

Rover Pipeline LLC
Docket No. CP15-93-000

Response to FERC Environmental Information Request
Dated June 8, 2016

1. *During the public meeting held on April 7, 2016 at Fairless High School, the landowner for parcel OH-ST-045.00 stated their objection to the current location of mainline valve site MLV-05 on their parcel. Therefore, report on the current status of Rover's easement negotiations for all parcels where Project aboveground facilities (e.g., compressor and meter stations, mainline block valves, pigging facilities) are currently proposed. If Rover has been unable to obtain access to these parcels or negotiate an acceptable easement agreement for these aboveground facilities, please provide an analysis of alternative sites for each aboveground facility which includes any relevant environmental, engineering, or economic factors associated with use of the alternative site. The analysis should include a table which compares/contrasts the alternative sites' characteristics (environmental, engineering, economic) with the proposed aboveground facility site.*

Response:

The U.S. Department of Transportation (USDOT), Pipeline and Hazardous Materials Safety Administration (PHMSA) is the federal agency with authority for regulating oil and gas pipelines. The USDOT is exclusively authorized to promulgate safety and design standards for pipelines and transportation facilities under the Pipeline Safety Act, as amended (49 U.S. Code §§ 60101 et seq.). The USDOT Minimum Federal Safety Standards are set forth in Title 49 of the Code of Federal Regulations (CFR) Part 192 (Part 192). Part 192 specifies material selection and qualification, minimum design and construction requirements, protection from internal, external, and atmospheric corrosion, as well as operational requirements.

Part 192 defines four area classifications based on population density in the vicinity of the pipeline, with Class 1 accounting for the least populated areas and Class 4 accounting for the most populated areas. Class locations representing more populated areas require more stringent considerations in pipeline design, wall thickness, testing, and operation. Specifically relevant to this discussion, class locations also specify the following maximum distances to a sectionalizing mainline valve (MLV) from any given point on the pipeline: 10 miles in Class 1, 7.5 miles in Class 2, 4 miles in Class 3, and 2.5 miles in Class 4 (49 CFR § 192.179). Pipeline design pressures, wall thickness, hydrostatic test pressures, maximum allowable operating pressure (MAOP), inspection and testing of welds and frequency of pipeline patrols and leak surveys must also conform to higher standards in more populated areas.

To assess the appropriate class locations for the Project, Rover Pipeline LLC (Rover) reviewed aerial imagery, property tax records, and civil surveys to identify the location of residences and other buildings intended for human occupancy, and to determine the density of those buildings along the proposed route. In addition, Rover contacted all counties crossed by the Project to identify any proposed developments. If the population density, proposed developments, or a combination thereof neared the threshold limits for a class location as defined by 49 CFR § 192.5, Rover increased the class location to augment the safety factor of the pipeline and minimize the probability of future disturbance to landowners should an increase in pipe wall thickness be

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required if the proposed development or additional population density should occur. This is an example of a passive protection, which minimizes the hazards by incorporating process and equipment design features to reduce either the frequency or consequence of a hazard without the active functioning of a device. The inherent design of modern pipeline systems affords protection for all but the most severe natural hazard events or inadvertent human actions, such as excavation damage by backhoe.

Active (or engineering) controls use instruments, valves, safety interlocks, and emergency shutdown systems to detect and correct process deviations. Examples of active controls include:

- applicable overpressure protection systems to be installed at receipt/delivery interconnect points,
- gas chromatographs to be installed at receipt points to ensure gas quality specifications per producer precedent agreements,
- a Supervisory Control and Data Acquisition (SCADA) system to provide for and enable continuous pipeline monitoring and the control of the gas pipeline,
- Remote Terminal Units for the SCADA system to be located on every receipt/delivery interconnect manifold, at those points on the pipeline, and
- MLVs to be equipped with remote-controlled actuators that will allow for valve closure if a rapid loss of pressure is detected.

Rover has conducted an extensive siting analysis for the location of each aboveground facility proposed for the Rover Pipeline Project (Project). While adhering to the spacing requirements of Part 192, Rover has also assessed the suitability of each site by accounting for the availability of power, topography of the area, accessibility, distance from residences, and avoidance of biological and cultural resources, as well as other site-specific considerations.

Many of the active safety controls proposed for the Project, including those listed above, require electrical power to be present at the aboveground facilities. These features are integral to the design of the system and significantly increase the safety of the proposed pipeline. All proposed sites were evaluated to verify if electrical power was either readily available or could be obtained. The aboveground facilities, especially MLVs and meter stations, were placed along roadways to the extent possible. In many cases, this facilitates access to commercial power since electrical utilities tend to be collocated with roadways, and also provides all-weather access to the facilities in the case of an emergency. In addition, placing the facilities near a road is often preferred by landowners rather than having the facility in the interior of a cultivated field or pasture, for instance. Similarly, the distance from residences and the position of the facilities relative to residences were evaluated.

Rover has conducted extensive environmental and cultural surveys and has sited the aboveground facilities to avoid impacts to the greatest extent possible. Although wetlands were delineated within the tract boundaries of several facilities, in total, only 0.17 acre of palustrine emergent wetland will be permanently impacted (Defiance Compressor Station). The remaining wetlands

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will be avoided by construction and operation of the facilities. Similarly, although several streams have been delineated within the tract boundaries, none will be permanently impacted by the aboveground facilities. The aboveground facilities will not impact any potentially eligible cultural resources. Rover has expended immense effort to achieve these accomplishments.

In this siting process, changes have been made to facilities throughout the Pre-Filing and application review periods to further refine the locations. These changes were often the result of landowner requests and negotiations. When landowners were willing to discuss the facilities, Rover made all possible adjustments to the locations to satisfy landowner requests. However, in situations where the landowner or the landowner's representative was unwilling to discuss whether or not the proposed facility was acceptable, Rover relied on the more commonly acceptable type of locations, as described above as being adjacent to roadways, not in front of a house, etc. At this point, Rover believes that the facilities are proposed in the best possible locations and considers the siting analysis to be complete.

Rover has obtained the land for approximately 62 percent of all aboveground facilities to date, including all of the proposed compressor station locations. Rover is offering to compensate landowners for the location of these facilities in excess of market value for the land required and will continue to negotiate in good faith with all landowners and their agents to acquire mutually acceptable easements for the proposed Project.

On Tract OH-ST-045.000, Mainlines A and B MLV-05 is proposed in the southwest corner of the approximate 80-acre tract, which is predominantly in cultivation. The site lies adjacent to Stone Avenue SW, with an electrical line along the west side of the road. The proposed MLV location is approximately 2,400 feet (0.45 mile) from the back side of the house, and is separated by a copse of trees. The MLV has been sited to not affect cultural or biological resources and to cause the least possible inconvenience to the landowner.

While it may be technically possible to find alternate locations for many of the proposed facilities, there would be limitations. In the case of tie-in facilities or meter stations, relocation would negatively affect the hydraulics of the system and would potentially violate the terms of executed shipper agreements. In the case of MLVs, moving one MLV significantly would possibly require the adjustment of other MLVs to maintain the required spacing. Minor relocations, such as moving from one landowner to the next, would be an arbitrary transference of impacts to other landowners, regardless of whether or not they are willing landowners at the new location.