

Bureau of Land Management
Albuquerque Field Office

New Mexico Products Pipeline
Environmental Impact Statement

Scoping Report

DRAFT
April 9, 2002

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Scoping Process

The National Environmental Policy Act requires public involvement in determining the scope of an EIS analysis. On December 28, 2001, a Notice of Intent to prepare an Environmental Impact Statement (EIS) and conduct EIS Scoping Meetings was issued for the New Mexico Product Pipeline Project which consists of the conversion of an existing pipeline and construction of new pipeline and above ground structures for the transportation of Refined Petroleum Products from Odessa, Texas to Bloomfield, New Mexico.

A public scoping period followed the NOI and was closed on March 3, 2002. During the scoping period, the Lead Agency for the EIS, the Bureau of Land Management (BLM) conducted 5 public meetings. A Scoping Newsletter for the project described the initial proposed pipeline project, potential issues and invited public involvement. The newsletter was widely distributed and press releases were sent to newspapers and radio stations in the project area. The public meetings were held on the following dates and in the following locations:

January 15, 2002— 7:00 p.m. Open House with Equilon— 5:00 p.m.
Moriarty Civic Center
201 Broadway
Moriarty, NM 87035

January 16, 2002 — 7:00 p.m. Open House with Equilon— 5:00 p.m.
Placitas Elementary School
5 Calle De Carbon
Placitas, NM 87043

January 17, 2002 — 7:00 p.m.
Bloomfield Cultural complex
333 South First Street
Bloomfield, NM 87413

January 22, 2002 — 7:00 p.m. Open House with Equilon— 5:00 p.m.
Woolworth Community Library
3rd and Utah Street
Jal, NM 88252

January 23, 2002 — 7:00 p.m.
Ector County Library
321 West 5th Street
Odessa, TX 79763

Meetings in Bloomfield and Odessa consisted of an open house hosted by the Bureau of Land Management. Comments were solicited from the public during the open houses. Meetings in Moriarty, Placitas and Jal consisted of an open house followed by a brief formal presentation on the proposed project and the environmental process by the Bureau of Land Management and Equilon Pipeline Company representatives. The presentation was followed by an informal, small group, discussions where the public provided input which was recorded on flip charts. A summary of those comments is attached. Approximately 250 people attended the 5 scoping meetings.

Written comments were received in the form of comment cards and letters. A total of 97 written comments were received, 96 of which are transcribed and are attached. One comment from Carol Parker is quite lengthy and is attached. This scoping report contains the following:

- Summary of the comments from the public meetings sorted by meeting and general topic of concern
- Sign in records from the meetings
- Transcript of the written comments
- Copy of the comment from Carol Parker

Summary of Comments Gathered at Public Scoping Meetings

MORIARTY, NEW MEXICO, MEETING

Moriarty Terminal Issues/Safety

- What is the status of the Navajo terminal and will it affect the Equilon terminal/pipeline?
- Are terminal stations inspected as often as the pipeline?
- Concern over high school traffic and teen drivers on the route to/from the terminal

Traffic

- Concern over the safety issue with school buses.
- Traffic is an issue – City Road A195 to Hwy 41 – there is currently a problem. The speed limit is not observed and there is traffic congestion going north
- Proposed terminal location will impact traffic on Walker Rd going north
- Concern over whether the state highway should be upgraded or whether there should be a traffic signal at Walker Rd.
- What is the proposed volume of traffic on Walker Rd and Highway 41? A study should be done.
- Concern over the use of I-40 to transport product by truck. There would be an increase of traffic volume on an already congested corridor. Additional population growth will add to that congestion.
- Concern over increase traffic related to the pump station.
- Maps are needed for where excavation will be necessary in County Roads.
- An acceleration/deceleration land should be added due to heavy trucks and buses.

Pipeline Safety General Issues

- Concern over security of the terminal and the pipeline.
- Concern over changes in product, elevation changes and change in direction.
- Based on current population density, is the pipeline still in a valid location and made of the right material for 2002?
- How are detectors spaced? Are they more often in populated areas, or where T&E species may occur?
- Concern that the pipeline is in an area close to population and national forest.

Pipeline Design and Integrity

- What are the criteria for pipeline construction?
- Concern over the conflict over the condition of the existing line with current regulations
- Concern over the age of the existing pipeline.

- Concern over the age.
- Concern that this is a middle aged pipeline.
- What is the probability of an accident for this pipeline taking into consideration its age?
- Is there a federal mandate related to the age of the pipeline?
- What about metal fatigue (micro-fractures) on the pipeline from expanding and contracting over the years?
- Will the change in product affect the pipeline physically?
- What are the pressures on the pipeline? There are different pressures for different types of products, how will that affect the pipeline?
- Concern over the integrity of the welds on a 30-year old pipeline.
- Concern with pressures outside the norm (measurable pressures).

Leak Detection

- Are there means to detect small leaks (10 gallons/minute) quickly?
- Concern over the impacts of leaks on drinking water supplies.
- Concern with undetectable leaks and the impacts to water quality.

Human Risk

- Concern over the explosion risk and potential for fires.
- Concern over fire safety/explosion risk
- Request for a risk comparison of a new pipeline vs. the existing pipeline.

Operation and Maintenance

- Who ensures that maintenance is being done correctly?
- Do we know what the results of the pipeline inspection are?
- How closely do they look when they do external inspections?
- Smart pigging is not 100% accurate.
- How has the pipeline been maintained – where are the records?
- Need maintenance records of the existing line including dates of inspections.

Environmental Impacts

- Natural resource issues
- Concern with soil erosion and watershed protection.
- Concerns with noise, odor, and traffic associated with the proposed terminal.
- Concern over the environmental impact resulting from the pipeline and the terminal.

- Concern over revegetation.
- There are caverns in the Edgewood area that are of concern.
- The existing pipeline is undercutting the soil and causing the degradation of natural resources.
- Concern over the noise generated by the compressor station/terminal.

Water Resources

- Concern over aquifer contamination.

Socioeconomic

- Concern over the financial condition of the County.
- Concern over the Moriarty pump station. What does Moriarty get out of it?
- Will Equilon assist the County with maintenance from the pipeline to Walker Rd.
- Who pays for road maintenance and improvements necessary due to increased traffic to the terminal?
- Concern over unbalanced impacts to rural areas and populations – environmental justice
- Equilon should bond for potential impacts to protect the county even if Equilon goes out of business.

Emergency Response

- What is the capability of the local fire department to fight a pipeline fire? How does Equilon interface with the local fire department?
- Are there evacuation plans in place? How are those plans disseminated to the public?
- Will Equilon be willing to financially assist the county for law enforcement?
- The emergency access routes need to be paved.
- What occurs if there is a break?

Cost/Benefit

- What is the reward vs. the risk of this project?

Mitigation

- What assurances will there be that reclamation will take place?

Alternatives

- Recommendation to reroute the pipeline around high-density areas.
- Can the pipeline be relocated to unpopulated areas to have a bigger safety buffer?
- Look at alternative locations for the terminal.
- Prefer a new pipeline be constructed.
- Remove the risk by putting in a new pipe.

Landowner Issues/Private Property

- Will new use infringe on current uses?
- Landowners along the line need to be contacted.
- Need for additional landowner/company coordination.
- Concern over impacts to private property rights.
- Concern of the line crossing private property – no contact has been made to private property owner.
- Who is the responsible party when line is on private property?
- Need a location map showing property ownership.

Agency Responsibilities

- Who has jurisdiction over the transportation of these products?
- Who is responsible for oversight?

General Comments and Questions

- What would stop the project?
- What would it take for the BLM to choose the No Action alternative?
- Need to look at historical data and the big picture.
- Need to look at the cumulative impacts.
- What is the jurisdiction of the local government?
- Who is responsible/liable?
- Request for before and after photos.
- What is the schedule of activity?
- Desire not to become another “South Broadway” or Mountain View (industrial areas in ABQ)
- What is the source of the product?

- Disruption of potential upgrades
- What is the status of the existing right of way?
- Questions on easement/ROW's – Existing vs. proposed or adjusted
- Will abandoned pipe be removed?
- Will there be a new pipeline in the area of the existing line?

PLACITAS, NEW MEXICO, MEETING

Pipeline Safety General Issues

- Are inspection records available for public review and where are they kept?
- Analysis needs to include high risk areas (information request – pipeline design)
- Equilon's safety record and impacts to communities adjacent to Equilon lines
- Political and financial considerations may outweigh environmental and safety concerns.
- Concern over pipeline as a target for terrorism.
- Who regulates the industry and sets standards for pipeline safety?
- How will safety be addressed?
- Safety is the primary concern.
- The inspection process is inadequate just as it was in Bellingham.
- Evidence leaves people with zero confidence in safety checks by the industry.
- Concern that when this line was put in, there were no real standards.
- There is no confidence in the company's ability to ensure safety.
- Does BLM have the expertise to make decisions about pipeline safety?
- BLM does not have the credentials or experience in pipeline safety.
- Concern over the safety of an empty pipeline and the fumes.
- Do new safety standards apply to older lines?
- What is the monitoring and control from Houston? How does that monitoring effect safety?
- Request for safety records for Equilon for the last 5-10 years. Want a break down of the record by age of the pipeline. How has the company reacted to a burst in a line? What assurances are there that a burst won't happen?
- What are the effects of the cathodic protection on houses/people/ecosystems?
- Does the company have to post a performance bond for accidents?

Pipeline Design and Integrity

- Will the new construction on each end of the line be the same type of construction as the existing line?
- What pressure can the pipe withstand? How will a fire/explosion effect the pipeline? What is the flash point?
- Are requirements for an old pipeline the same as for a new one? (safety standards)
- When was the line last smart pigged?
- Are the seam welds up to code?

- There has been a change in pipeline technology and the existing pipeline is not up to current technology.
- The proposed pipeline is not new, just retrofitting – not newest technology.
- Concern over defective weld (pipeline safety – integrity of pipeline and inspection).
- Concern over safety of the pipeline given the age and potential damage to the aquifer and the school.
- Concern over the difference in elevation from the mountains to Placitas and how that would effect a potential leak.
- Age is an issue – the pipeline is too old.
- Concern over the integrity of the welds, not the pipe itself.
- According to a Wolverine Company official, a new pipeline would be safer than the old one. Why use the old pipe in sensitive areas?
- Concern over the strength of the welds – can that be fully assessed?
- Will welds be brought up to current code?
- The pipeline is too old.
- Concern over differences in elevation and pressure.
- Concern over fluctuating PSI. Is the testing adequate to account for those differences in pressure?
- Concern over rock around the pipelines and the integrity of the cathodic protection.
- Concern over places where pipe is exposed.
- What is the practical lifetime of a pipeline?

Spill Impacts/Response

- Risk from hazardous material spillage and fire
- Prevention of spills is the most important thing.
- What would be the volume of a potential spill?
- Request for safety data on the different types of products (diesel, jet fuel, etc).

Leak Detection

- How will slow leaks be detected?
- How are leaks detected in subsurface fissures?
- Request for a detailed analysis of a 200 thousand gallon spill.
- How will pin-hole leaks be detected?
- Request for tests and monitoring to ensure that there is no ground water contamination.
- What is the smallest leak that can be detected in the monitoring stations?

Human Risk

- Conditions are different now than when the pipeline was put in – there has been huge population growth.
- Concern over the quality of the risk – the potential human tragedy is immense.
- If a risk assessment is completed, when will it be done and how can the public access it?
- Are there differences in the risk of flammability/exposure/safety among the various types of products?
- Concern over children and adults being present in pipeline corridor.
- Concerned with proximity to schools and residential areas.
- Concern for residents and safety.
- Pipeline is too close to the school.
- Safety of children at the school is the number one priority.
- Concern over the proximity of the pipeline to the school and community center.

Operations and Maintenance

- What is the current pressure rating on the pipeline?
- What types of fuels will be carried in the line?
- Who is responsible for oversight and testing of the line?
- Will Equilon be operator of line?
- The pipeline use to be replaced and maintained more than it is now – every 20 years.
- Does pipe continue to function the same as it ages – how does age change the operation?
- Request for analysis of the impacts of the changes in products.
- How frequent are the valves?
- How does the operating system for this pipeline compare to the El Paso line and the Washington line? Is it the same?

Environmental Impacts

- Concern over environmental impact of a new pipeline.

Wildlife Resources

- Concern over impacts on endangered species (wildlife impacts)

Geologic Resources

- Seismic activity and testing is inadequate
- Request for geologic studies on a 50 year old pipeline

Water Resources

- Aquifer contamination.
- Concern over groundwater contamination from operation of the pipeline.
- Concern over water quality impacts to subsurface aquifers and Las Huertas Creek.
- How are leaks detected in water?
- What are the potential impacts on the Rio Grande?
- What would be the environmental impact of a 150,000-gallon spill into the aquifer?
- Concern over aquifer recharge areas and Las Huertas Creek.
- Concern over all the different pipelines and water sources.

Visual Impacts

- Concern over light pollution from pump stations.
- Concern over the visual impacts from the Placitas pump station.

Socioeconomic

- Concern over cost to the community to provide emergency services.
- Will compensation occur for decrease in property values resulting from pipeline?
- How does the community of Placitas benefit from this project?
- Who represents private property interests and how does this project effect the future use of property?
- Will the company assume the cost of clean-up and damage to real estate of a spill?

Emergency Response

- There is no ability for local emergency response to deal with jet fuel.
- Does Equilon have an emergency response team for clean-up? How fast is the response? How does the emergency response team travel?
- The current system of one-call is not as effective as it should be.
- Does the community have the capability to provide emergency response?

- What is the proposed emergency response system?
- Will Equilon help Placitas to prepare for emergency response?
- What are the local emergency response capabilities? Are they involved in this process?

Segmentation Issue

- Concern over the segmentation issue.
- How is the split into two EIS's consistent with NEPA?
- Is New Mexico really the end of the pipeline?

Supply and Demand

- There is no correlation for price decrease as presented by Equilon.
- What percentage of the product will stay in New Mexico?
- Question whether there is a shortage of gas in New Mexico.
- Question the validity of the growth projections projected by Equilon.
- Where would the refined fuel go from Bloomfield?
- Question if there will really be an increase in demand as presented by Equilon.
- If there is an increase in demand in New Mexico, why is the pipeline going to Bloomfield?

Cost/Benefit

- Is Equilon willing to make a short-term investment (replacing the pipeline) in the community to gain community support?
- Would rather have a newer pipeline than lower prices?
- The company will still make a profit if they have to replace the line.
- Request for a cost-benefit analysis.
- Does the need of one company to make money outweigh the health, safety and welfare of the citizens of New Mexico?
- Request for a cost benefit analysis of a new pipe vs. retrofitting the existing pipe.

Mitigation

- If the pipeline remains where it is through Placitas, the community wants Equilon to pay for a new community center and a new school in different locations
- Each resident near the pipeline should receive compensation

- How will slow leaks be mitigated?
- Request for closer spacing of cut-off valves in populated areas.
- Recommendation that Equilon put up a \$10 billion bond in case of explosion or damage to wells and groundwater.
- What are the guarantees that the company is willing to put forward to ensure that no damage will occur?
- Is the company willing to assist local government in financing security for the pipeline?

Alternatives

- Replace the pipeline with double walled pipe through Placitas if materials other than oil is run through the pipe.
- Look at new state of the art pipeline as an alternative.
- Look at rerouting.
- Replace pipeline from the top of the mountain to the Rio Grande.
- Either move the pipeline or put in a new one.
- Use existing capacity on other lines rather than use this one!
- Move the pipeline north, away from populated areas.
- Do not want existing pipe activated.
- Relocate line around Placitas.
- Put in a new pipeline in Placitas area.
- Equilon should spend money for upgrading the existing line or relocating it and live with lower profits.
- EIS should evaluate the relative risks of other methods of petroleum transport.

General Comments and Questions

- Desire for response to these questions!
- What happens as companies merge?
- What are the real impacts of this proposal?
- It is unacceptable to open the pipeline.
- Placitas has met quota for pipeline.
- Inappropriate use for this area.
- How does what is happened with Enron impact Equilon?
- The Golden Gate Bridge analogy is flawed.
- Is there an appeal process?
- How can we gain confidence given past failures?
- The community feels that Equilon has a lack of corporate integrity.

- If the decision of this process is no, can the company resume transporting crude in the pipeline?
- Vote of everyone in the room and to whether the pipeline is worth the risk.

Agency Roles and Responsibilities

- How much of the pipeline is on BLM land, how much is on Forest Service?
- What is BLM's liability as issuer of the permit?
- Does BLM ever select the no action alternative?
- Incorporate comments on the DEIS into the body of the document, not in an addendum.
- What role does the NMPSB (New Mexico Public Safety Board) play in the process? Do they have review authority?

BLOOMFIELD, NEW MEXICO, COMMENTS

No specific comments were taken from the public. Several contractors inquired about work opportunities.

JAL, NEW MEXICO, COMMENTS

General Comments and Questions

- Interest in start dates
- Would ground surveys use "sniffers"?

Pipeline Design and Integrity

- Comfortable with pipeline safety.
- This line would be safer than others because it will be new.

Leaks Detection

- Concern over how long a leak could go on before it is detected.

Emergency Response

- How fast can emergency response crews react to a spill?

Water Quality

- Concern about water quality/aquifer contamination if a spill occurs.

ODESSA, TEXAS, COMMENTS

No specific comments were taken from the public. Several contractors inquired about work opportunities.

Scoping Meeting Attendance Roster

New Mexico Products Pipeline Project EIS Scoping Meeting Attendance

First Name	Last Name	Company	City	State	Zip
Moriarty, New Mexico January 15, 2002					
Carolyn	Monel		Sandia Park	NM	87047
Barbara	Bass		Moriarty	NM	87035
Paula and Cary	Bush		Edgewood	NM	87015
Walt and Betty	Zeihner		Edgewood	NM	87015
Catherine	Suiter		Sandia Park	NM	87047
Geri	Oslow	East Mountain Telegraph	Cedar Crest	NM	87008
Anne	Boches		Albuquerque	NM	
Mark	Rolfson		Sandia Park	NM	87047
G.	Romero		Moriarty	NM	87035
Dave	Wesley	Paako Ridge	Cedar Crest	NM	87008
Jack	Morrison		Moriarty	NM	87035
Janus	Wilczynski		Sandia Park	NM	87047
Don	Wallin		Moriarty	NM	87035
Ted	Hart	City of Moriarty	Moriarty	NM	87035
Don	Ansley	Red Canyon Ranch	Moriarty	NM	87035
Vern	Wood		Edgewood	NM	87015
Ron	Ensiminger		Moriarty	NM	87035
KL and EL	Johnson		Sandia Park	NM	87015
W and J	Grannemann		Edgewood	NM	87015
Brian	Cunningham		Moriarty	NM	87035
Jeanne	Lubbering		Edgewood	NM	87015
Terry	Rister		Sandia Park	NM	87047
Ben	Albrechtsen		Ogden	UT	84414
J.T.	Turner		Moriarty	NM	87035
Mike	Bertin		Sandia Park	NM	87047
Preston	West		Moriarty	NM	87035
Judy	Suiter		Sandia Park	NM	87047
Carole	Hedden		Sandia Park	NM	87047
Jackie and Murray	Bishop		Sandia Park	NM	87047
John	Cordova		Albuquerque	NM	87110
Rob	Murray		Sandia Park	NM	87047
Chris	Gonzalez		Albuquerque	NM	87102
Jan	Raven Wolf		Sandia Park	NM	87047
Pete	Candelal		Moriarty	NM	87035
Jace	Alderson		Moriarty	NM	87035
J.C.	Alderson		Moriarty	NM	87035
Carolyn	Carlson		Estancia	NM	87016

Placitas, New Mexico January 16, 2002					
M. Pam	Colton		Placitas	NM	87043
Mary	Strickman		Placitas	NM	87043
Catherine	Adrian		Placitas	NM	87043
Johanna	Johanson		Placitas	NM	87043
Jay and Cindy	Huber		Placitas	NM	87043
Cindy	King		Placitas	NM	87043
Mary	Palmer		Placitas	NM	87043
Barbara	Ruhuna		Placitas	NM	87043
Maureen	Hightower		Placitas	NM	87043
Don	Brown		Albuquerque	NM	87107
Susan	Passell		Placitas	NM	87043
Bill	Turner	ONRT	Albuquerque	NM	87102
Doris	Fields		Placitas	NM	87043
Paul	Ingles		Placitas	NM	87043
Dave	Rockwell		Placitas	NM	87043
Jaffa	Frank		Placitas	NM	87043
Michael	Sedier		Placitas	NM	87043
Bruce	Reid		Placitas	NM	87043
Roxana	Reid		Placitas	NM	87043
Sandra	Champion		Placitas	NM	87043
Maureen	Castro		Placitas	NM	87043
Jim	Iwerks		Placitas	NM	87043
Joanne	Thompson		Placitas	NM	87043
Joe	Johnson		Santa Fe	NM	87504
Fritz	Valdez		Placitas	NM	87043
David	Southwick		Placitas	NM	87043
Ira	Carren		Placitas	NM	87043
R. J.	Lopez		Houston	TX	77004
Jerry	Grayson		Placitas	NM	87043
Kennie	Warren		Placitas	NM	87043
Camille	Chavez		Placitas	NM	87043
Michael	Meyer		Albuquerque	NM	87111
	Willson		Placitas	NM	87043
Bill	Perkins		Corrales	NM	87048
Jim	Martin		Placitas	NM	87043
Maxine	Hopping		Edgewood	NM	87015
John	Wolf		Placitas	NM	87043
Kenda	Huntley		Placitas	NM	87043
Virginia and Oz	Freegood		Placitas	NM	87043
Linda	Perkin		Placitas	NM	87043
B.	Gordon		Placitas	NM	87043
Reid	Bandeen		Placitas	NM	87043
Richard and Nancy	Gurtey		Placitas	NM	87043
Rebecca	Roth		Placitas	NM	87043
J. Marsden	DeLapp		Placitas	NM	87043

John and Linda	Bullock		Placitas	NM	87043
Janelle	Jersey	SPA-BIA	Albuquerque	NM	87108
Carol	Parker		Placitas	NM	87043
John	Foust		Placitas	NM	87043
Jennifer	Delaney		Placitas	NM	87043
Mary	Morell		Placitas	NM	87043
Bob and Judy	Gajkowski		Placitas	NM	87043
Alan	Friedman		Placitas	NM	87043
Laurie	Smith Geuner		Placitas	NM	87043
Daisy	Kates		Placitas	NM	87043
Jerry and Janice	Saxton		Placitas	NM	87043
Damin	Anderson		Placitas	NM	87043
Orin	Safier		Placitas	NM	87043
Cynthia	Walker		Placitas	NM	87043
Bert	Miller		Placitas	NM	87043
Neva	Denny		Placitas	NM	87043
Kathy	Friedman		Placitas	NM	87043
Tom	Walker		Placitas	NM	87043
Joy	Price		Placitas	NM	87043
Linda	Schmidt		Placitas	NM	87043
John	Verdugo		Placitas	NM	87043
Eileen	Romero		Placitas	NM	87114
Anne	Frost		Placitas	NM	87043
K.	Collins		Placital	NM	87043
Rick	Burnley		Placitas	NM	87043
Darlene Komorous and Robert	Smelana		Placitas	NM	87043
Ken and Barbara	Longeway		Placitas	NM	87043
Jim and Sharen	Masterson		Placitas	NM	87043
Karen Crane and Mark	Conner		Placitas	NM	87043
Mark and Pam	Suazo		Placites	NM	87043
Deborah and Tim	Nadeau		Placitas	NM	87043
Carol	Rushton		Placitas	NM	87043
Eraua	Weu Elle		Placitas	NM	87043
Mark	Dankert		Placitas	NM	87043
Nora	Caldwell		Placitas	NM	87043
Bill	Turner		Albuquerque	NM	87104
Gary	Libman		Placitas	NM	87043
Joan	Pacioletty		Placitas	NM	87043
Joan	Fewcle		Placitas	NM	87043
Joss F.	Martinez		Placitas	NM	87043
Frank	Larsen		Placitas	NM	87043
Frank	Hawks		Placitas	NM	87043
Judith	Hendry		Placitas	NM	87043
Suellen	Gornall		Placitas	NM	87043
Diane	Likewise		Placitas	NM	87043
Barbara B.	Morrison		Placitas	NM	87043
Doris	Franklin		Placitas	NM	87043
Ed and Jessie	Newville		Placitas	NM	87043

Ruyo	McColloch		Placitas	NM	87043
Susan and Ash	Caelers		Placitas	NM	87043
			Placitas	NM	87043
Joan	Lauelee		Placitas	NM	87043
			Placitas	NM	87043
Ms.	Skeens		Placitas	NM	87043
Ron and Carol	Horner		Placitas	NM	87043
Ann	Rustebakle		Placitas	NM	87043
Ty and Barb	Belknap		Placitas	NM	87043
Leland	Bowen		Placitas	NM	87043
Fran and Len	Stephens		Placitas	NM	87043
Sally	Blanton		Placitas	NM	87043
Lisa	Ceniceros		Placitas	NM	87043
Joan	Curney-Enciso		Placitas	NM	87043
Judy	Kuscus		Placitas	NM	87043
Debby	Brinkerhoff		Placitas	NM	87043
Gaett and Joan	Leon		Placitas	NM	87043
Robin	Brandim		Placitas	NM	87043
Peter M.	Pino		Zia Pueblo	NM	87053
Dannette	Salazar		Placitas	NM	87043
Charles	Mellon		Placitas	NM	87043
Karl	Wiese	Sandoval County	Bernalillo	NM	87004
Max	Libby		Las Vegas	NV	89107
David	Romero		Albuquerque	NM	87114
Will	Ouellette		Placitas	NM	87043
Don	Robertson		Placitas	NM	87043
Frank	Cangiacoz		Albuquerque	NM	87015
Roger	Poore		Bloomfield	NM	87413
Colleen	Vaughn		Santa Fe	NM	87113
Jerry	Miller		Placitas	NM	87043
Lolly	Jones		Placitas	NM	87043
Dawn	Wolf		Placitas	NM	87043
Nancy	Hawks		Placitas	NM	87043

Bloomfield, New Mexico January 17, 2002

Dave	Kelsoe	E.A. Renfroe Co.	Houston	TX	77042
Henry	Sanchez		Farmington	NM	84499
Jerry	Crockford	BLM	Farmington	NM	87401
Eugene	Gorman		Kirtland	NM	87417
Neil	Jones		Cortez	CO	81321
Zang	Wood		Flora Vista	NM	87415
Don	Looney		Kirtland	NM	87417
Bill	Papich	BLM	Farmington	NM	87401
Barney	Wegner	BLM	Farmington	NM	87401
Mary Jo	Albin	BLM	Farmington	NM	87401
Mark	Catron		Bloomfield	NM	87413
Bob	Stannard		Farmington	NM	87401

Jane	Singer		Farmington	NM	87401
DeWayne	Albin		Farmington	NM	87401
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Steve	Nelson		Farmington	NM	87402
S. A.	Barry		Aztec	NM	87410
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Darold	Stephenson		Jal	NM	88252
Dewayne	Jennings	Jal Council	Jal	NM	88252
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Bryan	Henderson		Odessa	TX	79762
Aubrey	Hobson	City of Kermit	Kermit	TX	79741
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Diane	Dominguez	Ector County Abstract	Odessa	TX	79761
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Ricky	Cronk	EZ Pipeline Padding	Odessa	TX	79760
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WRITTEN COMMENTS

1. Nancy Hawks

Placitas, NM

No Date—Comment Card

I feel the pipeline is unsafe. I do not feel-trust that the pipeline company will correct any defects they find. This behavior was demonstrated in the state of Washington. The transport of flammable products would impact the safety of our children, our seniors, parents, everyone in Placitas. It affects us the possibility of a leak and contamination of our groundwater and of course-our property values. I do not feel the BLM has the expertise to handle this issue properly or fairly.

2. Vivian D. DeLara

Placitas, NM

No Date—Comment Card

I totally oppose. It does not matter how many statistics you give us, it's like living near a time bomb. Something needs to be done and very soon.

3. Frank Hawks

Placitas, NM

No Date—Comment Card

A pipeline built to 1950's standards with longitudinally welded seams cannot be safe by any means. Reversing the flow with a fluid that is of a much lower viscosity through this pipeline screams out that there will be a high amount of leakage and danger to the community. This pipeline should be replaced totally or reroute, leaving the old pipe abandoned in place, causing as little as possible damage to property that it runs through.

4. P. Urioste

Placitas, NM

No Date—Comment Card

After the Carlsbad disaster, I believe the pipeline should be moved or replaced! We have many children here daily, as well as parents and staff. Our children walk through the arroyo to the babysitters home. The pipes are exposed and the children walk on top of the pipes—our playground and school are sitting next to the pipeline.

5. No Name Given

Placitas, NM

No Date—Comment Card

The old pipeline cannot be safe. It goes by the school. Under no circumstances should it be used. If a pipeline is needed thru here it should be a complete new installation.

6. No Name Given

Placitas, NM

No Date—Comment Card

With safety demonstrated by the present pipeline operators they should not be allowed to operate the pipeline.
If they are allowed to operate the pipeline they should be required to replace all the pipe in the vicinity of Placitas with new, new pipe.

7. Marianita P. Romero

Placitas, NM

No Date—Comment Card

I am against the pipeline because I am afraid it will have an accident. I go to the Placitas Senior Center every day.

8. Gary S. Shellhorn

Placitas, NM

No Date—Comment Card

Dear Mr. Jaramillo,

As a property owner with a house about 300 yards from the pipeline running through Placitas along Camino de Las Huertas, I am not adverse to the continued use of the pipeline to transport petroleum products. It was here before I bought the property and I was fully aware of its existence when I purchased my land.

I lived for several years within a few hundred feet of a jet fuel pipeline in Nevada. The pipeline did not cause problems nor did it leak. I relied on groundwater from a relatively shallow well for my domestic supply, like I do here in Placitas and like many of my neighbors. One advantage of an active pipeline with new monitoring systems and leak detection equipment is that leaks can be located and fixed before large volumes can escape.

If Equilon is forced to abandon the pipeline because BLM will not renew the ROW, the pipeline will not be maintained, it will deteriorate and residual petroleum products could leak out and become a source of long-term pollution. Removal of the pipeline would cause extensive land disturbance, create adverse visual impacts, and be a source of accelerated erosion.

I believe BLM should evaluate all the potential risks and hazards associated with the continued operation of the pipeline, develop appropriate safeguards, monitoring requirements, and incorporate those safeguards and requirements as stipulations to the ROW. I would urge BLM to obtain assurances, prior to the issuance of the ROW, from the appropriate federal and state regulatory agencies responsible for pipeline safety and operation to closely monitor Equilon's operations in the Placitas area.

I am concerned with what Equilon would do with the existing compression/pump station and the surrounding land off of Camino de Las Huertas if they are denied

continued use of the ROW and pipeline. I would like those issues and potential environmental damage associated with pipeline removal addressed in the No Action alternative.

Thank you for the opportunity to comment on the proposed ROW renewal. I would like to be placed on your mailing list for this project.

9. Frank J. Jerabek

Placitas, NM

No Date—Comment Card

Three factors are significant to me in considering this pipeline project: (1) the age of the pipeline; (2) the inherent danger of pipelines; and (3) the track record of the company that is proposing this project. This pipeline is 50 yrs old, and fully depreciated. Construction standards, methods and materials have changed significantly since it was built. Regulations and requirements have become more stringent. These changes argue for rebuilding the pipeline in developed areas. Pipelines are inherently dangerous if a leak develops. Witness the Carlsbad and Washington accidents! This factor argues for rebuilding the pipeline in developed areas. The track record of the company proposing this project includes the Washington state disaster which included significant procedural breakdowns. This factor argues for rebuilding the pipeline in developed areas. Therefore, the only circumstances under which I would accept this project is if the pipeline were rebuilt in developed areas.

10. Judy Suiter

Sandia Park, NM

No Date—Comment Card

1. Please address how the integrity of the line of the proposed pipeline project will be ensured. How will testing be done, how often, and what types of things will be checked, tested for, and how testing will occur.
2. What needs to happen to make the existing pipeline operable? Address safety issues regarding this.
3. Address noise, odor, vapors, and how these will be avoided completely.
4. Compare the proposed use product with other products and compare the safety records.
5. What happens if Equilon decides to sell their ownership rights to this line? Is there a timeframe where the life of this project ends? Is it good for 20 years? 50 years? Explain and justify this.
6. Are there any additional facilities such as lift stations, pump stations, etc. that will need to be constructed along the route? Where?

11. Patricia Oshel

Placitas, NM

No Date—Comment Card

Do not allow volatile fuels to be transported through any pipeline older than 10 years unless it has been continuously used for this purpose & inspected & maintained ROUTINELY to ensure safety. The pipeline through Placitas is too

old, has not previously been used for volatile fuels, has not previously been used for volatile fuels, has a history of leaks, cannot be adequately and thoroughly inspected and needs to be REPLACED in populated areas. Please ensure public safety by NOT allowing transportation of volatile fuels through this pipeline.

12. Janice M. Marmo

Placitas, NM

No Date—Comment Card

As a homeowner and employee of Placitas Elementary, both of which are located above your pipeline, I am appalled at even the mention of using this pipeline again!

No promises or guarantees you can offer will every stop the danger to our families and children. We may be a small community but not ignorant to your unjust greed. Move on to another area where you'll know in your heart Mothers, Fathers and Children will NEVER be affected—Whether by personal harm or deflating property values.

When your pipeline was built—NO ONE lived in this area—Now hundreds of families do! What don't you people get about this? Buy my house and see if you'll be able to sleep at night!

13. Harriet Shaw

Placitas, NM

No Date—Comment Card

Honor us the rightful decisions as the citizens of Placitas of the Sandoval County. Remember the Carlsbad Tragedy.

14. George F. Koinis

Albuquerque, NM

March 1, 2002-Comments Dated

Dear Mr. Jaramillo:

My wife and I live in Placitas in the Cedar Creek subdivision. My home is in proximity to the referenced pipeline. I am extremely concerned with Equilon's proposal to use this old pipeline to transport very volatile substances for which the pipeline was not designed to carry. I am in favor of requiring Equilon to replace the pipeline in all High Consequence Areas affected by the pipeline, notwithstanding any temporary disruption such construction might entail. In the long run, the public safety will be enhanced which, in my opinion, should be BLM's first and highest priority. For those of us who live in proximity to this pipeline, we look to you and BLM to ensure as safe a pipeline as possible.

15. Don and Ann Dougherty
Albuquerque, NM

March 1, 2002—Comments Dated

Dear Mr. Jaramillo, Project Manager:

First, we want to thank Danita Burns, BLM public affairs officer, for giving us your email address as it would serve as well in submitting comments to you about the reopening of the Equilon pipeline. However, as the email address turned up with a delivery failure, we are instead using this letter to make the following comments as concerned citizens who live in close proximity of the proposed pipeline and tank farm south of Moriarty, adjacent to State Rt. 41.

Before we get into our main concerns, we want to stress that we are not against their locating in Torrance County. However, we do want the m to put the safety and welfare of New Mexico citizens and our environment first and their bottom line last. After all, they are a billion-dollar corporation with the resources to do this project responsibly.

A lot has happened since we first attended those initial Equilon meetings two years ago, in Moriarty. First, the tragic deaths in Carlsbad from a pipeline explosion, and also the deaths and massive environmental damage in Bellingham, Washington due to a pipeline. Secondly, Torrance County is one of the fastest growing counties in New Mexico while remaining one of the poorest. So, we have more people to be concerned about without any increase in infrastructure to handle any of the possible consequences associated with such a project: ground water contamination, fire risk, air pollution, traffic problems, etc. Based on these real possibilities our concerns have deepened and are now focused on the following:

- **PIPELINE SAFETY!** Equilon will be using an already aging pipeline that wasn't designed to carry the more volatile fluids they intend to move through it. It is reasonable to assume that such an old pipeline will be precariously more prone to breaks and leaks regardless of the pretesting results and ensuing repairs Equilon intends to carry out. Please consider that corrosion is the biggest single cause of pipeline releases. The integrity of the old pipeline at the time of the test does not take into account its imminent future reliability. The degradation of material and components has been ongoing since its original construction and, of course, its functional lifespan is less dependably predictable in comparison with a new pipeline given the advances in manufacturing technology since the original was built. Therefore, the total environment, along with the residents, throughout its path will be placed under much greater and undue risk if Equilon is not required to install a new pipeline. Evidently, the present Federally mandated regulations overseeing pipelines are lamentably inadequate as, according to the GAO, approximately four major pipeline accidents occur each week and they are increasing by 4% annually. Senator Patty Murray stated that since 1986 there have been 325 deaths with an average of 6 million gallons of hazardous material spilled yearly and \$850 + million in environmental damages due to pipeline

accidents. Therefore, the impact of this project as presently planned will almost certainly prove disastrous to the environment and the residents.

The prevention of an environmental disaster will depend upon requiring Equilon to accept liability for leaks, explosions and fires while at the same time insisting upon their utilizing the most current technology and materials to prevent corrosion and to detect and repair leaks.

- FIRE! We have no fire hydrants to use to fight a fire. Some wells in the area may not be able to supply enough water to fight a major fire. We have a volunteer fire department and are thankful for the volunteers that provide this service, but there are limitations as to what they can do in the face of an explosion/fire type incident. Equilon has promised to put in a hydrant at the corner of their property at A095 and Rt. 41. It may take care of damage to their property, but who is responsible for protecting adjacent private property from damages due to any pipeline/facilities fire or explosion? Equilon must be required to provide for the adequate and sustained fire protection of the environment and property throughout the course of its pipeline and associated pumping stations and tank farms. Further, Equilon should provide first class equipment to local fire stations and in-depth training to the volunteer fire fighters at these stations.

We're not experts, so we are depending on you office, Bureau of Land Management and the EPA to protect our land, water and air from pollution. Remember Equilon can pick up and move on, but the rest of us are still here. Please do not compromise on these important issues.

In closing, we wish to thank you for your time and consideration. We also urge you to do the right thing, as we are sure you will.

16. Rick Burnley

Placitas, NM

March 1, 2002—Comments Dated

Dear Mr. Jaramillo,

I'm writing to you in vigorous protest against the proposed pipeline plans that affect Placitas. It was obvious that there was virtual unanimity among Placitans that this is a bad and dangerous idea, when the local hearing was held.

I'm a landowner and the pipeline runs across the edge of our property and after what occurred in Carlsbad N.M. and Bellingham, Washington we have little faith in Equilon's capacity to prevent more disasters of this type. Even a small, undetected leak could cause horrific results with the aquifer that supplies our wells.

When the pipeline was first installed this was a rural area with a small population, but this is no longer the case. As you know, the line goes past the elementary school and the senior center.

I have read that some pipeline wall thickness has been reduced over time to in some places up to 50%, but Equilon doesn't deem it necessary to replace the line, showing their willingness to play poker with our lives.

Let the present line remain unused, and if another one needs to be installed, let it be in a sparsely populated area.

17. Kerry Sturgis

Albuquerque, NM

March 1, 2002—Comments Dated

Mr. Jaramillo,

I urge the BLM to recommend “no action” for the Equilon Pipeline Project and stop this ill-advised project.

I live in the Fox Hills subdivision of Sandia Park. The pipeline passes within 100 feet of my neighborhood’s community well. A leak in the gas pipeline would be catastrophic for my neighborhood. If our well becomes contaminated, our property values would be ruined. I cannot afford the adverse economic impact of that eventuality.

Our neighborhood has one main access road. The pipeline passes under our road in several places. A fire or explosion of the pipeline would likely result in injury or death for anyone in the area when it occurred. All of us in the neighborhood use the road several times a day) several hundred “person-transits” per day. This is a risk I am unwilling to assume.

18. Debbie Andrews

Placitas, NM

No Date—Comment Card

The population of Placitas is only increasing, thus increasing the pipeline risk.

Spend some dollars for safety and find an alternate route. \$\$\$ There is no room in N.M.

19. Douglas Johnston

Albuquerque, NM

February 28, 2002—Comments Dated

Dear Mr. Jaramillo,

I am writing with regards to the proposed Equilon Pipeline plan that will be affecting the Estancia Valley. Moriarty Municipal Schools expressed, during the public hearings on the tank farm, our grave concerns with the increased volume of traffic, especially tanker truck traffic, that this project will generate. The portion of Highway 41 that will be used by these tanker trucks is the same stretch used

by **all** the district school buses. Traffic in the mornings, at present, is particularly bad now and adding to that volume, especially with trucks hauling hazardous liquids is not good.

Our school buses start their routes at 6:30 am and finish the morning routes around 9:00 am. In the afternoon, routes begin at 2:00 pm and do not finish until around 6:00 pm. ANY accident involving one of these tankers would be bad enough; an accident involving a school bus would be catastrophic.

I am asking that the Moriarty Municipal School's concerns with the increased traffic generated by this tank farm and the attached pipeline be addressed when the environmental impact study is done on this project

20. Suzanne Kryder

Placitas, NM

March 2, 2002

Dear Mr. Jaramillo,

This letter is regarding the proposed pipeline project by Equilon through Placitas. My husband and I live across the street from this pipeline. Due to the poor safety record of Equilon, I have a lot of fear about their use of the pipeline without adequate safety precautions. I would much rather have the land in front of our own house dug up to install new pipe than blown up by an accident. The pipe is very old, and the testing they are proposing is inadequate. Please do not allow them to simply refurbish the existing pipeline.

22. Elaine Slusher

Placitas NM

Comments dated February 27, 2002

Dear Mr. Jaramillo,

I do not think a nearly 50 year old pipeline can safely carry volatile fuel through the village of Placitas.

As a senior citizen I am especially concerned because the pipeline goes under the parking lot of the Senior Center. I urge you to replace the pipeline near all populated areas.

23. Elizabeth L. Lorenz

Albuquerque, NM

Comments received March 7, 2002

I am writing to express my concern about the reopening of the Equilon pipeline. I can understand that a company, which runs hundreds, if not thousands, of miles of pipeline, will look at leakage issues differently than an individual homeowner or a small community that is interested in only a few miles of it. My biggest concern is that Equilon won't take seriously the tiny leaks that they consider negligible.

Those same leaks, however, would be enough to ruin a homeowner's water

supply or create enough leaking gas to cause an explosion, which might kill someone.

In Edgewood, the pipeline will run directly through an area that soon will be developed as a community center, next to an elementary school. This pipeline has to be replaced using our most modern technological information concerning pipelines, corrosives, oil and gas chemistry, etc.

Since my husband works in the oil and gas field, I am aware that the oil technology of 50 years ago has long been replaced by improved, more environmentally friendly technology. What was considered safe then has long been proven otherwise. Please weigh the desires for an “easy fix” with the long-term needs and safety of our community.

24. Tom and Sally Blanton

Placitas, NM

No Date – Comment Card

I live at 36 Camino de las Huertas (good ol’ “Pipeline Rd.” 10 years ago). The pipeline in question is about 30 ft. from our property line and about 150 ft. from our residence. We are opposed to this pipeline carrying diesel products, or anything, for that matter! The potential for a leak or explosion causes us great concern. We endorse moving the pipeline to the north of the populated areas of Placitas. I attended the public hearing held at Plac. Elementary and echo the opposition you heard from everyone at that meeting.

25. Joan Cutney

Placitas, NM

No Date – Comment Card

We do not want the pipeline to go through Placitas under any circumstances (UNLESS it is totally replaced by new pipe) due to the danger of explosion, land and ground water contamination.

26. Alvano Euciso

Placitas, NM

No Date – Comment Card

NO pipeline in Placitas. It serves NO purpose to the people of NM and will be used as a conduit for fuel that it was NEVER designed to carry.

We do not want to be blown up or have our wells or ecology destroyed.

27. Carol and Ron Horner

Placitas, NM

No Date – Comment Card

The present pipeline crosses Orno Creek above ground just upstream from our home. If the present pipeline is used for petroleum products, we will never feel safe again. The acceptable alternatives are replacing the pipeline through Placitas, renovating the pipeline around Placitas or “No action.”

**28. Darlene Hansen/ Loren Hansen
Placitas, NM**

No Date – Comment Card

Nobody wants the pipeline in Placitas!!

It goes past the village, the elementary school and all of our homes as well as the community center.

It is too dangerous to use for volatile fuels and has passed its useful lifespan. No one will profit from using the line as is except the oil companies involved and Placitas risks total ruin.

**29. Jan Ravenwolf
Sandia Park, NM**

Comments dated March 3, 2002

Dear Mr. Jaramillo,

Thank you for this opportunity to express my great alarm at the prospect of Equilon Pipeline Company transporting highly volatile substances through a 50-year old crude oil pipeline.

This pipeline, as you may discern from my address, runs on an easement across my property, at its closest about 100 yards from my house. I was reasonably comfortable when crude oil coursed through the pipeline. Gasoline and aviation fuel are an entirely different matter. The recent, disastrous explosion of an old pipeline in the southern part of the state cannot be ignored.

My property is at approximately 7000 feet. I understand these highly flammable substances are coming up from sea level at pressures up to 600 psi, presumably expanding all the way up here against ancient sidewalls. Sounds like a recipe for disaster to me.

When the pipeline was first installed, human habitation along the still highly visible scar was sparse. Now we have lots of people living on the land it crosses. So we can look forward with great trepidation to the specters of pollution, forest fires and explosions in now fairly populous areas—not that these threats were acceptable for the local wildlife before the people moved in!

As we were told at the January 15 scoping meeting in Moriarty, air inspections and “smart pigs” could protect us from calamity. But we also extracted the information that those pigs, and those airplane pilots, aren’t so vigilant after all—certainly not enough to detect volatile leaks, and even a backhoe parked on the pipeline!! And Equilon has no method for early detection of small leaks.

Would you want to live in this atmosphere of impending doom? Unless things change drastically, I strongly urge you and the BLM to recommend “No Action,” and stop this project.

Thank you for your kind attention to this matter of crucial importance to those of us who feel like we have our heads strapped down on Equilon’s Pipeline Guillotine.

**30. Michael Newman, Melody Childs, and Mary Pruess
Sandia Park, NM**

Comments dated March 1, 2002

Re: New Mexico Products Pipeline Environmental Impact Statement

Dear Mr. Jaramillo,

We are residents of the Fox Hills neighborhood of Sandia Park, NM. We are members of the Monte Largo Road Maintenance Association and are in concurrence with their views about the proposed change in the operation of the above-mentioned pipeline.

Water is a major resource in our area and the neighborhoods supply has been very reliable. The thought of "missing" a small leak, which would result in the contamination of our water supply, is a great risk to live with.

Old pipelines make the news in New Mexico on a regular basis. A gas pipeline in Santa Fe that blew up an office building. The family down south that went fishing. It comes down to old pipes and continued use. To increase the pressure for these old pipes is asking for trouble.

We strongly oppose the NM Products Pipeline project as dangerous to our community and to the environment.

**31. Robert Pine
Albuquerque, NM**

Comments faxed March 1, 2002

Re: Equilon Pipeline

Dear Mr. Jaramillo:

I wish to comment on the proposal by Equilon Pipeline Co. to reactivate the pipeline running through various East Mountain communities in order to transport fuels. I am strongly opposed to this proposal for the following reasons:

When this pipeline was originally constructed, over 40 years ago, the areas through which the pipeline ran were very sparsely populated and, thus, didn't appear to pose a health or safety threat. 40+ years later, the area is home to a significant and growing population. The pipeline runs right through the middle of the Paa Ko development and through the proposed Cambell Ranch development where they are proposing more than 4000 homes. It is also very close to Sandia Knolls where I live.

Being more than 40 years old, this pipeline is almost certainly going to leak due to corrosion and failing welds. Any testing done on this pipeline is not likely to catch smaller leaks. Over time, small leaks can result in substantial amounts of contamination. This pipeline runs over the Madera Formation which consists of fractured limestone. Such a formation readily transports contaminants down to groundwater. An excellent example of this in the East Mountains is the old Woody's Truckstop contamination site on Old 66. Several hundred feet of

Madera limestone lies between the ground surface and groundwater. High levels of groundwater contamination exist below the old gas station, though no leakage was ever detected while the truckstop was in operation several years ago.

Sandia Knolls has its water supply wells fairly close to the pipeline. These wells supply water to the hundreds of residents of Sandia Knolls. Though it's not currently known what the capture zone of these wells, there is high likelihood that it extends out to below the pipeline. Any leakage in the pipeline within the capture zone of the Sandia Knolls wells could destroy this essential water supply.

In addition to the Sandia Knolls water supply wells, there are numerous homes with domestic water supply wells within a mile of the pipeline.

Considering the recent tragedies involving exploding pipelines in New Mexico and Washington it would be utterly irresponsible to allow pipelines that transport explosive fuels in residential areas. This pipeline not only runs right through existing and planned residential areas, it also runs near schools, community centers and various commercial establishments.

Recently, a federal grand jury alleged that Equilon was guilty of felony disregard of safety regulations and procedures, and failure to make required repairs to the pipeline that eventually ruptured, leaking fuel into a creek in Bellingham causing an explosion and the deaths of three people. This is not a company that should be managing pipelines in residential areas.

Please address all of these issues in the EIS that is being prepared for this project.

32. Bill Maguire
Albuquerque, NM
Comments dated February 27, 2002

To Whom It May Concern:

The Board of Directors of the San Pedro Creek Estates Homeowner's Association represents some 300 landowners in a subdivision through which the Equilon pipeline runs.

We would like to express our concern with the current plans to run a more volatile fuel in the existing pipeline. Given the proximity to our homes we do not feel that the current assurances of technological safety and oversight are adequate. We feel that more independent study and input of the affected parties is indicated.

33. Jan C. Wright
Sandia Park, NM
Comments dated February 27, 2002

Dear Mr. Jaramillo,

I just wanted to put on record my objection to the Equilon Pipeline project in the East Mountains of New Mexico. That pipeline runs less than a mile from my

house, so I consider my neighborhood to be in danger from it. As the explosions that have happened recently in Bellingham and in Southern NM show, this company does not do well at keeping their pipelines running safely. They can offer up all the verbal assurances they want, but their records show otherwise. This is a very old pipeline and it would need extensive work to replace the corroded sections to make it come up to safety standards. I see no reason to allow this danger on public lands, where innocent people could be hurt while out enjoying themselves, nor on private lands, where we all should have some rights to protecting ourselves and our property. No one needs this pipeline except Equilon. We've been doing just fine without it. Why start it up again now?

**34. James McGrath
Edgewood, NM**

Comments dated February 27, 2002

Dear Mr. Jaramillo:

I would like to make some comments about the proposed Equilon pipeline. I read about the location of this pipeline in the January 10, 2002 edition of the East Mountain Telegraph. I discovered that this pipeline corridor is about ¼ mile from my home in Edgewood, NM. According to the newspaper the proposed pipeline will carry refined petroleum products, which, according to the newspaper, would include "gasoline, diesel, and jet fuel."

Recently, I checked out the location of the existing pipeline near my home. The old pipeline essentially passes directly through a residential area in Edgewood—from Church Road across Capitol Road and then across Range Road. The pipeline passes through the yards of several homes. Apparently, homes have been built around the old pipeline. In fact, the pipeline corridor itself is the yard of one mobile home directly east of Capitol Road. I observed a horse trailer and a car sitting right on top of the pipeline corridor. The pipeline also passes within 30-50 meters of a Day Care Center on Church Road.

It is my opinion that this section of pipeline as well as any other section of this pipeline passing through residential communities. As I understand it, the pipeline originally carried "crude oil," which I suspect is far less dangerous than the finished products. I, therefore, seriously question whether this pipeline is adequately safe for carrying materials far more dangerous than the materials for which the pipeline was originally designed. I believe that Equilon should demonstrate that the welds and other features of the pipeline are sufficient to prevent explosions or environmental leakage to the ground. If the pipe needs to be upgraded, then Equilon should take necessary actions (strengthen welds, replace pipe, etc.) to prevent explosions, fire and environmental damage. Above all, this pipeline should be re-routed outside residential communities.

**35. Susan Protiva and Mark Spear
Cedar Crest, NM**

Comments dated February 28, 2002

Dear Mr. Jaramillo:

We are writing in response to the Equilon Pipeline Company's proposal to pump fuels through the East Mountain area. We are landowners in the Puertecito area, and live within sight of the pipeline. Our concerns and objections to the pipeline are as follows:

- 1) This is an outdated pipeline, and was not designed for the higher pressure required to pump the fuels Equilon is now considering. In our five years in this area we have never once witnessed any pipeline employees inspecting or doing maintenance work on this pipeline. There are exposed sections of pipe crossing arroyos very near to our house, and we feel this poses a risk for us and our children. Considering what occurred in Carlsbad, I do not feel this is an unfounded or exaggerated fear. Studies of pipelines in our region, in the wake of the Carlsbad explosion, revealed the appalling state of neglect and decay these pipelines are in and the hazards they pose for the populations they run through.
- 2) We use well water for our drinking, household, livestock and landscape needs. Gasoline, diesel and aviation fuels contain many hazardous constituents that pose a risk to human and ecological health, and there is no EIS or risk assessment that can guarantee these fuels won't be leaking into our groundwater.
- 3) The pipeline cuts through one of the few year-round streams and riparian areas in this vicinity (a portion of San Pedro Creek) and is already a grave insult and endangerment to this fragile and beautiful ecosystem. Any expansion or 'improvements' done to the pipeline will further degradate the area. The approval of the original pipeline severely undermined the scenic value of San Pedro Creek and the Hagen Basin, but in the years since its installation the public's value of open space and undisturbed public lands has markedly increased, and with it the BLM's responsibility to protect these lands for us and future generations.

**36. Susan Dayton and Miles Nelson, M.D.
Sandia Park, NM**

Comments dated February 27, 2002

Dear Mr. Jaramillo:

We are writing in response to the Equilon Pipeline Company's proposal to pump fuels through the East Mountains.

We own property approximately 3 miles from San Pedro Creek Estates in the Puertecito area where we built a house 2 years ago. Like most people in this area we utilize well water for our family's needs, pets, livestock, garden and orchards. We wish to keep this area as pristine as possible, as long as possible. We oppose the pipeline due to the following:

- 1) It is an existing pipeline with many years of use being proposed for transport of these fuels;
- 2) Gasoline, diesel and aviation fuels contain a number of hazardous constituents that pose a risk to human and ecological health, the environment and our precious groundwater reserves in the East Mountains;
- 3) An act of “terrorism” or accident involving any such pipeline could have devastating consequences for our area.

37. Sydna Allen

Placitas, NM

Comments dated February 27, 2002

Dear Mr. Jaramillo,

While I attended the Placitas meeting and made my thoughts known, I will reiterate my opinion. I feel much more study needs to be done, i.e., the safety of the welds and deterioration of the pipe itself. Also it is imperative to have double lines in the vicinity of people and homes. Even one life lost is too many. Also it must be environmentally sound to save our precious land.

I have no objection to ground transport as long as it is done safely and every fragile need clearly cared for.

38. Adrian Mellear (?) and Linda Shedd

Sandia Park, NM

Comments faxed March 1, 2002

In preparing the Environmental Impact Statement on the Equilon Pipeline Company's plans to pump gasoline, diesel and aviation fuel through an old pipeline crossing the East Mountain Communities, please consider the impact on these and surrounding communities. Our environment, water and property values are at risk. This pipeline runs through our forests, past our homes and across our groundwater supplies. We have serious concerns about the potential risks posed by this project.

39. Mark Rolfson, David Paoletta, Martha James and Jane Ann Lunn

Albuquerque, NM

Comments dated February 10, 2002

Re: New Mexico Products Pipeline Environmental Impact Statement

Dear Mr. Jaramillo:

The officers and members of the Monte Largo Road Maintenance Association appreciate this opportunity to raise grave concerns regarding Equilon Pipeline Company's proposed new use of a 50-year old crude oil pipeline to transport refined petroleum products. Our association is comprised of 30 households in the Fox Hills neighborhood of Sandia Park, NM.

This pipeline project poses serious threats to water, environmental, visual, socioeconomic, and transportation resources, and is unworkable unless these risk factors can be alleviated to the satisfaction of all impacted communities.

Water resources: The pipeline crosses our aquifer within 100 feet of our community well. Equilon representatives state that their only detection method for "small leaks" (e.g., 50-60 gallons per hour) is to test our well water periodically for contamination. This is unacceptable; by then the damage is done. Water is far too precious in the west. Our community cannot tolerate any increased risk to our supply.

Environmental resources: This is a proposal to pump large volumes of highly volatile flammable chemicals from sea level to 7000 feet at pressures up to 600 psi through an aging pipeline, passing through western forests and populated areas. Pollution and catastrophic fires are very real dangers.

Visual Resources: Equilon could eliminate dangers posed by the old pipeline by removing and replacing it, or installing new pipeline along the route. This is an unattractive alternative for them due to cost; it's unthinkable for us because of the long-term damage that would result. The original pipeline project made a scar 30 feet wide through our pinon-juniper woodland; a space now punctuated by occasional trees up to 8 feet tall that have grown back in the last 50 years. New excavation would destroy the slow revegetation process.

Socioeconomic resources: One-third of the households in our community—and several undeveloped lots—are located along the pipeline easement. Our road system crosses it several times. Our community well is adjacent to it. Therefore all of the risks and issues associated with the Equilon project pose a threat to property values in Fox Hills.

Transportation Resources: Equilon's project manager maintains that pipelines are the safest way to transport petroleum products. "You don't want to move the fuel in trucks," he said at the January 15 scoping meeting in Moriarity, NM. Yet, by his own estimate the proposed Moriarity transfer station will cause an additional 50 to 100 tankers a day to be driving Interstate 40 east of Albuquerque. This stretch of interstate highway is already clogged with large trucks and commuter traffic, and winter weather causes such hazardous driving conditions in this area that the state police often close the road during storms. All

local commuters using this route should be very concerned about this daily upsurge in truck traffic.

Human health and safety: The pipeline originally passed through sparsely populated or uninhabited land. Now, there are many communities, houses, and schools along its route. This project raises significant human health and safety risks without adequately addressing them. Equilon's safety measures are simply not good enough. They propose to use "smart pig" technology to detect flaws in the 400 miles of old pipe, but even if this method were 99% accurate (which it is not), then the "pig" would be wrong about conditions in 4 miles of pipe! Equilon employs small aircraft to fly the pipeline weekly to visually detect leaks and signs of construction or excavation in the easement. With a crude oil pipeline this might work, but it is difficult to see a gasoline leak from the air—fuels can volatilize without leaving visible signs. As for signs of construction, Equilon representatives in Moriarity were unhappy to hear that one of our residents had parked his backhoe in the pipeline easement for an extended period and aerial surveillance pilots did not report it. The Equilon engineers asked him to call and report this himself the next time it occurred. They told him they sometimes park construction equipment on the pipeline themselves to test the pilots. In other words, Equilon asks us to trust the aerial monitoring, but they themselves do not. The implications are sobering. Many construction projects have occurred along the pipeline easement in the past 50 years. Equilon tells us that corrosion from construction damage is the primary cause of small leaks, aerial surveillance doesn't find all the construction, the "smart pig" can't detect all the damage, and Equilon has no early detection method for small leaks.

In summary, we strongly believe that the risks posed by the New Mexico Products Pipeline project far outweigh its potential rewards. In the current circumstances, we urge the BLM to recommend "No Action," and stop this project.

40. Albert and Denise Webb

Sandia Park, NM

Comment dated February 26, 2002

To whom it may concern:

We are writing to express our concerns regarding the proposed reopening of the Equilon pipeline through the East Mountain area. We are residents of San Pedro Creek Estates, a subdivision off Highway N-14, just inside Sandoval County. The pipeline runs approximately 350 feet from the back of our home along the edge of our property.

Because this pipeline is uphill from our well, we are very concerned about the consequences of a potential leak on our water supply. We are also extremely concerned about the consequences from an explosion or other mishap with the pipeline. Has, or will, a probabilistic risk assessment be done to assess the possibility of fatality or casualty from an explosive mishap along this pipeline? Can someone in your office tell us if we are far enough away from the pipeline to be safe in the event of an explosive mishap? How will we know if there is a leak? Will periodic tests be done to insure leaks aren't occurring or will there be some

type of monitoring equipment along the pipeline to detect for leaks? Will the entire length of the pipeline be inspected before it is reopened?

We appreciate your time and attention to address these concerns.

**41. Lynn M. Wartick
Sandia Park, NM**

Dear Mr. Jaramillo:

I would like to take this opportunity to express my concern about the intention of Equilon Pipeline Company to pump fuel through an aging pipeline system in the East Mountains.

I am a recent escapee from progress in Phoenix, Arizona. When I moved there 23 years ago, it looked like Albuquerque today. Now, through a never-ending onslaught of corporate beneficence, it has acquired the appearance of east Los Angeles. I am certain that this company, like its predecessors in the Phoenix area, has outlined numerous benefits to be gained from allowing it to risk the beautiful and fragile environment of this area. Whatever they have promised is not worth it.

I realize that the Bureau of Land Management is not the Bureau of Land Preservation. But, please, consider that once the water table is polluted it will never be the same here. We won't be able to use our wells or, perhaps, sell our homes. We didn't move here for cheap gas or high paying jobs. We could have stayed in Phoenix for that.

**42. Brahna and Janusz Wilzinski
Sandia Park, NM**

Comment dated February 23, 2002

Thank you very much for the informative meeting in Moriarty on January 15, 2002 regarding the Equilon Pipeline.

Since the original easements for the pipeline were granted in the mid-1950's the use of the land in Bernalillo and Sandoval County has changed considerably. It is the belief of people in the Fox Hills sub-division of Sandia Knolls that were the pipeline to be built today, a different route would be chosen. However infrequent, bursts in petroleum and gas pipelines, whether gasoline or aviation fuel is being transported, result in an ecological as well as human catastrophe.

As you know, there is only one road in and out of Sandia Knolls. The only exit from the Fox Hills sub-divisions through the Knolls. The pipeline is less than 100 feet from many dwellings. The hill, rugged terrain would only heighten the spread of fire.

The Equilon Corporation proposes to add two extensions to the pipeline—one in Colorado, the other in Texas. We would greatly appreciate it if the BLM and the Equilon Corporation would at the same time address the question of relocating the existing pipeline. There are several reasons for relocating this pipeline: First is the present density of the population in this area and the proposed increase in density as more land is being developed. Second is that a new pipeline could be

constructed of new rather than currently stressed materials; it would hopefully be constructed of current, more technologically advanced and thus safer materials.

RELOCATION OF THE PIPELINE IS NECESSARY FOR THE PUBLIC'S SAFETY. Thank you very much for considering our input.

43. Mark Rolfson
Sandia Park, NM

Comment Dated February 23, 2002

Re: New Mexico Products Pipeline Environmental Impact Statement

Dear Mr. Jaramillo:

As a Sandia Park residential landowner, I want to convey my concerns about Equilon Pipeline Company's proposal to use the old crude oil pipeline, that crosses my four acres, to transport gasoline, diesel, and aviation fuel. I would prefer that the BLM recommend "no action" on this proposal and stop the project unless Equilon takes far more effective measures to guarantee the safety of our communities and our water. I think the most dangerous aspect of this project, for those of us living in this neighborhood, is the fact that the pipeline crosses our aquifer less than 50 yards from our community well. Equilon has no way of assuring that the old pipe is completely sound, and their only proposed method for detecting "small leaks" (if you can call 50–60 gallons per hour small) is to test our well water periodically for contamination. Once they find that their pipeline gas polluted our only drinking water supply, it could take years and lots of money to correct the problem—if it is even possible to fix. Meanwhile, what happens to us without a supply of drinkable water?

Fire danger is another big concern. What would happen if, say, aircraft fuel began seeping into the forest on a hot summer day anywhere close to a source of ignition? How much of the Cibola and surrounding neighborhoods might be lost?

Equilon could just dig up and replace the old pipeline or lay new pipe through the easement, but the expense and the long-term environment scarring make these poor choices. The land recovers very slowly from such disruption. Since the first pipeline project tore it up in the 1950's, all that has grown back on our easement are grasses, some shrubs, and a few scattered trees no more than ten feet tall. As a commuter, another concern I have is Equilon's estimate that 50 to 100 tankers a day will visit the proposed Moriarty transfer station, adding to the volume of large truck traffic on Interstate 40. This highway is already very busy, and suffers from dangerous driving conditions in the winter. Would you want to be on that road when a gasoline truck jackknifes?

Finally, Equilon's safety measures are not adequate. They do have small aircraft fly the pipeline looking for leaks and construction, propose to use "smart pig" technology to detect flaws in the old pipe, and plan to run electric current through the pipe to prevent further corrosion. However, these actions do not offer the levels of quality assurance and safety that we have a right to expect. One of my neighbors had his backhoe parked on the pipeline easement for a while and

nobody ever noticed, reported it, or came to check it out. The “smart pig” is not foolproof in finding corrosion damage or leaks. Running electricity through the line won’t reverse existing corrosion. We will only know there is a problem when a community burns down or a water supply is poisoned. Equilon has to do better than that.

I suggest that Equilon either pull new pipe through the old line to ensure against leaks, or that the pipeline be rerouted around communities and away from groundwater supplies. If some alternative can’t be found to guarantee public safety, this project needs to be stopped.

In the 1950’s, this pipeline crossed land inhabited by wildlife and a few head of cattle. In those days, cattle grazed on much of what is now metropolitan Albuquerque. Times change. Land use needs to change too.

44. Jeanne M. Marquart
Sandia Park, NM

Comment Dated February 25, 2002

Dear Mr. Jaramillo:

I am writing in regards to the New Mexico Products Pipeline Environmental impact Statement. My home of over 10 years is within 500 feet of the old pipeline, and let me tell you that it causes me great discomfort to think that a 50 year old aging pipeline within viewing distance of my home may be used to transport highly explosive chemicals. I would hate to see an incident of the caliber of the one in Carlsbad happen in my neighborhood, and my children would be the ones that people would see on the 6 & 10 pm news.

Please review all available information about this before making any decision that could negatively affect your fellow New Mexico citizens. Sincerely, concerned property owner.

45. Ben Albrechtsen

Ogden, UT

No Date – Comment Card

Very good format for meeting. Please send a summary of issues and comment from Moriarty meeting.

46. Jerry Grayson
Placitas, NM

No Date – Comment Card

[My] Comments are safety related issues. The pipeline operator is responsible for safety and must be required to demonstrate through design, analysis, test, personnel qualifications etc. that everything is being done safely. The requirements need to be specified by the government body responsible for pipeline safety. Neither the public nor the government should have to show the system is unsafe. The operator must be responsible for demonstrating safety through their system and also that a system is in place to assure this safety continues into the future. I am not sure that this philosophy is part of the EIS process.

**47. Rebecca Roth
Placitas, NM**

No Date – Comment Card

I would like to see alternative routes away from populated areas. This area is not the same as it was fifty years ago when this route was chosen. I live on Cedar Creek Road where we had a slow leak in December 1999. I am convinced that pipelines cannot be made truly safe.

48. Martin A. Clifton

Placitas, NM

Comment Card

Provided at Jan. 16, 2002 meeting.

49. Will Ovellette

Placitas, NM

No Date – Comment Card

50. Alice Allen

Placitas, NM

No Date – Comment Card

51. Garth and Jean De leon

Placitas, NM

No Date – Comment Card

Need to address concern of aquifer contamination from pipeline leaks.

52. Reid Bandeen

Placitas, NM

No Date – Comment Card

Concerned with potentially lethal explosion hazard.
Concerned with hazard risk to groundwater supply.
Concerned with Equilon's previous failure record.
Concerned with surging effects on weld integrity.
Pipeline is not buried deep enough to protect from explosion hazard.
Insufficient safeguards from excavating/drilling intrusions.

- 53. Carol Parker**
Citizens for Safe Pipelines
Placitas, NM
No Date – Comment Card

[Send] copy of attendance/address list to: Citizens for Safe Pipelines; Carol Parker; Placitas, New Mexico.

- 54. Placitas, NM**

No Date – Comment Card

Will you please mail a copy of the mailing list from Placitas meeting to Citizens for Safe Pipelines.

- 55. Zang Wood**
Flora Vista, NM
No Date

Dear Sirs:

I urge BLM to permit and authorize Equilon's proposed New Mexico products pipeline as rapidly as legally possible. This section of New Mexico (The San Juan Basin) needs other suppliers of fuel products in order to ensure a competitive market as well as enable the population of this area, which will continue to grow, other sources of fuel.

- 56. Margaret Palumbo**
Placitas, NM

No Date – Comment Card

- 57. Peter C. and Alix D. Benjamin**
Placitas, NM
(Comments dated January 24, 2002)

Dear Mr. Jaramillo

Since I am unable to attend the meeting slated for 1/16/02 regarding Equilon Pipeline's proposal to convert from transporting crude oil to refined petroleum products, I wanted to make our stance clear.

If Equilon desires to convert to the transportation of refined products such as gasoline, diesel fuel, or jet fuel, then they absolutely **MUST** replace the pipeline in all high consequences areas including areas of residence, business, riparian areas and most importantly near any schools.

Both of my children are products of the Bernalillo Public School system. The prospect of the possibility of an accidental explosion and fire near our children is the stuff of which nightmares are made. I simply cannot fathom the idea that a

company with the resources of Equilon is unwilling to make an investment that will keep our children safe and (or you) would like a 50-year old pipeline filled with gasoline running through your child's schoolyard.

Thank you for your time and trouble in this matter.

**58. Claire E. Crowley
Placitas, NM**

(Comments dated January 10, 2002)

Dear Mr. Jaramillo:

I am writing in regard to the proposal by Equilon Pipeline Co. to change its pipeline in Placitas to carry gasoline or diesel or jet fuel.

This company has a record of felony violations of Federal pipeline safety laws, incredibly poor safety maintenance and operator training which have already resulted in several deaths!

It is inconceivable that any company with such a horrendous safety record would be given permission to effect such a hazardous change over near any community.

We strongly protest any favorable consideration being given to this dangerous proposal!

**59. Thomas and Kendra Hagan
Placitas, NM**

(Comments dated January 16, 2002)

We are writing to you as a concerned citizens and residents of Placitas, NM. After reviewing limited information regarding the Equilon proposal, my hope is that the BLM will take seriously the safety concerns outlined by various organizations (such as those raised by the Citizens for Safe Pipelines) and conduct a more thorough study of them, regardless of attendance numbers at a meeting. I refer to the meeting being held this evening in Placitas, of which we will not be able to attend due to a previously scheduled obligation.

Of particular concern to us is the casual nature in which these types of proposals seem to come across from interested parties, and are defended with statements that misdirect or provide semi-relevant information. The main concern, in my opinion, is not that they proposes to transport new materials through the pipeline or that they state that the new materials have similar flammability, but it is that safety record of Equilon, the manner in which they have handled past issues, monitoring of the operation and operators, safety records of old pipelines and the current condition of the pipeline in question to support the new use.

I think of [*Waste Installation Pilot Plant*] WIPP shipments that started about two years ago (if my memory is correct) from Los Alamos as an example. We all know that a truck is capable of transporting hazardous materials safely, but that does not mean those in decision making roles did not take the necessary

precautions to study potential impacts and ensure that additional measures are in place to protect the safety and soundness of our communities. In this example, a new highway, special containers, specific routes, monitoring and disaster preparedness were some of the demands that had to be met before the first shipment could occur.

We hope that the BLM will consider all issues before it as they prepare the Environmental Impact Study, regardless of the number of attendees at a meeting of letters received. We may not have all the facts, but we clearly see the need for additional study and attention to this matter before any action on the Equilon proposal occurs.

**60. Kelly D. Williams
Placitas, NM**

(Comments dated January 14, 2002)

Joe Jaramillo,

Dear Sir:

I support Citizens for Safe Pipeline's (CSP) position that Equilon's half-century-old pipeline should be replaced in areas of risk. These areas are near homes, schools, recreation spots and public facilities.

CSP's proposal simply makes common sense considering the recent rash of pipeline failures, Equilon's own questionable safety record, the extreme age of pipeline at issue and the volatility of the product to be conveyed in this pipeline.

I own a home and live in the Sundance Mesa Subdivision in the Placitas area and am very concerned about this proposed conversion. Unfortunately, prior obligations prevent my attendance at the hearing on Wednesday, January 16, 2002. Please note my support for the replacement of the antiquated pipeline with the latest methods and technology. Thank you for your time and consideration.

**61. Roger and Dianne Likewise
Placitas, NM**

Comments dated January 10, 2002

Dear Mr. Jaramillo,

As residents of the Cedar Creek section of Placitas, we have significant concerns about Equilon's proposed use of almost 50 year old pipelines running close to our house and those of our neighbors.

In November, 2001 we attended the open house Equilon sponsored and discussed our concerns with Chuck Moseman, the Equilon project director. He spent considerable time touting the ability of using their "smart pig" to detect any unsafe conditions in the pipeline and reinforcing his supposition the existing steel pipeline "was good as grandfather's shotgun which still worked." These

comments were made by the Equilon project director, in spite of numerous documented “younger” pipeline failures in the past three years.

As we believe you know, the existing pipeline was designed, installed and approved almost 50 years ago to carry crude oil. The type of welding in that pipeline is no longer used because of weld defects with resulting safety concerns. Equilon suggests that the introduction of gasoline and jet fuel as transportable fuels through the old pipeline does not increase the risk to the community. One of us is an ex-Air National Guard refueling officer, in charge of refueling jet aircraft on the flightline, and knows there is considerable difference in the explosive risk of a gasoline leak or spill versus a crude oil leak or spill!

Our position is the pipeline, which runs through Placitas, should be replaced not only in the area of the school and the senior center, but also through the neighborhoods where the children who attend that school, their parents, and senior citizens reside.

We thank you for any efforts you make to ensure the safety of the citizens of Placitas and hope politics and finances do not play a role in the BLM’s final decision.

62. Edward K. Merewether
Placitas, NM

Comments dated January 10, 2002

Dear Mr. Jaramillo,

I want to thank you for presenting the public meeting on the subject of the Equilon Pipeline Proposal. I unfortunately will not be able to attend so my concerns are expressed below.

I am very concerned about the possibility of pumping gasoline through a 45-year-old welded pipe that was designed to transfer crude oil. I believe that the experience with these old pipelines does not justify their use for highly volatile fluids anywhere near homes and schools.

I therefore suggest that the pipeline be replaced with new line whenever it is within ¼ mile of schools, residences, or commercial establishments before authorization is granted for such use.

63. Richard K. Hopkins
Odessa, TX

Comments dated January 2, 2002

Dear Mr. Anderson:

We are in receipt of your letter dated December 3, 2001 advising us of a proposed pipeline installation from Odessa, Texas to Bloomfield, New Mexico. As this proposed installation might affect some of the Texas Department of Transportation Odessa District’s highways and the traveling public, we are

requesting as much information about this proposed project as possible (i.e., location map(s), transcript of the scoping meeting, etc.).

If you have any questions regarding this request or need additional information please call me at (915) 498-4759 or Gary J. Law, P.E., director of Transportation Planning and Development at (915) 498-4712.

**64. Cynthia Brill
Placitas, NM**

Comments dated January 5, 2002

Dear Mr. Jaramillo:

As a Placitas resident, I am opposed to the use of the existing Equilon pipeline for transporting refined fuel products through Placitas.

It is too risky to believe that the operation of controls and testing that is technologically limited in its ability to evaluate old welds can make a pipeline built in 1957 perform on hundred percent operationally for any length of time.

It is a gambling proposition to think that it can given the record of previous failures of these old pipelines. In one large-scale failure in Missouri, a previously hydrostatically tested pipe was found to have split longitudinally 50 feet.

This risk is unacceptable in Placitas where human beings co-exist in close proximity to the pipeline. Now is the time to replace the pipeline in the Placitas area!

**65. Katherine Roxlau
Albuquerque, NM**

Comments dated December 30, 2001

RE: Scoping comments for preparation of an EIS for the Proposed Equilon Pipeline

Dear Mr. Jaramillo:

In response to the Notice of Intent (NOI) published in the Federal Register on December 12, 2001, I am providing comments regarding the preparation of an environmental impact statement (EIS) for the proposed Equilon pipeline. My comments are brief and are enumerated below. I would like to be placed on the mailing list for the EIS, and specifically would like to be notified of the date and location of the public scoping meetings.

- 1) The NIO identifies landowners as BLM, USFS, State of NM, and private. I would assume that the pipeline also crosses Tribal lands. It should be made clear at the scoping meetings and in the EIS exactly what the land ownership status is for the entire length of the proposed pipeline.
- 2) The BLM is the lead agency for the EIS; however, other land-managing and permitting agencies must be involved as cooperating agencies. It should be

- made clear at the scoping meetings and in the EIS exactly which agencies are also involved, what their roles are, and what level of involvement they have in the preparation of the EIS and in the final decision-making.
- 3) Issues that should be analyzed in the EIS should include potential impacts to cultural resources, Native American resources, air quality, noise, both groundwater and surface water, land use, environmental justice, and cumulative impacts. The construction or rehabilitation of a pipeline would have potential impacts to all these resources, whether temporary or permanent.
 - 4) The safety analysis should include both public and worker safety and health. This should encompass occupational safety and health, and potential impacts under normal operations.
 - 5) The EIS should include an in-depth analysis of accidents and subsequent impacts to all of the resource areas. This would include hazardous waste impacts.
 - 6) Impact analysis for all of the resource areas should include the impacts of construction and rehabilitation, along with the impacts of continued operation and accidents.

**66. Bernalillo Board of Education Resolution
Comments received September 24, 2001**

WHEREAS, Equilon owns a 44-year old 406-mile crude oil pipeline that goes between Jal in southeastern New Mexico and Bisti in northwestern New Mexico. Equilon proposes to convert that pipeline to refined products service (gasoline, diesel, and jet fuel) and build two short lengths of new pipeline to connect the existing old pipeline to a refined products pipeline in Odessa, Texas (62 miles of new pipeline) and to an existing terminal in Bloomfield, New Mexico (32 miles of new pipeline), and WHEREAS, Equilon's existing pipeline is made of out-of-date technology subject to unacceptable failures and has not been properly maintained. Equilon's safety record is abysmal. Out of 500 miles of pipeline, only 30 miles would be classified as "high consequence area" under Office of Pipeline Safety's new regulations, according to Equilon. The pipeline is within 200 feet of the property of the Placitas Elementary School and traverses the parking lot of the Placitas Community/Senior Center. Based on a financial analysis, replacement of the pipe this short distance would be easily affordable and should be a stipulation of a permit approving the proposal, and WHEREAS, detailed background reveals the following: Out of Date Technology – The existing pipeline is constructed with a type of weld (low frequency ERW) that is no longer used in new pipelines because of its unacceptable failure rate. Refined products pipelines present special challenges for this type of pipe. Frequent product changes (e.g., gasoline to diesel to jet fuel) necessitate frequent pressure changes that place more stress on the welds than would occur in a single product pipeline such as crude oil. Poorly Maintained – The existing pipeline is exposed in areas of Placitas. The condition of the pipeline does not instill confidence in the past maintenance of the pipeline. Abysmal Safety Record – On May 26, 1999, the state of Washington assessed what was then the largest fine in state history against Equilon for a 1998 explosion at a refinery in which 6

workers were killed. Just 15 days later, in Bellingham Washington, the Olympic Pipeline (managed by Equilon), exploded and killed three young people. 250,000 gallons of gasoline poured through a city park. Proximity to Sensitive Areas – According to Equilon, out of 500 miles, only 30 miles would qualify as “high consequence areas” under federal regulations. That area is primarily from I-40 at Moriarity through the Sandia Mountains, past I-25 to the west side of the Rio Grande. Affordability of Pipe Replacement – Equilon has stated that new pipeline costs \$250,000 per mile, 30 miles would cost 7.5 million dollars in a project whose costs already exceed \$100,000,000. Based on Equilon’s estimate of its pipeline tariff (7.5 cents per gallon) and Equilon’s ratio of operation expenses as a percentage of operating revenues (67%) this would amount to 6 months of net operating revenues on a pipeline that Equilon anticipates using for the next 30 years. Limitations of Inspections to Ascertain Pipeline Integrity – Pipeline companies run instruments called “smart pigs” through pipelines to determine the location of possible weaknesses in the pipeline. The resulting report shows magnetic signals that differ where the metal changes thickness. It is an inexact science at best and the results are open to different interpretations. Requirements of National Environmental Policy Act (NEPA) – NEPA requires that federal agencies evaluate the significance of the environmental impacts of proposed actions. 40 CFR 1508.27 (b) (2) require agencies to evaluate “The degree to which the proposed action affects public health and safety.” BLM has recently signed a Memorandum of Understanding with Equilon that sets forth the issues that Equilon must analyze and present in its Environmental Impact Statement (EIS). Nothing about the condition of the existing pipeline is included. Office of Pipeline Safety is not listed as a cooperating agency even though Citizens for Safe Pipelines and the Farmington BLM office specifically requested its involvement and NEPA specifically encourages the involvement (40 CFR 1501.6) of agencies with jurisdiction by law or special expertise. Office of Pipeline Safety Involvement – OPS has jurisdiction over pipeline safety issues and has special expertise when evaluating the safety of pipelines. However, the General Accounting office has criticized OPS oversight as less than effective. NEPA specifically encourages the involvement of other federal agencies (besides BLM, the lead agency) within the NEPA process as cooperating agencies. By involving OPS within the public scrutiny of the NEPA process, OPS could be held to its task of representing the public in assuring its safety from an old and corroded pipeline. OPS could demonstrate its commitment to its mission by a public review of the Equilon proposed integrity plan. Because of Equilon’s poor safety record, OPS should conduct annual safety audits of Equilon’s operations and training programs and agree to conduct surprise inspections of Equilon’s facilities. THEREFORE, BE IT RESOLVED that because of (1) the outdated technology in the existing pipeline, (2) the poor maintenance of that pipeline, (3) Equilon’s abysmal safety record, (4) the proximity to sensitive areas such as homes, an elementary school and a community/senior center, (5) the affordability of pipe replacement over the short distance that qualified as “high consequence area,” (6) the inexact science of pipeline integrity inspection, and (7) the failure of the BLM to require consideration of the condition of the existing line as part of the public process, Bernalillo Public Schools takes the position that the pipeline should be required to evaluate the condition of the existing pipeline before issuing a Record of Decision for the project, and BE IT FURTHER RESOLVED, that the Office of Pipeline Safety should be a cooperating agency in preparation of the EIS and should review and comment upon the proposed integrity plan

during the appropriate comment period, and BE IT FURTHER RESOLVED, that the Office of Pipeline Safety should agree to conduct annual audits including surprise inspections of Equilon's facilities as part of the permit stipulations. DONE this 15th day of August, 2001. Lorenzo Tafoya, President; Jack Torres, Vice President; Errol Chavez, Secretary; Ed Cooka, Member; Nancy Walker, Member.

**67. Edgewood Soil and Water Conservation District Position Paper –
January 3, 2002
Equilon Pipeline Project
Moriarty, NM
Comment dated January 3, 2002**

The Edgewood Soil and Water Conservation District (ESWCD) as provided through the "New Mexico Soil and Water Conservation District Act (SWCDA) (as amended 1997) is authorized to protect and promote the health and general welfare of the people of the state of New Mexico. The ESWCD is further authorized to conduct research activities, provide technical assistance, and cooperate with other state and federal agencies to promote conservation practices and implement restoration projects. To this end, ESWCD has prepared this position paper regarding the Equilon pipeline retrofit project.

ESWCD has received notice that the BLM will be the lead federal agency for the Environmental Impact Statement (EIS) conducted on the Equilon pipeline retrofit project. The pipeline, once used to transport crude oil, will be used to transport petroleum products (gasoline, diesel and jet fuel) from Texas to northwestern New Mexico. ESWCD also understands that the existing pipeline is approximately 40 years old. According to Equilon, the existing pipeline has been inspected using current standards for pipeline safety. Equilon has replaced a few segments of the old pipeline, however Equilon's intention is to utilize the existing pipeline as much as possible. The ESWCD is concerned for any portions of the pipeline that may traverse district property or private lands within the district.

Based upon currently available information, the ESWCD is not assured that the remaining older portions of the pipeline are of sufficient integrity to (a) withstand any mechanical failure, and (b) contain potential/probable leaks that may harm the environment, natural resources or otherwise devalue ecologically or monetarily private or district property through contamination.

In line with the responsibilities of the ESWCD through the SWCDA, the ESWCD is committed to a) protecting the natural resources of the district; b) assisting private land owners with probable or potential impacts from pipeline activities; and, c) assisting the BLM with review of any natural resource evaluations and information as the data pertains to the ESWCD.

The ESWCD is therefore resolved to conduct activities and provide recommendations to ensure the Equilon proposed pipeline actions are in line with district responsibilities. These activities will include but not be limited to:

- 1) complete review of all pipeline layout schematics to identify any portions of the pipeline that traverse or abut district property.

- 2) complete review of landowner lists compiled by Equilon to identify ESWCD residents.
- 3) complete review of natural resource documentation as it pertains to district boundaries.
- 4) provide recommendations that will protect natural resources on district and private land impacted by the pipeline.
- 5) Evaluate BLM findings and provide comments during the appropriate comments periods.

The ESWCD requests that the BLM include the district in its mailing and notifications as a cooperating state agency. A letter has been submitted to the BLM making this request. In this manner the ESWCD would facilitate the fulfillment of district responsibilities and contribute on the manner intended by the NEPA EIS process.

68. Sandoval County Board of Commissioners Regular Meeting. Commission chambers, November 1, 2001–6 p.m.

Agenda item #7 - EQUILON PIPELINE

- A. Status Report
(Chuck Moseman, Project Director, New Mexico Products Pipeline)
- B. Request for Approval of Resolution No. 11-1-01.7B, Requiring a Full Disclosure of the Equilon Pipeline and Requiring that the Pipeline be Replaced in High consequence Areas
(Carol Parker, Placitas)

[The rest of the meeting agenda also was included.]

**69. Jean Eichberger
Placitas, NM**

Comment dated January 22, 2002

RE: Comments to move pipeline north: Definitely not! North of Placitas is a pristine area in which many artifacts and threatened plants and animals are located. Do not move a hazard into someone else's backyard.

- Pipeline hazards are greatly increased with the natural gas lines running over them.
- There are only 2 or 3 sources of water supplying Placitas. We cannot afford the slightest risk to these sources.
- Any contamination or damage to the Placitas water supply will negatively affect Rio Grande and the Albuquerque Aquifer.
- Please, just tell them NO! There is no reason for a pipeline of this nature to run thru such a mountainous and vulnerable area. There is just not enough money to replace life!

Thank you for taking our comments. I only hope it is for more than procedure.

70. Nora Caldwell

Comments dated January 18, 2002

To whom it may concern:

I am a Placitas resident who is extremely concerned about the proposed Equilon pipeline. When the existing pipeline was put in over 40 years ago, this area was basically underdeveloped. Now there is a school, a community center, and numerous residential developments in close proximity to the pipeline.

I have two young children about to attend the Placitas Elementary school, but I am having second thoughts unless one of two outcomes occur . . . “no action” or a new pipeline AROUND Placitas. Based on Equilon’s safety record, any testing they do to the old pipe is completely meaningless and should not be considered an option. Thank you for your time and consideration.

**71. Robert M. Wessely, Vice President
Friends of Placitas
Placitas, NM**

Comments dated January 16, 2002

Re: Equilon Pipeline Project in Placitas

Dear Mr. Jaramillo:

Remembering Bellingham and Carlsbad, we ask you not to treat pipeline safety lightly. The pipeline that Equilon is proposing to resurrect is 44 years old and runs right through our community, quite close to the elementary school, under the senior center, and near numerous homes.

We are amazed and disturbed that the Bureau of Land Management (BLM) is even considering the re-opening of this relic of the past. Our concern is intensified when we consider that the pipeline is proposed to carry more hazardous materials than it carried before it was shut down and left to deteriorate.

I am sure you have been informed on the litany of flaws in this project as proposed. These include the old technology welds (pre 1970 low frequency resistance welds) further deteriorated with age, inadequacy of pipe testing technology to detect hazards, increased consequences of accident with the new fuels, and the less than exemplary reputation of the owner.

As I’m sure you know, the outward force on these pipes is proposed to be well over 100 tons per linear foot of pipe, and with regular pressure fluctuations. At those kinds of stresses, there is absolutely no excuse for using anything by the highest quality pipe anywhere. And there is less than no excuse for it in areas where there is close population, a senior center, and an elementary school.

In working the EIS, we ask you to reject any solution that does not include total replacement of the pipe as it runs through Placitas.

**72. Janice Dunsirn
Placitas, NM**

Comments dated January 10, 2002

Subject: Proposed Equilon Pipeline impact study – Placitas, NM

Dear Mr. Jaramillo:

I am a resident of the Placitas area. Unlike many people that will attend the January 16th meeting, the proposed pipeline conversion will more than likely not directly impact my life. It runs about ¼ to ½ mile away from our house. Only an explosion of the closest point would cause catastrophic damage to our property. Never the less the overall project and all its ramifications is troubling.

I have noticed that three homes in our subdivision are located almost directly over the line and there may be more that are equally exposed to a catastrophic event.

Many things have happened in this area in the last 44 years since the pipeline was first built. A significant amount of construction exists where wide-open spaces were the norm in the mid 1950's. What is more, most of the construction has been residential.

The other concern, surely, to the BLM and Equilon Pipeline Company is the elementary school and civic center that has since been built in very close proximity to the pipeline. The formula for disaster is growing.

I will not belabor the facts of pipeline construction and updated techniques for insuring safety to a pipeline carrying the types of fuel that Equilon will be feeding through our area. I am sure you have reams of white paper on all the statistics and studies. I do know that if this pipeline is allowed to go through as proposed it will be difficult for people to sleep easy knowing that thousands of gallons of jet fuel and gasoline are flowing outside the bedroom and classroom windows of their neighbors in a pipeline never designed or expected to carry such liquids.

This nation needs its fuel. I come from an area steeped in Oil and Gas Industry history, Midland, Texas, and know what is being asked when I say Equilon Pipeline needs to replace the lines through this area.

We need the assurance other areas are being given on the subject. An updated pipeline needs to replace our existing line, alleviate the anxiety of the population of Placitas, not only in the Village but all the way through the residential areas and giving wide berth to the population.

We can not rely on averages and statistical probabilities where so many human lives could be effected. I am urging you, as the project manager, to look at the alternatives to just turning on the faucet and letting the fuel flow into our lives. Safety and safe guards need to be paramount in this situation and I urge you to consider this letter when making your decision.

Good luck at the meeting on January 16th. I am sure many of the things I have written here and many more items I have not related will be discussed that night by more knowledgeable sources but as a resident in the line of impact of the decisions I felt that I should let you know how I felt and why.

Thank you for taking the time to read this letter and I know you will be wise in your decision.

- 73. Joyce M. Price**
Placitas, NM
Comments dated January 18, 2002

My basic concern is the apparent lack of integrity within the fossil fuel industry. Huge profits seem to be their goal at any cost. It is perfectly clear that any interest in safety would guide them to replace their 1957 pipeline if not entirely, at least when it comes close to schools, community centers, and existing homes. Is it not true that Equilon has been indicted for felony violations of the federal pipeline safety laws? Has it not ignored problems known to exist just because of difficulty to access? When confronted has not Equilon used excuses such as a pipeline shared with other companies? When a company's past record includes such behavior, one's trust is gone. All plans and promises are suspect.

- 74. John and Linda Bullock**
Placitas, NM
Comments dated January 23, 2002

We believe that since the pipeline was designed for crude oil and has been known to have defects, it should be replaced or reinforced in any residential areas, especially Placitas.

- 75. Barbara Bass**
Moriarty, NM
Comments received January 23, 2002

Noise and order from the terminal at Highway 41 Walker in Moriarity. Highway 41 access – Walker access – truck traffic/noise/pollution. Light pollution for the terminal? Hours of operation for the terminal? No 24/7 [*operation is*] acceptable. Traffic on Highway 41 is already heavy during early morning & then in the evening lots of people commute to Albuquerque. Getting out to go north on Highway 41 from Walker takes 2 to 3 minutes. The police and sheriffs don't/can't control the speed of traffic on Walker – gets worse with 80 (minimum) trucks a day in and out of the terminal. School buses trying to get in and out of the terminal trying to get out of Walker will be worse with all the big rigs. More D.O.T. inspections of the trucks. My biggest concern is the Terminal to be placed at Highway 41 and County Road A095 (aka Walker Rd).

Would you want this terminal in your backyard?

Isn't there a less populated location for the terminal? That would have less of an impact on the already congested Highway 41 and access to I-40 in Moriarity? And less impact on the residents?

Traffic increase on Highway 41 would be overwhelming to the city of Moriarity and to the residents who access Highway 41 from Walker Rd. This area is out of the city limits and under the jurisdiction of the County. County police officers are already stretched so thin that highway patrol of this area is practically non-existent. They already have stated that they have no way to control the speed of traffic on Walker, which is posted 35 mph. I live on Walker and daily watch people fly down the wash-board dirt road at speeds in excess of 60 mph not even slowing down for the stop sign which we petitioned to be put in place to try and slow traffic down.

Getting out onto Highway 41 from Walker can already be a problem at times. I had to wait for up to 3 minutes to get out onto Hwy 41. Not only the amount of traffic, but the fact that some don't think 55 is fast enough so they pass (sometimes more than one car at a time). I've almost been hit head-on several times by south bound drivers passing coming up the hill past the school bus yard (Plant Services). To no avail will they re-strip the road with double yellow lines. Of course people fly past you on the double yellow too. Slow tankers would definitely be a nuisance. Of course those tanker drivers that think they rule the road are a problem also. I drive 100 miles a day mostly interstate so I know about New Mexico drivers. Winter time and icy roads are whole other issue as to regards to safety on the roads.

There is also a lot of Rodeo traffic on Highway 41. People hauling horse trailers. This is beef country so there are a lot of stock trailers also. During the summer months there is a steady stream of hay haulers too.

A light at the terminal entrance does the residents of Walker no good. Walker Rd is used on school days by no less than 10 buses, of those at least half make 4 passes in and out of Walker Rd down to the Moriarity schools. (Which are located not 1 mile from the proposed location of the terminal). On two of those passes the buses are filled with children. Most of the high school students drive themselves to and from school. You also have those parents or grandparents that choose to drive the kids to school themselves.

Who pays to maintain the road? Who pays for the increase in traffic control by the sheriff's office? What about upgrades due to the terminal and all that truck traffic. You'd have to do traffic impact study on Highway 41 and the access routes to I-40. Accidents on this stretch of road could be disastrous. Explosions, spills, etc.

What about the huge water well under the property? That water table is our lifeline. What guarantees do we have that the tanks won't leak into our wells? Accidents happen, it's a fact of life. We can't afford one with the water.

I heard someone say they were hoping for a MINIMUM of 80 trucks a day to pass through the terminal. That's a lot of trucks. Too many trucks in my opinion.

Then there's the question of the Noise, Odor and Light pollution from the daily operation of the terminal itself. You can't tell me it won't smell. You can smell the Navajo terminal a mile away. (This is located just south of Lisa's truck stop on the east end of Moriarity.) The wind is always blowing in Moriarity from one direction

or another. There has to be some odor leakage, what about when they're filling the trucks?

What hours would they operate? Would they work around the bus schedule during the school year? A 24/7 operation is totally unacceptable.

The peace and quite of country life is sacred. Sound carries great distances out in these open plains. Leaving the windows open for the clean fresh air is one of the biggest joys of living in the country. I live 1½ miles west of the proposed location, I can hear the generators running in the early morning hours when they water the corn fields that currently fill the proposed location. I would not like to be awoken every morning to the sounds of trucks and pumps. The pollution from the trucks alone would be another issue. Ever pass Rip Griffins's in the early morning hours? Looks like a bon-fire. Sounds and smells worse than that. This is especially an issue in the cold winter months. For those of us with asthma, this is a real issue. That's why I choose to live outside the city limits.

Lightning is another issue. We cherish the dark night skies; it would be a disgrace to have another glow from obnoxious bright white lights.

We moved to the country to get away from the sounds and sites of the city.

76. Paul Ingles
Placitas, NM

Comments dated January 22, 2002

My feeling is that pipeline companies would rather pay out on wrongful death lawsuits than spend the money to prevent a tragedy. They should be willing to cut corporate profits and then, if the result is still higher gas prices, we should all be willing to share the cost for the safest possible transport of volatile fuels.

77. Leonard Stephens
Placitas, NM

Comments dated January 23, 2002

Very good meeting. Let's hope it accomplishes something good. Would prefer Equilon chose one of the alternatives, i.e., 1) replace entire line, 2) replace lines in high-density areas, 3) use a line at Moriarty and bypass Placitas, and 4) but do something.

78. Laura Robbins
Placitas, NM

Comments dated January 23, 2002

I agree that the pipeline must be replaced in residential and high use areas, such as in proximity to the community center and elementary school. The risk of fire is very high during the frequent times of drought and the potential for disaster (were the pipeline to break) is serious. It makes much more sense to create a pipeline through an area other than Placitas and other rural areas. Go Around! Let Equilon spend a bit more money to avoid water contamination and danger to

citizens and fragile animal and plant life. * I mostly support the “no build option” where no fuel would pass through the pipelines.

79. Peter Callen
Placitas, NM

Comments dated January 23, 2002

Why are we having a wealthy oil company (Shell) put all of our children, our water supply, and a large part of our Placitas community at risk from a 40-year-old pipeline? As the crude oil pipeline sits now, it is empty and benign. But fill it with pressurized gasoline, jet A or diesel fuel, and the old pipeline – with its pre-1970s welds, above ground exposure, location along our only surface stream (Las Huertas Creek) and major aquifer recharge zone, and its proximity to the elementary school, senior center, and many residential areas – in this situation the old pipeline becomes a bomb that no one here wants at all. If this project proves to be legal (at the time it is in litigation in Utah), and jet fuel is put through this line, will we have a new pipeline and check valves installed throughout our community? Can Shell oil afford to protect its customers?

80. Adelbert Miller
Placitas, NM

Comments dated January 22, 2002

After listening to the public meeting in Placitas, I feel there are 3 major points summarizing all the concerns and issues reported on. (1) Trust in Equilon – After all they are named in felony indictments by a federal grand jury. (2) Re-routing* around the mess that is the Placitas right-of-way makes sense. (3) Our community seems uniformly against the proposal.

* or terminals in Moriarty

81. Joan Lawler
Placitas, NM

Comments dated January 22, 2002

1. Reroute pipelines to BLM away from population
2. Replace all pipe near residential areas.
3. 40+ year old pipe is too old.
4. New technology is available for metals and welds.
5. Emergence response personnel NOT AVAILABLE in Placitas to manage accident/spill.
6. Existing safety controls are inadequate and only address actions to be taken after accident.
7. Federal Office of Pipeline Safety is a joke.
8. Accident spill would have negative impact on ground water in Placitas.
9. This pipeline is unnecessary.

- 82. Karl R. Wiese**
Bernalillo, NM
Comments dated January 23, 2002

Residents of Placitas are very concerned about the prospect of gasoline or jet fuel being pumped through a 43-year old pipe in the middle of their community. They are also concerned, considering a worse case scenario, of the inability of public safety responders to adequately handle the situation. Limited resources, equipment and manpower would prohibit the fire department and sheriff's from providing proper response. A worst case scenario of a major breach of the pipe resulting in thousands of gallons of ignited fuel flowing into a nearby community center and school is a scary possibility. Their concern is understandable.

- 83. Donna and Leonard Loeb**
Placitas, NM
Comments dated January 29, 2002

The pipeline runs through our property. As resident of Placitas, we do not want the pipeline running through our backyard. We are totally opposed to the pipeline. It could destroy our quality of life here. As we have researched there are far too many accidents that occur with pipelines. Placitas is a far too special place to take this risk. We intend to fight this to the end.

- 84. Mike Bertin**
Sandia Park, NM
Comments dated January 24, 2002

- 1) The pipeline is only 14-16" deep in places on my property. I would like the pipe to be dug up, replaced with new pipe and reburied at of below the proper depth.
- 2) I would like to know the cause of the large crater straddling the pipe about ½ mile north of my property. Cause, date, repairs, etc.
- 3) I would like to know the results of all tests performed in the pipe within 1 mile of my property (wall thickness, corrosion, depth, measurement tools used, etc.) and the corrective action taken.

Thanks for paying for the gates where my pasture fences cross your pipeline.

- 85. Robert and Joy Gajkowski**
Placitas, NM
Comments dated January 25, 2002

My wife and I attended the meeting in Placitas on 1/16/02. First, I would like to apologize for the rude behavior of some of my neighbors. As you can see, the pipeline thru our community is a very serious matter. As a resident—and, too, as a board member of a cooperative water system in Cedar Creek—I and my wife are very concerned for the community's physical safety as well as for the safety of our water supply. As you might know, a year or so ago, a pipeline running along Las Huertas Creek in Cedar Creek leaked several hundreds of gallons of pipeline content into the creek bed. While there seem to be no noticeable consequences of that leak thus far, we continue to hold our breath. The leak was only several hundred feet downstream from the water cooperative well site that serves 37

residences in our subdivision. If a neighbor had not been walking along the creek bed and had not noticed the signs of a leak, considerable damage to the creek, the aquifer—and the cooperative’s water supply might have occurred. It does not seem unreasonable for the Placitas community to ask that every precaution be taken to insure a safe pipeline. We do not think that the greater majority of Placitans object to the pipeline being used through our area. We do think, however, that it is only prudent that a 50-year-old pipeline’s be replaced—not rehabilitated! Certainly, both the pipeline’s owner would be in a far more desirable position of they were utilizing the most up-to-date materials and not angering the community with which they were dealing. Forty years is a long time—for humans and pipelines—and both should be treated with the respect each deserves. Both “slow down” with years; each encounters weaknesses of the body. While neither necessarily is going “to fail,” the possibility sure does increase with age. Why take a chance with a pipeline that could prevent one of many from reaching their fifties?

86. Mark A. Plake
Artesia, NM

Comments dated January 25, 2002

In the literature that has been made available, there is nothing that reflects the changes (increases) in products that are available on the Albuquerque/Santa Fe and Bloomfield/Farmington Markets in 2002 versus 1998/1999, when the original studies were prepared. It is important that this information be made available to the public and considered by the BLM before a decision is made regarding the need for this pipeline.

87. Robert Stannard
Farmington, NM

Comments dated January 25, 2002

I generally favor the project.

88. Bob McKinney
Lone Star Transportation
Odessa, TX

No Date

I think this is a great project. Great for Texas and New Mexico economy. I think there will be minimal environmental impact.

89. Phil Mercurio
Placitas, NM

Comments dated January 24, 2002

I live across the street from a pipeline on Hohokam road in Cedar Creek, Placitas. I believe putting this very old pipeline on service presents a unique and unknown risk. Please thoroughly evaluate this risk before proceeding. The pipeline is over 40 years old. The cost of replacing this old pipeline would be dwarfed by the costs associated with explosions (including death to humans living by the pipeline). I

have no problem with dust or inconvenience associated with replacing the pipeline. I will be contacting my legislators to this effect as well. Thank you.

**90. Sydna A. Allen
Placitas, NM**

Comment dated February 1, 2002

I am interested in all the issues you listed in your newsletter but primarily the safety issue. I attended the Placitas meeting and when knowledgeable people voiced their concerns over the old [illegible], I felt this was the primary issues. Much more research is needed and, proof of safety before I would agree with Equilon.

**91. Sydney Kennedy
Jal Economic Development
Jal, NM**

Comment Dated January 31, 2002

Dear Mr. Jaramillo:

Thank you for coming to Jal NM on January 22 regarding the proposed Equilon project. We are hoping this will be a success for all concerned parties. We look forward to future visits with you.

I contacted Mr. and Mrs. Jimmy (Becky) Doom as per your request.

In our community we have a "community breakfast" at 7:00am in the Woolworth Library the last Friday of each month. If you are in the area, I would encourage you to attend. It is a good tool for meeting people in our community as well as enjoying a delicious free breakfast.

Again, thanks for your support.

**92. Gregory S. Taylor
Sandia Park, NM**

Comment dates February 26, 2002

Re: New Mexico Products Pipeline Environmental Impact Statement

Dear Mr. Jaramillo:

I appreciate this opportunity to raise grave concerns regarding Equilon Pipeline Company's proposed new service of a 50-year-old crude oil pipeline to transport refined petroleum products. I live in the Fox Hills neighborhood of Sandia Park, NM.

This pipeline project poses serious threats to water, environmental, visual, socioeconomic, and transportation resources, and risks to human health and safety. Therefore, I consider the project to be dangerous and unworkable unless

these risk factors can be alleviated to the satisfaction of all impacted communities.

Water resources: The pipeline crosses my community's aquifer within 100 feet of our well. Equilon representatives state that their only detection method for "small leaks" (e.g., 50–60 gallons per hour) is to test our well water periodically for contamination. This is unacceptable; by then the damage is done. Water is far too precious in the West. My community cannot tolerate any increased risk to our supply.

Environmental resources: This is a proposal to pump large volumes of highly volatile flammable chemicals from sea level to 7000 feet at pressures up to 600 psi through an aging pipeline, passing through western forests and populated areas. Pollution and catastrophic fire are very real dangers.

Visual resources: Equilon could eliminate dangers posed by the old pipeline by removing and replacing it, or installing new pipeline along the route. This is an unattractive alternative for them due to cost; it's unthinkable for us because of the long-term damage that would result. The original pipeline project made a scar 30 feet wide through our piñon-juniper woodland; a space now punctuated by occasional trees up to 8 feet tall that have grown back in the last 50 years. New excavation would destroy the slow revegetation process.

Socioeconomic resources: My lot is located along and downhill from the pipeline easement. Our road system crosses it several times. Our community well is adjacent to it. Therefore all of the risks and issues associated with the Equilon project pose a threat to property values in Fox Hills.

Transportation resources: Equilon's project manager maintains that pipelines are the safest way to transport petroleum products. "You don't want to move the fuel in trucks," he said at the January 15 scoping meeting in Moriarty, NM. Yet, by his own estimates the proposed Moriarty transfer station will cause an additional 50 to 100 tankers a day to be driving Interstate 40 east of Albuquerque. This stretch of interstate highway is already clogged with large trucks and commuter traffic, and winter weather causes such hazardous driving conditions in this area that the state police often close the road during storms. All local commuters using this route should be very concerned about this daily upsurge in truck traffic.

Human health and safety: The pipeline originally passed through sparsely populated or uninhabited land. Now, there are many communities, houses, and schools along its route. This project raises significant human health and safety risks without adequately addressing them. Equilon's safety measures are simply not good enough. They propose they propose to use "smart pig" technology to detect flaws in the 400 miles of old pipe, but even if this method were 99% accurate (which it is not), then the pig would be wrong about conditions in 4 miles of pipe! Equilon employs small aircraft to fly the pipeline weekly to visually detect leaks and signs of construction or excavation in the easement. With a crude oil pipeline this might work, but it is difficult to see a gasoline leak from the air—fuels can volatilize without leaving visible signs. As for signs of construction, Equilon representatives in Moriarty were unhappy to hear that one of our residents had parked his backhoe in the pipeline easement for an extended period and aerial surveillance pilots did not report it. The Equilon engineers asked him to call and report this himself the next time it occurred. They told him they sometimes park construction equipment on the pipeline themselves to test the pilots. In other words, Equilon asks us to trust the aerial monitoring, but they themselves do not. The implications are sobering. Many construction projects have occurred along

the pipeline easement in the past 50 years. Equilon tells us that corrosion from construction damage is the primary cause of small leaks, aerial surveillance doesn't find all the construction, the "smart pig" can't detect all the damage, and Equilon has no early detection method for small leaks. In summary, I strongly believe that the risks posed by the New Mexico Products Pipeline project far outweigh its potential rewards. In the current circumstances, I urge the BLM to recommend "No Action," and stop this project.

94. Jennifer Delany
Citizens for Safe Pipelines
Comment Dated February 23, 2002

Attn: Joe Jaramillo

Please let it be known that I am concerned about the pipeline in Placitas. I worry about many things such as an explosion near the Community center and the school. Here is a list of other concerns:
Will Equilon honestly and faithfully monitor and inspect the pipeline for a lifetime?
Who will make sure they do?
Is it true that Equilon's safety record is not as good as they make it sound?
Can a crude oil pipeline handle transporting gasoline, diesel, and jet fuel?
Can our pipeline handle transporting gasoline, diesel, and jet fuel?
Can our pipeline handle the stress of fluctuating pressures?
Is it true that gasoline is more likely to ignite than crude oil?
How will this effect our future water supply and the environment of Placitas?
Can the Placitas Fire Department handle this type of emergency if anything should go wrong?

What has changed in safety of pipelines since the Carlsbad explosion?
Should the pipeline be rerouted out of Placitas to a safer, unpopulated area?
Can the pipeline be rerouted to a safer area?
Would it be to Equilon's benefit to reroute the pipeline out of Placitas?
This is only a small list of my concerns. Every day there are more questions about the safety and integrity of this pipeline and Equilon's intentions.
P.S. Enclosed are (2) two notes of concern from other citizens in Placitas.

January 6, 2002

Jennifer,

I won't be able to attend the meeting this week in regards to the pipeline in Placitas. I did want to let you know that I don't approve of it so that you could perhaps pass that information along for me. If there is anything I can do in the future to further that cause please let me know. Thanks for passing this information along, and please let me know about anything else that may arise in regards to this issue.

Sincerely, Paulette Penner

January 6, 2002

Jennifer, Thanks for the information on the pipeline in Placitas. I will be unable to attend the meeting this week, however, I wanted to express my concerns about the safety of it being in our backyard, With the information I have read I do not feel it would be safe and, therefore, do not want the pipeline there. I feel it should be relocated somewhere else. If you need me to sign a petition and/or anything

else to make this possible please let me know. Please keep me informed of any further updates on the situation. Regards, Kathy Benet.

96. Gary Tipton

Albuquerque, NM

February 28, 2002—Comments Dated

Dear Ms. Burns,

My concern on the reopening of the pipeline is to insure adequate inspection of the pipeline before and during the operation of the pipeline. Where the pipeline runs through residential neighborhoods, more stringent and more often inspection requirements should be imposed to further insure maximum protection of the residents living adjacent to the pipeline.

Even Equilon has acknowledged the possible dangers present upon operation of the pipeline. This was evidenced by a representative of Equilon speaking against my proposed subdivision in Torrance County in 1996. The neighbors who opposed my subdivision request, recruited a representative of Equilon to speak on the dangers of the pipeline at a Torrance County Commission meeting. The Environmental Impact Statement requirements should be as thorough as possible, and have exceptionally stringent inspection and operation requirements favoring residents who live adjacent to the pipeline.

Should you have any questions or require additional information, please feel free to contact me.

162. Snow Moore Watson

Placitas, NM

Postmarked March 7, 2002

I am aware this is postmarked late, however I strongly believe that you must know about a state licensed, home daycare at 51 Camino de las Huertas.

Mrs. Georgia Trujillo is licensed for 12 children. She has 4 children of hers living with her. Her oldest daughter, Demitria, lives on their property (closer to the pipeline). She has two children and is pregnant now. The pipeline is at their property (next door to the community center).

My children have, and will continue to go, to Mrs. Trujillo's MWF during the day. I believe the change from unrefined fuel to jet fuel represents an explosive hazard potential 100 fold. Who will raise their hand and proudly proclaim they have killed these children!

204. Will Parker

Placitas, NM

Postmarked February 8, 2002

In my opinion, this project has been improperly segmented in violation of NEPA. Why did Equilon and Williams break up the Aspen project? Why did BLM reverse its own position on this – earlier you said yourselves that it needed to be done as one EIS. It makes no sense for Williams to say there is all kinds of supply in Bloomfield at the same time Equilon says there's a shortage. It appears Equilon is segmenting the project to avoid a higher level of environmental review. This does not speak well of their commitment to safety. New pipe in the high consequence Moriarty-Bernalillo section is an absolute must.

Comment Letter From
Carol Parker,
Citizens for Safe Pipelines