

August 18, 2017

Virginia Department of Environmental Quality
629 East Main Street
Richmond, VA 23219

RE: Atlantic Coast Pipeline – Additional 401 Water Quality Conditions

The Independent Petroleum Association of America (“IPAA”) submits the following comments in support of the expeditious review and approval of the Department of Environmental Quality’s 401 Water Quality Certification for the proposed Atlantic Coast Pipeline. IPAA submits that the final Environmental Impact Statement issued by the Federal Energy Regulatory Commission supports issuance of the certification, finding that Atlantic Coast’s “surface water and wetlands impacts would be effectively minimized or mitigated.”

IPAA represents the thousands of companies that drill 95 percent of America's onshore and offshore oil and natural gas wells, including producers in Virginia. America’s independents produce 54 percent of American oil and produce 85 percent of American natural gas. IPAA members rely on a strong, safe network of pipelines to transport natural gas and its associated products to consumers.

IPAA is aware that your study of the Atlantic Coast Pipeline’s impact on water quality will center on the potential effects on water quality of construction and operation in upland areas, including karst and steep slope terrain. This focus will provide an added layer of environmental protection and goes well beyond other regulatory requirements. The pipeline’s plans for construction in these upland areas are significant and substantial, and they will minimize any potential effects on water quality. The proposed route was carefully surveyed to avoid features such as sinkholes and caves. Numerous adjustments were made to the route to protect and bypass these formations. The project will use best-in-class construction and engineering techniques specifically designed to protect karst geology; the pipeline will also be engineered, designed and built with materials that withstand sinkhole formation without compromising safety or pipe integrity. The project’s plans for controlling erosion, sediment, and storm water pollution appear very thorough and comprehensive.

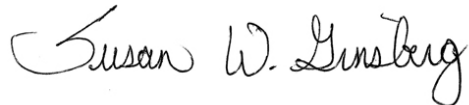
The project will also promote the economic health and energy security of the Commonwealth while protecting the environment. The current interstate natural gas pipeline system is simply inadequate to serve the energy needs of Virginia and the entire Southeast. The abundant and economical supplies now being produced in the Appalachian Basin are virtually inaccessible in much of Virginia. These constraints have hindered economic growth in much of the Commonwealth. Businesses thinking of expanding their operations or relocating here cannot be assured that they will have adequate access to the fuel.

The current pipeline system is also working against efforts by utilities in Virginia and elsewhere in the Southeast to make greater use of natural gas – an environmentally-friendly fuel with lower levels of emissions – for power generation. With the Atlantic Coast Pipeline in operation, that situation would change very quickly. Adequate and economical natural gas would be accessible to more power producers in our region. Atlantic Coast

Pipeline's capacity would also provide much-needed backup to the increasing supplies of renewable, intermittent energy that Americans are demanding from their utilities.

Thank you for the opportunity to provide comments. With the growth in American energy production—and its attendant benefits in creating new jobs, providing consumers with affordable energy, lowering manufacturing costs, and improving air quality—comes the need for infrastructure to move the commodity to markets. The Atlantic Coast Pipeline creates an opportunity for the use of natural gas to generate needed electricity. As such, IPAA urges the Department to issue the certification needed for this necessary and safe project to move forward.

Respectfully submitted,

A handwritten signature in black ink that reads "Susan W. Ginsberg". The signature is written in a cursive style with a large initial 'S'.

Susan Ginsberg
Vice President
Crude Oil & Natural Gas Regulatory Affairs
202-857-4728