

ATTACHMENT A

*Joint Verified Reply of U. S. Steel Corporation
And the Industrial Associations in Support of U.S. Steel's
Second Motion for Reconsideration and Dismissal of Proceeding
ICC 10-0635*

The information regarding the 6 pipelines identified by Staff is provided below.

1. Compressed Energy Systems, LLC (“CES”)

Per the 2015 Inspection documents this line transmits gas from a well gathering system to Texas Eastern Pipeline:

The Compressed Energy Transmission system has approximately 1160 feet of 2 inch coated and wrapped steel transmission piping that transports gas after being collected from multiple wells. The gas is then transported through a gathering system, is processed, compressed and is then injected into Texas Eastern Pipeline.

CES, Inspection #: 2015-P-00068, Gas_IM_ProtocolForm_11_5_13.pdf at 4.¹ The Web page for CES indicates it gathers and processes gas for sale into the Texas Eastern Pipeline:

Located in the rural Shawnee National Forest region of Southern Illinois, CES takes pride in seeing the results of a decade of hard work and perseverance, working with Abandoned Mine Methane.

* * *

Realizing the Texas Eastern 24" dia. gas pipeline ran virtually underneath the property, he installed a tap and set about constructing both a methane gathering system (now in excess of 50 miles HDPE pipe) and a processing unit to remove the inert gases and moisture from the methane and bring it to pipeline spec. Sales into the pipeline began and this changed the direction the business was heading.

(<http://www.compressedenergysystems.net/index.html>).

¹ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=100>.

2. Crawford County Gas Gathering, LLC. (“CCGG”)

Per the 2015 and 2013 Inspection documents this line transmits gas to a transmission line. Transmission that is 1475.43 feet.

CCGG, Inspection #: 2015-P-00229, Gas_IM_ProtocolForm_11_5_13 at 4.²

The operator supplies gas to a transmission line. Inspection #: 2013-P-00350, ILPS #6 - Record Audit – Transmission at 1.³

Carbon Natural Gas Company appears to own CCGG. Carbon’s 10-K for the Year Ending December 31, 2015 further confirms CCGG operates pipelines and related gathering and treating facilities:

The Company has a 50% interest in Crawford County Gas Gathering Company, LLC (“CCGGC”) which owns and operates pipelines and related gathering and treating facilities. The Company’s gas production located in Illinois is gathered and transported on CCGGC’s gathering facilities.

Carbon Natural Gas Company 10-K for the Year Ending December 31, 2015 (Viewed at <http://carbonnaturalgas.com/sec-filings/>)

3. Gallagher Drilling, Inc. (“GD”)

While the available inspection documents omit the narrative description of the transmission line, statements in the Inspection documents indicate GD is involved in well drilling and transmission with no distribution connections on its transmission line (suggesting it must connect to a transmission pipeline or storage):

There are no identified sites along the transmission line or well sites.

Inspection #: 2015-P-00176, Gas_IM_ProtocolForm_11_5_13.pdf at 4, 12.⁴

On March 19, 2014, Staff conducted a review of the 2013 Annual DOT Transmission and Distribution Reports submitted to the ICC by Gallagher Drilling Inc. The review is required to determine compliance with applicable IL Adm. Codes and the Code of Federal Regulations adopted via IL Adm. Part 590. Staff observed no issues with the data reported in the 2013 annual reports submitted for review. Staff contacted Mike Gallagher on March 17, 2014, and was informed the three distribution services reported on the 2013 distribution report were removed by August of 2013 and are no longer connected or supplied by the transmission piping system.

² Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=148>.

³ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=148>.

⁴ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=101>.

Inspection #: 2014-P-00139, ILPS #1 - Field Trip Report.pdf at 1.⁵

On May 5, 2015, Staff conducted a review of the 2014 Annual DOT Transmission Report submitted to the ICC by Gallagher Drilling Inc. ... A review of their initial annual transmission report conducted on 3/17/2015 determined they had the distribution box marked in Section C of the 2014 annual report submitted for review. This has been corrected and a supplemental report was submitted to PHMSA on 4/20/2015. Gallagher sold off the distribution facilities to Liberty Utilities in late 2013. There was also a reduction in total pipe mileage between 2013 and 2014. Gallagher Drilling abandoned piping associated with a storage field they shut down and abandoned in late 2013.

Inspection #: 2015-P-00106, ILPS #1 - Pipeline Safety Report.pdf at 1.⁶

4. Keyrock Energy, LLC (“Keyrock”)

Per PHMSA, Keyrock operates 10 miles of gas gathering lines in Illinois and less than 1 mile of transmission line. ([http://primis.phmsa.dot.gov/comm/reports/operator/OperatorIM_opid_32674.html?nocache=7571# OuterPanel tab 4](http://primis.phmsa.dot.gov/comm/reports/operator/OperatorIM_opid_32674.html?nocache=7571#OuterPanel_tab_4)). Per the 2015 Inspection documents this line transmits gas to Trunkline:

There are two line markers on the transmission line one at the beginning and on at the Trunkline take station.

Keyrock, Inspection #: 2015-P-00088, ILPS #4 - Field Audit.pdf at 3.⁷

⁵ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=101>.

⁶ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=101>.

⁷ Viewable at <http://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=152>.

5. **LSP University Park, LLC**

Per the 2015 Inspection documents this line is a lateral transmission line from ANR Transmission to LSP University Park LLC where gas supplies LSP University Park's generation facility:

The natural gas fired turbine generation facility owned and operated by LSP University Park LLC is supplied natural gas via a .6 mile segment of 12 inch .250 wall coated steel and cathodically protected pipeline that has an MAOP of 1000 psig with a normal operating pressure of 500 to 650 psig. ANR Transmission is the supplier for University Park.

LSP University Park, LLC, Inspection #: 2015-P-00069, Gas_IM_ProtocolForm_11_5_13.pdf at 4.⁸

On April 9, 2015, Staff, conducted a review of the Transmission Integrity Management Plan for the LSP University Park LLC natural gas fired turbine generation plant located in University Park, Illinois. Currently the pipeline has no HCA's or Identified Sites. Staff reviewed the associated patrolling and continuing surveillance reports and records for 2012-2014. USDI was hired as a consultant and provides operational and maintenance activities for ANR Pipeline who owns the lateral that supplies LSP University Park generation facility.

LSP University Park, LLC, Inspection #: 2015-P-00069, ILPS #1 - Pipeline Safety Report.pdf at

1.⁹

6. **University Park Energy, LLC**

Per the 2015 Inspection documents this line is a lateral transmission line from ANR Transmission to University Park Energy, LLC where gas is utilized for 6 natural gas generators:

The University Park Energy transmission system takes pipeline quality natural gas from ANR Pipeline through the interconnect point and transports gas through approximately 1860 feet / .35 miles of 12 inch .250 wall X52 piping with a Maximum Allowable Operating Pressure of 850 psig. The gas is then utilized by 6 turbine generation units.

University Park Energy, LLC, Inspection #: 2015-P-00319, Gas_IM_ProtocolForm_11_5_13.pdf at 4.¹⁰

⁸ Viewable at <https://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=120>.

⁹ Viewable at <https://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=120>.

¹⁰ Viewable at <https://www.icc.illinois.gov/pipelinesafety/operator.aspx?oid=118>.