

Committee for Natural Resources and Environmental Protection of Sakhalin Region

693011 Yuzhno-Sakhalinsk, Mir Prospekt 107-70
Tel: (4242) 498-201, Fax: (4242) 498-216, email: cpr@sakhepr.ru

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To the Manager of the
Administration of Rostekhnadzor
[Russian Federal Service for Ecological,
Technical and Atomic Supervision]
of Sakhalin Region,
D.Y. Yakovlev

Dear Dmitrii Yurievich!

In accordance with the May 8, 2007 order by the Chairman of the Committee for Natural Resources and Environmental Protection of Sakhalin Region (No. 137), and the May 7, 2007 order by the Head of the Department of Forestry and Specially Protected Natural Areas of Sakhalin Region (No. 05-GK), an inclusive review of the fulfillment of nature conservation legislation requirements, and observance of established procedure for the protection of specially protected natural areas during the construction of the main pipeline route for the Sakhalin II project in Makarov Territory and Dolinsky District has been taking place since May 21, 2007.

In the course of the planned review, the members of the commission focused their attention on the consequences of geological processes that a danger to pipeline operation. In some cases they cause alarm and require action to eradicate the negative consequences of these processes.

First of all, this concerns subsidence phenomena in the right-of-way in sections where easily soaked and eroded Bykovskii formation silt-stone is expanding (attachment 3). In the opinion of the commission, these phenomena are caused by suffusion and subterranean erosion along the path of the trench for the laying of the distribution pipeline. Sags in the pipeline, and changes in hydro-geological, frost penetration and ground stability conditions – are possible consequences of these processes.

Second, a no less alarming fact, which was established during the course of the planned review, is a change in the incline of the right-of-way's sloped surfaces as a result of unplanned excavation of the ground, which is creeping downward along the slope. For example, the slopes along the left side of Krinka River have increased 4-8 degrees due to the excavation of several thousand cubic meters of sodden earth which has crept down into the river bed (attachment 2). The quantity of extracted soil was established by the volume of soil dumped along the access route in the water-protection zone at approximately 50 meters above the flow of the river. A change in the geometry of the slope, together with negative consequences due to a change in the depth of the distribution pipeline (the pipes are coming to the surface), can lead to a landslide of several thousand cubic meters and the corresponding aftermath.

The commission focused attention on the negative consequences of the disposal of waste soil along the right-of-way (attachment 2) and beyond its boundaries, on the temporary storage areas (attachment 1). Practically everywhere this waste soil promotes the formation of landslides and mudflows. For example, in the Krasnaya River basin, mudslides can form in channels several meters deep during the drainage of barrier lakes, and bring with them the subsequent activation of landslide phenomena.

We ask you, in accordance with the authority entrusted to the Administration of the Federal Service for Ecological, Technical and Atomic Supervision (Rostekhnadzor) of Sakhalin Region, to examine this information.

Based on the given information, within the framework of the realization of the conditions for agreement regarding the cooperation of the Federal Service for Ecological, Technical and Atomic Supervision and the Administration of Sakhalin Region, we consider it necessary and we propose to conduct, together with the Committee and Department, an unscheduled review of the fulfillment of nature conservation legislation requirements during the construction of the main pipeline for the Sakhalin II project.

Attachments:

1. Order dated May 7, 2007, No. 05-GK, 2 pages, 1 copy;
1. Order dated May 8, 2007, No. 137, 1 page, 1 copy;
2. Attachment 1, 17 pages, 1 copy.
3. Attachment 2, 14 pages, 1 copy.
4. Attachment 3, 15 pages, 1 copy.

Committee Chairman

Department Head

_____ D.V. Goncharenko

_____ S. I. Kotel'nikov

[Translation by Lauren C. Allan-Vail, Pacific Environment]