

## **APPENDIX G**

### **Rockies Express Depth of Cover Plan**

**Rockies Express Pipeline LLC  
Rockies Express Pipeline - West Project  
Docket No. CP06-354-000**

**REX-West  
Depth of Cover Plan**

**REX has developed this Depth of Cover Plan for use in actively cultivated areas.**

- I. Monitoring** - REX will implement the following measures to actively monitor depth of cover over the pipeline in agricultural areas:
1. Upon commissioning, Rockies Express will implement a surveillance plan which includes monthly aerial pipeline patrolling to inspect for excavation activities, ground movement, wash-outs, leakage, and/or other activities. Any observance of excavation activities, ground movement, wash-outs and/or other earth moving activities will cause the Rockies Express operating group to initiate a corresponding depth survey in the respective area.
  2. Within one-year of installation of cathodic protection systems, a close interval survey (CIS) will be performed on the REX-West pipeline which will cause Rockies Express operations personnel and contractors to walk this REX-West right-of-way. Any signs of reduction or disturbance of ROW, aside from typical farming practices (e.g. planting, discing, harvesting, etc.), during this CIS will be followed up with a corresponding depth survey in the respective area.
  3. Rockies Express will utilize an outreach program that includes landowner and tenant communication to address pipeline location, operations, maintenance, and emergency reporting. This outreach program will include an introduction to the local Rockies Express representatives who need to be contacted regarding erosion or other maintenance issues.

The landowner and tenant outreach program conducted by Rockies Express is intended to facilitate ongoing company and landowner communications and education, including appropriate land use practices within the permanent easement during and after right-of-way restoration. While Rockies Express has only limited control of landowner or tenant activities within the permanent easement, Rockies Express will continue to provide communications on subjects including land use, easement monitoring and maintenance, and reporting.

- II. Restoration and Mitigation** - REX will implement specific restoration and mitigation measures in active farming areas, as follows:

**Construction:** As a practical matter, the depth of cover will be established from the working grade (i.e. after topsoil segregation); therefore the depth of cover established during restoration in active agricultural areas will be in excess of 36-inches due to the additional depths realized when restoring previously segregated topsoil. Additional depths of cover may be realized at foreign line crossings such as utilities, drain tile, or existing permanent erosion control structures (i.e. terraces) due to extra line separation requirements between foreign lines.

**Post Construction:** REX will determine appropriate and specific mitigation measures for locations with depth of cover concerns based upon site specific conditions and in

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accordance with applicable OPS/PHMSA regulatory requirements, including but not limited to re-contouring, importing soil and/or line lowering.

- III. Deeper Depth of Cover Evaluation** – REX has identified locations as practicable where environmental conditions and farming practices may warrant deeper depths of cover (e.g. highly erodible soils; deep-tilling farming areas; terraced fields; and other depth of cover concerns) based upon landowner contacts.

Locations where landowners have expressed specific concern with depth of cover are provided in attached Table 1; REX believes these locations include those where deep-tilling farm practices might be utilized. REX rights-of-way agents have offered additional depth of cover (4-ft) on these locations. However, while REX has offered extra depth of cover, landowners with depth of cover concerns on 16 tracts have signed easements that provide for extra depth of cover, 82 tracts remain open even though extra depth of cover has been offered at this time. REX will continue to negotiate in good faith with landowners for easements, including depth of cover provisions.

Locations with highly erodible soils by wind or water are identified in attached Table 2. REX believes that careful adherence to restoration provisions contained in its *Upland Erosion Control, Revegetation, and Maintenance Plan* will adequately prevent significant loss of topsoil in these areas. However, additional emphasis on restoration success will be placed on these areas during post-construction monitoring. Mitigation as described above will be performed as necessary should erosion cause impairment of normal agricultural practices in these areas.

Locations with terraced fields are provided in attached Table 3. Information regarding construction in these areas is provided in the attached diversion terrace construction/restoration typical drawing.

- IV. Justification Where Additional Depth of Cover Requested But Not Provided** – REX continues to negotiate in good faith with landowners. At this time, REX has agreed to provide additional depths of cover and is unaware of any location where additional depth of cover has not been offered where it has been identified as an issue or concern by the landowner.