April 14, 2021

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

RE: Project Docket Numbers CP15-554-009 and/or CP15-555-007

The Honorable Secretary Bose:

We are writing in opposition to the closeout plan Dominion Energy and its partners have proposed in abandoning the now-cancelled Atlantic Coast Pipeline. Our opposition is outlined but not limited to these reasons:

1. The gas pipeline was purported to bring needed jobs and an economic benefit to an economically deprived part of North Carolina. The project cancellation ends any economic benefit possibilities.

2. The Project used the power of eminent domain as leverage to force an easement agreement. A release of all easements is respectfully requested.

3. Future economically beneficial development possibilities for lands in Northampton and/or Halifax County, North Carolina are legally and physically encumbered by miles of buried 36 inch diameter heavy steel pipe. Removal of all pipe is respectfully requested.

Given the untenable situation of balancing possibilities of economic benefit for distressed communities and the threat of eminent domain, we and other neighbors felt compelled to reach an agreement with the Atlantic Coast Pipeline for right of ways through our family lands. The power of eminent domain was granted to the Atlantic Coast Pipeline with the issuance of the Certificate of Public Convenience and Necessity. Under this threat of eminent domain, landowners were faced with minimal choices regarding their own properties. Since the Federal Energy Regulatory Commission (FERC) authorized this process, we respectfully request that the Commission take part in helping rectify the subsequent consequences by ensuring our community and its lands are restored to their previous condition.

When the various easements were signed, our native woodlands and open fields in the area were in their natural state of topography. In Northampton and Halifax Counties of North Carolina, we currently have an unsightly mess. The now-abandoned Atlantic Coast Pipeline project right of ways have intrusively cut through our lands and farms. The underground pipe is deteriorating from the elements due to its lack of cathodic and/or any other protections and posing a future safety hazard to heavy farming equipment from soil subsidence when the metal eventually deteriorates and collapses. The pipe abandoned on the surface of some properties is also deteriorating from exposure to the elements. This is creating potential safety, environmental and soil contamination issues.

It is imperative that all buried pipe be removed due to the land use restrictions and the diminution in value to the affected properties. Robinson Farms, LLC specifically received notice
in May of 2019 from the Northampton County, North Carolina Tax Department informing us of a decrease in our assessed property valuation due to the presence of the buried pipeline. This is evidence of the negative impact on property values as well as county income. Geographically, the Robinson Farms, LLC parcel is long and narrow as you can see in the Right of Way Easement plat (Exhibit A and Exhibit B). The pipeline runs through the center of the ENTIRE property limiting its productivity and value as long as the pipeline is left in place. Our family has owned this property for over four generations and have been responsible stewards of the land while paying all required taxes over the years to various levels of government. We simply request that the government demonstrate the same temperament of stewardship by ensuring the removal of the abandoned pipeline by Dominion Energy and its partners. Our land and the lands of our neighbors along the pipeline route are bisected with a very heavy, large diameter welded steel pipe which will place an undue burden on landowners in the future. Specifically, we believe the abandoned pipe should be removed at the time of reclamation since the type of heavy equipment required to remove the buried pipe will already be on-site during the reclamation process.

The unreleased easements and abandoned underground pipe present an impediment to any property sale, transfer or future development. From a future development standpoint, housing needs in the area are constantly evolving. Abandoning the pipe in place as planned would present ongoing challenges should anyone need to install a septic system, drill a water well, pour concrete foundations, etc. The large, heavy, corroding, and decaying pipe in the ground will impede a variety of future community needs over many decades to come. As FERC contemplates a decision on this matter, please keep in mind that we did not ask for or seek out this invasion of our property or time, but in good faith made an effort to collaborate and act upon the Atlantic Coast Pipeline’s initial request. All that we are asking in return is for our properties to be restored as closely as possible to their original state.

Given the cancellation of the Atlantic Coast Pipeline, we believe the following should occur:

1. Removal of the pipe buried in the ground;
2. Removal of the pipe that is lying on the surface areas;
3. Restoration of the land as closely as possible to its prior topography;
4. Full release of the collective easement agreements for this project at an appropriate time.

Sincerely,

Mary Strickler, Manager
Robinson Farms, LLC

cc: Dan O’Brien, Authorized Representative
Atlantic Coast Pipeline, LLC
707 East Cary Street
Richmond, Virginia 23219
BEARINGS & DISTANCE ALONG PIPELINE:

- 272°00'00" TO 272°12'11" S 118°00'00" W = 642'
- 272°12'11" TO 272°48'52" S 119°00'00" W = 2768'

This map is not a certified survey and has not been reviewed by a local government agency for compliance with any applicable land development regulations.

NOTES:
1. Coordinate system used for mapping and topography - UTM with North American Datum Zone 17, US Survey Foot, Central Meridian 90° W
2. All existing features are shown in black measuring.
3. This exhibit does not represent a boundary survey and is not intended for legal recognition. For informational purposes only (per T1 Section 26,1162-1-CA03).
4. Property boundaries shown are from GIS and are recorded by official survey. In accordance with the exhibit agreement, parties shall have the right to modify the location of the pipeline within the permanent easement during rental construction.
5. Field survey and mapping completed by GAI Consultants-NC, Inc.

SCALE: 1" = 2000'

LEGEND
- PROPERTY LINE
- PERMANENT PIPELINE
- PROPOSED GAS PIPELINE
- PROPOSED ACCESS ROAD
- PROPOSED TEMPORARY R.O.W.

EXTRA WORK SPACE

TOPSOIL SEGREGATION AREA

SCALE: 1" = 400'

RIGHT OF WAY EXHIBIT

ROBINSON FARMS LLC
NORTHAMPTON COUNTY, NORTH CAROLINA

ATLANTIC COAST PIPELINE, LLC
G/O DOUGHERTY TRACTORS, INC.
446 W. MAIN STREET
CLARKSVILLE, WEST VIRGINIA 26301

DRAWING NO: LL-16-017-A001-A

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