

Comments on Groundwater Resources Section 4.3.1, pages 246-269

Always include info about your own land, water, etc. to your comments!

The DEIS points out that there are a large number of private wells within 150 feet of the construction “workspace” corridor, especially in Nash, Johnston and Cumberland Counties, as well as some springs all along the ACP proposed corridor. ACP and its contractors have not completed a survey of wells “due to lack of survey access”. There is significant concern on the part of landowners about giving ACP access for surveying, and without full knowledge of the wells’ presence no construction approval should be given. Wells up to 500 feet from the ACP workspace could be impacted by construction and operations and must be mapped and included in all construction plans.

ACP has said it will test water supply wells and springs within 150 feet of the workspace, but well testing must be increased to wells up to 500 feet from the workspace. In addition to testing again immediately after construction, the testing must continue annually during pipeline operations. In addition to testing for the range of inorganic chemicals specified, and oil and grease, the testing must include fuels, lubricants, hydraulic fluids and any explosives use, as well as the components of natural gas liquids and well flow rate. The DEIS acknowledges that natural gas liquids represent the greatest ongoing threat to groundwater during ACP operation.

All well tests must be by labs certified for all of the specified contaminants and to detection levels below any NC groundwater or IMAC standards. All results must be reported to well owners with a comparison to those standards within 20 days of testing. ACP must state the procedure for a well owner to make a claim of diminished flow rate or contamination their well for drinking water, and act within 15 days of a substantiated claim to provide bottled water and within 60 days to provide a permanent replacement safe water supply.

In the vicinity of known contaminated sites, well testing must include all reasonably expected contaminants that may contaminate wells, both before and after construction activities and annually for 10 years.

ACP must specify what exactly is meant by “work with landowners to relocate existing septic systems and provide compensation for costs and loss of usable land” and the procedure for initiating such work and compensation.

The pollution prevention plans prepared by ACP to avoid or minimize impacts during construction and operation must be available to the public in plain language. The training of employees, inspectors and enforcement of construction violations at all stages must be transparent. Refueling or other handling of fuels and other hazardous materials must be prevented within 500 feet of wetlands, private water supplies or municipal water supply wells. 100 to 400 feet is an inadequate margin of protection. No variances must be permitted for reduction of setbacks.