



4/12/22

To whom it may concern:

I am writing to comment on PUC docket L-2019-3010267, the proposed changes to Chapter 59 of Title 52, relating to pipeline regulations.

In the proposed 59.131, I agree with the definition of "affected public" as "residents and places of congregation (businesses, schools, and the like) along the pipeline and the associated right-of-way within 1,000 feet, or within the LFL [lower flammability limit], of a pipeline or pipeline facility, whichever is greater." In fact, the public could be affected at a much greater distance, but this is a good start.

In the proposed "design requirements" at 59.135, anticipation of sinkholes and subsidence is a much-needed addition.

In the proposed "operation and maintenance" wording at 59.139, the leak detection based on the Real Time Transient Model is insufficient. This method has failed to detect numerous pipeline leaks. The requirement to "odorize all HVL pipelines" should be immediate, not invoked after five years of failure, as described.

We also need better supervision from the local, state and federal agencies, that the guidelines and permits are followed appropriately to provide the public proper protection from imminent danger.

Patrick Robinson

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