



**Barton Springs  
Edwards Aquifer**  
CONSERVATION DISTRICT

**TO:** MR. ALLEN FORE  
VICE-PRESIDENT, PUBLIC AFFAIRS  
KINDER MORGAN

**FROM:** MS. ALICIA REINMUND-MARTINEZ  
GENERAL MANAGER  
BARTON SPRINGS/EDWARDS AQUIFER CONSERVATION DISTRICT

**SUBJECT:** REQUESTS FOR DOCUMENTS, PLANS, REPORTS, AND ANSWERS  
REGARDING THE PERMIAN HIGHWAY PIPELINE PROJECT

**DATE:** MARCH 20, 2019

**CC:** MR. JAKE LARSON  
SENIOR ANALYST, PUBLIC AFFAIRS  
KINDER MORGAN

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I appreciated the presentation you provided to the Barton Springs/Edwards Aquifer Conservation District (BSEACD) Board of Directors last week as well as Kinder Morgan's responses to the Directors' and the attendees' questions. It was an informative and beneficial presentation. The purpose of this memorandum is to formalize the BSEACD's request for reports, plans, and answers to outstanding questions regarding the Permian Highway Pipeline project.

Please find attached the list of reports and plans that we request for our review. Please respond as to when Kinder Morgan will provide us with the reports and plans requested.

I have listed 18 questions that were either left unanswered following your presentation or that are in addition to those unanswered questions. Please respond with your answers as soon as possible.

Finally, you stated that Kinder Morgan is supported of sharing information but believed a collaborative relationship with the BSEACD is more important. We welcome this collaboration and look forward to obtaining this requested information and to future conversations and meetings.

## **I. PRE-CONSTRUCTION/DESIGN**

- Revised easement agreement indicating only natural gas transport.
- Corrosion protection plan.
- Karst survey report.
- Biological assessment.
- Cultural resource studies that include springs like Jacob's well or other sensitive karst features.

### Questions

1. Will a surface geophysical survey be done in conjunction with the karst survey?
2. What is the chemical composition of the natural gas to be transported? What toxic constituents will be present and what is their typical concentration in the gas to be transported?
3. What is the chemical composition of the condensate? What toxic constituents will be present and what is their typical concentration in the gas to be transported?
4. Will K-M notify the BSEACD when karst features are encountered during construction and be allowed access to significant features that are found?
5. Will K-M be willing to enter into an agreement with GCD's, Counties, and Cities to formally document with these entities the prohibition of liquid products in the pipeline and agree to certain construction and operations methods that protect the aquifer and water supply?

## **II. CONSTRUCTION**

- Void mitigation plan
- Restoration and revegetation plan
- Erosion control and revegetation plan
- Stormwater Pollution Prevention Plan
- Aquifer protection plan be developed - plan should be based on the TCEQ Edwards Rules (Texas Water Code, §26.046).

### Questions

6. What are the specific sedimentation controls? What type of sedimentation controls are required in Pennsylvania? How is this different in Texas?
7. Who will inspect erosion controls and how often?
8. Where is the concrete cap located in the trench? Does the concrete cap hinder the natural gas escaping to atmosphere during a leak?
9. What is the size of the disturbed area before it is revegetated? Typically, how long does the soil remain exposed from the start of disturbance to revegetation?
10. The Mopac project is 2 miles long and has encountered over 40 voids during excavation. These voids slow down project construction as it takes time to evaluate the void to determine proper mitigation. How will K-M respond to unknown voids found during construction?

### III. OPERATIONS

- Spill Response plan – request plans that address spills that occur during construction and leaks that occur after the pipeline is in operation.
- Pipeline management plan (K-M Standard Integrity Management Program)

#### Questions

11. What is the estimated volume of condensate that can be found in the pipeline or compressor stations at any one time?
12. If a compressor station fails to remove the liquids, what is the volume of liquid in the pipeline.
13. What is the volume of condensate that could escape from the pipe?
14. It was stated at the presentation that the condensate occurs at when the temperature changes. Will additional condensate liquids be generated at leak locations when the gas rises from the underground pipeline to the surface? How does the volume of the condensate increase from micro leaks to larger leaks?
15. At the presentation, it was stated K-M detects leaks through pressure changes in the pipeline. How are micro leaks detected?
16. If a leak from corrosion is along the bottom of the pipeline, the leak will be roughly 7 or 8 feet below the surface. As the gas travels out of the trench, will it be likely to enter voids along the trench walls? Why or why not?
17. Will herbicides be used for maintenance of the easement?
18. If there were an explosive incident, what would be the damage to the karst structure that is the water supply?