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06-1142-GA-BIN

June 12, 2008

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

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 SECRETARY OF THE
 COMMISSION
 2008 JUN 12 P 2:54
 FEDERAL ENERGY
 REGULATORY COMMISSION

RE: Docket No. CP07-208-000
 Rockies Express Pipeline LLC, REX-East Project
 Supplemental Information

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 (REX-East Project).

Rockies Express hereby files information to supplement its REX-East Project application. Enclosed for filing are the following items:

- SHPO correspondence related to cultural resources (Attachment A) (Public);
- SHPO correspondence related to cultural resources (Attachment B) (Privileged and Confidential); and
- Cultural resources reports, all labeled "Contains Privileged Information - Do Not-Release," including:
 - *Fifth Supplemental Phase I Cultural Resources Survey of the Northeastern Missouri Segment of the Proposed Rockies Express Pipeline-East (REX-East) Project Corridor, Audrain, Ralls, and Pike Counties, Missouri (REX-East-MO-12);*

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- *Supplemental Phase I Archeological Survey (Cloverdale Contractor Yard) for the Proposed Rockies Express-East Pipeline (REX-East) Project-Spread 4 (MP 238.2-MP301.1) Including the Wabash Reroute Vermillion, Parke, Putnam, Hendricks Counties, Indiana (REX-East-IN-39);*
- *Phase II Archeological Evaluation of Sites 33PI952, 33PI896, 33PI959, 33FA1750, 33FA1780, 33PE352, 33PE354, and 33MO77 for the Proposed Rockies Express East Pipeline Project, Pickaway, Fairfield, Perry, and Monroe Counties, Ohio (REX-East-OH-26); and*
- *Phase II Archaeological Investigations Rockies Express East Pipeline Project Spreads 5 and 6, Indiana - Third Mobilization. Decatur, and Franklin Counties, Indiana (REX-East-IN-37).*

Rockies Express is filing an original and seven (7) copies of all Public Information. Also included is one original copy of Privileged information, which has been labeled "Contains Privileged Information - Do Not Release." In addition, Rockies Express is providing complete copies of this filing directly to the FERC Project Manager. If you have any questions, please do not hesitate to contact me.

Respectfully submitted,



Shippen Howe
Mona Tandon
Van Ness Feldman, P.C.
1050 Thomas Jefferson Street, NW
Washington, DC 20007
202-298-1800

Attorney for
Rockies Express Pipeline LLC

Attachments

cc: Laura Turner, FERC
Ellen Saint Onge, FERC
All Parties

**Rockies Express Pipeline LLC
REX-East Project
CP07-208**

ATTACHMENT A

Public

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20 SOUTH EIGHTH STREET
MINNEAPOLIS, MN 55402



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June 9, 2008

Mr. Mark A. Miles, Director
State Historic Preservation Office
P.O. Box 178
Jefferson City, MO 65102

Re: Rockies Express Pipeline-East Project (REX-East) Phase II Testing Results for 7
Sites in Pike County, Missouri
SHPO Log Number: 007-MLT-06

Dear Mr. Miles:

Rockies Express and its subcontractor, i.e., the University of Iowa, Office of the State Archaeologist (OSA), are assisting the FERC in meeting the requirements of Section 106 for the Rockies Express Pipeline-East Project (REX-East) project. The enclosed report presents the results of 6 sites where Rockies Express has completed the Phase II testing and evaluation in Pike County. Excavations at the seventh site (23PI1342) were discontinued due to a number of factors, including floodwaters, likelihood of the site to produce redundant information, and the low frequency of materials recovered from the site during the Phase I testing. The decision to discontinue fieldwork came after discussions with NRG and Missouri SHPO. Based on the results of this testing, OSA has assessed two of the seven sites as eligible for the National Register of Historic Places (23PI1334, 23PI1337).

The report will be submitted to the FERC with the stipulation that it be considered privileged and confidential. The reports are labeled "Contains Privileged Information—Do Not Release," and they will not be made public at any time. The report will be filed with the FERC on June 10, 2008. In addition, copies of the survey results for Missouri have been submitted to the Osage Nation, the Wea Indian Tribe, and to the Iowa Tribe of Kansas and Nebraska, who have asked to be consulted on the project.

If you have any questions or concerns regarding the REX-East project, please contact me by letter at the above address, by telephone at 612-347-7877, or by email at kkrause@nrg-llc.com. We look forward to working with you on this project.

Sincerely,
Natural Resource Group, LLC.

A handwritten signature in cursive script that reads "Karl Krause".

Karl Krause, M.S., R.P.A.
Cultural Resource Manager

Enclosures: (1 hard copy, 1 CD)

Collins, Angele, Maria Tavaszi, and Joe Alan Artz. 2008. *Third Phase II Archaeological Site Assessments in the Northeastern Missouri Segment of the Proposed Rockies Express Pipeline-East (REX-East) Project Corridor, Pike County, Missouri.* Submitted by University of Iowa Office of the State Archaeologist, Iowa City, Iowa.

cc: Elizabeth Dolezal, NRG, Inc.
Charlie Bertram and Jim Thompson, Rockies Express

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MINNEAPOLIS, MN 55403



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June 11, 2008

Mr. Mark A. Miles, Director
State Historic Preservation Office
P.O. Box 176
Jefferson City, MO 65102

Re: Rockies Express Pipeline-East Project (REX-East) Survey – Supplemental
Phase I
SHPO Log Number: 007-MLT-06

Dear Mr. Miles:

Rockies Express and its subcontractor, i.e., the University of Iowa, Office of the State Archaeologist (OSA), are assisting the FERC in meeting the requirements of Section 106 for the Rockies Express Pipeline-East Project (REX-East) project. The enclosed report presents the results of survey completed in May, 2008. Survey during this period covered one Additional Temporary Workspace. One site was identified (23P11399) during survey. OSA is recommending the site as not eligible for listing in the National Register of Historic Places.

The report will be submitted to the FERC with the stipulation that it be considered privileged and confidential. The reports are labeled "Contains Privileged Information—Do Not Release," and they will not be made public at any time. The report will be filed with the FERC on June 12, 2008. In addition, copies of the survey results for Missouri have been submitted to the Osage Nation, the Wea Indian Tribe, and to the Iowa Tribe of Kansas and Nebraska, who have asked to be consulted on the project.

If you have any questions or concerns regarding the REX-East project, please contact me by letter at the above address, by telephone at 612-347-7877, or by email at kikrause@nrg-llc.com. We look forward to working with you on this project.

Sincerely,
Natural Resource Group, LLC.

A handwritten signature in cursive script that reads "Kari Krause".

Kari Krause, M.S., R.P.A.
Cultural Resource Manager

Enclosures:

Collins, Angela. June 2008. *Fifth Supplemental Phase I Cultural Resources Survey of the Northeastern Missouri Segment of the Proposed Rockies Express Pipeline-East (REX-East) Project Corridor, Audrain, Ralls, and Pike Counties, Missouri.* Submitted by the University of Iowa Office of the State Archaeologist, Iowa City, Iowa.

cc: Elizabeth Dolezal, NRG, Inc.
Charlie Bertram and Jim Thompson, Rockies Express



LOG

LOG OF TELEPHONE CONVERSATION

CALL TO/FROM WHOM: David Halpin	PHONE NO.: 217-558-8973
COMPANY: Illinois Historic Preservation Agency (IHPA)	
NRG CONTACT: Kari Krause	PHONE NO.: 612-347-7877
DATE: 06/10/08	NRG OFFICE LOCATION: Minneapolis
RE: Rockies Express - Treatment Plan and MOA	

LOG OF CONVERSATION:

Halpin informed Krause that his agency had contacted Ellen St. Onge of the FERC to determine the status of the Memorandum of Agreement (MOA) for the REX-East project. St. Onge advised Halpin and Anne Haaker of the IHPA that she was still drafting the letter of notification to the Advisory Council of Historic Preservation (ACHP) and that she hasn't started the MOA. Haaker offered to draft the MOA for Illinois that would include the conditions her agency would like included and St. Onge accepted.

One of the conditions to the MOA would be that it is Rockies Express' responsibility to ensure that all cultural material collections recovered from the eligible sites (Phase III sites) would be curated with the state. Typically the IHPA does not sign MOAs if they indicate the collections will be returned to landowners.

Kari Krause

From: Halpin, David [David.Halpin@Illinois.gov]
Sent: Wednesday, June 11, 2008 2:00 PM
To: jrobertson
Cc: Kari Krause
Subject: RE: 11PK1733

Hi Jim:

Thank you for the information about 11PK1718. I'm not sure what was going on that day in the field, but it was quite disturbing. I read the material you sent me and am satisfied with the current interpretation of the site and features.

I read the Phase II for 11PK1733 today, and I must admit that if a mound was not associated with the site I do not believe that any portion of the site should be determined NRHP eligible. The report indicates that only one of the five features located during the testing is positively a prehistoric feature, and that logging has disturbed a portion of the site located within the right-of-way.

Other than 9 sherds of presumed Middle-Late Woodland ceramics were found during the testing, no diagnostic material was located. The Phase III recommendation suggests that I have missed something in the report and I would be happy if we could discuss the site's attributes.

I will be in until 4:00 today, until 12:00 tomorrow (I get to visit a field school with Oneota pottery), and all day Friday.

Thanks:

David J. Halpin
Staff Archaeologist
Illinois Historic Preservation Agency
217-785-4998

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June 9, 2008

Mr. Jim Glass, Deputy SHPO
Division of Historic Preservation & Archaeology
402 West Washington Street
Room W274
Indianapolis, IN 46204

Re: **Rockies Express Pipeline-East Project (REX-East) Phase II Testing Results for
at Six Sites in Vermillion, Parke, and Putnam counties, Indiana
DHPA No. 1582**

Dear Mr. Glass:

Rockies Express and its subcontractor, John Milner Associates, Inc. (JMA), is assisting the FERC in meeting the requirements of Section 106 for the Rockies Express Pipeline-East Project (REX-East) project. The enclosed report covers Phase II testing and evaluation of six sites in Vermillion, Parke, and Putnam counties. Based on the results of this testing effort, JMA has assessed the 12VE583, 12P657, 12PM350, and 12PM356 as not eligible for the National Register of Historic Places (NRHP). Two sites, 12VE586 and 12P652, have been assessed as eligible for the NRHP and recommended that Rockies Express seek ways to avoid affecting the resource, or consider Phase III mitigation.

The report will be submitted to the FERC with the stipulation that it be considered privileged and confidential. The reports are labeled "Contains Privileged Information—Do Not Release," and they will not be made public at any time. The report will be filed with the FERC on June 10, 2008. In addition, copies of the survey results for Missouri have been submitted to the Wea Indian Tribe and to the Iowa Tribe of Kansas and Nebraska, who have asked to be consulted on the project.

Rockies Express would greatly appreciate your comments on this document. I can be reached by telephone at 612-347-7877, by email at kikrause@nrg-llc.com, or by letter at the address above. Thank you for your continuing assistance with this project.

Sincerely,
Natural Resource Group, LLC.



Karl Krause, M.S., R.P.A.
Cultural Resource Manager

cc: Project File
Elizabeth Dolezal, NRG
Charlie Bartram and Jim Thompson, Rockies Express

Enclosure (1 CD and 1 hard copy):

Stevens, J. Sanderson, Joseph Balicki, Patrick Heaton, Charles Cheek, Arron Kotlenaky, Anna Maas, Joel Klein, Cynthia Vollbrecht, Lynn Jones, Sarah Ruch, William Chadwick, and Timothy Lloyd. 2008. *Phase II Archeological Evaluation of Six Sites (12VE563, 12VE588, 12P652, 12P657, 12PM350, and 12PM356) for the Proposed Rockies Express Pipeline - East (Rex East) Project Vermillion, Parke, and Putnam Counties, Indiana*. Submitted by John Milner Associates, Inc., Louisville, Kentucky.

Division of Historic Preservation & Archaeology • 402 W. Washington Street, W274 • Indianapolis, IN 46204-2739
Phone 317-232-1646 • Fax 317-232-0693 • dhp@dnr.IN.gov



June 9, 2008

Kari Krause
Natural Resource Group, Inc.
80 South Eighth Street
Minneapolis, MN 55402

Federal Agency: Federal Energy Regulatory Commission

Re: Fourth mobilization phase II archaeological testing at three sites for spreads 5 & 6 pertaining to the Rockies Express Pipeline LLC's installation of a 622 mile long natural gas pipeline through Illinois, Indiana, and Ohio (FERC Docket #PF06-30-000; DHPA # 1562)

Dear Ms. Krause:

Pursuant to Section 106 of the National Historic Preservation Act (16 U.S.C. § 470f) and 36 C.F.R. Part 800, the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has conducted an analysis of the materials dated May 19, 2008 and received on May 20, 2008, for the portion of the above indicated project in Johnson and Franklin counties, Indiana.

The proposals for the Phase II investigations of sites 12Jo559, 12Fr466, and 12Fr472 are acceptable with the following conditions:

1. All aspects of the archaeological investigation must be directly supervised in the field by an archaeologist meeting the supervisory criteria of 312 IAC 21.
2. Any proposed revisions to the archaeological plan must be submitted in writing to the Division of Historic Preservation and Archaeology prior to implementation in the field or laboratory.
3. If any human remains dating before December 31, 1939 are encountered, the discovery must be reported to the Indiana Department of Natural Resources within two (2) business days. In that event, please call (317) 232-1646. The discovery must be treated in accordance with IC 14-21-1 and 312 IAC 22.
4. A complete report on the scientific investigations must be submitted to the DHPA for review and comment within one year of the completion of fieldwork.
5. This plan is non-transferable.

With these conditions, the proposed plan is acceptable, and the archaeological investigations may proceed. A copy of this letter, along with proper identification, should be carried by archaeologists in the field. This will ensure minimal confusion should they be requested to produce proper identification in the field by law enforcement personnel.

A copy of the revised 36 C.F.R. Part 800 that went into effect on August 5, 2004, may be found on the Internet at www.achp.gov for your reference. If you have questions about archaeological issues please contact Cathy Draeger at (317) 234-3791 or cdraeger@dnr.IN.gov. In all future correspondence regarding the above indicated project, please refer to DHPA #1562.

Very truly yours,

James A. Glass, Ph.D.
Deputy State Historic Preservation Officer

JAG:CLD:old

enc: Thomas Chadderton, The Louis Berger Group

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June 11, 2008

Mr. Jim Glass, Deputy SHPO
Division of Historic Preservation & Archaeology
402 West Washington Street
Room W274
Indianapolis, IN 46204

Re: Rockles Express Pipeline-East Project (REX-East) Supplemental Phase I Survey
of the Cloverdale Contractor Yard
DHPA No. 1562

Dear Mr. Glass:

Rockles Express and its subcontractor, John Milner Associates, Inc. (JMA), is assisting the FERC in meeting the requirements of Section 106 for the Rockles Express Pipeline-East Project (REX-East) project. The enclosed report covers supplemental Phase I survey of the Cloverdale Contractor Yard. No artifacts or archaeological sites were found during this survey period, and as a result, no additional work is recommended for the Cloverdale Contractor Yard.

The report will be submitted to the FERC with the stipulation that it be considered privileged and confidential. The reports are labeled "Contains Privileged Information—Do Not Release," and they will not be made public at any time. The report will be filed with the FERC on June 12, 2008. In addition, copies of the survey results for Missouri have been submitted to the Wea Indian Tribe and to the Iowa Tribe of Kansas and Nebraska, who have asked to be consulted on the project.

Rockles Express would greatly appreciate your comments on this document. I can be reached by telephone at 612-347-7877, by email at kkrause@nrg-llc.com, or by letter at the address above. Thank you for your continuing assistance with this project.

Sincerely,

Natural Resource Group, LLC.

A handwritten signature in black ink that reads "Karl Krause". The signature is fluid and cursive.

Karl Krause, M.S., R.P.A.
Cultural Resource Manager

cc: Project File
Elizabeth Dolazal, NRG
Charlie Bertram and Jim Thompson, Rockies Express

Enclosure (1 CD and 1 hard copy):

Stevens, J. Sanderson, Jeremy Davis, and Timothy Lloyd. 2008. *Supplemental Phase I Archeological Survey (Cloverdale Contractor Yard) for the Proposed Rockies Express-East Pipeline (REX-East) Project-Spread 4 (MP 238.2-MP301.1) Including the Wabash Reroute Vermillion, Parke, Putnam, Hendricks Counties, Indiana.* Submitted by John Milner Associates, Inc., Louisville, Kentucky.

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June 11, 2008

Dr. David Snyder
Archaeology Reviews Manager
Ohio Historic Preservation Office
567 East Hudson Street
Columbus, OH 43211-1030

Re: Rockies Express Pipeline-East Project (REX-East) Survey Results – Phase II
Report for Eight Sites in Pickaway, Fairfield, Perry, and Monroe Counties, Ohio
FERC Docket No. CP07-208-000

Dear Dr. Snyder:

The Rockies Express Pipeline-East Project (REX-East) project will be approximately 639.1 miles in length and will cross portions of Missouri, Illinois, Indiana, and Ohio. The enclosed cultural resources report is in support of Rockies Express Pipeline Company's, L.L.C. (Rockies Express) application to the Federal Energy Regulatory Commission (FERC) under Section 7(c) of the Natural Gas Act (15 USC 717) and is intended to provide a portion of the information required by the FERC to comply with Section 106 of the National Historic Preservation Act.

The enclosed report covers Phase II evaluation of eight sites in Pickaway, Fairfield, Perry, and Monroe counties, Ohio. Based on the results of this recent testing, RCGA has advised that sites 33PI896, 33PI959, 33FA1750, 33FA1780, 33PE352, and 33PE354, be recommended ineligible for the National Register of Historic Places (NRHP). RCGA recommends that two out of the eight sites (33PI952 and 33MO77) be recommended eligible for the NRHP.

The report will be submitted to the FERC with the stipulation that it be considered privileged and confidential. The report is labeled "Contains Privileged Information—Do Not Release," and they will not be made public at any time. The report will be filed with the FERC on June 12, 2008. In addition, copies of the survey results for Ohio will be submitted to the Wea Indian Tribe and to the Iowa Tribe of Kansas and Nebraska, who have asked to be consulted on the project.

If you have any questions or concerns regarding the REX-East project, please contact me by letter at the above address, by telephone at 612-347-7877, or by email at klkrausa@nrg-llc.com. We look forward to working with you on this project.

Sincerely,

Natural Resource Group, LLC

Handwritten signature of Karl Krause in cursive script.

Karl Krause, M.S., R.P.A.
Cultural Resource Manager

Enclosures: (1 hard copy and 1 CD)

cc: Elizabeth Dolazal, NRG;
Jim Thompson and Charlie Bertram, Rockies Express

Reference:

Hornum, Michael B. and Benjamin Riggle. 2008. *Phase II Archeological Evaluation of Sites 33PI982, 33PI696, 33PI959, 33FA1750, 33FA1780, 33PE352, 33PE354, and 33MO77 for the Proposed Rockies Express East Pipeline Project, Pickaway, Fairfield, Perry, and Monroe Counties, Ohio.* R. Christopher Goodwin & Associates, Inc, Fredrick, Maryland.



LOG

LOG OF TELEPHONE CONVERSATION

CALL TO/FROM WHOM: Cathy Draeger	PHONE NO.: 317-234-3791
COMPANY: Division of Historic Preservation & Arch. – IN DNR	
NRG CONTACT: Kari Krause	PHONE NO.: 612-347-7877
DATE: 06/11/08	NRG OFFICE LOCATION: Minneapolis
RE: Rockies Express – REX-East: travel lane	

LOG OF CONVERSATION:

Draeger advised me that she had completed the review of the letter requesting clearance on the disturbed portions of the Cloverdale contractor yard. Krause informed her that JMA had completed the Phase I survey on the remainder of the yard and that the report will be mailed today. Could Draeger wait and comment on this report before sending the letter? Draeger agreed and would try to finish it this week, but the travel lane issue is taking priority. Draeger stated again that she would prefer the MOA be signed before REX begin any work or use of any facility in the state, but understood that the FERC would have the final say on the matter.

Draeger stated that she had received the Letter of Agreement sent by REX that requests expedited review and clearance of areas identified during construction. Draeger is not comfortable allowing the construction on any areas prior to her review of the test results because REX could be adversely affecting something before a treatment is agreed upon by all parties. The SHPO would have to decide on this matter.

Krause asked if Draeger could expedite her review of LGB's Phase I report and Phase II work plan that were recently submitted. REX is pushing their construction schedule up and we need to get the final Phase II site testing completed by July. Draeger said she would try but it is a matter of priority and some things take precedence over others. For example, the issue of the travel lane has been brought to the fore-front again.

Draeger stated that her office has been requested by the Deputy Director of the IDNR to reconsider the use of the travel lane. REX has made an argument with directly with his office that the travel lane, and the engineering information concerning compaction, has no different effects than what a farmer would cause to a site. Therefore, Draeger has been reviewing the three sites in the treatment plan to determine the best location for a possible travel lane. She has also been considering additional fieldwork – prior to the Phase III – that could be done in the travel lane location to determine if there are features that could possibly be affected. These options include: 1) remote sensing and intensive surface collection; 2) test units to ground truth the remote sensing findings; and 3) additional Phase II testing specifically in the travel lane location.

Krause asked how the clearance process would work because any or all of the additional work could push back the start date on the data recovery, or acceptance of the treatment plan and MOA. Krause stated that timing is still a concern because by the time a management summary or Phase II report is written and reviewed, the data recovery on the site could have been completed.

Draeger understood and stated that she was leaning toward requesting remote sensing and surface collection be done now. The archeologists could then send the information immediately and there wouldn't be any delay in the process. She could request in the MOA for consultation on travel lane placement.

Specific examples for travel lane placement included the northern edge through 12DE772 and 12FR336, and the adjacent highway for 12FR337 if IDNR spoke with DOT about easing restrictions for the pipeline vehicles. She wanted to speak with LBG about 12FR310 as well as JMA with some of their most recently identified eligible sites. Krause asked for marked-up copies of the site maps to determine if Draeger's travel lane placements are feasible for construction.

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REGULATORY COMMISSION

Rockies Express Pipeline LLC
REX-East Project
CP07-208

ATTACHMENT B

Contains Privileged Information –
Do Not Release



Rockies Express Pipeline

June 10, 2008

Ms. Anne Haaker
Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
#1 Old State Capitol Plaza
Springfield, IL 62701-1507

Re: Kinder Morgan Pipeline Energy Partners, L.P.
Rockies Express East Pipeline Project (REX-East)
IHPA Log Number: 004061506
Travel Lane

Dear Ms. Haaker:

Rockies Express Pipeline LLC (Rockies Express) proposes to construct and operate a natural gas pipeline, compression, and ancillary facilities to transport natural gas produced in the Rocky Mountain basins for delivery primarily to other pipelines and distribution customers located in the upper Midwest and Eastern United States. The project, referred to as the Rockies Express-East (REX-East) Project, will consist of approximately 639.1 miles of new pipeline facilities in Missouri, Illinois, Indiana, and Ohio, and various associated aboveground (i.e., compressor and meter stations) and ancillary facilities. Pending approval from the Federal Energy Regulatory Commission, Rockies Express proposes to commence construction of the REX-East Project in late June of 2008.

As described in more detail below, Rockies Express seeks the assistance of Illinois Historic Preservation Agency (IHPA) in maintaining REX-East's construction schedule by allowing the use of a travel lane across some of the archaeological sites. This would allow Rockies Express to meet its in-service date, while at the same time fulfilling the project's Section 106 obligations.

The cultural resources surveys undertaken to date for the REX-East Project have significantly increased the database of information on the history of the state of Illinois. Rockies Express has identified 481 cultural resources during the Phase 1 survey of the Illinois portion of the REX-East Project. Phase 2 testing will be completed at 58 of these sites. Data recovery will be conducted on at least 9 of these archaeological sites.

Rockies Express is pursuing a process of phased identification and evaluation and intends to prepare two treatment plans for the project. Six historic properties that require data recovery were included in the first Illinois treatment plan. A second treatment plan will then be submitted later this summer, following the conclusion of the identification and evaluation process. In addition, Rockies Express recently submitted an additional Phase 2 report in early June of 2008 and, will submit a subsequent Phase 2 report in July of 2008.

Ms. Anne Haaker
June 10, 2008
Page 2

As noted above, Rockies Express intends to begin construction in late June of 2008. The excavations of the six data recovery sites in the first treatment plan will not be completed until early August, while the data recoveries of the sites in the second treatment plan will be completed at some point later in the summer. In addition, Rockies Express anticipates that several of the Phase 2 sites will not be accessible, since the review of the reports containing these sites will not be completed by the end of June. Therefore, Rockies Express will not be able to construct across these sites until the data recoveries and the reviews of the Phase 2 reports have been completed.

Much of the route of the REX-East Project in Illinois is located adjacent to other utilities. Rockies Express has obtained permission from these utilities to use a portion of their existing disturbed easement as a travel lane. However, the remaining portion of the pipeline route in Illinois is not collocated with other utilities. In order to maintain its construction schedule, Rockies Express is seeking permission from the IHPA to establish a travel lane across the data recovery (Phase 3) sites and Phase 2 sites along non-collocated portions of the route that will not be cleared for construction by the end of June of 2008 (Table 1).

Currently, two (11PK1771 and 11MG423) of the Phase 3 sites are located in a non-collocated areas. Due to the timing of completion of fieldwork and reporting, these sites will need to be included in second treatment plan and will not be cleared until September of 2008. In addition, Rockies Express anticipates that at least four Phase 2 sites will not be accessible as well, since the review of the reports containing these sites may not be completed until September 2008. Therefore, Rockies Express will not be able to construct across these areas for up to eight weeks after the start of construction.

The construction right-of-way at the Phase 3 data recovery sites will measure 100 feet in width (see figure 1). The topsoil will be removed from 75 feet of the 100 foot construction corridor; the topsoil will not be removed from the remaining 25 feet of the construction right-of-way. Rockies Express initially is proposing to use this 25 foot-wide area as a travel lane while the data recoveries are in progress (i.e. prior to construction in the area). A similar travel lane will be used to cross the Phase 2 sites until the review of the outstanding Phase 2 reports has been completed. The travel lane will be maintained for any of the remaining Phase 2 sites that are determined eligible for listing in the National Register of Historic Places and will require Phase 3 data recovery.

As depicted in figure 1, this travel lane would measure approximately 25 feet in width and would be located on the working side of the construction corridor. The travel lane would be covered with two layers of 7.5-inch thick, 4-foot-wide by 20- to 25-foot-long wooden mats. The wooden mats would be set into place by a loader with a mechanical arm (see figure 2). The mats would be laid in succession without the loader or any other equipment actually driving across the surface of the archaeological sites.

The data recovery efforts would focus on the portion of the sites outside of the matted area. Following completion of the data recoveries, the matted area would be utilized for topsoil storage. After the topsoil is removed, the mats would be removed by the loader utilizing the same procedure in reverse as when they were installed.

Ms. Anne Haaker
June 10, 2008
Page 3

As discussed in more detail below, Rockies Express does not believe that the construction activities within the matted area will have an adverse effect on this portion of the sites. The topsoil will not be stripped from this area and the mats should afford adequate protection from the limited vehicular traffic that will cross the sites.

Rockies Express is aware that soil compaction produced by the use of the travel lane would be of concern to the IHPA. In regards to crew safety, the following steps will be implemented to ensure the safety of the archaeological field crews:

- temporary safety fencing will be maintained across the travel lane at the ingress and egress of sites and along the edge of the travel lane;
- construction crew chiefs will approve vehicle passage and will inform the archeological field crew chief with advanced notice of the use of the travel lane;
- archaeologists will not work within 15 feet of the travel lane when vehicles are crossing the site; and
- construction equipment passing through the site will be restricted to slow speeds (less than 10 mph).

In regards to compaction, Rockies Express' proposed use of timber mats for the travel lane will result in less than or comparable impact on the underlying soils as created by typical farm equipment and, therefore, is not expected to have a detrimental effect on the cultural resources. The following scientific and engineering discussion supports this conclusion.

Soil compaction is caused by the weight of equipment as well as the soil moisture at the time of crossing. Farm equipment that crosses these fields can weigh when loaded with materials (e.g., manure sprayer, large hay baling equipment) comparable to the weight of the pipe laying equipment. Rockies Express has reviewed the soils crossed at the archaeological sites, and has found that about half of the soil types are not prone to compaction potential and half of the soil types are prone to some compaction potential (see table 2).

Compaction is related directly to soil properties of moisture content and texture. Maximum compaction occurs when fine-textured soils (generally thought of as loams and finer soils) are trafficked and when moisture contents are near field capacity. Dry and wet soils are generally not compactable due to their moisture content. Dry soils have stable inter-particle contacts that are not lubricated with water and generally have great loading strength. Wet (saturated) soils have their pores filled with water, which is an incompressible fluid similarly resulting in greatly lowered compaction.

Soil compaction is also related to vehicle load-characteristics such as tire or track ground pressure (in pounds per square inch (PSI) and axle weight (total vehicle weight divided by the number of axles). The greatest amount of compaction is observed just under the tires where the applied loads are greatest. Compaction decreases with depth as the load is distributed through progressively greater volumes of soil.

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Research has shown that farm operators can implement several strategies to limit compaction in agricultural land. These strategies include avoiding tillage and traffic when the soil is wet (Hughes, et al., 2001), limiting the weight of machinery axel weight (Duiker, 2004), and employing tracked vehicles and low pressure tires to minimize ground pressures exerted by the equipment. Tire pressures of 10 PSI or less are generally associated with only surface compaction (Voorhees, 2005).

Compaction has the potential to disturb fragile artifacts such as ceramics by increasing loading pressure in the soil to the point where in-place shearing and fractures in the material can occur (though contextual information is unaffected). The majority of the archaeological sites in question are located in cultivated fields that experience regular farm equipment traffic that occurs at the time when the soils are most sensitive to compaction. In addition, farming practices typically will disturb cultural materials at least down to the plow layer depth, which is typically 4 to 8 inches. Chisel plowing and ripping to decompact compacted soils will disturb soils from 12 to 14 inches.

In order to avoid adverse impacts on more fragile cultural materials, construction occurring in farmed fields should limit compaction and disturbance to less than that experienced by the soils under normal management practices. According to the literature, compaction will be limited to the surface and will be similar to that experienced under normal farm operations when ground pressures are kept to 10 PSI or less, and the soil is trafficked when dry. If the soil is trafficked when dry, even compaction sensitive soils will be unaffected by compaction (Dejong-Hughes, 2001).

Pipeline construction results in regular heavy equipment traffic. Compaction associated with pipeline construction has been extensively documented. However, methods exist that, though expensive, can be shown to limit ground pressures to less than the recommended 10 PSI ground pressures which limit compaction. Data collected by Anthony Hardwood Composites, Inc. for the REX-East Project indicates that if equipment traffic occurs during dry periods on timber mats with large surface areas, maximum ground pressures can be limited to less than 10 PSI (see figure 3). Under these circumstances, the adverse effects of compaction on buried cultural material will not be greater than that experienced during normal farming practices.

To ensure that compaction effects on sensitive cultural materials are avoided, Rockies Express will implement the following procedures across these designated sites:

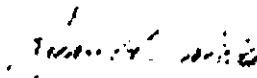
- traffic will only be allowed in the travel lane on staggered, double layers of 20-25 foot wide timber mats; and
- traffic will be limited to dry periods.

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Rockies Express believes that the use of a travel lane across the archaeological sites listed in table 1 will not have a detrimental effect on these resources. The weight of the construction vehicles crossing the sites will be the same as that of common farm equipment. Given that the majority of the sites where the travel lane is required are located in agricultural fields, the impacts on the sites from the use of the travel lane will be equivalent to the current land use in these areas.

Please feel free to contact me by phone at (307-760-5635) or by email at (Ryan_Childs@kindermorgan.com) if you have any questions.

Sincerely,



Ryan Childs
Environmental Project Manager, contractor for
Rockies Express Pipeline LLC

Enclosures:

Table 1	Illinois Eligible and Phase 2 Sites That Will Not Be Cleared by June 30, 2008
Table 2	Site and Soil Characteristics Table
Figure 1	Construction Method for Eligible Sites Not Adjacent to Another Pipeline - 75 ft Area of Disturbance
Figure 2	Construction Method for Travel Lane - Non-Collocated with 75 ft Area of Disturbance
Figure 3	Emtek Matt Bearing Pressure Data

cc: Jim Thompson, Rockies Express Pipeline LLC
Seth Mitchell, Rockies Express Pipeline LLC
Kari Krause, Natural Resource Group, LLC.

References

Dejong-Hughes, J., J.F. Moncrief, W.B. Voorhees, and J.B. Swan. 2001. Soil compaction, effects and control. University of Minnesota Extension Service FO-03115. St. Paul.

Duiker, S. 2004. Avoiding soil compaction. CAT UC186. The Pennsylvania State University, College of Agricultural Sciences, Agricultural research and Cooperative Extension, University Park, PA.

Voorhees, W.B. 2005. The What, How, and So-What of Soil Compaction. Unpublished Mimeo. USDA-ARS North central Soil Conservation Research Laboratory, Morris, MN.

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Table 1: Illinois Eligible and Phase 2 Sites That Will Not Be Cleared by June 30, 2008*				
Site Number	MP	NRHP Eligibility	Report	Anticipated SHPO Clearance
Sites Pending Phase 2 Testing				
11PK1790	51	Unknown	August Phase 2 Report	September 2008
11PK1791	51.5	Unknown	August Phase 2 Report	September 2008
11PK1792	51.5	Unknown	August Phase 2 Report	September 2008
Sites Pending Data Recovery				
11PK1771	51.5	Determined Eligible	Treatment Plan 2 July 2008	September 2008
11MG423	101.85	Determined Eligible	Treatment Plan 2 July 2008	September 2008

*This table only contains the currently known Phase 2 and Phase 3 sites that will not be "cleared" by June 30, 2008. Additional Phase 2 and Phase 3 sites may still be identified.

Table 2
Site and Soil Characteristics

State	County	Section	Soil Series	Soil Type	Soil Description	Soil Color	Soil Texture	Soil Structure	Soil Drainage	Soil Slope (%)	Depth of Occupation (feet)
Illinois											
11PK1790	Pike County, Illinois	Agriculture	8217A	Twomile silt loam, 0 to 2 percent slopes, occasionally flooded	Twomile	1.00	Fine-silty, mixed, active, mesic Typic Albaqualfs	Poorly drained	0.50		100-130
11PK1791	Pike County, Illinois	Agriculture	842BA	Coffeen silt loam, 0 to 2 percent slopes, occasionally flooded	Coffeen	1.00	Coarse-silty, mixed, superactive, mesic Fluvaquentic Hapludolls	Somewhat poorly drained	0.90		35-155
11PK1792	Pike County, Illinois	Agriculture	8331A	Haymond silt loam, 0 to 2 percent slopes, occasionally flooded	Haymond	1.00	Coarse-silty, mixed, superactive, mesic Dystric Fluventic Eutrudepts	Well drained	1.00		35-165
11PK1771	Pike County, Illinois	Wooded / Agricultural (corn)	856G	Stookey and Timula soils, 35 to 60 percent slopes	Stookey	0.63	Fine-silty, mixed, superactive, mesic Typic Hapludalfs	Well drained	47.50		0 (surface) - 196
11MG423	Morgan County, Illinois	Pasture	333	Wakeland silt loam, 0 to 2 percent slopes	Wakeland	1.00	Aeric Fluvaquents, coarse-silty, mixed, nonacid, mesic	Somewhat poorly drained	1.00		210 - 260

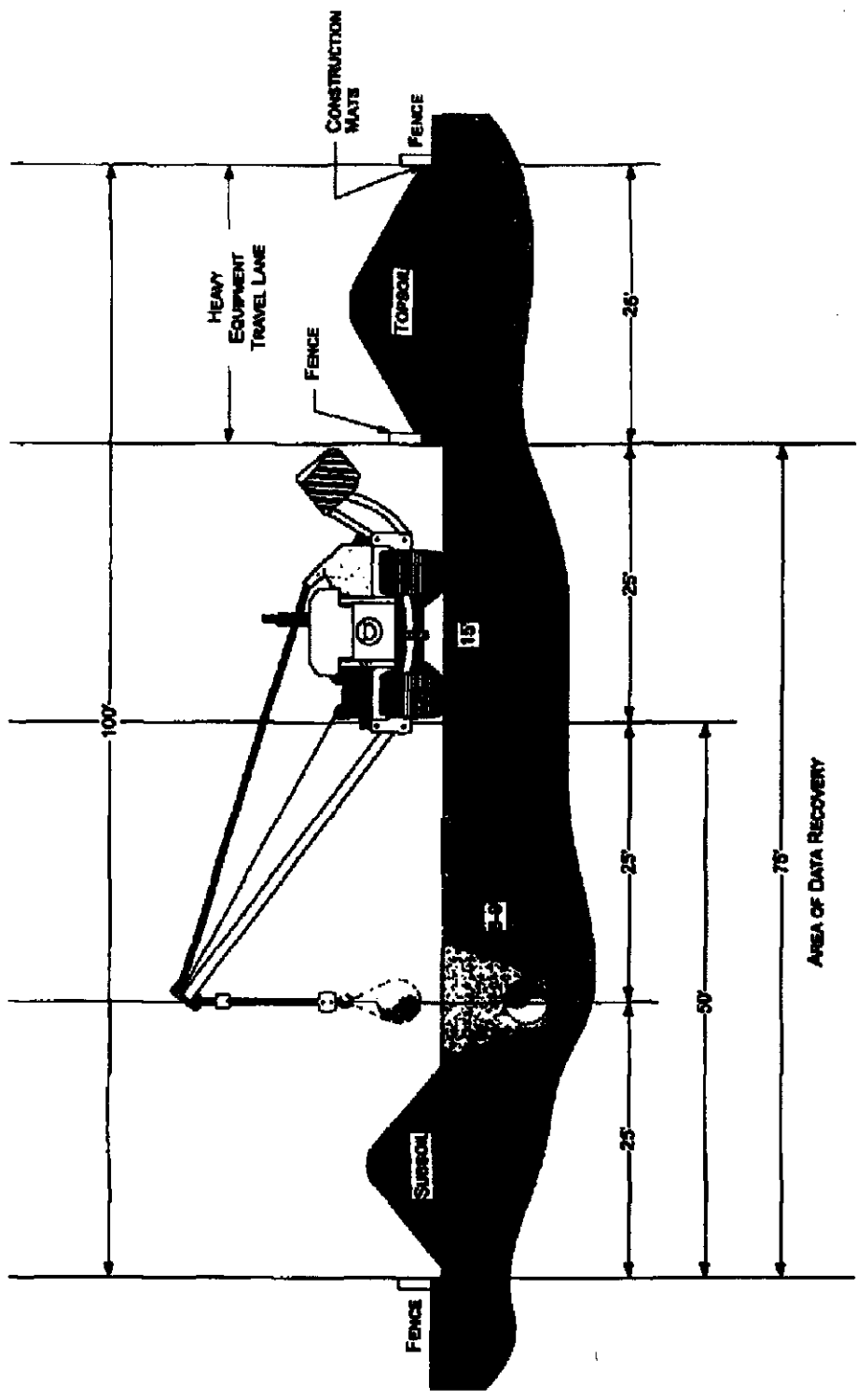


FIGURE 1
ROCKIES EXPRESS PIPELINE - EAST PROJECT
CONSTRUCTION METHOD FOR ELIGIBLE SITES NOT ADJACENT TO ANOTHER PIPELINE
75 FOOT AREA OF DISTURBANCE



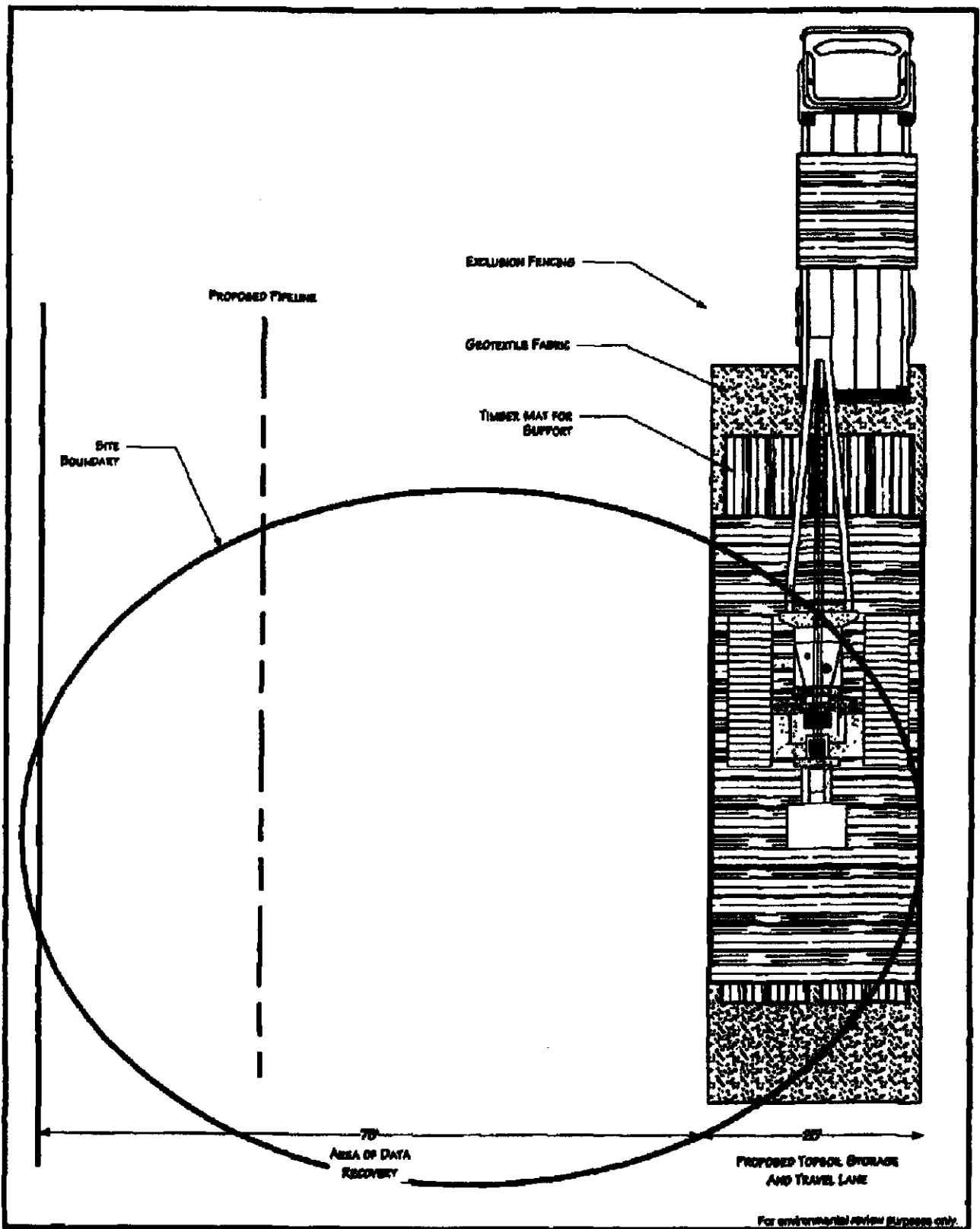


Figure 2
Rockies Express Pipeline - East Project
Construction Method for Travel Lane
Non-Collocated with 75 Foot Data Recovery

DATE: 3/21/2008

REVISED: 6/10/2008

SCALE: NTS

DRAWN BY: KJA3361

4/20/2008 08:00:00 TRAVEL_LANE_FINAL_T011.VSD

Figure 3

From: Jon Fiutak (jfiutak@anthonycomposites.com)
 Sent: Wednesday, March 26, 2008 11:56 AM
 To: mryan@gie.com
 Cc: qmat2000@aol.com
 Subject: Emtek Mat Bearing Pressure
 Attachments: Gulf Interstate Engineering MRyan 032808.pdf; Emtek Design Guide.pdf

Marilyn,

My mat recommendation for your 10 psi ground pressure restriction under a Cat 587T is two layers of 7.5" x4'x28' or 30' Emtek 31F mats. You could probably get away with one layer, but the soil condition likely has variations that would give you localized high pressure points with one layer. This recommendation is based on the information you provided and our analysis. Please call with any questions.

I attached the analysis which is based on a 1' wide mat so don't be alarmed by the numbers. This is based on our Emtek 31F product. The values for this are shown below. There are several assumption that I used that are important to note.

1. The 587T should stay back from the edge of the mats by 5'
2. The max lifting load I used was 130,000 lb for a total weight of 247,000 lb
3. The total weight should be balanced between the two tracks with no wider of a spread than 60/40
4. The soil condition that I used was a subgrade modulus of 4000lb per in of settlement based on the sandy loam soil condition you gave me

emtek Design Properties

$$\left. \begin{array}{l} F_b = 4123 \text{ psi} \\ F_v = 379 \text{ psi} \end{array} \right\} \text{ W/ 1.33 Load Duration Factor}$$

$$E = 1.6 (10)^8 \text{ psi}$$

Unit Section Properties						
No	Size t x b	A in ²	I in ⁴	S in ³	M _A K-Ft	V _A K
1	3.5" x 12"	42	42.875	24.50	8.418	10.612
2	4.5" x 12"	54	91.125	40.50	13.915	13.644
3	5.5" x 12"	66	166.375	60.50	20.787	16.676
4	6.5" x 12"	78	274.625	84.50	29.032	19.708
5	7.5" x 12"	90	412.875	112.50	38.653	22.740

$$A = t(b) \quad I = \frac{bt^3}{12} \quad S = \frac{bt^2}{6} \quad M_A = F_b S \quad V_A = \frac{F_v A}{1.5} \sim \left(\frac{FV \text{ lb}}{Q} \right)$$

K = KIP = 1000 lbs

M_A = Allowable Moment W/1.33 Load Duration Factor

V_A = Allowable Shear W/1.33

Jon C. Fiutak
General Manager
Anthony Hardwood Composites, Inc.
Office (870)942-4000
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Fax (870)942-4040
www.anthonycomposites.com

No virus found in this outgoing message.

Checked by AVG.

Version: 7.5.519 / Virus Database: 269.22.0/1342 - Release Date: 3/25/2008 10:26 AM



LOG

LOG OF TELEPHONE CONVERSATION

CALL TO/FROM WHOM: David Snyder	PHONE NO.: 614-298-2000
COMPANY: Ohio Historic Preservation Office	
NRG CONTACT: Kari Krause	PHONE NO.: 612-347-7877
DATE: 06/11/08	NRG OFFICE LOCATION: Minneapolis
RE: Rockies Express - REX - Great and Little Miami HDD	

LOG OF CONVERSATION:

Snyder called to discuss the management summary for the Great Miami and Little Miami River HDDs. He will concur that the Phase I survey is complete, but he understands that there are five Phase II sites on the Little Miami and the Miami & Erie Canal on the Great Miami that have not received clearance yet. Krause advised Snyder that the HDDs would avoid these sites, and this treatment is clearly addressed in the treatment plan. REX is looking to confirm they have clearance from the SHPO for the Phase I and will not seek start of construction until the after the treatment plan is approved.

Snyder also asked about the Big Darby; he had received a call from another agency concerned with environmental factors on this HDD and was wondering why he hadn't seen a similar request from REX. I stated that REX had requested a Notice to Proceed with FERC for the Big Darby HDD this week, prior to the MOA, because culturally there were no sites or structures that would be affected by the drill.

Snyder advised Krause that he was working on the review of the treatment plan. At this time he did not have any concerns with the proposed fieldwork and methodology; however, he has some questions concerning the post-fieldwork activities. For example, the treatment plan does not clearly specify where the artifacts will go - curated or returned to owner, or the process for the publications. He would likely request a stipulation that called for further consultation with his office during write-up, curation, and analysis activities. Krause asked if a meeting should be scheduled to discuss his questions when he has completed the review and Snyder stated that a conference call would be better.

Kari Krause

From: Kari Krause
Sent: Wednesday, June 11, 2008 5:47 PM
To: 'Draeger, Cathy'
Cc: Jon Berkin
Subject: Rockies Express East - Travel lane
Attachments: image001.gif; IN Travel lane table - eligible and outstanding Phase II sites.doc

Cathy,

After our call today, I worked with Jon Berkin to develop a list of sites that will need a travel lane. The list includes both Phase II where either fieldwork or report/review is pending, and eligible sites. I've attached the table for your review.

Please let me know if I can help with anything, but I think the most useful would be if you could provide a marked-up map showing the locations of where you think a travel lane could be placed.

I will be out of the office on Friday, so if you need help answering any questions, please speak with Jon Berkin (612-359-5674). He has been working closely with REX on the travel lane issue.

Kari



Kari Krause
kkrause@NRG-LLC.com
(612) 347-7877 Direct
(612) 718-6790 Cell
(612) 347-6780 Fax

Table 1: Indiana Eligible and Phase 2 Sites That Will Not Be Cleared by June 30, 2008*				
Site Number	MP	NRHP Eligibility Status	Report	Anticipated SHPO Clearance
Sites Pending Phase 2 Testing/Report Review				
12HE294	296	Unknown	July Phase 2 Report	August 2008
12JO536	322.47	Unknown	July Phase 2 Report	August 2008
12JO559	331.38	Unknown	July Phase 2 Report	August 2008
12FR466	378.64	Unknown	July Phase 2 Report	August 2008
12FR461	386.38	Unknown	July Phase 2 Report	August 2008
12FR333	382.6	Unknown	July Phase 2 Report	August 2008
12FR334	382.7	Unknown	July Phase 2 Report	August 2008
12FR336	393.25	Unknown	July Phase 2 Report	August 2008
12FR472	394.02	Unknown	July Phase 2 Report	August 2008
12FR377	394.28	Unknown	July Phase 2 Report	August 2008
Sites Pending Data Recovery				
12VE586	243.3	Eligible	Treatment Plan 2 July 2008	September 2008
12P652	258.39	Eligible	Treatment Plan 2 July 2008	September 2008
12SH450	340.37	Eligible	Treatment Plan 2 July 2008	September 2008
12DE772	364.11	Eligible	Treatment Plan 1 May 2008	August 2008
12DE745	372.17	Eligible	Treatment Plan 2 July 2008	September 2008
12FR338	393.77	Eligible	Treatment Plan 1 May 2008	August 2008
12FR310	395.75	Eligible	Treatment Plan 1 May 2008	August 2008

*This table only contains the currently known Phase 2 and Phase 3 sites that will not be "cleared" by July 1, 2008. Additional Phase 2 and Phase 3 sites may still be identified.