



ROVER PIPELINE
An ENERGY TRANSFER Company

November 9, 2015

Kimberly Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: Rover Pipeline LLC
Docket No. CP15-93-000
Request for Expedited Commission Approval and Schedule Recovery

Dear Ms. Bose,

Rover Pipeline LLC (“Rover”) hereby respectfully requests that the Federal Energy Regulatory Commission (“Commission”) grant Rover’s Natural Gas Act (“NGA”) Section 7(c) certificate application in the above referenced docket by no later than the second quarter of 2016 so that Rover may commence construction of the Rover Pipeline Project (the “Rover Pipeline”) by no later than June or July 2016. Granting certificate authorization within this timeframe will enable Rover to maximize consideration of environmental and agricultural factors, along with constructing during summer and fall months when conditions are less harsh and more favorable to workers. Furthermore, it will enable Rover to address the take-away transportation capacity needs of its producer shippers, many whose production is currently shut in and significantly bottlenecked, to Defiance, Ohio no later than January 2017, and to the Vector Pipeline by mid-2017.

Rover initiated the Commission’s pre-filing process in June 2014, and subsequently submitted an application under NGA Section 7(c) in the above-captioned docket on February 20, 2015 (“Application”). During the pre-filing process, Rover delayed filing its certificate application beyond its intended submittal date of January 20, 2015, based upon the Commission staff’s request for additional time for informal review of the draft resource reports under the pre-filing process. Rover accommodated this request, expecting that this additional review time would result in a more predictable and efficient certificate review and approval process. To the best of its knowledge, Rover has provided all necessary information to assist the Commission staff in preparing a robust Draft Environmental Impact Statement (“EIS”) and is committed to expediting the issuance of a Final EIS by responding promptly to any new issues raised in comments as well as all recommendations offered in the Draft EIS. While Rover is aware of the staffing constraints within the Commission, Rover respectfully submits that two years is a sufficient period of time for the preparation of an EIS and review of a project that will solve a large portion of the transportation constraints facing the Marcellus and Utica production regions.

Given the sensitivity and difficulty of certifying and constructing projects in the Ohio River Valley Region, Rover had anticipated starting construction as late as May 2016. In balancing

various environmental and agricultural considerations, Rover's construction plan included starting construction in non-forested areas in May or June of 2016, and then starting construction in forested areas in August of 2016. This was specifically designed to avoid construction in the months of June and July, which are the most sensitive nesting season for migratory birds and to protect the various threatened or endangered bat species' most sensitive reproductive period.

As it stands today, the Marcellus and Utica production regions are severely constrained by a lack of take-away pipeline capacity (as evidenced by the numerous pipeline certificate applications seeking authorization to construct facilities in those regions that are currently under Commission review), which is resulting in production curtailments, shut-in production, significant sub-market pricing structures in certain areas and an overall destabilization of the region. The Rover Pipeline, along with certain other proposed pipelines, is an essential and critical debottlenecking solution that producers and domestic consumers are relying upon to move gas from the production region to various markets. In short, Rover's initial start-up service to Defiance, Ohio will move well over 1.6 bcf/d of production and that number will steadily increase up to 3.25 bcf/d as the upstream producers connect their production systems to the Rover Pipeline. To the best of Rover's knowledge, this initial start-up volume is unprecedented in the natural gas marketplace and demonstrates the extreme take-away capacity needs of these producers. It is essential that Rover come on line by January 2017, to meet this market demand. Failure to obtain a certificate in time to meet this schedule will be detrimental not only to Rover, but also will be devastating to the natural gas markets in the region for the 2016/2017 winter and spring/summer 2017 gas markets demands and needs.

Moreover, construction of the Rover Pipeline must commence by June or July of 2016, to maximize consideration of significant environmental factors and take advantage of more favorable working conditions for construction workers and activities during the summer months in West Virginia, Pennsylvania, Ohio and Michigan. For example, one very significant concern of Rover regarding winter construction is the potential adverse impact to agriculture lands – impacts that both Rover and the landowners very much want to avoid. In this regard, when the ground freezes it becomes very difficult to segregate top and sub soil with much accuracy. As a result, top and sub soil mixing occurs, which could result in negative impacts, including reduced crop yields and loss of soil fertility. Additional impacts likely to occur include increased soil compaction and an inability to properly de-compact the soil due to frozen conditions. Finally, right-of-way restoration also will be adversely impacted by winter construction and will require an intermediate winter stabilization step and more extensive spring construction and clean-up.

Potential adverse impacts resulting from winter construction are not limited to impacts to agricultural lands and right-of-way restoration, but rather, include safety factors relating to the construction workforce, the public, and landowners. Construction during very cold, icy, or frozen weather conditions may contribute to an increase in the chance of accidents – both construction accidents and vehicular accidents by construction personnel and landowners and stakeholders in the vicinity of construction activities. These adverse impacts can be greatly minimized by commencing construction in the summer months of June or July of 2016.

In summation, any delay beyond the second quarter of 2016 in receiving a Commission order authorizing the Rover Pipeline Project will jeopardize Rover's ability to complete the work necessary to place its facilities into service in the safest and most environmentally sensitive and timely manner. In this regard, a delay beyond the requested approval date likely will extend Rover's construction timeline for up to an additional year and will similarly strand Marcellus and Utica production for the same period of time. As such, granting authorization for the proposed facilities within the requested timeframe is in the public interest.

For the reasons discussed above, Rover respectfully requests that the Commission grant the requested authorization by no later than the second quarter of 2016.

Respectfully submitted,

/s/ Joey Mahmoud
Joey Mahmoud
Senior Vice President, Engineering
Energy Transfer Partners, L.P.

cc:

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