



August 11, 2017

Joel R. Tuttle  
County Commission President  
Morgan County Commission  
77 Fairfax Street, Room 101  
Berkeley Springs, WV 25411

Dear Mr. Tuttle:

Please see below the responses to your questions in letter dated August 8, 2017.

1. MGC has stated they will build the pipeline even if there is no connection line coming from MD. They say they have a Plan B if the TransCanada line is stopped by MD. Residents who have the easements on their property want to know what the pipeline would be used for in that event? Would it just be used to store gas for Martinsburg or is there somewhere else that they would be able to get gas from? Are there future plans for a compressor station or gas storage facility in Morgan County?

Response: Mountaineer is a natural gas distribution utility in West Virginia. The only use for this pipeline is the distribution of natural gas to customers in Morgan, Berkeley, and Jefferson Counties in West Virginia. Mountaineer intends to build the pipeline, but if the TransCanada project providing the source of gas into the Mountaineer distribution system was stopped we would consider other options such as:

- i. Moving forward with the trunk line as is but consider other source options;
- ii. Moving forward with the trunk line and temporarily back-feeding from the Martinsburg system to feed Morgan and western Berkeley counties; or
- iii. Delaying construction and modifying the design of the project.

Significant modification of the design of the project would require WV Public Service Commission approval as well as other regulatory approvals. This could delay the process but is not expected to completely stop the project.

Mountaineer does not have any current plans to install gas storage facilities nor compressor stations.

2. Why does MGC call this line a "low pressure" line, when low pressure lines typically max out at 200 psi - anything above 200 psi, up to 1,500 psi is considered high pressure and is transported in transmission lines, NOT distribution lines?

Response: Mountaineer calls this line a distribution pipeline. There is no particular pressure that indicates or dictates the DOT designation of transmission or distribution. This is based on the Specified Minimum Yield Strength (SMYS) and the functional definition in CFR 192. There are transmission pipelines that operate at pressures below 50 psig as well as over 1,500. Mountaineer operates distribution pipelines in pressure ranges from less than 1 psig to over 400 psig. This pipeline will be operated with a maximum allowable operating pressure (MAOP) of 475 psi. Nomenclature such as low pressure can mean different things to different companies and people. Any references such as "low pressure" that have been made about this pipeline were most likely in comparison to the typical higher pressure transmission pipelines that have been prevalent in the news media.

3. How will our Emergency Response Personnel know how to respond to a natural gas leak or explosion? Who will train them and who will pay for that training?

Response: Mountaineer has a Public Awareness Plan as required by the Pipeline and Hazardous Material Safety Administration. A part of this type of plan includes communications with fire departments and first responders that include training, regular coordination of contact information, etc. Mountaineer pays for the training and regular meetings. Mountaineer is very involved and supportive of regional damage prevention programs and WV 811. Mountaineer currently operates distribution pipelines in 49 of the 55 counties in West Virginia and works with multiple emergency response groups.

4. Who will maintain and be responsible for inspecting the pipeline for safety?

Response: Mountaineer is responsible for all operation and inspection of the pipeline. Mountaineer currently operates and maintains over 6,000 miles of pipeline in the State of WV including a very similar pipeline system in Berkeley County.

5. In WV, the Gas Pipeline Safety Division (GPS) is responsible for the application, oversight and enforcement of pipeline safety regulations under W. Va. Code §24B and is certified annually under 49 USC §60105 by the U.S. Department of Transportation, Pipeline and Hazardous Material Safety Administration (PHMSA), Office of Pipeline Safety (OPS). The GPS Division oversees safety compliance with 49 CFR 191, 192, 195 and 199 for over 14,200 miles of intrastate natural gas and hazardous liquids transmission and regulated gathering pipelines and natural gas distribution pipelines. On an as needed basis, the GPS may inspect interstate transmission pipelines as an agent for PHMSA. With only 6 inspectors for the whole state of WV (over 14,000 miles of pipeline), all based out of Charleston, how is that efficient or effective in maintaining safety records and inspections?

Response: Mountaineer cannot speak for the WV Gas Pipeline Safety Division (GPS). Mountaineer can say that it has frequent audits performed by GPS at all of its service centers as well as individual job sites. Mountaineer and the natural gas industry in general have a very good safety record and do not depend upon regulatory inspections or audits to maintain safe and reliable operation of natural gas pipelines.

6. How will the underground pipeline be marked above ground? Can you expect every single person to "call before they dig" on their property?

Response: The pipeline will be marked above ground with visible pipeline markers in accordance with regulation. "Call before you dig" is state law and should be followed before any excavation regardless of the known presence of a pipeline. Many facilities such as power, telecommunications, sewer, water, etc. are buried and should be located before digging. In addition, we install marking tape above the pipeline in the trench as a warning. Mountaineer actively participates in WV 811.

7. It is my understanding that the Mountaineer Gas Co will lay the pipeline through a large portion of US Silica Property. The safety of a natural gas pipeline near a site that uses explosives as part of a regular operation is of great concern. Someone from US Silica was quoted as saying, "There is no way we are allowed to operate near a gas pipeline!" So the question is how far away will the NG pipeline be from their blast zones? Will all the workers be trained on the safety of operating near a NG pipeline?

Response: There are regulations restricting distance between gas pipelines and blasting. Mountaineer has worked diligently with US Silica to locate the pipeline at a safe distance from any blasting performed by US Silica. The training of workers at US Silica will be a decision made by US Silica, but Mountaineer will participate with US Silica on anything that they need to ensure safety of their employees. Mountaineer and other gas pipelines have and do work with blasting operations associated with mining, road construction, and other construction operations regularly.

8. What will the pipelines be made out of? How often will they be replaced?

Response: The pipeline will be constructed with high yield ductile steel 10" coated pipe. All joints will be welded and X-rayed. The pipe will be fully coated and cathodically protected to prevent corrosion. Any future replacement will be based on conditions identified through continuous monitoring. However, with today's materials and construction practices, we do not expect to have to replace the pipeline for decades.

9. MGC is excluded from the FERC process because they pick up the pipeline just in WV state lines. This pipeline is ONE pipeline and the entire length of this pipeline should be made to go through FERC process and receive an Environmental Impact Statement. Will you get an Environmental Impact Statement for the WV portion of the pipeline, especially since this pipeline has a proposed 100 creek crossings?

Response: Mountaineer is not regulated by FERC, but Mountaineer has submitted permit applications to various state and federal agencies. This permitting process

provides a comprehensive federal and state environmental a regulatory review including identification of and mitigation measures for streams, wetlands, endangered species, and cultural resources.

Please let me know if you have any additional questions. Thank you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Westfall', with a long horizontal flourish extending to the right.

Thomas D. Westfall  
Director of Gas Supply and  
Technical Services