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Title:

Comments: Packet #37: Potential pipeline explosions resulting from USFS sanctioning frack leases must be assessed as costs of your past actions

To the Wayne Plan Revision team:

The Wayne and USFS sanctioning of leasing federal minerals under the Wayne for fracking clearly has high potential economic costs to the region, thus condemning the 2006 Plan used to justify the 2012 (non-NEPA-based) RONI and SIR and subsequent unjustified (non NEPA-based) consent to the BLM to lease Wayne minerals for fracking. Some of the potential costs to the region and the climate are illustrated almost daily with Appalachian pipeline explosions and consequent harm to people, property, air, and water quality as well as untold emissions and climate impacts. These must be assessed now.

www.wpxi.com/news/top-stories/what-we-know-about-the-company-who-runs-gas-line-that-exploded/830991300: "...According to the Federal Office of Pipeline Safety, since 2006, the company has had 41 incidents resulting in more than \$11 million in property damages...And since 2006, Target 11 found three enforcement actions against the company listed on the federal website, the most serious in December of 2016 resulted in a \$24,000 fine. The Office of Pipeline Safety said the company did not provide records to demonstrate that their patrol pilot was qualified at the time he conducted 13 patrols by air on the pipeline right-of-way and seven months earlier in May 2016, the company was warned for failing to accurately notify the feds about the construction of 10 or more miles of a new hazardous liquid pipeline in west Texas."

<http://www.post-gazette.com/local/west/2018/09/10/gas-explosion-in-center-township-Beaver-County/stories/201809100067>: Excerpts:

An explosion in a gas pipeline shook parts of Beaver County early Monday, destroying a house, garages and several vehicles and possibly bringing down six high-tension electric towers.

Emergency crews responded to the explosion of the 24-inch methane line shortly after it was reported at 4:54 a.m. near Ivy Lane in Center Township, according to Center police Chief Barry Kramer and county emergency officials.

"It lit this whole valley up," Chief Kramer said. "People looked out their window and thought the sun was up."

...A spokeswoman for Energy Transfer Corp. said that while an investigation is underway, officials believe a landslide may have ruptured the line.

Sam and Joyce Rosati and their 10-year-old niece managed to get out of their house on Ivy Lane just as the gas exploded and destroyed their home, said a next-door neighbor, Tom Demarco.

Tom Demarco said he has lived on Ivy Lane in Center Township since 1989. Mr. Demarco said the massive fire that resulted from Monday's gas explosion was "fiercer than fierce, raging. My house started shaking. The sky was pure red from the flames shooting."

(Darrell Sapp/Post-Gazette)

"They lost everything," he said, adding that a barn on the Rosati property also was destroyed. He wasn't sure if

horses usually kept in the barn made it out safely.

Mr. Demarco, who has lived on Ivy Lane since 1989, said the fire the explosion caused was "fiercer than fierce, raging."

"My house started shaking. The sky was pure red from the flames shooting."

Chuck Belczyk awoke "from a dead sleep" when the explosion occurred. He lives about 200 yards from the pipeline.

"It was bright. I heard massive hissing," Mr. Belczyk said. "My first thought was that it was an airplane crash."

Karen Gdula, who lives across the street from Mr. Belczyk, said, "I felt the earth shake."

In what officials said was "probably" related to the blast, six high-voltage towers were knocked down in the area of Bunker Hill Road, which runs alongside Interstate 376. As a precaution, authorities initially closed one lane of the highway before PennDOT shut down the entire thoroughfare in both directions shortly after 7 a.m. The highway reopened by noon.

"We had a lot of voltage on the ground," Chief Kramer said, although no injuries were reported from the downed lines. About 1,500 were without power in the Center area.

...Chief Kramer said emergency officials decided to let the fire burn out. By 7 a.m., it had extinguished itself.

...The company said residents whose property was damaged should call 1-800-445-5846.

...The Revolution pipeline had been in the commissioning phase - a kind of dress rehearsal -- since Sept. 3, according to Ms. Granado. It wasn't yet operating commercially, but gas was running through the pipe during the trial period, just as it would during normal operations, she said.

Ms. Granado didn't know how much pressure was in the line before it burst; it is designed to operate at a maximum pressure of 1,440 pounds per square inch.

Recent rain has ETC and its regulators focused on erosion control, Ms. Granado said, when asked about past landslides. "It's something definitely that is being actively managed."

The Beaver County Conservation District was responsible for the pipeline's environmental permitting and for inspecting whether ETC's construction had proper erosion and sedimentation controls.

Jim Shaner, executive director of the Beaver County agency, said the controls were installed as designed "but they were not working."

There were a number of landslides on steep hills, he said, because of the "degree of the slope and the amount of rain" that has soaked the region over the past year.

Most were minor, according to Mr. Shaner, but one was big enough to dump debris into Raccoon Creek. After state Department of Environmental Protection officials surveyed the damage, they issued a series of violations to ETC and, in June, came to a settlement that will require the company to monitor restoration of the creek for five years. It includes a \$145,250 fine for violations.

Mr. Shaner said the conservation district's duty as the environmental permitting agency is to ensure that

construction activities don't pollute streams or wetlands. The agency does not evaluate the pipeline design for safety.

A landslide was found to be the cause of an explosion in a new natural gas pipeline in West Virginia. TransCanada's Leach XPress burst into flames in June, six months after it was put into service. The segment that ruptured was at the bottom of a steep hill.

Energy Transfer announced its plans for the Revolution project in 2015. The pipeline was fashioned to pick up gas from Butler County and deliver it through gas gathering and natural gas liquids pipelines to ETC's Revolution cryogenic plant in Washington County.

There, natural gas liquids would be taken out of the gas stream and further separated into ethane and other hydrocarbons. From there, the liquids would travel to the Philadelphia area through Mariner East 2 while the gas would head to Ohio through another ETC pipeline, Rover.

The company said in a presentation in May that the Revolution pipeline was "mechanically complete" but was waiting for Rover and Mariner East 2 to come online before it was put into service. But ETC also said it was evaluating some interim uses for the pipeline before the other projects caught up.

Energy Transfer's reputation in Pennsylvania over the past few years has been dominated by its Mariner East 2 project, which involves laying a pair of pipelines across the southern part of the state to ferry natural gas liquids from Ohio to refineries and export terminals near Philadelphia. The effort has yielded dozens of environmental violations, drilling mud spills into creeks and streams, and a series of construction stops ordered by regulators that have delayed the pipelines' in-service dates. (First Published September 10, 2018, 5:35am)

The risks and economic costs illustrated by this example must be assessed, since they are likely occurrences that will result from Wayne leasing for fracking, which is making both Wayne minerals and adjacent landowners' minerals available for extraction that would not otherwise be extracted or transported. The high costs of the USFS decision to consent to the BLM to lease have never been accounted for and must be during this assessment process as a problem with past and current Wayne decision-making and activities.

Sincerely,

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on behalf of Athens County Fracking Action Network,

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Buckeye Environmental Network (formerly Buckeye Forest Council), Roxanne Groff, board chair

Jean Andrews, Documentary Video Producer, "A Forest Returns: The Success Story of Ohio's Only National Forest as Told by Ora Anderson"

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Meghan Wynne, Organizer