



ROVER PIPELINE
An ENERGY TRANSFER Company

April 28, 2017

Mr. Craig W. Butler
Director, Ohio Environmental Protection Agency
50 W. Town Street, Suite 700
Columbus, Ohio 43215

Dear Mr. Butler,

Re: Rover Pipeline Project, Ohio EPA ID No. 154852

Thank you for meeting with Rover Pipeline LLC (“Rover”) yesterday in regards to inadvertent releases of bentonite clay/water slurry mix into two category 2 wetland areas in the State of Ohio as well as other matters related to the environmental performance of the pipeline project. We appreciate the candid feedback and direct guidance provided in the meeting. I want to personally thank you and to provide you Rover’s assurance that we take these matters very seriously, and have immediately employed steps to minimize any impacts to the environment and we will incorporate the additional measures we discussed.

Rover Pipeline only employs highly skilled construction contractors and professionals who are specifically trained in pipeline construction and operations. Additionally, the construction contractors for Rover are mostly Union employees who have undergone robust training programs and work and live in Ohio where the pipeline traverses. These Ohio residents and the entire Rover team understand the significance and the sensitivity of the releases to the environment, and are taking steps to mitigate the releases. As we navigate the remaining work, recover the released bentonite/water slurry mix and restore the areas that have been impacted, Rover has and will continue to incorporate the following activities into the inadvertent release plans that are on file with your office as well as with the Federal Energy Regulatory Commission.

These activities supplement the existing plans and include, but are not limited to:

- Ensure immediate notification to the Ohio Environmental Protection Agency (“OEPA”) and other applicable state and Federal agencies of any releases. This includes certain pre-notifications that can be predicted when drilling circulation or drilling returns are lost during the drilling process. As part of the notification, Rover will initiate a dialogue with the OEPA to identify alternate drilling techniques to isolate or identify inadvertent relief points such as evaluating the potential of adding relief holes to the drill profile.
- Rover will expand its evaluation radius to adjacent properties and areas to monitor via direct land access, aerial evaluation and drone technology to assist in the inadvertent release

identification. This will include adding staff to assist in the evaluations and assessments on the ground.

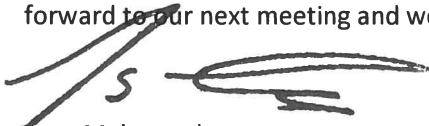
- As we discussed, releases of the bentonite/water slurry are not uncommon during horizontal directional drilling operations. Additionally, the risk of impacts to the environment from the bentonite and water slurry are much less than the direct impacts that would occur from alternate crossing methods. In this regard, Rover and its contractors anticipate having inadvertent releases and are proactively making preparations to pre-stage response equipment, materials and staff in the event an inadvertent releases occur. This staging includes adding additional redundant equipment and drill-specific evaluations.
- When drilling returns are lost, Rover and its contractors will continue to temporarily halt and/or slow down the drilling operation to the minimum turning rotation and pressure requirements to advance the drill in an attempt to either seal the release point in the subsurface drill hole or to possibly identify the location of the release so as to quickly contain and implement the inadvertent release plans and recovery efforts.
- Since mid-2014, Rover has provided a hotline for landowners and concerned stakeholders to call. This number is 888-844-3718. Rover has previously provided this number to all stakeholders via newspaper advertising, direct mailings, the project website roverpipelinefacts.com, our right-of-way agreements and communications, and numerous public meetings and open houses. Stakeholders can also provide comments via a hyper-link on the website. However, Rover understands the need to further reinforce and distribute this information to the various stakeholders. In that regard, Rover will republish its hotline number via general circulation media such as newspapers and will redistribute the number via personal and written communications to the landowners near the horizontal directional drills. Rover also will provide the hotline number and website to local community leaders for distribution. In addition to the hotline, each stakeholder located along the right-of-way has a direct phone number to the right-of-way agents supporting the construction in the field.
- Rover has identified all sensitive waterbodies and wetlands where a horizontal directional drill is proposed and will continue to reiterate the importance of these resources to its employees, inspectors, monitors and contractors. As part of this awareness, Rover will include additional inspections, hire and provide addition third party drilling monitors as well as trained staff to look for and identify inadvertent releases. We will also monitor drilling operations to insure the added vigilance is deployed to manage the timeliness and speed of the execution of the drill.
- In addition to drilling, Rover will continue to deploy the necessary resources to ensure compliance with the storm water requirements pursuant to the expectations of the Ohio EPA as well as to conform to the standards of the Federal Energy Regulatory Commission. This will include training staff on proper water filtration, trench dewatering, off-right-of-way tracking of mud, slope breakers and sedimentation containment techniques. One immediate technique that will be deployed for heavy silt-laden water or trench dewatering will be the deployment of sediment bag filtration that will be collocated within sediment basins or traps lined with silt capturing materials and surrounded by hay bales. Other techniques may also be utilized as necessary.

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- Rover will continue to review and deploy the techniques as provided in the Rain Water and Land Development Manual.
- In all instances, Rover will emphasize to all its contractors and employees to be aware of and take immediate and proactive steps to minimize off-right-of-way sedimentation, and to take the necessary steps to protect water resources (e.g. wetlands, streams, etc.) and to reinforce as necessary any existing sedimentation control techniques to improve off-right-of-way sedimentation.
- Rover will monitor the amount of open ditches and disturbed land as well as the duration of exposed soils and will deploy soil stabilization techniques as necessary to minimize the amount of sediment generated from the construction work locations.
- Rover also will increase efforts to stabilize temporary spoil piles during construction.

As we discussed in the meeting, Rover is very experienced in construction of pipelines and energy infrastructure and holds our environmental stewardship responsibilities and compliance obligations as core values within our organization. We appreciate the feedback and open dialogue and can assure you that the above steps will be deployed and emphasized to our employees, contractors, inspectors and monitors. Our staff will continue to work with the OEPA and other Federal and state agencies to minimize impacts to the environment as well as to mitigate any impacts that have occurred from the inadvertent releases.

If you have any questions or need additional information, please do not hesitate to contact me. I look forward to our next meeting and working with the OEPA.



Joey Mahmoud
EVP, Engineering and Construction