

Rover Pipeline, Panhandle Backhaul, and the Trunkline Backhaul Projects

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5. *The applicants shall file detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, contractor yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, and documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas shall be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction in or near that area.***

This requirement does not apply to extra workspace allowed by the applicants' Plans and/or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resources mitigation measures;*
- b. implementation of endangered, threatened, or special concern species mitigation measures;*
- c. recommendations by state regulatory authorities; and*
- d. agreements with individual landowners*

Response:

Rover is requesting approval for the route variations and facility modifications detailed in Table 5 below that have not been previously identified in filings with the Secretary. This table also includes the FERC-requested route variations detailed below in other Environmental Conditions. Please refer to the Comparison Drawings referenced in the table. Please note that the mileposts for the Project have been reestablished to remove equations. Revised tables, also including FERC-requested route variations, route variations listed below, the reductions in wetlands, etc., will be submitted with the revised alignment sheets prior to construction.

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Table 5. Proposed Changes to the Rover Pipeline Project

Milepost	Comparison Drawing Number(s)	Summary of Change
Sherwood		
10.80	SW-P3-1011-C	Workspace reduction to avoid a barn.
37.20	SW-P3-1038-C, SW-P3-1039-C	Reroute to avoid newly constructed Eclipse Resources "Superpad".
46.30	SW-P3-1048-C	Reroute to the property line per landowner's request.
25.80	SW-P3-1054-C, SW-P3-1055-C	Reroute to avoid new MLV/L&R surface site and perm access road.
Seneca		
15.00	SN-P3-1017-C	Reroute to avoid small stream and wetland.
17.90	SN-P3-1020-C, SN-P3-1021-C	FERC Route Variation I2-6
24.40	SN-P3-1027-C	FERC Route Variation I2-7; reroute to the north side of existing pipeline corridor and AEP aerial transmission lines.
Clarington		
18.20	CL-P3-1020-C, CL-P3-1021-C	Reroute to avoid billboard.
26.60	CL-P3-1029-C, CL-P3-1030-C, CL-P3-1031-C	FERC Route Variation I2-8, reroute to avoid Consol wetland mitigation project
Burgettstown		
12.94	BG-P3-1014-C, BG-P3-1015-C	Reroute to avoid two existing oil well structures.
20.16	BG-P3-1022-C	Reduced temporary workspace to avoid water well.
29.40	BG-P3-1032-C	Reroute to adjust angle for pipeline crossings.
33.80	BG-P3-1037-C	Addition of ATWS to compensate for wetland workspace reduction.
41.10	BG-P3-1045-C	Reroute to avoid a driveway.
45.11	BG-P3-1049-C	Reroute to avoid an existing pipeline and parallel another existing pipeline.

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45.55	BG-P3-1049-C, BG-P3-1050-C, BG-P3-1051-C, BG-P3-1052-C	Reroute to avoid a permanent easement.
48.50	BG-P3-1052-C, BG-P3-1053-C	FERC Route Variation I2-1; reroute to avoid a future pond site at landowner's request.
49.62	BG-P3-1053-C	Reinstating some temporary workspace that was erroneously removed.
Mainline		
3.81	ML-P3-1005-C	Reroute to avoid a newly constructed Cardinal Pipeline.
5.96	ML-P3-1007-C, ML-P3-1008-C	Adjusting alignment to avoid overlapping easement with proposed Cardinal Pipeline.
8.15	ML-P3-1010-C	Adjusting alignment to avoid overlapping easement with existing Cardinal pipeline.
8.81	ML-P3-1010-C, ML-P3-1011-C	Adjusting alignment to avoid a water well in the permanent easement.
10.63	ML-P3-1012-C, ML-P3-1013-C	Reroute to avoid a newly constructed Cardinal Pipeline.
15.17	ML-P3-1017-C	Adjusting alignment to avoid overlapping esaement with proposed Marathon pipeline.
22.46	ML-P3-2004-C, ML-P3-2005-C	Adding additional workspace for spoil storage due to the proximity of a parallel Marathon Pipeline.
35.30	ML-P3-2018-C, ML-P3-2019-C	Relocate MLV 4 out of the USACE floodway easement. Also adjusting baseline and workspace to make a field bend near MLV4, where it was previously too close.
43.60	ML-P3-3004-C, ML-P3-3005-C	FERC requested reroute, adjust alignment across two tracts
47.17	ML-P3-3008-C	Adjusting alignment for a foreign pipeline crossing.
49.68	ML-P3-3011-C	Reroute to move MLV closer to the property line per landowner request.
52.20	ML-P3-3013-C	Adjusting alignment to avoid overlapping permanent easements with proposed line.
54.09	ML-P3-3015-C	Adjusting alignment at state's request for road crossing.
58.37	ML-P3-3019-C, ML-P3-3020-C	Adjusting alignment to avoid overlapping permanent easements with proposed line.
99.22	ML-P3-4022-C, ML-P3-4023-C	Adjusting alignment to cross Columbia pipelines at a minimum of 45 degrees.

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196.20	ML-P3-6026-C, ML-P3-6027-C	Adjusting alignment to reduce damage to drain tiles per landowner request. Additional workspace to compensate for reduction in wetland.
Market		
49.33	MK-P3-7050-C	Adjusting route to minimize impact to wetlands per MDEQ's request.
65.12	MK-P3-8010-C	Reroute to avoid a wetland per Landowner request
71.42	MK-P3-8016-C, MK-P3-8017-C	Add ATWS due to construction constraints.
75.99	MK-P3-8021-C	Adjusting centerline to avoid pipeline crossing and ornamental trees per landowner's request.
84.49	MK-P3-8030-C	Line adjustment to avoid a tract.
87.07	MK-P3-8033-C	Line adjustment to avoid a new pond.
88.21	MK-P3-8034-C, MK-P3-8035-C	Relocate MLV 8 and associated PAR, and adjust route accordingly.
89.95	MK-P3-8037-C	Additional workspace for Timber Trace Golf Course to avoid greens on opposite side.
99.13	MK-P3-8047-C	Additional workspace to facilitate full topsoil segregation

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12. As part of its Implementation Plan, Rover shall confirm the location of the Seneca Lateral within its non-exclusive easement and identify any locations where the lateral would deviate from the non-exclusive easement in accordance with recommendation 5. (section 2.2.1.2)

Response:

Rover proposes to utilize the currently proposed route and associated workspace for the Seneca Lateral as depicted in the alignment sheets submitted in March 2016, with the exception of two route variations requested in July 2016 in Rover’s response to FERC’s June 21, 2016 Request for Information and new route variations requested by FERC below in Environmental Condition No. 16 below. Table 1.3-2 from the 7(c) filing in February 2015 has been updated to depict the locations where Rover intends to collocate the Seneca Lateral with the Leach XPress.

Rover will utilize this proposed workspace regardless of whether Rover or Leach XPress constructs first. If Rover constructs first, the Seneca Lateral will be laid along the northern side of the proposed right-of-way, closer to the existing Texas Eastern pipelines. If Leach Xpress constructs first and is laid along the northern side of the proposed right-of-way where they also abut Texas Eastern, then the Seneca Lateral will be laid along the southern side of the proposed right-of-way in the sections shown below where Leach Xpress and Seneca intend to collocate. If Rover constructs the Seneca Lateral after Leach Xpress is constructed, Rover may be required to cross the Leach XPress pipeline more often than if Rover is constructed first, given the potential deviations from the Texas Eastern Pipelines that Leach Xpress is proposing; however, Rover does not intend to request any alternatives from the currently proposed route regardless of the order of construction.

Table 1.3-2. CGT Leach Xpress and Seneca Lateral Overlap

Begin MP	End MP	Mileage
2.41	2.75	0.35
3.28	3.57	0.29
3.67	5.99	2.32
6.21	7.01	0.80
7.38	8.48	1.09
9.81	13.09	3.28
13.32	13.70	0.38
14.37	14.99	0.62
15.32	15.65	0.32
16.00	16.17	0.17
16.62	19.89	3.27
Total Mileage		12.90

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13. Rover shall adopt the 3-mile-long Market Segment Alternative Section 2 to collocate the proposed pipeline with the ITC corridor. (section 3.4.1.3)

Response:

Within the Market Segment Alternative Section 2, ITC's corridor is 150 feet wide, with the nearest overhead electrical line approximately 55 feet east of the western edge of the ITC corridor. Due to safety requirements from the U.S. Department of Transportation (USDOT) 49 CFR Chapter 1 and Rover's engineering standards, Rover would not be able to operate construction equipment closer than 20 feet to the nearest overhead electrical line. The USDOT 49 CFR Ch. I states:

"Where a pipeline is located in proximity to electrical transmission tower footings, ground cables or counterpoise, or in other areas where fault currents or unusual risk of lightning may be anticipated, it must be provided with protection against damage due to fault currents or lightning, and protective measures must also be taken at insulating devices."

The principal limiting factors of construction are the sag of the wires and the distance from the conductors which must be maintained by equipment operators to ensure against electrical shock resulting from induced voltage. In the latter case, the Occupational Safety and Health Administration (29 CFR Ch. XVII) dictates:

Except where electrical distribution and transmission lines have been de-energized and visibly grounded at point of work or where insulating barriers, not a part of or an attachment to the equipment or machinery, have been erected to prevent physical contact with the lines, equipment or machines shall be operated proximate to power lines only in accordance with the following:

- (i) For lines rated 50 kV, or below, minimum clearance between the lines and any part of the crane or load shall be 10 feet;
- (ii) For lines rated over 50 kV, minimum clearance between the lines and any part of the crane or load shall be 10 feet plus 0.4 inch for each 1 kV over 50 kV., or Twice the length of the line insulator, but never less than 10 feet;
- (iii) In transit with no load and boom lowered, the equipment clearance shall be a minimum of 4 feet for voltages less than 50 kV, and 10 feet for voltages over 50 kV, up to and including 345 kV, and 16 feet for voltages up to and including 750 kV."

The contractor must adhere to these regulations at all times. In addition, the minimum clearance for lines 750 to 1,000 kV will be 20 feet. These guidelines are for ideal weather conditions only and the clearances must be greater under adverse weather conditions.

Setting the edge of the workspace 20 feet from the nearest overhead line would result in only 35 feet of usable workspace within the ITC corridor. The pipeline would be installed 25 feet from the edge of the workspace to allow for spoil storage, leaving 10 feet of additional workspace along the western edge of the ITC corridor. This right-of-way configuration would require an additional 40 to 90 feet of additional workspace within private property along the ITC corridor within tracts that are not currently impacted by the Preferred Route. Please refer to the enclosed Market Segment Alternative 2 figures.

This configuration would be possible at the southern end of Alternative Section 2, between milepost 83.9 and milepost 84.6 (0.7 mi). At milepost 84.6, the Alternative Section 2 would be forced to exit the ITC corridor to the west to complete an HDD of the Portage River while accommodating an existing Consumers

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Gas Pipeline, which abuts the ITC corridor to the west beginning near milepost 84.8. The workspace for the Alternative Section 2 would be 20 feet from the Consumers pipeline centerline, with the centerline of the Alternative Section 2 45 feet from the Consumers pipeline centerline. The HDD drill boxes and the permanent easement between would all be located on private landowners adjacent to the Consumers corridor that have not previously been affected by the proposed Project.

Following the HDD and Consumers Gas Pipeline exiting the ITC corridor near 85.2, Rover would again adopt the configuration noted above utilizing 35 feet of the ITC corridor and temporary workspace between 40 and 90 feet within private property adjacent to the ITC corridor. This second collocated segment would extend to approximate milepost 85.7 (0.5 mile), where Rover would begin an HDD of an approximate 1,800-foot, saturated wetland complex within a tract owned by the Village of Pinckney. Within this HDD, the ITC corridor turns west, and the Alternative Section 2 would cross the ITC corridor at an approximate 13 degree angle. It would not be possible to follow the ITC corridor in this area because there would be no place to place a drill rig along that trajectory. ITC requests that crossing angles be no less than 45 degrees, making the HDD crossing angle impracticable. In addition, engineering the HDD to cross the ITC corridor at a 45 degree angle would result in the HDD path crossing under multiple houses within a residential area located to the east, and workspace requirements for an HDD drill box within the residential area. Performing another HDD or open cutting a route back to the proposed ITC corridor would also increase impacts to the residential area and potentially require the purchase of additional residences. Therefore, both the HDD crossing the ITC corridor at a 13 degree angle or a 45 degree angle would be infeasible. Further, the property the HDD would cross has documented contamination, which is not permitted by Rover's construction and engineering specifications. As noted in the 7c application filed in February 2015 and in the June 2015 supplemental FERC filing, this situation is the reason the Alternative Section 2 was dismissed from further consideration and the Preferred Route was developed. A partial copy of a landowner-provided Section 7a Compliance Analysis Due Care Report on the site, referred to as the Former Patterson Lake Products Site, is included under **Privileged** as it does not appear to be publically available. In addition, a news article from MLive Media Group is also included, which refers to the report and the documented contamination of the site.

If the 13 degree HDD was allowed by ITC and Rover's engineering and construction specifications, a third HDD would also be required to cross a second forested wetland complex prior to returning to the ITC corridor. This HDD would also require workspace for drill boxes and permanent easement within privately owned tracts east of the ITC corridor would not otherwise be impacted by the proposed Project. The three HDDs would also directly affect 3 private driveways during installation, which could put a burden on the landowners.

The following is a table comparing the Preferred Route and Alternative Section 2. In addition, extensive surveys for the eastern massasauga rattlesnake have been conducted over two seasons on the Preferred Route, with no documented occurrences. Surveys for potential habitat or species occurrence have not been conducted within the Alternative Section 2.

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**Revised TABLE 10D-29
Comparison of the Proposed Route and Market Segment Alternative 2**

Environmental Factor	Unit	Market Segment - MPs 83.88 – 86.82		Variance ¹
		Market Segment Alternative 2	Proposed Route	
Total length	miles	2.97	2.97	0.00
Length adjacent to existing rights-of-way	miles	0.00	2.07	2.07
Total construction right-of-way	acres	42.41	35.29	-7.12
Emergent wetlands	acres	0.48	3.14	2.67
Scrub-shrub wetlands	acres	1.68	0.33	-1.35
Forested wetlands	acres	1.32	2.26	0.94
Forest	acres	27.31	16.16	-11.15
Agricultural land	acres	12.25	15.11	2.86
Open land	acres	2.56	3.72	1.16
Permanent right-of-way	acres	18.08	11.23	-6.84
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	1	1	0
NRHP Listed Properties within 500 feet	number	0	0	0
Roads crossed	number	0	0	0
Railroads crossed	number	0	0	0
Tracts crossed	number	22	12	-10
Residences within 50 feet of the centerline	number	1	0	-1
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.06	0.07	0.01

¹ Variance calculated by subtracting FERC Market Segment Alternative 2 Route from the Preferred Route.

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14. Rover shall adopt the two route variations at MPs BGL 48.9 and MAB 44.0 (as specified in table 3.4.3-1 and depicted in appendix I2 of the EIS) and file with the Secretary revised alignment sheets for the Burgettstown Lateral and Mainlines A and B that incorporate these variations into the Rover Project **prior to the start of construction.** (section 3.4.3)

Response:

Below is a portion of Table 3.4.3-1 wherein Rover has addressed the FERC requested variations in the far right column.

TABLE 3.4.3-1 Revised Analysis of Variations Discussed in the Draft EIS

Land Parcel ID	MP	Description of Requested Minor Route Deviation	Rover’s Response to the Recommendation in the Draft EIS	FERC Assessment and Conclusion or Recommendation	Rover’s September 2016 Recommendation
Adam, Larry & Marie (OH-CA-HL-065.000, OH-CA-HL-066.000)	BGL 48.9	Landowners raised concerns about the proximity of the pipeline to their home, approximately 200 feet, and damage to their hay field.	“The pipeline is approximately 400 feet from the house. Correspondence with landowner has been limited by attorney.”	Rover has not evaluated a variation on the property. Additionally, Rover’s statement is incorrect as the residence on parcel OH-CA-HL-066.000 does appear to be about 250 feet from the centerline. Based on our analysis, moving the route as requested would not result not impact any additional landowners or result in a greater impact on environmental resources. Given that the landowner request does appear reasonable, we recommend that Rover adopt the route variation depicted in appendix I, figure I2-1, which would move the pipeline about 200 feet further to the south, closer to the edge of the agricultural field and further from the residence.	Rover surveyed the FERC-proposed route variation, but was approached by the landowner to adopt a variation. Rover has agreed to the landowner variation. See Comparison Drawings BG-P3-1052-C and BG-P3-1053-C.
Lahr, Terrence (OH-ST-024.000)	MAB 44.0	Landowner requested reroute to avoid future building site and property access (driveway). The	“Rover reviewed the route proposed by the landowner. There is a steep ravine along the southern portion of his property	Proposed route not acceptable. In order to prevent the pipeline route from entering the parcel at its current location, at least three additional	Rover has surveyed and will adopt the FERC-proposed route variation. See

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Land Parcel ID	MP	Description of Requested Minor Route Deviation	Rover's Response to the Recommendation in the Draft EIS	FERC Assessment and Conclusion or Recommendation	Rover's September 2016 Recommendation
		requested reroute includes crossing Blough Avenue further south, through a neighboring parcel before entering commentor's parcel along his southern property boundary.	that would prevent construction and operation of the pipeline. The landowner's ability to access the property will be maintained throughout construction."	landowners would be impacted. Therefore, the proposed route at the entrance of the parcel is the preferred route. However, based on our desktop review, we have determined that a variation along the southern portion of the property boundary is feasible. Therefore, we recommend Rover adopt the variation depicted in appendix I2, figure I2-2.	Comparison Drawings ML-P3-3004-C and ML- P3-3005-C.

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15. Rover shall adopt the route variations and/or alternative construction techniques for MPs SHL 34.4, MJL 7.2, and BGL 37.1 (as specified in table 3.4.3-2 and depicted in the corresponding figure in appendix I2 of the EIS) and adopt workspace modifications for MPs SEL 10.0, MS 73.45, CLL 8.0, and SEL 22.7, or file with the Secretary written documentation that Rover and the landowner have reached an alternative agreement. Additionally, Rover shall file with the Secretary revised alignment sheets for the Sherwood Lateral, Majorsville Lateral, Burgettstown Lateral, Seneca Lateral, Market Segment, and Clarington Lateral that incorporate these variations into the Rover Project **prior to the start of construction.** (section 3.4.3)

Response:

Below is a portion of Table 3.4.3-2 wherein Rover has addressed the FERC requested variations in the far right column.

TABLE 3.4.3-2 Minor Route Variation Analysis of Residences within 10 feet of Construction Workspace

Project Segment	Parcel Number	MP	FERC-Requested Minor Route Variation	Rover's Analysis/Response	FERC Conclusion	Rover's September 2016 Recommendation
Seneca	OH-MO-SCL-045.000	10.0	Move the construction workspace further from the residence (currently 0.4 feet from residence).	NA – This residence was previously more than 500 feet from the construction workspace. However, due to the addition of the Madison Meter Station in March 2016, this residence is now within 10 feet.	The apparent level of effort demonstrated by the applicant to minimize impacts on this landowner during construction appears to be insufficient. Given that alternatives exist to further minimize impacts during construction, we recommend that Rover reduce the width of the construction right-of-way in the vicinity of this residence or otherwise move it further from the residence. We did not receive any comments from the owner of this parcel.	This property has been purchased by Antero, the producer with which Rover is connecting at this location, and Antero intends to assign rights for the Madison Meter Station to Rover. This property is no longer an occupied private residence

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Project Segment	Parcel Number	MP	FERC-Requested Minor Route Variation	Rover's Analysis/Response	FERC Conclusion	Rover's September 2016 Recommendation
Market Segment	MI-WA-082.520	73.45	Move the construction workspace further from the residence (currently 5.1 feet from residence).	NA – The residence was previously about 30 feet from the construction workspace. However, due to a reroute in March 2016, this residence is now within 10 feet.	The apparent level of effort demonstrated by the applicant to minimize impacts on this landowner during construction appears to be insufficient. Given that alternatives exist to further minimize impacts during construction, we recommend that Rover reduce the width of the construction right-of-way in the vicinity of this residence or otherwise move it further from the residence. We did not receive any comments from the owner of this parcel.	Rover has purchased this easement as previously proposed.
Sherwood	OH-MO-SHC-003.000	34.4	As requested in the draft EIS, adjust the HDD crossing location and exit pit location as depicted in appendix I, figure I2-3.	This residence is within the path of the HDD crossing of the Ohio River. Several alternatives for this crossing have previously been submitted. Rover indicated it is continuing to coordinate with the landowner to reach an agreement to purchase the tract.	Proposed route not acceptable. If an agreement to purchase the property cannot be reached, we recommend that Rover adopt the identified route variation (see appendix I2, figure I2-3). We did not receive any comments from the owner of this parcel.	Rover has purchased this easement as previously proposed.

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Project Segment	Parcel Number	MP	FERC-Requested Minor Route Variation	Rover's Analysis/Response	FERC Conclusion	Rover's September 2016 Recommendation
Majorsville	WV-MA-ML-038.000	7.2	This residence is crossed by the centerline. As requested in the draft EIS, adopt the route variation identified in appendix I2.	Rover is continuing to coordinate with the landowner to reach an agreement to purchase the tract.	Proposed route not acceptable. If an agreement to purchase the property cannot be reached, we recommend that Rover adopt the, identified route variation (see appendix I2, figure I2-4) or implement a trenchless crossing such as a horizontal directional drill. We did not receive any comments from the owner of this parcel.	Rover has purchased this easement as previously proposed.
Burgettstown	OH-CA-HL-011.100	37.1	As requested in the draft EIS, adopt the route variation identified in appendix I2.	The house is under construction. Rover has provided a route variation around the property. The variation is similar in length to the proposed route. Rover is continuing to coordinate with the landowner to reach an agreement to purchase the tract. However, Rover has stated that if the landowner would prefer the variation around the residence, Rover would evaluate the variation through surveys.	Proposed route not acceptable. If an agreement to purchase the property cannot be reached, we recommend that Rover adopt the identified route variation (see appendix I2, figure I2-5). We did not receive any comments from the owner of this parcel.	Rover has purchased this easement as previously proposed.
Clarington	OH-BE-CC-043.000	8.0	Analysis for residence within the construction workspace that has not yet been purchased by Rover.	NA – Structure was not previously identified as a residence. Rover filed updates in March 2016 that now indicate the structure as a residence.	Proposed route not acceptable. We recommend that Rover reduce the Rover Project workspace to avoid the residence. We did not receive any comments	Rover has purchased this easement as previously proposed.

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Project Segment	Parcel Number	MP	FERC-Requested Minor Route Variation	Rover's Analysis/Response	FERC Conclusion	Rover's September 2016 Recommendation
					from the owner of this parcel.	
Seneca	OH-MO-SCL-118.000	22.7	Analysis for residence within the construction workspace that has not yet been purchased by Rover.	NA – This residence was previously more than 500 feet from the construction workspace. However, due to the addition of the Madison Meter Station March 2016, this residence is now within the construction workspace.	Proposed route not acceptable. We recommend that Rover reduce the Rover Project workspace to avoid the residence. We did not receive any comments from the owner of this parcel.	The portion of this property that includes the barns and outbuildings has been purchased by RICE, the producer with which Rover is connecting at this location. RICE intends to assign rights for the Gulfport Meter Station to Rover. However, RICE did not purchase the portion of the tract that includes the house and an additional outbuilding. Therefore, Rover has amended the proposed workspace at this location to exclude the residence. Please refer to the revised Residential Plan OH-MO-SCL-118.000 indicating the

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Project Segment	Parcel Number	MP	FERC-Requested Minor Route Variation	Rover's Analysis/Response	FERC Conclusion	Rover's September 2016 Recommendation
						workspace will now be 51.3 feet from the residence. Rover does not intend to purchase this residence.

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16. Rover shall adopt the minor route variations for MPs SWL 35.3, SEL 19.0, SEL 24.0, CLL 27.9, MJL 13.5, MAB 44.0, and MS 65.0 (as specified in table 3.4.3-3 and depicted in appendix I2 of the EIS) and adopt the additional mitigation measures for MP BGL 1.0 (see table 3.4.3-3). Rover shall file with the Secretary updated alignment sheets incorporating these minor route variations prior to the start of construction. (section 3.4.3)

Response:

Below is a portion of Table 3.4.3-3 wherein Rover has addressed the FERC requested variations in the far right column.

Table 3.4.3-3. Assessment of Minor Route Variations Requested by Stakeholders After Issuance of the Draft EIS

Land Parcel ID and Comment ID	MP	Requested Minor Route Deviation Description	Summary of Rover's Response to the request	FERC Assessment and Conclusion or Recommendation	Rover's September 2016 Recommendation
Petersen, Dean and Jenny (OH-MO-SHC-006.000) Comment ID: CO12	SWL 35.3	Commentor states that the proposed route would run directly through an existing residence/hunting cabin on the property and requests a reroute that would avoid the cabin.	Rover stated that alternative routes in this area are severely constrained by topography, and constructing along steep side slopes more than absolutely necessary would increase the potential for hillside slips and maintenance issues, which would affect the scenic nature of the area. Rover does not believe that a reroute in this area is constructible without creating major maintenance issues in the future.	Proposed route not acceptable. Our analysis of desktop data indicates that it is feasible for Rover to adopt a route variation that is constructible and avoids the need to remove the landowner's cabin. We agree that merely shifting the pipeline route to the north or south of the cabin would result in some side-slope construction. However, we have identified a minor alternate configuration that generally follows the natural contours of the topography in the vicinity, avoids the cabin, and keeps side-slope construction to a minimum. Therefore, we recommend that Rover adopt the route variation as depicted in appendix I2, figure I2-3 or provide documentation of landowner concurrence with an alternate route variation that may better address the landowners concern.	Rover has closed this easement as previously proposed.

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Aberegg, Michael (OH-MO-SCL-098.000, OH-MO-SCL-100.000, OH-MO-SCL-101.000) Comment ID: IND91	SEL 19.0	Commentor requests that the pipeline be rerouted off of his property due to multiple pipelines already present.	Rover stated it has routed the proposed pipeline to parallel the existing pipelines through the property to avoid steep slopes and forested areas.	Proposed route not acceptable. The pipeline is only collocated with the Texas Eastern pipeline for a portion of the route on the parcel. We believe Rover's routing of the pipeline parallel to the Texas Eastern pipelines on the southern portion of the commenter's property would limit impacts on the parcel and allow collocation through a larger portion of the parcel. Therefore, we recommend that Rover adopt the variation as depicted in appendix I2, figure I2-6.	Rover will adopt the FERC proposed variation; however, Rover intends to follow the Leach Xpress Pipeline route through this area so that Rover can collocate within the same easement. Please refer to Comparison Drawings SN-P3-1020-C and SN- P3-1021-C.
Forni, Don (OH-MO-SCL-127.000, OH-MO-SCL-128.000) Comment ID: PM6-53	SEL 24.0	Commentor requests reroute of pipeline to opposite side of existing foreign pipelines currently on property to reduce impacts on land and drain tiles.	Rover indicated that the proposed route follows existing easements through the entirety of the tract. However, in July 2016, Rover filed a route variation that moved the pipeline to the opposite side of the existing easement for a portion of OH-MO-127.000.	Proposed route not acceptable. Our desktop analysis indicates the reroute suggested by the commentor would reduce impacts on forested land, wetlands, and waterbodies. Rover's July 2016 adopted variation only addressed a portion of the requested variation from the landowner. Therefore, we recommend Rover adopt the minor route variation as depicted in appendix I2, figure I2-7.	Rover will adopt the FERC proposed route variation in this area. Please refer to Comparison Drawing SN-P3-1027-C.
CONSOL Mining Company	CLL 27.9	Landowner requested an alternative to avoid the wetland and stream mitigation area on the parcel. The mitigation site	Impacts on these resources would be temporary. Rover would be required to restore the area in accordance with its permits as well as through adherence to its Plan and Procedures. Rover reviewed the commentor's	Rover's response not acceptable. We reviewed the commentor's requested reroute and have concluded that the route appears feasible. However, we acknowledge that the reroute would result in additional impacts on forested land. We believe that the proposed route is acceptable but may result in a	Rover has coordinated with CONSOL Mining Company to identify a route variation that avoids impacting the restored wetland and stream resources on the CONSOL property. Please refer to Comparison Drawing CL-P3-1029-C, CL-P3-1030-C, and CL-P3-1031-C.

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		was created as part of the company's OHEPA section 401 and the COE's section 404 permits.	alternative and determined that it did not offer a significant advantage over the proposed route.	violation of terms and conditions of CONSOL's section 401 and 404 permits. Therefore, we recommend that Rover either adopt the route variation depicted in appendix I2, figure I2-8 or consult with the appropriate federal and state agencies regarding the crossing of the mitigation site (see recommendation in section 4.4.3).	
Craig Wilson of the Emens & Wolper Law Firm (on behalf of Shane Florence) (OH-BE-ML-021.000) Comment ID: CO23	MJL 13.5	Requested a reroute of the pipeline 50 to 100 feet to either side of current route so that the pipeline is off of the ridge where the landowners plan to build a home.	Rover stated that alternative routes in this area are severely constrained by topography. Construction along steep side slopes more than absolutely necessary would increase the potential for hillside slips and maintenance issues. Rover does not believe that a reroute in this area is constructible without creating major maintenance issues in the future.	Proposed route not acceptable. Desktop review indicates rerouting the pipeline off of the ridge on the commentor's parcel is feasible. Therefore, we recommend that Rover adopt the route variation identified in appendix I2, figure I2-9 or file an alternate variation acceptable to the landowner.	Rover has surveyed the FERC proposed route variation and has determined that it is not constructible given the severe, 21-24% side slopes, which would be unfeasible to maintain during operation of the pipeline. Rover maintains that the previous route is the preferred route and requests that FERC reinstate the route as the proposed route.
Zagari Jr., Rocco (PA-WA-HL-040.000) Comment ID: IND60	BGL 1.0	Landowner is concerned that the pipeline would cut off his horses from their barn and water supply, and impact the	The requested reroute would involve placing the 36-inch Burgettstown Lateral between barns that are approximately 80 feet apart and would involve impacts on an existing water	Rover's response not acceptable. We were unable to identify a viable route preferable to the proposed route. Desktop review confirms Rover's response. Additionally, rerouting of pathway east of the landowner's barn would result in long-term impacts on upland forest habitat; whereas the	Rover will coordinate with the landowner to ensure that the horses have access to the barn and water supply during construction.

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Land Parcel ID and Comment ID	MP	Requested Minor Route Deviation Description	Summary of Rover's Response to the request	FERC Assessment and Conclusion or Recommendation	Rover's September 2016 Recommendation
		pasture land. Requested to reroute pipeline pathway between or behind (north of) barns on the landowner's property.	well between the barns and the road.	proposed route would result in temporary loss of access to pasture. However, while we did not identify a reroute on the property that is technically feasible, since Rover did not provide information that it had coordinated with the landowner to avoid impacts on the landowner's horses, we recommend that Rover maintain access to the barn and water supply, during construction, for the horses on the property.	
Lahr, Terrence (OH-ST-024.000) Comment ID: IND37, IND76, IND95, IND124	MAB 44.0	Requested a reroute of the pipeline pathway along the southern border of parcel OH-ST-024.000 and through four additional parcels south of OH-ST-024.000 to allow clear-cut of preferred southern edge of parcel and to maintain road access to landowner's property.	The requested reroute would affect four additional property owners not currently affected by the Rover Project and would cause increased impacts on forested wetlands. Accommodations can be made to maintain road access to property.	Proposed route not acceptable. See our conclusion for the landowner's reroute request in table 3.4.3-1 where we have recommended a minor route variation that would address some of the landowner's concerns, but would not impact any additional landowners.	Rover has surveyed and will adopt the FERC-proposed route variation. See Comparison Drawings ML-P3-3004-C and ML- P3-3005-C.

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Land Parcel ID and Comment ID	MP	Requested Minor Route Deviation Description	Summary of Rover's Response to the request	FERC Assessment and Conclusion or Recommendation	Rover's September 2016 Recommendation
Daniel, David A & Daniel, Jeanne L. Trust (MI-WA-043.000; MI-WA-043.000) Comment ID: IND5, IND89, IND123, IND126, IND127, IND131	MS 65.0	In order to avoid a stream and forested wetland on the property, the commentor requests to reroute the pipeline closer to the southern border of the parcel.	The pipeline was rerouted in June 2015 to avoid closely paralleling and multiple crossings of a stream and wetland complex as depicted in the Appendix 10F within the June 2015 supplemental filing to FERC. The reroute crosses the same landowners as the previous route. Prior to field surveys, Rover had estimated resources on the property by publicly available data. Following field surveys, Rover was able to verify and refine the types, locations, and extent of ecological resources on the property to calculate the proposed impacts and accurately permit and mitigate with applicable agencies. Similar stream and wetland complexes are present on adjacent properties.	Proposed route not acceptable. After the issuance of the draft EIS, Rover provided the FERC with updated survey data for the parcel. Desktop review indicates that a slight adjustment of pipeline right-of-way towards the southern borders of MI-WA-043.000 and MI-WA-044.000 would avoid impacting the newly identified forested wetlands. Based on our analysis, we recommend that Rover adopt this minor route variation (see appendix I2, figure I2-10).	Rover has adopted the FERC proposed route variation. See Comparison Drawing MK-P3-8010-C.

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24. Prior to construction, Rover shall adopt the alternative route at MP CLL 27.8 as identified in table 3.4.3-3 and as depicted in appendix I2 of the EIS or provide documentation from the OHEPA and the COE describing how Rover's proposed route would not conflict with or result in a violation of any terms and conditions of the Clean Water Act permits issued to the CONSOL Mining Company. (section 4.4.3)

Response:

Rover has coordinated with CONSOL Mining Company to identify a route variation that avoids impacting the restored wetland and stream resources on the CONSOL property. Please refer to Comparison Drawings CL-P3-1029-C, CL-P3-1030-C, and CL-P3-1031-C.

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25. *Prior to construction, Rover shall file revised alignment sheets that limit its construction right-of-way width in areas of dual pipeline to 95 feet and in areas of single pipeline to 75 feet in all wetlands. (section 4.4.4)*

Response:

Rover will comply with the reduced workspace requirements for all types of wetlands. Revised alignment sheets reflecting the required construction right-of-way limitations will be submitted prior to construction pursuant to Environmental Condition No. 4. Rover has identified the following four locations where additional workspace will be required to construct while utilizing the reduced workspace.

Burgettstown Lateral, MP 33.8 – Rover agrees to reduce the workspace to 75 feet within these wetlands and requests additional temporary workspace (ATWS) outside of the wetland areas to accommodate spoil storage and provide additional maneuvering space. The wetland complex is approximately 600 feet long and the wetland is typically saturated. This location includes significant elevation changes, a 50 degree point of inflection, and a railroad crossing, which complicate construction in this area. The 25' x 160' and 26' x 85' ATWS would be within 10 feet of the adjacent wetland. This workspace will be required for spoil storage to conventionally bore under the railroad tracks at a depth of 11 feet below the rail, resulting in a trench 15 feet deep, 30 feet wide, and 150 feet long to contain the boring equipment. The 25' x 190' would be within 25 feet of the adjacent wetland and would be utilized for the spoil storage to cross the creek and wetland area. Rover is requesting site-specific approval for these ATWS. Please refer to Comparison Drawing BG-P3-1037-C.

Market Segment, MP 70.8 – Rover agrees to reduce the workspace to 75 feet within these wetlands and requests four 25' x 100' ATWS areas for spoil storage to facilitate crossing of two streams within the wetland. This wetland is approximately 1,350 feet long and is typically saturated. Carrying spoil out of the wetland for temporary storage would require additional passes and would cause additional impact to the wetland soils and hinder revegetation. Please refer to Comparison Drawing MK-P3-8016-C.

Market Segment, MP 71.8 – Rover agrees to reduce the workspace to 75 feet within these wetlands and requests ATWS areas within the wetlands to accommodate spoil storage to facilitate the bored crossing of S. Lima Center Road within the wetland. The conventional bore will require a trench 10 feet deep, 25 feet wide, and 125 feet long to accommodate the boring equipment. This wetland complex is approximately 1,100 feet long, is typically saturated, and is bordered by Mill Creek (S2K-WA-122) on the south side and the road on the north side. Carrying spoil out of the wetland for temporary storage would require additional passes and would cause additional impact to the wetland soils and hinder revegetation. Please refer to Comparison Drawing MK-P3-8017-C.

Market Segment, MP 86.71 – Rover requests to maintain the previously proposed construction workspace within this wetland. This is the only wetland area that Rover believes it will not be able to construct in a reduced workspace. This wetland includes an open cut crossing of Honey Creek, which is a perennial stream approximately 28 feet wide at the pipeline centerline. The wetland is a saturated floodplain of Honey Creek and is bordered on the south side by the ITC corridor with multiple overhead lines. A portion of the temporary workspace within the ITC corridor was reduced to avoid an overhead power pole. To accommodate the reduced workspace as well as a 46 degree points of inflection on both sides of the ITC corridor, Rover previously requested a 45' x 205' ATWS just south of the ITC corridor. The wetland is bordered to the north by the tract MI-LI-021.500, which is addressed in Environmental Condition 35 below. This tract is proposed for development and Rover has reduced the workspace within the tract to accommodate the storage buildings and retainage pond installed by the landowner within the previously

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proposed workspace. Rover would not be able to increase the workspace to the north within this tract. Please refer to Comparison Drawing MK-P3-8033-C.

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30. During construction of the Project, Rover shall restrict construction activities (including tree clearing) to between October 31 and March 15 in areas identified as potential eastern massasauga rattlesnake habitat. (section 4.7.2)

Response:

Rover conducted intensive, targeted surveys for the eastern massasauga rattlesnake in areas of potential habitat during seasonally appropriate times between approximate Market Segment MPs 83.9 and 84.0 in Washtenaw County, and between MPs 85.2 and 87.85 in Livingston County, Michigan. These surveys included use of artificial cover objects (ACOs) and multiple visits in April, May, and July 2016. No Eastern massasauga rattlesnakes were observed (see attached survey report). Further, no suitable habitat was found at one site in Wooster Township, Wayne County, Ohio.

As noted in the FEIS, the eastern massasauga rattlesnake live in wet areas, including wet prairies, marshes, and low areas along lakes and rivers, and use adjacent uplands during the summer for foraging. Wetland communities including, fens, bogs, sedge meadows, and wet prairies are utilized from early fall until late spring where the snakes hibernate underground in crayfish chimneys or small mammal burrows (Harding 1997). Studies have shown high fidelity toward overwintering sites and they will often return to the same location each year (Johnson 2000; Smith 2009). They move to adjacent upland habitats including open shrubby fields and grasslands during the summer where warm weather provides opportunities for foraging and development of young (Harding 1997). Within the upland habitats, this species typically avoids closed canopy forests and those that do enter these areas are found where sunlight penetrates the canopy (Center for Reptile and Amphibian Conservation and Management).

Because the species is not known to use forested areas extensively for either foraging or hibernation, and in the absence of any documented occurrences of the species during 2015/2016 surveys, the restriction on tree clearing provides no significant protection for this species. Rover therefore respectfully requests that this restriction be removed.

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32. Prior to removing barns or other structures that represent potential barn owl habitat, Rover shall evaluate and assess each barn or similar structure for the presence of barn owls. Rover shall file with the Secretary the results of the surveys and identify any additional mitigation measures developed in consultation with the OHDNR, for review and written approval of the Director of OEP. (section 4.7.3)

Response:

Rover biologists conducted surveys of the seven barns to be removed from the Project on July 11, 2016. No primary or secondary signs of barn owl use were observed in any of the seven assessed structures. Based upon this review, structures to be removed during the course of project construction are either not suitable for use by nesting barn owls, or not currently being used by barn owls and have not been used by barn owls in the recent past. As such, no impacts to the species are expected to occur as a result of the proposed Project.

A survey report was submitted to the Ohio Department of Natural Resources, Division of Wildlife (DOW) on August 1, 2016 (attached). The DOW responded on August 3, 2016 via email and concurred with Rover's conclusions regarding this species and no further coordination related to that species was recommended at this time (attached). No mitigation measures were required by the DOW regarding this species.

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35. ***Prior to construction**, Rover shall file with the Secretary documentation of its consultations with the landowner of parcel MI-LI-021.500, including evidence that clarifies how the pipeline will impact the planned development of the parcel as approved by Putnam Township. (section 4.8.3.2)*

Response:

In coordination with the landowner, Rover has reduced the workspace and adjusted the centerline within tract MI-LI-021.500 to accommodate a proposed sediment pond. Rover has purchased the easement. Please refer to Comparison Drawing MK-P3-8033-C.