

BKV Operating, LLC

October 30, 2019

Secretary's Bureau
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
2nd Floor, Room-N201

RE: BKV Operating LLC, Utility Code 1720790
2018 Calendar Year Act 127 Pipeline Operator Registration

To Whom It May Concern:

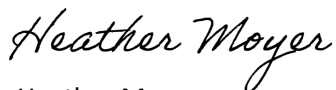
The Gas and Hazardous Liquids Pipeline Act, Act of Dec. 22, 2011, P.L. 586, No. 127 (Act 127), requires operators of certain non-public utility pipelines in Pennsylvania to file an annual operator registration form with the Pennsylvania Public Utility Commission (Commission). The annual Act 127 registration form must be filed with the Commission on or before March 31 and provide information on the pipelines that the company operates at the end of the previous calendar year.

In March 2018, BKV Operating LLC (BKV) filed an Act 127 registration form identifying itself as the operator of approximately 14.4 miles of pipeline in Susquehanna and Wyoming Counties, Pennsylvania, for the 2017 calendar year. BKV also included two attachments with the registration form confirming that Carrizo (Marcellus) LLC (Carrizo) had transferred these pipelines to BKV in November 2017.

BKV recently learned that, as a result of an administrative error, the company did not file an Act 127 registration form the 2018 calendar year. BKV is belatedly submitting the registration form, which was due to be filed on or before March 31, 2019, as an attachment to this letter. The registration form identifies BKV as the operator of 14.4 miles of unconventional Class 1 gas gathering lines in Susquehanna and Wyoming Counties, Pennsylvania.

BKV regrets the oversight that caused the company to miss the original deadline for submitting the Act 127 registration. BKV has taken steps to ensure that subsequent filings with the Commission in a timely manner. Please feel free to contact me at 570-278-7450 if you have any additional questions or concerns about the information provided in this request.

Respectfully,



Heather Moyer
Regulatory Manager

12231 State Route 706, Montrose, PA 18801
Office Phone: 570-278-7450



Act 127
Pennsylvania Pipeline Operator Annual Registration Form

Please submit completed form by March 31

Registration for Previous Calendar Year Ending:

Docket Number:

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 Pipeline Safety, then click on the link for Act 127 (Pipeline Act).
- 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):

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:

3. Main Mailing Address:

Provide the address to which the Commission will serve all correspondence relating to this registration.

Street Address/P. O. Box:

City, State, Zip Code:

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:

City, State, Zip Code:

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).

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".

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:
	Street Address:
	City, State, Zip Code:
	Email Address:
	Telephone Number:
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:
	Street Address:
	City, State, Zip Code:
	Email Address:
	Telephone Number:
9.	Federal EIN Number (if applicable):
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:
	Street Address:
	City, State, Zip Code:
	Email Address:
	Telephone Number:
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.	

	- 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: <i>The filing fee for this Annual Registration Form is \$250, payable to the "Commonwealth of Pennsylvania."</i> The filing fee can either be mailed or electronically paid when eFiling your form with the Commission's eFiling system. <u>NOTE: If you are a Propane Distributor registered with the PA L&I or a Borough, you are exempt from paying this filing fee.</u>								
Fee Exemptions (please indicate if either exemption applies):									
Propane Distributor registered with PA L&I ☐									
Borough ☐									
14.	Verification: <i>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. <u>NOTE: Registration Forms that are not verified will not be accepted for filing.</u></i>								
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).									
<table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;">Name:</td> <td style="width: 50%; border: none;">Signature: <i>Heather Moyer</i></td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"></td> </tr> <tr> <td style="border: none;">Title:</td> <td style="border: none;">Date:</td> </tr> <tr> <td style="border: none;"></td> <td style="border: none;"></td> </tr> </table>		Name:	Signature: <i>Heather Moyer</i>			Title:	Date:		
Name:	Signature: <i>Heather Moyer</i>								
Title:	Date:								
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, 2 nd 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:									

Attachment A

**Hazardous Liquids Lines
Calendar Year Ending:
Pipeline Operator:**

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

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

Attachment B

Mileage
Calendar Year Ending:
Pipeline Operator:

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)	Class 1 Transmission & Distribution	Gathering, 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								
Allegheny								
Armstrong								
Beaver								
Bedford								
Berks								
Blair								
Bradford								
Bucks								
Butler								
Cambria								
Cameron								
Carbon								
Centre								
Chester								
Clarion								
Clearfield								
Clinton								
Columbia								
Crawford								
Cumberland								
Dauphin								
Delaware								
Elk								
Erie								
Fayette								
Forest								
Franklin								
Fulton								
Greene								
Huntingdon								
Indiana								
Jefferson								
Juniata								
Lackawanna								
Lancaster								
Lawrence								
Lebanon								
Lehigh								
Luzerne								
Lycoming								

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

Attachment C

Country of Manufacture
Calendar Year Ending:
Pipeline Operator:

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

[illegible]