**ISSUE: PIPELINE SAFETY – INCREASED SPEED OF CORROSION WITH INCREASED COMPRESSION**

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Dear FERC Leadership:

I am an intervenor in the Northeast Supply Enhancement Project (CP17-101). I am concerned because the DEIS did not address the potential for increased speed of corrosion in pipelines associated with this project that could result from the addition of compression which, though the new velocity was not identified in publically-available documents, the added compression for the NESE Project in PA and NJ is expected to increase the velocity with which the gas travels from origin to destination. I do recognize that Williams/Transco claims that its current Maximum Allowable Operating Pressure (MAOP) of 800 pounds per square inch would not be increased on any of the associated pipelines. However, there was no apparent analysis or recommendations in the DEIS related to potential unanticipated speed of corrosion in pipelines from increased velocity.

FERC staff stated: “Other than connecting Compressor Station 206 to Transco’s existing Mainline pipeline system, Transco is not proposing to modify the Mainline system near the compressor station, and the Mainline system’s current Maximum Allowable Operating Pressure (MAOP) of 800 pounds per square inch would remain unchanged upstream and downstream of the new station. Therefore, public safety concerns regarding the existing Mainline system near Compressor Station 206 are outside the scope of our review for the NESE Project. However, we note that Transco’s existing Mainline A and Mainline C pipelines were constructed in 1950 and 1969, respectively, and were relocated and replaced in 1987 to accommodate an expansion of the quarry. The pipelines are now about 0.4 mile from the nearest quarry face and Transco stated that there have been no operational issues on their system attributable to the Trap Rock quarry.” (DEIS, page ES-5)

Of note – Williams/Transco moved and replaced the segment of pipeline at Trap Rock Quarry in 1987, and there is no readily available information about the “class” of pipeline for the rest of Mainline A ad Mainline C. I assume that the remaining parts of these lines are Class 1 and were constructed in 1950 and 1969. If this is not accurate, FERC should request that Williams/Transco publish detailed information about the age of the components of Mainline A and Mainline C.

As was found in the accident in Pennsylvania (pipeline explosion near Delmont Compressor Station in Salem Twp. PA on April 29, 2016), the exploded pipeline segment was constructed in 1981. Released natural gas ignited and produced a crater 30 feet wide, 50 feet in length, and 12 feet deep and a burn zone of approximately ¼ mile radius. The explosion resulted in the ejection of approximately

24.5 feet of 30-inch pipe, which landed approximately 100 feet from the rupture site.” … “The preliminary investigation has identified evidence of external corrosion at circumferential welds at the Failure Site. The pattern of corrosion indicates disbondment of the coating material applied to the girth weld joints.” … “The Failure caused one known injury to a man residing near the Failure Site, with third-degree burns over 75% of his body. The injured man was admitted to a local hospital.” (PHMSA – July 19, 2016 – Amended Corrective Action Order - CPF No. 1-2016-1004H)

Deferring to PHMSA for safety oversight during FERC’s review of the construction plans seems to be an abdication of some of FERC’s principle purposes in developing the DEIS (page 1-3):

* describe the affected environment as it currently exists in the Project area;
* identify and assess potential impacts on the natural and human environment that would result from constructing and operating the Project;
* describe and evaluate reasonable alternatives to the Project that would avoid or substantially reduce adverse environmental effects while still meeting the Project’s objectives;
* identify and recommend specific mitigation measures, as necessary, to avoid or further minimize environmental impacts; and
* encourage and facilitate involvement by the public and interested agencies in the environmental review process.

FERC concluded that “Transco would design, construct, operate, and maintain Compressor Station 206, including the inlet and outlet pipelines, in accordance with modern engineering practices that meet or exceed the DOT Minimum Federal Safety Standards which are protective of public safety, and added measures would be put in place to further ensure that the facility would not be affected by periodic blasting at the Trap Rock quarry.” (DEIS, page ES-5) However, this does not account for any preventative and/or monitoring measures to account for unanticipated increases in corrosion of pipelines that could cause a leak or explosion. Additionally, these “added measures” have not been cited, and analyses of their effectiveness have also not been provided to the public.

Thus, I request that FERC require more information from Williams/Transco about the specific measures they will commit to using in design, construction and monitoring of the propose pipeline loops to mitigate effects of unanticipated increased speed of corrosion. Following FERC’s independent analysis of this information, I request that FERC issue a revised or supplemental DEIS and allow the public additional time of at least 45 days to review and comment on it.