



June 25, 2014

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Re: ET Rover Pipeline Company LLC
Docket No. PF14-___-000
Rover Pipeline Project
Request to Initiate the FERC Pre-Filing Review Process

Dear Ms. Bose:

Pursuant to pre-filing procedures set forth in 18 C.F.R. §157.21 (2013), ET Rover Pipeline Company LLC ("ET Rover") files this statement of intent to file an application pursuant to Section 7(c) of the Natural Gas Act, 15 USC §717f (2006) for a certificate of public convenience and necessity to construct and operate a new interstate natural gas pipeline to be designated as the Rover Pipeline Project. ET Rover respectfully requests that the Federal Energy Regulatory Commission ("FERC" or "Commission") Director Office of Energy Projects issue a notice approving the use of the FERC Pre-Filing Review Process for the Rover Pipeline Project.

Representatives of ET Rover met with the Commission Staff on May 28, 2014 to discuss the Rover Pipeline Project and their intent to file a Request to Initiate the FERC Pre-Filing Review Process. At the conclusion of the Pre-filing process, ET Rover will file a certificate application pursuant to Section 7(c) of the Natural Gas Act.

The Rover Pipeline Project originated as a result of discussions with producers in the Marcellus and Utica Shale areas of Pennsylvania, West Virginia, and Ohio desiring to move their production to markets in the Midwest and Canada.

The Rover Pipeline Project as currently proposed at 2.2 Bcf per day will consist of approximately 380 miles of 36-inch/42-inch diameter mainline pipeline, the installation of approximately 194,000 horsepower at five new mainline compressor stations, and construction of six new delivery meter stations along the mainline pipeline, and the construction of approximately 197 miles of 24, 36 and 42-inch diameter supply laterals, approximately 38,000 horsepower at five new compressor stations, and various new receipt meter stations in the supply

areas¹. ET Rover has executed precedent agreements with anchor shippers representing 1.2 Bcf per day and expects to have shippers' commitments for 1.9 Bcf per day prior to the initiation of the Open Season. The remaining capacity will be marketed to shippers during the Open Season which concludes on July 25, 2014. ET Rover is evaluating additional scenarios with the overall pipeline capacity of up to 3.25 Bcf per day.

In compliance with 18 C.F.R. Section 157.21(d) of the Commission's Regulations related to Pre-Filing procedures, ET Rover submits the following:

1. A description of the schedule desired for the project including the expected application filing date and the desired date for Commission approval.

ET Rover anticipates submitting its certificate application in January 2015 or as soon as the Commission Staff is in agreement that ET Rover's draft Resource Reports are complete. ET Rover intends to request in its application that the Commission issue an Order granting a certificate of public convenience and necessity by November 2015. This FERC Order date is necessary so that transportation services from the supply laterals to the Midwest Hub delivery points are in-service by December 2016. The Project segment from the Midwest Hub to the Union Gas Dawn Hub, Ontario, Canada, is proposed to be placed in-service in June 2017. ET Rover will submit a complete draft of Resource Report No. 1, a list of alternatives, and a list of affected landowners within 30-days of the FERC notice approving the use of the Pre-Filing Review Process. Provided below is the desired schedule for the Rover Pipeline Project.

• Submit FERC Pre-Filing Review Process Request	June 2014
• File NGA Section 7(c) Application	January 2015
• Issuance of FERC Order	November 2015
• File Initial Implementation Plan	December 2015
• Commence Construction	January 2016
• Supply Area to Midwest Hub In-Service	December 2016
• Midwest Hub to the Union Gas Dawn Hub In-Service	June 2017

2. For LNG terminal facilities, a description of the zoning and availability of the proposed site and marine facility location.

Not Applicable.

¹ The project scope currently reflects all potential mainline, supply laterals and associated compression facilities that are being discussed with interested shippers. However, upon completion of the open season, ET Rover will determine the final overall scope for the project.

3. *For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, an explanation of why the prospective applicant is requesting to use the pre-filing process under this section.*

ET Rover is seeking to use the FERC Pre-Filing Review Process to provide environmental records and assistance to FERC Staff's processing of its proposed certificate application. The FERC Staff's early review of the environmental documentation and its participation in ET Rover's public participation plan will facilitate the development of a complete record to support the conclusion that the Rover Pipeline Project is in the public convenience and necessity, and permit the project to receive timely approval. In particular, ET Rover believes that the Pre-Filing Review Process will be beneficial in the following ways:

- Assisting ET Rover in developing initial information about the proposal and identifying affected parties.
- Facilitating issue identification, study needs, and issue resolution.
- Conducting site visits, examining alternatives, meeting with agencies and stakeholders and participating in public information meetings (Open Houses).
- Reviewing and commenting on the draft Resource Reports for the certificate application.

4. *A detailed description of the project, including location maps and plot plans to scale showing all major plant components that will serve as the initial discussion point for stakeholder review.*

ET Rover will hold an open season from June 27, 2014 to July 25, 2014 to assess and further quantify market demand for the proposed Rover Pipeline Project. The results of this open season will be incorporated into the overall facility design identified below and will be used to continue agency and landowner consultation, environmental and civil surveys, and preparation of the documentation required for the certificate application.

Due to shipper commitments, the Rover Pipeline Project facilities will be constructed with phased in-service dates of December 2016, and June 2017, respectively. The in-service date of December 2016 will include the following project facilities between the supply areas in Ohio, Pennsylvania, and West Virginia to the Midwest Hub.

PIPELINES	<u>Miles</u>	<u>Diameter</u>	<u>Capacity/Volume</u>
Mainline - Leesville Plant to Midwest Hub	186	42-inch	2.2 Bcf/d

PIPELINES (<i>Continued</i>)	<u>Miles</u>	<u>Diameter</u>	<u>Capacity/Volume</u>
Supply Laterals (<i>including Alternate Routes</i>)			
Cadiz Plant to Leesville Plant	16	42-inch	
Hillman Plant to Leesville Plant	46	36-inch	
Clarington to Cadiz Plant	43	42-inch	
Majorsville Lateral	18	24-inch	
Seneca to Clarington	25	36-inch	
Sherwood to Clarington	49	36-inch	

COMPRESSION

Approximately 194,000 horsepower at five (5) new mainline compressor stations to be located on the Leesville Plant to Midwest Hub Plant mainline route.

Mainline Compressor Stations

- Carroll County CS
- Wayne County CS
- Richland County CS
- Seneca County CS
- Defiance County CS

Lateral Compressor Stations

Approximately 38,000 horsepower at five (5) new compressors to be located on supply laterals.

- Harrison County CS
- Monroe County CS
- Doddridge County CS
- Noble County CS
- Marshall County CS

METER STATIONS

- Receipt Meters – Various in supply area
- Delivery Meter - Midwest Hub-PEPL
- Delivery Meter - Midwest Hub-ANR

The in-service date of June 2017 will include the following project facilities between the Midwest Hub to the Union Gas Dawn Hub, Ontario, Canada.

PIPELINES	<u>Miles</u>	<u>Diameter</u>	<u>Capacity/Volume</u>
Michigan Market Zone – Midwest Hub to the International Border	179	42-inch	1.3 Bcf/d
Canadian Market Zone – International Border to Dawn	15	36-inch	1.0 Bcf/d

METER STATIONS

- Delivery Meter – Consumers Energy
- Delivery Meter – Vector
- Delivery Meter – Michigan Consolidated
- Delivery Meter – Union Dawn

A Project Map of the proposed facilities representing the Rover Pipeline Project is submitted under Appendix B.

5. *A list of the relevant federal and state agencies in the project area with permitting requirements. For LNG terminals facilities, the list shall identify the agency designated by the governor of the states in which the project will be located to consult with the Commission regarding state and local safety considerations. The filing shall include a statement indicating:*

- (i) *That those agencies are aware of the prospective applicant's intention to use the pre-filing process (including contact names and telephone numbers);*

Please see the Agency Contact Table submitted under Appendix A that identifies the relevant federal and state environmental agencies in the proposed project area with permitting requirements and the status of contact with those agencies. The agencies have been asked to indicate whether they were willing to participate in the pre-filing review process.

Whether the agencies have agreed to participate in the process;

Please refer to the Agency Contact Table submitted under Appendix A for a summary of the participation commitment indicated to date.

- (ii) *How the applicant has accounted for agency schedules for issuance of federal authorization;*

During communications with the identified agency personnel, permitting requirements were discussed in general terms with the understanding that ET Rover would conduct pre-application meetings with each agency to fully discuss agency permitting requirements. ET Rover believes that all federal and state environmental permitting requirements can be completed concurrently with the proposed certificate schedule. ET Rover anticipates scheduling these meetings during or near the timeframe of the Open House meetings.

- (iii) *When the applicant proposes to file with these agencies for their respective permits or other authorization.*

After pre-application meetings, ET Rover will submit to FERC Staff an execution plan that addresses all required permitting by state, including the proposed schedule for the issuance of permits. ET Rover will submit the required permit applications within timeframes that allow those permits to be received prior to conducting any activities related to those permits.

6. *A list and description of the interest of other persons and organizations who have been contacted about the project (including contact names and telephone numbers).*

ET Rover will contact the affected county commissioners and legislators prior to conducting an Open House and/or other public outreach efforts. In addition, ET Rover will research state and local resources for other possible interested parties and/or organizations.

7. *A description of what work has already been done, e.g., contacting stakeholders, agency consultations, project engineering, route planning, environmental and engineering contractor engagement, environmental surveys/studies, and open houses. This description shall also include the identification of the environmental and engineering firms and sub-contractors under contract to develop the project.*

Landowner Contacts:

ET Rover is contacting landowners along the route in order to obtain permission to conduct civil, biological, and cultural surveys, as well as wetland delineations. These contacts commenced in May 2014, and continue at this time. ET Rover is now processing ownership data, and plans to contact landowners over the next two months to advise them of the Rover Pipeline Project status. ET Rover will invite all landowners to Open Houses that will be held in the early July 2014.

Agency Consultations:

See the Agency Contact Table submitted under Appendix A.

Engineering/Route Planning/Environmental:

ET Rover has identified a preliminary route for the proposed pipeline project that maximizes the use of existing pipeline, powerline, roadway, and railroad right-of-ways. This route was developed by preliminary engineering and environmental feasibility studies. Approximately 80% of the mainline parallels existing pipelines, power lines, or existing roads.

ET Rover has the following firms under contract performing work on the project:

Engineering: Project Consulting Services
 Survey: Gullett & Associates and Survey and Mapping, Inc.
 Environmental: TRC Solutions
 Right-of-Way: Willbros, Gullett & Associates, and Contract Land Staff

Open Houses:

ET Rover has identified the following locations to hold Open Houses for the project.

Town	County	Tentative Date/Team
New Martinsville, WV	Wetzel	July 8, Team 1
Imperial, PA	Allegheny	July 8, Team 2
Woodsfield, OH	Monroe	July 9, Team 1
Wooster, OH	Wayne	July 9, Team 2
Cadiz, OH	Harrison	July 10, Team 1
Tiffin, OH	Seneca	July 10, Team 2
Defiance, OH	Defiance	July 14, Team 1
Fenton, MI	Genesee	July 14, Team 2
Chelsea, MI	Washtenaw	July 15, Team 1
Richmond, MI	St. Clair	July 15, Team 2

ET Rover will coordinate with the FERC OEP Staff to establish a final list of Open House meeting locations and dates.

8. *For LNG terminal projects, proposals for at least three prospective third-party contractors from which omission staff may make a selection to assist in the preparation of the requisite NEPA document.*

Not Applicable.

9. *For natural gas facilities other than LNG terminal facilities and related jurisdictional natural gas facilities, proposals for at least three prospective third-party contractors from which Commission staff may make a selection to assist in the preparation of the requisite NEPA documents, or a proposal for the submission of an applicant-prepared draft Environmental Assessment as determined during the initial consultation described in paragraph (c) of this section.*

ET Rover solicited proposals from seven third-party environmental contractors to provide assistance to FERC OEP Staff in the preparation of the required NEPA document. ET Rover is submitting under separate cover with this Pre-Filing Request proposals from three third-party contractors that returned comprehensive proposals for FERC Staff review and selection.

10. *Acknowledgement that a complete Environmental Report and complete application are required at the time of filing.*

ET Rover acknowledges that a complete Environmental Report and a complete certificate application are required at the time of filing.

11. *A description of a Public Participation Plan which identifies specific tools and actions to facilitate stakeholder communications and public information, including a project website and a single point of contact. This plan shall also describe how the applicant intends to respond to request for information from federal and state permitting agencies, including, if applicable, the governor's designated agency for consultation regarding state and local safety considerations with respect to LNG facilities.*

Public Participation Plan:

ET Rover is committed to stakeholder communications and effective public outreach on this project and has identified the following methods of communication with stakeholders:

Website – ET Rover has initiated a project specific website available to the public to provide constantly updated project materials and information. The web site link is as follows:

www.energytransfer.com/ops_etrover.aspx

In addition to the website, regular mailings and/or newsletters will be provided to affected landowners near the proposed project.

Direct Contact- ET Rover will use direct contact, in person, by phone, or by e-mail and/or letter correspondence for various stakeholders throughout the project, as appropriate. Direct contact will allow ET Rover to respond to requests and inquiries from either federal, state and/or local agencies. In addition, ET Rover will be available to meet with local groups/associations and agencies to discuss the project as necessary.

Open Houses – ET Rover has identified ten sites to hold Open House meetings along the proposed route. Stakeholders along the route will be invited to participate both directly with invitations and indirectly through the media. The final locations and dates will be determined in consultation with FERC Staff.

In its communication with landowners, ET Rover has recommended that their first point of contact should be with their local assigned right-of-way agent whose name, phone number, and email address is provided in the correspondence. ET Rover is also providing with its correspondence a toll free phone number and accessible email address. The contact is:

Rover Pipeline Project

Ms. Erica Richardson, Administrative Assistant, Regulated Projects

eMail: erica.richardson@energytransfer.com

Toll-Free No.: +1 (888) 844-3718

12. Certification that a Letter of Intent and a Preliminary WSA have been submitted to the U.S. Coast Guard or, for modifications to an existing or approved LNG terminal, that the U.S. Coast Guard did not require such information.

Not Applicable.

Any questions regarding this request should be directed to Stephen Veatch, Senior Director Certificates at (713) 989-2024 or e-mail at stephen.veatch@energytransfer.com.

Finally, it is important that the FERC recognize that ET Rover is committed to:

- Identifying stakeholder issues or concerns regarding the Rover Pipeline Project.
- Resolving such issues before filing its application.
- Providing the FERC with a complete application.

Respectfully submitted,

ET ROVER PIPELINE COMPANY LLC

/s/Stephen T. Veatch

By: _____

Stephen T. Veatch
Senior Director Certificates
Government & Regulatory Affairs

Enclosures

CC: Ms. Lauren O'Donnell, FERC – OEP
Mr. Michael McGehee, FERC – OEP
Mr. Rich McGuire, FERC – OEP
Mr. James Martin, FERC – OEP
Ms. Kara Harris, FERC – OEP

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Appendix A
Agency Contact Table

ET Rover Pipeline Company LLC
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Appendix B
Project Map