

FILE

**OFBF Self-Help Energy Programs**

Administered by the Ohio Farm Bureau Development Corporation  
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January 14, 2008

Kimberly D. Rose, Secretary  
 Federal Energy Regulatory Commission  
 888 First Street NE, Room 1A  
 Washington, DC 20426

Docket Number: CP07-208-000

Attention: GAS BRANCH 2

Reference to: REX East Project Draft Environmental Impact Statement (EIS) Comment

Dear Ms. Rose:

I would like to thank the Federal Energy Regulatory Commission (FERC) for the opportunity to submit comments concerning the Rockies Express (REX) East Draft Environmental Impact Statement (EIS) as distributed by the agency in November 2007.

The Ohio Farm Bureau Federation (OFBF) agrees with FERC's analysis and conclusions as detailed in Section 5.1.1 of the agency's draft EIS concerning the need for this construction project. As discussed in our comments concerning Docket PF06-30-000 dated September 28, 2006, OFBF realizes that the REX Pipeline project can help several major public utilities across Ohio access additional, as possibly more cost-effective, natural gas supplies.

The project can help thousands of energy consumers. It provides an opportunity where large-scale agribusinesses (green house operators, grain elevators and food processors) eligible to use General Transportation Service tariffs can work with energy service providers to access additional gas supplies. Moreover, farm, small business and residential energy consumers could use customer choice tariff provisions to accomplish the same objective.

The REX project provides a unique opportunity, not available through existing energy markets and available pipeline infrastructure, where utilities and customers can enhance strategies to control their energy costs.

Along with the analysis detailed above, OFBF is pleased with FERC's work with REX to address how this construction project will directly impact landowners and/or rural residents in 14 counties throughout southern Ohio.

OFBF agrees with FERC's analysis and many of its conclusions as detailed in Section 4.8.2 and Appendix I concerning agricultural land repair and remediation standards. Many draft EIS provisions closely reflect our need for an on-going process where REX, local SWCDs and landowners could work together effectively to address issues concerning soil and water quality starting with pre-construction and continuing long-term after the project is completed.

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To further enhance this process, OFBF asks that FERC consider the following modifications to its recommendations as detailed in Section 5.2 of the draft EIS:

- **Recommendation 47 – Agricultural Wet Weather Contingency Plan:** OFBF supports adding a provision where the designated Agricultural Construction Inspector has the ability and authority to stop work in the event of damage over and above that detailed in the final draft of this EIS.
- **Recommendation 48 – Identification of Seeps, Springs and Water Wells:** OFBF supports adding the identification of installed and approved Soil and Water Conservation Practices (Example – Special Grassed Waters, Terracing, Rock Shutes, Specialized Tile Outlet Structures and other USDA – approved conservation construction practices) that support special soil conservation and water quality needs.
- **Recommendation 98 – Creation of a Post-Construction Monitoring Plan:** OFBF supports adding provisions whereby periodic inspection and repair is maintained after the initial five-year period. Starting in year six, special inspections leading identification of further need for repair and action should be continued every three – five years through the lifetime of the project.
- **Recommendation 102 – Minimum Pipeline Depths In Agricultural Soils:** OFBF supports a provision whereby the pipeline should be buried at a minimum depth of five feet in all ground currently used for an agricultural purpose, regardless of its identification as a USDA "Prime Soil" or not.

We look forward to working with local farmers, county SWCDs, REX and FERC to ensure that many Ohio communities gain better access to cost-effective supplies of natural gas without sacrificing soil and water quality and the specific needs of impacted farmers and rural residents.

Thank you for your time and consideration.

Sincerely,

 **Dale R. Arnold**

Dale R. Arnold  
Director, Energy Services, OFBF

CC: John C. Fisher, Executive Vice President, OFBF  
Keith Stimpert, Senior Vice President, Public Policy, OFBF  
Robert Vance, Senior Vice President, Corporate, OFBF  
Adam Sharp, Senior Director, National & Regulatory Affairs, OFBF  
Larry Gearhardt, Senior Director, Local Affairs, OFBF  
Brad Ross, Chief Executive Officer, Ohio Federation of SWCDs  
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Submission Contents

OFBF Comments on REX East Draft EIS Docket Number CP07-208-000	
OFBFREXDocketCP07208000.pdf.....	1-2
OFBF Comments on REX East Draft EIS Docket Number CP07-208-000	
OFBFREXDocketCP07208000.pdf.....	3-4