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To the members of the Ohio Power Siting Board:

Please deny Duke Energy's request to route a 30" diameter natural gas pipeline rated for a maximum pressure of 720 pounds per square inch through densely populated areas of southwestern Ohio, and to ask Duke to re-route it. It is unsafe, putting at risk thousands of Ohio lives.

Why is this unsafe? First, the pressure rating on the line is far higher than generally accepted standards for pipelines in densely populated areas. The American Petroleum Institute, API, is the trade group which produces these standards. API advocates for its members as well as sets and maintains codes that are widely used as standards for design, construction, and maintenance of equipment for extraction, processing, transporting, and storing oil, gas, and chemicals. The API codes refer to pipelines between 500 psi and 1500 psi as transmission pipelines, and discuss how to safely connect them to pressure-reducing equipment and then into lower-pressure piping networks before entering cities or towns.

Second, Duke Energy has not demonstrated that it has any experience building or maintaining a natural gas pipeline at this pressure rating or even close to this pressure rating. When asked, Duke's representatives point to Duke pipelines rated for "greater than 60 psi." 60 psi is less than 10% of 720 psi. That makes this proposal an extremely dangerous experiment.

Third, accidents happen. Even when all the proper risk-reducing measures are taken in construction and maintenance, leaks cannot be 100% prevented. Risk management software used by our local municipalities predicts that a leak in this pipeline will burn totally everything in a half-mile radius, and do serious damage within a mile radius. In Hamilton County, regardless of the exact route chosen, the loss of life and property would be comparable to that caused by war.

Because the amount of natural gas this proposed pipeline could carry is many times the total amount used by all business and retail consumers in Ohio, and because it appears that the pipeline will eventually be connected to port cities on the Gulf of Mexico, it is reasonable to assume that Duke Energy believes the international market for natural gas will be strong. That would mean jobs for Ohioans, money to build and/or upgrade hydraulic fracturing operations to modern safety and environmental standards, and profits for Duke Energy shareholders. Those are all good things. This pipeline must be rerouted through unpopulated areas, and Duke Energy must demonstrate it has the ability to build and maintain it safely, to make those things happen.

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