



FEDERAL ENERGY REGULATORY COMMISSION

Office of Energy Projects

Guidance for Horizontal Directional Drill Monitoring, Inadvertent Return Response, and Contingency Plans

October 2019

TABLE OF CONTENTS

| | | |
|------------|---|-----------|
| 1.0 | INTRODUCTION..... | 1 |
| 1.1 | Overview..... | 2 |
| 2.0 | PREPARING HDD PLANS FOR NATURAL GAS ACT APPLICATIONS..... | 2 |
| 3.0 | HDD PLAN CONTENTS..... | 3 |
| 3.1 | Introduction..... | 4 |
| 3.2 | Personnel and Responsibilities | 5 |
| 3.3 | Pre-Construction Activities..... | 6 |
| 3.3.1 | Training..... | 6 |
| 3.3.2 | Site Inspection..... | 6 |
| 3.3.3 | Landowner Notification Procedures | 7 |
| 3.3.4 | Agency Notification Procedures | 7 |
| 3.4 | Documentation..... | 7 |
| 3.5 | Drilling Fluid Management..... | 8 |
| 3.5.1 | Drilling Fluid Additives..... | 8 |
| 3.5.2 | Drilling Fluid Physical Properties..... | 9 |
| 3.5.3 | Drilling Fluid Disposal | 9 |
| 3.6 | HDD Operational Conditions and Response Actions..... | 9 |
| 3.6.1 | Drilling Procedures | 9 |
| 3.6.2 | Monitoring and Pedestrian Surveys..... | 10 |
| 3.7 | Responding to IRs..... | 10 |
| 3.7.1 | IR Response Materials and Equipment..... | 11 |
| 3.7.2 | Accessing Releases off Right-Of-Way and in Inaccessible Areas | 11 |
| 3.7.3 | Releases within other Sensitive Resource Areas | 12 |
| 3.8 | Restoration | 13 |
| 3.9 | Contingency Planning..... | 13 |
| 3.9.1 | Alternate Crossing Measures | 13 |
| 3.9.2 | Abandonment..... | 13 |
| 4.0 | HDD PLAN ATTACHMENTS..... | 14 |
| 4.1 | Site-Specific Crossing Plans | 14 |
| 4.2 | Safety Data Sheets | 15 |

LIST OF ACRONYMS AND ABBREVIATIONS

| | |
|------------|---|
| Commission | Federal Energy Regulatory Commission |
| EI | Environmental Inspector |
| FERC | Federal Energy Regulatory Commission |
| HDD | Horizontal Directional Drill |
| HDD Plan | <i>Horizontal Directional Drill Monitoring, Inadvertent Return Response, and Contingency Plan</i> |
| IR | Inadvertent Return of Drilling Fluid to the Ground Surface |
| NEPA | National Environmental Policy Act of 1969 |
| NSF/ANSI | NSF International/American National Standards Institute |
| Procedures | <i>Wetland and Waterbody Construction and Mitigation Procedures</i> |

1.0 INTRODUCTION

The Environmental Staff of the Federal Energy Regulatory Commission's (FERC or Commission) Office of Energy Projects has prepared this guidance document to assist industry professionals with the development of *Horizontal Directional Drill¹ Monitoring, Inadvertent Return Response, and Contingency Plans* (HDD Plan). We² believe that this guidance will help industry professionals improve the quality and consistency of their HDD Plans and, as a result, increase the efficiency and effectiveness of the Commission's environmental review and reduce the need for supplemental data requests.

This guidance does not substitute for, amend, or supersede the Commission's regulations under the *Natural Gas Act* or the Commission's and Council on Environmental Quality's regulations under the National Environmental Policy Act of 1969 (NEPA). It imposes no new legal obligations and grants no additional rights. We use non-mandatory language such as "recommend," "should," and "may" to describe Commission staff's recommendations that will help the Commission meet its obligations under NEPA. We use mandatory language such as "required," "must," and "must not" to describe controlling requirements under the terms and statutes and regulations.

This guidance discusses our preferred format for certain documents and data presentation. However, an alternative approach can be used if it satisfies the requirements of the applicable statutes and regulations. We composed this manual to be useful to all applicants proposing HDD construction. But because each project is unique, it is not possible to provide guidance that applies to all possible scenarios. Some of the guidance provided herein may not be appropriate for the scope of a proposed project. Each HDD Plan should be prepared in consideration of project-specific issues, impacts, and public and agency comments.

We encourage projects with HDDs constructed under the automatic provisions of the FERC's regulations to adopt the mitigation measures outlined within this document; however, there is no requirement for those project applicants to file the HDD plans.

To see how various HDD-related issues have been previously addressed, Companies may refer to other recent environmental assessments, environmental impact statements, and Commission orders (available on the Commission's website, www.ferc.gov, and eLibrary). However, we caution Companies not to rely exclusively on these documents given that they deal with specific issues that may not apply generally.

¹ For purposes of this guidance, an "HDD" is considered to be any type of trenchless construction method, including horizontal directional drilling and proprietary technologies, that utilizes drilling fluids under pressure.

² "We," "us," and "our" refer to the environmental staff of the Federal Energy Regulatory Commission's Office of Energy Projects. "You," whether explicit or implied, or "Company" refers to the applicant/company proposing a natural gas project or to the applicant/company's agent(s) who prepares, uses, or reviews these types of environmental documents.

1.1 Overview

The purpose of this guidance is to describe the technical components of an HDD Plan including drilling fluid³ composition and management, monitoring procedures, and response procedures for an inadvertent return of drilling fluid to the ground surface (IR). We also identify and discuss information that is not specifically required by regulation, but is often considered during staff's environmental review.

We provide in this document an outline for an HDD Plan. This format is an effective presentation based on our experience, but is not mandatory and may be modified (including the use of footnotes where necessary for clarification) for individual projects.

2.0 PREPARING HDD PLANS FOR NATURAL GAS ACT APPLICATIONS

The Commission's *Wetland and Waterbody Construction and Mitigation Procedures* (Procedures) at section V.B.6.d requires Companies to file a site-specific plan prior to the beginning of construction for all HDD crossings of wetlands and waterbodies which contains:

- 1) site-specific construction diagrams that show the location of mud pits, pipe assembly areas, and all areas to be disturbed or cleared for construction;
- 2) justification that disturbed areas are limited to the minimum needed to conduct the crossing;
- 3) identification of any aboveground disturbance or clearing between the HDD entry and exit workspaces during construction;
- 4) a description of how an inadvertent release of drilling mud would be contained and cleaned up;
- 5) a contingency plan for crossing the waterbody or wetland in the event the HDD is unsuccessful; and
- 6) how the abandoned drill hole would be sealed, if necessary.

However, information that is not specifically required by regulation, but is often considered during staff's environmental review, should also be considered, provided, and incorporated into these plans, including: crossing-specific geotechnical information and crossing alignments and profiles showing the feasibility of the crossing; a hydrofracture and IR risk evaluation; drilling fluid composition (including the use of drilling fluid additives, and source water identification and analysis) and management; HDD monitoring procedures and document retention; and unique conditions identified along

³ The terms "drilling mud" and "drilling fluid" are used interchangeably within our *Wetland and Waterbody Construction and Mitigation Procedures* and other FERC guidance documents, but an effort has been made herein to only use the term "drilling fluid".

proposed HDD alignments that may increase the risk of HDD construction complications, inadvertent releases, or cause other environmental concerns. We therefore recommend for projects where an HDD is proposed that this information be provided such that it can be analyzed during the project NEPA review. Omissions can cause delays in our processing of applications and increase the need for supplemental data requests.

You should revise the HDD Plan, as necessary, if new information becomes available both during the course of application review and post authorization.⁴ However, because HDD Plan details may affect our analysis of impacts and alternatives, we suggest that the HDD geotechnical investigation; hydrofracture analysis and IR risk evaluation; and source water identification and analysis be provided prior to the final NEPA document. Further, the plan itself may offer suitable mitigation for impacts on resources and may support conclusions provided in the final NEPA document.

Measures described in the HDD Plan may be applicable to all proposed HDD crossings; however, site-specific HDD crossing plans should also be prepared for each crossing, and may be included as an attachment to the HDD Plan (refer to section 4.0).

In HDD Plan preparation, you should ensure that all data are accurate and consistent throughout the HDD Plan and with other application documentation. Lastly, you should use consistent project terminology throughout the HDD Plan and other application documentation.

3.0 HDD PLAN CONTENTS

The below list and the following sub-sections provide a recommended outline for an HDD Plan. This format is an effective presentation based on our experience. It is not mandatory, and the outline should be modified (including the use of footnotes where necessary for clarification), as appropriate, for individual projects.

- Introduction
- Personnel and Responsibilities
- Pre-Construction Activities
- Documentation
- Drilling Fluid Management
- HDD Operational Conditions and Response Actions
- Responding to IRs
- Restoration
- Contingency Planning

⁴ Modifications to an approved HDD Plan may require approval, as a variance request, by the Director of the Office of Energy Projects, or the Director's designee.

3.1 Introduction

You should clearly state the purpose, objectives, and applicability of the HDD Plan, and provide basic information for each crossing. Basic crossing information should include, but is not limited to:

- crossing name, location, and length;
- subsurface conditions;
- sensitive environmental resources crossed or in close proximity; and
- unique features or conditions that may increase risk of drill failure, IR of drilling fluids, or cross contamination by existing sources of contamination.

This information is generally provided within other application documentation; however, it is helpful to Commission staff to consolidate the information within the HDD Plan. Basic information may be sufficiently summarized as shown in example table 3.1-1, below.

| Table 3.1-1 Proposed HDD Locations | | | | | |
|--|----------------------------|------------------------|-----------------------|---------------------|--|
| Crossing Name | Pipeline Diameter (inches) | Approx. Entry Milepost | Approx. Exit Milepost | Total Length (feet) | Subsurface Material |
| Project Component Name | | | | | |
| (Feature crossed or other unique identifier) | | | | | (description of overburden and/or bedrock) |
| | | | | | |
| Project Component Name | | | | | |
| | | | | | |

Additionally, we have provided example tables (tables 3.1-2 and 3.1-3), below, for documenting sensitive environmental resources. You should modify these tables as necessary to also include sensitive environmental resources that are not crossed by the HDD but which could be susceptible to impacts from HDD activities, as determined based on specific project geology or trenchless crossing design.

| Table 3.1-2 HDD Wetland Crossings | | | | | | | |
|-----------------------------------|--------------|------------------|-----------------|----------------|--|------------------------------------|---|
| Wetland ID | Wetland Type | Delineated Acres | Entry (Station) | Exit (Station) | Entry/Exit Elevation Difference (feet) | Depth of Cover ¹ (feet) | Horizontal Setback Distance (Entry/Exit, feet) ² |
| HDD ID | | | | | | | |
| | | | | | | | |
| | | | | | | | |
| HDD ID | | | | | | | |
| | | | | | | | |

¹ Vertical separation between the wetland and the drill alignment
² Distance from the closest edge of the sensitive resource being crossed to the HDD entry and exit locations

| Table 3.1-3 HDD Waterbody Crossings | | | | | | |
|---|---|------------------------|-----------------------|---|--|---|
| Waterbody ID (Name) | Estimated Range of Stream Flow During Crossing (cfs) | Entry (Station) | Exit (Station) | Entry/Exit Elevation Difference (feet) | Depth of Cover¹ (feet) | Horizontal Setback Distance (Entry/Exit, feet)² |
| HDD ID | | | | | | |
| | | | | | | |
| HDD ID | | | | | | |
| | | | | | | |
| ¹ Vertical separation between the bed of the waterbody and the drill alignment | | | | | | |
| ² Distance from the closest edge of the sensitive resource being crossed to the HDD entry and exit locations | | | | | | |

You should also identify or tabulate other unique conditions or features in proximity to the alignment(s) that may increase the risk of drill failure or potential impacts, and measures that would be implemented to minimize any risks to the success of the drill and impacts to nearby and downgradient resources. These features and conditions may include, but are not limited to: existing contamination (including acid mine drainage); artesian groundwater⁵; karst features; subsurface mines; significant grade change; presence of retaining walls; active, abandoned and/or orphan oil and gas wells; specially managed infrastructure (such as levees); and proximity to residences (and basements) or water supply wells.

You should complete a site-specific risk-based assessment at each proposed HDD location in order to identify the presence of these features or hydrogeologic conditions and to determine potential impacts and modify groundwater receptor (well and spring) monitoring protocols to account for the presence of increased risk. Any crossing-specific mitigation measures (such as modified crossing technique, drill monitoring, groundwater monitoring, notification, or IR response procedures) proposed as a result of this risk-based assessment should also be described in corresponding sections of the HDD Plan.

3.2 Personnel and Responsibilities

You should commit to implementation of qualified, responsible oversight (identify the position titles, if known) of HDD activities by contractor⁶ and Company personnel, as well as all associated personnel and environmental inspectors (EI) (and/or monitors) responsible for overseeing HDD activities. These responsibilities include the following:

- implementing the HDD Plan on behalf of the contractor;
- ensuring that workers are properly trained, including knowledge of the procedures for response to an IR;

⁵ Deriving groundwater from a confined aquifer in which the water flows above the ground surface.

⁶ “Contractor” refers to the entity(ies) retained by the Company or another contractor to complete the HDD installations.

- monitoring drilling fluid circulation back to the entry and exit locations;
- communicating loss of drilling fluid circulation status to other project staff;
- stopping or changing the drilling program in the event of an observed or anticipated IR;
- monitoring the HDD alignment for IRs and other signs of environmental impact (such as sinkhole development or subsidence over the alignment);
- notifying regulatory and/or resource agency staff in a timely manner, and responding to these staff regarding observed releases or other impacts in accordance with the HDD Plan; and
- ordering and overseeing corrective actions for an IR or other impacts.

The parties responsible for carrying out compliance with various HDD Plan elements should be clear.

3.3 Pre-Construction Activities

3.3.1 Training

Prior to HDD site set-up, HDD-specific implementation and safety training should be conducted for Company and contractor personnel, including EIs and FERC Compliance Monitors (if applicable). This training should address all applicable environmental impact avoidance and minimization measures that would be implemented during drilling. Each person involved in HDD operations should be familiar with the locations of IR containment equipment and materials, and the specific procedures for handling IRs. The HDD Plan should describe the frequency of training and any circumstances that would result in additional training. The HDD Plan should also describe the scope of the training and training documentation records that would be maintained, and by whom.

3.3.2 Site Inspection

You should inspect each drill path prior to construction. Any site-specific condition(s) that impedes the ability to conduct the visual and pedestrian field inspection of any portion of a drill path should be identified, and a site-specific modification to the proposed inspection routine should be developed for that location. You should incorporate modifications into site-specific HDD crossing plans prior to construction and communicate these modifications to HDD contractors as part of training (section 3.3.1). If unique conditions or features along or in proximity to the alignment(s) are discovered during drill path inspections that may increase the risk of drill complications (e.g., existing contamination; karst features; slope instability; active, abandoned and/or orphan oil and gas wells; utility lines), you should incorporate measures into the HDD Plan that you would implement to minimize these risks.

If such condition(s) are identified post-authorization which require modifications to the approved HDD Plan, a variance may be required, which must be approved by the Director of the Office of Energy Projects, or the Director’s designee, prior to implementation.

3.3.3 Landowner Notification Procedures

The HDD Plan should describe how landowners would be notified of HDD activities, as well as the content and timing of this notification. To facilitate expedited response times in the event of an IR, or to monitor sensitive environmental resources located outside of approved work areas, consider requesting landowner permission in advance to perform pedestrian surveys of any property that may be reasonably traversed to conduct monitoring or response activities (discussed in section 3.6 and 3.7).

3.3.4 Agency Notification Procedures

The HDD Plan should describe how and when regulatory agencies with jurisdiction over the crossing(s) (including the FERC) would be notified of the planned initiation of HDD activities. We recommend that applicable agencies are notified of the anticipated timing and duration of HDD construction prior to commencing drilling operations.

3.4 Documentation

A copy of the HDD Plan should be available and accessible to all construction personnel at each applicable crossing. The HDD Plan should clearly describe other documentation that would be maintained during HDD activities. At a minimum, documentation detailed in table 3.4-1 should be maintained. The HDD Plan should also identify the position titles of personnel responsible for maintaining this information. If requested, you should be prepared to provide this information to the FERC and other federal and state agencies with applicable regulatory jurisdiction.

| Table 3.4-1. Documentation Maintained | |
|--|---|
| Procedure | Documentation |
| Employee Training | Record of employee training detailing when training was conducted, material covered, and employees in attendance. |
| HDD Visual and Pedestrian Monitoring | The personnel monitoring the HDD alignment, location along the HDD alignment visually inspected, time of the examination, and observations of the personnel should be logged following each inspection. |
| HDD Instrument Logs | The contractor should maintain instrumentation logs that document pilot hole progression, drill string axial and torsional loads, drilling fluid discharge rate and pressure, and down-hole annular pressure monitoring during drilling of the pilot hole (or provide alternative monitoring methods and/or best drilling practices to ensure that the drilled and bored [reamed] holes do not become plugged with drill cuttings leading to hydrofracture and IR). |

| Table 3.4-1. Documentation Maintained | |
|--|---|
| Procedure | Documentation |
| Drilling Fluid Composition | Use of loss control materials and other drilling fluid additives, including the quantity, timing, and location of use. |
| | Monitoring logs of drilling fluid physical properties throughout drilling activities (e.g. fluid weight, viscosity, sand content, additives, and pH). |
| | A clear description of the intent to reuse drilling fluid between HDD locations, as well as documented consultation with local and state agencies for such reuse. Laboratory results of sampled drilling fluid/source water for any inorganic and organic environmental contaminants should also be retained. |
| Public and Agency Inquiries/Comments | A record of communication with the public and agencies that has occurred during HDD activities. This record should include inquiries and comments, as well as response actions. |

We recommend that a summary of HDD-specific information be included in construction status reports provided to FERC, including: overall status, a summary of visual and pedestrian monitoring activities, issues encountered (including any IRs) and response actions, and complaints and how they were addressed.

3.5 Drilling Fluid Management

You should develop a drilling fluid management plan that discusses, for each HDD crossing, the source of drilling water, anticipated water volume, and any sampling and laboratory analysis of the water source. Discuss the anticipated fluid losses for each crossing based on geologic conditions present.

3.5.1 Drilling Fluid Additives

The HDD Plan should identify additives that would be mixed with the drilling fluid and include Safety Data Sheets for drilling fluid materials (besides pure bentonite [which does not contain polymer additives] and water) proposed for use during each HDD as an attachment to the HDD Plan. Only non-petrochemical-based, non-hazardous additives that comply with permit requirements and environmental regulations should be utilized. We recommend that proposed additives are NSF International/American National Standards Institute (NSF/ANSI) 60 Drinking Water Treatment Chemicals – Health Effects compliant. In addition, you should indicate the ecotoxicity of each additive mixed in the drilling fluid to the identified toxicity for relevant biotic receptors (e.g., fish). It is important to identify additives for consideration during the project’s NEPA review.

If drilling fluid is sourced from an off-site location (transported from another drill site) or if the water supply is a non-municipal source, the drilling fluid/water source should be tested for environmental contaminants prior to use, and documentation of consultation with local and state agencies regarding the results of such tests be provided.

3.5.2 *Drilling Fluid Physical Properties*

The contractor should monitor the drilling fluid properties (e.g. fluid weight, viscosity, sand content, additives, and pH) during drilling operations. A drilling fluid specialist should be consulted if any changes to the fluid properties are required in order to prevent an IR from occurring or to maintain hole stability for successful completion of the crossing. The HDD Plan should describe the frequency of this monitoring and the documentation that would be maintained.

3.5.3 *Drilling Fluid Disposal*

You should describe the proposed method(s) of drilling fluid disposal. Drilling fluid disposal should comply with the FERC's *Upland Erosion Control, Revegetation and Maintenance Plan* at section III.E and applicable state and local requirements.

3.6 HDD Operational Conditions and Response Actions

In our experience, HDD activities can be characterized by three operating conditions:

- Normal Drilling (full drilling fluid circulation);
- Loss of Drilling Fluid Circulation; and
- Inadvertent Returns.

At a minimum, you should describe drilling and monitoring procedures for each operational condition. Response actions that would be taken in the event of significant⁷ or complete loss of drilling fluid circulation and confirmation of an IR should also be described. This discussion should include how you would determine and communicate a change in operating status, and response actions and reporting procedures for involved parties.

3.6.1 *Drilling Procedures*

To minimize the potential environmental impact associated with a loss or release of HDD drilling fluids, the contractor should employ best efforts to maintain full annular circulation of drilling fluids. The contractor should utilize real-time annular pressure monitoring with the use of a down-hole annular pressure tool throughout pilot hole drilling operations, or provide alternative monitoring methods and/or best drilling practices to ensure that the drilled and bored (reamed) holes do not become plugged with drill cuttings leading to hydrofracture and IR. The contractor should also provide and maintain instrumentation that accurately locates the pilot hole, measures drill string axial and torsional loads, and measures drilling fluid circulation rate and pressure. The contractor should closely and continuously monitor the entry/exit pits to ensure that drilling fluids are circulating to the drilling fluid return pits.

⁷ “Significant” refers to any discernible loss of circulation that could be an indicator of a potential inadvertent return to the ground surface and/or environmental resources including drinking water supplies.

In the event of significant or total loss of drilling fluid circulation, the contractor should notify project inspector(s) and the Company, and should suspend drilling operations and check the drilled alignment for inadvertent returns. Contractor downtime and steps taken to restore circulation should be documented.

If an IR is observed, the EI, the Company, and the FERC Environmental Project Manager and Compliance Monitor (if applicable) should be notified as soon as reasonably possible. In the event of an IR, you should notify other jurisdictional regulatory and resource agencies per permit or consultation requirements and commitments (e.g., Endangered Species Act consultation). The contractor should promptly investigate the IR, employ measures to minimize impacts, and initiate containment measures. Documentation of the IR and clean-up efforts should be maintained; documentation should include date, time, location, estimated volume, and photographs of the containment and cleanup procedures. If public health, safety, and/or sensitive environmental resources are threatened by an IR, or if the amount of an IR exceeds that which can be practically contained and collected by the equipment on-site, drilling operations should be stopped until the threat of additional or increased IRs are eliminated or brought under control.

3.6.2 Monitoring and Pedestrian Surveys

You should fully describe how monitoring of the HDD alignment(s) would be conducted and whether monitoring methods would vary at each crossing. For example, describe if the alignment would be monitored via pedestrian survey, unmanned aerial vehicle, boat, fixed camera, etc. For each operating status, quantify the frequency of monitoring activities and describe the documentation that would be maintained, by whom it would be maintained, and the availability of this documentation.

In developing monitoring procedures, consider the need for additional precautions, including intensified monitoring and inspection protocols, at sensitive environmental resources (e.g., waterbodies and wetlands), and increased frequency of monitoring during lost circulation or following remediation of an IR.

3.7 Responding to IRs

You should describe the procedures that would be followed if an IR is observed surfacing:

1. inside of certificated workspaces;
2. outside of certified workspaces;
3. in inaccessible areas;
4. within wetlands and waterbodies; and
5. within other sensitive environmental resource areas or where other unique conditions exist.

In accordance with the FERC's Procedures at section V.B.6.d.4, you must describe how an IR would be contained and cleaned up. The protocols and measures you would follow to respond to an IR in upland, wetland, and waterbody locations should be described, including for both containment of the release to minimize impact (for example, the prevention of an upland release reaching a wetland or waterbody and restrictions for equipment use and clearing in accessing an IR) and clean-up of a release. You should also describe notification measures for releases in a wetland or waterbody. Include contact information for regulatory agencies with jurisdiction over the wetland/waterbody.

3.7.1 IR Response Materials and Equipment

Equipment and materials required to contain an IR should be available at each HDD entry point and exit point and, if necessary, staged between the entry and exit points such that response time to an IR can be minimized. Examples of expendable materials and equipment to be maintained on site in sufficient supply depending on the extent of sensitive environmental resources at each crossing may include:

- spill sorbent pads and booms;
- straw bales (certified weed-free);
- wood stakes;
- sandbags;
- silt fence;
- plastic sheeting;
- corrugated plastic pipe;
- shovels; and
- push brooms.

Additionally, mechanized and other equipment should be maintained on site or be immediately available to the site depending on the extent of sensitive environmental resources at each crossing and may include:

- centrifugal, trash, and sump pumps;
- vacuum truck;
- rubber-tired or wide-track backhoe;
- skidsteer (if needed);
- storage tanks; and
- floating turbidity curtains for use in large waterbodies.

3.7.2 Accessing Releases off Right-Of-Way and in Inaccessible Areas

The HDD Plan should address procedures you would use to secure landowner permission, obtain the necessary environmental and cultural resource clearances, and obtain the required FERC variances to access and restore affected resources and/or areas that are outside of approved workspaces, or not directly accessible without an approved

workspace variance. You should take proactive steps to seek landowner permissions *in advance*, to limit downtime during drilling operations and expedite environmental response times if an IR occurs. During project development, for HDDs in which hydrofracture analysis, or bedrock conditions, such as highly fractured and/or weathered bedrock or karst-conduit permeability, indicate an elevated likelihood of IR, you should consider expanding the biological and cultural survey corridor and pre-prepare variances for off-right-of-way access in adjacent areas prior to initiating HDD operations (to be filed with the Commission if needed). For inaccessible areas, procedures may also involve attempts to minimize the quantity of drilling fluid lost, visual monitoring of the IR, and criteria for which drilling operations would be suspended until measures are in place to properly respond to the IR.

3.7.3 Releases within other Sensitive Resource Areas

Other sensitive resource areas or conditions may exist that warrant specialized measures for responding to IRs; these should be described in the HDD Plan. These may include, but are not limited to:

- seeps, springs, or water-supply wells;
- cultural resources sites; and
- existing contamination.

Where seeps, springs, or water-supply wells are within 150 feet of any HDD alignment; within 1,000 feet of an HDD through karst terrain; or where a risk-based assessment based on site-specific conditions has indicated that these features could be impacted by HDD operations, you should describe measures to be taken if an IR occurs within or in close proximity to these features. Such measures may include expanding groundwater receptor distance from the crossing, pre- and post- construction testing of the water source for water quality and yield, as well as provisions for providing an alternate supply of water to affected landowners until such time as the water source is remediated to pre-construction conditions for both yield and water quality.

Where a proposed HDD alignment crosses, or is in proximity to, cultural resources eligible or recommended eligible for listing in the National Register of Historic Places, provide a plan consistent with the most recent version of FERC's *Guidelines for Reporting on Cultural Resources Investigations for Natural Gas Projects*, available on the Commission's website.

Where a proposed HDD alignment crosses or is in proximity to known soil or groundwater contamination, the HDD Plan should include measures to prevent the spread of existing contamination during drilling. The HDD Plan should also include measures to handle, manage, and properly dispose of IRs that surface in areas of existing contamination or may otherwise be cross-contaminated.

3.8 Restoration

You should restore all areas affected by IRs to pre-existing conditions and contours to the extent practicable. Upland areas should be restored through typical right-of-way restoration procedures, such as grading, seeding, and temporary and permanent erosion control devices, as necessary. Restoration of wetlands and waterbodies may vary depending on the extent of disturbance during the initial response to the IR. You should solicit recommendations from the appropriate regulatory agencies (e.g., the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, Bureau of Land Management, state permitting agencies) for restoration activities in regulated wetlands and waterbodies.

3.9 Contingency Planning

You should describe the criteria for identifying what would be deemed a failed HDD, and contingencies to address a failure, such as: a new drill path, drill hole abandonment, or alternate crossing measures.

3.9.1 Alternate Crossing Measures

In accordance with the FERC's Procedures (section V.B.6.d.5), you must describe the contingency plan for crossing a waterbody or wetland in the event that an HDD is unsuccessful. In considering the detail of site-specific contingency plans, you should consider the risks of HDD failure and IR (and potentially affected resources), as well as the need to secure permits for alternative crossing methods. You should indicate whether there is a contingency plan for HDD crossings in the event that a drill is unsuccessful or proves infeasible due to drill hole instability and/or loss of drill fluids directly related to, for example, bedrock/overburden transition, coarse unstable materials such as gravel layers, highly fractured and/or weathered bedrock, and karst-conduit porosity/permeability. HDD contingencies may include, for example, defining a new drill path to avoid the problematic area, relocating the crossing, or defining a new trenchless method such as conventional bore or direct microtunnel installation, if feasible. Site-specific contingency plans should be included within an attachment to this plan (refer to section 4.0). Contingency crossing plans should be reviewed and approved by the appropriate permitting and regulatory agencies, including the FERC (per the requirements of the project-specific Order or section IV.A.1 of the Commission's *Upland Erosion Control, Revegetation, and Maintenance Plan*), prior to their implementation.

3.9.2 Abandonment

In accordance with our Procedures (section V.B.6.d.5), you must describe how an abandoned drill hole would be sealed (if necessary). Abandonment procedures should be approved by the appropriate permitting and regulatory agencies prior to their implementation.

4.0 HDD PLAN ATTACHMENTS

4.1 Site-Specific Crossing Plans

Site-specific components may be filed as an attachment to the project HDD Plan (attachment 1) and should be revised as new information becomes available. If conditions are identified post-authorization which require modifications to the approved HDD Plan, requests for variances will require approval by the Director of the Office of Energy Projects, or the Director's designee, prior to implementation.

We recommend that site-specific HDD crossing plans are filed for each proposed HDD (whether or not the drill crosses a wetland or waterbody). Site-specific plans should include a scaled drawing identifying all areas to be disturbed by construction and a listing of any necessary permits, and their status. Each site-specific plan should also incorporate any proposed noise mitigation measures.

Each site-specific HDD crossing plan should contain an HDD plan and profile drawing depicting the geotechnical information (borings) used to characterize the subsurface material along the alignment, or a clear justification why crossing-specific geotechnical borings are not warranted, based on subsurface information collected from nearby investigations. For each planned HDD crossing, the plan and profile drawing should incorporate:

1. site-specific geotechnical investigations used to depict the subsurface lithology along the drill path and the top of the water table (zone of saturation); and
2. standard penetration test results, soil mechanic properties/Atterberg Limits, and rock coring results including core recovery, and rock quality designation for each bedrock core run.

We recommend you conduct geotechnical studies as early in the planning process as practicable to determine whether HDD is a suitable method for the specific crossing location and to facilitate the development of appropriate crossing plans and contingency crossing plans. The scope of the geotechnical investigation (including number and depths of borings) should be contingent upon the length of the proposed HDD, anticipated complexity of subsurface conditions, and sensitive resources in the vicinity.

You should develop and provide an HDD feasibility study conducted by a qualified contractor. Discuss the potential for hydrofracture and an IR using, for example, the U.S. Army Corps of Engineers' Delft method⁸ (or an equivalent method) for crossings through unconsolidated material, and/or a qualitative analysis for an IR through

⁸ *Recommended Guidelines for Installation of Pipelines beneath Levees using Horizontal Directional Drilling*, prepared for U.S. Army Corps of Engineers, Kimberlie Staheli [et al], April 1998.

bedrock utilizing rock quality designation values obtained from bedrock cores and provide the parameters used to conduct hydrofracture analysis.

For each HDD, you should describe subsurface conditions identified by geotechnical investigations that may increase the risk of drill complications (e.g., artesian groundwater, karst conduit porosity/permeability, highly fractured and/or weathered bedrock, potential sources of cross contamination such as abandoned oil/gas wells in the vicinity of the drill alignment). For these subsurface conditions and for any alignment characterized by significant elevation differences between entry and exit points, describe any increased risk of an IR and the measures that would be implemented to minimize the loss of drilling fluids.

If any HDD operations are proposed in karst areas, we recommend that you identify all wells and springs within 1,000 feet of the work areas, describe the degree of karst through desktop assessments, lineament/fracture trace analysis using aerial photographs in stereo pair or Light Detection and Ranging (LiDAR) imagery analysis, field reconnaissance, and site surveys including results of geophysical investigations that were conducted. Based on the results of these studies, you should consider the need for additional landowner notification and an expanded radius for identification and monitoring of water supply wells and springs.

4.2 Safety Data Sheets

As discussed in section 3.5.1, you should include as an attachment (attachment 2) Safety Data Sheets for drilling fluid materials proposed for use during each HDD, including the primary viscosifier (if not pure bentonite).