



February 8, 2017

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

Re: Request for Immediate Action

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, CP15-94-000, and CP15-96-000  
Supplement to Implementation Plan and Request for Notice to Proceed

Dear Ms. Bose:

On February 2, 2017, the Federal Energy Regulatory Commission ("FERC" or "Commission") issued an Order Issuing Certificate ("Order") for the Rover Pipeline, Panhandle Backhaul, and Trunkline Backhaul Projects (collectively "Applicants").

On February 3 and February 6, 2017, the Applicants submitted their Implementation Plan (as further supplemented on February 7, 2017) in accordance with Ordering Paragraph F and Environmental Condition No. 6 of Appendix B of the Order and requested that the Director of the Office of Energy Projects issue a Notice to Proceed without delay authorizing (i) the felling of trees, including the area within wetlands via non-mechanical methods, and (ii) the use of existing access roads within the Rover Pipeline Project limits of disturbance ("Notice to Proceed Request"). The Applicants hereby supplement the Notice to Proceed Request to provide the following additional information requested so that the Commission staff may conclude the Section 106 process for this proceeding.

1. *Rover's response to condition 5 includes a request for use of 28 contractor yards, and indicates the yards have been surveyed for cultural resources (p.7). Rover, however, has not provided the survey reports (table 5-10 indicates a submittal date to the SHPOs of 12/2/16 for Pennsylvania, 12/2/16 for West Virginia, 1/9/16 (sic) and 12/2/16 for Ohio, and 12/8/16 for Michigan). Please provide the survey reports.*

**Response:**

The requested survey reports are included as Enclosures 1a-1e. Also enclosed is a letter to the Ohio SHPO on February 1, 2017 (attached as Enclosure 1f), requesting explicit clearance for the Spread B Equipment Yard, which was surveyed, but unnamed in a previous survey report. Rover will provide the verification to FERC upon receipt.

2. *The Michigan Second Addendum survey report filed with the Implementation Plan indicates that 0.9 mile of the route in Michigan remains un-surveyed. A subsequent report was provided, but it is for a .75-mile-long reroute. Please clarify this and identify in which report the 0.9 mile is surveyed and*

*reported on. Provide the report and the SHPO's comments on the report, if not already submitted. Confirm that all surveys in Michigan are completed.*

**Response:**

The response to this question will be provided in a separate submittal response.

3. *Provide the 1/28/16 (sic) additional documentation to the Ohio SHPO, referenced in Note 4 of table 5-10.*

**Response:**

The requested January 28, 2017 letter to the Ohio SHPO is attached as Enclosure 3a. Additionally, attached as Enclosure 3b is a letter from the Dennison Railroad Depot Museum to Rover's pipeline construction contractor, noting that the museum has no issues with Rover's proposed use of the Spread 1 Main 1 Contractor Yard Options 4A and 4B. This letter was provided to the Ohio SHPO on February 7, 2017.

4. *Provide the December 28, 2016 "extension requests" (referenced in table 9-2) to the Michigan, Ohio, Indiana, and Illinois SHPOs for the Panhandle Backhaul project, and the December 27, 2016 "extension requests" (referenced in table 9-3) to the Illinois, Tennessee, and Mississippi SHPOs for the Trunkline Backhaul project.*

**Response:**

The extension request letters referenced are included as Enclosures 4a (Panhandle Backhaul) and 4b (Trunkline Backhaul).

5. *Confirm that Rover would avoid site 20LE387, and historic structures CAR-013, CA-043, and CA-045, in accordance with the recommendations contained in the survey reports or Michigan SHPO comments. Confirm that Rover would fence the work space at sites 20LE368 and 20LE381, as recommended by the Michigan SHPO.*

**Response:**

Rover confirms that it will avoid 20LE387 and historic structures CAR-013, CA-043, and CA-045 and will install exclusion fencing to separate the work space from sites 20LE368 and 20LE381, as recommended by the Michigan SHPO. Rover will also install exclusion fencing to avoid potential impacts to 20LE387.

6. *Rover did not address condition 40.a.ii (provide the Michigan SHPO's comments on the avoidance plan for 11 sites).*

**Response:**

Archaeological site avoidance plans for eleven archaeological sites (20LE338, 20LE355, 20LE193, 20LE368, 20LE381, 20LE387, 20WA452, 20WA461, 20WA466, 20GS147, and 20LP357) were submitted to the Michigan SHPO on March 3, 2016. The Michigan SHPO has not responded to the letter directly; however, recommendations from the Michigan SHPO for three of those sites (20LE368, 20LE381, and

Ms. Kimberly D. Bose  
February 8, 2017  
Page 3

20LE387, also addressed in question 5) are provided in two October 14, 2016 review letters attached as Enclosures 6a and 6b. Four of the sites (20WA452, 20WA466, 20GS147, and 20LP357) are well outside the project corridor and no further consideration of those sites was recommended for the Project. The remaining four sites (20LE338, 20LE355, 20LE193, and 20WA461) are outside the construction workspace. Rover proposed the use of exclusion fencing during construction to further protect them and is requesting specific concurrence for these proposed avoidance plans from the Michigan SHPO.

7. *Confirm that all cultural resource surveys for the project (with the exception of any areas that would be identified following submittal of the Implementation Plan) have been completed.*

**Response:**

Rover confirms that all areas for which Rover is requesting clearance in the Implementation Plan or in previous filings have been surveyed.

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. Any questions or comments regarding this filing should be directed to the undersigned at (713) 989-2024.

Respectfully submitted,

/s/ Stephen T. Veatch

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Stephen T. Veatch  
Senior Director, Certificates

cc: Ann Miles - FERC Office of Energy Projects  
Richard McGuire - FERC Office of Energy Projects  
Laurie Boros - FERC Office of Energy Projects  
Kevin Bowman - FERC Office of Energy Projects

Attachment

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

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