



*1. Each applicant shall each follow the construction procedures and mitigation measures described in its application and supplements, including responses to staff data requests and as identified in the EIS, unless modified by the Order. Each applicant must:*

- a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);*
- b. justify each modification relative to site-specific conditions;*
- c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and*
- d. receive approval in writing from the Director of OEP **before using that modification.***

**Response:**

Applicants will comply with the above listed requirements.



2. *The Director of OEP has delegated authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the Projects. This authority shall allow:*

- a. the modification of conditions of the Order; and*
- b. the design and implementation of any additional measures deemed necessary (including stop-work authority) to ensure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from construction and operation of the Projects.*

**Response:**

Applicants will comply with the above listed requirements.




3. ***Prior to any construction***, each applicant shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, EIs, and contractor personnel will be informed of the EIs' authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs **before** becoming involved with construction and restoration activities.

**Response:**

Below is the Affirmative Statement signed by Mr. Joey Mahmoud, Executive Vice President.

**AFFIRMATIVE STATEMENT  
OF  
ROVER PIPELINE LLC**

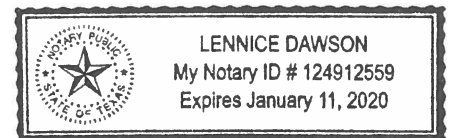
**Mr. Joey Mahmoud**, being duly sworn on his oath, states that he is Executive Vice President, Engineering and Construction for Rover Pipeline LLC, Panhandle Eastern Pipe Line Company, LP, and Trunkline Gas Company, for the Rover Pipeline Project, Panhandle Backhaul Project, and the Trunkline Backhaul Project that were filed with the Federal Energy Regulatory Commission in FERC Docket Nos. CP15-93-000, CP15-93-001, CP15-94-000, and CP15-96-000, respectively, that he is authorized to make this Affirmative Statement, deposes and states that all company personnel, environmental inspectors, and contractor personnel for these projects described above will be informed of the Environmental Inspector's authority and have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.



Mr. Joey Mahmoud,  
Executive Vice President, Engineering and Construction  
Rover Pipeline LLC  
Panhandle Eastern Pipe Line Company, LP  
Trunkline Gas Company, LLC

Subscribed and sworn to before me this 3 rd day  
of February 2017.

Name: Lennice Dawson  
Title: Notary Public in the State of Texas



4. *The authorized facility locations shall be as shown in the EIS, as supplemented by filed alignment sheets. As soon as they are available, and before the start of construction, the applicants shall file any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for all facilities approved by the Order. All requests for modifications of environmental conditions of the Order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.*

*Rover's exercise of eminent domain authority granted under NGA Section 7(h) in any condemnation proceedings related to the Order must be consistent with these authorized facilities and locations. Rover's right of eminent domain granted under NGA Section 7(h) does not authorize it to increase the size of its natural gas pipeline to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.*

**Response:**

Rover agrees to comply with the above listed requirements and the "Issued for Construction" (IFC) alignment sheets attached as Enclosure 4a and IFC site plans for the proposed facilities attached as Enclosure 4b filed under CEII. Project tables have been updated, including revised mileposts, and are included as Enclosure 4c. Detailed road crossing typical figures as submitted to the state and local agencies are included as Enclosure 4d, which have not previously been filed with FERC. Any future modifications to environmental conditions of the Order or site-specific clearances will reference the locations designated on the IFC alignment sheets.

Rover understands that its exercise of eminent domain authority granted under NGA Section 7(h) in any condemnation proceedings related to the Order must be consistent with the authorized facilities and locations. Rover further acknowledges that its right of eminent domain granted under the Natural Gas Act (NGA) Section 7(h) does not authorize it to increase the size of its natural gas pipeline to accommodate future needs or acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

5. *Each applicant 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 Rover's 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 currently requesting approval for the proposed workspace modifications and minor reroutes as listed in Table 5-1 below and shown on the comparison drawings in Enclosure 5a. Tables 5-2 through 5-9 below provide comparison information on each of the reroutes. Pertinent environmental information on land use changes resulting from workspace modifications are listed in Table 5-1.

All requested modifications have been surveyed for biological and cultural resources. No cultural or endangered/threatened species or other environmentally sensitive areas were found. No new landowners will be affected. A revised Residential Implementation Plan is included in Enclosure 5b for the workspace modification at Burgettstown Lateral milepost 19.75.

In addition, Rover has shifted the location of the proposed driveway to Compressor Station 1 as requested by the Carroll County Engineers Office to improve vision on the top of the hill for safety reasons. The revised site plan is included in Enclosure 4b filed under CEII, and a revised Visual Screening Plan for Compressor Station 1 is included as Enclosure 38.

Rover has also reversed the direction of the Horizontal Directional Drill (HDD) of the Black Fork Mohican River at MP 95.59 on Mainlines A and B to accommodate a bald eagle nest in the vicinity. In consultation with the U.S. Fish and Wildlife Service (USFWS), it was determined that placing the drilling equipment further from the nest would avoid any impacts to the nest. The revised HDD profile figure is included as Enclosure 4a. Correspondence with the USFWS is included in Enclosure 6a.

The impacts associated with each of these changes are included in the updated environmental resource tables provided in Enclosure 4c and in the alignment sheets in Enclosure 4a.

At this time, Rover is postponing construction of the Consumers Meter Station along the Market Segment in Michigan. Rover will notify FERC when construction is scheduled.



Rover requests the use of 28 contractor yards as depicted in Table 5-10 below. Topographic and aerial-based maps are included in Enclosure 5c. All requested contractor yards have been surveyed for biological and cultural resources. No cultural or endangered/threatened species or other environmentally sensitive areas were found. No wetland or waterbodies will be affected by the use of the contractor yards. Clearances have been obtained from the USFWS and state historic preservation offices (SHPOs) for each respective state. Table 5-10 below includes the dates clearances were received, and copies are included in Enclosure 5d.

**TABLE 5-1**  
**Summary of Route/Workspace Modifications**

MP	County, State	Comparison Dwg. Number(s) / Table No.	Summary of Change	Stream/Wetland Effects	Maximum Distance/Direction from Original Route	Length (ft) of Reroute
<b>Burgettstown Lateral</b>						
19.75	Jefferson, OH	BG-P3-1022-C	Relocate temporary workspace & ATWS (15 ft x 115 ft) to abut west side of State Route 113.	Shifts 0.04 acre of open land. No wetlands/streams affected. Residence is along northern edge of relocated workspace. Rover has acquired the tract in fee. Alignment sheet includes previously submitted elimination of workspace at MP 20.16.	-	-
<b>Clarington Lateral</b>						
2.74	Belmont, OH	CL-P3-1004-C	Relocate temporary workspace (approximately 500 ft x 50 feet) from north to south side of construction right-of-way.	No wetlands/streams affected. Shifts workspace from open land on north to open land on south.	-	-
18.37	Belmont, OH	CL-P3-1021-C	Eliminate temporary workspace (<0.1 acre) along Blue Racer Midstream pipeline.	No wetlands/streams affected. Eliminates <0.1 acre of open land.	-	-
21.96	Belmont, OH	CL-P3-1025-C	Eliminate temporary workspace (<0.01 acre) over existing pipelines in two locations.	No wetlands/streams affected. Eliminates <0.1 acre of open land.	-	-
<b>Seneca Lateral</b>						
0.0	Noble, OH	SN-P3-1001-C	Add tract to Seneca Compressor Station Site.	No wetlands/streams affected.	-	-
<b>Sherwood Lateral</b>						



**TABLE 5-1**  
**Summary of Route/Workspace Modifications**

MP	County, State	Comparison Dwg. Number(s) / Table No.	Summary of Change	Stream/Wetland Effects	Maximum Distance/Direction from Original Route	Length (ft) of Reroute
30.44	Tyler, WV	SW-P3-1032-C Table 5-2	Reroute to avoid a septic system.	No wetlands/streams affected.	195 feet south	580
<b>Supply Connector &amp; Mainline A and B</b>						
15.58	Harrison, OH	ML-P3-1017-C	Add 115 ft x 155 ft ATWS for crossing of multiple pipelines.	Add approximately 0.37 acre of open land.	-	-
16.66	Harrison, OH	ML- P3-1019-C	Eliminate 80 ft x 140 ft and add 50 ft x 140 ft of ATWS for HDD entry/exit to avoid placement on Marathon pipeline.	No wetlands/streams affected. Shifts approximately 0.02 acre of open land to forest.	-	-
22.44	Carroll, Tuscarawas, OH	ML- P3-2004-C	Adjust temporary workspace to eliminate placement over proposed Marathon pipeline.	No wetlands/streams affected.	-	-
72.5	Wayne, OH	ML- P3-3034-C Table 5-3	Adjust alignment so TWS is outside boundaries of existing well site.	No wetlands/streams affected. Shifts alignment in agricultural field.	45 feet north	1,195
74.14	Wayne, OH	ML- P3-3035-C, ML- P3-3036-C Table 5-4	Adjust alignment to meet Columbia Transmission separation of 200 feet.	Shift crossing of intermittent Stream S4H-WA-184.	146 feet north	1,200
89.27	Ashland, OH	ML- P3-4012-C, ML- P3-4013-C Table 5-5	Adjust alignment to meet Columbia Transmission separation of 200 feet.	No streams or wetlands affected.	72 feet south	2,457
90.22	Ashland, OH	ML- P3-4013-C ML- P3-4014-C Table 5-6	Adjust alignment to meet Columbia Transmission separation of 200 feet.	Shift crossing of perennial Stream S3H-AS-106.	77 feet north	1,012

**TABLE 5-1**  
**Summary of Route/Workspace Modifications**

MP	County, State	Comparison Dwg. Number(s) / Table No.	Summary of Change	Stream/Wetland Effects	Maximum Distance/Direction from Original Route	Length (ft) of Reroute
206.65	Defiance, OH	ML- P3-6037-C, ML- P3-6038-C Table 5-7	Reroute to avoid parcel that has been systematically tiled and abut Rover easement.	Shift crossing of intermittent Stream S8H-DE-105 and ephemeral roadside Ditch D5H-DE-100. Reroute entirely within agricultural field.	500 feet west	4,475
<b>Market Segment</b>						
67.25	Washtenaw, MI	MK-P3-8012-C MK-P3-8013-C Table 5-8	Reroute centerline to avoid center of tract where landowner has plans for future gravel/sand pit.	Eliminate crossings of Wetland W2K-WA-199 (PEM), W5K-WA-264 (PEM), W2K-WA-198 (PSS), W5K-WA-287 (PEM). Add crossings of Wetland W1K-WA-278 (PEM), W5K-WA-479 (PSS), W5K-WA-475 (PEM), W5K-WA-473 (PEM), and natural pond WB5K-WA-474.	1,141 feet east	4,988
90.05	Livingston, MI	MK-P3-8038-C	Eliminate temporary workspace adjacent to shed.	No wetlands/streams affected. Eliminate 0.03 acre of open land.	-	-
91.79	Livingston, MI	MK-P3-8038-C MK-P3-8039-C Table 5-9	Adjust alignment to avoid work space in front yard on home.	Shift crossings of Wetland W5K-LI-127 (PEM) and manmade pond WB5K-LI-128.	20 feet west	390

**TABLE 5-2  
Comparison of the Sherwood Lateral (Sept. 2016) and Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Sherwood Lateral - MP 30.4 to 30.6		Variance <sup>1</sup>
		Sherwood Lateral Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.12	0.11	-0.01
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	2.18	1.98	-0.20
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.09	0.20	0.11
Agricultural land	acres	2.03	1.72	-0.31
Open land	acres	0.06	0.06	0.00
Permanent right-of-way	acres	0.74	0.69	-0.05
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	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	2	2	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-3**  
**Comparison of the Mainlines A and B (Sept. 2016) and**  
**Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Mainlines A/B - MP 72.5 to 72.7		Variance <sup>1</sup>
		Mainlines A/B Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.23	0.23	0.00
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	4.15	3.61	-0.54
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.00	0.00	0.00
Agricultural land	acres	4.15	3.61	-0.54
Open land	acres	0.00	0.00	0.00
Permanent right-of-way	acres	1.66	1.67	0.01
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	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	1	1	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-4**  
**Comparison of the Mainlines A and B (Sept. 2016) and**  
**Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Mainlines A/B - MP 74.1 to 74.48		Variance <sup>1</sup>
		Mainlines A/B Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	1550.00	1580.00	30.00
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	5.29	5.31	0.02
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	1.03	0.96	-0.07
Agricultural land	acres	4.26	4.35	0.09
Open land	acres	0.00	0.00	0.00
Permanent right-of-way	acres	2.04	2.18	0.14
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	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	2	2	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-5  
Comparison of the Mainlines A and B (Sept. 2016) and  
Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Mainlines A/B - MP 89.3 to 89.8		Variance <sup>1</sup>
		Mainlines A/B Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.77	0.77	0.00
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	3.63	3.54	-0.09
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.77	1.02	0.25
Agricultural land	acres	2.86	2.52	-0.34
Open land	acres	0.00	0.00	0.00
Permanent right-of-way	acres	1.44	1.39	-0.05
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	0
NRHP Listed Properties within 500 feet	number	0	0	0
Roads crossed	number	1	1	0
Railroads crossed	number	0	0	0
Tracts crossed	number	3	3	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-6**  
**Comparison of the Mainlines A and B (Sept. 2016) and**  
**Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Mainlines A/B - MP 90.2 to 90.4		Variance <sup>1</sup>
		Mainlines A/B Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.20	0.20	0.00
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	3.49	3.54	0.05
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.72	0.87	0.15
Agricultural land	acres	2.77	2.67	-0.10
Open land	acres	0.00	0.00	0.00
Permanent right-of-way	acres	1.49	1.45	-0.04
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	1	1	0
Railroads crossed	number	0	0	0
Tracts crossed	number	1	1	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-7  
Comparison of the Mainline A (Sept. 2016) and Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Mainline A - MP 206.6 to 207.5		Variance <sup>1</sup>
		Mainline A Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.86	0.91	0.05
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	15.52	12.53	-2.99
Emergent wetlands	acres	0.00	0.00	0.00
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.00	0.00	0.00
Agricultural land	acres	15.19	12.36	-2.83
Open land	acres	0.33	0.17	-0.16
Permanent right-of-way	acres	5.22	5.53	0.31
Intermittent streams crossed	number	1	1	0
Perennial streams crossed	number	0	0	0
NRHP Listed Properties within 500 feet	number	0	0	0
Roads crossed	number	1	1	0
Railroads crossed	number	0	0	0
Tracts crossed	number	5	4	-1
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).



**TABLE 5-8  
Comparison of the Market Segment (Sept. 2016) and Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Market Segment - MP 67.2 to 68.1		Variance <sup>1</sup>
		Market Segment Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.82	0.95	0.13
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	13.71	15.38	1.68
Emergent wetlands	acres	0.34	0.29	-0.05
Scrub-shrub wetlands	acres	0.20	0.10	-0.10
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	2.13	4.47	2.34
Agricultural land	acres	9.48	9.20	-0.28
Open land	acres	2.09	1.71	-0.38
Permanent right-of-way	acres	4.97	5.76	0.79
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	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	4	4	0
Residences within 50 feet of the centerline	number	0	1	1
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**TABLE 5-9  
Comparison of the Market Segment Lateral (Sept. 2016) and Proposed Reroute (Dec. 2016)**

Environmental Factor	Unit	Market Segment - MP 91.8 to 91.9		Variance <sup>1</sup>
		Market Segment Sept. 2016	Proposed Route (Dec. 2016)	
Total length:	miles	0.07	0.07	0.00
Length adjacent to existing rights-of-way	miles	0.00	0.00	0.00
Total construction right-of-way	acres	0.91	0.90	0.00
Emergent wetlands	acres	0.21	0.28	0.07
Scrub-shrub wetlands	acres	0.00	0.00	0.00
Forested wetlands	acres	0.00	0.00	0.00
Forest	acres	0.86	0.89	0.03
Agricultural land	acres	0.04	0.01	-0.03
Open land	acres	0.00	0.00	0.00
Permanent right-of-way	acres	0.45	0.45	0.00
Intermittent streams crossed	number	0	0	0
Perennial streams crossed	number	0	0	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	1	1	0
Residences within 50 feet of the centerline	number	0	0	0
NSAs (e.g., schools, hospitals) within 500 feet	number	0	0	0
Public lands crossed	miles	0.00	0.00	0.00

<sup>1</sup> Variance calculated by subtracting Sept. 2016 route from Proposed Route (Dec. 2016).

**Table 5-10. Proposed Rover Contractor Yards in Michigan, Ohio, Pennsylvania, and West Virginia**

Yard Name	County, State	Acres	Comments	SHPO - Section 106		USFWS - Section 7	
				Submittal Date	Clearance Date	Submittal Date	Clearance Date
<b>Pennsylvania</b>							
Burgettstown Main Contractor Yard 2	Washington, PA	26.8	Previously occupied by Miller Airport. No streams or wetlands on site.	12/2/2016	12/22/2016	12/6/2016	12/14/2016
<b>West Virginia</b>							
Sherwood Equipment Yard Central	Doddridge, WV	4.59	Past use as work yard and mostly graveled. No wetlands or streams on site.	12/2/2016	12/20/2016	12/6/2016	1/24/1027
Sherwood Main Contractor Yard East	Harrison, WV	18.24	Not currently in use. Past use as a material and equipment yard, and graveled. Three emergent wetlands (W3H-HA-292 - 0.04 acre, W3H-HA-293 - 0.02 acre, W3H-HA-294 - 0.0001 acre) on site. See Note 1.	12/2/2016	12/20/2016	12/6/2016	1/24/1027
Majorsville Main Contractor Yard	Marshall, WV	10.49	Currently in use as a scrapyard and for material and equipment storage. One emergent wetland (W3H-MA-295 - 0.01 acre) on site. See Note 1.	12/2/2016	12/20/2016	12/6/2016	1/24/1027
<b>Ohio</b>							
Spread B Equipment Yard (Ashland Yard)	Ashland, OH	21.3	Included in the DEIS/FEIS as the Ashland Yard. No streams or wetlands on site.	<b>FEIS See Note 2</b>	<b>FEIS See Note 2</b>	FEIS July 2016	FWS Sept. 2016
Clarington Equipment Yard	Belmont, OH	9.9	Eastern portion in use for agriculture; western portion is graveled and has been used as a contractor yard. One emergent wetland (W2H-BE-251 - 0.02 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Clarington Equipment Yard 2	Belmont, OH	43.95	Reclaimed strip mining area containing gravel lots and storage buildings. Two small emergent wetlands (W3H-BE-296 - 0.03 acre, W3H-BE-297 - 0.15 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Clarington Main Contractor Yard	Belmont, OH	25.05	Current and past use for storage of aggregates and construction debris. Three small emergent wetlands	12/2/2016	1/18/2017	12/6/2016	1/9/2017

Yard Name	County, State	Acres	Comments	SHPO - Section 106		USFWS - Section 7	
				Submittal Date	Clearance Date	Submittal Date	Clearance Date
			(W6H-BE-121 - 0.04 acre, W6H-BE-122 - 0.03 acre, W6H-BE-123 - 0.05 acre) on site. See Note 1.				
Clarington St. Clairsville Contractor Yard	Belmont, OH	16.1	Currently in use as a temporary RV park, as well as heavy equipment and aggregated/fill storage. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016 1/30/16	1/9/2017 <b>See Note 3</b>
Spread 1 Equipment Yard 3	Carroll, OH	1.82	Currently in use as construction yard. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread D Equipment Yard 1	Defiance, OH	3.35	Property contains remnant foundations, currently covered in grass. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread 7 Equipment Yard	Fulton, OH	8.59	Past use as storage and equipment yard. Two emergent wetlands (W3H-FU-285 - 0.37 acre, W3H-FU-286 - 0.17 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Cadiz West Contractor Yard	Harrison, OH	49.4	Three small emergent wetlands (W3H-HA-311 - 0.03 acre, W3H-HA-314 - 0.3 acre, W3H-HA-315 - 0.3 acre), one ephemeral stream (S3H-HA-313), and one man-made pond (WB3H-HA-312) on site. See Note 1.	1/9/2016	1/24/2017	1/20/2016	1/26/2017
Spread 1 Equipment Yard 1	Harrison, OH	4.71	Past used as storage area with gravel lot and metal buildings on site. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread 1 Equipment Yard 2	Harrison, OH	9.43	Property has been in use as an equipment storage area beginning in 2015. One emergent wetland (W3H-HA-307 - 0.04 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
BGL Wintersville Main Contractor Yard South	Jefferson, OH	18.65	Past use as material and equipment storage area. No wetlands or streams on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Seneca Equipment Yard Option 2	Monroe, OH	7.4	Agricultural area. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Sherwood Main Contractor Yard West	Monroe, OH	29	Currently in use as part of industrial park, containing parking lots, pipe storage area, and landscaped lawn. No wetlands or streams on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017

Yard Name	County, State	Acres	Comments	SHPO - Section 106		USFWS - Section 7	
				Submittal Date	Clearance Date	Submittal Date	Clearance Date
Spread C Main Contractor Yard	Richland, OH	55.29	Past use for light industrial purposes and is currently leveled and graded. One manmade pond (WB3H-RI-274), two ephemeral streams (S3H-RI-275, S3H-RI-276), and one scrub-shrub wetland (W3H-RI-277 - 0.06 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread A Equipment Yard 2	Stark, OH	22.4	Currently grassed but has been in use as storage and laydown area for industrial park. Two manmade ponds (WB3H-ST-287, WB3H-ST-288), two perennial streams (S3H-ST-289, S3H-ST-291), and two scrub-shrub wetlands (W3H-ST-290 - 0.09 acre, W3H-ST-290A - 0.04 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread A Main Contractor Yard	Stark, OH	18.85	Currently grassed but has been recently in use for equipment storage and material laydown. No streams or wetlands on site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread 1 Main Contractor Yard 1	Tuscarawas, OH	17.53	Includes areas used for automotive scrap, parking lot, and fallow agricultural field. One intermittent stream (SH3-TU-301) and one emergent wetland (W3H-TU-298 - 0.06 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread 1 Main Contractor Yard 1 Option 3	Tuscarawas, OH	7.89	Past use for railroad infrastructure, and material and equipment storage. One emergent wetland (W3H-TU-308 - 0.07 acre) on site. See Note 1.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread 1 Main Contractor Yard 1 Option 4A & 4B	Tuscarawas, OH	11	In use as a contractor yard with some portions graveled and some portions in grass. No streams or wetlands on site.	12/2/2016 1/28/17	1/18/17 <b>See Note 4</b>	12/6/2016 1/25/2017	1/9/2017 <b>See Note 5</b>
Spread A Equipment Yard 1 (Dennison Yard)	Tuscarawas, OH	58.7	Included in the FEIS as the Dennison Yard. Added 6 acres at the southern end of the previously approved yard. Two emergent wetlands (W4H-HR-422 - 12.06 acre, W2H-TU-249 - 0.35 acre) and one intermittent stream (S4H-HR-423) on site. See Note 1.	FEIS 12/2/2016	FEIS 1/18/2017	FEIS 12/6/2016	FEIS 1/9/2017
Spread B Main Contractor Yard	Wayne, OH	6.06	Large open lot currently covered in gravel and fenced. One man-made pond (WB2H-WA-250) just south of site.	12/2/2016	1/18/2017	12/6/2016	1/9/2017
Spread D Main Contractor Yard	Wood, OH	38.61	Used as a quarry and for storage of equipment, storage facilities, and materials. Two emergent wetlands (W3H-	12/2/2016	1/18/2017	12/6/2016	1/9/2017

				SHPO - Section 106		USFWS - Section 7	
Yard Name	County, State	Acres	Comments	Submittal Date	Clearance Date	Submittal Date	Clearance Date
			WO-279 - 0.49 acre, W3H-WO-280 - 0.15 acre) on site. See Note 1.				
<b>Michigan</b>							
Spread 7 Main Contractor Yard	Lenawee, MI	24.6	Two perennial streams (S3H-LE-282, S3H-LE-283), two scrub-shrub wetlands (W3H-LE-284 - 0.05 acre, W3H-LE-284A - 0.01 acre), and one man-made pond (WB3H-LE-281) on site. See Note 1.	12/8/2016	1/17/2017	12/6/2016	1/11/2017
Spread 8 Main Contractor Yard (Whitmore Yard)	Livingston, MI	15.5	Included in the DEIS/FEIS as the Whitmore Yard. One man-made pond (WB1M-LI-239) on site. See Note 1.	FEIS <b>See Note 6</b>	FEIS <b>See Note 6</b>	FEIS July 2016	FWS Sept. 2016
<p>Note 1. A 10-foot buffer will be established around each stream, wetland, or pond and these features will be protected from construction activities.</p> <p>Note 2. The Spread B Equipment Yard (Ashland Yard) was surveyed for cultural resources in November 2014 and no cultural resources were found. However, the yard was not specifically referenced in the initial survey report or addenda. Rover is resubmitting the documentation on this yard to the Ohio SHPO and will provide copies of that documentation and SHPO comments prior to requesting permission to use this contractor yard.</p> <p>Note 3. The documentation sent to USFWS on December 6, 2016 for the Clarington St. Clairsville Contractor Yard only included the southern portion of this yard. On January 30, 2017, a request was sent to clear the northern portion. Rover will provide a copy of USFWS comments on this second submittal prior to requesting permission to use the northern portion of this yard.</p> <p>Note 4. Ohio SHPO commented that the Spread 1 Main Contractor Yard 1 Option 4A &amp; 4B yard is near the Pennsylvania Railroad Depot Historic Property and requested limited use of this yard. On January 28, 2016, Rover submitted additional documentation to support its request that use of the entire yard would have no substantial or long term visual or audial impacts for visitors at the historic Depot. Rover will provide a copy of SHPO comments on this second submittal prior to requesting permission to use this contractor yard.</p> <p>Note 5. The documentation sent to USFWS on December 6, 2016 for the Spread 1 Main Contractor Yard 1 Option 4A &amp; 4B yard inadvertently omitted the southern Option 4B part of the yard. On January 25, 2017, a request was sent to clear Option 4B. Rover will provide a copy of USFWS comments on this second submittal prior to requesting permission to use the northern portion of this yard.</p> <p>Note 6. The Spread 8 Main Contractor Yard (Whitmore Yard) was surveyed for cultural resources in October 2014 and no cultural resources were found. However, the yard was not specifically referenced in the initial survey report or addenda. Rover is resubmitting the documentation on this yard to the Michigan SHPO, and will provide copies of that documentation and SHPO comments prior to requesting permission to use this contractor yard.</p>							

6. *Within 60 days of the acceptance of the Certificate and before construction begins, each applicant shall file its respective Implementation Plan for review and written approval by the Director of OEP. Each applicant must file revisions to its plan as schedules change. The plans must identify:*

- a. *how the applicants will implement the construction procedures and mitigation measures described in its application and supplements (including responses to staff data requests), identified in the EIS, and required by the Order;*
- b. *how the applicants will incorporate these requirements into the contract bid documents, construction contracts (especially penalty clauses and specifications), and construction drawings so that the mitigation required at each site is clear to onsite construction and inspection personnel;*
- c. *the number of EIs assigned, and how the company will ensure that sufficient personnel are available to implement the environmental mitigation;*
- d. *company personnel, including EIs and contractors, who will receive copies of the appropriate material;*
- e. *the location and dates of the environmental compliance training and instructions the applicants will give to all personnel involved with construction and restoration (initial and refresher training as the Projects progress and personnel change) with the opportunity for OEP staff to participate in the training sessions;*
- f. *the company personnel (if known) and specific portion of the applicant's organization having responsibility for compliance;*
- g. *the procedures (including use of contract penalties) the applicants will follow if noncompliance occurs; and*
- h. *for each discrete facility, a Gantt or PERT chart (or similar project scheduling diagram), and dates for:*
  - i. *the completion of all required surveys and reports;*
  - ii. *the environmental compliance training of onsite personnel;*
  - iii. *the start of construction; and*
  - iv. *the start and completion of restoration.*

**Response:**

This Implementation Plan is being submitted to the Secretary for review and approval by the Director of OEP. It describes how Rover, Panhandle Eastern Pipe Line Company (PEPL) and Trunkline Gas Company (TGC) will implement the procedures and mitigation measures described in the Project application, the EIS, the environmental conditions appended to the Order, and the applicable measures identified by permitting agencies required by the Commission's Order in this proceeding.

Please note that Rover has revised the construction spread breaks previously identified along Mainlines A and B as shown below. The alignment sheet sets will remain divided as previously issued for drawing number consistency.

Mainlines A and B

Spread A: MPs 18.67 – 53.51 (34.78 miles)  
Spread B: MPs 53.51 – 95.97 (42.46 miles)  
Spread C: MPs 95.97 – 151.69 (55.71 miles)  
Spread D: MPs 151.69 – 209.60 (57.96 miles)

The following specifically addresses the eight conditions in Environmental Condition No. 6 (i.e., 6.a through 6.h).

- a. Rover, PEPL, and TGC have included the applicable required construction procedures and mitigation measures into the bid documents issued for all construction and inspection work. These construction procedures and mitigation measures, including permit requirements, construction drawings, and other specifications, were part of the contract documents when the construction and inspection contracts were awarded. Site-specific mitigation measures are included on the applicable bid construction drawings and will be presented to all personnel involved with construction and at the mandatory environmental training sessions. A copy of the appropriate contract documents will be kept at the Rover main field office in North Canton, Ohio, on-site at each compressor station for the PEPL/TGC Backhaul throughout the duration of all construction activities. The contract documents note that Rover, PEPL, and TGC and their contractor(s) are obligated by FERC to execute their activities in adherence to the Commission's rules, regulations, policies, EIS, and certificate conditions.

If, during the course of the construction work, any work does not conform to the provisions of the contract documents, the construction contractor is required to make the necessary corrections so that such work will conform to the required mitigation measures identified in the contract documents. If the construction contractor is unable or unwilling to make the necessary corrections, Rover, PEPL, and TGC retain the right to terminate the contract with the construction contractor and award the work to an acceptable replacement contractor.

- b. The contract bid documents allows Rover, PEPL, and TGC to manage its contractors in accordance with all FERC procedures and measures set forth in the EIS and required by the Order. For example, under the contract documents, the contractor(s) is not permitted to deviate from the proposed construction work area before requesting and obtaining, in writing, the appropriate variance. The contractor(s) is further explicitly obligated under the contract documents to pay a penalty for each unauthorized deviation from the construction work area, as determined in Rover's, PEPL's, or TGC's sole discretion. The penalty payment provisions do not apply to necessary deviations from the construction work area as may be required by contractor(s) for emergency or exigent circumstances to prevent or limit damage or harm to off-right-of-way property. The intention of the contract bid documents is that the penalty clause be used to address repeated, habitual, or willful deviations from the construction work areas. Inadvertent or accidental deviations from the construction work area will be addressed and corrected by their respective field personnel on a timely basis.

Furthermore, the contract bid documents acknowledge that in the event the contractor(s), its agents, subcontractors, vendors, or representatives deviate from the proposed construction work area, Rover, PEPL, and TGC may be penalized by FERC by, among other things, civil penalty, suspension of the Project, or revocation or modification of its Order. The cost and expenses of all such penalties, suspension, or revocation or modification are explicitly borne by the contractor(s) under Rover's, PEPL's, or TGC's bid documents.

As a last resort, the contract bid documents reserve Rover's, PEPL's, and TGC's right to terminate a construction contract should repetitive or willful violations of FERC rules, regulations or policies occur. The contractual language gives Rover, PEPL, and TGC substantial oversight of its contractor(s) (with applicable penalties and compliance/specifications clauses) in managing the Project in accordance with the construction procedures and mitigation measures described in the application, any supplements, and as required by the Commission's Order.





Rover, PEPL, and TGC will ensure that all mitigation conditions required by the Order are incorporated into the construction documents and that these requirements are clear to both the construction and inspection personnel. Rover, PEPL, and TGC are preparing an Environmental Requirements Document (ERD) that includes all permits and clearances issued for Project, and identifies the environmental requirements and commitments associated with the Project and special environmental construction procedures and mitigation measures for each construction spread. Copies of the ERD will be in the field for use by the Environmental Inspectors (EI) and other construction personnel at each spread.

Prior to commencing construction, Rover, PEPL, and TGC will conduct environmental training for all contractor supervisory personnel, including EIs and construction foremen. Prior to and throughout construction, the EIs and construction foremen will conduct environmental and safety training for individuals and crews as they report for work at the Project site. During environmental training, site-specific requirements and mitigations will be presented to on-site construction and inspection personnel. As applicable, follow-up refresher training will be held throughout the construction phase to reiterate certain requirements, if warranted, to specific work crew(s) to ensure that the mitigation required at each site is clear to on-site construction and inspection personnel.

For mitigation measures that address post-construction operation and maintenance requirements, Rover's, PEPL's, and TGC's engineering and environmental staff will provide pertinent instructions and documentation to Rover's, PEPL's, and TGC's operating personnel for use in on-going operations and maintenance activities. This information will include copies of relevant environmental permits that specifically address long-term conditions.

- c. Rover will employ the following Environmental Inspection Team to implement environmental inspection:
- one (1) Environmental Project Manager,
  - one (1) Chief EI,
  - one (1) Lead EI per spread,
  - one (1) EI per spread, and
  - one (1) Agricultural Inspector (AI) per spread on Mainline Spreads A-D, and Market Segment Spread 7.

Rover will also employ a Biologist and an Archaeologist who will assist the EIs as needed to insure coverage of construction activities and implementation of the applicable environmental mitigation measures. The Chief EI will report directly to the Environmental Project Manager, based in the Rover Houston office. Rover will increase staff as needed during the course of construction if Rover determines that additional environmental crew personnel or additional EIs or AIs are needed to implement the environmental mitigation.

In addition, Rover will implement the FERC's third-party independent Compliance Monitoring Program that will involve the use of full-time third-party compliance monitors (FERC Compliance Team), representing the Commission, during construction. These monitors will provide daily feedback on compliance issues to the FERC staff and will document the progress of construction in reports submitted to the FERC staff on a regular basis, as well as assist the FERC staff in the screening and processing of variance requests.



PEPL and TGC will employ the following Environmental Inspection Team to implement environmental inspection:

- one (1) Environmental Project Manager,
- one (1) Chief EI for TGC/PEPL,
- one (1) Lead EI for PEPL, and
- one (1) Lead EI for TGC.

PEPL and TGC will also retain a Biologist and an Archaeologist who can assist the EIs as needed to insure coverage of construction activities and implementation of the applicable environmental mitigation measures. The Chief EI will report directly to the Environmental Project Manager, based in the PEPL/TGC Houston office.

- d. At a minimum, the ERD and IFC alignment sheets will be provided to the following personnel:

Rover Environmental Inspection Team

Environmental Project Manager  
Chief EI  
Lead EIs  
EIs  
AIs  
Database Manager

Rover Construction Management Team

Project Director  
Project Manager  
Project Construction Manager  
Assistant Construction Manager  
Safety Coordinator  
Safety Inspectors  
Chief Inspectors  
Assistant Chief Inspectors  
Senior Welding Inspectors  
Utility/Welding Inspectors  
Key Right-of-Way Land Agents

Rover Contractors

Spread Superintendents  
Spread Foremen  
Spread Environmental Coordinator  
Environmental Foremen  
Key Right-of-Way Land Agents

FERC Compliance Monitoring Team (for Rover)

FERC Compliance Manager  
Compliance Monitors



Rover Environmental Inspection Team

Environmental Project Manager  
Chief EI  
Lead EIs  
EIs  
Database Manager

TGC Backhaul Construction Management Team

Project Director  
Project Manager  
Project Construction Manager  
Assistant Construction Manager  
Safety Coordinator  
Safety Inspectors  
Chief Inspectors  
Welding Inspectors (CWI)  
Utility Inspectors/Welding Inspectors  
Electrical Inspectors

TGC Contractors

Superintendents  
Foremen  
Environmental Coordinator  
Environmental Foremen

TGC Contractors

Superintendents  
Foremen  
Environmental Coordinator  
Environmental Foremen  
Right-of-Way Land Agent

PEPL Backhaul Construction Management Team

Project Director  
Project Manager  
Project Construction Manager  
Safety Coordinator  
Safety Inspectors  
Chief Inspectors  
Welding Inspectors (CWI)  
Utility Inspectors  
Electrical Inspectors

PEPL Contractors

Superintendents  
Foremen  
Environmental Coordinator  
Environmental Foremen



PEPL/TGC Backhaul Environmental Inspection Team

Environmental Project Manager  
Chief EI for TGC/PEPL  
Lead EI for TGC  
Lead EI for PEPL

- e. Supervisory Training for Rover will be held at an appropriate venue in the Project area, approximately one week prior to the start of field construction activities. The FERC staff and Compliance Monitoring Team, and agency representatives, will be invited to attend. Rover will provide exact dates when they become available. The following Rover, contractor, and inspection personnel will be invited to participate in the supervisory training:

Rover Environmental Inspection Team

Environmental Project Manager  
Chief EI  
Lead EIs  
EIs  
AIs

Rover Construction Management Team

Project Director  
Project Manager  
Project Construction Manager  
Assistant Construction Manager  
Safety Coordinator  
Safety Inspectors  
Chief Inspectors  
Assistant Chief Inspectors  
Senior Welding Inspectors  
Utility/Welding Inspectors  
Key Right-of-Way Land Agents  
Spread Superintendents (contractor)  
Spread Foremen (contractor)  
Spread Environmental Coordinator (contractor)  
Environmental Foremen (contractor)  
Key Right-of-Way Land Agents (contractor)

FERC Compliance Management Team (for Rover)

FERC Compliance Manager  
Compliance Monitors

Other Federal and State Regulatory Agency representatives, as appropriate

The Supervisory Training will ensure a consistent approach to implementing the Rover Upland Erosion Control, Revegetation and Maintenance Plan (Rover Plan) and Waterbody and Wetland Construction and Mitigation Procedures (Rover Procedures), and other Project-specific plans. Additional Supervisor Training sessions, refresher training, tailgate training, or additional training focused on specific environmental issues will be conducted as needed as new phases of



construction begin, and throughout construction. Training may be tailored as applicable to each labor group's duties.

On-site Project personnel, including all Rover and contractor personnel, will be required to attend an environmental training session (Crew Training) before being allowed to begin work on the Project in the field. All trained personnel will be issued a hardhat decal, documenting completed environmental training, which must be worn while working on the Project. No person will be allowed onto the construction right-of-way without proper documentation of having attended and completed environmental training. The Crew Training will include environmental and crew safety. Environmental training sessions will be conducted prior to the start of construction and as often as needed throughout construction, as new personnel arrive on the Project site.

In summary, Rover will conduct a comprehensive environmental training program, which will include the following training programs:

- Supervisory Staff Training;
- Crew Training; and
- Specialized Training (e.g., for construction activities at compressor stations, contractor yards, residential areas, HDDs, etc.).

Supervisory Training for PEPL/TCG will be held at an appropriate venue in each Project area, approximately one week prior to the start of construction. The following PEPL and TGC contractor, and inspection personnel will be invited to participate in the supervisory training:

PEPL/TGC Backhaul Environmental Inspection Team

Environmental Project Manager  
Chief EI  
Lead EIs

PEPL/TGC Backhaul Construction Management Team

Project Director  
Project Manager  
Project Construction Manager  
Safety Coordinator  
Safety Inspectors  
Chief Inspectors  
Welding Inspectors (CWI)  
Utility Inspectors  
Electrical Inspectors  
Key Right-of-Way Land Agents  
Superintendents (contractor)  
Foremen (contractor)  
Site Environmental Coordinator (contractor)  
Environmental Foremen (contractor)  
Key Right-of-Way Land Agents (contractor)

Other Federal and State Regulatory Agency representatives, as appropriate



The Supervisory Training will ensure a consistent approach to implementing the FERC Upland Erosion Control, Revegetation and Maintenance Plan (Plan) and Waterbody and Wetland Construction and Mitigation Procedures (Procedures), and other Project-specific plans. Refresher training, tailgate training, or additional training focused on specific environmental issues will be conducted periodically, as needed during construction. Training may be tailored as applicable to each labor group's duties.

On-site Project personnel, including all PEPL, TGC and contractor personnel, will be required to attend an environmental training session (Crew Training) before being allowed to begin work on the Project in the field. All trained personnel will be issued a hardhat decal, documenting completed environmental training, which must be worn while working on the Project. No person will be allowed onto the construction right-of-way without proper documentation of having attended and completed environmental training. The Crew Training will include environmental and crew safety. Environmental training sessions will be conducted prior to the start of construction and as often as needed throughout construction, as new personnel arrive on the Project site.

In summary, PEPL/TGC Backhaul will conduct a comprehensive environmental training program, which will include Supervisory Staff Training and Crew Training.

- f. Key Rover personnel having responsibility for environmental compliance on the Project will be:

Executive Vice President & Corporate Principal – Joey Mahmoud

Project Director – Leon Banta

Project Manager – Seth Willoughby

Project Construction Manager – Stacy McCurdy

Assistant Construction Manager – Ron Shafer

Environmental Project Manager – Buffy Thomason

Chief EI – Tim Presley

Lead EIs – Peter Danley, Jeff Spencer, Heath Benard, Tom Gunter, Steve Jay, Nick Reed, Cody Gavranovic, David Buckley, Brandon Shane, Cary Cheek, Jon Brewster (Compression Facilities), plus TBD (1)

EIs – TBD (14)

AIs – TBD (4)

Cultural Resources – Jon Brewster

Biological Resources – TBD

Rover's Construction Management Team, consisting of the Project Construction Manager, Assistant Construction Manager, Chief Inspectors, Assistant Chief Inspectors, Senior Welding Inspectors, Utility/Welding Inspectors, along with the EIs and AIs, will be responsible for the day-to-day construction activities at the Project site.

Key PEPL/TGC Backhaul personnel having responsibility for environmental compliance on the Project will be:

Executive Vice President & Corporate Principal – Joey Mahmoud

Project Director – Eric Estopinal

Project Manager – Don Porter

Construction Managers – Brian Jackson (TGC) and TBD (PEPL)



Environmental Project Manager – Buffy Thomason  
Chief EI for TGC/PEPL – Jacob Koebbe  
Lead EI for TGC – TBD  
Lead EI for PEPL– TBD  
Cultural Resources – TBD  
Biological Resources – TBD

PEPL/TGC Backhaul’s Construction Management Team, consisting of the Project Construction Manager, Chief Inspectors, Welding Inspectors, Utility Inspectors, and Electrical Inspectors, along with the EIs, will be responsible for the day-to-day construction activities at the Project site.

- g. If instances of noncompliance occur on one of the projects, the Chief EI and the respective Lead EI will coordinate with the Construction Spread Superintendent and Project Construction Manager regarding the noncompliance issue and the appropriate corrective action to be implemented. Upon reaching an agreement, the Contractor Crew Foreman will initiate the corrective action and resolve the noncompliance. The EIs (including AIs) will have stop work authority to immediately shut down any operation that might cause serious or irreparable environmental harm. In addition, the EIs will document the issue of noncompliance, the corrective measure that was implemented (and the date the measure was or will be implemented), and whether the corrective measure was successful, for inclusion in required status reports submitted to the Commission.

On the Rover Pipeline Project, effective coordination between the Rover Environmental Inspection Team and the respective FERC Compliance Monitors will be important in identifying and addressing environmental concerns in a timely fashion during construction. If a FERC Compliance Monitor observes instances of noncompliance or problem areas, the Compliance Monitor should contact a representative of the Rover Environmental Inspection Team as soon as possible to initiate immediate corrective action.

Rover anticipates that most potential noncompliance issues will be resolved successfully through cooperation among the Rover and Contractor personnel and through consultations with FERC Compliance Monitors. However, in the absence of full cooperation, the Rover contract provides the means to remedy unsatisfactory work at the Contractor’s expense, as described in the response to Environmental Condition 6.b. above.

The Rover and PEPL/TGC Backhaul Environmental Inspection Teams will evaluate the Contractors’ compliance with the Project’s environmental requirements throughout Project construction and restoration activities. The EI’s will document these findings in daily inspection reports and in the weekly status reports submitted to the Commission.

All non-compliance events (e.g., one that violates Project environmental permits, plans, or conditions and causes damage to an environmental resource or places environmental resources at risk) will be reported to the Commission by informing the FERC Compliance Monitors, and through the EI daily and weekly reporting requirements. Upon identifying a noncompliance event, the EI will take immediate action to inform the appropriate contractor personnel and to identify the required corrective action and appropriate priority and timeframe for completing the corrective action. While immediate corrective action of a noncompliance in the field at the spread level is the preferred course of action, a prescriptive approach also necessitates close coordination



between the Lead EIs, the Chief EI, and contractor construction supervisory personnel to ensure that the corrective measures are successfully implemented.

If a serious violation (e.g. multiple noncompliance events of a similar nature, or a single event that causes damage to a sensitive environmental resource) is identified by the FERC Compliance Monitors or the Rover or PEPL/TGC Backhaul Environmental Inspection Teams, the Environmental Project Manager, Construction Supervisory personnel, and the FERC Project Manager and appropriate members of the FERC Compliance Monitoring Team (on the Rover Pipeline Project) will meet (or conference call) with the Chief and Lead EI to discuss the violation, the proper corrective actions, and follow-up enforcement actions that should be imposed.

- h. Attached as Enclosure 6b are an overall project schedule for Rover and individual schedules for all the pipeline segments, compressor stations, and meter stations for all the Projects, which include dates for: 1) the completion of all required surveys and reports, 2) environmental compliance training of onsite personnel; 3) the start of construction; 4) and the start and completion of restoration for each activity.





7. **Rover** shall employ at least one EI per construction spread. **Trunkline and Panhandle** shall employ at least one EI per major aboveground facility modification. The EIs shall be:

- a. responsible for monitoring and ensuring compliance with all mitigation measures required by the Order and other grants, permits, certificates, or other authorizing documents;
- b. responsible for evaluating the construction contractor's implementation of the environmental mitigation measures required in the contract (see condition 6 above) and any other authorizing document;
- c. empowered to order correction of acts that violate the environmental conditions of the Order, and any other authorizing document;
- d. a full-time position, separate from all other activity inspectors;
- e. responsible for documenting compliance with the environmental conditions of the Order, as well as any environmental conditions/permit requirements imposed by other federal, state, or local agencies; and
- f. responsible for maintaining status reports.

**Response:**

Applicants will comply with Environmental Condition 7.



8. *Beginning with the filing of its Implementation Plan, Rover shall file updated status reports with the Secretary on a **weekly basis until all construction and restoration activities are complete**. Beginning with the filing of their respective Implementation Plans, Panhandle and Trunkline shall file updated status reports with the Secretary on a **monthly basis until construction and restoration activities are complete**. On request, these status reports will also be provided to other federal and state agencies with permitting responsibilities. Status reports shall include:*

- a. an update on the applicant's efforts to obtain the necessary federal authorizations;*
- b. the construction status of the their respective Project facilities, work planned for the following reporting period, and any schedule changes for stream crossings or work in other environmentally sensitive areas;*
- c. a listing of all problems encountered and each instance of noncompliance observed by the EIs during the reporting period (both for the conditions imposed by the Commission and any environmental conditions/permit requirements imposed by other federal, state, or local agencies);*
- d. a description of corrective actions implemented in response to all instances of noncompliance, and their cost;*
- e. the effectiveness of all corrective actions implemented;*
- f. a description of any landowner/resident complaints that may relate to compliance with the requirements of the Order, and the measures taken to satisfy their concerns; and*
- g. copies of any correspondence received by the applicants from other federal, state, or local permitting agencies concerning instances of noncompliance, and the applicant's response.*

**Response:**

Applicants will comply with this requirement.

9. Prior to receiving written authorization from the Director of OEP to commence construction of their respective Project facilities, each applicant shall file documentation that it has received all applicable authorizations required under federal law (or evidence of waiver thereof).

**Response:**

Below in Table 9-1, 9-2, and 9-3 are listings of all authorizations required under federal law (or evidence of waiver thereof) in each respective state and the current status of those authorizations with respect to construction for each of the Projects. Copies of correspondence are enclosed as Enclosure 9. Cultural Resources addendum reports are filed as Privileged and Confidential.

**TABLE 9-1**  
**Rover Permits and Approvals**

Agency and Contact Information	Permit/Consultation	Submittal / Anticipated Submittal Date	Receipt of Approval/Permit
<b>FEDERAL</b>			
FERC	Section 7(c)	February 2015	February 2017
U.S. Army Corps of Engineers Huntington District Pittsburgh District Buffalo District Detroit District	Permit - Section 404 of the Clean Water Act (CWA) Permit - Section 10 of the Rivers & Harbors Act	February 2015	<i>Pending</i>
U.S. Army Corps of Engineers Huntington District	Flowage Consent to Easement approval	April 2016	<i>Pending</i>
U.S. Environmental Protection Agency	As part of delegation of Section 404/401 to MIDEP, may provide comments on the project	April 2016 (final update)	October 2016
U.S. Forest Service Wayne National Forest	Wayne National Forest, may provide comments on crossing within Forest Service (FS) boundary. No FS-owned land is crossed.	Initiated Consultation in June 2014	August 2014 (no FS land crossed)
U.S. Fish & Wildlife Service West Virginia Ecological Services Field Office Pennsylvania Ecological Services Field Office Ohio Ecological Services Field Office East Lansing Ecological Services Field Office	Consultation - Section 7 Endangered Species Act  Consultation - Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act	Initiated June 2014	September 2016 November 2016  November 2016

**TABLE 9-1**  
**Rover Permits and Approvals**

Agency and Contact Information	Permit/Consultation	Submittal / Anticipated Submittal Date	Receipt of Approval/Permit
<b>WEST VIRGINIA</b>			
West Virginia Department of Environmental Protection Division of Water and Waste Management	Section 401 Water Quality Certification.	April 2016	<i>Pending</i>
	NPDES Construction Stormwater approval by Facility	Burgettstown Majorsville Sherwood/CGT	October 2016 December 2016 December 2016
	Hydrostatic test water discharge permit	<i>2<sup>nd</sup> quarter 2017</i>	<i>2<sup>nd</sup> quarter 2017</i>
Division of Air Quality	Air permit	February 2015	February 2016
West Virginia Division of Natural Resources Office of Land and Streams	Permit for crossings of regulated waterbodies, if applicable	July 2016	July 2016 October 2016 November 2016
West Virginia Division of Culture and History	Consultation Section 106 National Historic Preservation Act	Initiated June 2014	August 2016
<b>PENNSYLVANIA</b>			
Pennsylvania Department of Environmental Protection Southwest (Pittsburgh) Regional Office	Section 401 Water Quality Certification	January 2016	December 2016
	Air Permit	February 2015	March 2015
Washington County Conservation District	Erosion & Sediment Control General Permit (ESCGP)	January 2016	December 2016
	BDWM GP-8 Temporary Road Crossing Permit and BDWM GP-5 Utility Line Crossing Permit	January 2016	December 2016
Pennsylvania Department of Conservation and Natural Resources Bureau of Recreation and Conservation	Consultation - State listed species	Initiated June 2014	November 2015 (2 years)
Pennsylvania Fish and Boat Commission	Consultation - State listed species	Initiated June 2014	May 2015 (2 years)
Pennsylvania Game Commission	Consultation - State listed species	Initiated June 2014	March 2016 (2 years)
Pennsylvania Historical & Museum Commission	Consultation Section 106 National Historic Preservation Act	Initiated June 2014	January 2016
<b>OHIO</b>			
Ohio Environmental Protection Agency Division of Surface Water	Section 401 Water Quality Certification	November 2015	<i>Pending</i>
	NPDES Hydrostatic Test Discharge Permit	<i>2<sup>nd</sup> quarter 2017</i>	<i>2<sup>nd</sup> quarter 2017</i>
Division of Air Pollution Control	Air Permit	February 2015	September 2016

**TABLE 9-1**  
**Rover Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
Ohio Department of Natural Resources	Consultation - State listed species	Initiated June 2014	August 2016
Ohio State Historic Preservation Office Resource Protection and Review	Consultation Section 106 National Historic Preservation Act	Initiated June 2014	October 2016
<b>MICHIGAN</b>			
Michigan Dept. of Environmental Quality Water Resources Division Lansing District Office Jackson District Office (Lead)	Delegated 401/404. Inland Lakes and Streams (Part 301) and Wetland (Part 303) Permit	February 2015	November 2016
	Soil Erosion & Sedimentation Control (SESC) approval (pending county SESC approved plans)	<i>December 2016</i>	<i>Pending</i>
	Water Withdrawal Permit	<i>2<sup>nd</sup> quarter 2017</i>	<i>2<sup>nd</sup> quarter 2017</i>
	Groundwater (hydrostatic) Discharge Permit	<i>2<sup>nd</sup> quarter 2017</i>	<i>2<sup>nd</sup> quarter 2017</i>
Michigan Department of Natural Resources	Consultation - State listed species	Initiated June 2014	December 2016
Michigan State Housing Development Authority Historic Preservation	Consultation Section 106 National Historic Preservation Act	Initiated June 2014	October 2016 November 2016
County Drain Commissions: Lenawee County Washtenaw County Livingston County	SESC Plan Approval	October 2016	December 2016 November 2016 <i>Pending</i>

**TABLE 9-2**  
**Panhandle Eastern Pipe Line Company Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
<b>FEDERAL</b>			
Federal Energy Regulatory Commission	Section 7(c)	February 2015	February 2015

**TABLE 9-2**  
**Panhandle Eastern Pipe Line Company Permits and Approvals**

Agency and Contact Information	Permit/Consultation	Submittal / Anticipated Submittal Date	Receipt of Approval/Permit
United States Fish and Wildlife Service Michigan, East Lansing Ecological Services Field Office, Ohio, Reynoldsburg Ecological Services Field Office Indiana, Bloomington Ecological Services Field Office Illinois, Marion Ecological Services Field Office	Consultation Under Section 7 Endangered Species Act	December 17, 2014  Extension Request December 28, 2016	MI - January 20, 2015 OH - December 29, 2014 IN - December 3, 2014 IL - December 19, 2014  MI – January 20, 2017 OH – February 2, 2017 IN – February 1, 2017 IL – January 24, 2017
<b>MICHIGAN</b>			
Michigan State Housing Development Authority Historic Preservation	Consultation - Section 106 of the National Historic Preservation Act	December 17, 2014  Extension Request December 28, 2016	February 18, 2015  January 31, 2017
Michigan Department of Natural Resources	Consultation - State Threatened and Endangered Species	December 17, 2014  Extension Request December 28, 2016	May 4, 2015  January 25, 2017
Michigan Department of Environmental Quality	NPDES Permit for Construction Stormwater Discharges	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
	Groundwater Discharge (Hydrostatic Test Water)	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
Office of Lenawee Drain Commissioner	NPDES Permit for Construction Stormwater Discharges	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
<b>OHIO</b>			
Ohio State Historic Preservation Office Resource Protection and Review	Consultation - Section 106 of the National Historic Preservation Act	December 17, 2014  Extension Request December 28, 2016	February 23, 2015  January 24, 2017
Ohio Department of Natural Resources	Consultation - State Threatened and Endangered Species	December 17, 2014  Extension Request December 28, 2016	February 18, 2015  February 1, 2017
Ohio Environmental Protection Agency Division of Surface Water	NPDES Permit - Construction Stormwater Discharges Notice of Intent	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
	Surface Water Discharge (Hydrostatic Test Water)	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
<b>INDIANA</b>			

**TABLE 9-2**  
**Panhandle Eastern Pipe Line Company Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
Indiana Department of Natural Resources Division of Historical Preservation and Archaeology	Consultation - Section 106 of the National Historic Preservation Act	December 17, 2014 Extension Request December 28, 2016	January 19, 2015 March 29, 2016 January 27, 2017
Indiana Department of Natural Resources Division of Water	Consultation - State Threatened and Endangered Species	December 17, 2014 Extension Request December 28, 2016	December 29, 2014 December 30, 2016
Indiana Department of Environmental Management	NPDES Permit - Construction Stormwater Discharges	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
	Surface Water Discharge (Hydrostatic Test Water)	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
<b>ILLINOIS</b>			
Illinois Historic Preservation Agency	Consultation - Section 106 of the National Historic Preservation Act	December 17, 2014 Extension Request December 28, 2016	January 12, 2015 January 11, 2017
Illinois Department of Natural Resources EcoCat Review	Consultation - State Threatened and Endangered Species	December 12, 2014 Extension Request December 28, 2016	December 12, 2014 December 28, 2016
Illinois Environmental Protection Agency	NPDES Permit - Construction Stormwater Discharges	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017
	Surface Water Discharge (Hydrostatic Test Water)	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017

**TABLE 9-3**  
**Trunkline Gas Company Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
<b>FEDERAL</b>			
Federal Energy Regulatory Commission	Section 7(c)	February 2015	February 2015

**TABLE 9-3**  
**Trunkline Gas Company Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
United States Fish and Wildlife Service Illinois, Marion Ecological Services Field Office Tennessee, Cookeville Ecological Services Field Office Mississippi, Jackson Ecological Services Field Office	Consultation Under Section 7 Endangered Species Act	December 22, 2014  Extension Request December 27, 2016	IL – December 24, 2014 TN – February 6, 2015 and February 18, 2016 MS – January 5, 2015  IL – January 24, 2017 TN – December 28, 2016 MS – January 3, 2017
<b>ILLINOIS</b>			
Illinois Historic Preservation Agency	Consultation - Section 106 of the National Historic Preservation Act	December 22, 2014  Extension Request December 27, 2016	January 22, 2015  January 11, 2017
Illinois Department of Natural Resources	Consultation - State Threatened and Endangered Species	December 15, 2014  Extension Request December 27, 2016	December 15, 2014  December 28, 2016
Illinois Environmental Protection Agency	NPDES Permit Construction Stormwater Discharges Notice of Intent  Surface Water Discharge (Hydrostatic Test Water)	N/A - Exempt  1 <sup>st</sup> Quarter 2017	N/A - Exempt  1 <sup>st</sup> Quarter 2017
<b>TENNESSEE</b>			
Tennessee Historical Commission	Consultation - Section 106 of the National Historic Preservation Act	December 22, 2014  Extension Request December 27, 2016	January 8, 2015  January 10, 2017
Tennessee Wildlife Resources Agency	Consultation - State Threatened and Endangered Species	December 22, 2014  Extension Request December 27, 2016	January 13, 2015  January 26, 2017
Tennessee Department of Environment and Conservation	NPDES Permit for Construction Stormwater Discharges  Surface Water Discharge (Hydrostatic Test Water)	November 9, 2016  1 <sup>st</sup> Quarter 2017	Pending  1 <sup>st</sup> Quarter 2017
<b>MISSISSIPPI</b>			
Mississippi Department of Archives and History	Consultation - Section 106 of the National Historic Preservation Act	December 22, 2014  Extension Request December 27, 2016	January 23, 2015  January 26, 2017
Mississippi Department of Wildlife, Fisheries, and Parks	Consultation - State Threatened and Endangered Species	December 22, 2014  Extension Request December 27, 2016	January 23, 2015  January 9, 2017



**TABLE 9-3**  
**Trunkline Gas Company Permits and Approvals**

<b>Agency and Contact Information</b>	<b>Permit/Consultation</b>	<b>Submittal / Anticipated Submittal Date</b>	<b>Receipt of Approval/Permit</b>
Mississippi Department of Environmental Quality	NPDES Permit for Construction Stormwater Discharges	N/A - Exempt	N/A - Exempt
	Surface Water Discharge (Hydrostatic Test Water)	1 <sup>st</sup> Quarter 2017	1 <sup>st</sup> Quarter 2017



*10. Each applicant must receive written authorization from the Director of OEP **before placing its respective project into service**. Such authorization will only be granted following a determination that rehabilitation and restoration of areas affected by the project are proceeding satisfactorily.*

**Response:**

Applicants will comply with this requirement.



**11. *Within 30 days of placing the authorized facilities in service, each applicant shall file an affirmative statement with the Secretary, certified by a senior company official:***

- a. that the facilities have been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or*
- b. identifying which of the Certificate conditions the applicant has complied or will comply with. This statement shall also identify any areas affected by their respective Projects where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.*

**Response:**

Applicants will comply with this requirement.

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 condition 5.*

**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. Current alignment sheets are included as Enclosure 4a.

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**

<b>Begin MP</b>	<b>End MP</b>	<b>Mileage</b>
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
<b>Total Mileage</b>		<b>12.90</b>

*13. **Prior to construction**, Rover shall adopt workspace modifications for MPs 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 Seneca Lateral that incorporates the modification into the Rover Pipeline Project.*

**Response:**

The portion of this property that includes the barns and outbuildings was purchased by Strike Force South, LLC (Strike Force South), the producer with which Rover is connecting at this location. Rover has entered into an interconnect agreement with Strike Force South, wherein the proposed workspace is being assigned to Rover for the Gulfport Meter Station. Strike Force South did not purchase the portion of the tract that includes the house and an additional outbuilding. 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 in Enclosure 13 indicating the workspace will now be 51.3 feet from the residence. Rover does not intend to purchase this residence.

*14. Prior to construction, Rover shall adopt the minor route variations for mileposts (MP) MJL 13.5 and MS 65.0 (as specified in table 3.4.3-3 and depicted in appendix I2 of the final EIS) and adopt the additional mitigation measures for MP BGL 1.0 (see table 3.4.3-3 of the final EIS). Rover shall file with the Secretary updated alignment sheets incorporating these minor route variations.*

**Response:**

Rover will comply with the request to adjust the route at approximate MP 13.5 on the Majorsville Lateral per figure I2-9 provided in the FEIS. Rover will conduct civil and environmental surveys on the route and will continue to work with the landowner to reach an agreement. Rover will submit the results of the surveys to FERC and will not begin work within this tract until notified by FERC that construction may proceed.

Rover has previously complied with the request at MP 65.0 on the Market Segment, adopting the route proposed by FERC in the FEIS, and completely avoiding the forested wetland.

Rover has reached an agreement with the landowners of tract PA-WA-HL-040.000 at approximate MP 1.0 on the Burgettstown Lateral and has addressed all outstanding issues regarding access to the water sources and barns for the horses.



*15. Prior to construction, Rover shall hire a professional geologist to monitor construction of the project in the five areas that were identified in the January 2016 Field Reconnaissance of Karst Prone Areas Report.*

**Response:**

Rover agrees to comply with Environmental Condition 15.

*16. **Prior to construction**, Rover shall file with the Secretary clarification that it has adopted the mitigation measures outlined in its October 2015 Geohazard Evaluation Report.*

**Response:**

Rover will utilize the mitigation measures outlined in the Geohazard Evaluation Report to minimize potential issues during construction. Rover intends to address geohazard concerns in the Supervisor Training that will be conducted prior to construction. Construction and Environmental Inspectors on-site will be trained to help identify potential issues as quickly as possible so that the appropriate mitigation measures can be employed. In addition, Rover will have geotechnical professionals in the field to assist with devising appropriate solutions where potential issues are identified.





*17. **Prior to construction**, Rover shall file information identifying the type of all public water wells located within 150 feet of the Project area without an identified well type and documentation of consultation with appropriate resource agencies for all public water supplies within 150 feet of the project area.*

**Response:**

Please find revised Table 2-1 in Enclosure 4c identifying all verified water wells within 150 feet of the Project area. Water wells that were originally identified from publically available databases but have not verified or identified during surveys have been struck through in red text. No public water wells have been identified within 150 feet of the Project area.



*18. Rover shall provide affected landowners with copies of applicable pre- and post-construction evaluation reports for all wells within 150 feet of the proposed construction work area (and within 2,000 feet of HDD locations in areas of karst terrain). Post-construction evaluations should be performed **as soon as practicable** following the completion of construction in the area of applicable well(s).*

***Response:***

Rover agrees to comply with Environmental Condition No. 18. As noted in Section 4.1.3.6 in the FEIS, the areas of known karst are between mileposts 138.7 and 156.75 along Mainlines A and B. No HDDs are proposed within these areas; therefore, no wells would be located within 2,000 feet of HDD locations within karst terrain.

*19. **Prior to construction**, Rover shall confirm that it will use dry-ditch crossing methods for all waterbodies designated as coldwater fisheries or exceptional warmwater habitat except those already proposed as an HDD crossing.*

**Response:**

Rover confirms that it will use dry-ditch crossing methods for all waterbodies designated as coldwater fisheries or exceptional warmwater habitat except those already proposed as an HDD crossing. These waterbodies are listed in Table 2-2 in Enclosure 4c.

Per Section 4.3.2.5 of the FEIS, Rover will use dry-ditch crossing methods for 16 coldwater fishery perennial waterbody crossings. In addition, Rover will use dry-ditch crossing methods for 11 ephemeral or intermittent tributaries to coldwater fishery and exceptional warmwater perennial waterbodies if flow is present in those waterbodies at the time of construction (these 27 waterbodies also encompass the waterbodies along the Rover pipeline route that support federally listed species). If there is no flow present in these ephemeral and intermittent tributaries, Rover may use open-cut methods.



20. **Prior to construction**, Rover shall file with the Secretary, for the review and written approval by the Director of OEP, a revised Fugitive Dust Control Plan that identifies the following:
- a. *the name and approximate intake location (if applicable) of each water source that will be used to obtain water for dust suppression activities;*
  - b. *how Rover will determine that dust abatement is necessary;*
  - c. *the specific maximum speed limit for construction equipment and procedure for posting and enforcing this speed limit;*
  - d. *the site and/or construction activity conditions requiring the installation of gravel pads;*
  - e. *the track-out control devices that construction traffic will cross;*
  - f. *the maintenance procedures that Rover will use for construction equipment to reduce dust; and*
  - g. *how and under what circumstances Rover will cover open-bodied haul trucks, as appropriate.*

**Response:**

- a. Table 1 within the revised Fugitive Dust Control Plan attached as Enclosure 20 provides information on each waterbody crossed by the Project from which water may be obtained for use in dust suppression.
- b. Dust suppression when it is deemed necessary pursuant to visual inspection by the Environmental Inspector or member of the Construction Management Team present.
- c. Speed shall be kept within the posted limits on public roads. Speed shall not exceed 25 mph for any vehicle on any private, unpaved surface. Speed limits on private areas shall be communicated during the daily safety meeting. Any employee violation of speed limits will lead to a written warning on the first offense and termination thereafter.
- d. Gravel pads will be installed where the pipeline crosses all jurisdictional roads, at permanent access roads to aboveground facilities, and at access roads to contractor yards.
- e. Gravel pads will be used as track-out control devices.
- f. Rover will limit speed on the right-of-way and along access roads, and will use water to suppress dust on the right-of-way and access roads and private roads. Water or dust suppressants may be utilized on public roads if requested or required by the county or local permitting agencies.
- g. Haul trucks shall be cleaned, covered, treated or secured to prevent the escape of materials likely to become airborne during transport.



*21. During construction of its Project, Rover shall not clear any trees between the workspaces for HDD entry and exit sites. Rover may conduct minor brush clearing, less than 3 feet wide, using hand tools only, to facilitate the use of the HDD tracking system or acquisition of water for the makeup of the HDD slurry. During operation, Rover shall not conduct any routine vegetation maintenance along the HDD segments.*

**Response:**

Rover will comply with Environmental Condition No. 21. Rover intends to reduce the size of the pumps and will increase the number of pumps proposed to “daisy chain” the water from the source to the pipeline.



22. ***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 (excluding the wetland at MP 86.7 on the Market Segment).

**Response:**

Rover will comply with Environmental Condition No. 22.



*23. **Prior to construction**, Rover shall revise the Invasive Species Plan, in consultation with the appropriate federal, state, and local agencies, to include mitigation measures that would be taken during construction to prevent the spread of invasive species. Mitigation may include, but is not limited to: training of workers in the recognition of invasive species and to be familiar with locations where invasive species were identified during surveys, cleaning of equipment prior to entering the right-of-way, or setting up wash stations to remove invasive species from vehicles, equipment, and materials in areas identified as having an invasive species present. Rover shall file the revised plan with the Secretary, for review and written approval of the Director of OEP.*

**Response:**

Please find enclosed the revised Invasive Species Plan attached as Enclosure 23.

*24. **Prior to construction**, Rover shall file with the Secretary, its final Migratory Bird Conservation Plan that includes documentation of its consultation with the U.S. Fish and Wildlife Service (FWS) regarding avoidance, minimization, and mitigation measures.*

**Response:**

Rover has concluded the consultation with the USFWS concerning migratory birds as detailed in a letter submitted to FERC on November 21, 2016, which included the final Migratory Bird Conservation Plan. Since that letter, Rover submitted a letter on November 30, 2016 to the USFWS reiterating Rover's commitment to mitigating for impacts to migratory bird habitat. The November 21, 2016 filing to FERC and the November 30, 2016 letter to the USFWS are attached in Enclosure 24.





*25. During construction of its Project, Rover shall adhere to the FWS tree clearing window and shall restrict tree clearing activities to **between October 1 and March 31** in Michigan, Ohio, and Pennsylvania and to **between November 15 and March 31** in West Virginia.*

**Response:**

Rover agrees to comply with Environmental Condition No. 25.

26. Rover shall not begin construction of the Rover Pipeline Project **until** it files with the Secretary its Indiana Bat Conservation Plan and has received written notification from the Director of OEP that construction and/or use of mitigation may begin.

**Response:**

An Indiana Bat Conservation Plan (IBCP) was required for the Project area through a known use buffer in Doddridge County, West Virginia, as well through as a 0.9-mile area in Doddridge County where mist net surveys were not possible. The USFWS West Virginia Field Office approved the IBCP on November 14, 2016 in a letter addressed to Rover and FERC concurrently. The final, approved IBCP and the letter from the USFWS West Virginia Field Office is attached as Enclosure 26.



*27. **Prior to construction**, Rover shall confirm that it will incorporate into its construction plans requirements that worksites be maintained in a neat and orderly manner, with all personal trash items disposed of properly; and that construction debris be removed from all work areas in a timely manner, and disposed of in a state-approved off site location by the end of each work day.*

**Response:**

Rover has complied with Environmental Condition No. 27 by including this requirement in the construction specifications and contract documents, and will include it in the Supervisor and Crew environmental training programs and the Environmental Permit Book. It is also addressed in the Rare, Threatened, and Endangered Species Guide developed for the Project. All personnel will be informed of this requirement prior to beginning work on the Project.

28. **Prior to construction**, Rover shall continue to consult with applicable state agencies to identify any additional mitigation measures for state-protected species and the need for additional surveys for Ohio, Michigan, West Virginia, and Pennsylvania. The results of such consultations and any outstanding surveys shall be filed with the Secretary.

**Response:**

Rover filed the results of surveys completed between March and August, 2016 on September 9, 2016, in its comments on the Final Environmental Impact Statement, as well as agency concurrence with the findings of those surveys. Comments were received from the Michigan Department of Natural Resources (MDNR) on the eastern massasauga and Blanding's turtle survey report on December 6, 2016 and are attached in Enclosure 28.

In addition, Rover completed additional mussel surveys at six streams in Michigan in September 2016 at the request of the MDNR (see Attachment 33-1). One of the Wolf Creek crossings (S2K-LE-177) had a high abundance of mussels, including the round pigtoe, a species of special concern in Michigan. A second Wolf Creek crossing (S1K-LE-175) had a low overall abundance of mussels, but did contain three live round pigtoe specimens. At the request of the MDNR, Rover will relocate mussels at these two stream crossings prior to construction in accordance with the *Michigan Mussel Survey Protocols and Relocation Procedures* (Final Draft, June 2016) and as outlined in the *Rover Pipeline Mussel Relocation Plan* (see Attachment 33-2). The relocation will be completed in 2017, prior to construction across these streams and between May 1 and October 15, when the water temperature is greater than 50°F and the air temperature is between 50 and 90°F. The MDNR will review the relocation site and provide approval on the plan before the relocation.

29. **Prior to construction**, Rover shall file with the Secretary, for the review and written approval of the Director of OEP, evidence of landowner concurrence with the site-specific residential construction plans for all locations where construction work areas would be within 10 feet of a residence (including residences within the construction workspace).

**Response:**

The revised Table 8A-3 below presents the tracts containing residences within 10 feet of the construction workspace. Easements have been purchased for each one.

**Table 8A-3. Residences within 10 feet of Workspace**

MP	County	State	Type of Structure	Direction from Centerline	Distance from Centerline (ft)	Distance from Construction Work Area (ft) <sup>2</sup>	Residential Plan Drawing Number <sup>1</sup>	Date of Easement Closing
<b>Sherwood Lateral</b>								
34.42	Monroe	OH	MOBILE HOME <sup>3</sup>	COINCIDENT	0	0	OH-MO-SHC-003.000	6/22/16
35.8	Monroe	OH	Hunting Cabin	COINCIDENT	0	0	OH-MO-SC-006.000	8/29/16
<b>Seneca Lateral</b>								
3.39	Monroe	OH	LOG CABIN	NORTH	42.39	2.4	OH-MO-SCL-010.000	8/4/2016
<b>Clarrington Lateral</b>								
7.98	Belmont	OH	MOBILE HOME	EAST	79.4	0	OH-BE-CC-043.000	8/26/2015
18.36	Belmont	OH	CABIN	WEST	45.4	5.4	OH-BE-CC-100.00	1/6/2016
<b>Majorsville Lateral</b>								
7.24	Marshall	WV	MOBILE HOME <sup>3</sup>	NORTH	17.42	0	WV-MA-ML-038.000_RI_EX	9/8/2016
11.38	Marshall	WV	MOBILE HOME <sup>3</sup>	COINCIDENT	0	0	WV-MA-ML-063.310	4/10/2015
<b>Burgettstown Lateral</b>								
37.06	Carroll	OH	HOUSE UNDER CONSTRUCTION <sup>3</sup>	NORTH	17.4	0	OH-CA-HL-011.100	4/20/2016
49.02	Carroll	OH	HOUSE <sup>3</sup>	NORTH	61.7	0	OH-CA-HL-071.000	7/24/2015
12.36	Harrison	OH	HUNTING CABIN <sup>3</sup>	WEST	22.17	0	OH-HR-035.000	10/24/2015
<b>Mainlines A and B</b>								
31.41	Tuscarawas	OH	HOUSE <sup>3</sup>	EAST	35.4	0	OH-TU-024.000	6/18/2015

MP	County	State	Type of Structure	Direction from Centerline	Distance from Centerline (ft)	Distance from Construction Work Area (ft) <sup>2</sup>	Residential Plan Drawing Number <sup>1</sup>	Date of Easement Closing
31.43	Tuscarawas	OH	MOBILE HOME <sup>3</sup>	COINCIDENT	0.7	0	OH-TU-024.000	6/18/2015
69.34	Wayne	OH	HOUSE <sup>3</sup>	NORTH	55.7	0	OH-WA-052.532	5/13/2015
71.05	Wayne	OH	HOUSE <sup>3</sup>	NORTH	20.1	0	OH-WA-074.000	1/15/2016
<b>Market Segment</b>								
73.45	Washtenaw	MI	HOUSE	EAST	135.1	5.1	RIP-WA-MP 073.45	7/22/2015
85.47	Livingston	MI	HOUSE	COINCIDENT	0	0	RIP-LI-MP 085.47	3/20/2015
88.35	Livingston	MI	HOUSE	SOUTH	34.3	0	RIP-LI-MP 088.35	2/12/2016

*30. **Prior to construction**, Rover shall file with the Secretary a 5-year post-construction monitoring program to evaluate crop productivity in areas impacted by the construction of the Project. Rover shall include in the program a commitment to file with the Secretary quarterly reports for a period of 5 years following construction documenting any crop-related problems, including soil heating near compressor stations identified by the company or landowner, and describing any corrective action taken to remedy those problems. The program shall stipulate that if any landowner agrees that revegetation and crop productivity are successful prior to the 5-year requirement, Rover shall provide documentation in its quarterly reports, indicating which landowners have agreed that monitoring is no longer necessary. This documentation shall include the landowner name, tract number, and the date of agreement.*

**Response:**

As requested, Rover will conduct surveys of agricultural areas during each growing season for five years following construction. Revegetation shall be considered successful when upon visual survey, crop growth and vigor are similar to adjacent, undisturbed portions of the same field, unless the easement agreement specifies otherwise. Rover will file within quarterly reports any crop-related problems, including soil heating near compressor stations, and will include any corrective actions taken or to be taken to address these issues. Rover will indicate in the quarterly reports the name, tract number, and date of agreement for landowners who have agreed that monitoring is no longer necessary, although the right-of-way will continue to be monitored by Operations. Surveys in each growing season will be conducted in agricultural areas for which consent from the landowner has not been received to document that the area has been successfully revegetated. Revegetation efforts will be continued until revegetation is successful.



*31. **Prior to construction**, Rover shall consult with the OHDA on construction procedures to be used in agricultural land in Ohio, and Rover shall file with the Secretary any updates to the Ohio AIMP that result from coordination with the OHDA. Any comments received from the OHDA on Rover's Ohio AIMP shall also be filed with the Secretary.*

**Response:**

Rover submitted a letter to the Ohio Department of Agriculture (ODA) on December 2, 2016 (attached as Enclosure 31) addressing elements of the Agricultural Impact Mitigation Plan (AIMP) and the ODA's *Ohio Pipeline Standard and Construction Specifications*, as amended on December 28, 2015. Any comments received from ODA will be filed with FERC.



32. *Prior to construction in agricultural lands, Rover shall file with the Secretary its final Drain Tile Relocation and Reclamation Plans including documentation of landowner consultation with the plans.*

**Response:**

Table 32 below lists the tracts wherein Rover is proposing drainage tile plans, and the status of the plans. All plans are being drafted based on tract-specific information and considerations, including landowner requests. Rover has voluntarily enacted this effort to coordinate so closely with the landowners to further reduce potential impacts to agricultural land. If Rover is unable to finalize a drain tile plan with landowners prior to construction, the existing drain tile system will be repaired as is typically required per the FERC Plan.

Copies of the finalized drain plans received to date are included under Privileged and Confidential in Enclosure 32 electronically.

**Table 32. Drainage Tile Plan Status**

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
Mainlines A and B			
OH-HA-CC-024.000-ROW	2,080.21	2/12/2016	12/10/2016
OH-HR-015.000-ROW	5,267.30	2/22/2016	10/1/2016
OH-ST-016.000-ROW	3283.30	8/30/2016	9/30/2016
OH-ST-025.000-ROW	2679.40	1/16/2017	
OH-ST-030.000-ROW	1689.70	1/16/2017	1/23/2017
OH-ST-032.000-ROW	5,031.90	8/25/2016	
OH-ST-036.000-ROW	2,425.40	8/25/2016	9/1/2016
OH-ST-045.000-ROW	1,352.50	5/16/2016	
OH-ST-046.000-ROW	1012.70	10/07/2016	
OH-ST-049.000-ROW	2857.30	10/21/2016	
OH-WA-021.000-ROW	1509.30	9/1/2016	9/14/2016
OH-WA-023.000-ROW	1814.30	8/30/2016	10/17/2016
OH-WA-030.000-ROW	1298.30	10/19/2016	1/25/2017
OH-WA-031.000-ROW	2892.40	9/7/2016	10/21/2016
OH-WA-033.000-ROW	2,418.30	8/24/2016	9/1/2016
OH-WA-036.000-ROW	1432.50	9/7/2016	11/29/2016
OH-WA-041.000-ROW	1360.70	10/19/2016	
OH-WA-043.000-ROW	2761.30	9/10/2016	9/21/2016
OH-WA-048.000-ROW	1,353.30	8/25/2016	9/20/2016
OH-WA-052.000-ROW	3,546.00	11/15/2016	
OH-WA-052.536-ROW	1,829.30	7/25/2016	
OH-WA-077.000-ROW	X		Provisions Only
OH-WA-079.000-ROW	1471.60	NA	Provisions Only
OH-WA-085.000-ROW	1660.30	9/10/2016	11/2/2016
OH-WA-086.000-RPW	1554.20	10/7/2016	11/2/2016
OH-WA-089.000-ROW	1594.90	8/26/2016	8/30/2016

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-WA-091.000-ROW	4,008.60	8/8/2016	8/15/2016
OH-WA-098.500-ROW	1,791.20	9/21/2015	5/2/2015
OH-WA-100.500-ROW	516.20	9/30/2016	10/13/2016
OH-WA-101.000-ROW	2204.20	9/14/2016	10/13/2016
OH-WA-101.510-ROW	2,401.60	8/17/2016	8/17/2016
OH-AS-005.000-ROW	2937.00	11/1/2016	
OH-AS-011.000-ROW	2937.00	11/1/2016	
OH-AS-015.000-ROW	2388.70	11/1/2016	
OH-AS-017.520-ROW	634.70	9/1/2016	12/8/2016
OH-AS-026.508-ROW	1,075.20	6/15/2016	
OH-AS-026.525-ROW	3128.00	9/1/2016	9/14/2016
OH-AS-026.540-ROW	1,697.00	7/25/2016	8/16/2016
OH-AS-026.549-ROW	2,767.00	8/29/2016	9/20/2016
OH-AS-039.000-ROW	5,413.60	4/5/2016	5/27/2016
OH-AS-043.000-ROW	1661.10	4/6/2016	Provisions Only
OH-AS-045.000-ROW	904.80	8/18/2016	
OH-AS-046.000-ROW	4,705.20	5/13/2016	
OH-AS-047.000-ROW	2663.20	12/6/2016	
OH-AS-050.000-ROW	3,480.20	8/18/2016	
OH-AS-051.000-ROW	1,967.20	8/18/2016	
OH-RI-011.000-ROW	2747.50	10/19/2016	11/17/2016
OH-RI-013.000-ROW	1355.90	8/24/2016	Provisions Only
OH-RI-014.000-ROW	1329.10	9/9/2016	9/28/2016
OH-RI-015.000-ROW	2360.70	9/7/2016	9/19/2016
OH-RI-021.000-ROW	2,048.50	2/22/2016	9/28/2016
OH-RI-024.000-ROW	1189.20	11/1/2016	11/4/2016
OH-RI-025.000-ROW	1478.40	9/7/2016	9/8/2016
OH-RI-026.000-ROW	2698.60	10/7/2016	
OH-RI-027.000-ROW	5,567.60	8/18/2016	8/31/2016
OH-RI-031.000-ROW	2,606.50	9/9/2015	
OH-RI-034.000-ROW	689.50	11/1/2016	
OH-RI-036.000-ROW	1473.60	9/9/2016	9/14/2016
OH-RI-037.000-ROW	1,425.30	7/22/2015	
OH-RI-038.000-ROW	4,789.10	2/9/2016	5/17/2016
OH-RI-041.000-ROW	2515.70	9/7/2016	9/8/2016
OH-RI-042.000-ROW	1,334.70	7/8/2016	10/6/2016
OH-RI-042.500-ROW	1,319.60	7/8/2016	10/6/2016
OH-RI-043.000-ROW	3,933.10	7/11/2016	8/25/2016
OH-RI-048.000-ROW	2032.40	10/21/2016	11/4/2016
OH-RI-054.000-ROW	337.40	10/13/2016	10/14/2016
OH-RI-056.000-ROW	1903.80	9/7/2016	10/2/2016
OH-RI-057.000-ROW	933.40	8/24/2016	8/31/2016
OH-RI-058.000-ROW	35.40	9/7/2016	10/2/2016

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-RI-059.000-ROW	3,300.20	8/8/2016	
OH-RI-061.000-ROW	1,755.20	8/6/2015	
OH-RI-062.000-ROW	1,501.40	8/6/2015	
OH-CR-001.000-ROW	1,346.20	4/5/2016	
OH-CR-002.000-ROW	1649.80	10/19/2016	
OH-CR-003.000-ROW	472.20	10/19/2016	
OH-CR-004.000-ROW	1,401.50	7/20/2016	8/15/2016
OH-CR-005.000-ROW	3,047.50	7/22/2016	
OH-CR-006.000-ROW	1,390.30	7/25/2016	
OH-CR-007.000-ROW	489.50	11/1/2016	
OH-CR-008.000-ROW	2,219.20	7/25/2016	
OH-CR-010.000-ROW	1998.40	11/1/2016	
OH-CR-011.000-ROW	1,949.30	5/16/2016	
OH-CR-012.000-ROW	3234.50	11/1/2016	
OH-CR-013.000-ROW	2,619.60	8/24/2016	8/27/2016
OH-CR-014.000-ROW	1852.50	9/30/2016	
OH-CR-015.000-ROW	3980.20	9/30/2016	
OH-CR-018.000-ROW	1077.30	10/19/2016	
OH-CR-019.000-ROW	1687.40	10/19/2016	
OH-CR-020.000-ROW	1,525.60	5/16/2016	
OH-CR-023.000-ROW	1,498.80	5/16/2016	
OH-CR-024.000-ROW	1073.70	11/1/2016	
OH-CR-025.000-ROW	413.50	8/17/2016	8/30/2016
OH-CR-026.000-ROW	2,207.60	8/18/2016	
OH-CR-027.000-ROW	394.30	8/18/2016	
OH-CR-028.000-ROW	36.70	7/11/2016	8/30/2016
OH-CR-029.000-ROW	832.20	7/11/2016	
OH-CR-030.000-ROW	3360.00	12/19/2016	
OH-CR-031.000-ROW	1,423.00	5/16/2016	
OH-CR-032.000-ROW	3,082.60	8/26/2015	9/28/2016
OH-CR-033.000-ROW	816.40	6/29/2015	7/10/2015
OH-CR-037.000-ROW	285.90	2/22/2016	
OH-CR-039.000-ROW	1,541.60	2/22/2016	
OH-CR-040.000-ROW	389.50	5/16/2016	8/16/2016
OH-CR-041.000-ROW	1,280.50	7/31/2015	
OH-CR-042.000-ROW	1,293.30	2/22/2016	7/6/2016
OH-CR-043.000-ROW	1,737.90	8/31/2015	8/15/2016
OH-CR-044.000-ROW	3,429.70	7/17/2015	
OH-CR-045.000-ROW	1,395.40	7/24/2015	
OH-CR-046.000-ROW	1,131.10	8/8/2015	
OH-CR-047.000-ROW	119.20	4/5/2016	8/31/2016
OH-CR-048.000-ROW	548.80	4/5/2016	
OH-CR-049.000-ROW	2,037.90	8/10/2015	

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-CR-050.000-ROW	909.70	5/16/2016	
OH-CR-052.000-ROW	278.80	5/16/2016	
OH-CR-053.000-ROW	1,185.40	8/31/2015	9/20/2016
OH-CR-054.000-ROW	1,459.50	7/25/2016	8/31/2016
OH-CR-055.000-ROW	1,328.80	7/17/2015	
OH-CR-057.000-ROW	636.20	4/5/2016	
OH-CR-058.000-ROW	2,330.80	4/5/2016	
OH-CR-059.000-ROW	2,969.40	4/5/2016	
OH-CR-062.000-ROW	1484.80	8/30/2016	8/31/2016
OH-CR-063.000-ROW	2,201.20	9/29/2015	11/15/2016
OH-CR-064.000-ROW SSE	767.10	5/16/2016	(2 TILING PLANS)
OH-CR-065.000-ROW	238.10	7/30/2015	
OH-SE-001.000-ROW	1289.20	1/16/2017	
OH-SE-003.000-ROW	1639.90	8/29/2016	8/31/2016
OH-SE-004.000-ROW	735.60	8/24/2015	
OH-SE-005.000-ROW	71.60	9/1/2015	
OH-SE-006.000-ROW	1,491.60	8/24/2015	
OH-SE-007.000-ROW	1,477.70	8/11/2015	
OH-SE-008.000-ROW	1,585.80	10/1/2015	11/9/2016
OH-SE-011.000-ROW	5,600.60	9/4/2015	
OH-SE-023.000-ROW	391.20	8/27/2015	
OH-SE-025.000-ROW	1,571.30	8/19/2015	
OH-SE-031.000-ROW	1,906.90	8/31/2015	2/15/2016
OH-SE-033.000-ROW	3,368.10	12/22/2015	12/23/2015
OH-SE-037.000-ROW	2,022.60	10/22/2015	
OH-SE-039.000-ROW	2,771.50	2/27/2016	
OH-SE-046.000-ROW	2,222.20	2/29/2016	
OH-SE-052.000-ROW	2,800.80	9/2/2015	
OH-SE-053.000-ROW	2,029.30	9/1/2015	
OH-SE-055.000-ROW	1,182.30	9/2/2015	
OH-SE-057.000-ROW	619.90	2/6/2016	
OH-SE-058.000-ROW	1,054.10	9/16/2015	
OH-SE-059.100-ROW	722.90	8/27/2015	
OH-SE-059.120-ROW	594.00	4/6/2016	
OH-SE-059.130-ROW	1,020.60	4/6/2016	9/29/2016
OH-SE-060.000-ROW	1441.30	4/6/2016	9/29/2016
OH-SE-063.000-ROW	2893.50	11/1/2016	
OH-SE-064.000-ROW	1637.70	1/24/2017	
OH-SE-066.000-ROW	5,505.40	2/6/2016	
OH-SE-069.000-ROW	1,363.20	12/16/2015	12/21/2015
OH-SE-072.000-ROW	1,825.90	2/29/2016	9/13/2016
OH-SE-073.000-ROW	737.20	10/10/2015	12/21/2016
OH-SE-075.000-ROW	4685.20	11/1/2016	

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-SE-076.000-ROW	699.70	12/19/2016	
OH-SE-077.000-ROW	3,982.90	2/22/2016	
OH-SE-086.000-ROW	1267.90	9/30/2016	
OH-SE-087.000-ROW	2615.90	9/30/2016	
OH-SE-088.000	478.80	9/30/2016	
OH-HA-001.000-ROW	1,544.50	10/6/2015	10/20/2015
OH-HA-003.000-ROW	972.70	10/14/2015	
OH-HA-004.000-ROW	1,366.10	5/10/2016	10/28/2016
OH-HA-006.000-ROW	2,646.90	10/6/2015	9/20/2016
OH-HA-008.000-ROW	1,974.60	10/6/2015	10/20/2015
OH-HA-009.000-ROW	1,996.20	10/6/2015	10/20/2015
OH-HA-010.000-ROW	1,340.20	1/10/2016	2/25/2016
OH-HA-011.000-ROW	1,752.70	10/6/2015	10/20/2015
OH-HA-012.000-ROW	5,088.40	10/2/2015	10/29/2015
OH-HA-013.000-ROW	1,441.20	10/8/2015	10/27/2016
OH-HA-014.000-ROW	1,513.80	1/10/2016	2/22/2016
OH-HA-015.000-ROW	4,973.40	10/8/2015	10/27/2016
OH-HA-017.000-ROW	399.60	1/10/2016	2/18/2016
OH-WO-001.000-ROW	1,548.80	1/10/2016	2/25/2016
OH-WO-006.000-ROW	1,473.50	8/26/2015	2/19/2016
OH-WO-007.000-ROW	1,065.00	8/26/2015	3/20/2016
OH-WO-008.000-ROW	649.20	9/1/2015	2/25/2016
OH-WO-009.000-ROW	1,193.80	8/26/2015	2/19/2016
OH-WO-013.000-ROW	522.00	8/1/2016	8/29/2016
OH-WO-014.000-ROW	1,597.00	2/12/2016	3/1/2016
OH-WO-016.000-ROW	2,065.60	10/26/2015	2/15/2016
OH-WO-018.000-ROW	1,164.10	4/6/2016	7/13/2016
OH-WO-020.000-ROW	436.40	4/6/2016	5/20/2016
OH-WO-021.000-ROW	1,155.80	2/22/2016	
OH-WO-022.000-ROW	1,077.10	10/26/2015	2/22/2016
OH-WO-024.000-ROW	2,668.20	12/17/2015	2/25/2016
OH-WO-025.000-ROW	553.10	12/15/2015	2/19/2016
OH-WO-026.000-ROW	569.90	10/20/2015	4/4/2016
OH-WO-027.000-ROW	1,573.20	1/11/2016	2/19/2016
OH-WO-028.000-ROW	1,358.50	4/5/2016	6/27/2016
OH-WO-029.000-ROW	694.40	4/5/2016	6/27/2016
OH-WO-031.000-ROW	1174.30	9/30/2016	
OH-WO-032.000-ROW	437.70	12/6/2016	12/9/2016
OH-WO-033.000-ROW	1,252.30	1/10/2016	3/15/2016
OH-WO-034.000-ROW	237.50	4/6/2016	9/12/2016
OH-WO-035.000-ROW	2,482.40	1/10/2016	3/15/2016
OH-WO-038.000-ROW	1,419.20	4/5/2016	5/28/2016
OH-WO-040.000-ROW	1,798.50	4/5/2016	6/9/2016

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-WO-041.000-ROW	5,777.90	1/11/2016	2/25/2016
OH-WO-042.000-ROW	1,452.50	1/12/2016	2/25/2016
OH-WO-044.510-ROW	2,665.70	12/16/2015	1/14/2016
OH-WO-046.500-ROW	1,243.80	1/11/2016	2/19/2016
OH-WO-046.510-ROW	1,283.10	1/11/2016	2/25/2016
OH-WO-050.000-ROW	1,311.90	1/12/2016	2/19/2016
OH-WO-053.000-ROW	2,664.00	1/12/2016	4/13/2016
OH-WO-054.000-ROW	2,674.50	12/10/2015	12/11/2015
OH-WO-055.000-ROW	1335.50	10/20/2016	
OH-WO-056.000-ROW	1,599.90	4/6/2016	8/23/2016
OH-WO-057.000-ROW	1,054.60	6/15/2016	9/21/2016
OH-WO-058.000-ROW	1,452.50	1/12/2016	2/25/2016
OH-WO-059.000-ROW	1,369.40	1/10/2016	3/15/2016
OH-WO-061.000-ROW	2,538.30	11/9/2015	2/25/2016
OH-WO-061.500-ROW	423.00	12/10/2015	12/11/2015
OH-WO-064.000-ROW	1,352.30	10/29/2015	
OH-WO-065.000-ROW	685.90	2/4/2016	2/25/2016
OH-WO-067.000-ROW	2,716.50	12/14/2015	1/19/2016
OH-WO-068.000-ROW	1,985.10	1/10/2016	1/11/2016
OH-WO-069.000-ROW	2700.50	9/10/2016	10/13/2016
OH-WO-070.000-ROW	1061.60	9/30/2016	
OH-WO-071.000-ROW	2010.80	1/16/2017	
OH-WO-072.000-ROW	540.70	9/30/2016	
OH-WO-073.000-ROW	2185.40	9/30/2016	
OH-WO-074.000-ROW	1,344.10	8/22/2016	9/16/2016
OH-WO-075.000-ROW	1,370.30	2/4/2016	
OH-WO-077.100-ROW	1,356.30	8/18/2016	
OH-WO-077.110-ROW	678.10	8/18/2016	
OH-WO-077.120-ROW	678.00	9/30/2016	
OH-WO-078.000-ROW	1125.20	9/30/2016	
OH-WO-078.500-ROW	441.90	9/30/2016	
OH-WO-079.000-ROW	1297.60	9/30/2016	
OH-WO-080.000-ROW	2,694.30	1/8/2016	2/25/2016
OH-WO-080.500-ROW	2582.00	8/29/2016	9/15/2016
OH-WO-080.510-ROW	116.70	9/10/2016	10/22/2016
OH-HE-001.000-ROW	1363.30	8/29/2016	9/15/2016
OH-HE-001.500-ROW	1351.20	8/29/2016	9/15/2016
OH-HE-003.000-ROW	2709.20	11/1/2016	
OH-HE-004.000-ROW	379.10	11/30/2016	
OH-HE-005.000-ROW	1,851.40	4/6/2016	8/8/2016
OH-HE-006.000-ROW	638.30	9/30/2016	
OH-HE-007.000-ROW	1356.00	9/30/2016	
OH-HE-008.000-ROW	679.90	9/30/2016	

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-HE-009.000-ROW	672.80	10/7/2016	
OH-HE-010.000-ROW	1,356.10	5/16/2016	
OH-HE-010.500-ROW	1,354.30	5/16/2016	
OH-HE-011.000-ROW	1,354.20	12/11/2015	2/12/2016
OH-HE-012.000-ROW	1,350.90	4/6/2016	
OH-HE-012.500-ROW	1,343.20	8/18/2016	8/22/2016
OH-HE-014.000-ROW	1327.60	12/15/2016	
OH-HE-015.000-ROW	1,776.40	4/5/2016	8/29/2016
OH-HE-016.000-ROW	1,055.30	8/22/2016	8/24/2016
OH-HE-016.500-ROW	2678.50	8/24/2016	8/25/2016
OH-HE-016.530-ROW	911.20	8/29/2016	9/7/2016
OH-HE-021.000-ROW	2,606.70	6/17/2016	
OH-HE-022.000-ROW	2,661.40	8/22/2016	8/22/2016
OH-HE-022.500-ROW	1366.40	8/29/2016	9/16/2016
OH-HE-023.000-ROW	71.60	8/29/2016	9/4/2016
OH-HE-023.500-ROW	1282.40	10/27/2016	10/31/2016
OH-HE-024.000-ROW	1,341.50	8/17/2016	8/24/2016
OH-HE-025.000-ROW	1,357.60	8/18/2016	8/24/2016
OH-HE-026.000-ROW	2,638.40	2/22/2016	8/12/2016
OH-HE-029.000-ROW	1371.30	8/26/2016	10/3/2016
OH-HE-030.000-ROW	265.60	4/5/2016	7/8/2016
OH-HE-031.000-ROW	1,129.20	8/23/2016	8/26/2016
OH-HE-032.000-ROW	1845.40	8/31/2016	9/20/2016
OH-HE-033.000-ROW	917.20	8/24/2016	8/24/2016
OH-HE-034.000-ROW	1,386.70	2/4/2016	1/18/2017
OH-HE-035.000-ROW	1,368.80	6/15/2016	8/9/2016
OH-HE-036.000-ROW	1382.80	8/24/2016	8/24/2016
OH-HE-038.000-ROW	604.20	9/1/2016	9/20/2016
OH-HE-039.000-ROW	1,028.90	8/24/2016	8/25/2016
OH-HE-040.000-ROW	1,319.40	8/24/2016	8/25/2016
OH-HE-041.000-ROW	1,344.00	12/16/2015	7/8/2016
OH-HE-042.000-ROW	1,360.60	6/29/2016	8/22/2016
OH-HE-043.000-ROW	1,351.60	7/25/2016	8/23/2016
OH-HE-044.000-ROW	1,357.50	7/25/2016	9/2/2016
OH-HE-045.000-ROW	2,805.60	8/25/2016	9/26/2016
OH-HE-046.000-ROW	696.20	7/25/2016	8/23/2016
OH-HE-047.000-ROW	757.20	7/25/2016	8/22/2016
OH-HE-048.000-ROW	1,484.00	8/25/2016	9/29/2016
OH-HE-049.000-ROW	2,592.30	7/25/2016	8/23/2016
OH-HE-050.000-ROW	2706.50	9/1/2016	9/15/2016
OH-HE-051.000-ROW	1906.10	8/31/2016	10/10/2016
OH-HE-053.000-ROW	1340.80	8/31/2016	9/14/2016
OH-HE-055.000-ROW	1321.50	8/31/2016	9/19/2016

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-HE-056.000-ROW	1,317.50	8/24/2016	9/19/2016
OH-HE-061.500-ROW	0.00	8/22/2016	8/25/2016
OH-HE-062.000-ROW	161.40	8/22/2016	8/25/2016
OH-HE-063.000-ROW	992.60	8/23/2016	8/25/2016
OH-DE-001.000-ROW	1344.40	9/1/2016	10/1/2016
OH-DE-002.000-ROW	1409.80	8/29/2016	8/30/2016
OH-DE-003.000-ROW	1494.80	9/7/2016	9/14/2016
OH-DE-004.000-ROW	1,394.40	8/23/16	8/24/2016
OH-DE-005.000-ROW	3446.40	8/24/2016	10/3/2016
OH-DE-006.000-ROW	1,438.30	8/24/2016	9/30/2016
OH-DE-007.000-ROW	735.60	8/24/2016	9/21/2016
OH-DE-008.000-ROW	1738.20	8/30/2016	
OH-DE-009.000-ROW	400.40	8/25/2016	9/30/2016
OH-DE-010.000-ROW	213.60	4/5/2016	8/23/2016
OH-DE-011.000-ROW	790.30	8/30/2016	9/30/2016
OH-DE-012.000-ROW	654.30	8/24/2016	9/23/2016
OH-DE-013.000-ROW	816.70	8/30/2016	
OH-DE-014.000-ROW	650.10	8/31/2016	9/27/2016
OH-DE-015.000-ROW	653.50	2/6/2016	8/9/2016
OH-DE-016.000-ROW	1,498.30	2/29/2016	8/23/2016
OH-DE-018.000-ROW	1,156.20	2/29/2016	8/23/2016
OH-DE-019.000-ROW	1292.80	8/29/2016	9/12/2016
OH-DE-022.000-ROW	1,351.40	7/28/2015	9/8/2015
OH-DE-023.000-ROW	1345.90	11/1/2016	11/4/2016
OH-DE-026.000-ROW	1257.20	9/30/2016	10/12/2016
OH-DE-028.000-ROW	1651.80	9/1/2016	
OH-DE-030.000-ROW	1,372.80	8/24/2016	8/24/2016
OH-DE-031.000-ROW	4375.20	10/10/2016	12/5/2016
OH-DE-031.500-ROW	00.00	8/30/2016	12/7/2016
OH-DE-033.000-ROW	1318.80	8/30/2016	11/21/2016
<b>Market Segment</b>			
OH-DF-002.000-ROW	605.30	8/31/2016	
OH-DF-011.000-ROW	2892.20	8/29/2016	9/8/2016
OH-DF-016.000-ROW	1,197.20	8/25/2016	9/19/2016
OH-DF-017.000-ROW	1,584.80	8/25/2016	8/29/2016
OH-DF-018.000-ROW	2892.60	8/30/2016	9/17/2016
OH-DF-019.000-ROW	501.20	8/24/2016	9/20/2016
OH-DF-020.000-ROW	2,593.90	8/25/2016	9/20/2016
OH-HN-001.000-ROW	535.30	8/24/2016	9/2/2016
OH-HN-002.000-ROW	1,881.20	8/24/2016	9/20/2016
OH-HN-004.000-ROW	739.20	8/18/2016	8/31/2016
OH-HN-005.000-ROW	1,795.70	2/24/2016	8/25/2016
OH-HN-006.000-ROW	1,312.40	8/24/2016	9/2/2016



Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-HN-007.000-ROW	1,073.50	1/10/2016	4/13/2016
OH-HN-008.000-ROW	1647.30	11/2/2016	12/15/2016
OH-HN-009.000-ROW	2,661.80	7/25/2016	8/31/2016
OH-HN-009.500-ROW	2,646.90	8/24/2016	8/25/2016
OH-HN-009.510-ROW	1,245.10	8/24/2016	10/17/2016
OH-HN-011.000-ROW	2570.50	9/14/2016	10/7/2016
OH-HN-012.000-ROW	2,652.80	8/24/2016	9/20/2016
OH-HN-013.000-ROW	2,634.80	7/11/2016	8/15/2016
OH-HN-014.000-ROW	1350.70	8/29/2016	10/19/2016
OH-FU-001.000-ROW	1461.80	12/19/2016	
OH-FU-003.000-ROW	1,536.30	8/18/2016	
OH-FU-004.000-ROW	1,540.70	5/15/2016	8/10/2016
OH-FU-005.000-ROW	1,249.00	5/15/2016	8/10/2016
OH-FU-006.000-ROW	2,055.70	8/25/2016	9/26/2016
OH-FU-007.000-ROW	2,457.90	4/5/2016	8/10/2016
OH-FU-008.000-ROW	1,179.30	2/12/2016	8/23/2016
OH-FU-009.000-ROW	1,647.20	2/29/2016	8/10/2016
OH-FU-010.000-ROW	4,156.80	4/13/2016	
OH-FU-012.000-ROW	760.00	8/18/2016	8/25/2016
OH-FU-013.000-ROW	1267.00	9/2/2016	9/21/2016
OH-FU-015.000-ROW	2,008.70	2/22/2016	7/18/2016
OH-FU-016.000-ROW	2558.30	9/7/2016	9/29/2016
OH-FU-017.000-ROW	3189.70	9/7/2016	9/29/2016
OH-FU-018.000-ROW	2,531.60	4/5/2016	8/10/2016
OH-FU-019.000-ROW	2684.40	9/2/2016	10/27/2016
OH-FU-021.000-ROW	359.60	9/30/2016	11/28/2016
OH-FU-022.000-ROW	2659.60	10/7/2016	Provisions Only
OH-FU-027.000-ROW	1,451.90	8/22/2016	9/29/2016
OH-FU-028.000-ROW	1,285.40	8/8/2016	8/22/2016
OH-FU-029.000-ROW	527.60	7/11/2016	8/22/2016
OH-FU-038.000-ROW	1,363.00	11/4/2015	2/12/2016
OH-FU-039.000-ROW	2961.80	8/31/2016	9/26/2016
OH-FU-040.000-ROW	1,126.80	10/28/2015	11/11/2015
OH-FU-042.000-ROW	2,785.20	8/18/2016	10/13/2016
OH-FU-043.000-ROW	892.60	2/22/2016	8/25/2016
OH-FU-044.000-ROW	1,926.70	2/22/2016	9/10/2016
OH-FU-045.000-ROW	779.00	2/6/2016	8/10/2016
OH-FU-047.000-ROW	1,325.90	2/22/2016	8/25/2016
OH-FU-049.000-ROW	1,326.70	2/22/2016	8/9/2016
OH-FU-050.000-ROW	664.10	9/30/2016	
OH-FU-051.000-ROW	1804.20	8/29/2016	9/2/2016
OH-FU-053.000-ROW	345.10	2/12/2016	8/10/2016
OH-FU-054.000-ROW	569.30	2/12/2016	8/10/2016

Tract ID	Easement Length (Feet)	Drainage Tile Agreement Issued Date	Drainage Tile Agreement Executed Date
OH-FU-055.000-ROW	567.30	2/12/2016	8/10/2016
MI-LE-004.000-ROW	1,071.00	1/18/2016	1/29/2016
MI-LE-007.000-ROW	1,221.22	7/8/2016	8/26/2016
MI-LE-014.500-ROW	378.97	10/19/2016	
MI-LE-016.000-ROW	2,875.26	10/19/2016	
MI-LE-017.000-ROW	2633.88	11/10/2016	12/29/2017
MI-LE-018.000-ROW	2,644.63	10/19/2016	
MI-LE-019.000-ROW	3,112.34	10/19/2016	
MI-LE-020.000-ROW	1,617.44	8/26/16	9/21/2016
MI-LE-020.000-ROW	1,617.44	6/15/2016	6/27/2016
MI-LE-021.000-ROW	1,828.72	7/20/2016	12/7/2016
MI-LE-022.000-ROW	1,580.07	7/20/2016	12/7/2016
MI-LE-024.500-ROW	1,656.73	7/20/2016	11/1/2016
MI-LE-025.000-ROW	2,816.59	7/20/2016	8/19/2016
MI-LE-027.000-ROW	449.13	7/25/2016	12/15/2016
MI-LE-029.000-ROW	2,528.00	6/15/2016	6/27/2016
MI-LE-030.000-ROW	3,666.41	6/15/2016	6/27/2016
MI-LE-031.000-ROW	832.87	5/13/2016	6/17/2016
MI-LE-032.000-ROW	704.00	5/13/2016	7/13/2016
MI-LE-033.000-ROW	2,113.65	5/13/2016	7/13/2016
MI-LE-034.000-ROW	2,229.15	5/13/2016	7/13/2016
MI-LE-048.510-ROW	1,754.12	6/15/2016	8/1/2016
MI-LE-055.000-ROW	2,904.85	6/15/2016	6/21/2016
MI-LE-057.000-ROW	2,958.00	6/15/2016	6/27/2016
MI-LE-084.000-ROW	2,805.08	4/5/2016	6/11/2016
MI-LE-087.500-ROW	1,425.91	10/15/2015	10/16/2015
MI-LE-093.000-ROW	2,543.00	9/12/2015	10/2/2015
MI-LE-095.500-ROW	1,346.77	10/6/2015	3/15/2016
MI-LE-096.500-ROW	1,558.91	10/6/2015	3/15/2016
MI-LE-098.000-ROW	1,515.26	10/6/2015	3/15/2016
MI-LE-099.000-ROW	2,774.28	10/6/2015	3/15/2016
MI-LE-108.000-ROW	1,530.90	11/10/2015	3/15/2016
MI-LE-110.000-ROW	1870.68	1/16/2017	1/20/2017
MI-LE-112.000-ROW	783.52	10/12/2015	1/18/2017
MI-LE-112.500-ROW	904.99	10/12/2015	1/18/2017
MI-LE-114.000-ROW	2,745.05	10/12/2015	1/18/2017
MI-LE-115.000-ROW	385.62	3/6/2016	3/15/2016
MI-LE-116.000-ROW	498.13	3/6/2016	3/15/2016
MI-LE-117.500-ROW	2,659.87	11/10/2015	3/15/2016
MI-LE-117.510-ROW	2,092.29	2/5/2016	3/14/2016
MI-LE-121.000-ROW	1,931.74	4/5/2016	3/14/2016
MI-LE-122.000-ROW	1,931.74	2/4/2016	3/14/2016
MI-WA-023.551-ROW	1,963.14	4/5/2016	9/12/2016



<b>Tract ID</b>	<b>Easement Length (Feet)</b>	<b>Drainage Tile Agreement Issued Date</b>	<b>Drainage Tile Agreement Executed Date</b>
MI-WA-050.000-ROW	X		Provisions Only
MI-WA-081.000-ROW	2,254.17	10/19/2015	4/15/2016
MI-WA-081.500-ROW	21.38	10/19/2015	4/15/2016



33. ***Prior to construction***, Rover shall commit to hire local drain tile contractors to install/repair drain tiles that are damaged or need to be rerouted due to construction activities.

**Response:**

Rover will employ local drain tile contractors to conduct the work required to repair or replace to the extent possible. If, during construction, it is not possible to allow local drain tile contractors to work concurrently on the right-of-way, Rover will employ local contractors to advise on and monitor the work conducted on the drain tile.



*34. Upon completion of construction, Rover shall provide information on encountered, severed, and/or damaged drain tile lines to the landowner, the local county Soil and Water Conservation District, and the information shall be kept in the company's landowner records for future reference.*

**Response:**

Rover agrees to comply with Environmental Condition No. 34.

35. ***Prior to construction***, Rover shall file with the Secretary, for review and written approval of the Director of OEP, an impact avoidance, minimization, or mitigation plan for the organic farm at MP MAB 57.8. Rover shall include documentation that the plan was developed in consultation with the landowner.

**Response:**

Rover reviewed the Agricultural Impact Mitigations Provisions (AIMP) for Organic Farms provided by the Ohio Ecological Food and Farm Association. Rover also met with the landowner and his representative on August 24, 2016 to discuss provisions of an agreement. The following is an Impact Avoidance, Minimization, and Mitigation Plan for the organic farm at MP MAP 57.8 derived from the AIMP for Organic Farms and the items agreed to as a result of the meeting.

Organic System Plan

1. Prior to entering the right-of-way, the equipment will be cleaned at a wash station at the edge of the property.
2. Rover will utilize drop cloths below the pipeline segments during welding and coating to collect any residue.
3. Topsoil and subsoil will be segregated and stored on the property. No topsoil or subsoil will be brought in from neighboring properties or purchased and brought in without written consent from the landowner.
4. The landowner would prefer to plant deep-rooted plants rather than allowing Rover to decompact the soil. Rover will compensate the landowner for the expense of the planting to mitigate for not decompacting.
5. The landowner can utilize manure or rock phosphate rather than allowing Rover to apply fertilizer if it is preferred. Rover will compensate the landowner for the expense of the application of manure or rock phosphate to mitigate for not fertilizing.
6. Rover will not allow tobacco to be used by Rover employees and contractors on the property.
7. Per the agreement in discussion with the landowner, Rover will reduce the construction right-of-way to avoid removing the one tree that was proposed to be impacted on the property.
8. Rover will compensate the landowner to reseed the property as preferred.

Prohibited Substances

1. Rover will not apply herbicides, pesticides, fertilizers, or seed unless requested and approved by the landowner.
2. Rover will not allow refueling, fuel or lubricant storage, or routine equipment maintenance on the property.
3. Rover will not store equipment on the property at night during construction.
4. Rover will use special signage to denote the property boundaries, as is done with wetlands and waterbodies, and will note the special status of the property on the landowner line list supplied to the contractor, which includes all special conditions for properties.

Water in Trenches

Rover will install a permanent trench plug where the pipeline enters and exits the property. This will prevent water, and subsequently any minerals or pollutants, from entering or leaving the property via the pipeline trench.

Weed Control

Rover will not utilize herbicides as weed control during maintenance of the pipeline right-of-way on this property. In addition, Rover will not use prohibited substances in weed control on land adjacent to the property in such a way as to allow these materials to drift onto the property.



Monitoring

Rover has committed to having a certified Organic Agricultural Inspector present during construction on the property to ensure that all the required conditions for the property are properly followed.

Compensation for Construction Damages

In the event that construction of the pipeline causes the property to lose its organic status, Rover will be responsible for payment of any lost revenue or benefit for the remaining term of the agreement with the organic certification program and any losses due upon the property not becoming eligible for re-entry into the organic certification program.



*36. **Prior to construction**, Rover shall file with the Secretary, for review and written approval of the Director of OEP, a complete list of all CRP enrolled lands that would be crossed by the Project by milepost. In addition, Rover shall file with the Secretary any revised impact mitigation measures or conservation plans that will be necessary in order to maintain CRP compliance along with confirmation from the FSA that parcels will remain eligible for the program if the specified mitigation is implemented. If parcels will no longer be eligible for enrollment, Rover shall identify how it will compensate landowners for the lost program benefits.*

**Response:**

A list of tracts enrolled in the CRP are enclosed in Table 36 in Enclosure 36. The table is filed under Privileged and Confidential because information concerning tracts enrolled in CRP is not public information.

Rover is coordinating with the landowners of the tracts enrolled in CRP to address any specific mitigative measures necessary to ensure the continued enrollment of the specific tract in CRP. In addition, as part of the easement agreement for these tracts, Rover is committing to compensate the landowner for any lost CRP payments or revenue and any losses occurred if the tract becomes ineligible for re-entry in the CRP due to the Project. Rover does not anticipate these issues, but is committing to them in writing to assuage potential concerns of the landowners.



37. **Prior to construction**, Rover shall file with the Secretary, for review and written approval of the Director of OEP, an impact avoidance, minimization, or mitigation plan for the trails located in the Pinckney Recreation Area. Rover shall include documentation that the plan was developed in consultation with the MIDNR.

**Response:**

Rover is consulting with MIDNR to finalize an easement agreement that takes into account the trails proposed to be crossed by the Project. The Rover Project crosses the Losee Lake Hiking Trail three times, as noted in the FEIS. However, the Project does not cross the Waterloo-Pinckney Hiking Trail, which is within the Waterloo Recreation Area. MIDNR has provided a map (attached as Enclosure 37) identifying the Losee Lake Hiking Trail crossings, which are crossed at the same locations as the “Power Line” (ITC). Although subject to potential changes prior to executing the agreement, it currently contains the following stipulations regarding forest roads and recreational trails.

- (1) Rover shall ensure that MIDNR or its assign's use of existing forest roads and recreational trails crossing or adjacent to the ROW will not be altered or adversely affected by this easement. This shall include, but not be limited to, use by heavy equipment for the harvesting and transportation of timber products. These roads and trails shall remain open and useable both during and after construction/installation, and during any ROW maintenance or abandonment activity unless written authorization is provided by the MIDNR Representative.
- (2) All trails located within the right-of-way shall be restored to pre-construction grades and surfacing, as near as practical, in accordance with Grantee’s approved FERC (“Federal Energy Regulatory Commission”) plans and procedures.
- (3) Forest roads and recreational trails used by Rover or its assigns under the terms of this easement, shall be left in as good or better condition as they were before their use.
- (4) MIDNR retains its right to develop and use the easement area in a manner that is consistent with its mission as outlined in Part 5, Section 503 of Act 451 of 1994 as amended, and are not inconsistent or interfere with the purpose or use of this easement. This includes the right to develop, use and maintain new forest roads and new recreational trails which may be adjacent to, include and/or cross the ROW.
- (5) Rover shall supply, install, maintain, and replace (as necessary) a sign on the hiking trail to enhance the area of the trail that will be cleared. Sign design, construction, content and location must be pre-approved by the MIDNR Representative prior to installation.

In addition, the agreement currently states that during operation of the pipeline, Rover may close forest roads and recreational trail crossings in emergency situations for up to 24 hours without approval of the MIDNR Representative. Emergency closures of more than 24 hours require the written approval of the MIDNR Representative. Rover will submit any changes to the agreement prior to construction if they occur.

*38. Prior to construction of Mainline Compressor Stations 1 and 3, Rover shall file with the Secretary revised visual screening plans for these compressor stations that incorporate a second row of Colorado blue spruce and adopt a spacing of 20 feet or less between the trees in each row.*

**Response:**

Please find enclosed the revised Visual Screening Plans for Compressor Stations 1 and 3. Although FERC requested a second row of Colorado blue spruce, the Ohio State Historic Preservation Office (Ohio SHPO) requested a more diverse visual screening plan including multiple species and multiple layers. The Ohio SHPO referenced an Ohio Department of Transportation screening plan as an example. Rover has designed the attached visual screening plan based on that example, using the same species with similar arrangement.

The revised visual plans alternate northern red oak and Norway spruce in offset rows on 20-foot centers, with serviceberry and redbud alternating between the larger trees. The plan now includes three rows, with the vegetation overlapping. The larger trees will provide the foundation for the screen, with the smaller flowering shrubs softening the look of the screen and providing seasonal color. As shown in the previous versions of the figures, small gaps in the tree rows will be necessary where access roads, pipelines, or other utilities prevent trees from being planted.

Further, Rover requested a driveway permit for Compressor Station 1 from the Carroll County Engineer's Office, who requested a shift in the location of the driveway to improve vision on the top of the hill for safety reasons. Rover has complied and further revised the Visual Screening Plan for Compressor Station 1 in Enclosure 38.



39. Rover shall file with the Secretary reports describing any documented complaints from affected landowners that a homeowner's insurance policy was either cancelled or voided due directly to the grant of the pipeline right-of-way or installation of the pipeline and/or that the premium for the homeowner's insurance increased materially and directly as a result of the grant of the pipeline right-of-way or installation of the pipeline. The reports shall also identify how Rover has mitigated the impact. These reports shall be included in Rover's weekly construction status reports and in its quarterly reports **for a 2-year period following in-service of the Project.**

**Response:**

Rover agrees to comply with Environmental Condition No. 39.



40. Rover shall not begin implementation of any treatment plans/measures (including archaeological data recovery); construction of facilities; or use of staging, storage, or temporary work areas and new or to-be-improved access roads **until**:

- a. Rover files with the Secretary:
  - i. the Ohio SHPOs' comments on Ohio archaeological and architectural survey reports;
  - ii. the Michigan SHPO's comments on the Michigan final report, addendum 1 and 2 reports, and avoidance plan for 11 sites;
  - iii. the West Virginia SHPO's comments on the revised West Virginia survey report;
  - iv. the Pennsylvania SHPO's comments on the additional architectural information requested in its April 13, 2015 letter;
  - v. all outstanding cultural resources survey/testing reports and any required evaluation reports, and the SHPOs' comments on the reports;
  - vi. any necessary treatment plans or site-specific protection plans, and the appropriate SHPO's comments on the plans;
- b. the ACHP is provided an opportunity to comment if historic properties would be adversely affected; and
- c. the FERC staff reviews and the Director of OEP approves all cultural resources survey reports and plans, and notifies Rover in writing that treatment plans/mitigation measures may be implemented or construction may proceed.

## **Response**

The response to this Environmental Condition was filed with FERC on November 8, 2016. Additional information regarding Section 106 of the National Historic Preservation Act was filed with FERC on September 27, 2016 and October 12, 2016. A copy of these submittals is enclosed electronically.



*41. Rover shall not begin construction of project facilities until FERC staff concludes its resolution of adverse effects as they relate to the Stoneman House, in compliance with section 106 of the National Historic Preservation Act.*

**Response:**

Rover agrees to comply with Environmental Condition No. 41.



42. Rover shall file in the **weekly construction status reports** the following for each HDD entry and exit site:

- a. *the noise measurements from the nearest NSA for each drill entry/exit site, obtained at the start of drilling operations;*
- b. *the noise mitigation that Rover implemented at the start of drilling operations; and*
- c. *any additional mitigation measures that Rover would implement if the initial noise measurements exceeded an Ldn of 55 dBA at the nearest NSA and/or increased noise is over ambient conditions greater than 10 decibels.*

**Response:**

Rover agrees to comply with Environmental Condition No. 42.



43. Rover shall file a noise survey with the Secretary **no later than 60 days** after placing each of the Rover Pipeline Project compressor stations in service. If a full load condition noise survey of the entire station is not possible, Rover shall instead file an interim survey at the maximum possible horsepower load and file the full load survey **within 6 months**. If the noise attributable to the operation of all of the equipment at any compressor station under interim or full horsepower load conditions exceeds 55 dBA Ldn at any nearby NSAs, Rover shall file a report on what changes are needed and shall install the additional noise controls to meet the level **within 1 year** of the in-service date. Rover shall confirm compliance with the 55 dBA Ldn requirement by filing a second noise survey with the Secretary **no later than 60 days** after it installs the additional noise controls.

**Response:**

Rover agrees to comply with Environmental Condition No. 43.



44. *Prior to construction, Rover shall file with the Secretary, for the review and written approval of the Director of OEP, a construction coordination plan that identifies the specific construction measures (such as retention of the same contractor, re-use of equipment bridges, coordinated installation of erosion control devices, or restoration commitments) that Rover and Columbia Gas Transmission System, LLC have agreed to implement in the construction of the parallel portions of their respective projects in the non-exclusive easement.*

**Response:**

Rover and Columbia Gas Transmission, LLC (Columbia) have entered into a Master Joint Use and Maintenance Agreement addressing the construction and operation of the Seneca Lateral and Leach XPress Pipeline projects where the pipelines will be constructed in close proximity to each other. This agreement is attached in Enclosure 44 as Privileged and Confidential.



*45. Prior to construction, Rover shall revise the route alignment on tract OH-ST-024.000 (Terrance Lahr property) as shown on page 3 of Mr. Lahr's October 5, 2016 filing; or, develop, in coordination with Mr. Lahr, a mutually agreeable site- specific parcel access plan that accommodates temporary and permanent vehicular access to the Lahr property.*

**Response:**

Rover has amended the route as directed by FERC, as depicted in the alignment sheets included as Enclosure 4a. Rover made adjustments to the route suggested by FERC on the tract to the west (OH-ST-025.000) per the landowner's request subsequent to the changes made on OH-ST-024.000.