Sue Homewood
401 Permitting
1617 Mail Service Center
Raleigh, NC 27699-1617

Re: Project No. 20250069 Version 1 – EGNC T-015 Reliability Project

The Southern Alliance for Clean Energy (SACE) is a nonprofit organization that promotes responsible and equitable energy choices to ensure clean, safe, and healthy communities throughout the Southeast. We have engaged in what little process has been available to assess the need and safety issues associated with the PSNC/Enbridge T15 Reliability Project, a large diameter, high pressure pipeline that is proposed to disrupt land and water bodies across Rockingham, Caswell, and Person Counties. Because it is an intrastate pipeline and is not subject to the National Environmental Policy Act (NEPA) under FERC, there is very little transparency, and it is therefore hard to speak about specific water impacts. There are not detailed alignment maps for the route – only vague maps showing a corridor with no indication of the pipeline's center line. Therefore our 401 comments must, because of the limitations imposed by the state process for intrastate pipelines, be more general in nature. Our concerns are as follows.

1. **The proposed pipeline's upland construction activities cannot be effectively mitigated enough to offset the impacts of increasingly torrential rainfall exacerbated by climate change.**

Upland activities at water crossings will *inevitably* damage the water bodies themselves – water bodies that belong to and serve the citizens of North Carolina. An example in South Carolina serves as a cautionary tale. In South Carolina in 2018, in an area with gentle slopes, erosion and runoff from upland clearing associated with the construction of Dominion Energy's FERC-approved 55-mile Transco to Charleston pipeline forced a water utility to shut off its intakes in the Tyger River after a heavy rainfall event.[1] The utility (Woodruff Roebuck Water District in Spartanburg County) was then forced to install an expensive filtration system in order to continue operating safely and reliably going forward. Photos documenting the immense failure of the erosion control devices are included in the Attachment. It must be noted that the slopes in this example are very similar to those in Rockingham, Caswell, and Person Counties. This real-world example demonstrates that it does not require steep mountain slopes for stream-burying sedimentation to occur.

The likelihood that *at least one BMP-overwhelming rain event* will occur during construction is significant. These rain events are fueled by climate change and are impacting North Carolina more and more frequently. We are all familiar with the damage of Hurricane Helene not even one year ago, and those of us in Orange, Durham and Person Counties have personal experience with Tropical Storm Chantal just a few weeks ago. Chantal caught the area, and even meteorologists, by surprise. The Eno River rose to a record 24.79 feet and inundated the Hillsborough wastewater treatment plant.[2] The impact of stormwater runoff on Hyco Lake, where Duke Energy's massive coal plant and planned massive gas plants (to be fueled by this pipeline) was nothing short of ironic. WRAL captured aerial footage of the floodwaters and the sediment plume in the lake.[3] Screen captures from this footage are in Attachment 2. The Assistant State Climatologist Corey Davis has stated "The pattern and the way (Chantal) approached us ought to be setting off the alarm bells."[4] Davis noted that North Carolina is seeing this type of storm behavior – with small cells dropping excessive rain – more often. The BMPs commonly used today are meaningless in torrential rain.

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[1] Source: https://www.greenvilleonline.com/story/news/2018/05/25/dominion-energy-under-scrutiny-after-mud-clogs-water-system-near-utilitys-sc-project/645320002/ (accessed July 9, 2024)
[2] Source: https://insideclimatenews.org/news/16072025/hillsborough-north-carolina-canceled-fema-program-chantal-damage/
[3] WRAL Hyco Lake footage: https://www.wral.com/sky-5-hyco-lake-flooding/22077688/
[4] Source: https://www.axios.com/local/raleigh/2025/07/07/tropical-storm-chantal-tropical-weather-triangle-north-carolina-carrboro-chapel-hill-durham

Rockingham, Caswell and Person Counties are in a particularly vulnerable geographic location for impacts from weather systems that are fueled by warm Gulf of Mexico waters and then move up the Atlantic Coast. These three counties are centrally located between the Appalachian Mountains and the Atlantic Ocean. Air patterns from these two often influence storm tracks from each side. To illustrate this, according to the National Oceanic and Atmospheric Association, 67 major storms (ranging from extratropical storms to hurricanes) have tracked across Person County (see screen capture of the NOAA tool below) in the past 150 years, whereas only 37 storms have tracked across Buncombe County.[5] These three counties are a target.

Source: https://oceanservice.noaa.gov/news/historical-hurricanes/

These counties are vulnerable to rain events that are so intense that there simply are no BMPs that can protect their waters. For this reason, we must protect them by keeping land disturbances far away from riparian areas. Significant and irreparable damage to aquatic habitat most assuredly will occur if this pipeline is approved and constructed, and this damage cannot be mitigated.

Slightly to the north, the FERC-approved Mountain Valley Pipeline (MVP) was cited by the Virginia Department of Environmental Quality for causing over 300 violations of erosion and sedimentation control. Both Virginia and West Virginia fined the operators of the MVP for erosion and sedimentation issues, with Virginia levying a $2.15 million penalty in a 2019 consent decree[6], the rules of which were broken, resulting in additional fines for 29 new construction violations totaling $34,000 as recently as this past spring.[7]

The point here is that these pipelines cannot be built in this age of torrential climate-change induced rainfall **without damage to our waters**. No BMP, no ECD is good enough.

2. **Enbridge has not been transparent with stakeholders, and this creates for a more dangerous and damaging project**

In a FERC-regulated pipeline docket, virtually all construction details are available for public scrutiny, and this makes for a much more thorough and robust process. For an *intra*state pipeline project, Enbridge is allowed to just say: trust us. North Carolina does not have sufficient staff to monitor construction. NC DEQ is cognizant of its own staffing, and the NC Utilities Commission has only five engineers to monitor safety issues during and after construction for all state-regulated gas transmission and distribution lines combined. North Carolina has 100 counties, so this equates to a responsibility of 20 counties per engineer. This seems like a dangerously low staffing level that presents an inherent safety risk. And while PSNC/Enbridge may attest to its adherence to standards, its actions speak louder. Other stakeholders will

[5] Source: https://oceanservice.noaa.gov/news/historical-hurricanes/

[6] Source: https://virginiamercury.com/briefs/mountain-valley-pipeline-agrees-to-pay-virginia-2-15-million-for-environmental-violations/ (accessed July 9, 2024)

[7] Source: https://www.wvtf.org/news/2024-03-28/virginia-fines-mvp-for-environmental-violations (accessed July 9, 2024)

likely speak to Enbridge's safety and compliance record, but our own experience with the company has engendered only skepticism and mistrust.

SACE frequently intervenes in FERC pipeline dockets, and so we were shocked at how little information PSNC/Enbridge made available for a project that will impact waters and parcel owners across three counties. The pipeline is even planned to pass very close to an elementary school – a high consequence area if there is a pipeline failure or explosion – but the company refused to answer any questions about this. SACE emailed PSNC/Enbridge with some questions about details that would have been readily available in a FERC docket. PSNC/Enbridge's response, received months after the query, are included as Attachment 3. The company essentially stated that all of the requested information was Critical Energy Infrastructure Information and therefore confidential. This evasiveness is very telling, and we caution NC DEQ that trusting this large, multi-national for-profit company is not in the best interest of North Carolinians.

Our summary is simple: Damage to our waters is guaranteed. There is no transparency in the process. There is no reason to trust that PSNC/Enbridge will adhere to the highest standards during construction. And North Carolina does not have the oversight staffing capacity to hold PSNC/Enbridge accountable. For these reasons, we strongly encourage the NC Department of Environmental Quality to deny this certification.

Sincerely,

s/s Shelley Robbins
Shelley Robbins
Senior Decarbonization Manager
Southern Alliance for Clean Energy
shelley@cleanenergy.org

Attachment 1 BMP Failure along Dominion's Transco to Charleston Pipeline in Spartanburg County, South Carolina, documented April 27, 2018

Photo by Shelley Robbins

Photo by Shelley Robbins

Photo by Shelley Robbins

Photo by Shelley Robbins

Attachment 2 – Stills from WRAL footage of Hyco Lake on July 7, 2025

Attachment 3 – Email response from Enbridge

(see following pages)

Shelley Robbins <shelley@cleanenergy.org>

T15 reliability project

T15ReliabilityProject@DominionEnergy.com <T15ReliabilityProject@dominionenergy.com> Mon, Dec 9, 2024 at 2:56 PM

To: "shelley@cleanenergy.org" <shelley@cleanenergy.org>

Shelley,
Good afternoon. Please see the following responses to your inquiry below.

What is the timeline for the T15 Reliability Project?

Construction is planned to begin as early as mid-2025 through 2027.

What will the Maximum Allowable Operating Pressure (MAOP) be of the new T15 pipeline? And what will the confirmed diameter be?

The pipeline's maximum allowable operating pressure (MAOP) is still being determined as we are still in the design phase. However, once in-service it will operate at transmission pressure. That said, energy facilities and pipelines are designated as CEII (Critical Energy Infrastructure Information). Accordingly, Enbridge Gas North Carolina does not share specific physical or operational attributes, such as operating pressure, with the general public. Public safety is Enbridge Gas North Carolina's top priority. All of our pipelines are designed to meet or exceed state and federal regulations and industry standards as we've done with the existing T15 pipeline, which has operated safely for decades.

Will Enbridge develop detailed alignment sheets that show construction depths and methodologies? Will those methodologies differ where the T15 route runs within the right-of-way of existing transmission lines (the last 8 miles)? If so, will these be made available for inspection by the public?

Various detailed alignment sheets will be developed to account for the different construction methodologies needed for various terrains, sensitive receptors and circumstances such as adjacent transmission lines. Construction and pipeline operation plans are not public. Be assured that Enbridge Gas North Carolina has engaged best-in-class experts to design the pipeline for safety and select the construction methods that best minimize impacts.

Can Enbridge comment on how they will construct a new, large diameter pipeline fully within the ROW of the existing T15 pipeline while maintaining a safe distance between the two pipelines? What is the planned distance between the two pipelines?

Additional permanent and temporary ROW will be used to safely build and operate both pipelines.

Will Enbridge assign Class Locations (1, 2, 3, and 4) along the route? If so, will this information be made public? Will Enbridge identify High Consequence Areas, such as Woodland Elementary School on Semora Road in Person County? If so, what measures will be taken in these areas, and will that information be made available to the public?

As Enbridge Gas North Carolina will build the new T15 pipeline predominantly adjacent to the existing right of way, the utility is familiar with HCAs/class locations in the area. Others will be identified as applicable. Enbridge Gas North Carolina is subject to third-party oversight regarding pipeline system integrity at the state (NCUC) and federal (PHMSA) levels. We meet all regulatory requirements. This includes monitoring the pipeline 24/7 from our system control center, working with first responders, conducting ground and aerial patrols, and following a rigorous inspection and testing schedule as part of our pipeline integrity management program. Our pipeline integrity management program as well as the HCAs along the pipeline is not public for the security reasons described earlier.

Has Enbridge begun the water and wetlands permitting process yet for the T15?

We expect to begin this process in the first quarter of next year.

Thank you,
T15 Reliability Project Team
DominionEnergy.com/T15