



EXCO Resources (PA), LLC

260 Executive Drive • Suite 100 • Cranberry Township, PA 16066
Phone (724) 720-2500 • Fax: (724) 720-2505

May 14, 2014

RECEIVED

**VIA ELECTRONIC MAIL (sjakab@pa.gov) and
UPS**

MAY 14 2014

PA PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
400 North Street
Harrisburg, PA 17120

**Re: Act 127 Pennsylvania Pipeline Operator Annual Registration Form
Response to Comments
EXCO Resources (PA), LLC
Docket No. A-2012-2294010
Utility Code: 1714419**

Dear Ms. Chiavetta:

This letter is in response to Darren D. Gill's April 30, 2014 letter addressed to myself with regard to the incomplete Act 127 Pennsylvania Pipeline Operator Annual Registration Form. Our responses to your comments are provided below.

- Reference application, Section 6, PA L&I Registration Number – Applicant has not entered a propane registration number on their registration form. If applicant does not have a number, please enter "N/A" in the space provided. Please provide an updated registration page with the appropriate corrections. Please provide an original document by using the submission method listed above.*

RESPONSE: EXCO Resources (PA), LLC does NOT have a propane registration number and "N/A" has been entered in the Section 6 space. A REVISED and original Act 127 Pennsylvania Pipeline Operator Annual Registration Form has been enclosed with this response to comment letter.

- Reference application, Section 12, Operational Information, Comments – Applicant has not provided an explanation to why the pipeline mileage in Attachment B of this year's registration differs from the previous year's mileage registration. For example, reported miles for the Class 1 Gathering in Indiana last year was 5.94 and this year's report shows zero. Please explain any additions, deletions or variations since your previous year's registration. Please provide an updated registration page with the appropriate corrections. Please provide an original document by using the submission method listed above.*

RESPONSE: In 2013, EXCO Resources (PA), LLC (EXCO) performed an updated "Regulated Pipeline Determination" evaluation of EXCO's conventional pipeline system in accordance with 49 CFR 192.8 (a) which states "an operator must use API RP 80 to determine if an onshore pipeline is an onshore gathering line". The purpose of this evaluation was to determine the furthestmost downstream point of our production operations as defined in section 2.3 of API RP 80, and to then ensure that any gathering sections were properly classified.

The EXCO production and pipeline system consists of single well and multiple well/operator production operations that include separators, production compressors, drips, dryers, meters, customer taps, and interconnecting flow lines. It was concluded that all of EXCO's conventional operations previously reported as gathering are actually "Typical Appalachian Production Operations" as defined and illustrated in RP 80 3.2.5 and Figure B-11 (Appendix B).

As a result, EXCO has reduced the mileage in the 2013 report, which is less than what was previously reported as gathering in the 2012 Attachment B.

A REVISED and original Act 127 Pennsylvania Pipeline Operator Annual Registration Form has been enclosed with this response to comment letter.

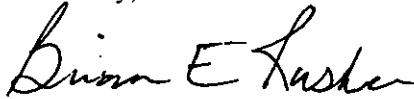
3. *Reference application, Attachment A, Hazardous Liquids Lines – The applicant checked the box for not owning any reportable Hazardous Liquid Lines, but reported Hazardous Liquid Lines in the Attachment A table. If applicant has reportable Hazardous Liquid Lines, please do not check the box in Attachment A and list the reportable lines. Please provide an updated registration page with the appropriate corrections. Please provide an original document by using the submission method listed above.*

RESPONSE: EXCO Resources (PA), LLC does not own any reportable Hazardous Liquid Lines. The box for NOT owning hazardous liquids lines has been checked. We have revised the Attachment A Table to show zero miles. A REVISED and original Act 127 Pennsylvania Pipeline Operator Annual Registration Form has been enclosed with this response to comment letter.

I, Brian E. Rushe, P.E., hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

If you should have any questions or require additional information, then please contact me at (724) 720-2590 or at brushe@excoresources.com.

Sincerely,



Brian E. Rushe, P.E.
Construction & Regulatory Manager

Enclosure

Cc: Stephen Jakab

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SECRETARY'S BUREAU



**Act 127
Pennsylvania Pipeline Operator Annual Registration Form**

Please submit completed form by March 31

Registration for Previous Calendar Year Ending: 2013
Docket Number: A-2012-2294010

- If you need help getting your docket number,
- Go to our website, <http://www.puc.pa.gov> and go to the bottom section of the home page under Natural Gas.
 - Click on the link for Act 127.
 - On the Act 127 page you will see a link on the lower section of the page under Pipeline Operators Registry.
 - Click on the link to "View Current List of Registered Pipeline Operators."
 - Click on the utility code next to your name; find the Docket Number (A-2012-xxxxxx) under the Docketed Cases.

1. **Registrant (Full name of pipeline operator):** EXCO Resources (PA), LLC

Comments: If applicable, explain any changes to your company name or legal status (acquisition, merger, etc.) in the past calendar year.

2. **Types of Pipelines and/or Facilities.**
Please note that natural gas public utilities are not required to file this form.
Pipelines and/or facilities covered by this form are associated with the following types of facilities and transport the following types of commodities: (select all that apply)

Gas Distribution

Natural Gas Propane Gas

Gas Transmission

Natural Gas
 Propane Gas
 Other Gas Define:

Gas Gathering

Hazardous Liquid
 Other Define:

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 SECRETARY'S BUREAU

3. **Main Mailing Address:**
Provide the address to which the Commission will serve all correspondence relating to this registration.

Street Address/P. O. Box: 260 Executive Drive, Suite 100
 City, State, Zip Code: Cranberry Township, PA 16066

4. **Physical Address:**
Provide the address of your primary Pennsylvania facility. This address is needed by the Commission to perform inspections and onsite visits.
Do not provide a post office box number.

Street Address: 260 Executive Drive, Suite 100
 City, State, Zip Code: Cranberry Township, PA 16066

5. **US DOT Operator ID Number:**
Provide the number assigned to you by the United States Department of Transportation, Pipeline Hazardous and Materials Safety Administration (PHMSA). 7009

6. **PA L&I Propane Registration Number:**
Provide your propane registration number with the Pennsylvania Department of Labor and Industry (if applicable).
If you do not have a number, please enter "N/A". N/A

7.	Regulatory Contact Information: <i>Complete in full with contact information of the person in your company the Commission can contact for questions and other matters pertaining to your registration and operations.</i>
	Name: Brian E. Rushe, P.E.
	Street Address: 260 Executive Drive, Suite 100
	City, State, Zip Code: Cranberry Township, PA 16066
	Email Address: brushe@excoresources.com
	Telephone Number: (724) 720-2590
8.	Assessment Contact Information: <i>Complete in full with contact information of the person in your company who is responsible for receiving the Commission's assessment (billing) invoices and paying the assessment under Act 127.</i>
	Name: Brian E. Rushe, P.E.
	Street Address: 260 Executive Drive, Suite 100
	City, State, Zip Code: Cranberry Township, PA 16066
	Email Address: brushe@excoresources.com
	Telephone Number: (724) 720-2590
9.	Federal EIN Number (if applicable): 90-0774186
10.	Pipeline Emergency (PEMA) Contact Information: <i>Complete in full with contact information of the person in your company who the Commission can call in an emergency situation. This information is critical to the Commission's interactions with the Pennsylvania Emergency Management Authority (PEMA).</i>
	Name: Brian E. Rushe, P.E.
	Street Address: 260 Executive Drive, Suite 100
	City, State, Zip Code: Cranberry Township, PA 16066
	Email Address: brushe@excoresources.com
	Telephone Number: (724) 720-2590
11.	Attorney (if applicable): <i>Complete this section only if an attorney is filing this registration form on your company's behalf.</i>
	Name:
	Street Address:
	City, State, Zip Code:
	Email Address:
	Telephone Number:
12.	Operational Information:
Comments: Report any newly installed pipeline, and explain any additions, deletions or variations since your previous year's registration.	
See attached explanation.	

Act 127

Pennsylvania Pipeline Operator Annual Registration Form

12. Operational Information:

Comments: Report any newly installed pipeline, and explain any additions, deletions, or variations since your previous year's registration.

RESPONSE: In 2013, EXCO Resources (PA), LLC (EXCO) performed an updated "Regulated Pipeline Determination" evaluation of EXCO's conventional pipeline system in accordance with 49 CFR 192.8 (a) which states "an operator must use API RP 80 to determine if an onshore pipeline is an onshore gathering line". The purpose of this evaluation was to determine the furthestmost downstream point of our production operations as defined in section 2.3 of API RP 80, and to then ensure that any gathering sections were properly classified.

The EXCO production and pipeline system consists of single well and multiple well/operator production operations that include separators, production compressors, drips, dryers, meters, customer taps, and interconnecting flow lines. It was concluded that all of EXCO's conventional operations previously reported as gathering are actually "Typical Appalachian Production Operations" as defined and illustrated in RP 80 3.2.5 and Figure B-11 (Appendix B).

As a result, EXCO has reduced the mileage in the 2013 report, which is less than what was previously reported as gathering in the 2012 Attachment B.

- Complete Attachments "A" and "B". For each Pennsylvania gas or hazardous liquids pipeline, provide the in-state mileage in operation as of December 31 of the prior year, by class and by county. Mileage should be reported for each individual pipe. Multiple pipelines in one trench are considered individual pipes for reporting purposes. If you have no miles to report on these attachments, check the appropriate block at the top of the form(s).
- Complete Attachment "C" by providing the country of manufacture and mileage data for all tubular steel products installed in the prior calendar year in Pennsylvania for the exploration, gathering or transmission of natural gas or hazardous liquids. If you have no data to report on this attachment, check the appropriate block at the top of the form.

13. Filing Fee:

The filing fee for this Annual Registration Form is \$250, payable to the "Commonwealth of Pennsylvania."
The filing fee can either be mailed or electronically paid when eFiling your form with the Commission's eFiling system.
NOTE: If you are a Propane Distributor registered with the PA L&I or a Borough, you are exempt from paying this filing fee.

Fee Exemptions (please indicate if either exemption applies):

Propane Distributor registered with PA L&I

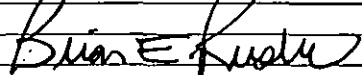
Borough

14. Verification:

The person responsible (corporate officer or attorney) for filing your Annual Registration Form must affix his or her signature and verify that all information provided on the form is true to the best of his or her knowledge, information and belief. NOTE: Registration Forms that are not verified will not be accepted for filing.

I hereby state that the information in this application is true and correct to the best of my knowledge, information and belief. I understand that the statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

Name:
 Brian E. Rushe, P.E.

Signature: 

Title:
 Construction & Regulatory Manager

Date:
 5/13/2014

15. Registration:

eFiling:

Registration Forms may be eFiled with the PUC. If eFiling your renewal form, go to <http://www.puc.pa.gov> and click on the eFiling link on the bottom of the page under Issues, News & Reports. Please choose "Existing Case" as the type of filing and enter your docket number where indicated.

By mail:

Send original, signed copy of registration form along with attachments and filing fee (if applicable) to:

Secretary, PA Public Utility Commission
 Keystone Building, 2nd Floor
 400 North Street
 Harrisburg, PA 17120

Reminders:

- It is the responsibility of registrants to keep the Commission notified of any changes to your contact information by providing notice, in writing, to the Commission's Secretary at the above address.
- Incomplete registration forms or those missing any attachments are unacceptable for filing and will be delayed for processing until the required information is sent to the Commission's Secretary's Bureau. If you require assistance or have questions when completing this form, call 717-772-7777.
- Registrations are public records. Accordingly, DO NOT place social security numbers, credit card numbers, bank account numbers or other confidential information on the registration form.

*****PLEASE KEEP A COPY OF YOUR COMPLETED REGISTRATION FORM FOR YOUR RECORDS*****

Additional Comments: Use this section to add any additional information:

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Attachment A

Hazardous Liquids Lines
 Calendar Year Ending: 2013
 Pipeline Operator: EXCO Resources (PA), LLC

Please check here if you have no reportable Hazardous Liquids Lines

Please report mileage to the nearest 1/10th of a mile.

HCA = High Consequence Area

County	Intrastate		Interstate		Total
	Non-HCA	HCA	Non-HCA	HCA	
Adams					0.0
Allegheny					0.0
Armstrong					0.0
Beaver					0.0
Bedford					0.0
Berks					0.0
Blair					0.0
Bradford					0.0
Bucks					0.0
Butler					0.0
Cambria					0.0
Cameron					0.0
Carbon					0.0
Centre					0.0
Chester					0.0
Clarion					0.0
Clearfield					0.0
Clinton					0.0
Columbia					0.0
Crawford					0.0
Cumberland					0.0
Dauphin					0.0
Delaware					0.0
Elk					0.0
Erie					0.0
Fayette					0.0
Forest					0.0
Franklin					0.0
Fulton					0.0
Greene					0.0
Huntingdon					0.0
Indiana					0.0
Jefferson					0.0
Juniata					0.0
Lackawanna					0.0
Lancaster					0.0
Lawrence					0.0
Lebanon					0.0
Lehigh					0.0
Luzerne					0.0
Lycoming					0.0
McKean					0.0
Mercer					0.0
Mifflin					0.0
Monroe					0.0
Montgomery					0.0

Montour					0.0
Northampton					0.0
Northumberland					0.0
Perry					0.0
Philadelphia					0.0
Pike					0.0
Potter					0.0
Schuylkill					0.0
Snyder					0.0
Somerset					0.0
Sullivan					0.0
Susquehanna					0.0
Tioga					0.0
Union					0.0
Venango					0.0
Warren					0.0
Washington					0.0
Wayne					0.0
Westmoreland					0.0
Wyoming					0.0
York					0.0
Total	0.0	0.0	0.0	0.0	0.0

Attachment B

Mileage
Calendar Year Ending: 2013
Pipeline Operator: EXCO Resources (PA), LLC

Please check here if you have no miles to report

Act 127 mileage reporting for this form should not include any pipelines subject to the exclusive jurisdiction of the Federal Energy Regulatory Commission.

Please report mileage to the nearest 1/10th of a mile.

County	Number of Farm Taps	Class 1 Gathering (Conventional)	Class 1 Gathering (Unconventional)	Gathering, Transmission & Distribution				
				Class 1 Transmission & Distribution	Class 2 Gathering Transmission & Distribution	Class 3 Gathering Transmission & Distribution	Class 4 Gathering Transmission & Distribution	Total Class 1 T&D + Class 2+3+4 G,T&D
Adams								0.0
Allegheny								0.0
Armstrong								0.0
Beaver								0.0
Bedford								0.0
Berks								0.0
Blair								0.0
Bradford								0.0
Bucks								0.0
Butler								0.0
Cambria								0.0
Cameron								0.0
Carbon								0.0
Centre								0.0
Chester								0.0
Clarion	23.0			11.4				11.4
Clearfield								0.0
Clinton								0.0
Columbia								0.0
Crawford								0.0
Cumberland								0.0
Dauphin								0.0
Delaware								0.0
Elk								0.0
Erie								0.0
Fayette								0.0
Forest								0.0
Franklin								0.0
Fulton								0.0
Greene								0.0
Huntingdon								0.0
Indiana								0.0
Jefferson	159.0			18.0				18.0
Juniata								0.0
Lackawanna								0.0
Lancaster								0.0
Lawrence								0.0
Lebanon								0.0
Lehigh								0.0
Luzerne								0.0
Lycoming								0.0

McKean								0.0
Mercer								0.0
Mifflin								0.0
Monroe								0.0
Montgomery								0.0
Montour								0.0
Northampton								0.0
Northumberland								0.0
Perry								0.0
Philadelphia								0.0
Pike								0.0
Potter								0.0
Schuylkill								0.0
Snyder								0.0
Somerset								0.0
Sullivan								0.0
Susquehanna								0.0
Tioga								0.0
Union								0.0
Venango								0.0
Warren								0.0
Washington								0.0
Wayne								0.0
Westmoreland								0.0
Wyoming								0.0
York								0.0
Total	182.0	0.0	0.0	29.4	0.0	0.0	0.0	29.4

Attachment C

Country of Manufacture
 Calendar Year Ending: 2013
 Pipeline Operator: EXCO Resources (PA), LLC

Please check here if you have no lines installed in the previous calendar year

Please report mileage to the nearest 1/10th of a mile

Country of Manufacture	Length of tubular steel products	Material Test Report (yes/no)	
		Yes	No
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
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		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
		<input type="checkbox"/>	<input type="checkbox"/>
Total	0.0		

BECKY SHUM
7247202641
EXCO RESOURCES
260 EXECUTIVE DR.
CRANBERRY TOWNSHIP PA 16066

1 LBS

1 OF 1

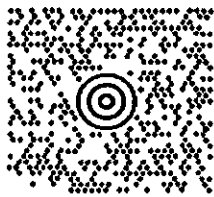
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SHIP TO:

ROSEMARY CHIAVETTA, SECRETARY
PA PUBLIC UTILITY COMMISSION
400 NORTH STREET

MAY 14 2014

HARRISBURG PA 17120-9200
PA 17120-9200 PUBLIC UTILITY COMMISSION
SECRETARY'S BUREAU

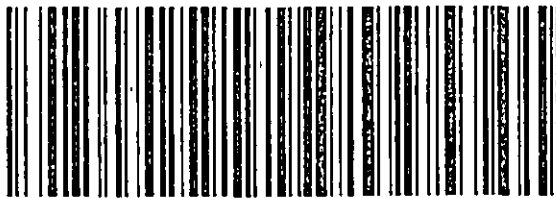


PA 171 9-20



UPS GROUND

TRACKING #: 1Z E14 8Y6 03 9851 8268



BILLING: P/P

Reference # 1: cranberry
Reference # 2: 8042

CS 76.2.03

WNTZ80 53.0A 04/2014



TO: CHIAVETTA, R. PUC (CHIAVETTA)
Agency: PUC
Floor:
External Carrier: UPS

5/15/2014 9:46:17 AM



1ZE148Y60398518268

UPS CampusShip:

PUBLIC UTILITY COMMISSION
400 NORTH ST

HARRISBURG PA 17120-1005

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