

UNITED STATES OF AMERICA  
BEFORE THE FEDERAL ENERGY REGULATORY COMMISSION

In the matter of Sabal Trail Transmission, LLC Sabal Trail Project Docket No. CP15-17-000
--

December 24, 2014

**MOTION TO INTERVENE**

Pursuant to 18 CFR § 385.214, the Blue Ridge Environmental Defense League (‘‘League’’ or ‘‘BREDL’’) hereby files a motion to intervene in the above captioned proceeding. Under 18 CFR § 157.10, BREDL seeks a formal hearing on the application. This motion is timely filed in accord with the Federal Register Notice,<sup>1</sup> Rule 210 and Rule 2009.

Background

On November 21, 2014, Sabal Trail Transmission, LLC (‘‘Sabal Trail’’) filed an application under section 7(c) of the Natural Gas Act, requesting authorization to construct, own, and operate a new natural gas pipeline system (‘‘Project’’), including five compressor stations and appurtenances totaling 209,900 horsepower, across Alabama, Georgia, and Florida. If constructed, the Sabal Trail would have approximately 460 miles of 36-inch-diameter natural gas pipeline beginning in Tallapoosa County, Alabama and ending in Osceola County, Florida. Project owner Sabal Trail Transmission, LLC is a joint venture of Spectra Energy Corp and NextEra Energy, Inc.

Sabal Trail has also requested 1) a certificate of public convenience and necessity to acquire by lease from Transcontinental Gas Pipe Line Company the capacity that would be created by Transco’s proposed Hillabee Expansion Project, Docket No. CP15-16-000, 2) a blanket certificate pursuant to Part 157, Subpart F of the Commission’s regulations, authorizing

---

<sup>1</sup> 79 Fed. Reg. 73579, December 11, 2014

Sabal Trail to construct, operate, acquire and abandon certain facilities as described in Part 157, Subpart F, and 3) a blanket certificate pursuant to Part 284, Subpart G of the Commission's regulations, authorizing Sabal Trail to provide open-access firm and interruptible interstate natural gas transportation services on a self-implementing basis with pre-granted abandonment for such services.

To comply with the National Environmental Policy Act, the environmental impact statement for the Sabal Trail Project must include the Hillabee Expansion Project and Florida Southeast Connection's FSC Project (Docket No. CP14-554-000).

Position taken by BREDL and the basis in fact and law for that position.

For years the Blue Ridge Environmental Defense League has investigated, publicized and organized on the invasive and destructive method of natural gas extraction known as hydraulic fracturing or "fracking." Nationwide, the growth of fracking has been phenomenal, increasing by 259% in just four years to over ten trillion cubic feet of natural gas per year.<sup>2</sup> Altogether, over 29 trillion cubic feet of gas is extracted annually from all sources in the US, including coal beds, oil wells and traditional gas wells.

Once the gas is extracted from the earth, it is transported in trucks, compressed and delivered by pipelines. At each stage in this process, pollution is created. Compressor stations are major pollution sources. The Sabal Trail proposal includes five compressor stations along its proposed route, including one in Lowndes County, Georgia, where BREDL has an active chapter. Compressor stations spaced 50 to 100 miles along the pipeline keep the gas moving from source to end use. Power for these compressors is provided by internal combustion engines which use natural gas as a fuel source. A typical compressor may release thousands of tons of

---

<sup>2</sup> US Energy Information Administration's 2012 Annual Report available at [www.eia.gov](http://www.eia.gov)

air pollution annually including nitrogen oxides, volatile organic compounds, carbon monoxide, particulate matter, benzene and formaldehyde.<sup>3</sup>

The negative effects of airborne formaldehyde occur at very low levels. Exposure to as little as 0.1 to 2 parts per million causes irritation of the eyes, nose and throat. At 5 to 10 ppm, people experience cough, tightness of the chest and eye damage. At 20 ppm breathing becomes difficult, at 30 ppm there is severe injury to the lungs. At 100 ppm, a concentration of just one one-hundredth of a percent (0.01%), formaldehyde is immediately dangerous to life. The National Institute for Occupational Safety and Health recommends an exposure limit of 0.016 ppm.<sup>4</sup> A single compressor station can emit tens of thousands of pounds of toxic formaldehyde into the atmosphere annually.

Stream crossings are one of the most significant impacts of pipeline construction. Small streams are diverted during construction. For many of the larger streams, pipeline crossings are done by excavation and blasting of the stream-bed.

Landowners suffer decreased property values caused by the restricted land use along easements in the 75 to 125 foot wide clear-cut, the standard in the construction of large interstate pipelines. Other economic impacts caused by the proximity of a gas pipeline include inability to sell, inability to get a mortgage and potential calling in of the mortgage because the owner allowed industrial development, a common stipulation in mortgage agreements.

Industry representatives tout natural gas as an environmental improvement and an economic advantage. But natural gas commerce is part of a global market, a factor which

---

<sup>3</sup> Information based on North Carolina Division of Air Quality Title V Operation Permit No. 10097T01 for the Piedmont Natural Gas Wadesboro Compressor Station. This permit is the subject of an extant petition brought by BREDL under Section 505 of the Clean Air Act.

<sup>4</sup> ATSDR Fact Sheet: Formaldehyde, CAS 50-00-0, June 1999

governments who gets the financial benefit and who gets the pollution. There was a 68% rise in US natural gas exports from 2008 to 2012 (from 0.9 to 1.6 trillion cubic feet).<sup>5</sup>

To further its proposal, Spectra Energy asserts:

This new pipeline infrastructure will also benefit the Southeast region of the United States by making available additional supplies and new energy infrastructure to support other regional power generators and the growing demand for clean-burning natural gas. The Sabal Trail underground pipeline will deliver affordable, clean natural gas supplies, while increasing the reliability of the region's energy delivery system and positively impacting the economy in the Southeast region of the United States.<sup>6</sup>

BREDL's position is that the purported benefits are not supported by the evidence.

Natural gas emits huge amounts of pollution and is not "clean-burning"; natural gas from the Sabal Trail project will not serve the residents of Alabama, Georgia and Florida nor will it benefit the region's energy reliability or the economy of the Southeast. Finally, BREDL believes that so-called energy independence via natural gas is a chimera "snorting out the breath of the terrible flame of bright fire."<sup>7</sup>

#### BREDL acts in the public interest

The Blue Ridge Environmental Defense League was founded in 1984 as a non-profit, independent non-governmental organization. The League is a 501(c)(3) corporation with members, chapters and projects in seven states: Virginia, North Carolina, South Carolina, Tennessee, Georgia, Alabama and Mississippi. The organization's mission is the protection of the natural environment and public health. As stated *supra*, the League has members and an

---

<sup>5</sup> Sources: BP Statistical Review of World Energy 2014, IEA Gas Medium Term Market Report 2013, accessed at <http://cdn.powermag.com>

<sup>6</sup> Spectra Energy website, accessed 23 December 2014 at <http://www.spectraenergy.com/Operations/New-Projects-and-Our-Process/New-Projects-in-US/Sabal-Trail-Transmission/>

<sup>7</sup> *Iliad*, Homer

active chapter situated on the pipeline route in Valdosta, Georgia: Wiregrass Activists for Clean Energy.

Conclusion

The Blue Ridge Environmental Defense League hereby requests that the Commission grant its motion to be admitted as an intervener in the extant proceeding and further requests that a formal hearing be held on the merits of the application.

Respectfully submitted,

A handwritten signature in black ink that reads "Louis A. Zeller". The signature is written in a cursive style and is followed by a horizontal line.

Louis A. Zeller, Executive Director  
PO Box 88 Glendale Springs, NC 28629  
(336) 982-2691  
[BREDL@skybest.com](mailto:BREDL@skybest.com)