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WWALS is an IRS 501(c)(3) nonprofit charity est. June 2012

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.











To: Nathaniel J. Davis, Sr., Deputy Secretary. Federal Energy Regulatory Commission (FERC) Via e-filing

Re: Motion to Intervene by WWALS Watershed Coalition, Inc., in proceeding on Request for Extension by Sabal Trail Transmission, LLC, Docket No. CP15-17

Dear Secretary Davis and FERC Commissioners,

Pursuant to the Commission's Rules of Practice and Procedure (18 CFR §385.214 and 18 CFR §157.10) and the Regulations under the Natural Gas Act (18 CFR 157.10), WWALS Watershed Coalition, Inc. (WWALS) as Intervenor hereby moves to intervene as a party to this proceeding, namely the intervention and comment period (see FERC Accession Number 20200327-3095) on the March 26, 2020, request by Sabal Trail Transmission, LLC (Sabal Trail) for an extension of time to construct and place into service its Phase II project facilities for its Sabal Trail Project authorized on February 2, 2016. In support hereof, Intervenor shows as follows:

1. Contact Information and Service of Filings

Intervenor requests that the Commission include the following representatives on the official service list to receive service of all filings and communications made in this proceeding:

John S. Quarterman, Suwannee Riverkeeper, WWALS Watershed Coalition, Inc., wwalswatershed@gmail.com

2. WWALS is an intervenor party to the underlying proceeding

in Docket No. CP15-17 (see FERC <u>Accession Number 20141222-5054</u>), as required in FERC's March 27, 2020, "Notice of Extension of Time Request re Sabal Trail Transmission, LLC under CP15-17" (see FERC Accession Number 20200327-3095).

3. Basis for Intervening:

- a. WWALS Watershed Coalition, Inc. (WWALS), established 2012, is a nonprofit environmental advocacy organization, with active members and supporters in Georgia and Florida. WWALS remains deeply concerned about the destructive activities of Sabal Trail as they affect rivers and the Floridan Aquifer in south Georgia and north Florida, consonant with the WWALS Mission, which is that WWALS advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.
- b. All the gas delivered by Sabal Trail to its Dunnellon Compressor Station site passes under the Withlacoochee, Suwannee, and Santa Fe Rivers in the Suwannee River Basin. Years ago WWALS discovered drilling fluid leaking up from Sabal Trail's pilot hole below the Withlacoochee River in Georgia (see Accession Numbers 20161024-5049, 20161109-5153, and 20161128-5230), despite the assurances of Sabal Trail that that would never happen in the similar geography of the Suwannee River. Such leaks