

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street NE
Washington, DC 20426

Re: Comments on the draft environmental impact statement for the Atlantic Coast Pipeline

Docket Number CP 15-554-000, CP15-554-001

April 6, 2017

Ms. Bose:

As I stated in my comments of April 4, 2017 the draft environmental impact statement for the Atlantic Coast Pipeline must be retracted and rewritten.

These comments clarify a section of those April 4th comments, Sinking Streams Adjacent To Proposed Pipeline On Limpert Property.

See figure 2, attached. This is a map of the current proposed route of the ACP through our property, parcels 14-18C and 14-18E. The map documents water resources that would be at significant risk should the pipeline be constructed in this location. The base for this map is a photocopy of the maps we received from Doyle Land Services in their offer to purchase a right of way through our property. We will not sell an easement to the ACP for any amount of money, and the ACP will have to take us to court to seize our property through eminent domain.

The map shows the route of the proposed pipeline on Miracle Ridge. It shows the locations of the two streams on either side of the proposed pipeline, and locations where we have documented the stream-flow sinking into the ground. It also shows 8 springs in proximity to the proposed pipeline that we have documented, including the spring on our property that is used by our neighbors Drs. Victor and Lora Baum for their water supply, and is our backup water supply as well, and the two springs at the head of the two streams that run in proximity, and generally parallel to the proposed path of the pipeline. The line carrying water from the water supply spring would be crossed by the pipeline on the Baum property, and it is not shown on this map. The location of our home and well are shown, as well as the locations of several photographs documenting the sinking streams which are included in these comments.

These photographs include:

Photos 259, 261, and 264 taken on 3/4/17, showing the stream at the toe of the north slope of Miracle Ridge sinking about 350 feet north of the border between parcels 14-18C, and 14-18E.

Photo 273 taken on 3/24/17 showing the stream in Cathedral Hollow sinking in a small pool about 400 feet above the property line between our parcel 14-18C, and the Baum property, parcel 14-18D.

I have documented these, and the other depicted sinking locations in numerous additional photographs which are not included in these current comments.

The map does not show elevation contours. Nevertheless, the entire area is very steep, particularly the slope and sideslopes of Miracle Ridge as I have documented in earlier comments. Miracle Ridge is also very narrow. The route of the proposed pipeline rises about 1,000 feet in elevation through our property. The general slope of the land is from south to north, with both streams running generally north. The locations of the sinks, springs, home, and well are approximate.

The route would pass through about 3,050 feet of our property, and almost all of that would be on Miracle Ridge. Miracle Ridge and the pipeline route are bordered on each side by hollows. On the northeast side a stream runs along the toe of the very steep side slope coming off Miracle Ridge. This slope stops abruptly at the stream. This side slope averages 66% throughout the property with a steepest section at 78%. On the southeast side of Miracle Ridge is Cathedral Hollow. This side slope of Miracle Ridge averages 39% with a steepest section of 58% above Cathedral Hollow, and it extends for hundreds of feet steeply to the stream in Cathedral Hollow. Cathedral Hollow is deeper than the hollow to the north of Miracle Ridge. The sinking streams indicate that karst terrain exists well up into these hollows along the path of the proposed pipeline.

As I have documented in my comments of April 4, 2017 and earlier, an extreme amount of excavation, including excavation through bedrock, would be required to place the pipeline on Miracle Ridge, or elsewhere on our property, for that matter. It is likely that large amounts of blasting would be required through 20 to 25 feet of bedrock. Due to the shallow bedrock, minimal soil, and the fact that only soil can be used to fill the 30 foot wide trench (per DEIS comments regarding trench width on steep slopes and pipeline construction) it would be very difficult to revegetate the disturbed areas. In fact, there may be no soil remaining after backfilling the trench to spread over the remainder of the disturbed area. See my comments from April 4, 2017.

The extreme amount of excavation and placement of fill on very steep slopes could cause landslides as the DEIS indicates. In fact, large natural landslides have occurred within several hundred feet of the proposed pipeline in Little Valley, and on our property in the summer of 2015. Besides the obvious safety issues regarding landslides, a landslide could send large amounts of soil and rock directly into the streams on both sides of Miracle Ridge. Additionally, even without a possible landslide, soil loss to these streams would be inevitable given the very large amount of excavation, the very steep slopes, and the absence of truly effective erosion and sediment controls. Furthermore, the ACP's failure to provide detailed grading plans and detailed erosion and sediment control plans, and FERC's complicity in not requiring those plans, exacerbates an already unacceptable risk of landslides, resultant catastrophic pipe failure, and very heavy sediment pollution.

Additionally, the extensive blasting required to install the pipeline on Miracle Ridge could easily fracture and collapse the limestone underground water carrying channels and the sinking locations in the adjacent waterways, and significantly alter underground flows to wells and springs, including the Baum water supply, the Keyser well, our well, and many other springs and wells in Little Valley. As I have stated, there is no public water within 15 miles of Little Valley. All of us use wells and springs.

No karst or geohazard on site survey has been completed on our property or in Little Valley to date, and only the ACP is responsible for that failure. We have never denied survey access to our property. In fact, in April of 2016 we, and our neighbors agreed to allow surveying, and all of us took time away from other issues to meet the surveyors. They never showed up. They stated that they would call in advance to confirm the survey. They didn't call. We were forced to call them the afternoon before the survey. They could not advise at that time if they would come, so we waited for their return call, and they called back later that day to say they were canceling the survey. They stated they would be back in several weeks, but didn't come back until November, 2016 for our neighbors surveys, and January 18, 2017 for our survey, and these surveys did not include karst or geohazard surveys which are still pending for later this year.

The ACP has failed to provide my wife and I with their survey findings of January 18, 2017 as demanded in two letters, both filed with the Commission. As I have stated, Eric Donajkowski of the survey crew observed the sinking stream at the northeast side of Miracle Ridge during that survey, and agreed that it was sinking while my wife and I were pointing it out to him. I once again demand these survey findings.

The ACP survey crews have only marked 3 of the 8 springs shown on Figure 2. The marked springs include the Baum water supply spring, the spring at the head of the stream north of Miracle Ridge, and one of the springs in an area of springs near the same stream. During the survey I pointed out another spring in this area to Mr. Donajkowski, but he did not mark it.

I would also like to mention, once again, the ACP underreporting of springs in proximity to the pipeline. There are 8 springs shown on this map, all on 120 acres of our property. The DEIS lists only 3 other springs outside of Little Valley in all of Bath County, and a number of counties list no springs whatsoever. This underreporting is unacceptable, and FERC should require an accurate assessment of all springs and wells in proximity to the pipeline.

The map also points out another serious safety issue regarding the pipeline that has heretofore not been discussed. This is the fact that the pipe will be bent in the field, on site, and not in a controlled factory setting, to accommodate changes in the direction of the pipe. In the approximate 3,050 feet through the very steep Limpert property, where the pipeline would gain about 1,000 of elevation, the pipe changes direction, and will be bent on 8 separate locations. This would be done under very difficult conditions, with very steep slopes, and in adverse weather conditions, including possible work in the winter. This would make safe pipe construction even more difficult. Any bending of the pipe creates a more vulnerable location along the wall of the pipe for breakage, fracture, and weakness. Given the potential for land movement and landslides, and the revelation that the pipe will contain foreign steel, this additional safety concern becomes even more grave. This is not placement of a straight 42 inch gas pipeline through the plains of Kansas. This is placement through the steep landslide prone slopes, and karst terrain of Western Virginia and West Virginia, where numerous changes of direction are required, and the pipe is bent in many locations.

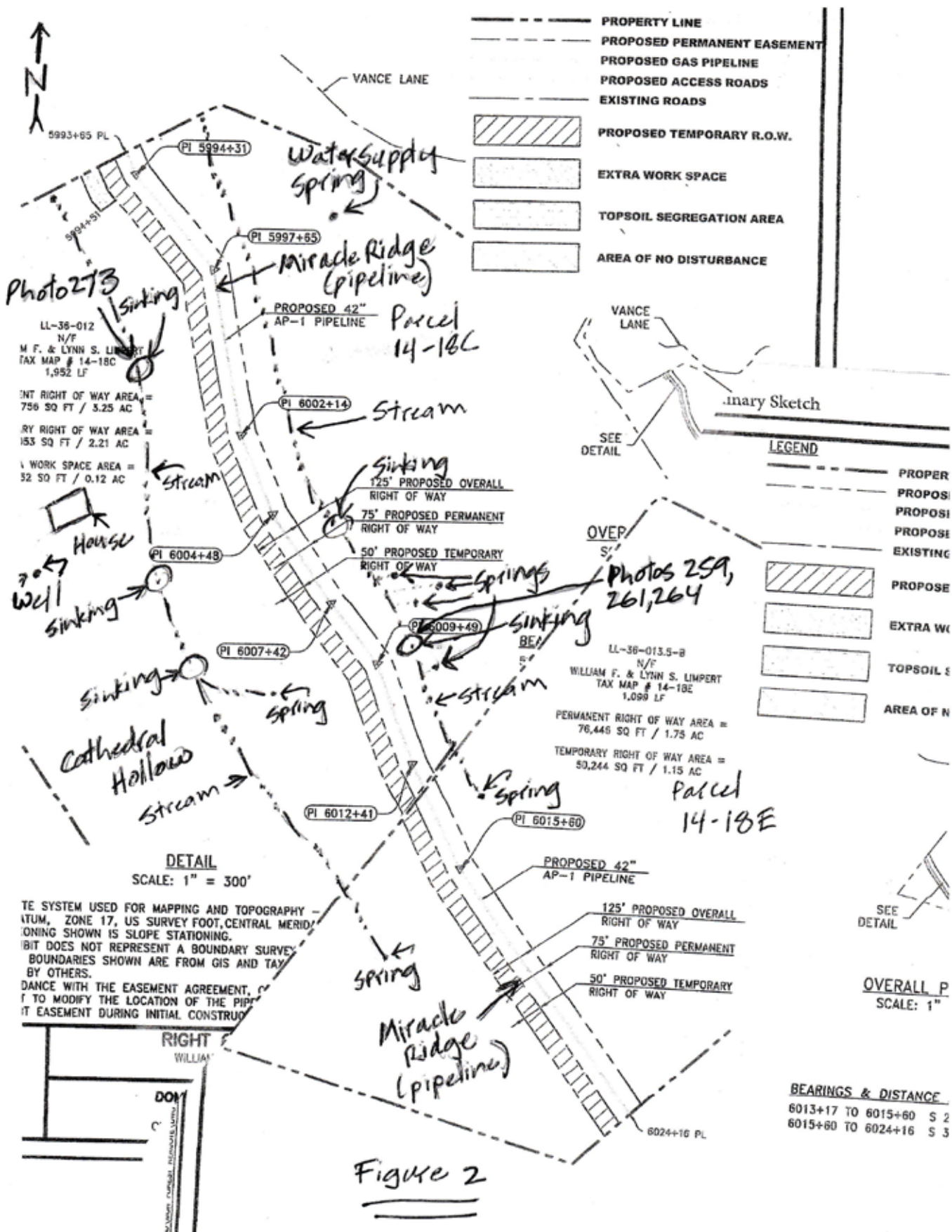
In summary, water resources on the Limpert property and in Little Valley would be gravely threatened by placement of the ACP along Miracle Ridge or other similar topography on the Limpert property. The serious threat to drinking water is a fundamental public health issue. Other matters, including failure to survey for karst and geohazards, underreporting of wells and springs in proximity to the proposed pipeline, failure to provide survey findings, and very serious pipeline public safety issues are exposed as well as as significant negative impacts that are not discussed adequately in the DEIS.

The DEIS dismisses all of these very serious issues as less than significant. This conclusion is grossly incorrect. The DEIS must be retracted and rewritten to satisfactorily assess the impacts from this proposed project. The ACP should not be constructed on the Limpert property, Little Valley, or the steep and karst terrain of Western Virginia and West Virginia.

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LL-36-012
 N/F
 M F. & LYNN S. LIMPERT
 TAX MAP # 14-18C
 1,952 LF

INT RIGHT OF WAY AREA =
 756 SQ FT / 3.25 AC
 PERMANENT RIGHT OF WAY AREA =
 153 SQ FT / 2.21 AC
 EXTRA WORK SPACE AREA =
 32 SQ FT / 0.12 AC

LL-36-013.5-B
 N/F
 WILLIAM F. & LYNN S. LIMPERT
 TAX MAP # 14-18E
 1,099 LF

PERMANENT RIGHT OF WAY AREA =
 76,448 SQ FT / 1.75 AC
 TEMPORARY RIGHT OF WAY AREA =
 50,244 SQ FT / 1.15 AC

THE SYSTEM USED FOR MAPPING AND TOPOGRAPHY IS
 NAD 83, ZONE 17, US SURVEY FOOT, CENTRAL MERIDIAN.
 STATIONING SHOWN IS SLOPE STATIONING.
 THIS MAP DOES NOT REPRESENT A BOUNDARY SURVEY.
 BOUNDARIES SHOWN ARE FROM GIS AND TAX MAPS
 BY OTHERS.
 IN ACCORDANCE WITH THE EASEMENT AGREEMENT,
 THE ENGINEER HAS THE AUTHORITY TO MODIFY THE LOCATION OF THE PIPELINE
 IF NECESSARY DURING INITIAL CONSTRUCTION.

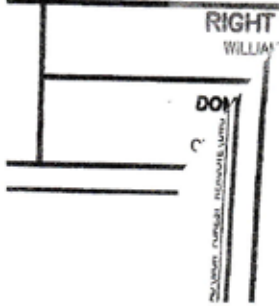


Figure 2



Photo 259

Photo 264



Photo 261



Photo 273