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February 7, 2008

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FEDERAL ENERGY
REGULATORY COMMISSION

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

RE: Docket No. CP07-208-000
Rockies Express Pipeline LLC, REX-East Project
Supplemental Information For Crossing of the Big Walnut Creek

Ms. Bose:

On April 30, 2007, Rockies Express Pipeline LLC ("Rockies Express") filed with the Federal Energy Regulatory Commission (FERC or Commission) an application pursuant to Section 7(c) of the Natural Gas Act and Part 157 of the Commission's regulations, requesting a Certificate of Public Convenience and Necessity authorizing the construction and operation of an approximately 639-mile-long natural gas pipeline and related facilities.

In its January 14, 2008 response to Environmental Mitigation Measure 61 ("EMM 61") of the draft Environmental Impact Statement ("EIS"), Rockies Express committed to conducting further studies at Big Walnut Creek ("Big Walnut") to determine the feasibility of completing a successful horizontal directional drill ("HDD") of the waterbody. Based on the results of these studies, Rockies Express has determined that the Big Walnut can be successfully crossed using HDD technology and, therefore, is adopting the HDD method at this location.

The election to cross the Big Walnut by HDD is consistent with the preferences of state and federal environmental agencies. Specifically, the Indiana Dept. of Environmental Management, along with the National Park Service, have indicated that they would prefer that Rockies Express cross the Big Walnut by HDD, or a by a dry or trenchless crossing technique. Consistent with this preference, and as noted above, Rockies Express is electing to cross the Big Walnut by HDD. Rockies Express files the following supplemental information with respect to the HDD crossing of Big Walnut Creek:

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Technician *[Signature]* Date *2-8-08*

- An updated response to EMM 61 of the draft EIS regarding Big Walnut Creek committing Rockies Express to attempt, as a first option, an HDD crossing of the waterbody (Attachment A; Public);
- site-specific HDD crossing plan for Big Walnut Creek (Attachment B Public);
- Acoustical Assessment of a Planned HDD at Big Walnut Creek (Attachment C; Public), See EMM 147.

Rockies Express is filing an original and seven (7) copies of all Public Information. In addition, Rockies Express is providing complete copies of this filing directly to the FERC Project Manager and third-party contractor. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



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Attorneys for
Rockies Express Pipeline LLC

Attachments

cc: Laura Turner
Karen Fadely, ICF
Trevor Loveday, Entrix
All Parties

Attachment A

**Updated Response to Certificate Condition No. 61
of the Draft Environmental Impact Statement for the REX-East Project**

61. Prior to the end of the draft EIS comment period, Rockies Express shall file with the Secretary site-specific HDD crossing plans for the White River (MP 315.8) and Big Walnut Creek (MP 281.5). If geotechnical feasibility assessments indicate that HDD crossings of the White River and the Big Walnut Creek would not be possible, then Rockies Express shall consult with IDEM and FWS regarding alternative crossing methods and file the results of these consultations with the Secretary along with the geotechnical report. (page 4-38)
-

Rockies Express' Response:

Big Walnut Creek

In its initial response to Certificate Condition No. 61, filed with the Federal Energy Regulatory Commission (FERC) on January 14, 2008, Rockies Express stated that it had performed a detailed geotechnical study of the ground formations at Big Walnut Creek. Because of excessive amounts of gravel and cobbles, which can present a serious risk to an horizontal directional drill (HDD), Rockies Express had determined that this method at Big Walnut Creek would be unsuccessful. Therefore, Rockies Express continued to promote an open-cut crossing of Big Walnut Creek, however, had modified the additional temporary workspaces to reduce impacts on forested land.

Similar to the White River, Rockies Express is aware of and sensitive to the Indiana Department of Environmental Management's and U.S. Fish and Wildlife Service's concerns regarding an open-cut crossing of Big Walnut Creek. Therefore, Rockies Express has continued to evaluate the potential feasibility of an HDD at Big Walnut Creek. Since filing its response, Rockies Express consulted with an experienced HDD contractor, Michels, and provided it with the most recent geotechnical data along with the proposed profile and alignment drawing for the Big Walnut Creek HDD crossing. Based on the information provided, it is now believed that an HDD crossing of Big Walnut Creek can be successfully accomplished. An HDD crossing at this location poses some typical problems such as the difference in elevation, and the threat of ground water infiltration poses a high risk of dealing with substantial amounts of fluid on the low side of the crossing. In addition, the risk of subsidence along the alignment near the entry and exit is a potential hazard, especially with the large diameter ream passes required. Despite these hazards, it is believed that crossing Big Walnut Creek using HDD technology is feasible and, therefore, Rockies Express has adopted this method.

Attached to this response is the site-specific HDD crossing plan for the Big Walnut Creek. Also attached are the results of an acoustical assessment, as requested by Certificate Condition No. 147, of the planned HDD operations at Big Walnut Creek.

Attachment B

LARGE-FORMAT IMAGES

One or more large-format images (over 8½" X 11") go here. These images are available in E-Library at:

For Large-Format(s):

Accession No.: 20080211-0212

Security/Availability:

☒ PUBLIC

☐ NIP

☐ CEII

☐ NON-PUBLIC/PRIVILEGED

File Date: 2/7/08 Docket No.: CP07-208

Parent Accession No.: 20080211-0211

Set No.: 1 of 1

Number of page(s) in set: 1

Attachment C

**HOOPER
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HOUSTON, TEXAS 77082
(281) 496-9876 FAX (281) 496-0016****h&k**

Date of Transmittal: 02/05/08

H&K Job No. 3913

MEMORANDUM (Total of 4 Pages)**Subject: Acoustical Assessment of a Planned HDD at Big Walnut Creek (Putnam County, IN) for the Gas Pipeline associated with REX-East Pipeline Project****Submitted to: Natural Resource Group, Inc. (NRG)****Project Applicant: Kinder Morgan Company****Submitted by: Paul D. Kiteck, P.E., Hoover & Keith Inc. (H&K)****1.0 INTRODUCTION**

The following memo provides the results of an acoustical assessment of planned horizontal directional drilling (HDD) operations at Big Walnut Creek (Putnam County, Indiana) for the natural gas pipeline associated with the **Rockies Express Pipeline (REX) – East Project**. An acoustical assessment for the other planned HDD sites for the project was provided previously in a previous H&K Report¹.

The purpose of the acoustical assessment is to estimate the sound contribution at nearby noise-sensitive areas (NSAs) resulting from drilling operations at each HDD site and present noise control (NC) measures to minimize the noise impact of HDD activities if the analysis indicated that the noise of HDD operations could exceed the "benchmark" sound criterion of 55 dBA (L_{dn}).

2.0 BRIEF DESCRIPTION OF NEW HDD SITE

Figure 1 (p. 3) shows the area layout around the new HDD site (i.e., location, length and entry/exit points) along with the NSAs surrounding the new HDD site. Verification of the NSAs and existing ambient sound levels was determined by H&K during an ambient site sound survey. The following Table A summarizes the planned new HDD site and the observed closest NSA to the entry point and exit point along with the distance and direction of the closest NSA.

General Location of The Planned HDD Construction Site	Entry or Exit Point	Approx. Milepost (MP)	Closest NSA and Type of NSA	Distance & Direction of Closest NSA	Reference Drawing (i.e., Figure)
Big Walnut Creek	Entry	281.5	Residences	2,500 ft. (SW)	Figure 1 (p. 3)
Big Walnut Creek	Exit	281.1	Residences	2,200 ft. (SSE)	Figure 1 (p. 3)

Table A: Summary of the Big Walnut Creek HDD Site and Distance/Direction of the Closest NSAs

¹ H&K Report No. 2095, dated April 17, 2007, to NRG, entitled "REX-East Project: Acoustical Assessment of the Planned HDD Sites...Rockies Express Pipeline-East Project"

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Acoustical Assessment of a new HDD at Big Walnut Creek for the Project

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3.0 ACOUSTICAL ASSESSMENT AND FINAL COMMENT

The same acoustical methodology utilized in the previous H&K noise assessment (RE: H&K Report No. 2095) was employed for the acoustical assessment of this new HDD construction sites. The spreadsheet analyses (calculations) of the estimated A-wt. sound level contributed by HDD operations at the closest NSA for the new HDD construction site are provided in Table 1 (p. 4) and Table 2 (p. 4), and the noise assessment assumes that standard HDD equipment is employed. The following Table B summarizes the estimated A-wt. sound level and calculated L_{dn} (as calculated from estimated A-wt. level) at the closest NSA from the HDD entry site and HDD exit site during peak operation of equipment at the new HDD site.

Location of Each HDD Site	Entry or Exit Point	Distance & Direction of Closest NSA	Added NC Measures to meet Criterion	Calc'd L_{dn} due to HDD (via A-wt.)	Ambient L_{dn}	L_{dn} of HDD plus Ambient	Increase Above Ambient	Reference Table
Big Walnut Creek	Entry	2,500 ft. (SW)	Not required	47.6 dBA	45.0 dBA	48.5 dBA	4.5 dB	Table 1 (p. 4)
Big Walnut Creek	Exit	2,200 ft. (SSE)	Not required	37.8 dBA	45.0 dBA	45.8 dBA	0.8 dB	Table 2 (p. 4)

Table B: Summary of the Est'd Sound Level Contribution and Calc'd L_{dn} at the NSAs closest to the Big Walnut Creek HDD Site, assuming Standard HDD Equipment Utilized.

The acoustical assessment indicates that the noise attributable to the drilling operations at the planned new HDD for Big Walnut Creek should not exceed the "benchmark" sound level criterion of 55 dBA (L_{dn}) at the closest NSAs. The results of the acoustical assessment also indicates the noise due to HDD drilling operations for the Big Walnut Creek HDD site should be below the "benchmark" sound level criterion of 55 dBA (L_{dn}) and should cause less than a 9 dBA increase at the nearby NSAs.

File: WRC\NRG-East Project\HDD Site\Memo - Analysis of Big Walnut Creek HDD site for REX-East.doc

NRG – REX-East Pipeline Project
Acoustical Assessment of a new HDD at Big Walnut Creek for the Project

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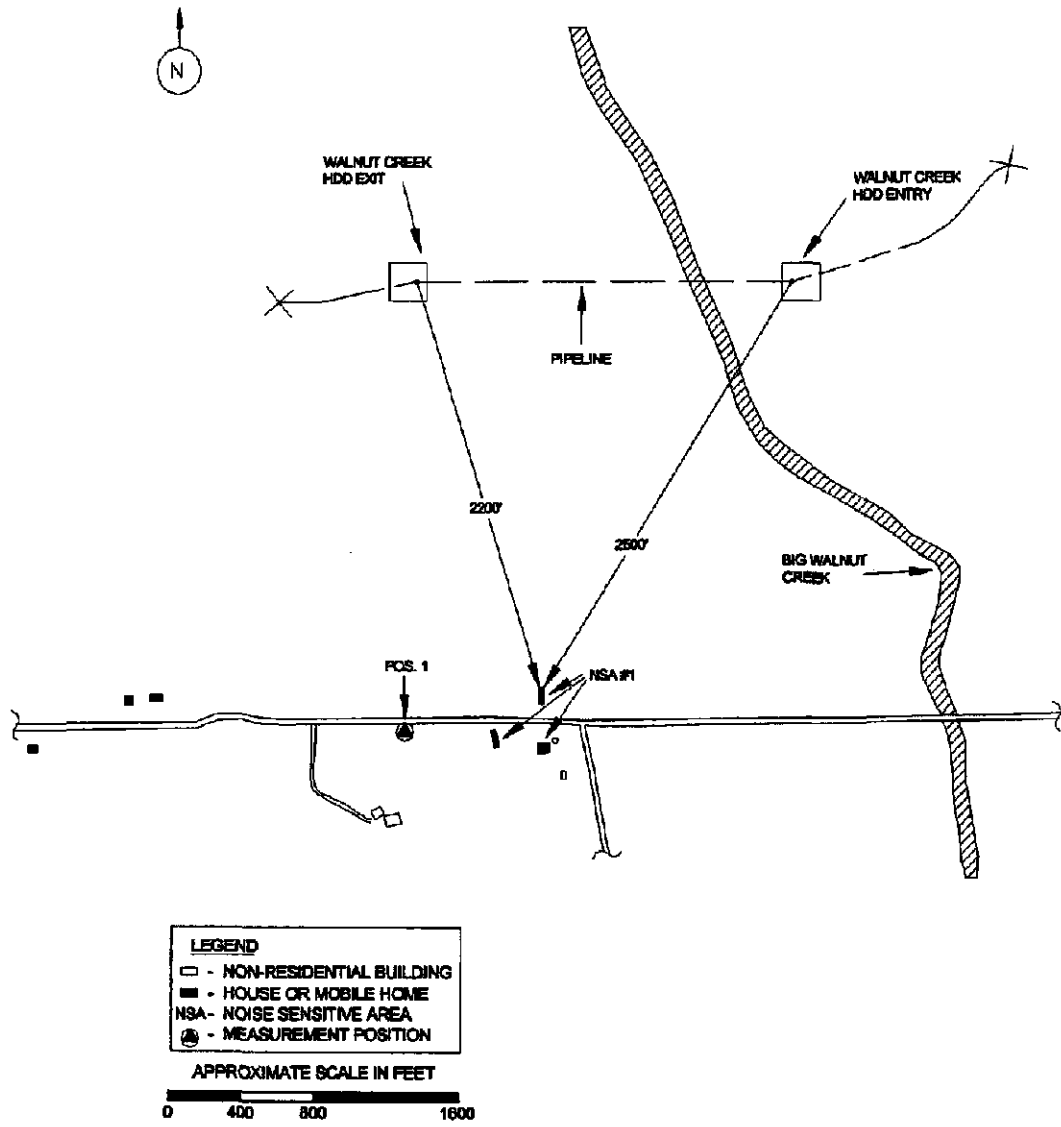


Figure 1: REX-East Pipeline Project: Drawing showing Specific Location of the Big Walnut Creek HDD Crossing along with the Location of the NSAs near the HDD Entry/Exit Point.

NRG – REX-East Pipeline Project
Acoustical Assessment of a new HDD at Big Walnut Creek for the Project

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Dist (Ft) or Calculation	Noise Source and Other Conditions/Factors associated with Acoustical Analysis	SPL or PWL in dB Per Octave-Band Center Freq. (Hz)									A-WL Level
		31.5	63	125	250	500	1000	2000	4000	8000	
	Peak PWL of HDD Operation at an Entry Point	118	115	112	114	112	109	108	106	98	115
	Attenuation by Forest and/or Land Contour	0	0	-1	-2	-4	-5	-6	-8	-8	
2500	Hemispherical Radiation	-66	-66	-66	-66	-66	-66	-66	-66	-66	Calc'd
2500	Atm. Absorption (70% R.H., 60 deg F)	0	0	-1	-1	-2	-5	-10	-20	-35	Ldn
Est'd Total Sound Contribution with No Additional NC		52	49	45	45	40	39	26	12	0	41.2
Measured Ambient Sound Level (i.e., Ldn) in dBA											45.0
Sound Contribution of HDD Noise plus Ambient Level (dBA)											49.5
Potential Increase above the Ambient Level (dB)											4.5

Table 1: REX-East Pipeline Project - Big Walnut Creek HDD (Entry Point Analysis): Est'd Sound Contribution of HDD Operations at Closest NSA to HDD Entry Site (i.e., Residences 2,500 Ft. SW of Entry Point). Assumes Standard HDD Equipment Employed with no Additional Noise Control (NC) Measures.

Dist (Ft) or Calculation	Noise Source and Other Conditions/Factors associated with Acoustical Analysis	SPL or PWL in dB Per Octave-Band Center Freq. (Hz)									A-WL Level
		31.5	63	125	250	500	1000	2000	4000	8000	
	Peak PWL of HDD Operation at an Exit Point	110	108	106	102	100	98	95	92	88	103
	Attenuation by Forest and/or Land Contour	0	0	-1	-2	-4	-5	-6	-8	-8	
2200	Hemispherical Radiation	-65	-65	-65	-65	-65	-65	-65	-65	-65	Calc'd
2200	Atm. Absorption (70% R.H., 60 deg F)	0	0	0	-1	-2	-4	-9	-18	-31	Ldn
Est'd Total Sound Contribution with No Additional NC		45	43	39	34	30	24	16	2	0	31.4
Measured Ambient Sound Level (i.e., Ldn) in dBA											45.0
Sound Contribution of HDD Noise plus Ambient Level (dBA)											45.8
Potential Increase above the Ambient Level (dB)											0.8

Table 2: REX-East Pipeline Project - Big Walnut Creek HDD (Exit Point Analysis): Est'd Sound Contribution of HDD Operations at Closest NSA to HDD Exit Site (i.e., Residences 2,200 Ft. SSE of Exit Point). Assumes Standard HDD Equipment Employed with no Additional Noise Control (NC) Measures.

Notes: Est'd sound power levels (PWLs) of HDD operation based on field tests by H&K on similar type of HDD rigs anticipated for this Pipeline Project. Est'd PWL at HDD exit point should be typically 12 to 14 dB lower than PWL at HDD entry point, noting that there should not be any stationary equipment, such as generators, at the exit point.

End of Memo