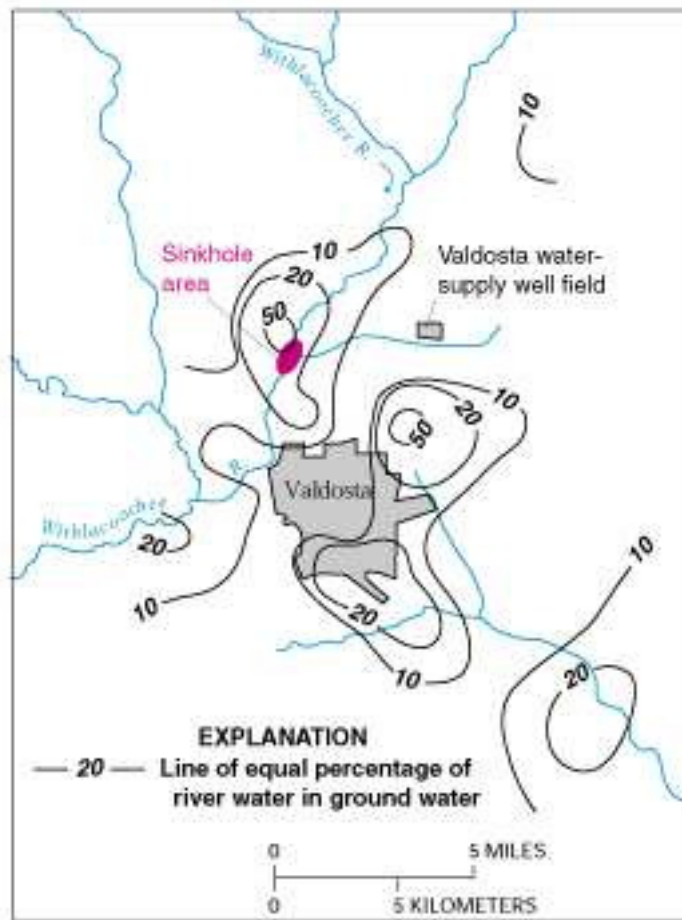
<http://pubs.usgs.gov/circ/circ1186/html/boxe.html>

"The Connection Between Surface-Water Quality and Ground-Water Quality in a Karst Aquifer"

"The Upper Floridan aquifer, which is the sole source of water supply for Valdosta, Georgia, and much of the surrounding area, receives large volumes of direct discharge from the Withlacoochee River through sinkholes in the streambed or off-channel. A highly interconnected conduit system has developed in the Upper Floridan aquifer in this area, which extends at least 15 miles from the sinkhole area. Chloride and isotopic data were used by Plummer and others (1998) to map the percentage of Withlacoochee River water in ground water in the Upper Floridan aquifer (Figure E-1). These data indicate that ground water in parts of the Upper Floridan aquifer contains high percentages of recently recharged Withlacoochee River water. Plummer and others (1998) note that, although the patterns shown in Figure E-1 are generally true over the area, extreme variations can occur at a given location, as would be expected because of the large variations and discontinuities in hydraulic properties in the karst environment and time-varying inflows of river water into the aquifer."



"Sinkhole near the Withlacoochee River. (Photograph by Richard E. Krause, U.S. Geological Survey.)"



"Figure E-1. Estimated percentage of Withlacoochee River water in ground water in the Upper Floridan aquifer, June 1991. (Modified from Plummer and others, 1998.)"

"The strong connection between the Withlacoochee River and ground water in the Valdosta area has created concerns about the potential for contamination of ground-water supplies by contaminants in the river. There also are concerns about the effects of natural organic matter in the river water. For example, in the early 1980s, it was recognized that chlorination of aquifer water produced disinfection by-products in excess of drinking-water standards. This occurred as a result of reaction of chlorine with the high amounts of natural organic matter in the river water recharged to the aquifer."

"The original wells for Valdosta were near the city, in the areas where the aquifer contains a high percentage of river water. The city completed a new set of water-supply wells in the well field indicated in Figure E-1, in an area where the aquifer contains a relatively low percentage of river water. Even with this added level of assurance, it is still necessary to protect the surface waters that supply the aquifer. The source area of concern for ground water is the entire Withlacoochee River Basin upstream from Valdosta."

Alternatives 1, 2, and 4 in FERC's directions to Sabal Trail of August 26, 2014 (Accession Number 20140826-3022), would cross the Withlacoochee River just north of Valdosta in exactly the area described by that 1999 USGS Circular. Plus all three of those alternatives would run down Interstate 75 well within blast radius of Lowndes High School, not to mention within pipe-throwing distance of Valdosta Mall. None of those risks are acceptable.

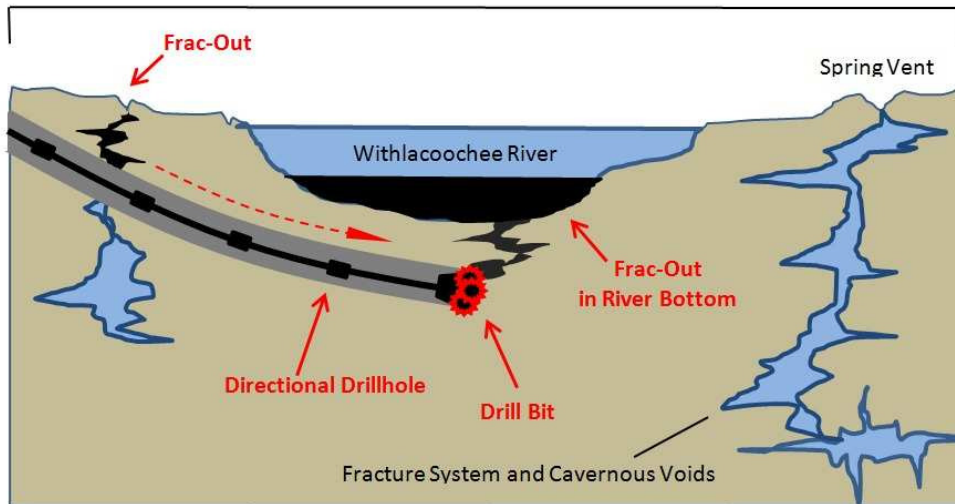
Sabal Trail's preferred route, which would cross the Withlacoochee River from Brooks County into Lowndes County just south of US 84 is downstream from Valdosta, but as you can see from Figure E-1 above, water flow underground is not in the same direction as in the river itself, so there is no guarantee that any sinkhole potentially produced by boring under the river or through the fragile karst limestone underlying this whole area would not pollute Valdosta's water wells. Plus there are numerous wells for subdivisions and houses and farms south of Valdosta, just as there are north of Valdosta.

Preceding FERC's directions to Sabal Trail of 26 August 2014, the Board of Commissioners of Hamilton County, Florida passed Resolution No. 14-10 of 19 August 2014, which referenced "Karst Features and Hydrogeology of the Proposed Sabal Trail Natural Gas Transmission Pipeline Withlacoochee River Crossing - Hamilton County, Florida", by David Brown, August 2014, a copy of which may be found on WWALS' website:

<http://www.wwals.net/wp-content/themes/pianoblack/img//2014/08/HydrogeologyXreport.pdf>

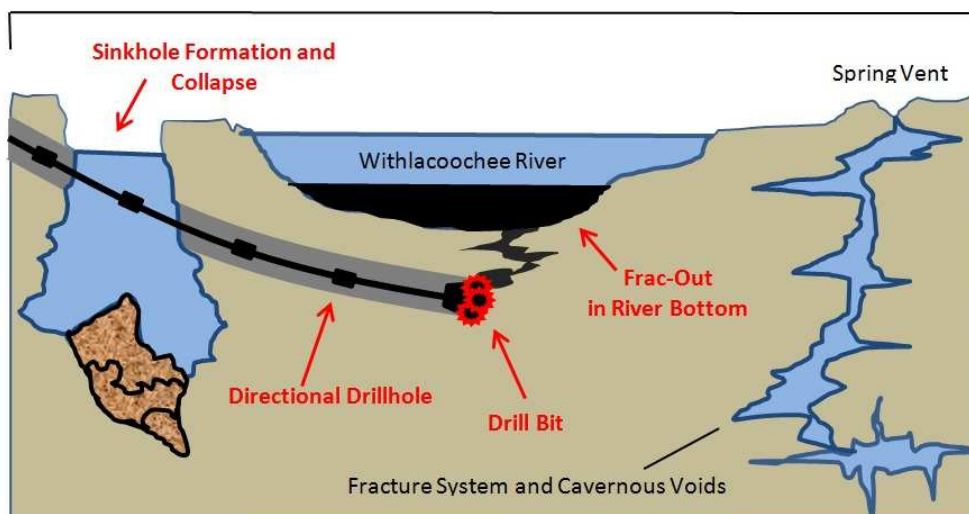
Page 12 of that hydrogeology report illustrates some of the issues of HDD crossing of the Withlacoochee River; issues which are the same in Georgia as they are in Florida.

Approximately 2,500 Lineal Feet Horizontal Directional Drill Hole



"Schematic showing cross-section of the proposed HDD crossing of the Withlacoochee River and hypothetical karst features that could result in a hydrofracture (frac-out), significant loss in drilling fluid and potential loss of the borehole."

Sinkhole Formation and Collapse



"Schematic showing potential sinkhole or collapse feature forming as a result of the proposed HDD crossing of the Withlacoochee River.

A collapse, such as that shown, would result in the loss of the HDD borehole, drilling fluids and result in adverse impacts to environmental features and the water resources."

3) Corrosion issues in our acidic soil and blackwater rivers

In addition, the famously acid soil of this southeast region and the acidic waters of our blackwater rivers, including the Withlacoochee River, could exacerbate the already severe corrosion issues of pipelines. Issues illustrated by the 21 December 2013 PHMSA Final Order to Spectra Energy CEO Greg Ebel for five violations of Spectra's company procedures and federal regulations regarding inadequate corrosion inspection and prevention.

http://www.phmsa.dot.gov/pv_obj_cache/pv_obj_id_4555279B07507EA7A114AC79C8C3B32231D10000/filename/420121009_Final%20Order_12212012.pdf

And illustrated by the PHMSA Final Order of 26 October 2014 for a civil penalty of \$74,300 to Mr. Larry Hjalmarson, VP Safety, Environment & Integrity, Transcontinental Gas Pipe Line Company, LLC., also about inadequate inspection for and prevention of corrosion.

http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Press%20Release%20Files/120123002_Final%20Order_10262012.pdf

Prior to that PHMSA Final Order to Transco, Jason Cannon reported in the Demopolis Times 21 February 2012, "Corrosion cited in pipeline explosion",

<http://www.demopolistimes.com/2012/02/21/corrosion-cited-in-pipeline-explosion/>

"“Although we have systems and processes in place to prevent and identify corrosion, our investigation indicated there were multiple factors working in conjunction that led to this problem not being recognized,” said Transco spokesman Chris Stockton.

“Extremely corrosive soil conditions, combined with failures in the pipeline’s protective coating and cathodic protection system ultimately weakened the pipe, causing it to rupture.””

"Stockton said the rupture forced the company to make several changes in its corrosion control program."

"“These changes are designed to more closely monitor levels of pipeline protection from corrosion, assure a higher degree of protection equipment uptime, and provide higher standards for levels of corrosion protection,” he said. “We are also continuing our investigation into this failure to better enhance our corrosion control procedures in the future.””

Apparently the changes Transco made did not satisfy PHMSA anymore than Spectra's inadequate corrosion inspection and maintenance, because Transco, like Spectra, also received a PHMSA Final Order.

The same Chris Stockton has recently been quoted in Alabama newspapers speaking for the Transco's Hillabee Expansion Project, which is part of the same Southeast Market Pipeline Project as Spectra and FPL's Sabal Trail Transmission pipeline. "Natural gas pipeline plans moving forward," by Mitch Sneed in the Alexander City Outlook, 18 October 2014.

<http://www.alexcityoutlook.com/2014/10/18/natural-gas-pipeline-plans-moving-forward/>

Corrosion in a Transco pipeline in Alabama could contaminate the contents of a Sabal Trail pipeline in Georgia. Corrosion in a Sabal Trail pipeline could cause leaks into our fragile karst limestone that contains our drinking water in the Floridan Aquifer. Leaks at high-pressure could cause sinkholes. This is all in addition to the issue of boring under rivers and through that fragile karst limestone potentially causing sinkholes, and in addition to all the other issues described in Item 9 of the Georgia Water Coalition Dirty Dozen 2014.

Conclusion

There is no reason anyone in WWALS' watersheds should accept any risk for the profit of Williams Company, Spectra Energy, and FPL, when any need for the Sabal Trail pipeline is unproven, and in any case the pipeline does not serve anyone in Georgia.

I urge FERC to deny Sabal Trail's application for a pipeline.

Sincerely,

John S. Quarterman

President
WWALS Watershed Coalition, Inc.
229-242-0102

WWALS is an advocacy organization working for watershed conservation of the Willacoochee, Withlacoochee, Alapaha, and Little River Systems watershed in south Georgia and north Florida through awareness, environmental monitoring, and citizen advocacy.



**Georgia Water Coalition names 2014 “Dirty Dozen”
12 of the worst offenses to Georgia’s water**

For more information contact: Joe Cook, 706-409-0128, jcook@coosa.org; Glenn Dowling, 706-549-4508, glenn@garivers.org; or Chris Manganiello, 706-549-4508, chris@garivers.org

Individual contacts for each item listed in the Dirty Dozen report are available online:
<http://www.garivers.org/gawater/dirtydozen2014.html>

FOR IMMEDIATE RELEASE October 22, 2014 – Today, Georgia’s leading water coalition named its “Dirty Dozen” for 2014, highlighting 12 of the worst offenses to Georgia’s waters. The annual Dirty Dozen shines a spotlight on threats to Georgia’s water resources as well as the polluters and state policies or failures that ultimately harm—or could harm—Georgia property owners, downstream communities, fish and wildlife, hunters and anglers, and boaters and swimmers.

“The Dirty Dozen is not a list of the most polluted water bodies in Georgia, nor are they ranked in any particular order,” said Joe Cook, Advocacy & Communication Coordinator at the Coosa River Basin Initiative. “It’s a list of problems that exemplify the results of inadequate funding for Georgia’s Environmental Protection Division (EPD), a lack of political will to enforce existing environmental protections, and ultimately misguided water planning and spending priorities that flow from the very top of Georgia’s leadership.”

The Coalition’s full report details the history of each site and provides solutions to correct these ongoing problems and eliminate the listed threats. A short list can be found below. The full report—including updates from previous Dirty Dozen reports—is available online:
<http://www.garivers.org/gawater/dirtydozen2014.html>

“Over the past decade, the health of Georgia’s rivers, wetlands, lakes and streams and the safety of Georgia citizens has been compromised as funding for Georgia’s Environmental Protection Division has not kept pace with population and economic growth,” said Jennette Gayer, Environment Georgia Research and Policy Center Advocate.

The problems highlighted in the report include:

- EPD announced—on Earth Day—that it would no longer enforce laws designed to protect Georgia’s coastal marshlands, and in July, a long-standing protection for well water on the Georgia coast expired because of inaction on the part of the administration and legislature. (Items 2 and 3)
- The Sabal Trail pipeline’s path across southwest Georgia would require boring underground pipelines beneath the Withlacoochee, Flint and Chattahoochee rivers as well as numerous smaller streams, and will course underground above the Floridan aquifer. While the Sabal Trail pipeline’s parent companies would have residents believe their 3-foot-diameter pipe is a benign neighbor, the history of gas pipeline accidents and environmental ills paints a different picture. (Item 9)

- Stormwater from industrial facilities creates ongoing pollution problems in the Chattahoochee River largely because there are only two EPD staffers responsible for inspecting and monitoring more than 2,700 industrial sites. (Item 4)
- State spending to expand Georgia's water supplies has only aggravated a two-decade-long water war with Alabama and Florida. Since taking office, Gov. Deal has directed \$196.3 million to construct dams and reservoirs—many of questionable need—in an attempt to store and divert water from downstream neighbors. Yet, from 2010 to early 2013, the state spent just \$10.7 million to help communities use their existing water supplies more efficiently. (Item 1)

"The Georgia Water Coalition publishes this annual list as a call to action for our state's leaders and its citizens to come together to correct pollution problems, eliminate the wasteful use of our tax dollars and restore our streams, rivers, lakes and coastal wetlands," said Glenn Dowling, Executive Director of Georgia River Network.

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The Georgia Water Coalition is a consortium of 217 conservation and environmental organizations, hunting and fishing groups, businesses, and faith-based organizations that have been working to protect Georgia's water since 2002. Collectively, these organizations represent more than 300,000 Georgians.

2014 Dirty Dozen

1. Georgia's Water: State Water Policy Threatens Streams, Aggravates Water Wars, Wastes Tax Dollars
2. Georgia's Coastal & Freshwater Wetlands: EPD Refuses to Enforce Clean Water Laws
3. Floridan Aquifer: State Leaders Drop Well Water Protections to Experiment With Risky Water Injection Schemes
4. Chattahoochee River: Weakened State Agency Allows Industries to Foul River
5. Coosa River: Long Delayed State Clean Up Plan Allows Power Company to Continue Polluting
6. Flint River: Textile Manufacturer's Pollution, State Water Policy Create Conundrum
7. Savannah River: Pollutants, Nuclear Reactors Suck Water and Life out of Savannah
8. Georgia's Small Streams and Wetlands: National Rule To Protect Georgia's Streams and Wetland Treasures Under Attack
9. Withlacoochee River & Floridan Aquifer: Gas Pipeline Threatens Southwest Georgia Water, Way of Life
10. Turtle River: Toxic Legacy Poisons Dolphins, Drinking Water
11. Satilla River: Toxic Legacies Threaten Waycross Residents
12. Little Satilla Creek & Penholloway Creek: Titanium Mine Threatens Wetlands, Well Water

Individual contacts for each item listed in the Dirty Dozen report are available online:

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2014's Worst Offenses Against GEORGIA'S WATER

WITHLACOOCHEE RIVER & FLORIDAN AQUIFER

Gas Pipeline Threatens Southwest Georgia Water, Way of Life

INTRODUCTION:

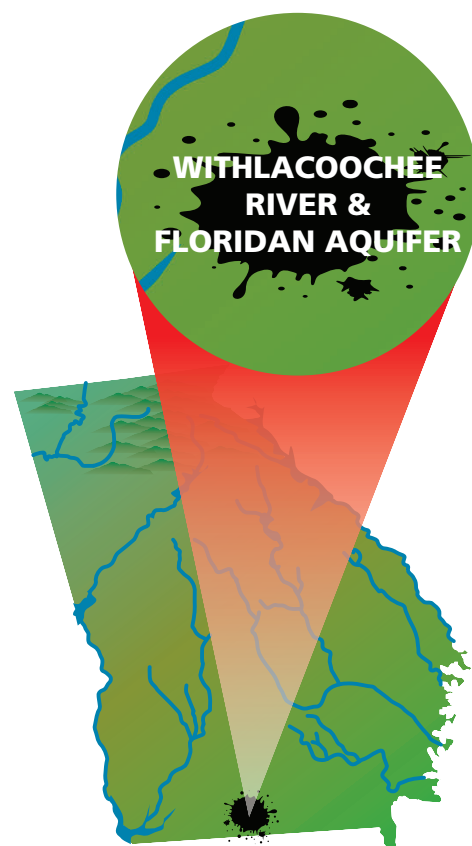
Southwest Georgians are fighting an invader—one every bit as worrisome as the boll weevil that destroyed cotton harvests in the 1900s, except this one takes farmers' land as well as crops. The 21st century invader is a 500-mile-long, 3-foot-diameter natural gas pipeline running from Alabama to central Florida that will cut a 159-mile-long, 100-foot-wide swath through at least nine Georgia counties, bringing with it the risk of contaminating the region's well water and rivers and streams through leaks as well as noise and air pollution from a compressor station located in a densely populated area near Albany. The Sabal Trail underground pipeline will feed Florida Power & Light (FPL) electric generation facilities in central Florida, but studies show that the Sunshine State utility could generate the same amount of electricity with solar power while impacting half as much land.

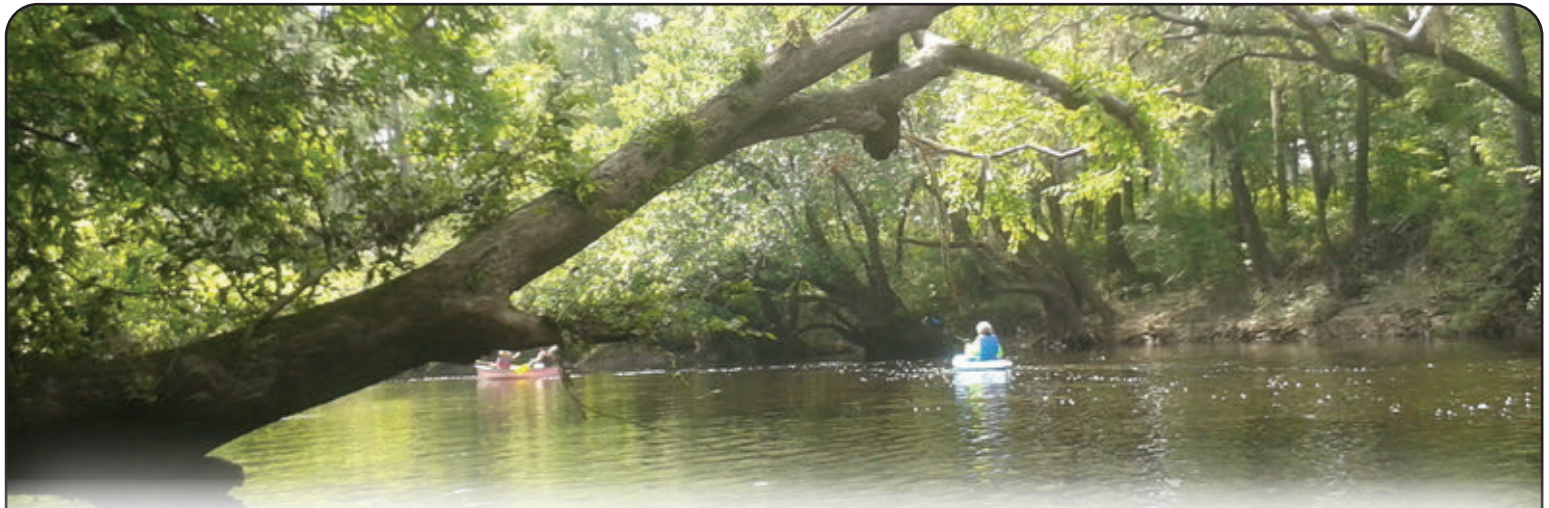
THE WATER BODIES:

The Sabal Trail pipeline's path across southwest Georgia would require boring underground pipelines beneath the Withlacoochee, Flint and Chattahoochee rivers as well as numerous smaller streams, and will course underground above the Floridan aquifer. The Floridan aquifer is the region's most important water source, providing more than 600 million gallons a day to irrigate crops, run industries and supply homes and businesses with drinking water. The currently proposed pipeline route runs through Stewart, Webster, Terrell, Lee, Dougherty, Mitchell, Colquitt, Lowndes and Brooks counties—a swath of land that is home to rare wildlife including the Georgia state reptile—the federally endangered gopher tortoise—along with the federally protected indigo snake and red cockaded woodpecker. Other communities in the region may be impacted depending on the final route chosen.

THE DIRT:

While the Sabal Trail pipeline's parent companies, Spectra Energy and NextERA Energy would have residents believe their 3-foot-diameter pipe is a benign neighbor, the history of gas pipeline accidents and environmental ills paints a different picture.





A 2011 pipeline explosion in Alabama incinerated 65 acres of forest, and a 1994 explosion at one of Spectra's lines in New Jersey set fire to an apartment complex, injuring dozens and leaving hundreds homeless.

Given the karst geology of southwest Georgia, the dangers of an underground pipeline are especially profound. Sinkholes are increasingly common in the region and may cause pipeline leaks that could easily contaminate the underground aquifers that serve as the drinking water source for many rural residents.

Meanwhile residents of Albany are particularly alarmed because a compressor station would be located near homes, churches and parks. Pipeline compression stations are a major source of noise pollution and also emit nitrogen oxides and volatile organic compounds that can cause respiratory problems.

Though these dangers are real, the political cards seem stacked against residents of southwest Georgia. Spectra Energy earlier this year donated \$10,000 to Gov. Nathan Deal's election campaign, and Florida Gov. Rick Scott, also up for reelection, is an investor in the pipeline project. The Federal Energy Regulatory Commission (FERC) which is charged with approving the pipeline's route through Georgia, is a federal agency that receives all of its funding from fees collected from the energy industry.

One of the issues that FERC will weigh is the project's "need," and that need is very much in question. In documents filed with FERC and in public testimony, Sabal Trail Transmission LLC confirmed that solar power facilities built on half the acreage that will be required for the 500-mile long pipeline could produce the same amount of energy. In comments to FERC, the U.S. Environmental Protection Agency questioned the need for the pipeline, citing data that shows that electricity demand nationwide is declining due to increased efficiency.

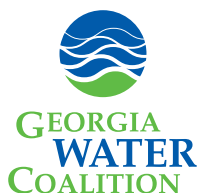
Spectra Energy and NextERA Energy expect to file for approval for the project with FERC later this year and hope to begin construction by June 2016. Before any work commences, the companies must first secure air quality permits from Georgia's Environmental Protection Division (EPD) as well as water permits from Florida environmental regulators.

WHAT MUST BE DONE:

With the politics of gas pipelines stacked against them, impacted residents must organize and forcefully voice their opposition to derail this project.

Citizens should urge...

- local governments to adopt land use and other ordinances that prevent pipeline construction in vulnerable lands and neighborhoods.
- EPD to deny air quality permits for the project; and
- FERC to deny any certifications of need for the project, as well as all possible routes



For More Information Contact:

John S. Quarterman, WWALS Watershed Coalition (Willacoochee, Withlacoochee, Alapaha and Little Rivers), 229-242-0102, wwalswatershed@gmail.com
Gordon Rogers, Flint Riverkeeper, 229-435-2241, gordon@flintriverkeeper.org
Stephanie Stuckey-Benfield, GreenLaw, 404-659-3122, sbenfield@greenlaw.org