



ROVER PIPELINE
An ENERGY TRANSFER Company

ROVER PIPELINE LLC

Rover Pipeline Project

***ENVIRONMENTAL
COMPLAINT RESOLUTION PROCEDURE***

February 2015

Introduction:

Rover Pipeline LLC (Rover) understands the importance of timely resolution of environmental complaints during construction and restoration of the Rover Pipeline Project (or Project). The Project, as currently proposed, is a new natural gas pipeline system that will extend from the vicinity of New Milton, Doddridge County, West Virginia through West Virginia, Pennsylvania, Ohio and Michigan to the United States (U.S.)/Canada border near East China, St. Clair County, Michigan. The objective of this *Environmental Complaint Resolution Procedure* is to encourage contact from landowners and local stakeholders as a means of understanding concerns regarding the Project and providing Rover with the information needed to resolve these issues in a timely manner.

Contact Methods:

There are three levels of contacts available to record an environmental complaint and seek resolution to an issue stemming from the Project. This contact information will remain available before and during construction, and until restoration is completed.

1. Phone call or e-mail to Rover's Designated Local Contact

- Right-of-Way Agent; or
- Mark Vedral at Mark.Vedral@energytransfer.com

A Rover representative is expected to respond within 2-4 hours of the initial inquiry during normal business hours. If a Rover representative does not establish contact within this timeframe, a landowner or stakeholder may contact Rover's Toll-free Number to document their concern or to request a follow-up contact.

2. Phone call to Rover's Toll-free Number

- 1-888-844-3718

If unsatisfied with the response from Rover's Local Contact, the next step in the complaint procedure would be a phone call to the Rover's Toll-free Number at Rover's main offices. Rover's Toll-free Number is a 24-hour line dedicated to individuals calling to report an environmental complaint. Calls received on this line will be sent to voicemail, and the caller will be asked to leave a message describing the concern and a daytime phone number at which he or she may be reached. On normal business days, Rover's Toll-free Number voicemail system is checked each morning and several times throughout the day. A Rover representative is expected to respond within one business day of receipt of the phone message at Rover's Toll-free Number.

3. *Contact the Federal Energy Regulatory Commission's (FERC) Enforcement Hotline*

- 1-888-889-8030

If not satisfied with the response received from Rover staff, the next step is to contact the FERC at FERC's Enforcement Hotline. The Project is listed under FERC Docket Number PF14-14-000.

Information Needed for Resolution:

Rover representatives will need as much information as possible in order to track a complaint and adequately resolve the issue. Information needed includes:

- date when the event or concern occurred,
- date and time of the call to the Designated Local Contact or other Rover contact,
- name of the individual making complaint,
- contact phone number for the individual making complaint,
- location where the issue is occurring,
- description of the problem or concern,
- if this is an emergency or time-sensitive complaint,
- if this is a safety issue for the individual making the complaint or the public,
- if the complaint is believed to be a violation of applicable statutory standards or regulatory requirements, and
- what the preferred method is for follow-up and resolution of the complaint (e.g., phone, e-mail or U.S. mail).

Dispute Resolution and Issue Status:

Once the complaint is recorded and additional information is received, a Rover representative will investigate the situation by assessing the environmental problem or concern. This will be accomplished through site visits and communications with Rover personnel, contractors, stakeholders and other local residents. Following the investigation, a complaint resolution plan will be developed and implemented. Issues related to safety and time sensitive issues will receive the highest priority.

Follow-up communications informing the reporting individual of the status of the complaint resolution will be completed according to the method requested (e.g., phone, e-mail or U.S. mail). Environmental complaints and the status of their resolution will be recorded in Rover's weekly status reports as required by the FERC in any Order authorizing the Project.

Complaint Minimization and Prevention Methods:

Rover will adhere to the requirements in its environmental mitigation plans and the permits/clearances issued for the Project, as well as the requirements in this procedure, to minimize the occurrence of

environmental complaints and resolve concerns promptly. To assist in maintaining a high level of compliance, Rover will implement the following:

- *Environmental Training*

Environmental training and awareness programs for all construction personnel will be conducted prior to the start of construction and on an ongoing basis during construction to maintain compliance with environmental conditions and landowner requirements.

- *Environmental Inspection Field Presence*

Environmental Inspectors will have a prominent presence on the Project both during the preconstruction field reviews and active construction. During construction, the Environmental Inspectors will verify that work is conducted in an environmentally responsible manner in compliance with the Project's environmental permits and commitments.

- *Commitment to Teamwork and Joint Problem Solving*

Every effort will be made to resolve issues quickly in order to avoid more significant resource/landowner impacts. In the event of recurring or significant environmental issues, relevant Project representatives (i.e., construction, engineering, land, and environmental) will work jointly to develop and implement responsive resolutions as efficiently as possible. This team approach has, at its foundation, shared responsibility for environmental compliance.

- *Clear and Responsive Communication*

Environmental and construction representatives will interact daily and maintain professional, responsive communications at all times. All Project personnel will interact closely so that environmental and landowner information, concerns, and issues requiring resolution are communicated in a timely manner. All Project personnel, irrespective of their roles or reporting relationships, will make every effort to communicate about current situations so that compliance issues, and particularly landowner concerns, can be addressed immediately.

- *Strong Quality Assurance Effort*

Rover will provide ongoing quality assurance on the Project. The Environmental Compliance Manager will provide support to the environmental inspection staff, oversee the compliance effort, monitor the effectiveness of the Project's environmental and landowner commitments, and evaluate on a continuous basis the effectiveness of the environmental inspection effort throughout the Project to achieve Rover's high standard of quality.