



Charter Township of Brandon

395 Mill St. PO Box 929

Ortonville, Mi. 48462

www.brandontownship.us

Kathy Thurman, Supervisor
Candee Allen, Clerk
Terri Darnall, Treasurer
Dana DePalma, Trustee
William DeWitt, Trustee
Ronald Lapp, Trustee
Jayson Rumball, Trustee

ORIGINAL

August 15, 2014

PF 14-14-000

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE, Room 1A
Washington, DC 20426

Dear Ms. Bose:

The enclosed resolutions have been filed electronically as comments in reference to Docket #PF14-14-000. They have been filed under one comment even though there are two separate resolutions. Please let me know if I need to do anything further to insure that these comments become part of the file for this docket.

Sincerely,

Kathy Thurman, Supervisor
Brandon Township

/enc.

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SECRETARY OF THE
COMMISSION
2014 AUG 26 A 9:26
FEDERAL ENERGY
REGULATORY COMMISSION



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**RESOLUTION #243-14
OPPOSE THE PROPOSED ET ROVER PIPELINE**

At a special meeting of the Township Board of the Charter Township of Brandon, County of Oakland, State of Michigan, held on August 11, 2014, at 7:00 p.m.

**PRESENT: Allen, Darnall, DeWitt, Lapp, Rumball, Thurman
ABSENT: DePalma - with notice**

The following preamble and resolution were offered by Thurman and supported by Lapp.

WHEREAS, less than two years ago Energy Transfer (the parent company to ET Rover) claimed there was no need for the existing amount of natural gas capacity in Michigan (Docket No. CP12-491-000) and sold its north/south transmission line to Enbridge Energy so that it could be used to transport petroleum;

WHEREAS, the proposed route of the ET Rover pipeline does not supply natural gas to Michigan beyond the MichCon delivery point in Livingston County contrary to what is depicted on the map provided by ET Rover and is merely a "pass through" to another country which does not necessitate serving the common good of Michigan residents beyond Livingston County;

NOW, THEREFORE, BE IT RESOLVED, Brandon Township Board of Trustees oppose the proposed construction of the ET Rover natural gas pipeline due to lack of necessity and lack of serving the common good of Michigan residents beyond Livingston County.


BE IT FURTHER RESOLVED, that a copy of this Resolution shall be filed as a comment before the Federal Energy Regulatory Commission and sent directly to U.S. Senator Debbie Stabenow, U.S. Senator Carl Levin, U.S. Representative Mike Rogers, Governor Rick Snyder, Senator Dave Robertson, Representative Brad Jacobson, Oakland County Executive L. Brooks Paterson, Oakland County Commissioner Mike Spisz, and other Oakland County Townships along the proposed pipeline route.

Roll Call Vote: **AYES: Lapp, Rumball, Allen, Darnall, DeWitt, Thurman**
 NAYS: None
 ABSENT: DePalma – with notice

RESOLUTION APPROVED and ADOPTED.

STATE OF MICHIGAN)
)ss.
COUNTY OF OAKLAND)

I, the undersigned, duly qualified Township Clerk of the Charter Township of Brandon, Oakland County, Michigan, do hereby certify the foregoing is a true and complete copy of the proceedings taken by the Township Board of the Charter Township of Brandon at a meeting held on August 11, 2014.



Candee Allen, Clerk
Charter Township of Brandon

Dated August 14, 2014



Charter Township of Brandon

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Candee Allen, Clerk
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Jayson Rumball, Trustee

RESOLUTION #244-14 REROUTE THE PROPOSED ET ROVER PIPELINE

At a special meeting of the Township Board of the Charter Township of Brandon, County of Oakland, State of Michigan, held on August 11, 2014, at 7:00 p.m.

PRESENT: Allen, Darnall, DeWitt, Lapp, Rumball, Thurman

ABSENT: DePalma – with notice

The following preamble and resolution were offered by Thurman and supported by Allen.

WHEREAS, Pipeline 6B was constructed in Brandon Township in 1968 when Brandon Township was known for its multiple dairy farms and according to the 1970 census had a population of 4,813 and Brandon Township is now primarily residential with a population of 15,175 according to the 2010 census;

WHEREAS, Brandon Township has heavily wooded areas, and as such, has a Woodlands Ordinance (Exhibit 1) which was enacted to preserve and protect our woodlands and surrounding ecosystems. The construction of the proposed pipeline would not only be devastating to the dense environmental aesthetics of our woodlands but also their surrounding high priority ecosystems;

WHEREAS, Brandon Township contains the headwaters to the Flint River and Clinton River watersheds (Exhibit 2) and construction of the proposed pipeline would pose a threat to our very sensitive wetland ecosystems;

WHEREAS, Based on the environmental and safety consequences (Exhibit 3) of a potential rupture of a proposed 42" diameter pipeline at a minimum psi of 1100 the Potential Impact Radius would be 961 feet and would potentially be a safety hazard to the many residents living along the proposed pipeline route;

WHEREAS, experts believe placing a natural gas pipeline in close proximity to an existing petroleum pipeline could be disastrous;

WHEREAS, according to the proposed ET Rover high pressure natural gas pipeline map (Exhibit 4), the proposed route crosses the existing Enbridge Line 6B crude oil pipeline twice and comes within 480 feet (half the Potential Impact Radius) of the Enbridge Line 6B petroleum pipeline approximately one third of its distance through Brandon Township. If this current proposed pipeline were implemented it would create an even greater potential hazard should an explosion occur which would be catastrophic to the environment, have a devastating impact on the Flint River and Clinton River watersheds, disrupt our sensitive ecosystems and compromise the health, safety and even lives of the many residents living along the proposed pipeline route that we have been elected to protect;

WHEREAS, should this additional pipeline be constructed, property values of the homes in its vicinity would plummet;

WHEREAS, significant pipeline construction and repairs occurred in Brandon Township in 2011 when Enbridge remediated Line 6B after its rupture, and again in 2013 and 2014, when Enbridge replaced Line 6B in its entirety, and, therefore, the residents of Brandon Township have already made significant sacrifices for the public interest;

WHEREAS, ET Rover has stated in its Pre Filing, as an affirmative statement, that it would follow the existing Enbridge Line 6B corridor for its proposed route which *does not* use the existing easement but in fact requires an additional 50' easement and 100' of temporary workspace. Given the change in the characteristics of Brandon Township since the Line 6B route was first constructed in 1968 and the significant sacrifices already made by Brandon Township residents, it is not reasonable or just for Brandon Township to be established as a pipeline corridor;

WHEREAS, less than two years ago Energy Transfer (the parent company to ET Rover) claimed there was no need for the existing amount of natural gas capacity in Michigan (Docket No. CP12-491-000), received approval for abandonment on November 7, 2013 (just seven months prior to applying for the new ET Rover natural gas trunk line) and sold its north/south transmission line to Enbridge Energy so that it could be used to transport petroleum;

NOW, THEREFORE, BE IT RESOLVED, Brandon Township Board of Trustees oppose routing the proposed ET Rover pipeline through Brandon Township and suggest it be moved to less populated areas to the north along the I-69 corridor or purchase back its transmission line from Enbridge Energy in order to convert it back to natural gas.

BE IT FURTHER RESOLVED, that a copy of this Resolution shall be filed as a comment before the Federal Energy Regulatory Commission and sent directly to U.S. Senator Debbie Stabenow, U.S. Senator Carl Levin, U.S. Representative Mike Rogers, Governor Rick Snyder, Senator Dave Robertson, Representative Brad Jacobson, Oakland County Executive L. Brooks Paterson, Oakland County Commissioner Mike Spisz, and other Oakland County Townships along the proposed pipeline route.

Roll Call Vote: **AYES: Rumball, Allen, Darnall, DeWitt, Lapp, Thurman**

NAYS: None

ABSENT: DePalma – with notice

RESOLUTION APPROVED and ADOPTED.

STATE OF MICHIGAN)
)ss.
COUNTY OF OAKLAND)

I, the undersigned, duly qualified Township Clerk of the Charter Township of Brandon, Oakland County, Michigan, do hereby certify the foregoing is a true and complete copy of the proceedings taken by the Township Board of the Charter Township of Brandon at a meeting held on August 11, 2014.



Candee Allen, Clerk
Charter Township of Brandon

Dated: August 14, 2014

Exhibit 1

Sec. 46-391. Woodlands preservation.

- (a) This section is enacted in recognition of the fact that flora and fauna are necessary to the ecological system within which we all live, and that, as a result, the protection of flora and fauna, and their maintenance or replacement are necessary to the health, safety and welfare of the citizens of township, and further that such flora and fauna are natural resources, the protection of which is likewise necessary to the health, safety and welfare of the citizens of township, this section is enacted.
- (b) The following words, terms and phrases, when used in this section, shall have the meanings ascribed to them in this subsection, except where the context clearly indicates a different meaning:

Develop or development means any timbering operation, tree removal or the removal of flora from any undeveloped parcel, other than as permitted by the exceptions contained in this section. Topographical change on any undeveloped parcel, earth moving on any undeveloped parcel, or like activity of any kind with regard to any undeveloped parcel, shall also be considered to be development.

Flora means the trees and plant life characteristic to the township.

Survey or woodlands survey means a review of the extent and nature of the flora on a parcel in the township, with recommendations concerning the maintenance, removal or replacement of such flora, as performed by a landscape architect registered by the state.

Tree means a woody perennial plant having a single elongated main stem generally with few or no branches on its lower part and over six feet tall, measured from the ground immediately adjacent the trunk or main stem.

Undeveloped means any parcel of land which is substantially unimproved. With respect to land which, on the effective date of the ordinance from which this section is derived, is partially improved by virtue of a building or buildings or other improvements located on a portion of the land, the portion of the land which does not contain the building or buildings or other improvements shall be considered undeveloped. Farmland, whether or not it is being currently farmed, shall be considered undeveloped.

Woodlands means any tree or stand of trees of any nature whatsoever and the flora naturally attendant to such tree or stand of trees.

- (c) No person of any nature whatsoever shall develop any parcel in township without first providing a survey of the woodlands located on such parcel pursuant to this section.
- (d) When any person of any nature whatsoever makes application for subdivision plat approval, site condominium approval, multiple housing approval (whether for apartments or condominiums), commercial development, or any other development, such application shall include an application to the township, for a woodlands survey. Such application shall contain an aerial photograph, a topographical map, a boundary survey, and one inch equals 200 feet scale, together with such other information as may be required by the director of planning and building, and the applicant shall escrow an amount estimated by such director to be the fee that will be charged by the township landscape architect for the compilation of such survey, as well as for the balance of the work on the project.

- (e) Upon receiving the application, the director shall forthwith forward such application to the township's designated landscape architect, together with such support material as the director has received, and together with a request directed to such landscape architect to conduct such survey. The director shall be excused from making such request of the landscape architect until all materials requested by the director has been provided by the developer. The landscape architect shall complete such survey which shall contain the landscape architect's recommendations, within 30 days of such request.
- (f) In developments involving four or less single-family homesites, or involving less than 11 acres, whichever is the smaller, or in developments in which there are less than 20 trees within the boundaries of the development, the developer may, at the developer's option, prepare a survey of the woodlands at developer's expense and submit the same to the director of planning and building. Such survey shall be in a form satisfactory to the director. Upon receipt, the director of planning and building may, at the director's option, review the survey and view the parcel in question and make a determination concerning whether or not a more comprehensive survey should be required. The director may, in the director's discretion, accept the developer's survey in such instances, and permit the development to proceed. The director shall, however, have the absolute discretion to determine that additional survey information is needed, and the director may, in that instance, require that *participation of the township landscape architect in the same manner as required in subsections (d) and (e) of this section.*
- (g) In conducting the survey of the woodlands, the landscape architect shall determine whether or not there are any unique trees, unique stands of trees, specimen trees or unique woodland characteristics. The landscape architect shall determine how the project can best proceed in accordance with the development plans of the developer, while at the same time preserving to the maximum possible extent the existing woodlands, and other flora. The landscape architect shall then recommend a program of development to the township, which program shall be designed so as to permit the developer to develop the project in accordance with the developer's plans, so long as such plan is reasonable, and so long as a reasonable preservation of the flora can be obtained. In making such recommendation, the landscape architect may recommend the new plantings or the creation of additional sites of enhanced or improved flora be used to replace flora that will be removed through the course of the development. In the case of mitigation, the landscape architect shall recommend the type, location and manner of planting and maintenance of the replacement.
- (1) It is not intended that the survey required by this section be a tree count. Rather, it is intended that the survey be of a more general nature, intended to maintain, and where possible improve the ecological balance.
 - (2) *It is not intended that emphasis be placed on the preservation of mature trees. Rather, it is recognized that the evolutionary characteristics of the environment require that mature trees eventually be replaced by new growth. Accordingly, in the landscape architect's recommendations, mature trees shall be treated on balance with the rest of the eco-system and the landscape architect may recommend the harvesting of such trees and their replacement.*
 - (3) In those instances where it is determined by the landscape architect that the application is for tree harvesting, and that the harvesting is in keeping with good forestry management practice, the harvesting shall be permitted with or without mitigation as recommended by the landscape architect and determined by the planning commission. Later applications for the development of such parcel may be denied contingent upon tree replacement.
 - (4)

- In providing for mitigation, the landscape architect may recommend the replacement of mature trees with new plantings or young trees. He also may recommend more or less than a one for one mitigation ratio, depending on the particular facts. He may also recommend off-site mitigation with the approval of the developer. Any such recommendation must be explained and justified in the report.
- (5) In conducting the survey, the landscape architect shall apply the following general standards; such standards shall be general in nature and the application of the standards shall not require counting or measuring trees:
- a. Desirable species: Hard Maple, Red Maple, Soft Maple, Elm, Oak species, Hickory, Sycamore, Walnut, Butternut, Beech, Birch, Basswood, Chestnut, Tulip, Pine, Hemlock, Cedar, Balsam, Spruce.
 - b. Undesirable species: Boxelder, Poplar, Catalpa, Willow, Domestic Fruit Trees, Ailanthus, Black Locust, Wild Cherry.
 - c. Desirable species in good condition save if possible, or require mitigation.
 - d. Undesirable species or desirable species in only fair condition require partial mitigation.
 - e. Desirable or undesirable species that are in poor condition or dead remove under any condition.
- (h) When the survey has been completed, the landscape architect shall forward it to the director, and the director shall in turn forward the survey to the developer, and to the planning commission. The planning commission shall, at its next meeting, review the landscape architect's recommendations, and determine whether or not to accept or reject such recommendations. The developer may, in the developer's sole discretion, be present at such meeting. A public hearing shall not be necessary but may be called by the planning commission upon majority vote. If it is determined to hold a public hearing, it shall be held at the next available planning commission meeting. The planning commission may either adopt the survey or return the survey to the landscape architect for additional input, modification or comment. In the event of such referral, the landscape architect shall return the survey to the commission with such additions within 15 days of the date of referral.
- (i) Once the planning commission has adopted a survey, the survey shall become a requirement of the development subject to the right of the developer to object. If a developer determines to object to the survey the developer shall have 30 days, which 30 days may be extended at the request of the developer only, within which to submit the basis for objection to the planning commission. The planning commission shall not consider opinions or objections that are not supported by substantial material and competent evidence as supplied by landscape architects, engineers, or like professionals within the field of environmental development, maintenance and control.
- (j) Should the planning commission determine to adopt recommendations as made by the developer, the planning commission shall then forward such recommendations to the township landscape architect for adoption and inclusion in the survey as developed by the township landscape architect. The township landscape architect shall then rewrite the survey including the changes as adopted as a result of the developer's objections, and including such additional comments or recommendations as the landscape architect may have, and return the survey to the planning commission. The township landscape architect shall complete such additions, modifications, and the like, within 30 days of the submission to him of the changes by the planning commission. The amended survey when received by the planning commission shall then be the woodlands survey which shall be applicable to the parcel. The cost of such amendments shall be paid by the developer.

- (k) Prior to the development of the parcel, the planning commission shall determine what, if any, escrow or letter of credit shall be deposited with the township to assure compliance with the forestry plan. Development shall not begin until any such requirement has been complied with.
- (l) The following are exempt from the application of this section:
- (1) Single-family residences, or lots which are intended to house one single residence only, except when part of a larger development.
 - (2) Commercial nurseries or tree farms when such commercial nurseries or tree farms have been properly licensed by the state.
 - (3) Responses to flooding, fire or like emergency.
 - (4) The normal tree trimming, removal, and the like, when performed by governmental agencies and public utilities.
 - (5) The removal of dead or damaged trees or normal cleaning and pruning activity within a wooded area when such activity does not include the removal of healthy trees other than year old saplings or the like.
 - (6) Tree management programs, and like programs, including park development, on lands owned by the state, or one of its agencies.
 - (7) Farming, when such farming is the normal pursuit of agricultural endeavors as typically carried on in township.
 - (8) Classified wetlands that are to be left undisturbed.

(Ord. of 3-17-2008, § 11.06)

State law reference— Municipal forests. MCL 324.52701 et seq.

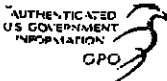


Exhibit 3

§ 192.807

that ensures the safe operation of pipeline facilities; and

(1) After December 18, 2004, notify the Administrator or a state agency participating under 49 U.S.C. Chapter 601 if the operator significantly modifies the program after the Administrator or state agency has verified that it complies with this section.

[Amdt. 192-86, 64 FR 46865, Aug. 27, 1999, as amended by Amdt. 192-100, 70 FR 10335, Mar. 3, 2005]

§ 192.807 Recordkeeping.

Each operator shall maintain records that demonstrate compliance with this subpart.

(a) Qualification records shall include:

(1) Identification of qualified individual(s);

(2) Identification of the covered tasks the individual is qualified to perform;

(3) Date(s) of current qualification; and

(4) Qualification method(s).

(b) Records supporting an individual's current qualification shall be maintained while the individual is performing the covered task. Records of prior qualification and records of individuals no longer performing covered tasks shall be retained for a period of five years.

§ 192.809 General.

(a) Operators must have a written qualification program by April 27, 2001. The program must be available for review by the Administrator or by a state agency participating under 49 U.S.C. Chapter 601 if the program is under the authority of that state agency.

(b) Operators must complete the qualification of individuals performing covered tasks by October 28, 2002.

(c) Work performance history review may be used as a sole evaluation method for individuals who were performing a covered task prior to October 28, 1999.

(d) After October 28, 2002, work performance history may not be used as a sole evaluation method.

(e) After December 18, 2004, observation of on-the-job performance may not

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be used as the sole method of evaluation.

[Amdt. 192-86, 64 FR 46865, Aug. 27, 1999, as amended by Amdt. 192-90, 66 FR 43524, Aug. 20, 2001; Amdt. 192-100, 70 FR 10335, Mar. 3, 2005]

Subpart O—Gas Transmission Pipeline Integrity Management

SOURCE: 68 FR 69817, Dec. 15, 2003, unless otherwise noted.

§ 192.901 What do the regulations in this subpart cover?

This subpart prescribes minimum requirements for an integrity management program on any gas transmission pipeline covered under this part. For gas transmission pipelines constructed of plastic, only the requirements in §§ 192.917, 192.921, 192.935 and 192.937 apply.

§ 192.903 What definitions apply to this subpart?

The following definitions apply to this subpart:

Assessment is the use of testing techniques as allowed in this subpart to ascertain the condition of a covered pipeline segment.

Confirmatory direct assessment is an integrity assessment method using more focused application of the principles and techniques of direct assessment to identify internal and external corrosion in a covered transmission pipeline segment.

Covered segment or covered pipeline segment means a segment of gas transmission pipeline located in a high consequence area. The terms gas and transmission line are defined in § 192.3.

Direct assessment is an integrity assessment method that utilizes a process to evaluate certain threats (*i.e.*, external corrosion, internal corrosion and stress corrosion cracking) to a covered pipeline segment's integrity. The process includes the gathering and integration of risk factor data, indirect examination or analysis to identify areas of suspected corrosion, direct examination of the pipeline in these areas, and post assessment evaluation.

Pipeline and Hazardous Materials Safety Admin., DOT

§ 192.903

High consequence area means an area established by one of the methods described in paragraphs (1) or (2) as follows:

- (1) An area defined as—
 - (i) A Class 3 location under §192.5; or
 - (ii) A Class 4 location under §192.5; or
 - (iii) Any area in a Class 1 or Class 2 location where the potential impact radius is greater than 660 feet (200 meters), and the area within a potential impact circle contains 20 or more buildings intended for human occupancy; or
 - (iv) Any area in a Class 1 or Class 2 location where the potential impact circle contains an identified site.
- (2) The area within a potential impact circle containing—
 - (1) 20 or more buildings intended for human occupancy, unless the exception in paragraph (4) applies; or
 - (i) An identified site.
 - (3) Where a potential impact circle is calculated under either method (1) or (2) to establish a high consequence area, the length of the high consequence area extends axially along the length of the pipeline from the outermost edge of the first potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy to the outermost edge of the last contiguous potential impact circle that contains either an identified site or 20 or more buildings intended for human occupancy. (See figure E.I.A. in appendix E.)
 - (4) If in identifying a high consequence area under paragraph (1)(iii) of this definition or paragraph (2)(1) of this definition, the radius of the potential impact circle is greater than 660 feet (200 meters), the operator may identify a high consequence area based on a prorated number of buildings intended for human occupancy with a distance of 660 feet (200 meters) from the centerline of the pipeline until December 17, 2006. If an operator chooses this approach, the operator must prorate the number of buildings intended for human occupancy based on the ratio of an area with a radius of 660 feet (200 meters) to the area of the potential impact circle (i.e., the prorated number of buildings intended for human occupancy is equal to $20 \times (660$

feet) [or 200 meters]/potential impact radius in feet [or meters]²).

Identified site means each of the following areas:

- (a) An outside area or open structure that is occupied by twenty (20) or more persons on at least 50 days in any twelve (12)-month period. (The days need not be consecutive.) Examples include but are not limited to, beaches, playgrounds, recreational facilities, camping grounds, outdoor theaters, stadiums, recreational areas near a body of water, or areas outside a rural building such as a religious facility; or
 - (b) A building that is occupied by twenty (20) or more persons on at least five (5) days a week for ten (10) weeks in any twelve (12)-month period. (The days and weeks need not be consecutive.) Examples include, but are not limited to, religious facilities, office buildings, community centers, general stores, 4-H facilities, or roller skating rinks; or
 - (c) A facility occupied by persons who are confined, are of impaired mobility, or would be difficult to evacuate. Examples include but are not limited to hospitals, prisons, schools, day-care facilities, retirement facilities or assisted-living facilities.
- Potential impact circle* is a circle of radius equal to the potential impact radius (PIR).

Potential impact radius (PIR) means the radius of a circle within which the potential failure of a pipeline could have significant impact on people or property. PIR is determined by the formula $r = 0.69 \times (\text{square root of } (p \times d^3))$, where 'r' is the radius of a circular area in feet surrounding the point of failure, 'p' is the maximum allowable operating pressure (MAOP) in the pipeline segment in pounds per square inch and 'd' is the nominal diameter of the pipeline in inches.

NOTE: 0.69 is the factor for natural gas. This number will vary for other gases depending upon their heat of combustion. An operator transporting gas other than natural gas must use section 3.2 of ASME/ANSI B31.8S-2001 (Supplement to ASME B31.8: incorporated by reference, see §192.7) to calculate the impact radius formula.

Remediation is a repair or mitigation activity an operator takes on a covered segment to limit or reduce the probability of an undesired event occurring

§ 192.905

or the expected consequences from the event.

[88 FR 69817, Dec. 15, 2003, as amended by Amdt. 192-95, 69 FR 18231, Apr. 6, 2004; Amdt. 192-95, 69 FR 29904, May 26, 2004; Amdt. 192-103, 72 FR 4657, Feb. 1, 2007]

§ 192.905 How does an operator identify a high consequence area?

(a) *General.* To determine which segments of an operator's transmission pipeline system are covered by this subpart, an operator must identify the high consequence areas. An operator must use method (1) or (2) from the definition in § 192.903 to identify a high consequence area. An operator may apply one method to its entire pipeline system, or an operator may apply one method to individual portions of the pipeline system. An operator must describe in its integrity management program which method it is applying to each portion of the operator's pipeline system. The description must include the potential impact radius when utilized to establish a high consequence area. (See appendix E.I. for guidance on identifying high consequence areas.)

(b)(1) *Identified sites.* An operator must identify an identified site, for purposes of this subpart, from information the operator has obtained from routine operation and maintenance activities and from public officials with safety or emergency response or planning responsibilities who indicate to the operator that they know of locations that meet the identified site criteria. These public officials could include officials on a local emergency planning commission or relevant Native American tribal officials.

(2) If a public official with safety or emergency response or planning responsibilities informs an operator that it does not have the information to identify an identified site, the operator must use one of the following sources, as appropriate, to identify these sites.

- (i) Visible marking (e.g., a sign); or
- (ii) The site is licensed or registered by a Federal, State, or local government agency; or
- (iii) The site is on a list (including a list on an internet web site) or map maintained by or available from a Federal, State, or local government agency and available to the general public.

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(c) *Newly identified areas.* When an operator has information that the area around a pipeline segment not previously identified as a high consequence area could satisfy any of the definitions in § 192.903, the operator must complete the evaluation using method (1) or (2). If the segment is determined to meet the definition as a high consequence area, it must be incorporated into the operator's baseline assessment plan as a high consequence area within one year from the date the area is identified.

§ 192.907 What must an operator do to implement this subpart?

(a) *General.* No later than December 17, 2004, an operator of a covered pipeline segment must develop and follow a written integrity management program that contains all the elements described in § 192.911 and that addresses the risks on each covered transmission pipeline segment. The initial integrity management program must consist, at a minimum, of a framework that describes the process for implementing each program element, how relevant decisions will be made and by whom, a time line for completing the work to implement the program element, and how information gained from experience will be continuously incorporated into the program. The framework will evolve into a more detailed and comprehensive program. An operator must make continual improvements to the program.

(b) *Implementation Standards.* In carrying out this subpart, an operator must follow the requirements of this subpart and of ASME/ANSI B31.8S (incorporated by reference, see § 192.7) and its appendices, where specified. An operator may follow an equivalent standard or practice only when the operator demonstrates the alternative standard or practice provides an equivalent level of safety to the public and property. In the event of a conflict between this subpart and ASME/ANSI B31.8S, the requirements in this subpart control.

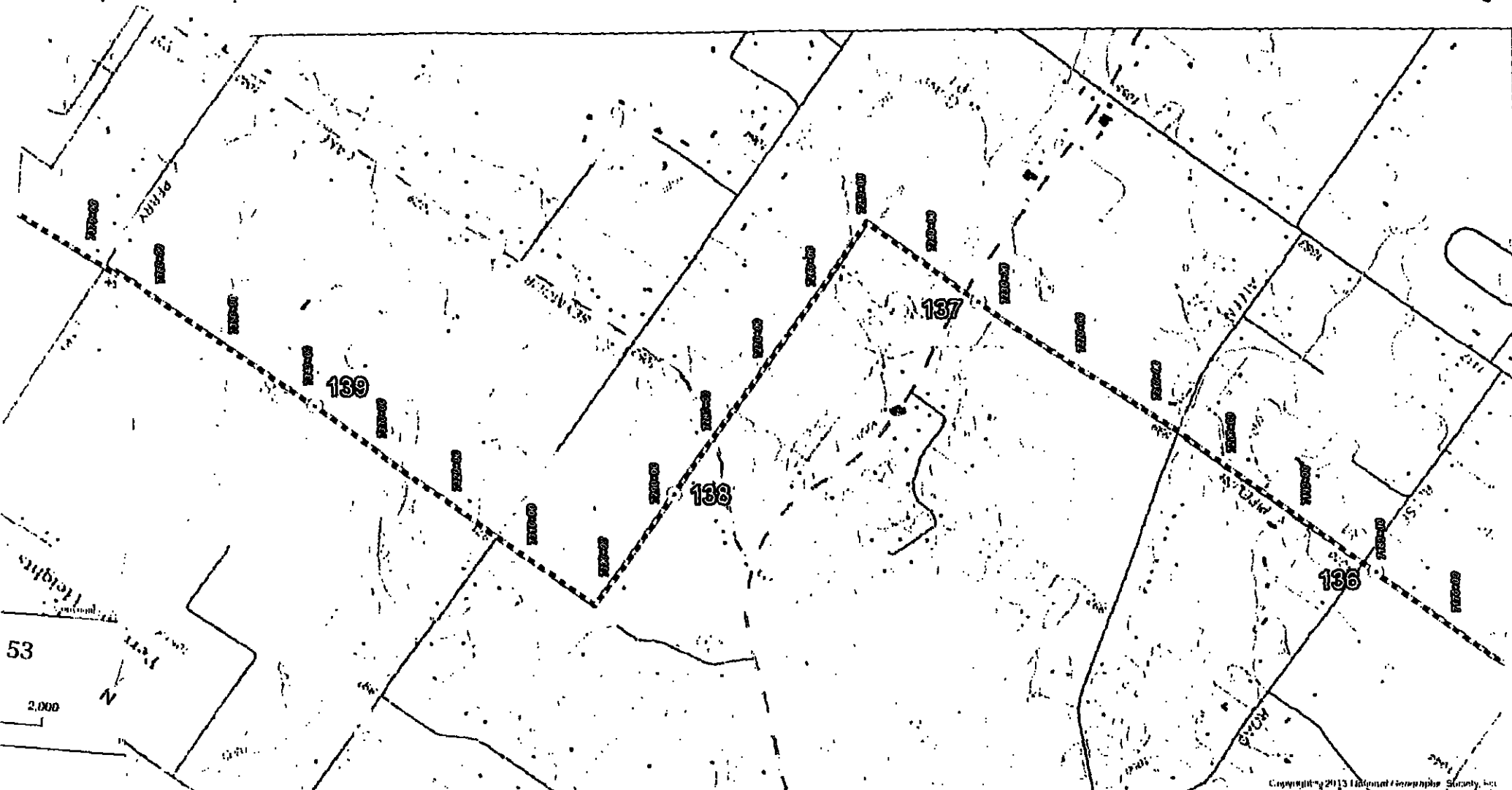
§ 192.909 How can an operator change its integrity management program?

(a) *General.* An operator must document any change to its program and

Pipe line diameter (inches)

42

Operating pressure (PSI)	Potential Impact Radius (ft)
1000	916.43
1100	961.16
1200	1003.90
1300	1044.89
1400	1084.33
1500	1122.39
1600	1159.20
1700	1194.88
1800	1229.52
1900	1263.21
2000	1296.02
2100	1328.03
2200	1359.28
2300	1389.83
2400	1419.72
2500	1449.00
2600	1477.70
2700	1505.84
2800	1533.48
2900	1560.62
3000	1587.30
3100	1613.54
3200	1639.36
3300	1664.77
3400	1689.81
3500	1714.48



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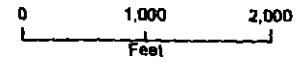
- Midwest Hub to International Border
- Midpoint
- Railroad
- River
- 100m Wetland
- Park
- National Park Service



ROVER PIPELINE PROJECT
MIDWEST HUB TO INTERNATIONAL BORDER

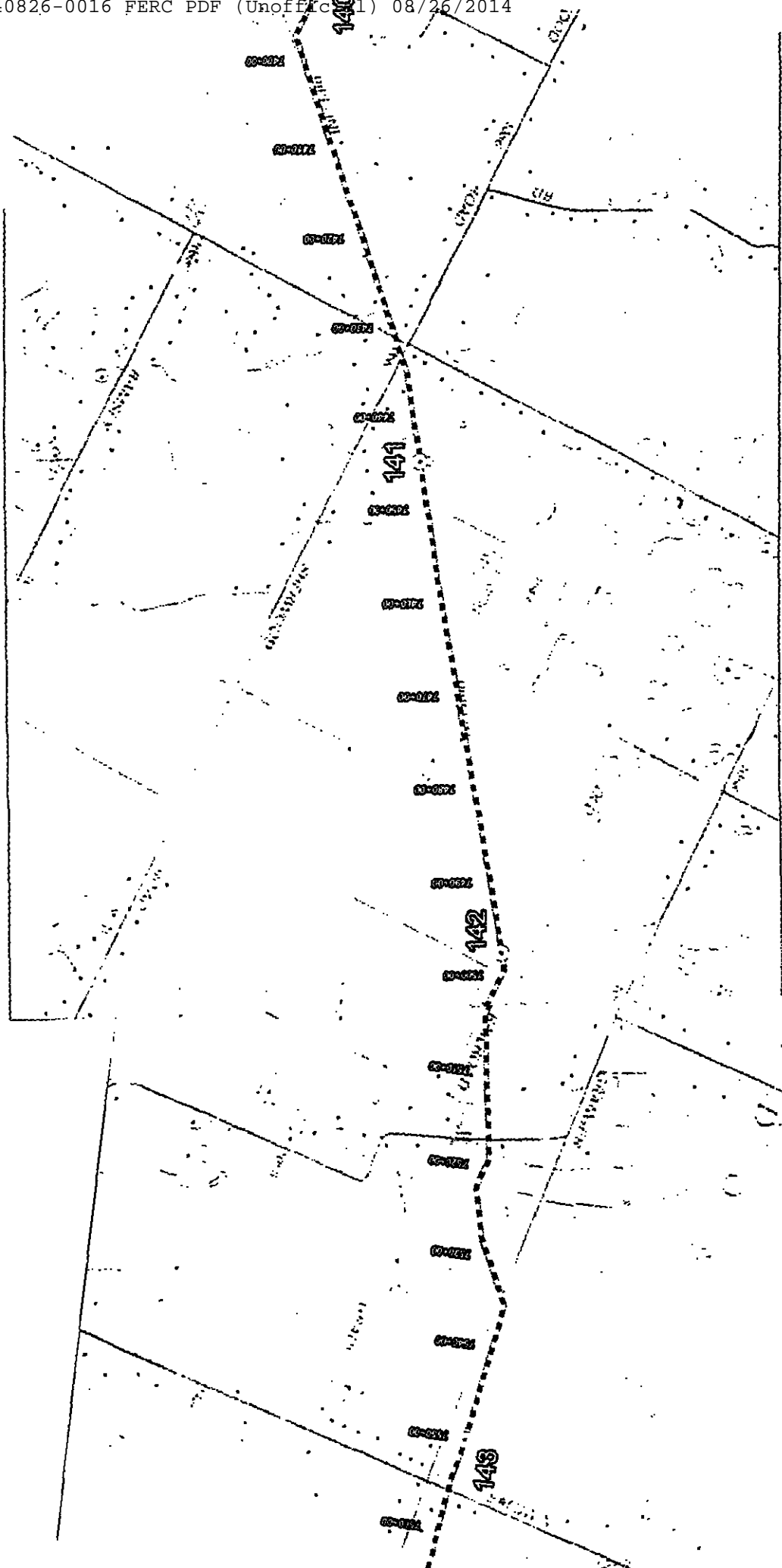
SHEET 52

07/24/2014 NAD83 UTM 17N FT MAP SIZE 11X17



PROJECT CONSULTING SERVICE

Exhibit 4



ROVER PIPELINE PROJECT
MIDWEST HUB TO INTERNATIONAL BORDER

07/24/2014 NSG083.UTM 17N FT MAP SIZE 11X17

ENERGY TRANSFER

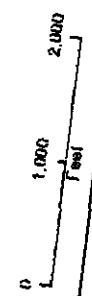
International Past Service

- Midwest Hub to International Border
- Survey Point
- National
- State
- Local
- Other
- Road
- Other

UTM Zone: 17N
 UTM Easting: 6113
 UTM Northing: 6113

ELINE PROJECT
INTERNATIONAL BORDER

SHEET 54



11X17 MAP SIZE 11X17

Part 2 of 3