



Park Place Corporate Center 2
2000 Commerce Drive
Pittsburgh, PA, PA 15275

5/5/2020

Pennsylvania Public Utility Commission
Gas Pipeline Safety Division
PO Box 3265
Harrisburg, PA 17105-3265


**Re: Act 127 Pennsylvania Pipeline Operator Annual Registration Form
Docket A-2012-2293101**

Pennsylvania Public Utility Commission,

On April 30, 2020 we received a data request (The Notice) regarding our Act 127 Report Operator Annual Report Form. The Notice requested explanations of differences of class 1 and 2 mileages between 2018 and 2019 calendar years reports.

Williams regularly looks to verify structures on our class location maps to match what is contained in our databases. These changes can be new structures being built or perhaps structures that were thought to be intended for human occupancy in fact being barns, sheds, etc. Class location changes as a result of structure verification are the major reason for the difference in mileages reported. Additionally, minor mapping changes such as updating centerlines can account for hundreds of very small changes per year. In Attachment A major changes for mileages are explained.

Additional major changes can be due to gathering lines being reclassified as production or flow lines, although these do not appear to be a major factor in the counties selected in The Notice. Williams did not divest or decommission (abandon) pipelines in the prior year.

I, , 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 have any additional requests regarding this notice, please do not hesitate to contact me by phone, mail, or email.

Troy Stahle
Pipeline Safety Engineer
2000 Commerce Drive
Pittsburgh, PA 15275
(412) 787-5290

Attachment A

	2018	2019	Explanation
Fayette	26.2 miles Class 2 Trans. & Dist.	23.9 miles Class 2 Trans. & Dist.	There are 12 lines that are class 2. 5 of the lines experienced more than .2 mile class location decreases. The other lines had smaller decreases or even small increases. Decreases are the result of a combination of class location analysis, clustering, and structures being removed as a result of structure verification.
Lawrence	.4 miles Class 2 Trans. & Dist.	.2 Class 2 Trans. & Dist.	Williams did not report any class 2 mileages in Lawrence County. It did however report Class 3 mileages for both years, which did decrease from .4 miles to .2 due to a High Occupancy site being reclassified as a building intended for human occupancy and therefore Class 3 mileage being reduced.
Washington	5.4 miles Class 2 Trans. & Dist.	4.8 miles Class 2 Trans. & Dist.	Class 2 mileage in Washington county decreased by approximately .6 miles due to class decrease on the Vesta Pipeline. Clustering was a major factor in this reduction.
Westmoreland	27.1 miles Class 1 Gathering Unconv.	24.1 miles Class 1 Gathering Unconv.	While many of the lines experienced minor changes, Line ID 69127 experienced a class location increase resulting it being moved from class 1 to class 2.
Westmoreland	13 miles Class 2 Trans. & Dist.	10 miles Class 2 Trans. & Dist.	The most major changes were Shuglie to Hufford and Guardasoni pipelines increased from class 2 to class 3 resulting in less class 2 mileage. Several of the Class 2 sections were reduced to class 1 as well.



COMMONWEALTH OF PENNSYLVANIA
PENNSYLVANIA PUBLIC UTILITY COMMISSION
400 NORTH STREET, HARRISBURG, PA 17120

IN REPLY PLEASE
REFER TO OUR FILE

April 30, 2020

Docket No. A-2012-2293101
Utility Code: 1714368

TROY STAHL
LAUREL MOUNTAIN
MIDSTREAM OPERATING, LLC
2000 COMMERCE DR PARK PL #2
PITTSBURGH PA 15275

RE: Act 127 Pennsylvania Pipeline Operator Annual Registration Form

Dear Mr. Stahl:

On March 31, 2020, Laurel Mountain Midstream Operating, LLC's registration for renewal of the Act 127 Pennsylvania Pipeline Operator Annual Registration in the Commonwealth of Pennsylvania was accepted for filing with the Public Utility Commission. The registration form was incomplete. In order for us to complete our analysis of your registration renewal, the Energy Industry Group requires answers to the attached question(s).

Please be advised that you are directed to forward the requested information to the Commission within **10** days of receipt of this letter. Failure to respond may result in the registration renewal being denied. As well, if Laurel Mountain Midstream Operating, LLC has decided to withdraw its registration renewal, please reply notifying the Commission of such a decision.

Please forward the information to the Secretary of the Commission at the address listed below. When submitting documents, all documents requiring notary stamps must have original signatures. Please note that some responses may be e-filed to your case, <http://www.puc.pa.gov/efiling/default.aspx>. A list of document types allowed to be e-filed can be found at <http://www.puc.pa.gov/efiling/DocTypes.aspx>.

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

Your answers should be verified per 52 Pa Code § 1.36. Accordingly, you must provide the following statement with your responses:

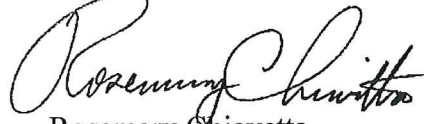
I, _____, hereby state that the facts above set forth are true and correct to the best of my knowledge, information and belief, and that I expect to be able to prove the same at a hearing held in this matter. I understand that the

statements herein are made subject to the penalties of 18 Pa. C.S. § 4904 (relating to unsworn falsification to authorities).

The blank should be filled in with the name of the appropriate company representative, and the signature of that representative should follow the statement.

In addition, to expedite completion of the registration renewal, please also e-mail the information to Lee Yalcin at lyalcin@pa.gov. Please direct any questions to Lee Yalcin, Bureau of Technical Utility Services, at lyalcin@pa.gov (preferred) or (717) 787-6723.

Sincerely,

A handwritten signature in cursive script, appearing to read "Rosemary Chiavetta".

Rosemary Chiavetta
Secretary

Enclosure

Laurel Mountain Midstream Operating, LLC
Docket No. A-2012-2293101
Data Requests

- Reference attachment B, the reported 2019 mileages indicate changes from the 2018 mileage filing report for the following Counties below, registrants must explain under section 12 (or additional pages) any changes to the previous year's reported mileage if applicable. Please submit (an) explanation(s) for the changes indicated below for each County/pipeline category:

	2018	2019
Fayette	26.2 miles Class 2 Trans. & Dist.	23.9 miles Class 2 Trans. & Dist.
Lawrence	.4 miles Class 2 Trans. & Dist.	.2 Class 2 Trans. & Dist.
Washington	5.4 miles Class 2 Trans. & Dist.	4.8 miles Class 2 Trans. & Dist.
Westmoreland	27.1 miles Class 1 Gathering Unconv.	24.1 miles Class 1 Gathering Unconv.
Westmoreland	13 miles Class 2 Trans. & Dist.	10 miles Class 2 Trans. & Dist.

- Please indicate if Laurel Mountain Midstream Operating, LLC divested or decommissioned any of its pipeline assets from the prior reporting year.