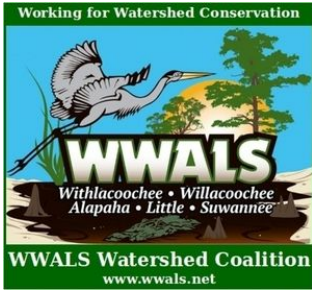
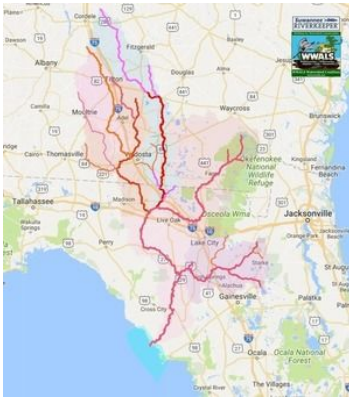


December 19, 2018



To: Chairman Neil Chatterjee and Commissioners
Cheryl A. LaFleur, Richard Glick, Kevin J. McIntyre, and Bernard L. McNamee
Cc: Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE, Room 1A
Washington, DC 20426
Via email and e-filing



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

FERC Commissioners and Secretary,

Sabal Trail already leaked, despite years of safety assurances by Sabal Trail and FERC.

We only know about this leak at Sabal Trail's Hildreth Compressor Station in Suwannee County, Florida, on September 29, 2018, because Sabal Trail reported it a over a week later, on October 9, 2018, to the Florida Department of Environmental Protection (FDEP), and FDEP publishes all spill reports online the same day, including that one (copy attached).

On November 13, 2018, I sent the Pipeline and Hazardous Materials Safety Administration (PHMSA) a list of sixteen questions about that leak (copy attached).

The only response I have received was by email the next day from James A. Kelly, "Community Liaison – Southern Region, U.S. DOT, PHMSA, Pipeline Safety":

"Thank you for contacting the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. This initial response is to acknowledge your inquiry regarding the Sabal Trail Hildreth Compressor Station leak of September 29, 2018. We are reviewing the requested information internally and will follow-up as soon as possible."

I have today sent PHMSA two more questions (copy attached):

- 17. Why, a year and a half after Sabal Trail declared itself operational, are none of Sabal Trail nor the other components of the Southeast Market Pipelines Project (SMPP) shown in PHMSA's Public Map Viewer?
- 18. Why is the Sabal Trail Hildreth Compressor Station leak not shown in PHMSA's Public Map Viewer? <https://pvnpm.phmsa.dot.gov/PublicViewer/>

During the permitting for Sabal Trail and the other SMPP pipelines, FERC repeatedly told us that PHMSA handles pipeline safety.

We have seen no evidence that PHMSA has done anything about this incident, so I must ask FERC to please answer these eighteen questions I sent PHMSA.

Similarly, we have seen no evidence that PHMSA ever did anything about the previous repeated leaks of hazardous Mercaptan odorant at Sabal Trail's Dunnellon Compressor Station site, in which, according to Marion County Fire Rescue, Sabal Trail *"wrapped the area with towels and sprayed a deodorant but more than likely will continue to leak until line is fixed."* FERC never responded to my inquiry of 11 August 2017 about those leaks,¹ nor to my earlier inquiries (cited in that one). The Occupational Safety and Health Administration (OSHA) did at least respond with evidence that the Mercaptan odorant leaked is a hazardous substance.²

In a response filed with FERC after the second series of Dunnellon odorant leaks, Sabal Trail said it was not required to notify any state or federal agencies about odorant leaks, and it acknowledged that it was notified of the leak.³ Sabal Trail did not detect the leak; local citizens did, and called it in via 911 to Marion County Fire Rescue, which arrived before Sabal Trail did.

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850-290-2350
wwalswatershed@gmail.com
www.wwals.net

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¹ FERC Accession Number 20170811-5152, "Chronic Leaks at Sabal Trail Dunnellon Compressor Station Site, Marion County, Florida; Supplemental Information / Request of WWALS Watershed Coalition, Inc. under CP15-17". https://elibrary-backup.ferc.gov/idmws/file_list.asp?document_id=14594796, <http://wwals.net/?p=35932>

² "OSHA to WWALS about odorant leak, Dunnellon Compressor Station 2017-08-28," WWALS, <http://wwals.net/?p=37019>

³ FERC Accession Number 20170815-5126, "Sabal Trail Transmission, LLC response to August 11 Letter of WWALS Watershed Coalition under CP15-17." https://elibrary.ferc.gov/idmws/file_list.asp?document_id=14595529, <http://wwals.net/?p=35993>

FERC told us in its 2 February 2016 FERC Order⁴ giving Sabal Trail federal eminent domain (see also the Final Environmental Impact Statement, FEIS, Section 3.13, pages 3-274 passim)⁵ that:

“The final EIS explains that the applicants will install data acquisition systems that monitor pipeline flows and pressures at various points along the system. In the event an incident occurs along the pipeline, the data acquisition systems system will enable the pipeline to remotely or automatically close mainline valves and will utilize a combination of radio and satellite communications to transmit data from the pipeline to the applicants’ current gas control centers.”

Yet we have seen no evidence that Sabal Trail detected the Hildreth Compressor Station Leak, either, and by its own report to FDEP the leak was not automatically closed.

That same section of the FEIS tells us that:

“The PHMSA ensures that people and the environment are protected from the risk of pipeline incidents. This work is shared with state agency partners and others at the federal, state, and local level.”

We see no evidence that PHMSA is protecting people or environment.

The FEIS also says in section 3.7.2.10 Pipeline Leaks (emphasis added):

“However, if a pipeline leak were to occur beneath a waterbody crossing, natural gas would percolate through the soil and sediments underlying the stream, rise through the water column of the stream, and rapidly dissipate into the atmosphere. Considering the narrow width of the majority of the waterbodies that would be crossed and their relatively shallow depth, most of the natural gas would be rapidly released to the atmosphere, and any change in water quality resulting from possible oxygen displacement would be minor. **Because fish are mobile, most would have the ability to avoid or leave the areas with unfavorable environmental conditions resulting from such a release.** We have determined the chance for a pipeline leak to affect aquatic resources is extremely remote.”

FERC’s glib determinations do not reassure us about the safety of the spawning grounds of the Gulf Sturgeon, where the Sabal Trail pipeline crosses under the iconic Outstanding Florida Water, the Suwannee River. Especially after PHMSA’s lack of oversight of the repeated Dunnellon Compressor Station site odorant leaks and of the Hildreth Compressor Station methane and VOC leak, we are not reassured of the safety of Sabal Trail for people or environment anywhere else, either, including under the Withlacoochee River in Georgia, and the Santa Fe and Withlacoochee (south) Rivers in Florida, and by numerous schools, businesses, and homes.

If FERC cannot answer for these leaks, and PHMSA does not, please tell us: who is in charge of pipeline safety?

Further, at the ends of the SMPP pipeline chain there are inland liquid natural gas (LNG) export terminals authorized by the U.S. Department of Energy Office of Fossil Energy (FE) after FERC disclaimed responsibility for them in a 2015 FERC Order, despite a dissent by then-Commissioner Norman Bay.⁶ During permitting for Sabal Trail, FERC assured us that there was no connection, even though for example Strom, Inc., now locating in Crystal River, Florida, had a FERC docket open at the time in which it referred to its FE docket that spelled out that Strom expected Sabal Trail to be one of its gas sources.

Who is in charge of safety for such terminals?

Given FERC’s repeated assurances of safety that do not seem to be borne out by the evidence, it may even be worth Commissioners, especially new Commissioners, pondering whether FERC pipeline and LNG terminal decisions are shielded by the Doctrine of Qualified Immunity of *Harlow v. Fitzgerald*, 457 U.S. 800, 815 (1982).⁷

I look forward to prompt answers from FERC to the questions PHMSA has not answered, and to the questions of who is in charge of pipeline safety, and of LNG export terminal safety.

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

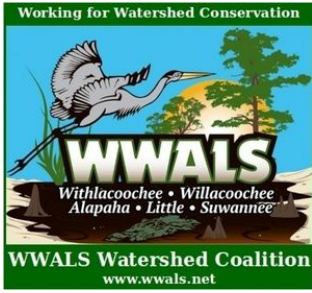
Attachments: letters from WWALS to PHMSA of 2018-11-13, 2018-12-19

⁴ “ORDER ISSUING CERTIFICATES AND APPROVING ABANDONMENT,” 154 FERC ¶ 61,080, Florida Southeast Connection, et al., 2 February 2018, <https://www.saj.usace.army.mil/Portals/44/docs/regulatory/Items%20of%20Interest/SMP%20Pipeline%20Project/SAJ-2013-03030%2004%20FERC%20Certificate.pdf?ver=2016-08-15-172843-597>

⁵ Notice of the final EIS was published in the Federal Register on December 24, 2015. 80 Fed. Reg. 80,354.

⁶ FERC Document Number 20180725-5234, 25 July 2018, “Comments of WWALS Watershed Coalition, Inc. under PL18-1”, https://elibrary-backup.ferc.gov/idmws/file_list.asp?document_id=14691777, <http://wwals.net/?p=45230>

⁷ “THE DOCTRINE OF QUALIFIED IMMUNITY. WHAT IS IT AND WHY DO I CARE?” Jim Chapman, PATC, May 2016, http://www.patc.com/weeklarticles/2016_qualifiedimmunity_chapman.shtml



December 19, 2018

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 A. Kelly <James.Kelly@dot.gov>, 404-990-1848
Arthur Buff <Arthur.Buff@dot.gov>, 404-226-6153



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

Dear Director Urisko,

On November 13, 2018, I sent you a list of sixteen questions about Sabal Trail's leak at its Hildreth Compressor Station in Suwannee County, Florida, on September 29, 2018.

The only response I have received was by email the next day from James A. Kelly, saying:

"Thank you for contacting the Office of Pipeline Safety, Pipeline and Hazardous Materials Safety Administration. This initial response is to acknowledge your inquiry regarding the Sabal Trail Hildreth Compressor Station leak of September 29, 2018. We are reviewing the requested information internally and will follow-up as soon as possible."

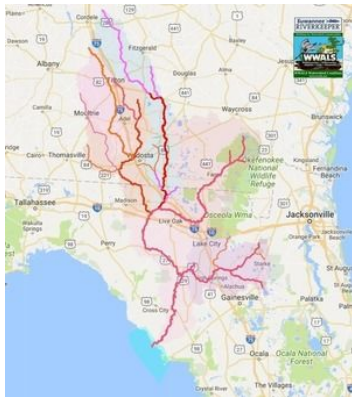
Let me add two more questions.

- 17. Why, a year and a half after Sabal Trail declared itself operational, are none of Sabal Trail nor the other components of the Southeast Market Pipelines Project (SMPP) shown in PHMSA's Public Map Viewer?
- 18. Why is the Sabal Trail Hildreth Compressor Station leak not shown in PHMSA's Public Map Viewer? <https://pvnpm.phmsa.dot.gov/PublicViewer/>

During the permitting for Sabal Trail and the other pipelines in the Southeast Market Pipelines Project, we were repeatedly assured by FERC and Sabal Trail that PHMSA handles pipeline safety.

Please let me know when I can expect answers to these questions.

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



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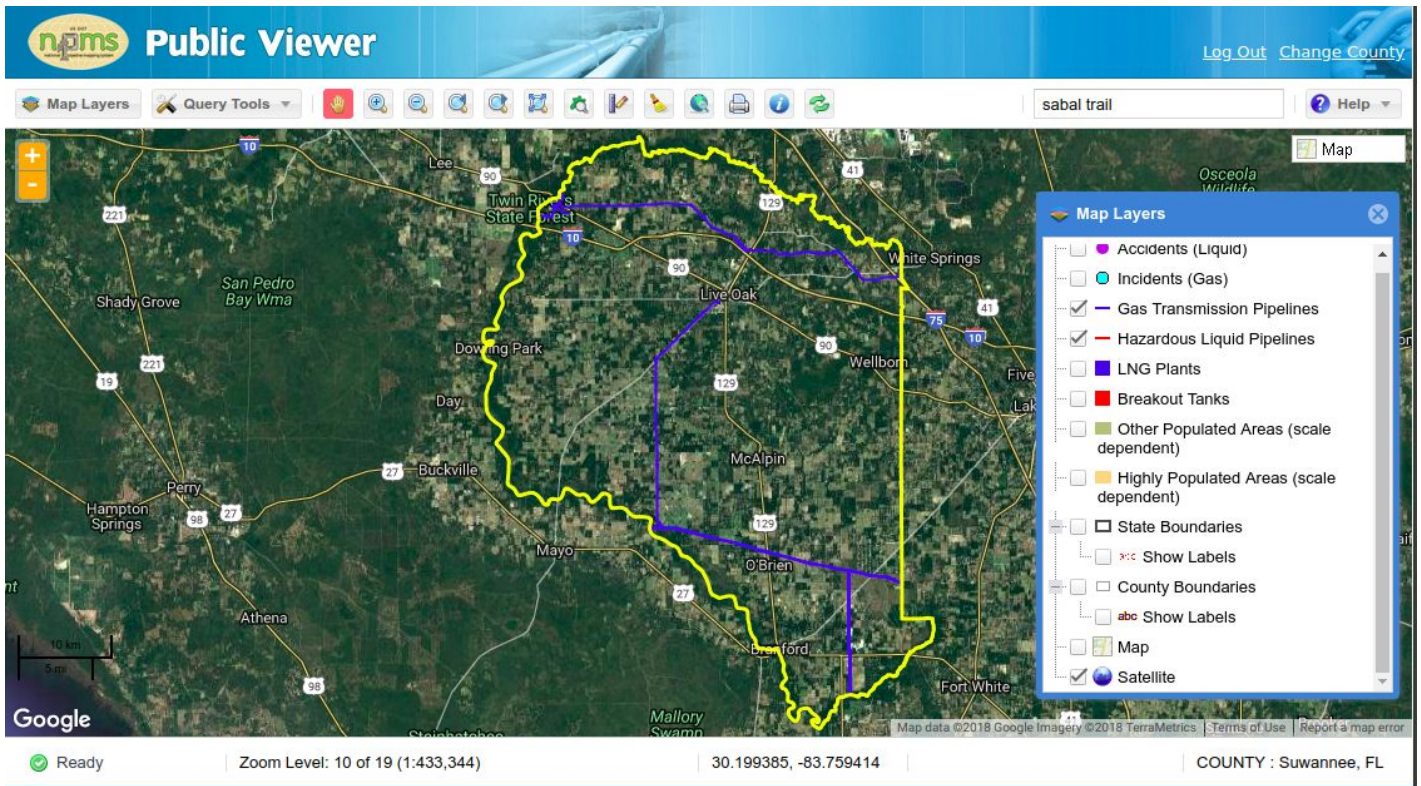
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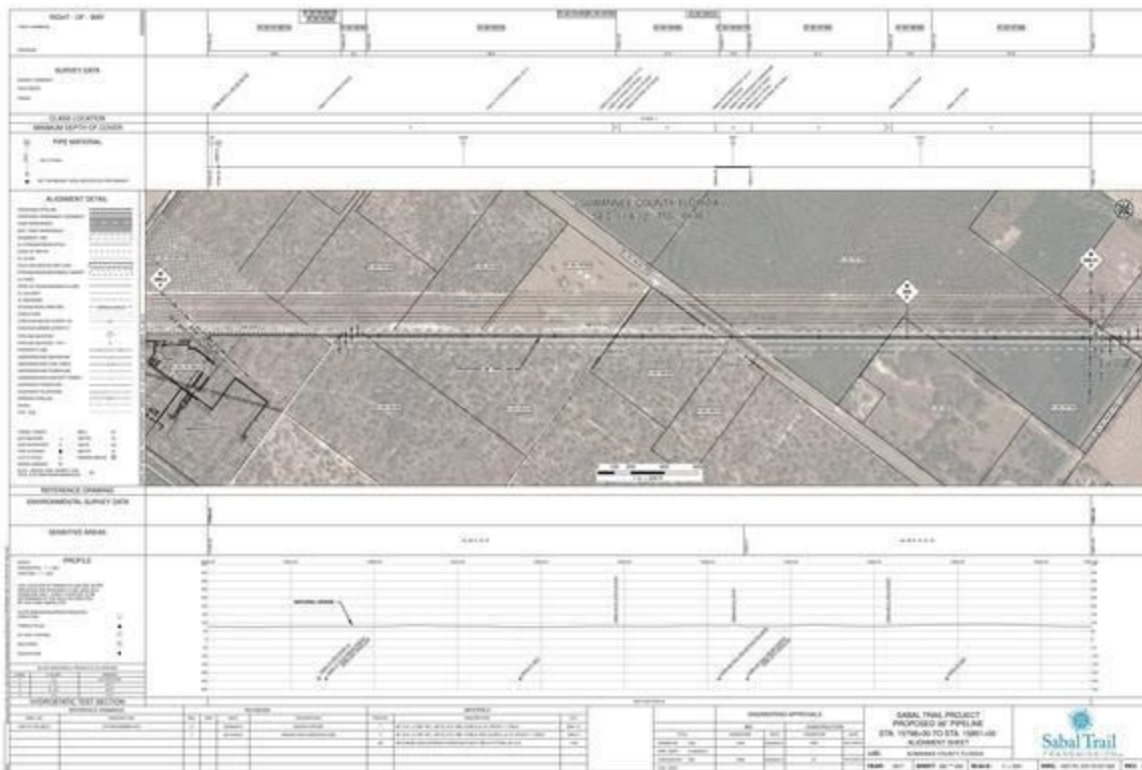
Attachments:

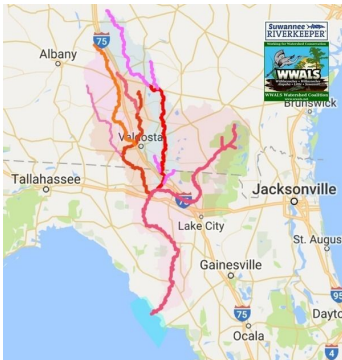
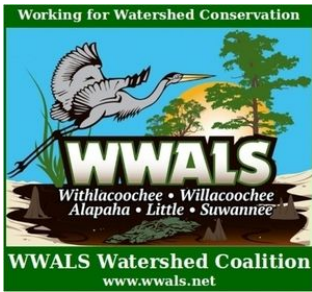
Screenshot of PHMSA Public Map Viewer for Suwannee County, Florida
Sabal Trail Alignment Map showing Hildreth Compressor Station location

Screenshot taken 2018-12-17 of PHMSA Public Map Viewer for Suwannee County, Florida, which does not include Sabal Trail:



Sabal Trail's 2018-04-07 Alignment Map 1657-PL-DG-70197-302, STA. 15798+00 TO STA. 15851+00, including its Hildreth COMPRESSOR STATION, at about Mile Point 300, near CR 49 and 210th Place, SUWANNEE COUNTY, FLORIDA, at about [30.0643120, -82.8786160](https://www.google.com/maps/place/30.0643120,-82.8786160).





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November 13, 2018

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 popup 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

At the bottom of the map, there is a footer: "Esri, HERE, Garmin, NGA, USGS, NPS | Esri, HERE, NPS | FDEP" and the "POWERED BY esri" logo.

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