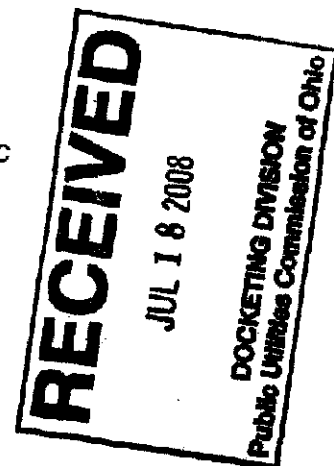


06-1142-GA-BIN



July 15, 2008

Ellen Saint Onge
Federal Energy Regulatory Commission
888 First Street, NE
Washington, DC 20426

RE: Rockies Express Pipeline-East (REX-East) Travel Lane in Indiana.
Docket No. CPO7-208-000

In response to your email of June 6, 2008, Rockies Express Pipeline LLC (Rockies Express) is providing site specific information regarding the two sites in Indiana where a travel lane has been requested. The data on the travel lane in Ohio will be provided in a separate letter. This information was prepared by Rockies Express' cultural resource consultant in Indiana, The Louis Berger Group, Inc. In addition, the letter also provides a response to your question regarding the effects of the travel lane on agricultural fields. Rockies Express believes that the use of a travel lane will not result in significant soil compaction.

At this time, Rockies Express has determined that a travel lane will only be necessary across two of the data recovery sites in Indiana (12SH448 and DE772). Each site is discussed below.

Site 12Sh448

Site 12Sh448 is a historic period archaeological site, probably a residence or small farmstead occupied for a relatively short period of time during the early to mid-1800s. The site was abandoned prior to 1880, perhaps due to its proximity to the Big Blue River and susceptibility to flooding or general deterioration of the buildings. More than 700 historic period artifacts were recovered, including a variety of 19th century ceramics, architectural materials (brick, nails, etc.), window and bottle glass, faunal remains, and a variety of small finds. Features associated with this historic period component include one hearth or fire pit (Feature 2) and one historic refuse pit (Feature 3).

Investigations to date at the site identified an area of high artifact density and cultural features along the north edge of the site area that is likely to yield additional cultural features related to the historic occupation (Figure 1). This area lies between the two central trenches and extends from the vicinity of features identified in the trenches, north to the edge of the proposed REX-East pipeline corridor. Site deposits almost certainly extend farther north, outside the proposed pipeline right-of-way. Based on testing results, archaeological deposits at Site 12Sh448 extend to a depth of approximately 60 centimeters (two feet) below the ground surface. The upper 30 centimeters (12 inches) of site deposits has been disturbed by agricultural plowing.

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The north-central portion of the site exhibits higher artifact density both at the surface and in subsurface test results. In contrast, the southern part of the site in general, and the location of the travel lane in specific, has a low artifact density. As such, archaeological features are not expected in that portion of the site. Soils at the site include Nineveh loam and Ross silt loam (Appendix A). Nineveh series soils do not exhibit susceptibility to compaction due either to wetness or to the soil texture. Ross series soils exhibit susceptibility to compaction due to the texture, but wetness is not a compaction issue. Therefore, the proposed location of a travel adjacent to the southern boundary of the construction corridor should result in negligible impact to potential archaeological deposits.

Site 12De772

Site 12De772 is a medium-sized habitation/tool production locus that includes Late Archaic, Late Woodland, and Mississippian occupations. One thousand three hundred sixty-seven prehistoric artifacts were recovered during Phase I and Phase II investigations, primarily from the 10-20 centimeter (4-8 inch) level of the site. Three prehistoric hearth features were identified (Figure 2). Feature 1 yielded carbonized hickory shell and Feature 9 yielded carbonized maize cupule and kernel fragments. Feature 5 was a well defined hearth that yielded a radiocarbon date from the late Late Woodland or Mississippian periods.

Artifacts and cultural features are concentrated in the northeast portion of the site, in an area measuring approximately 30 meters east-west by 25 meters north-south. The clustering of features suggests a food processing area. Approximately 96 percent of the artifacts were recovered from the surface or disturbed plowzone. However, intact portions of cultural features extend below the plowzone to depths between about 55 and 85 centimeters (22 and 33 inches) below surface.

The proposed travel lane skirts the western edge of the site and runs through its southern quarter. In the central part of the site the travel lane will be over the location of Feature 1, and through the eastern part of the site the travel lane runs along the southern edge of collection units that yielded moderate to high densities of artifacts. However, Feature 1 has been fully excavated, and the part of the site through which the travel lane runs appears to have a relatively low potential for containing significant archaeological deposits. Therefore, the proposed location of the travel lane should result in negligible impact to potential archaeological deposits. Soils at the site consist of Williamstown silt loam (Appendix A). This series exhibit susceptibility to compaction due to the texture, but wetness is not a compaction issue for this soil.

Agricultural Impacts

The use of a timber mat travel lane to prevent compaction-induced disruption of sensitive archaeological material will also serve to minimize agricultural compaction. Agriculturally significant compaction is the result of trafficking agricultural land with heavy equipment that has both high axle loads (greater than 10 tons per axle) and

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correspondingly high ground pressures (greater than 10 psi). Ground pressures at this level can result in adverse impacts to soil bulk density, porosity, infiltration and permeability sufficiently to reduce crop yields when the soil is trafficked when wet. This level of compaction needs to be remediated to maintain the productivity of the soils.

Compaction can be reduced to agriculturally insignificant levels if the soils are trafficked when dry or if methods are used to limit the ground pressures by distributing the weight of the wheeled traffic over a large surface area. It is well known that tracked equipment and equipment with large, low pressure tires result in limited compaction when compared to heavy equipment operating on narrow, high pressure tires.

Constructing a timber mat travel lane to prevent compaction-induced disruption of sensitive archaeological material should minimize agricultural compaction to the extent that deep ripping would not be necessary. The heaviest pipeline construction equipment that causes the most severe surface and subsurface compaction is the stringing truck bringing in the steel pipe. Stringing trucks commonly weigh 75,000 to 80,000 pounds, with the weight distributed between 18 tires inflated to pressures of 110 PSI. Thus, ground pressures are on the order of 110 PSI.

If the configuration of the mat road is such, as in the present case, that two parallel lanes of mats are used to distribute the left and right wheels/tracks to separate lanes, the ground pressure produced by common construction equipment will be reduced to well under the 10 PSI commonly thought of as resulting in agriculturally significant compaction that adversely affects yields. Timber mats are 4 by 20 feet in area (11,520 square inches). On a mat road the weight of each truck would be distributed to four mats (46,080 square inches). Through the use of the timber mat travel lane, the ground pressure of the stringing trucks is reduced from 110 PSI (ten times the ground pressures known to compact susceptible soils) to 2.17 PSI, which is a ground pressure well under the level known to cause agriculturally significant compaction. Reductions of ground pressures of other construction equipment (e.g. tracked dozers and trackhoes that can weight up to 60,000 pounds) would be reduced to well under 5 PSI.

The use of the travel lane, as described above, will minimize agricultural compaction to the extent that deep ripping of the area covered by the travel lane would not be necessary subsequent to its use. Furthermore, the use of deep ripping could adversely impact archeological deposits. Should some compaction occur as a result of the use of the travel lane, this could be mitigated through the use of a chisel plow. Chisel plowing would extend to a maximum depth of 10 inches. This would be consistent with current agricultural practices in the area of the archaeological sites and only would affect previously disturbed plow zone deposits.

Rockies Express will ensure that the travel lane will either be placed in non-contributing portions of the eligible sites in Indiana or the area where the travel lane will be located will be mitigated prior to its use (e.g., data recovery will be completed prior to the establishment of the travel lane). Agricultural inspectors will examine the soils beneath

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the travel lane after the mats have been removed. In the event that soils have been compacted, a chisel plow will be used to decompact. In the unlikely event that deep compaction has occurred and ripping of the soils is necessary within an eligible archaeological site, a mitigation plan will be developed in consultation with FERC and the SHPO so that additional data recovery will be conducted at the sites prior to ripping.

Pursuant to Commission regulations, the materials attached hereto are privileged and confidential and are filed accordingly.

Please let me know if you should require additional information.

Respectfully submitted,

/s/ Shippen Howe

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Attorney for
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cc: Laura Turner
Cathy Draeger, Indiana State Historic Preservation Office
Ryan Childs

Attachments: Figures 1 – 2 Archaeological Site Maps
Appendix A: Soils Data

Document Content(s)

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