



# CENTER FOR COALFIELD JUSTICE

PO Box 4023 • 31 E Chestnut St, Suite 102 • Washington, PA 15301 •  
724.229.3550 • [www.centerforcoalfieldjustice.org](http://www.centerforcoalfieldjustice.org) •  
[info@centerforcoalfieldjustice.org](mailto:info@centerforcoalfieldjustice.org)

June 21, 2022

## Submitted via eFiling

Project Docket Number: CP22-44-000  
Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, DC 20426

## Re: Notice of Scoping Period Requesting Comments on Environmental Issues for the Proposed Ohio Valley Connector Expansion Project.

To Whom It May Concern,

Pursuant to the notice of scoping period requesting comments on environmental issues for the proposed Equitrans Ohio Valley Connector Expansion Project ("OVCX"), The Center for Coalfield Justice ("CCJ") respectfully submits the following comment.

CCJ is a Pennsylvania-incorporated not-for-profit organization with federal Internal Revenue Service § 501(c)(3) status recognition in Washington, PA. CCJ is a membership organization with a mission to "improve policy and regulation for the oversight of fossil fuel extraction and use; to educate, empower and organize coalfield citizens; and to protect public and environmental health." CCJ has thousands of members and supporters and is governed by a volunteer Board of Directors. Many of our members and supporters are Greene County residents. The following comment reflects the input we received from those members and supporters.

Equitrans' proposed OVCX development in Greene County, Pennsylvania, runs counter to its pillars, policies, and commitments by bringing increased pollution to an environmental justice community. In 2021, Equitrans announced its Corporate Sustainability Report, which included its Five Pillars of Sustainability: (1) Health & Safety Leadership; (2) Environmental Stewardship; (3) Corporate Governance; (4) Economic Impact; and (5) Stakeholder Engagement.<sup>1</sup> Since then, Equitrans has also adopted "exploring and embracing new technologies, innovative approaches, and collaborative partnerships to do its part in addressing

---

<sup>1</sup> Abbreviated Application of Equitrans, L.P. For Certificate of Public Convenience and Necessity, Filed on January 28, 2022, with FERC, 1-44, at 8.

climate change for the benefit of all."<sup>2</sup> Additionally, the application states that "Equitrans has enhanced its efforts on outreach, environmental justice, and emissions reduction."<sup>3</sup> Equitrans' effort to reduce emissions has been installing oxidation catalysts and purchasing turbines with lower emissions at the Corona and Plasma compressor stations.<sup>4</sup> These enhancements should not go unnoticed. Still, these actions fall short of Equitrans' adopted stance on "addressing climate change for the benefit of all."

### **The Proposed OVCX Project will bring a Significant Increase in Air Emissions to Greene County.**

Equitrans has proposed to acquire the Cygrymus Compressor Station ("Cygrymus") located in Greene County, Pennsylvania. Currently, Cygrymus is operating under one compressor unit with an average flow of 11 MMcf/d. If awarded the entire development permit, the existing compressor unit would be replaced with two Taurus 70 gas turbine compressors with approximately 22,032 nominal horsepower.<sup>5</sup> This change would increase the average flow to around 250 MMcf/d.

Additionally, Equitrans has forecasted that, even though Cygrymus will not exceed the major source threshold for Title V, Cygrymus will have a projected increase in all measurable pollutants.<sup>6</sup> Even more troubling is that methane levels will increase by over 333 tons per year, CO<sub>2</sub> levels will increase by 94,708 tons per year, and CO<sub>2</sub> equivalent will increase by 103,344 tons per year.<sup>7</sup> These projected increases run afoul to Equitrans' own "pillars of sustainability," especially its health and safety leadership or environmental stewardship pillars. Equitrans' reports show that it will add significant pollution to a community that will not directly benefit from the operation.

### **Equitrans Failed to Provide Adequate Notice to Environmental Justice Communities.**

The proposed OVCX project is forecasted to occur in two communities that have been identified as meeting the poverty level and the low-income threshold criteria for an environmental justice community. One of these communities is census block 42—59-970400-004 in Greene County, Pennsylvania, where the Cygrymus Compressor Station is located.

First, Equitrans failed to give adequate notice to an environmental justice community of their proposed OVCX project. Environmental justice communities have historically been awarded a more generous notice period than other communities.<sup>8</sup> There are many valid reasons for this; however, one simple one is to ensure they have ample time to prepare and better

---

<sup>2</sup> Id.

<sup>3</sup> Id. at 2.

<sup>4</sup> Id. at 6-7.

<sup>5</sup> Id. at 15.

<sup>6</sup> Equitrans Supplemental Information to January 28, 2022, Application, Document Accession# 20220509-5143, 1-368, at 9-7 – 9-8.

<sup>7</sup> Id.

<sup>8</sup> PA Department of Environmental Protection ("DEP") Office of Environmental Justice just completed its public comment period on its environmental justice draft policy which asks the applicant to begin scheduling a public meeting within 30 days of the DEP determining the application administratively and technically complete and, to give at a minimum a 30-day public comment period. See draft policy at:

<http://www.depgreenport.state.pa.us/elibrary/GetDocument?docId=4221701&DocName=ENVIRONMENTAL%20JUSTICE%20POLICY.PDF%20%20%3cspan%20style%3D%22color:green%3b%22%3eCOMMENTS%20DUE%20MAY%2011%2c%202022%3c/span%3e%20%3cspan%20style%3D%22color:blue%3b%22%3e%28NEW%29%3c/span%3e>

understand the proposed development in their neighborhood. Here, Equitrans published their open house for the OVCX project in Greene County in the February 18-24, 2022, edition of the Greene County Messenger.<sup>9</sup> This notice informed community members of the open house meeting on March 1, 2022. At the very best, this gave community members eleven (11) days' notice of the hearing. Meaningful engagement with impacted communities should be a foundational aspect of any developer in an environmental justice community, especially Equitrans, which claims to hold this issue as a threshold pillar.

A limited notice period is problematic for the scoping of environmental issues. Those who live within this community, the ones who know that area best, had minimal time and publication types to learn about and fully understand the project. In other words, those who see and experience the topography, the river systems, the wildlife, and much more did not have enough time to learn of the public meeting and have a meaningful conversation with Equitrans about the proposed development. Equitrans cannot make well-informed decisions concerning the Cygrymus Compressor station without meaningful input from the people that live, work, and recreate in the area.

Second, the Equitrans OVCX project does not lessen the burden on this environmental justice community; it increases the burden. The Abbreviated Application explains that the OVCX is located in sparsely populated areas. Equitrans also explains that they will use “best management practices” to avoid negative impacts on those who live in the area and rely on hunting and fishing for their subsistence.<sup>10</sup> Yet, as described above, this plan does not provide a single step that Equitrans will take to ensure that this community does not see increased harm or impact on their air quality.<sup>11</sup> Rather, as discussed above, Equitrans has introduced a plan in which more health hazards would be emitted into a community that is already marginalized. This project's potential impacts and contribution to the cumulative effects must be weighed against any arguments regarding its necessity.

Therefore, CCJ urges the Federal Energy Regulatory Commission to consider the following suggestions in the scoping period on environmental issues for the proposed OVCX project:

- For Equitrans to correctly report that it is making a well-informed decision in its environmental harm mitigation process in the OVCX project, it must conduct another public meeting within the community only after giving adequate notice of at least 30 days and by noticing this meeting in more than one local publication. Equitrans needs to understand the full scope of the community it wishes to operate in.
- For Equitrans to not run afoul of its pillars, policies, and commitments and for the Federal Energy Regulatory Commission to uphold its duty as a regulator, more stringent requirements must be placed on the proposed development in Greene County. Allowing Equitrans to develop the OVCX as proposed would degrade the current air quality in

---

<sup>9</sup> Equitrans Supplemental Information to January 28, 2022 Application, Document Accession# 20220509-5278, 1-4, at 3.

<sup>10</sup> Abbreviated Application of Equitrans, L.P. For Certificate of Public Convenience and Necessity, Filed on January 28, 2022, with FERC, 1-44, at 33.

<sup>11</sup> As noted above, Equitrans has highlighted its efforts to reduce local air quality impacts for both the Corona and the Plasma Compressor Stations. Still, this effort is not made for the Cygrymus Compressor Station, which is reported to increase air pollution in the community. See Abbreviated Application of Equitrans, L.P. For Certificate of Public Convenience and Necessity, Filed on January 28, 2022, with FERC, 1-44, at 33; and Equitrans Supplemental Information to January 28, 2022, Application, Document Accession# 20220509-5143, 1-368, at 9-7 Table 9.1-10.

Greene County and surrounding communities. Here, Equitrans has not even shown it will make a good faith effort to lower air pollution in Greene County. Instead, it explains what it will do and has done in Ohio and West Virginia concerning air pollution with the hopes that FERC and other agencies take its word that they are operating in the best interest of all stakeholders. The current proposal will degrade the current air quality in Greene County. FERC should work with Equitrans to develop and implement specific steps to reduce the amount of projected air emissions and adverse environmental impact. To approve the present application is to turn a blind eye to the detailed reports that have been submitted and thrust environmental and human harm onto yet another environmental justice community.

Thank you for your consideration.

/S/

Ethan Story, Esq.

Community Advocate

Center for Coalfield Justice

[ethan@centerforcoalfieldjustice.org](mailto:ethan@centerforcoalfieldjustice.org)