

December 16, 2016

Chairman Norman C. Bay
Commissioner Cheryl A. LaFleur
Commissioner Collette D. Honorable
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

RE: Rover Pipeline LLC
Docket No. CP15-93-000
Request for Immediate Commission Action

Dear Chairman Bay and Commissioners,

Rover Pipeline LLC (“Rover”) hereby respectfully requests that the Federal Energy Regulatory Commission (“Commission” or “FERC”) grant Rover’s Natural Gas Act (“NGA”) Section 7(c) pending certificate application for the Rover Pipeline Project (“Project”) as soon as possible, but no later than December 2016, so that Rover may prepare to commence construction activities by mid-January 2017.

Achieving this commencement of construction date is vital to allow Rover to comply on a timely basis with certain environmental conditions contained in the Final Environmental Impact Statement (“FEIS”) and associated clearances for the Project. However, Rover will be unable to meet these requirements without Commission action before the end of the year. For instance, Rover must conduct tree felling during certain limited windows. If Rover is unable to commence tree felling by mid-January 2017, the Project very likely will be delayed for up to a full year and it will be not be able to meet the contractual in-service date that its producer-shippers are counting on. This will result in significant economic harm, not only to Rover and its shippers, but also to the natural gas consumers and the national and local economies that stand to benefit from construction of the Project.

This is a matter of significant concern to Rover’s producer-shippers that have made major capital investments and have committed to production and delivery schedules on the basis of Rover’s projected in-service dates. Continued delays in Project execution will have devastating implications for these producer-shippers who have over 1.55 billion cubic feet (“bcf”) per day (“bcf/d”) of natural gas scheduled to begin flowing in July 2017 and up to 3.15 bcf/d starting in November 2017. It will also have a negative economic impact in the market regions that have already made commitments and plans to receive natural gas for a multitude of uses, including domestic consumption for heating and cooling, as well as manufacturing, chemical production, and fuel for power generation.

The negative financial consequences resulting from a failure to start Project construction by mid-January 2017 will also be felt directly by approximately 15,000 construction workers and nearly 2,000 non-construction workers, including surveyors, engineers, environmental specialists, pipeline inspectors, outreach and right-of-way professionals, among others, who are all waiting to begin work on the Project. The ongoing delay in the start of construction is creating a void in employment opportunities in the Project region. In this regard, trade groups and unions that have invested millions of dollars and thousands of hours training their workers to build the Rover Pipeline are on hold awaiting approval of the Project. Communities along the pipeline route that have been planning for and relying upon the income that will result from pipeline construction are already suffering due to the delay in income and revenue associated with sales of services and products such as food, lodging, fuel and other supplies, as well as associated tax revenues, including property and ad valorem taxes. These losses are real and are having a negative impact on communities, including school budgets and community improvement projects, that otherwise would benefit from the added tax basis that will result from the Project.

As you are aware, construction of the Project, which is over 95 percent subscribed (at present 3.1 bcf/d out of 3.25 bcf/d is committed under long-term firm contracts), will enable the transportation of up to 3.25 bcf/d of natural gas from points in Pennsylvania, West Virginia, and Ohio to markets in the Gulf Coast, Midwest, and Canada, providing producer-shippers with markets for bottle-necked production, and gas consumers with access to readily-available, stable, and competitively-priced gas supplies.

Rover commenced the Commission's pre-filing process in June 2014, and subsequently submitted an application under NGA Section 7(c) in the above-captioned docket on February 20, 2015 ("Application"). In the Application, Rover requested that the Commission issue an order approving the Project by November 2015. On July 29, 2016, the Commission issued the FEIS for the Rover Pipeline Project, and Rover currently is awaiting Commission approval of its Application. Construction of the Rover Pipeline Project must commence by no later than mid-January 2017 to avoid or mitigate the significant environmental concerns raised by construction activities in West Virginia, Pennsylvania, Ohio and Michigan.

As a conservation measure to reduce impacts on the federally listed Indiana and northern long-eared bat, Rover committed to clearing trees within the U.S. Fish & Wildlife Service's ("USFWS") approved seasonal windows between October 1 and March 31 in Michigan, Ohio, and Pennsylvania, and between November 15 and March 31 in West Virginia. FERC staff concurred with this conservation measure and included a specific condition in its FEIS that Rover adhere to the USFWS clearing windows. In addition, this conservation measure provides protection for migratory birds in that the trees would be felled outside of the migratory nesting season between April 15 and August 1. Implementation of this conservation measure will require felling of trees from approximately 2,918 acres of land along 511.4 miles of the Project and from 112 acres within the aboveground facilities. All trees will be dropped within the authorized construction right-of-way within the specified windows for later disposal during

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clearing and grading. To accomplish this, multiple crews and equipment must be mobilized along the entire Project construction right-of-way during the USFWS-window.

As detailed above, any further delay in issuance of the Certificate and/or approval to begin the initial phase of construction will severely delay the Project and have a detrimental and cascading impact on Rover's producer-shippers, U.S. natural gas consumers, construction and other workers as well as communities along the Project route.

As we understand it, Rover's Application is complete and there are no legal, procedural or other impediments to the Commission granting the Application and issuing the Certificate. We therefore respectfully request that the Commission issue the Certificate no later than the end of this year.

Respectfully submitted,

/s/ Joey Mahmoud
Joey Mahmoud
Executive Vice President, Engineering & Construction
Energy Transfer Partners, L.P.

cc:

Ann Miles
Terry Turpin
Kimberly Bose

CERTIFICATE OF SERVICE

In accordance with the requirements of Section 385.2010 of the Commission's Rules of Practice and Procedures, I hereby certify that I have this day caused a copy of the foregoing document to be served upon each person designated on the official service list compiled by the Commission's Secretary in this proceeding.

/s/ Dionne McCallum-George
Dionne McCallum-George
Legal Secretary on behalf of
Rover Pipeline LLC