



# Ohio Valley Environmental Coalition

*Supporting Organized Voices and Empowered Communities Since 1987*

P.O. 6753 Huntington, WV 25773-6753

304-522-0246 [info@ohvec.org](mailto:info@ohvec.org)

[ohvec.org](http://ohvec.org)

Ohio Environmental Protection Agency  
Attention: Permits Processing Unit  
P.O. Box 1049  
Columbus, Ohio 43216-1049

Re: Falcon Ethane Pipeline Clean Water Act Section 401 Water Quality Certification

## **To whom this may concern:**

Representing hundreds of members in multiple states, including Ohio and West Virginia, the Ohio Valley Environmental Coalition would like to state strong opposition to this project. In doing so, we join with and affirm the comments of our allies in the Ohio Sierra Club, FreshWater Accountability Project and other groups.

Rationale for opposition and denial of the permit are listed below:

- This pipeline would cross dangerously close to 550 family homes, 20 businesses, 240 groundwater wells, 12 public parks, 5 schools, 6 daycare centers
- The Falcon Pipeline is proposed to cross waterways known to be habitat for the endangered Hellbender Salamander; at one point the pipeline is proposed to be installed 10 yards from where juvenile Hellbender Salamanders were released in 2017.
- These large diameter pipelines have a history of leaking, as evidenced by Sunoco's Mariner East 2 pipeline and ETP Rover pipeline. Inadequate permitting processes and oversight, lack of adherence to permitted activities on the part of industry and inadequate geotechnical studies at proposed horizontal directional drilling sites (HDDs) can have a catastrophic effect on nearby groundwater wells, streams and wetlands.
- Major erosion, subsidence and sinkholes are a very real possibility in the construction zones of this pipeline, due to the nature of our topography.
- Should the gas pipeline explode at any point, multiple areas will be particularly at risk in the "blast zone" which is within 1,000 feet of either side of the pipeline. These includes the areas stated above: homes, businesses, groundwater wells, public parks, schools, daycares, major hiking and biking trails and the service line and high quality feeder streams
- Many critical species in our region are at risk, as illuminated by the following concerns:
  - Botanical species Purple Rocket and Climbing Fern are located in proximity to workspaces
  - One active Bald Eagle nest and two inactive nests in proximity to workspaces
  - Northern Long-eared Bat roost trees discovered as close as 318 feet from workspaces
  - Clusters of protected freshwater mussels, cold-water fish, and hellbenders in the path of the Falcon

**In addition, we have the following safety concerns re: cumulative development and compounded risks:**

- Twenty miles of the Falcon run through under-mined areas; 5.6 miles through active mines
- Eighteen miles of the Falcon run through surface-mined areas; also coal slurry waste site



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- The Falcon will, if built, share a right-of-way with Mariner West pipeline for four miles in Beaver County
- Eleven well pads, as well as a compressor station, are within the potential impact radius

We are alarmed at the size and capacity of this project, and believe it is dangerous and will have unforeseen, potentially catastrophic impacts on both the communities it traverses, and on our regional, national and global ecosystem. If completed, the 97-mile pipeline is designed to transport more than 107,000 barrels of highly flammable ethane per day across 22 townships in Ohio, West Virginia, and Pennsylvania. It will transport ethane separated out at a fracked gas processing plants in Pennsylvania and Ohio to an ethane processing facility in Beaver County, PA in order to produce plastic pellets for plastic products. If completed, the Falcon will be a key first component of the so-called Appalachian Storage Hub – which we have been researching for four years, and believe will bring far more detriments to our Ohio River Valley than benefits. These detriments include major water withdrawals and the risk of catastrophic water pollution which would endanger the tap water supply for five million people. We also know that the air emissions from this project and its associated second and third wave fracking will lead to an exponential increase in leaks and flaring of Methane – one of the most potent greenhouse gases, accelerating the already dangerous levels of carbon emissions into our atmosphere. We strongly encourage all permitting agents to consider the cumulative impact of this and other related projects.

**This is a private company's industrial product transport pipeline, not a pipeline to transport methane for home and local business energy supply. Therefore, such a permit should be carefully and equally weighed with the major human health, community safety, and environmental degradation threats posed by the project. We believe the risks far outweigh benefits in this case.**

**Please deny this permit!**

Thank you for your time and serious consideration of our concerns!

Robin L. Blakeman

Project Coordinator, Ohio Valley Environmental Coalition