USA Definition Public Meeting
Webcast Submitted Questions and Comments
June 12, 2019

1. Will PHMSA map could affect areas, or will operators be responsible for that? When will PHMSA be enforcing use of new data? How are you figuring % of coastal area covered when area hasn't yet been defined?

2. Maps need to include areas to avoid. Unsuitable soils need to be avoided. How are you incorporating the Natural Resources Conservation Service Soil Survey? and PHMSA needs to require on the ground Order 1 Soil Surveys for pipeline routing, long before construction.

3. Will the 1 year to incorporate/5 years to be enforceable delays also apply to the new definitions for the Great Lakes once they are defined? So from the 2016 date of the mandate, it will be at least 4 years before the definition is finished and then an additional 5 years before operators are held accountable for using those in their identification of could affect areas?

4. The source information for the drinking water and ecological metadata is often a link to a general website such as a state DEQ. Is there a location that shows who or which agency to contact?

5. Thank you for this mapping tool and not all drinking water, and/or source water is recognized/mapped by our State. How does the Drinking Water map change the routing or construction of a pipeline? Does the highest integrity pipe, highest class pipe get used in the areas of Eco USA, or HCA? And then, ground-truthing and water-truthing, even ephemeral water-truthing needs to be performed. Ecological studies should not be performed by inexperienced or untrained personnel.

6. Thank you for this opportunity to mention again The Natural Resource Conservation Service Web Soil Survey as a source of established and GIS data usable for general mapping. The NRCS has mapped the soils associated with wetlands and it is the soils that show the limit of wetness.

7. Would you please comment on what class pipe is appropriate for integrity management in a High Consequence Area/Region in drinking water-quality source water, subsurface and surface water in Karst with unique and rare and endangered animals subsurface, in a confined upland valley with shrink-swell clay that becomes unstable when trenched? Unsuitable soils, problem prone soils. If not avoided, what class pipe would be appropriate for a 42-inch high-pressure natural gas pipeline through unstable karst and unsuitable problem prone soils?

8. Comment – our Pipeline member operators already understand the sensitivity of marine areas either inland or coastal or offshore, I don't think a lot of work needs to occur in that regard. Many employees of our member operators live in those USA areas and their right of way staff

work there. At CAMO we take proactive a proactive approach to close gaps in marine pipeline safety engagements and damage prevention. CAMO has over 5 environmental NGO partners who we are continually educating on marine pipelines and having a simple realistic definition we can relay to our all of our stakeholders will be strongly advised. The edges and interface of water and land is the most important to habitat and to protect pipelines from erosion subsidence etc. Again, I agree the simpler the definition the better, it will help us in our outreach as well.

9. If this whole conversation is about affecting water bodies, why are offshore pipelines not included in the HCA rules?

10. The issue of a regional No Build Zone for pipeline construction is appropriate for the natural undisturbed areas that ought to be avoided. Many of those undisturbed areas are in steep land in the Appalachian Mountains, and our National Forests.

11. Underwater or marine pipeline safety discussions are still underrepresented in many initiatives to advance the safety of mariners and the environment. I heard in this session that all stakeholders were being engaged, does this include marine excavators and stakeholders? In 2018 after a dredge hit a pipeline where lives were almost lost, the National Dredging Industry started a pipeline safety effort with PHMSA and CAMO. Although underwater pipeline incidents are far fewer than on land, they are 10 times more hazardous, 10 times harder to respond to, 10 times more impactful to the environment, 10 times harder to repair and the potential for injury is 10 times higher as the escape routes on a boat are limited. If not for the PHMSA TAG Grant program and CAMOs member operators and partners - marine damage prevention, safety and awareness would be non- existent. Please keep mariners in mind in your efforts. Many operators have pipelines underwater and don't realize it. So how can we get a bigger national focus on marine pipeline safety?

12. This discussion with PHMSA is new to me. And I would like to have you mention my comment about protecting soils that are not disturbed. That is reasonable that unstable soils be mentioned because more than 68% of the soils will fail in the Mountain Valley Pipeline Right-of-way, and that is just from the general Order 2 soil survey off the computer. That is avoidable and unacceptable. Those same soils produce fresh potable water.