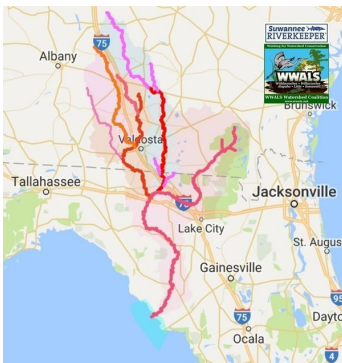
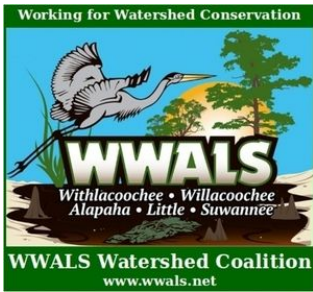


November 13, 2018



PO Box 88, Hahira, GA 31632
850-290-2350
wwalswatershed@gmail.com
www.wwals.net

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



To: Director James Urisko <James.Urisko@dot.gov>, 404-832-1150
Southern Region Office
PHMSA Office of Pipeline Safety
233 Peachtree Street NE, Suite 600
Atlanta, GA 30303
Cc: Community Liaisons:
James Kelly <James.Kelly@dot.gov>, 404-990-1848
Arthur Buff <Arthur.Buff@dot.gov>, 404-226-6153

Re: **Sabal Trail Hildreth Compressor Station Leak 2018-09-29**

Dear Director Urisko,

For more than 20 hours starting Saturday, September 29, 2018, the Sabal Trail interstate natural gas pipeline leaked “26.40516 MMscf” of “Non-odorized natural gas” and “10,405.5 lbs” of “VOC” (presumably Volatile Organic Compounds) at its Hildreth Compressor Station in Suwannee County, Florida. A week later Sabal Trail filed a report with the Florida Department of Environmental Protection (FDEP), the text of which is appended to this letter.

I have several questions:

1. Why did Sabal Trail take more than a week to report this incident to FDEP?
2. Did Sabal Trail report this incident to PHMSA? If so, please send a copy of that report, or how to get it.
3. Has PHMSA filed a report about this incident? If so, please send a copy or how to get it.
4. Is PHMSA investigating this incident? If so, when will the investigation be complete? Are there any interim results or opportunities for public comment into the process?
5. Since Sabal Trail wrote “nothing in the yard caused alarms” and “Site is unmanned,” how did Sabal Trail discover this leak?
6. What changes has Sabal Trail put in place to detect such a leak in the future?
7. What changes has Sabal Trail put in place to prevent such a leak in the future?
8. Why did it take more than 20 hours for Sabal Trail to stop the leak?
9. How did Sabal Trail stop the leak?
10. What changes has Sabal Trail put in place to stop such a leak in future before it leaks for such a protracted period?
11. What were those VOCs? Specific chemicals and amounts for each, please.
12. Why did Sabal Trail say “Lightning strike cause fuse to blow” when local people and weather services report no such weather there on that day? See for example: <https://www.weather.gov/help-past-weather>
13. Is Sabal Trail referring to some earlier lightning strike? If so, what date? And why did Sabal Trail not find and fix the problem before it produced the leak of this incident?
14. Were there downstream effects of the leak? If so, what effects, and affecting whom?
15. Is Sabal Trail claiming *force majeure* for this incident?
16. What is being done to capture and absorb or mitigate the effects of released methane and VOCs? Is there a system in place or can one be put in place?

Thank you for your attention, and I look forward to speedy answers to these questions.

Sincerely,
John S. Quarterman,
Suwannee Riverkeeper
WWALS Watershed Coalition
229-242-0102
contact@suwanneeriverkeeper.org

Attachments: Map and report from Florida Public Notice of Pollution

The image shows a map of Florida with several yellow location pins. One pin in the north-central region is highlighted with a red square. A pop-up window is open over this pin, displaying the following information:

Hildreth Compressor Station Natural Gas Release Incident

Incident #

Incident Name	Hildreth Compressor Station Natural Gas Release Incident
Incident Report	Company: Sabal Trail Transmission LLC Site: Hildreth Compressor Station Air Permit No. 1210473-001-AC Event Start Date/Time: 9/29/18 at 14:00 Event End Date/Time: 9/30/18 at 10:20 Line Pressure: 226 psi Valve Size: 24 Material: Non-odorized natural gas Total Gas Volume Released: 26.40516 MMscf Total VOC Released: 10,405.5 lbs Event description: Lightning strike cause fuse to blow which tripped release valve on fuel system to open and vent gas to atmosphere. Because

The map also shows labels for Valdosta, Gainesville, and Ocala. At the bottom right, it says 'POWERED BY esri' and at the bottom left, 'Esri, HERE, Garmin, NGA, USGS, NPS | Esri, HERE, NPS | FDEP'.

Hildreth Compressor Station Natural Gas Release Incident

Incident #

Incident Name Hildreth Compressor Station Natural Gas Release Incident

Incident Report Company: Sabal Trail Transmission LLC

Site: Hildreth Compressor Station Air Permit No. 1210473-001-AC

Event Start Date/Time: 9/29/18 at 14:00 Event

End Date/Time: 9/30/18 at 10:20

Line Pressure: 226 psi Valve

Size: 2½

Material: Non-odorized natural gas

Total Gas Volume Released: 26.40516 MMscf

Total VOC Released: 10,405.5 lbs

Event description: Lightning strike cause fuse to blow which tripped release valve on fuel system to open and vent gas to atmosphere. Because of such low pressure release, nothing in the yard caused alarms and the engine continued to run as if no problem had occurred . Site is unmanned.

Report Date/Time 10/9/2018, 7:02 AM

Facility Name Hildreth Compressor Station

Facility Address Line 1

Facility Address Line 2

Facility Directions

Facility City

Facility State FL

Facility ZIP

Contact Name Claudio Galli

Contact Email claudio.galli@enbridge.com

Contact Phone # 7136276283

Affected Counties Suwannee