



February 3, 2017

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

Re: Request for Immediate Action

OEP/DG2E/Gas Branch 4
Rover Pipeline LLC (Rover Pipeline Project)
Panhandle Eastern Pipe Line Company, LP (Panhandle Backhaul Project)
Trunkline Gas Company, LLC (Trunkline Backhaul Project)
FERC Docket Nos. CP15-93-000, CP15-93-001, CP15-94-000, and CP15-96-000
Implementation Plan and Request for Notice to Proceed with Preconstruction/Construction Activities

Dear Ms. Bose:

On February 2, 2017, the Federal Energy Regulatory Commission ("FERC" or "Commission") issued its Order Issuing Certificate ("Order") for the Rover Pipeline, Panhandle Backhaul, and Trunkline Backhaul Projects under Docket Nos. CP15-93-000, CP15-93-001, CP15-94-000, and CP15-96-000, respectively (collectively "Applicants").

In accordance with Ordering Paragraph F and Environmental Condition No. 6 of Appendix B thereto, the Applicants hereby submit their Implementation Plan and request herein that the Director of Office of Energy Projects review and issue written approval.

Rover Pipeline Project

As stated in Rover's Request for Immediate Action filed on December 16, 2016, Rover has committed to, the FERC has contemplated in the NEPA documents, and the U.S. Fish & Wildlife Service ("USFWS") has concurred with the proposal and plan to reduce impacts on federally listed Indiana and northern long-eared bats to clear trees within the USFWS approved seasonal windows between October 1 and March 31 in Michigan, Ohio, and Pennsylvania, and between November 15 and March 31 in West Virginia. Implementation of this clearing conservation measure will require felling of trees from approximately 2,918 acres of land along 511.4 miles of the Project and from 112 acres within the aboveground facilities. All trees will be dropped within the authorized construction right-of-way and facility limits of disturbance within the specified windows for later disposal during clearing and grading. To accomplish this, multiple crews and equipment must be mobilized along the entire Project construction right-of-way and facility limits of disturbance during the USFWS-window immediately.

Therefore, Rover is requesting the *critical and immediate* issuance of a Notice to Proceed with preconstruction felling of trees, including the area within wetlands via non-mechanical methods, and installing the necessary access roads within the Rover Pipeline Project limits of disturbance as previously requested in Rover's application and supplemental filings immediately. Rover has obtained all the Federal permits required to begin these activities. There are no state or local permits required to fell trees.

In addition to the immediate release to begin tree felling, Rover also requests the full release to begin all construction activities of all certificated facilities and related workspaces and contractor yards as contemplated in the certificate proceedings or as described herein no later than February 20, 2017 to allow Rover to begin construction activities that will lead to Rover's ability to provide transportation service to its shippers and the broader natural gas market within the Utica and Marcellus production region.

Rover states that it has obtained all applicable Federal permits related to the certificated facilities, and those described herein, except for the U.S. Army Corps of Engineers Section 404 (Clean Water Act [CWA]) permit and the Ohio Environmental Protection Agency and West Virginia Department of Environmental Protection Section 401(CWA) permits. Rover will provide evidence of those permits to FERC once received in a supplemental request to initiate ground disturbance and construction within these wetland features.

Rover has scheduled an environmental training session on February 7, 2017 for employees and contractors scheduled to begin work to fell trees and install the necessary access roads, which FERC is invited to attend. Rover requests a Notice to Proceed from FERC on the initial items above prior to that date, as well as a decision on FERC's preferred contractor for the Third Party Contractor for the Project. Rover will conduct follow-up trainings on February 21 and March 7, 2017 for the remaining contractors and the construction staff that will work on the proposed Project.

Panhandle and Trunkline Backhaul Projects

Panhandle Eastern Pipe Line Company and Trunkline Gas Company request the immediate issuance of a Notice to Proceed for construction at all locations as requested in the application and supplemental filings.

This filing is being submitted electronically to the Commission's eFiling website pursuant to the Commission's Order No. 703, Filing via the Internet Guidelines issued on November 15, 2007 in FERC Docket No. RM07-16-000. A copy of this filing will be provided to FERC staff at their directions. Any questions or comments regarding this filing should be directed to the undersigned at (713) 989-2606.

Respectfully submitted,

/s/ Stephen T. Veatch

Stephen T. Veatch
Senior Director, Certificates

cc: Rich McGuire – FERC Office of Energy Projects
Jim Martin – FERC Office of Energy Projects
Kevin Bowman - FERC Office of Energy Projects

CERTIFICATE OF SERVICE

In accordance with the requirements of Section 385.2010 of the Commission's Rules of Practice and Procedures, I hereby certify that I have this day caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding.

/s/ Kelly Allen

Mr. Kelly Allen, Manager
Regulatory Affairs Department
Rover Pipeline LLC
(713) 989-2606