

Docket #PF15-6 Proposed Atlantic Coast Pipeline

My name is Diane Korte, I live in Churchville Virginia. As a former land use planner, with a degree in environmental studies and geology, I was shocked by the proposed pipeline route; first because of its disregard for the contours and geology of the terrain it crosses and second because of its disregard for our sensitive and valuable manmade communities. Even if this pipeline could meet the engineering thresholds for safety it would be a disastrously poor plan.

The assessment should be strong on alternatives to all of the proposed routes because of the hydrogeology of Augusta County. The scientifically proven regional karst formation makes this area uniquely fragile, unpredictable and hazardous for pipeline construction and maintenance. Engineering practices and other mitigation measures cannot adequately lower the hazard of leaks and failure of the pipeline. In addition, the karst hydrogeology makes the headwater aquifer underlying Augusta County uniquely vulnerable to irreparable impacts during both construction and the life of the pipeline.

Tonight, I ask FERC on what historical and factual basis you have approved other pipelines through karst in other states. We have asked Dominion to give us specific examples to calm our fears about pipeline safety in karst and they have not responded. After investigating historic data bases of the Pipeline and Hazardous Materials Safety Administration (PHMSA), **I have to wonder, how can any of you offer assurances?**

My research has revealed that **PHMSA and our Virginia Pipeline Safety inspectors have no geologists or karst experts of any type working for them as part of the post construction**

inspection teams or those responding to incidents. When a pipeline is exposed by a wash out, an engineer following federal guidelines (that do not address sinkholes and karst specifically) comes out and uses performance based engineering standards to evaluate. So there is **NO evaluation of whether this exposed pipeline is caused by a forming sinkhole. Natural-hazard-caused pipeline failures are categorized by the analysis of the metallurgic lab, not earth scientists.**

In contrast, the VDOT Staunton District office has a full time geologist on staff because they know how hard it is to maintain infrastructure in karst topography. Despite their constant vigilance and care, they still experience huge sinkholes opening up under roadways.

Environmental assessments require analysis of long term impacts. How can you agree that this geologic hazard can be mitigated if you know that **the federal agency responsible for ensuring the safety of the pipeline after your approval does not have the mandate or professional staff to deal with something as volatile and requiring immediate response like karst?** I question FERC's ability to determine that their environmental mitigation and engineering practices can produce a relatively safe pipeline in sinkhole laden karst topography.

Thank you for your assistance with my inquiry.

Sincerely:

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