

# Surveillance Report 1/24/19

## Pipeline Compliance Surveillance Initiative (CSI)

The CSI is a program of the Allegheny-Blue Ridge Alliance (ABRA) and its member groups.



[abralliance.org](http://abralliance.org)

[pipelineupdate.org/csi](http://pipelineupdate.org/csi)

# ***Pipeline CSI***

## On the Ground & In the Air

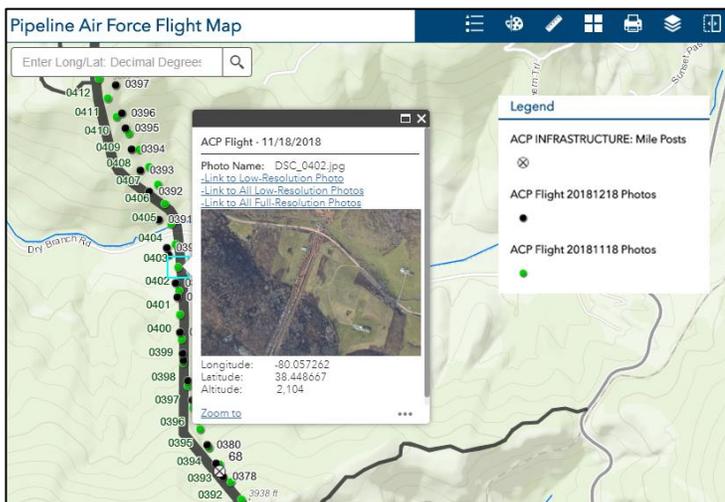
The Pipeline Air Force conducted three ACP surveillance flights over the 200-mile CSI focus area in November and December of 2018.

Flights on November 18 and December 12 covered the pipeline corridor in West Virginia, from Harrison to Pocahontas Counties, where about 45 miles of construction activity has occurred and about 10 miles of pipeline have been deployed (installed or strung on the ground). A flight on December 23 covered the pipeline corridor in Virginia, from Highland to Buckingham Counties, where about 40 miles of trees have been felled, but no earth-disturbing construction activity has occurred.

Aerial photos include both:

- 1) Nadir images (straight down) obtained at 3-second intervals at 3,000 feet above ground level with a camera mounted in the bottom of the plane.
- 2) Oblique images (angled/side-view) obtained for areas of particular interest with a hand-held camera.

Additional photos are collected by ground-based citizen volunteers.



AERIAL PHOTOS OBTAINED BY THE PIPELINE AIR FORCE, AS WELL AS OTHER INFORMATION CONCERNING ACP COMPLIANCE WITH ENVIRONMENTAL REQUIREMENTS, CAN BE ACCESSED ON THE CSI ONLINE MAPPING SYSTEM.

[CSI Mapping System](#)

## Complaint Submission

Based on analysis of the November and December 2018 flight photos by CSI Aerial Image Reviewers, 22 separate complaints concerning regulatory non-compliance were submitted by the West Virginia Rivers Coalition to the West Virginia Department of Environmental Protection.

These complaints concerned:

- Failure to install, or delayed installation of, erosion and sediment control measures. (5 incidents)
- Deviation from approved erosion and sediment control and construction plans. (1 incident)
- Missing, failed, damaged, or improperly installed or maintained silt fences, filter socks, or other perimeter control devices. (13 incidents)
- Missing, failed, damaged, or improperly constructed right-of-way diversions (water bars or slope breakers) and outlet structures. (2 incidents)
- Sediment discharge into streams and wetlands. (1 incident)

## Complaint Response

Following a December 10, 2018 inspection conducted in response to some of these complaints, WVDEP issued a Notice of Violation to Dominion Energy Transportation, Inc. for noncompliance with permit terms and conditions and failure to comply with the project's approved Storm Water Pollution Prevention Plan. Cited deficiencies included:

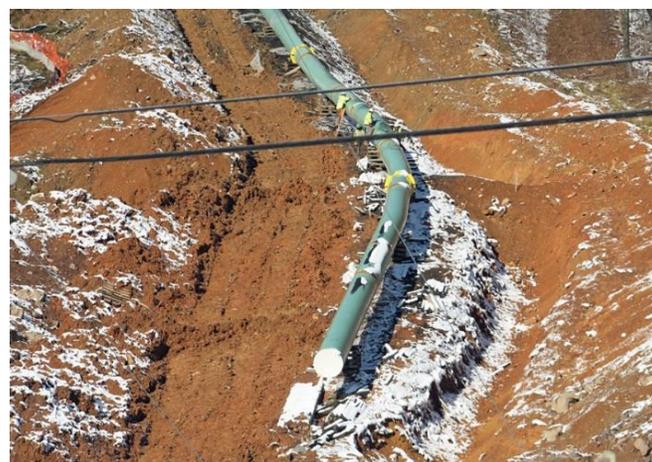
- Erosion control devices not in place
- Water bars not installed
- Perimeter controls not in place

Click [here](#) to access the WVDEP Inspection Report and Notice of Violation.

The CSI will continue to track agency response to complaints and to maintain observation of the complaint locations.



ACP STREAM CROSSING IN POCAHONTAS COUNTY. THE CROSSING DOES NOT CONFORM TO THE METHOD SPECIFIED IN APPROVED PLANS.



ACP CONSTRUCTION IN POCAHONTAS COUNTY. WATER BARS ARE NOT INSTALLED AS REQUIRED FOR STEEP SLOPE CONSTRUCTION.



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