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January 14, 2008

Kimberely D. Bose, Secretary
Federal Energy Regulatory Commission
Office of Energy Projects
888 First Street, N.E., Room 1A
Washington, D.C. 20426

RE: Central Illinois Pipeline Association
Protest and Objections re: Rex-East Draft Environmental Impact Statement
Central Illinois Pipeline Association, Macon County, Illinois

PUCO

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Docket No. CP07-208-000

Dear Secretary Bose:

This law firm has been retained by the Central Illinois Pipeline Association (hereafter "CIPA") to represent its land interests relating to the Rockies Express East Pipeline Project (hereafter "REX").

CIPA objects to Federal Energy Regulatory Commission's ("hereafter "FERC") Draft Environmental Impact Statement (hereafter "DEIS") for the REX project. CIPA specifically and without limitation objects to the impact that the DEIS has on its members and other similarly situated property owners. These concerns include but are not limited to the presence of a fast-track timeline, the blatant disregard for archeological/environmental issues and testing in Macon County, the unsettled and incomplete discussion of alternative routes, and the deficient nature of the Mitigation Plan considering conflicting statements from right of way agents.

Fast Track Timeline

CIPA objects to the proposed FERC timeline, which to our understanding allows REX to begin installing pipe before completing all necessary environmental studies. After reviewing FERC and REX documentation, it appears that FERC intends to issue the final EIS prior to the survey completion. It is CIPA's contention that without the completion of suitable surveys and appropriate time for review of survey reports, FERC will not be able to adequately and legally consider the Pipeline's impact on the environment, specifically to Macon County, Illinois. CIPA is not convinced that a fast track timeline is either necessary or mandatory with regard to the proposed pipeline.

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Oversight of Land Issues

As mentioned in previous filings with this Commission, many of the CIPA members were without notice of the initial filings REX completed including any time sensitive response dates. REX did not fairly nor amply notify CIPA members of the proposed route and the effect it will have upon their land in adequate time to object to the route.

Multiple members own land in which there are active development transactions (Garrett land), current development plans (Circle Z Development land) or abut neighboring development land (Ridgley and Jacobs land). REX is in possession of the current plots for the respective parcels. Obviously, the presence of the pipeline on such parcels will greatly hinder if not destroy the development plan and vision. CIPA would like such concerns and impact addressed by REX prior to any final resolution to install the pipeline.

To date REX is actively attempting to complete agricultural and archeological surveys on members land (Wells, Corman, Circle Z Development and Garrett properties). It is unclear what the surveys will reveal until the completion of the studies. CIPA questions the "hurried" and "expedited" manner in which REX would like to complete this initial stage of the construction of the pipeline without considering the archeological and environmental impact the pipeline will have on non-surveyed land. Members of CIPA continue to become concerned regarding the great amount of pipe being delivered to neighboring towns, prior to their land being surveyed.

Further, completed archeological surveys on members land (Monfre) revealed "some sort of Indian artifacts" according the REX officials. However, the identity of such artifacts have been withheld from members. CIPA believes it would only be fair to such members to have knowledge of such artifacts prior to moving forward.

Proposed Alternative Routes

REX's overall attitude invokes the feeling that they will transect Macon County regardless of the association members concerns. REX has made it perfectly clear that if they fail to reach some sort of agreement with CIPA members, they will get the members respective land by means of eminent domain. This is all with or without the findings of the archeological surveys or suggestion of alternative routes.

This association as well as the County Board of Macon County and the Village of Mt. Zion has submitted proposed alternative routes to REX. It is our further contention that those routes should be considered prior to moving forward with any final decision that will affect the members' respective land. CIPA members have been in continuous contact with REX concerning proposed routes for several months. Each discussion regarding proposed alternative routes inevitably concludes with REX stating they will "take the alternative route to management for review." However, it is unclear to CIPA members and counsel exactly who "management" is nor do they make it clear whether the proposed route will be considered within the given time frame. The proposed routes

by all three aforementioned entities are consistent and if accepted will not conflict with each other.

Mitigation Plan

Members of CIPA have been provided with dissimilar proposed Mitigation Plans from multiple Right of Way Agents. These Agents have provided conflicting information from what is written within the proposed mitigation plan. It is unclear which version of the mitigation plan members should rely upon. Varying information ranges from mandatory field cover, selection of field tile repair professionals, supervision and inspection of the installation of the pipeline to the clean up and removal of the project and equipment. In short, CIPA has not been provided with consistent answers to any questions proffered regarding the Mitigation Plan. It strongly suggests that FERC prolong any final decision until consistent answers are provided and an acceptable mitigation plan submitted.

Conclusion

CIPA requests the governance of FERC to ensure that their interests are protected. CIPA in no way opposes interstate commerce, nor the existence of the pipeline. In fact CIPA is very interested in working with FERC and REX to provide a solution that works for all interested parties. However, CIPA requests that their stated objections to the DEIS and with REX be considered in your decision. Finally, CIPA requests adequate time for responding to REX proposals and statements, in order for their respective interests to be protected.

If the Commission and/or any respective Commissioner's have any questions, please contact our firm. We are committed to working with REX in a professional and diligent manner.

RESPECTFULLY SUBMITTED,

BOLEN ROBINSON & ELLIS, LLP

BY: /s/ KRISTIN M. ZACHEIS
ON BEHALF OF THE CENTRAL
ILLINOIS PIPELINE ASSOCIATION

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