

Data Submitted (UTC 11): 2/19/2023 5:00:00 AM

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Comments: To: United States Forest Service, US Department of Agriculture

From: Michael Schenk

re: Mountain Valley Pipeline and Equitrans Expansion Project Supplemental EIS #50036

As an experienced weldor-fitter with ASME pressure vessel certification, I request that the US Forest Service deny the Mountain Valley Pipeline's application to cross the Jefferson National Forest. The USFS must select Alternative 1: No Action.

Pipe welding can be challenging under good conditions, but it's exceptionally hard in remote, rugged terrain under extreme outdoor conditions. I have not found any quality assurance/quality control documents which detail the steps taken by the MVP to prevent poor joints which leak. This is exceptionally critical for a complex, remote job with little oversight and in which the welded product is buried and out of sight. The fact that the MVP does not add odor to the odorless methane they are pumping makes this exceedingly dangerous: any leaked methane will be hard to detect and trace. This may save maintenance costs but it is a hazard to the public. Methane is heavier than air. It can collect in pockets and present an explosion hazard. Leaks from the MVP will greatly increase the risk of forest fires.

Typical pipelines are mainly long straight segments where most joints are uncomplicated and repetitive. The MVP follows a heavily meandering path with frequent vertical and lateral changes of direction which require many more complex joints. There are very few straight segments. The MVP is an atypical pipeline. Its design and worksite conditions present difficulty to expert weldors.

Steep terrain has risks of soil movement and landslides, especially since the area of Peters Mountain is seismically active. This adds to the risks of any poorly-welded joints, and even to well-made joints experiencing excess stress.

An observer reports rusty pipes in the ROW with peeling, flaking coating. This leads me to deeply question the QA/QC on this job. Each welded joint should be x-rayed, and the x-rays should be archived in a secure and accessible location where the public can inspect them.

The DSEIS is incomplete in that it did not require pipeline integrity QA/QC, with records accessible to the public, and it did not require post-construction field surveys with instruments capable of detecting the odorless methane intended to be carried by the MVP. Forest fires due to methane leaks are severe environmental impacts. Fires have resulted from fracked-gas pipelines in Pennsylvania.

"Natural gas investigations in PA lead to record fine, closed pipelines"

https://www.bayjournal.com/news/pollution/natural-gas-investigations-in-pa-lead-to-record-fine-closed-pipelines/article_551ef3fa-ac68-11eb-acd6-2b035028a604.html , accessed February 19, 2023

This pipeline must not be pressurized. The USFS must exercise Alternative 1: No Action.