

UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION

Before Commissioners: Joseph T. Kelliher, Chairman;  
Sudeen G. Kelly, Marc Spitzer,  
Philip D. Moeller, and Jon Wellinghoff.

Cameron Interstate Pipeline, LLC

Docket Nos. CP05-119-002  
CP05-121-002

ORDER AMENDING CERTIFICATES

(Issued December 20, 2006)

1. On August 4, 2006, Cameron Interstate Pipeline, LLC (Cameron Interstate) filed an application under section 7(c) of the Natural Gas Act (NGA), and Parts 157 and 284 of the Commission's regulations, to amend its certificate of public convenience and necessity issued on May 22, 2006.<sup>1</sup> Cameron Interstate seeks the authority to (i) increase the diameter of the pipeline facilities previously authorized by the Commission from 36 inches to 42 inches; (ii) construct an additional 1.1 miles of 42-inch pipeline; (iii) construct facilities to establish three additional pipeline interconnections; (iv) revise its transportation rates to reflect costs for the proposed 1.1 miles of pipeline and three interconnections; and (v) allocate costs to its interruptible transportation services.

**I. Background and Proposal**

2. Cameron Interstate is a limited liability company organized and existing under the laws of the State of Delaware. Cameron Interstate is authorized to conduct business in the State of Louisiana and holds its principal office in San Diego, California. Cameron Interstate is a wholly-owned subsidiary of Sempra Pipelines and Storage Corporation (Sempra Pipelines and Storage). Sempra Pipelines and Storage is a wholly-owned subsidiary of Sempra Energy.

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<sup>1</sup> *Cameron LNG, LLC and Cameron Interstate Pipeline, LLC*, 115 FERC ¶ 61,229 (2006) (*Cameron LNG and Cameron Interstate*). See *Cameron LNG, LLC and Cameron Interstate, LLC*, 111 FERC ¶ 61,490 (2005) (original certificate of public convenience and necessity). Cameron LNG is not a party to this proceeding.

3. On May 30, 2002, Hackberry LNG Terminal, LLC (Hackberry LNG) filed in Docket No. CP02-374-000, *et al.* an application requesting NGA section 3 authorization to construct and operate an LNG terminal and NGA section 7(c) authorization to construct and operate a 34.5-mile long, 36-inch diameter pipeline from the tailgate of the proposed LNG terminal to the Transcontinental Gas Pipe Line Corporation (Transco) compressor station in Beauregard Parish, Louisiana. On December 18, 2002, the Commission issued a preliminary determination on non-environmental issues,<sup>2</sup> finding that subject to the conditions imposed therein, Hackberry LNG's proposal was in the public interest.

4. After issuance of the December 2002 Order, Sempra Energy acquired all of the membership interests of Hackberry LNG and changed the name of the company to Cameron LNG.<sup>3</sup> Cameron LNG acquired the interests of Hackberry LNG and succeeded as project sponsor of both the pipeline and the LNG terminal development projects. Cameron LNG became the applicant in the December 2002 Order.

5. On September 11, 2003, the Commission issued an order<sup>4</sup> pursuant to NGA section 3, authorizing Cameron LNG to site, construct, and operate the LNG terminal. The order also authorized Cameron LNG to construct, own, and operate the 35.4-mile long, 6-inch diameter takeaway pipeline under NGA section 7(c).<sup>5</sup> The September 2003 Order issued a Part 284 Subpart G blanket transportation certificate and a Part 157 Subpart F blanket construction certificate to Cameron LNG.

6. On June 27, 2005, the Commission issued an order,<sup>6</sup> authorizing the intra-corporate transfer of the pipeline certificate authority originally issued to Cameron LNG in Docket Nos. CP02-374-000, *et al.* to Cameron Interstate. In the June 2005 Order, in Docket No. CP05-119-000, Cameron Interstate was authorized to construct, own, operate, and maintain the 35.4-mile long, 36-inch diameter pipeline facility and to

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<sup>2</sup> *Hackberry LNG*, 101 FERC ¶ 61,294 (2002).

<sup>3</sup> On May 12, 2003, Cameron LNG filed a letter with the Commission explaining the change in ownership.

<sup>4</sup> *Cameron LNG*, 104 FERC ¶ 61,269 (2003).

<sup>5</sup> See *Hackberry LNG*, 101 FERC ¶ 61,294 at P 4-6 (2002) for a complete description of the proposed facilities.

<sup>6</sup> *Cameron LNG and Cameron Interstate*, 111 FERC ¶ 61,490 (2005).

provide interstate pipeline transportation services subject to the same rates, terms, and conditions as were contained in the original Cameron LNG certificate authorizations.<sup>7</sup> In addition, in Docket No. CP05-121-000, Cameron Interstate was issued blanket certificates pursuant to Part 157 and Part 284 of the Commission's regulations.

7. On May 22, 2006, the Commission issued an order,<sup>8</sup> which amended the certificate of public convenience and necessity issued to Cameron Interstate in the June 2005 Order to modify the original pipeline design and updating the initially authorized rates. The May 2006 Order affirmed the previously certificated 1.5 Bcf/d capacity of the facilities.<sup>9</sup>

8. On August 4, 2006, Cameron Interstate filed an application to further amend its certificate, proposing to (i) increase the diameter of the pipeline facilities from 36 inches to 42 inches, (ii) construct an additional 1.1 miles of 42-inch diameter pipeline, (iii) construct facilities to establish three additional pipeline interconnections, (iv) revise its transportation rates to reflect the proposed 1.1 miles of pipeline and the three new interconnections, and (v) allocate costs to its interruptible transportation services.<sup>10</sup>

## **II. Notices and Interventions**

9. Notice of Cameron Interstate's petition to amend in Docket Nos. CP05-119-002 and CP05-121-002 was published in the *Federal Register* on August 30, 2006.<sup>11</sup> Florida Gas Transmission Company (FGT) and ENI USA Gas Marketing, LLC (ENI) filed

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<sup>7</sup> See *Cameron LNG*, 104 FERC ¶ 61,269 (2003) and *Hackberry LNG*, 101 FERC ¶ 61,294 (2002).

<sup>8</sup> *Cameron LNG, LLC and Cameron Interstate Pipeline, LLC*, 115 FERC ¶ 61,229 (2006).

<sup>9</sup> *Id.* at P 10-16 for a more complete description of the project's authorized modifications.

<sup>10</sup> On October 16, 2006, Cameron Interstate supplemented its application to correct certain exhibits.

<sup>11</sup> 71 *Fed. Reg.* 51,592.

timely motions to intervene.<sup>12</sup> No other motions to intervene, or adverse comments or protests, have been filed.

### **III. Discussion**

10. Cameron Interstate's proposal involves the construction and operation of facilities that will be used to transport natural gas in interstate commerce and thus the proposal is subject to the jurisdiction of the Commission and the requirements of sections 7(c) and (e) of the NGA.

11. The Commission has previously found the proposed project to be in the public interest.<sup>13</sup> In doing so, the Commission evaluated the proposal under the criteria of the Commission's policy regarding new facilities.<sup>14</sup> The Commission finds herein that the increase in pipeline diameter will have no adverse impact on customers, competitors, or the environment. The Commission also finds that the 1.1 mile extension of the pipeline and the construction of three interconnects will have no adverse impact on customers or competitors, and will have a minimal impact on the environment. Furthermore, there are no existing shippers on the pipeline system, and no harm to prospective shippers is expected arise as a result of the proposed project. We therefore find that Cameron Interstate's proposal meets the requirements of our Policy Statement on New Facilities and is required by the public convenience and necessity. Consequently, we will approve the proposal, as modified and conditioned below.

#### **A. Increase in Pipe Diameter**

12. Cameron Interstate seeks authorization to increase the diameter of its pipeline from 36 inches to 42 inches. Cameron Interstate claims that the increase in pipe diameter

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<sup>12</sup> Timely, unopposed motions to intervene are granted by operation of Rule 214 of the Commissions Rules of Practice and Procedure. 18 C.F.R. § 385.214 (2006).

<sup>13</sup> See *Cameron LNG and Cameron Interstate*, 115 FERC ¶ 61,229 at P 22 (2006); *Cameron LNG*, 104 FERC ¶ 61,269 at P 32 (2003); and *Hackberry LNG*, 101 FERC ¶ 61,294 at P 3, 42 (2002).

<sup>14</sup> *Certification of New Interstate Natural Gas Pipeline Facilities (Policy Statement on New Facilities)*, 88 FERC ¶ 61,227 (1999), *orders clarifying statement of policy*, 90 FERC ¶ 61,128 and 92 FERC ¶ 61,094 (2000).

will minimize the costs of adding a planned 60-mile extension of the pipeline<sup>15</sup> and will have minimal initial and future environmental impacts. By increasing the pipeline diameter, Cameron Interstate expects to avoid the need to install compression or looping facilities in the event it constructs a 60-mile extension, because the 42-inch diameter pipe will enable Cameron Interstate to transport at least 1.5 Bcf/d on a “free-flow” basis to an interconnection with Columbia Gulf.

13. Cameron Interstate does not propose to make any adjustments to its rates to reflect the costs associated with the increase in pipe diameter from 36 to 42 inches. Cameron Interstate may seek to have the costs associated with the larger pipe reflected in its maximum tariff rates at the time it files an application to construct the 60-mile extension to Columbia Gulf, however, until Cameron Interstate seeks and receives approval for such rate treatment, it will assume the risk for the increased costs.

14. The Commission finds that the proposed increase in the pipe’s diameter would not result in any additional environmental impacts beyond those identified and analyzed in the Environmental Impact Statement in the Hackberry LNG proceeding. Cameron Interstate’s proposed expansion would not change the previously approved 100-foot-wide nominal construction right-of-way. The Commission accepts Cameron Interstate’s assertion that installation of the 42-inch pipe will avoid the need to install additional compression or looping if Cameron Interstate subsequently seeks to construct an additional 60-mile extension to interconnect with Columbia Gulf. Also, to the extent such a proposal reduces fuel costs, we look favorably on such action. Any resulting environmental impacts from the increase in pipe diameter will be minimal in comparison with the construction and operation of a compression station.

15. For these reasons the Commission finds that authorizing construction of the larger diameter pipeline at this time will be consistent with the public interest, subject to conditions set forth in the appendix to this order.

#### **B. Extension of Previously-Authorized Pipeline**

16. Cameron Interstate proposes to modify its previously-authorized pipeline facilities by constructing an additional 1.1 miles of 42-inch pipeline. The pipeline facilities

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<sup>15</sup> As a result of market demand, Cameron Interstate states that it plans to seek future approval from the Commission to construct an additional pipeline segment extending approximately 60 miles to an interconnection with Columbia Gulf Transmission Co. (Columbia Gulf) near Belair Cove, Evangeline Parish, Louisiana.

approved in the June 2005 Order consist of 35.4 miles of 36-inch pipeline that extend from the Cameron LNG terminal in Cameron Parish, Louisiana, to an interconnection with Transco's Compressor Station No. 45 in Beauregard Parish, Louisiana. The additional 1.1 miles of pipeline will extend from the current terminus of the pipeline near Transco's Compressor Station No. 45 to the site of a remote compressor station owned and operated by Liberty Gas Storage, LLC (Liberty).<sup>16</sup>

17. The 1.1 mile extension will enable Cameron Interstate to interconnect with two interstate pipelines, Transco and Texas Eastern Transmission LP (Texas Eastern), at a single location. Cameron Interstate had planned to interconnect with both of these pipelines upstream of the proposed site. However, each of the upstream locations would have involved a separate location for piping, metering, and other facilities necessary for establishing an interconnection. The proposed interconnections will avoid the disturbance of two new sites and will allow the metering and other facilities for the two interconnections to be in a single location currently owned by Liberty. The proposed area is already dedicated to gas pipeline and storage operations and contains enough space for the new interconnections.

18. Cameron Interstate states that the 1.1 mile extension will not only avoid the disturbance of two upstream locations, but it will also provide operational benefits to Cameron Interstate by minimizing the number of separate interconnections that must be operated and maintained. The Commission finds that the proposed 1.1 miles of pipe would constitute the only additional environmental impact associated with the proposed project. The proposed 1.1 miles of pipe would mostly be within open and agricultural land uses that would revert back to its existing state after construction. The proposed 1.1 mile extension would parallel the route of a pipeline already under construction, owned and operated by Liberty, and would utilize a portion of the right-of-way already obtained by Liberty. Therefore, the Commission finds that authorizing the construction of an additional 1.1 miles of 42-inch pipeline will be consistent with the public interest, subject to the conditions set forth herein.

### **C. Three Additional Pipeline Interconnections**

19. Cameron Interstate requests authorization to construct facilities to interconnect with three additional pipeline companies, Texas Eastern, Florida Gas Transmission

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<sup>16</sup> Liberty is an affiliate of Cameron Interstate and is currently constructing pipeline and storage facilities authorized by the Commission. *See Liberty*, 113 FERC ¶ 61,247 (2005).

Company (FGT), and Tennessee Gas Pipeline Company (Tennessee Gas). Cameron Interstate states that these interconnections will afford its shippers greater flexibility by providing additional supply and delivery options. Cameron Interstate asserts that the three proposed interconnections would cause minimal environmental impacts. The Commission agrees, because construction of the proposed interconnects would occur during the same time as the construction of the proposed pipeline and would occur within the proposed construction right-of-way.<sup>17</sup> For the reasons stated above, the Commission finds construction of the proposed interconnects will be consistent with the public interest, subject to the conditions set forth herein.

**D. Adjustment of Maximum Tariff Rates and Allocation of Interruptible Services**

20. Cameron Interstate requests an adjustment to its maximum tariff rates to reflect an increase in costs of approximately \$9.8 million associated with the additional 1.1 miles of pipeline and the three new interconnections it seeks to construct.<sup>18</sup> Cameron Interstate clarifies that it is not seeking to increase the throughput of its facilities, but is requesting modifications to facilitate operational flexibility and efficiency in the event of a future extension of its pipeline. The May 2006 Order approved Cameron Interstate's request to increase the wall thickness of its pipeline, which would physically enable Cameron Interstate to transport 2.3 Bcf/d. However, Cameron Interstate stresses that it does not seek to expand its presently authorized 1.5 Bcf/d of capacity.

21. Cameron Interstate does not propose to make any adjustments to its rates to reflect the proposed increase in its pipeline's diameter. However, the Commission will require that Cameron Interstate must file a report detailing any costs and expenses incurred as a result of constructing and operating the proposed 42-inch pipeline, instead of the

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<sup>17</sup> The proposed interconnection with Texas Eastern will be located at the site of the Liberty compressor station; the proposed interconnections with FGT and Tennessee Gas will be located on the right-of-way for the previously-authorized 35.4 miles of pipeline and on Liberty's adjacent right-of-way.

<sup>18</sup> See Cameron Interstate's Application in Docket No. CP05-119-001, Capital Cost Estimates, Exhibit K, which reflects a cost of \$105,269,871 versus the \$115,057,952 reflected in the application in Docket No. CP05-119-002.

originally proposed 36-inch pipeline.<sup>19</sup> Therefore, in tandem with Ordering Paragraph (H) of the May 2006 Order, which requires Cameron Interstate to make a filing to justify its existing cost-based firm and interruptible recourse rates within three years after its in-service date, Cameron Interstate must also file at the same time the aforementioned costs and expenses report in regard to the proposed increase in pipeline diameter.

22. Cameron Interstate requests that the Commission allow it to allocate costs to the interruptible transportation service it provides under Part 284 of the Commission's regulations. Initially, in the May 2006 Order, Cameron Interstate proposed to credit 90 percent of revenues from Interruptible Transportation Service (ITS) and Authorized Overrun Service (AOS) to firm shippers. However, the Commission rejected this request, stating that it did not comply with Commission policy.<sup>20</sup> In accordance with Commission's policy referenced in the May 2006 Order, Cameron Interstate proposes to allocate three percent of its costs to interruptible services offered under Rate Schedule ITS-1. Cameron Interstate filed revised *pro forma* tariff sheets<sup>21</sup> to reflect this allocation of costs to interruptible transportation services. The revised *pro forma* tariff sheets are consistent with the Commission's recent decisions regarding allocation of costs to interruptible services for new pipeline projects.<sup>22</sup>

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<sup>19</sup> The report must include construction costs and operating expenses associated with the proposed 42-inch pipeline, which would not have been incurred if the originally proposed 36-inch pipeline was constructed and operated. The Commission notes Cameron Interstate's intent to construct a 60-mile extension in the future. If it does so, proper accounting records for costs and expenses associated with the extension project will be necessary to reach a decision regarding the appropriate rate treatment.

<sup>20</sup> *Cameron LNG and Cameron Interstate*, 115 FERC ¶ 61,229 at P 27 (2006) ("The Commission's policy regarding new interruptible services requires either a 100 percent credit of the interruptible revenues, net variable of costs, to firm and interruptible shippers or an allocation of costs and volumes to these services"). See, e.g., *Tractebel Calypso Pipeline, LLC*, 106 FERC ¶ 61,273 (2004).

<sup>21</sup> See Cameron Interstate's Supplement to Application (October 16, 2006).

<sup>22</sup> See *San Patricio Pipeline, LLC*, 103 FERC ¶ 61,101 (2005); *AES Ocean Express, LLC*, 103 FERC ¶ 61,030 (2003); and *Millennium Pipeline Company, LP*, 100 FERC ¶ 61,277 (2002) -- all approving allocations ranging from below two percent up to five percent.

23. Using the rate design methodology previously approved in the May 2006 Order to derive its initial rates, and relying on a revised total annual cost of service of \$30,985,640,<sup>23</sup> Cameron Interstate derived the proposed Firm Transportation Service (FTS) rates using an estimated \$30,056,071 annual cost of service, and an ITS rate using an estimated \$929,569 annual cost of service, based on three percent of costs allocated to interruptible transportation services. Accordingly, the revised proposed maximum cost-based FTS reservation rate is \$1.61 per Dth<sup>24</sup> and the revised ITS rate is \$0.0528 per Dth.

24. The Commission finds that Cameron Interstate's proposed cost of service and proposed FTS and ITS rates, as discussed more fully above, are reasonable for a new pipeline entity, subject to the conditions specified herein and in the May 2006 Order.

#### **IV. Environmental Analysis**

25. The Commission staff prepared an environmental assessment (EA) for Cameron Interstate's proposal. The EA addresses land requirements, water use and quality, fish, vegetation, wildlife, cultural resources, air quality, noise quality, land use, and alternatives.<sup>25</sup> Based on the discussion in the EA, the Commission concludes that if constructed in accordance with Cameron Interstate's application and the conditions in the appendix to this order, approval of this proposal would not constitute a major federal action significantly affecting the quality of the human environment.

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<sup>23</sup> Cameron Interstate's proposed year 1 \$30,985,640 cost of service includes a \$901,995 operation and maintenance expense, a \$1,648,357 administrative and general expense, a \$5,752,898 depreciation expenses (at a five percent depreciation rate), a \$12,123,104 return allowance, a combined \$5,420,380 in federal and state income taxes (calculated at a tax rate of 35 percent for federal taxes and eight percent for Louisiana state taxes), and \$5,138,906 in taxes other than income taxes. The cost of service includes the costs associated with the proposed 1.1 miles of pipeline and three interconnects, but does not include costs associated with Cameron Interstate's proposed increase in pipeline diameter to 42 inches.

<sup>24</sup> The proposed FTS usage rate is \$0 per Dth, as also previously approved in the May 2006 Order.

<sup>25</sup> The EA was entered into public file for this proceeding on October 12, 2006.

26. Any state or local permits issued with respect to the jurisdictional facilities authorized herein must be consistent with the conditions of this certificate. The Commission encourages cooperation between interstate pipelines and local authorities. However, this does not mean that state and local agencies, through application of state or local laws, may prohibit or unreasonably delay the construction of facilities approved by this Commission.<sup>26</sup> Cameron Interstate shall notify the Commission's environmental staff by telephone, e-mail, or facsimile of any environmental noncompliance identified by other federal, state, or local agencies on the same day that such agency notifies Cameron Interstate. Cameron Interstate shall file written confirmation of such notification with the Secretary of the Commission within 24 hours.

The Commission orders:

(A) The certificates issued in Docket Nos. CP05-119-000 and CP05-121-000, as amended, pursuant to NGA section 7(c), authorizing Cameron Interstate to construct and operate pipeline facilities, are further amended, as described and conditioned herein and as more fully described in the application. In all other respects, the certificate authorizations remain in full force and effect.

(B) Cameron Interstate must comply with the environmental conditions set forth in this order and in the June 27, 2005 and the May 22, 2006 Orders.

(C) In addition to compliance with Ordering Paragraph (H) of the May 22, 2006 Order, requiring Cameron Interstate to make a filing to justify its existing cost-based firm and interruptible recourse rates within three years after its in-service date, Cameron Interstate must file a report detailing the costs and expenses incurred as a result of constructing the 42-inch pipeline.

(D) The new tariff and initial rates proposed by Cameron Interstate are approved, as conditioned and modified herein.

(E) The proposed Rate Schedule FTS and Rate Schedule ITS are approved as discussed in the body of this order.

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<sup>26</sup>See, e.g., *Schneidewind v. ANR Pipeline Co.*, 485 U.S. 293 (1988); *National Fuel Gas Supply v. Public Service Commission*, 894 F.2d 571 (2d Cir. 1990); and *Iroquois Gas Transmission System, L.P.*, 52 FERC ¶ 61,091 (1990) and 59 FERC ¶ 61,094 (1992).

(F) Construction of Cameron Interstate's facilities, authorized as amended herein, shall be completed consistent with Ordering Paragraph (C) of the May 22, 2006 Order, thus requiring Cameron Interstate to complete work on its pipeline facilities within three years from the date of that order in accordance with section 157.20(b) of the Commission's regulations.

By the Commission.

( S E A L )

Magalie R. Salas,  
Secretary.

## Appendix

### **Environmental Conditions for Cameron Interstate's Proposals in Docket No. CP05-119-002**

This is an amendment to the Commission's order issued on September 11, 2003 in Docket No. CP02-374-000, and all conditions set forth in that order apply to the increase in pipeline diameter and the 1.1-mile-long extension. For example, environmental inspectors (EIs) and bi-weekly status reports, as were required by the September 2003 Order remain required with respect to the facilities authorized in this order. In addition, as recommended in the attached Environmental Assessment (EA), this authorization includes the following conditions:

1. Cameron Interstate shall follow the construction procedures and mitigation measures described in its application, as supplemented, and as identified in the EA, unless modified by this order. Cameron Interstate must:
  - a. request any modification to these procedures, measures, or conditions in a filing with the Secretary of the Commission (Secretary);
  - b. justify each modification relative to site-specific conditions;
  - c. explain how that modification provides an equal or greater level of environmental protection than the original measure; and
  - d. receive approval in writing from the Director of the Office of Energy Projects (OEP) before using that modification.
  
2. The Director of OEP has delegated authority to take whatever steps are necessary to ensure the protection of all environmental resources during construction and operation of the project. This authority shall allow:
  - a. the modification of conditions of this order; and
  - b. the design and implementation of any additional measures deemed necessary (including stop work authority) to assure continued compliance with the intent of the environmental conditions as well as the avoidance or mitigation of adverse environmental impact resulting from the project's construction and operation.
  
3. **Prior to any construction**, Cameron Interstate shall file an affirmative statement with the Secretary, certified by a senior company official, that all company personnel, EIs, and contractor personnel will be informed of the EIs' authority and

have been or will be trained on the implementation of the environmental mitigation measures appropriate to their jobs before becoming involved with construction and restoration activities.

4. The authorized facility location shall be as shown in the EA, as supplemented by filed alignment sheets. **As soon as they are available, and before the start of construction,** Cameron Interstate shall file with the Secretary any revised detailed survey alignment maps/sheets at a scale not smaller than 1:6,000 with station positions for the facilities approved by this order. All requests for modifications of environmental conditions of this order or site-specific clearances must be written and must reference locations designated on these alignment maps/sheets.

Cameron Interstate's exercise of eminent domain authority granted under Natural Gas Act (NGA) section 7(h) in any condemnation proceedings related to this Order must be consistent with the authorized facilities and location. Cameron Interstate's right of eminent domain granted under NGA section 7(h) does not authorize it to increase the size of its natural gas pipeline to accommodate future needs or to acquire a right-of-way for a pipeline to transport a commodity other than natural gas.

5. Cameron Interstate shall file with the Secretary detailed alignment maps/sheets and aerial photographs at a scale not smaller than 1:6,000 identifying all route realignments or facility relocations, and staging areas, pipe storage yards, new access roads, and other areas that would be used or disturbed and have not been previously identified in filings with the Secretary. Approval for each of these areas must be explicitly requested in writing. For each area, the request must include a description of the existing land use/cover type, and documentation of landowner approval, whether any cultural resources or federally listed threatened or endangered species would be affected, and whether any other environmentally sensitive areas are within or abutting the area. All areas must be clearly identified on the maps/sheets/aerial photographs. Each area must be approved in writing by the Director of OEP **before construction in or near that area.**

This requirement does not apply to extra workspace allowed by Cameron Interstate's project-specific Upland Erosion Control, Revegetation, and Maintenance Plan or minor field realignments per landowner needs and requirements which do not affect other landowners or sensitive environmental areas such as wetlands.

Examples of alterations requiring approval include all route realignments and facility location changes resulting from:

- a. implementation of cultural resource mitigation measures;
  - b. implementation of endangered, threatened, or special concern species mitigation measures;
  - c. recommendations by state regulatory authorities; and
  - d. agreements with individual landowners that affect other landowners or could affect sensitive environmental areas.
6. Cameron Interstate must receive written authorization from the Director of OEP **before commencing service** from the project. Such authorization will only be granted following a determination that rehabilitation and restoration of the right-of-way and other areas affected by the project are proceeding satisfactorily.
7. Within 30 days of placing the certificated facility in service, Cameron Interstate shall file an affirmative statement with the Secretary, certified by a senior company official:
- a. that the facility has been constructed in compliance with all applicable conditions, and that continuing activities will be consistent with all applicable conditions; or
  - b. identify which of the certificate conditions Cameron Interstate has complied with or will comply with. This statement shall also identify any areas affected by the project where compliance measures were not properly implemented, if not previously identified in filed status reports, and the reason for noncompliance.
8. The construction right-of-way width shall not exceed 100 feet through the wetland near milepost 0.1 of the Cameron Interstate Pipeline Amendment Project without written site-specific approval by the Director of OEP.
9. Cameron Interstate shall defer construction of the 1.1-mile-long extension and use of associated facilities and temporary work areas **until**:
- a. Cameron Interstate files the Louisiana State Historic Preservation Office's (SHPO) comments on the "Phase I Addendum C" summary report;
  - b. Cameron Interstate files any required additional survey report, and the SHPO's comments on the report; and
  - c. the Director of OEP reviews and approves any report and notifies Cameron Interstate in writing that it may proceed.

All material filed with the Commission containing location, character, and

ownership information about cultural resources must have the cover and any relevant pages therein clearly labeled in bold lettering: "**CONTAINS PRIVILEGED INFORMATION--DO NOT RELEASE.**"