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October 29, 2007

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First St., N.E., Room 1A
Washington, DC 20426

Dear Secretary Bose:

I am writing to you on behalf of my father, Raymond Parks, of 3896 S SR 63, Hillsdale, IN 47854, who is a landowner in Vermillion County, Indiana. Recently, he received a letter from your office, Reference Docket No. CP07-208-000, regarding notification of a revision in the proposed Rockies Express-East Pipeline Project by Rockies Express Pipeline, LLC (Rockies Express). The proposed pipeline would run through his property in Vermillion County. He was asked to comment on this project as you prepare an environmental impact statement (EIS) for it. Our input on this with respect to potential environmental effects, reasonable alternatives, and measures to avoid or lessen environmental impact is as follows:

Potential Environmental Effects:
The most direct and immediate environmental effect is that due to topsoil disturbance and potential loss particularly in the permanent easement area. The proposed route will cut through productive farm ground used to produce corn and soybeans. Topsoil, which has formed over thousands of years, is the thin veneer on the earth's surface that provides the primary base for productive crop growth. It is only the topsoil, overlaying the subsoil that can provide the available nutrients, water holding capacity and supporting organic matter to support crop growth. The underlying subsoil does not have the necessary nutrients, organic matter, or proper soil structure (i.e., soil aggregate properties, % pore space for air & water movement) to adequately support crop growth. The pipeline construction process can permanently destroy this topsoil unless adequate steps are taken. Even with careful steps to minimize damage, some damage is inevitable.

Furthermore, damage to neighboring topsoil in the temporary easement area along the route can be damaged by heavy equipment causing compaction damage and leaving exposed soil subject to erosion loss, which again, can hinder productive crop growth.

Construction of the pipeline will expose uncovered soil to the potential for wind and water erosion during the construction and recovery process.

Pipeline construction could encounter established field drainage tile lines and disturb drainage flows through the field.

Reasonable Alternatives:
One alternative is to avoid cropland areas as much as possible with the proposed route and/or to follow existing routes of current pipelines.

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Measures to avoid or lessen environmental impact:

1. Do pipeline construction during times of less rainfall to minimize soil compaction and erosion.
2. Minimize vehicle and equipment travel along the exposed route to minimize soil compaction.
3. Carefully remove topsoil of the permanent easement area and set to the side prior to excavation. The depth of the removal necessary will have to be determined carefully as conditions change along the route so as to not mix subsoil with topsoil. Keep equipment off that set aside topsoil during the construction process. Place topsoil back over the pipeline area when construction is completed.
4. Be sure to assess where existing drainage tile lines are located and stay at least one foot or more away from such existing lines.
5. Take steps to minimize soil erosion during and immediately after construction. This may require spreading a layer of straw and/or some structures to slow water flow rates in certain areas.

Thank you for allowing us to comment and express our concerns regarding this project as you go forward in preparing the EIS.

Please contact me if you have any questions.

Sincerely,

James S. Parks
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