

Chairwoman Gladys Brown Dutrieuille
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, Third Floor
Harrisburg, PA 17120
Citizen Comment on Proposed Rulemaking Regarding Hazardous Liquid Public Utility Safety Standards
(Docket L-2019-3010267)

Dear Chairwoman Brown Dutrieuille,

I appreciate the opportunity to share comments about pipeline safety. I became an advocate for pipeline safety on September 10, 2018, the day the 24-inch Energy Transfer pipeline exploded and destroyed the home located three properties from mine. I live on Ivy Lane, the site of the Revolution rupture that caused my neighborhood to evacuate. My life, and the lives of my neighbors, are forever changed.

In August 2019, a second pipeline was constructed on Ivy Lane by National Fuel. It is a 12-inch FERC (Federal Energy Regulatory Commission) pipeline that will supply natural gas to the Shell Cracker Plant in Beaver County.

Both pipelines cross a few hundred feet from the explosion site. The land is full of springs, streams and wetlands. The land is prone to slippage and landslides. The neighborhood lives in fear of another incident, potentially involving two pipelines this time.

Every home on Ivy Lane is within 1,000 feet of one or both pipelines. We all live within the Sacrifice Zone. We fear the day that gas flows through the two pipelines. We do not feel safe.

My neighbors, who lived in the destroyed house, understandably will not return. On September 10, they ran out the door with only the clothes on their back. As they ran up their driveway, they turned to see flames already on the roof of their home. They lost everything, including a dog and four cats.

I thank God my neighbors survived.

Please consider my comments on pipeline safety. Let's prevent another pipeline explosion from occurring in the Commonwealth of Pennsylvania.

Respectfully,

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II.A.2. Cover Over Buried Pipelines

The Revolution Pipeline, owned by Energy Transfer, is 3 feet deep. Earth movement due to heavy rains caused the pipeline to rupture on September 10, 2018 on Ivy Lane. The rupture occurred several hundred feet from the closest home. The occupants of that house ran out the door with only the clothes on their back. As they ran up their driveway, they turned and saw the flames already on the roof of their home. If they had hesitated, I do not believe they would be alive. They lost everything. Frequent and heavy rains are causing earth movements, slippage and landslides in Pennsylvania. According to the Pennsylvania Department of Environmental Protection's Inspection Reports, land is slipping at several other locations along the Revolution pipeline. Thirty-six inches of coverage is not sufficient, as demonstrated when the Revolution pipeline shifted due to earth movement and exploded on September 10. Coverage should be much deeper and at least six-feet deep for protection against earth movement, especially movement due to heavy rains.



09-10-18 The explosion site the day of the incident. The separated pipe is circled. The destroyed house and garage are smoldering in the upper right corner.

II.A.3. Underground Clearances

If a pipeline ruptures, 12-inches of underground clearance is not sufficient to protect another underground structure or another underground pipeline. The separation distance should be increased to be sufficient to protect the underground structure or other pipeline. This is of grave concern to the residents of Ivy Lane. The 24-inch Revolution pipeline owned by Energy Transfer crosses the 12-inch National Fuel pipeline a few hundred feet from the explosion site. The National Fuel pipeline will be on the bottom and the Energy Transfer pipeline will be above it. If the upper pipeline should rupture, what distance is far enough to protect the lower pipeline? Judging from photos I have seen of the ruptured Revolution pipeline (see photo above), I recommend the separation distance be 15 feet.

II.A.4. Valves

II.B.6. Emergency Flow Restricting Devices

The shutoff valves for the 24-inch Revolution pipeline are roughly 20 miles apart. The pipeline was not at maximum pressure at the time of the explosion and it took two hours for the gas to burn off after the valves were closed. The initial flames are estimated to be over 250 feet tall. The forest was rain soaked, which slowed the flames. The fire would have destroyed much more forest and probably many homes if it had not rained prior to the incident.

Because of the terrain in Pennsylvania, the Shell Falcon pipeline is placing the shutoff valves every 7 or 8 miles. This distance seems reasonable; the gas will take much less time to burn off, reducing destruction. It is recommended the shutoff valves be every 7 or 8 miles to protect the citizens and natural resources of the Commonwealth of Pennsylvania.



09-10-18 Our neighborhood, moments after the explosion. At 5:00 a.m. it looked like daylight. The explosion site is estimated to be 600 feet from the red-brick house in the first photo. The initial flames are estimated to be over 250 feet tall.

II.B.3. Pressure Testing and Maximum Operating Pressure

II.C.1. Utility interactions with local government officials, including but not limited to such topics as emergency planning and emergency response coordination, periodic drills with utility/municipal coordination.

II.C.2. Requiring periodic public awareness meetings with municipal officials and the public.

II.C.5. Enhancing transparency while protecting confidential infrastructure security information.

When the 24-inch Revolution pipeline, owned by Energy Transfer, exploded on September 10, 2018, it had only been operational for 7 days. It was not at maximum operating pressure at the time of the

explosion. Local officials, emergency responders and residents were not aware that the Revolution pipeline was operating. The neighbor who got through to the 911 Emergency Center had to convince them that a pipeline exploded, because the Emergency Center was unaware it was operational. Prior to pressure testing, it is imperative that notification be given to residents, emergency responders and local officials. Emergency planning and coordination should be in place at the county and municipal level. The public should be made aware, especially residents within 1,500 feet of a pipeline. I have spoken to countless individuals in my township who are unaware of their proximity to the Revolution pipeline. Residents need notified because structures, roadways, fields, hills and forests often obscure pipeline routes from view. Periodic public awareness meetings are a great idea.

II.B.4. Line Markers

Line Markers are a good idea if they are accessible. Residents of Ivy Lane asked Energy Transfer and National Fuel for contact information for emergencies. We were told to refer to the line markers. This will not work because the pipelines and line markers are in the forest on property we do not own. The residents of Ivy Lane will not walk through the forest to find the line markers, especially if there is a perceived problem with the pipeline. Residents, emergency responders and local officials should be given the contact information prior to operation of the pipeline.

II.C.4. Pennsylvania specific enhancements for operator qualification.

II.C.13. Background investigations of employees and contractors.

Vehicles need identification and side windows should not be darkened. Ivy Lane has a steady stream of truck and vehicle traffic every day since the explosion. Most are unmarked. Ivy Lane is a small residential street with a cul-de-sac at the end. Residents do not know if the vehicles are friend or foe. There are many children in the neighborhood and we look out for their safety. These unmarked vehicles are a concern because we have had non-residents who disrespected us and our property in an attempt to see the explosion site. Pipeline employees and contractors should have identification on vehicles so that residents know they have a legitimate reason to be in the neighborhood. Side windows should not be darkened so we can see the occupants.

II.C.9. Odorant utilization.

The 24-inch Revolution pipeline, owned by Energy Transfer, did not utilize an odorant. The neighborhood did not have an advance odorant warning when it exploded on September 10, 2018. We believe an odorant would have been the early warning that could have averted the explosion. Yes, utilize odorants in all pipelines.

II.C.12. Land agents and eminent domain (see 52 Pa.Code § 57.91).

> Safety Setbacks

National Fuel is a FERC pipeline with eminent domain authority. Residents in several Center Township neighborhoods had no recourse when they learned the 12-inch pipeline would be within 30 feet of their homes. It is wrong for land agents to bully home owners and force a pipeline into residential areas. Pipelines should be at least 1,000 feet from a home for the safety of the residents.



Zimmerman Drive, Aliquippa, PA. National Fuel cut down the tree in the front yard. The pipeline will be installed where the tree used to be, roughly 30 feet from the front door. Would you buy this house?



Herda Lane, Aliquippa, PA. National Fuel's pipeline will be to the left of the home. Would you feel safe?

II.C.14. Integration of new regulations on existing facilities.

Absolutely. Where feasible, existing pipelines should integrate new regulations, especially safety regulations for notifications of residents, local officials, emergency responders and coordinators.