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

Docket No. CP07-208-000

Rockies Express Pipeline LLC, REX-East Project

Supplemental Information - Pipe Yards

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DOCKETING DIVISION Public Utilities Commission of Ohio

Ms. Bose:

RE:

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, known as the "REX-East Project." On November 23, 2007, a draft environmental impact statement ("EIS") was issued for the project. Comments on the draft EIS were filed on January 14, 2008.

Comments were filed on the DEIS raising questions regarding the locations where pipe is being stored off right-of-way awaiting a determination by FERC on the pending application. Rockies Express hereby responds to comments to the DEIS with respect to "pipe storage yards."

As the Commission is aware, in today's global competition for steel pipe, pipeline projects such as Rockies Express are required to proceed to purchase and arrange for receipt of pipe to be stockpiled awaiting completion by the Commission of its review of the requested certificates. Pipeline project developers such as Rockies Express must take the financial risk that the pipe it has ordered and purchased will need to be disposed of in the open market if the project is not authorized. But that is a risk in today's global economy.

In light of this modern day commercial reality, pipeline project developers, suppliers of the steel pipe and the transport companies contracted to maintain custody of the pipe must locate pipe storage yards. Recognizing that Rockies Express must avoid disturbance or utilization of facilities subject to review by FERC, Rockies Express worked with its pipe suppliers and the suppliers' transport company, Dun Transportation, to locate and secure appropriate pipe storage yards that are located off of the applied-for right of way or work spaces. The pipe yards are located in logistical proximity to the project but are not on the right of way.

Pipe has been received by rail, ship, through the ports of Toledo, Ohio and along the Gulf Coast. The pipe is then transferred to barge or rail systems for further transport. Thus, some of the storage yards are located some distance from the right of way, such as in Arkansas at the terminus of the river barge transit.

Under the guidelines developed by Rockies Express, Dun Transportation is responsible for securing all of the locations and obtaining, and complying with, all necessary landowner and local governmental authorizations and permits for temporary industrial use as a pipe storage area. Dun Transportation remains in custody of the pipe until it is authorized to be transported and delivered to the right of way after receipt of the certificate of public convenience and necessity and the notices to proceed for a particular work space, staging area or pipeline segment.

Set forth below is a table setting forth the location, land type, and distance from the proposed REX East pipeline route, of each of the pipe transportation yards secured and maintained by Dun Transportation.

#	Location of Pipe Yard (Spread #)	Land Type	Lessee/Owner	Approximate Distance from REX-East Centerline
1	Vandalia, MO - Audrain County (Spread 1)	Agricultural	Dun Transport.	1.5 miles
2	Roodhouse, IL – Greene County (Spread 1)	Agricultural	Dun Transport.	4.9 miles
3	Illiopolis, IL – Christian County (Spread 2)	Agricultural	Dun Transport.	7.1 miles
4	Chrisman, IL – Edgar County (Spreads 2 & 3)	Agricultural	Dun Transport.	0.5 mile
5	Bainbridge, IN – Putnam County (Spread 3)	Agricultural	Dun Transport.	0.4 mile
6	St. Paul, IN – Decatur County (Spread 4)	Industrial	Dun Transport.	2.7 miles
7	Circleville, OH – Pickaway County (Spread 5)	Agricultural	Dun Transport.	l mile
8	Wilmington, OH – Clinton County (Spread 5)	Agricultural	Dun Transport.	2 miles
9	White Cottage, OH – Muskingum County (Spread 6)	Agricultural	Dun Transport.	6.4 miles

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#	Location of Pipe Yard (Spread #)	Land Type	Lessee/Owner	Approximate Distance from REX-East Centerline
10	YARD "A" Derwent, OH - Guernsey County (Spread 7)	Agricultural	Dun Transport.	0.7 mile
11	YARD "B" Derwent, OH - Guernsey County (Spread 7)	Industrial	Bi-Con Services	0.4 mile
12	Ft. Smith, AR MP 302 Arkansas River (Storage Location 1)	Agricultural	Kinder Morgan Terminals	392 miles
13	Maceo, KY MP 751 Ohio River (Storage Location 2)	Industrial	Kinder Morgan Terminals	184 miles
14	Aliquippa, PA MP 16.8 Ohio River (Storage Location 3)	Industrial	Ali Qui PPA Terminals	121 miles
15	Marietta, OH MP 178 Ohio River (Storage Location 4)	Industrial	Marietta Industrial	39 miles
16	Chrisman, IL Edgar County, IL (Storage Location 5)	Industrial	Patrick Construction	1.9 miles
17	Toledo, OH (Storage Location 7)	Industrial	Midwest Terminals of Toledo	166 miles

If a certificate of public convenience of necessity is issued for the REX-East project, each of the contractors responsible for construction on the spreads of the REX East project will establish "contractor yards" for their equipment. The contractor yards are not connected with, or related to, the pipe storage yards, described above. At the contractor yards, which are environmentally cleared as set forth in the Environmental Report for the project, the contractors will, among other things: park buses to transport workers, allow employees to park their vehicles, and store equipment (e.g., backhoes, cranes, excavators, etc.). Thus, unlike the "pipe storage yards," the "contractor yards" will act as staging areas for construction of the pipeline with active ingress and egress.

Respectfully submitted,

J. Curtis Moffatt Shippen Howe Van Ness Feldman, P.C. 1050 Thomas Jefferson St., N.W. Washington, D.C. 20007 (202) 298-1881

Attorneys for Rockies Express Pipeline LLC

Attachments

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