



February 9, 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
Second 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 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"). On February 8, 2017, the Applicants supplemented the Notice to Proceed Request by providing responses to seven questions so that the Commission staff may conclude the Section 106 process for this proceeding. Provided below are the response to Request Number 2, and supplemental information to complete the response to Request Number 6.

- 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 question of the 0.9-mile potentially unsurveyed portion of the route was determined to be an issue of a reroute that was further amended after submission of the Second Addendum report. Rover has reviewed the survey coverage for cultural resources throughout the state of Michigan to verify full coverage for the Project. All portions of the proposed Michigan Project route as submitted for approval to FERC have been surveyed for cultural resources and submitted to the Michigan State Historic Preservation Office (SHPO) in the reports listed below, for which concurrence has been subsequently received from the Michigan SHPO.

- Phase I Cultural Resources Survey of The Proposed Rover Pipeline Project in Monroe, Lenawee, Washtenaw, Livingston, Shiawassee, Genesee, Oakland, Lapeer, Macomb, and St. Clair Counties, Michigan, December 16, 2015
- Addendum to the Phase I Cultural Resources Survey of The Proposed Rover Pipeline Project in Lenawee, Washtenaw, and Livingston Counties, Michigan, March 17, 2016
- Second Addendum to the Phase I Cultural Resources Survey of the Proposed Rover Pipeline Project in Lenawee, Washtenaw, and Livingston Counties, Michigan, December 16, 2015
- Rover Pipeline, LLC Archaeological Site Avoidance Treatment Plans for Sites 20LE338, 20LE355, 20LE193, 20LE368, 20LE381, 20LE387, 20WA452, 290WA461, 20WA466, 20GS147, and 20LP357 in Lenawee, Washtenaw, Genesee, and Lapeer Counties, Michigan (Letter Report), March 8, 2016
- Rover Pipeline, LLC Above-Ground Site Avoidance Treatment Plans for CAR-005, CAR-013, CAR-015, CA-043, and CA-045 in Washtenaw County, Michigan (Letter Report), April 13, 2016
- ER 14-458 ET Rover Pipeline Project 2nd Addendum to Phase I Cultural Resource Survey, Additional Information for CA-045, 11150 Island Lake Road, Dexter Township, Washtenaw County (Letter Report), August 18, 2016
- Addendum to the Phase I Cultural Resources Survey Proposed Rover Pipeline Project Michigan Paving Study Area, Freedom Township, Washtenaw County, Michigan, September 15, 2016

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. Rover requested a specific response from the Michigan SHPO regarding these treatment plans on February 8, 2017, and received concurrence with all the proposed treatment plans via email also on February 8, 2017 (attached as Enclosure 6c). As previously disclosed, Rover has committed to installing exclusion fencing at the edge of the right-of-way to further protect seven of the sites as described in the site avoidance plans (20LE338, 20LE355, 20LE193, 20LE368, 20LE381, 20LE387, and 20WA461).

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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

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

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