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Guide for the Public: Safety Concerns for Williams Co./Transcontinental Gas Pipe Line Company, LLC's Proposed Southeast Supply Enhancement Project (SSEP)

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This document, prepared by the Pipeline Safety Trust (PST), serves as a guide for members of the public, organizations, and coalitions to seek more information about the project and to outline the concerns raised by the Trust during the Scoping phase of Federal Energy Regulatory Commission's Pre-filing process, which is an early stage of FERC's process to approve or deny a Certificate of Public Convenience and Necessity.¹

Who is Pipeline Safety Trust (PST)?

PST is a nonprofit watchdog organization of the pipeline industry and its regulators. We pursue our mission through education and advocacy, increasing access to information, and building partnerships with residents, safety advocates, government, and industry to promote safe communities and a healthy environment. Learn more at pstrust.org.

To read PST's full comment submitted to FERC including detailed references, please visit the PST website at pstrust.org.²

The proposed Southeast Supply Enhancement Project (SSEP) presents safety, environmental, and public health risks that are extremely concerning to the Pipeline Safety Trust, and we believe that the following information should be addressed by the company or FERC prior to the project's approval:

1. Potential Impact Radius (PIR) – *The distance where a potential failure of pipeline could have significant impact on people or property.*

PST has concerns with this calculation because of instances of death within a pipeline's PIR, demonstrating that the calculation is not conservative enough. For more details about issues with this calculation including a report from the National Transportation Safety Board, see our full comment. FERC should address these concerns with the PIR calculation.

2. Co-location – *Locating multiple pipelines within one right-of-way.*

The expansion project is proposed along an existing right-of-way that already contains 1-4 other pipelines of different types, including a high-pressure, large-diameter gas transmission line. FERC should ensure that the company's impact zone (PIR) calculation incorporates the effect of co-location to ensure

¹ For more information about FERC's process, visit <https://www.ferc.gov/industries-data/resources/process>

² To access the full comment, visit our website at pstrust.org and, search for "Transco SSEP" using the search bar at the bottom of the page to bring it up or type the following address into your browser: <https://pstrust.org/comment-to-ferc-on-environmental-scoping-for-transco-southeast-supply-enhancement-project-docket-no-pf24-2-000/>

a full picture of a possible failure's impacts can be studied and if needed, adjustments to the route can be made to ensure public safety.

3. Reversal of flow – *Adapting a pipeline to be able to flow in both directions.*

Flow reversal is known to contribute to pipeline integrity issues detailed in our full comment. Williams has included plans for the pipeline to have a reversible flow. What safety precautions is Williams taking to ensure integrity will not be an issue?

4. Geohazards – *Geologic and environmental hazards that can damage pipelines including earth movements, slope instability, flooding, erosion, and earthquakes.*

While an operator may not have control of geohazards like flooding or earthquakes occurring, it is PST's view that operators should be planning for and addressing them to maintain safe operations of their pipeline especially with threats from extreme weather and other climate change impacts on the rise. Based on the information provided in the pre-filing application, it is unclear to PST whether Williams has identified the relevant geohazards for this project and taken steps to manage these threats.

5. Pollution Impacts and Environmental Justice – *Pipeline activities can cause pollution that harms people and the environment, environmental justice includes the fair treatment and meaningful involvement of all people.*

PST hopes to see FERC analyze a "no-action alternative" for this project – meaning FERC would consider a scenario where the project is not completed – to ensure that the project's impacts do not outweigh the benefits. If the project is proven to be necessary, FERC should analyze any alternative routes that would decrease impacts to communities. In addition, this project includes two new gas-powered compressor stations which would contribute to new emissions and noise in the community and affect the climate. These impacts should be studied as part of the environmental review.

6. Williams Co.'s safety record – *Pipeline operators must report certain types of pipeline impacts, including failures that greatly impact people or the environment.*

PST analyzed publicly available records and found that the Transco system has more incidents than most pipelines.³ Even when adjusting for the length of Transco, Williams Co. is worse than other gas transmission operators in fatalities, cost per incident, and releases per incident. Further, most of the causes of Transco's incidents are what PST considers to be "direct," meaning the operator could have prevented the incident (e.g. equipment failure, material failure of pipe or weld, incorrect operation). FERC should consider this record when approving the project and use its power to create conditional approval to protect public safety.

For further information or technical assistance, please reach out to Virginia Wiltshire-Gordon at virginia@pstrust.org. More information will be available as the regulatory process progresses.

³ Records can be accessed via the Pipeline and Hazardous Materials Safety Administration (PHMSA)'s website under "Operator Information" at <https://www.phmsa.dot.gov/data-and-statistics/pipeline/data-and-statistics-overview>