October 14, 2013

Via email

Mr. Andrew Stamp, Hearings Officer
c/o Jill Rolfe
Planning Director
Coos County Planning Department
225 North Adams Street
Coquille, OR 97423

RE: PCGP Change of Alignment: HBCU-13-04
Applicant’s Rebuttal re: Proposed Conditions of Approval

Dear Mr. Stamp:

This letter is written on behalf of Williams Pacific Connector Gas Operator, LLC ("Williams") in support of the application by Pacific Connector Gas Pipeline Company, L.P. ("Pacific Connector") to approve two alternative pipeline alignments in File No. HBCU-13-04. As then established, Williams will manage the construction and operation of the PCGP and will manage its day-to-day business affairs as a contractor for the owners.

This letter provides rebuttal regarding potential impacts of the alternative alignments and responds to the Hearings Officer’s invitation to submit proposed conditions of approval. As we noted during the public hearing on this matter on September 20, 2013, many of the concerns voiced by those testifying have already been addressed in the conditions of approval imposed under File No. HBCU-10-01. With reference to the Findings of Fact, Conclusions of Law, and Final Decision of the Coos County Board of Commissioners dated September 8, 2010, and attached as Exhibit A to the Board’s Final Decision and Order No. 10-08-045PL, as modified by the Board’s Final Decision and Order No. 12-03-018PL, we propose the inclusion, exclusion, and modification of the Conditions of Approval set forth in Section III of the Findings of Fact, Conclusions of Law, and Final Decision as indicated on Attachment A, attached hereto and incorporated herein.

Please include this letter and Attachment A as part of the record in this proceeding.

Sincerely,

Richard H. Allan

[Signature]

Richard H. Allan

{00385904.DOC / 1}
ATTACHMENT A

Staff Proposed Conditions of Approval, Final Decision and Order No. 10-08-045PL

1. Exclude (condition was “intentionally deleted”).
2. Include.
3. Include.
4. Exclude. This condition relates to a portion of the approved alignment (MP 13.8 to MP 14.4) not at issue in this proceeding.
5. Include, but without bracketed and italicized references at the end.
6. Include.
7. Exclude (condition was “intentionally deleted”).
8. Exclude; the proposed Brunschmid and Stock Slough alternative alignments are not in close proximity to residences.
9. Include. The Brunschmid alternative crosses the Coos River Highway.
10-13. Include.
14. Include, but without bracketed and italicized references at the end.
15. Include.
16. Exclude (condition was “intentionally deleted”).
17. Include.
18. Include.
19. Exclude; condition relates to Haynes Inlet, which is not part of the alternative alignments proposed in this application.
20. Include.
21. Include.
22. Include, but without bracketed and italicized references at the end.
23. Include, but without bracketed and italicized references at the end.
24. Include.

Applicant’s Proposed Conditions of Approval, Final Decision and Order No. 10-08-045PL

1-3 Include (conditions were “intentionally deleted”).
4. Include.
5. Include.
6. Include, but modify to read: “Any fill and removal activities in Stock Slough shall be conducted within the applicable Oregon Department of Fish and Wildlife in-water work period, unless otherwise modified or agreed to by the Oregon Department of Fish and Wildlife.”
7. Exclude; condition relates to Haynes Inlet, which is not part of the alternative alignments proposed in this application.
8-18 Include.
19. Include, but delete “import” in first sentence and “As detailed in Section 4.12.10 of the FEIS” in the second sentence.
20(a) and (20(b). Modify to a single condition pursuant to the Board’s Order No. 12-03-018PL:

“This approval shall not become effective as to any affected property in Coos County until the Applicant has acquired ownership of an easement or other interest in all properties necessary for construction of the pipeline, and/or obtains the signatures of all owners of the affected property consenting to the application for development of the pipeline in Coos County. Prior to this decision becoming effective, the County shall provide notice and opportunity for a hearing regarding compliance with this condition of approval and the property owner signature requirement. County staff shall make an Administrative Decision addressing compliance with this condition of approval and LDO 5.0.150, as applied in this decision, for all properties where the pipeline will be located. The County shall provide notice of the Administrative Decision as provided in LDO 5.0.900(B) and shall also provide such notice to all persons requesting notice. For purposes of this condition, the public hearing shall be subject to the procedures of LDO 5.8.200 with the Board of Commissioners serving as the Hearings Body.”

21. Include.
22. Exclude (condition was “intentionally deleted”).
23. Include.
24. Include.
25. Include, but modify as requested in staff report for HBCU-13-02: “The conditional use permits approved by this decision shall be used for the transportation of natural gas.”