

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:

OEP/DG2E/Gas Branch 3
ET Rover Pipeline LLC
Rover Pipeline Project
Docket No. PF14-14-000
§ 375.308(z)

August 29, 2014

Mr. Kelley Allen
Regulatory Affairs
ET Rover Pipeline LLC
1300 Main Street
Houston, TX 77002

Re: Comments on Preliminary Draft Resource Reports 1 and 10

Dear Mr. Allen:

Enclosed please find our comments on the preliminary draft Environmental Resource Reports 1 (project description) and 10 (summary of alternatives) provided by ET Rover Pipeline LLC (ET Rover) for the planned Rover Pipeline Project (Project). The enclosed comments should be addressed in the subsequent draft resource reports filed for this Project. With the next round of draft resource reports, ET Rover should include a matrix that identifies the specific locations in the resource reports (i.e., section and page number) where the information requested in these comments may be found. If any comments provided in the enclosure are addressed in another resource report, be sure to include a cross-reference in your response. Note that our comments generally do not include items that ET Rover has already noted as “to be provided in subsequent filings” or as “to be determined.” **You should be aware that ET Rover needs to provide the planned locations of all Project facilities in order for us to schedule public scoping for the Project.** This information can come in the form of updated draft resource reports or other supplemental filings, as appropriate.

When filing documents and maps, be sure to prepare separate volumes, as outlined on the Federal Energy Regulatory Commission’s web site at <http://www.ferc.gov/help/filing-guide/file-ceii/ceii-guidelines.asp>. Any plot plans showing equipment or piping details or other Critical Energy Infrastructure Information should be filed as non-public and labeled “**Contains Critical Energy Infrastructure Information – Do Not Release**” (18 CFR 388.112). Thank you for your cooperation. If

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you have any questions, please call me at 202-502-6296. For all materials submitted, in addition to the copies filed with the Secretary of the Commission, please provide an electronic and hard copy directly to our third-party environmental contractor, Cardno ENTRIX (to the attention of Jennifer Ward).

Sincerely,

Kara Harris
Environmental Project Manager
Gas Branch 3

Enclosure

cc: Public File, Docket No. PF14-14-000

ENCLOSURE

ET Rover Pipeline Company LLC
Docket No. PF14-14-000

ENVIRONMENTAL INFORMATION REQUEST

Docket No. PF14-14-000

Resource Report 1

1. General – Update the alignment sheets to include:
 - a. project mileposts with tenth of a mile markers (e.g., small hash marks along the centerline);
 - b. temporary work space and staging areas;
 - c. construction and permanent right-of-way;
 - d. compressor stations;
 - e. meter stations;
 - f. mainline valves; and
 - g. access roads.
2. General – Provide Project-specific versions of the Commission’s Upland Erosion Control Revegetation, and Maintenance Plan (Plan) (May 2013 version) and Wetland and Waterbody Construction and Mitigation Procedures (Procedures) (May 2013 version), as appropriate. Bold the font of text that is modified from the FERC Plan and Procedures. Include a table with all requested deviations from the FERC Plan and Procedures. Describe the planned mitigation measures and best management practices that would be implemented during construction and operation of the Project throughout the resource reports (RR). Finally, update Section 1.6.1.1 (page 1-19) to state that water removed from the trench would be pumped to an upland area **and** filtered through a filter bag or siltation barrier, versus pumped to an upland and/or filtered.
3. General – Update RR 1 to include: a description, maps, and any available environmental information for any non-jurisdictional facilities and jurisdictional facilities built by others that would be constructed in association with the Project. Note that environmental information on all areas that would be disturbed should follow throughout the document.

4. General – Describe the cathodic protection system that would be installed as part of the Project and provide acres of impact (construction and operation) by land use type.
5. General – Verify whether the Cadiz Lateral will be one 42-inch-diameter pipeline or dual 42-inch-diameter pipelines.
6. General – Identify and describe all other existing pipelines (type, size, approximate depth and distance from planned activities) within the planned Rover Pipeline Project workspace(s) and the measures that ET Rover would implement to ensure their integrity.
7. General – Consult with land managing agencies and state and local planning agencies to identify the location, timeframe, and type of projects (e.g., roads, bridges, mining, large commercial/industrial/residential developments) in the potential resource areas of impact, as referred to in the table below, that could be affected by the Rover Project. Include a table in Section 1.12 that includes:
 - a. the project type/name and county;
 - b. approximate distance and direction from the planned facilities;
 - c. a description of the development; and
 - d. the current status and schedule of the development (e.g., proposed for October 2015, under construction, completed).

Include a detailed discussion of cumulative impacts these projects and the Rover Project would have on each environmental resource and the measures that ET Rover would implement to minimize cumulative impacts. Include a map showing these developments in relation to the Rover Project.

Environmental Resource	Area of Impact (AOI)
Surface Waters, Wetlands, Groundwater, Vegetation, Wildlife & Fisheries (including T&E and Migratory Birds), Soils, Geology	Hydrologic Unit Code 12 Watersheds.
Cultural	Overlapping impacts on historic properties.
Land Use (including visual and residential)	0.5 mile. For other projects requiring more than 10 acres of land, use 5 miles.
Noise	Overlapping noise-sensitive areas (0.5-mile).
Air Quality	County (pipeline and stationary sources). For stationary sources near a county border the AOI is a 50-kilometer radius from the source.
Socioeconomics	Impacted counties.

8. General – Identify whether communication towers or remote blowdowns are planned for the Project. If so, provide the locations, acres of impact (construction and operation) by land use type, and other appropriate environmental information.
9. General – Update RR1 to include an environmental complaint resolution procedure for the Project. This procedure should include:
 - a. the length of time it would remain active;
 - b. how the landowner or complainant would be informed of the procedures; and
 - c. who the landowner or complainant should contact if environmental issues arise during and after construction and restoration.
10. General – Update RR1 and throughout the other RR, as applicable, to address comments received during pre-filing, including comments received at the Open House meetings and filed in the docket, see related comments in RR10 below.
11. General – Update RR1 to indicate whether any known mining has occurred generally in the Project area and specifically at the location of planned aboveground facilities. If mining has occurred, provide details on the type of mining, above or underground, timeframe of last known active mining activities, and post-mining restoration actions. Carry the discussion throughout the applicable RR.
12. Section 1.1 (page 1-1) – Reconcile the discrepancy between this section and Section 10.1 of RR 10 regarding the number of miles of pipeline planned for the Project.
13. Section 1.2 (page 1-2) – The Purpose and Need section should be expanded to adequately present the delivery points of natural gas (also relevant to Section 10.2). The locations of these delivery points should indicate routing nodes that define, generally, the locations for the pipeline segments and/or meter stations.
14. Section 1.3.1 (page 1-5) – In relation to the dual pipelines, update RR1 to include details on the timeframe between installation of the first 42-inch-diameter pipeline and the second. Also provide a discussion on the types of restoration measures that could occur after the first 42-inch-diameter pipeline is installed but prior to the installation of the second, and how these measures would be consistent with the FERC Plan (i.e., the seeding and backfill timeframe, etc.).
15. Section 1.3.1 (page 1-5) – Provide a record of consultation with the companies that own the existing transmission lines parallel or adjacent to the planned Project rights-of-way. If consultation has not yet occurred, provide a timeframe for which it is anticipated. Also, update RR1 to include a table presenting all areas of

collocation with existing rights-of-way and any planned offsets. The table should be organized by each collocated facility and include:

- a. type of existing utility;
- b. start and end project mileposts;
- c. parallel distance (in feet);
- d. width of existing right-of-way (in feet);
- e. width of existing right-of-way to be used for construction (in feet);
- f. width of existing right-of-way to be used for operation (in feet);
- g. width of offset; and
- h. cross-reference to an alignment sheet corresponding to the area of collocation.

16. Section 1.3.2.1 (page 1-7) – Update the section to include figures depicting each aboveground facility site on aerial imagery and topographic backgrounds, and site plot plans. These plot plans should include all facilities within the fence line, including pig launcher/receivers. For each compressor station facility, provide:

- a. the amount of land required for construction, including access roads, laydown areas, and other disturbed areas;
- b. the amount of land required for facility operation, including access roads, communication facilities, and other permanently disturbed areas;
- c. the post-construction land use conversion by quantifying:
 - i. industrial/commercial use (i.e., encumbered by physical structure or pavement),
 - ii. dirt/gravel (i.e., roadway),
 - iii. open land (i.e., lawn), and
 - iv. other as applicable;
- d. the height of any planned emission stacks; and
- e. a description of the type, size and color scheme of the station and all other support buildings under consideration at these sites.

17. Section 1.3.4 (page 1-10) – Update the section to include the general status of the field surveys and include specific information on the status, methodology, results, and agency review in each appropriate RR.
18. Section 1.3.4 (page 1-10) – Update the section to include the percentage of parcels where survey permission has been granted and any changes in the landowner list. Keep the FERC apprised regarding the percentage of parcels where survey permission has been granted and any changes in the landowner lists in each monthly report.
19. Section 1.3.4 (page 1-10) – The section states that noise surveys would be conducted at the compressor stations and HDD sites. Confirm that noise surveys would also be conducted at meter station sites.
20. Table 1.4-1 (page 1-11) – Footnotes 3 through 8 are missing from the table. Footnote 2 of the table states that the Project area has “...(a) predominance of agricultural land.” Clarify whether ET Rover would employ full-time agricultural inspectors during and after Project construction. Also update RR1 to include a discussion on the need for state-specific agricultural impact mitigation agreements (AIMA) and associated agency correspondence/records of discussion with the state Departments of Agriculture, the state Farm Bureaus, and other interested state and local agencies concerning the AIMA. If an AIMA is not required for all states, provide a detailed discussion on construction in agricultural areas during wet weather. The discussion should include the:
 - a. allowable depth of rutting and allowable working conditions before construction activities being suspended;
 - b. designation of authority for the on-site agricultural inspector to have “stop-work” authority in the event of wet weather conditions that may place topsoil at risk; and
 - c. identification of alternative construction procedures to enable construction to continue without risking the loss and/or mixing of topsoil in the event of an unseasonably wet construction season.
21. Section 1.4.1.1 (page 1-12) – Update RR1 to include site-specific plans for the use of 100 feet of construction right-of-way to install the planned 42-inch-diameter pipeline and 125 feet of construction right-of-way to install the dual 42-inch-diameter pipelines in emergent and scrub-shrub wetlands instead of the conventional 75 feet. Also, provide a table that presents the planned construction right-of-way width by Project milepost and corresponding pipeline length (in feet). Also clarify that the 150-foot right-of-way width requested for agricultural lands to accommodate full right-of-way topsoil segregation is sufficient and additional

temporary workspace would not be required for construction and installation across these lands, per section IV.A of FERC's Plan.

22. Section 1.4.1.2 (page 1-14) – Update RR1 to include general information on additional temporary workspace that would be required, including:

- a. road and railroad crossings;
- b. wetland and waterbody crossings;
- c. areas with steep slopes (greater than 25 percent) and side slopes;
- d. areas requiring topsoil segregation (not in agricultural lands);
- e. equipment turnarounds and spread move-arounds;
- f. hydrostatic test water withdrawal and discharge locations;
- g. pipeline crossings;
- h. horizontal directional drill entry and exit points; and
- i. equipment and material staging.

Provide the dimensions and locations for all of the above.

23. Section 1.4.1.3 (page 1-15) – Update RR1 to include a detailed table for access roads. The table should include:

- a. access road ID;
- b. Project milepost;
- c. county/state;
- d. indicators for:
 - i. existing or proposed and
 - ii. temporary or permanent;
- e. primary land use type;
- f. road width in feet and length in miles;
- g. justification/need for the access road (in particular, provide a thorough need for roads that have any portion classified as open water, wetland, or upland

forest and areas where an access road is planned within close proximity to another access road/s); and

h. acres of impact.

24. Section 1.4.2 (page 1-16) – The section states that “ET Rover will purchase or lease land for aboveground facilities.” Verify whether ET Rover intends to seek lease agreements. If so, provide information on the terms of such leases related to the duration of the lease relative to the life of the Project and whether facilities would be abandoned or disassembled and removed at the end of the lease term.
25. Section 1.4.2 (page 1-16) – Note that sound screening (i.e., mitigation) may be needed at the compressor station sites in addition to “visual screening”.
26. Section 1.5.1 (page 1-16) – Update the section to include the estimated number/percent of construction workers to be hired locally. Also provide a table that presents the peak estimate workforce and duration (month and year) for construction. The table should also include:
 - a. project component or spread;
 - b. county/state;
 - c. start and end mileposts; and
 - d. length (in miles).
27. Section 1.6.1 (page 1-18 and throughout the resource reports) – How will trees be felled? By hand or mechanical means? Will trees felled in winter be left in place until spring or will they be removed/processed during the winter? If they are to be cut and removed with heavy equipment during the winter, erosion controls must be installed, monitored, and constructed to withstand spring snowmelt, per section III.I of FERC’s Plan.
28. Section 1.6.1 (page 1-18 and throughout) – Consider that slopes less than 30% grade may also be considered “steep” for construction and erosion control purposes. How much side-slope construction is anticipated and where is it anticipated to occur (provide milepost ranges)?
29. Section 1.6.1.1, Backfilling (Page 1-21) – Update RR1 to include the:
 - a. maximum particle size allowed during trench backfill; and
 - b. location of pipeline areas with steep slopes and very high water tables (as evidenced by surface seeps).

30. Section 1.6.1.1 (page 1-22) – Update RR1 to include information on the source, volume, and discharge of hydrostatic test water.
31. Section 1.6.1.4 (page 1-26) – Update RR1 to include the geotechnical feasibility studies for all horizontal directional drill locations.
32. Section 1.6.1.7 (page 1-29) – Identify all buildings within 50 feet of construction work areas and provide a site-specific construction plan for all residences within 50 feet of these areas.
33. Section 1.6.1.9 (page 1-29) – Update the section to include rock windrow parameters.
34. Section 1.6.1.10 (page 1-30) – Update the text to reflect the identified blasting locations and include a general Blasting Plan in RR 6. Also, include discussions of the potential for blasting to cause impacts to the specific resource and planned mitigation within each applicable RR. In particular, attention should be given to:
 - a. geology;
 - b. soils;
 - c. wetlands/waterbodies;
 - d. residences and associated infrastructure (e.g., wells, septic, sewer);
 - e. fish, wildlife, and vegetation; and
 - f. noise.

Confirm whether any permits would be needed for blasting in Pennsylvania, Michigan, Ohio, or West Virginia. Update the associated text and Table 1.10-1 (page 1-36) as appropriate.
35. Section 1.6.1.10 (page 1-30) – Update the text to include a discussion of whether foreign sand/gravel would be used as part of the packing of blasting charges, especially within waterbodies or wetlands.
36. Section 1.10 (page 1-37) – Update RR1 to include a summary of the current status of ET Rover’s consultations with each agency and provide current documentation of consultations for the Project. Include a summary or provide documentation of any agency discussions/consultations in each monthly report to the FERC.
37. Section 1.11 (page 1-40) – Update the text on non-jurisdictional facilities to describe the transmission lines, pipelines, or other utilities (if any) that would need to be constructed to serve the Project or be re-routed to avoid the planned Project.

Resource Report 10

1. General – In the revised RR10, establish fixed points for delivery of contracted gas (nodes) and discuss the range of feasible locations for each. Indicate the possible alternative routes for connecting pipeline segments between these nodes and back to established receipt points. For each compressor station, indicate how far (in miles) up or down the pipeline that the location could be moved and still satisfy the engineering constraints.
2. General – Identify and include discussions of route variations and alternative sites for the planned compressor stations and meter stations. Include a comparison table and associated figures for each alternative compared to the corresponding planned feature.
3. Section 10.4 (page 10-4) – Update RR10 to include a discussion on whether any other existing or proposed (and currently viable) pipeline projects in the vicinity, including those identified in Table 1.10-1, could be looped within its own system or combined with the Rover Pipeline Project into a shorter route (e.g., through looping, combining projects, unsubscribed capacity, etc.). If applicable, provide as many of the factors listed in table 10.2-1 of FERC’s Guidance Manual for Environmental Report Preparation as can reasonably be calculated or obtained from published sources, databases, agency consultations, or consultations with the company or operator for each system alternative evaluated.
4. Sections 10.5. Tables (pages 10-8, 10-10 and 10-12) – Update the tables and corresponding text to reconcile number discrepancies. Specifically, the text on page 10-12 refers to table 10.5-4 for a comparison of the Oakland Alternative, while the table on the same page is titled as Table 10.5-2, which is the table number for the Canton Alternative comparison table. Provide a definition for the term “connector”. Finally, update each of the tables to include:
 - a. areas of collocation;
 - b. right-of-way requirements:
 - i. construction; and
 - ii. operation.
 - c. acres of impacts required for construction and operation by land use type including but not limited to the following categories:
 - i. wetlands by type (e.g., PSS, PFO, PSS);
 - ii. upland forest; and

- iii. agricultural lands,
 - d. number of each of the following that would be crossed:
 - i. cultural resources;
 - ii. roads;
 - iii. railroads;
 - iv. property owners; and
 - v. residences within 50 feet of the centerline.
 - e. nearest noise sensitive area (NSA); and
 - f. crossing distance and area of disturbance for any special use land areas crossed.
- 5. Section 10.6 (page 10-13 and throughout the resource report) – Update the section to address comments received during pre-filing. Including but not limited to the following suggested areas to avoid:
 - a. Northwest State Community College;
 - b. Dennis farm;
 - c. Kugler property – old growth oak and hickory forest; and
 - d. Roth property – reclaimed well pad.
- 6. Section 10.7 (page 10-13 and throughout the resource report) – Describe how the planned and alternative compressor station locations address stakeholder concerns about potential sound, visual, and perceived safety impacts to the extent feasible. Evaluate site topography and vegetation (i.e., trees) as potential sound and visual buffers relative to the nearest noise sensitive areas and residents. Include all information for the sites in the comparison table included in Section 10.4 of the FERC’s Guidance Manual for Environmental Report Preparation.
- 7. Section 10.7 (page 10-13 and throughout the resource report) – Update RR10 to include a detailed discussion on each alternative site and include a discussion on the justification for the size of the parcel to be purchased (e.g. landowner easement negotiation). Also for each, quantify and characterize the land types of the area of impact both pre- and post-construction.

Document Content(s)

Allen PF14-14-000_EIR_1.DOC.....1-12