

MSTOPSDOC48

NORTHWEST



NATURAL GAS COMPANY

ONE PACIFIC SQUARE
220 N.W. SECOND AVENUE · PORTLAND, OREGON 97209

CARLA LOUISE KELLEY
Associate Counsel
(503) 220-2403
Fax (503) 721-2516

August 1, 1997

Mr. Adam Bless
Energy Facility Siting Council

By HAND DELIVERY

Re: Minor Pipeline Change in Mist Expansion

Dear Mr. Bless:

As we discussed earlier this week by telephone, Longview Fibre, the owner of the right of way for a portion of the Mist 8 inch gathering lines, has requested Northwest Natural Gas Company ("NNG") to make a minor change in the pipeline route on its property. The proposed route is drawn on the map that is Attachment A.

Amendment No. 4 to the Site Certificate states under Structural and Soils Standards that

(1) The pipeline corridor shall be substantially as shown on Figure G-1 of Exhibit 10 of the Application for Amendment. Significant changes in pipeline corridor shall require prior Council approval.

The term "substantial" is not defined in the EFSC regulations. The term "significant" is defined at OAR 345-01-010(43):

"Significant" means having an important consequence, either alone or in combination with other factors, based upon the magnitude and likelihood of the impact on the affected human population or natural resources, or on the importance of the natural resource affected, considering the context of the action or impact, its intensity and the degree to which possible impacts are caused by the proposed

action. Nothing in this definition is intended to require a statistical analysis of the magnitude or likelihood of a particular impact.

The permitted route makes a curve to follow an existing logging road on Longview Fibre's ("Longview") property. NNG selected that route because in the past, Longview has insisted that pipelines follow existing logging roads. However, in this case, Longview requests that the more direct and shorter route be followed cross-country on its property. NNG will have to build a new all weather road along the proposed route in any case for permanent access to one of the observation well pads for Calvin Creek. Longview would like NNG to realign the parallel 8 inch gathering lines to place them along this access road, thus minimizing permanent right of way on their property. This would also be more economical because it is shorter and closer to the well pads.

NNG would like to follow Longview's proposed route. The proposed route straightens out the right of way corridor and shortens the total right of way and resultant pipeline installation length by 369 feet. The proposed route will deviate by approximately 157 feet up to 343 feet from the 200 foot corridor. The deviation is about 1/4 mile in length. A new legal description for this portion of the pipeline is Attachment B to this letter.

Attachment C is a letter from Doug Schwarm with Geo Engineers. Mr. Schwarm conducted the original geologic and soils investigation of the entire project when he was employed by Dames & Moore. Mr. Schwarm confirms that there are no geologic hazards in this realignment. In addition, this alignment does a better job of promoting hillside safety by traversing up and down slopes perpendicular to contour lines to minimize the effects of any land movement on the pipeline. The map at Attachment A shows the contour lines.

With regard to Fish and Wildlife standards, the proposed realignment actually improves the route by avoiding disturbances of two minor wetlands, labeled Wetlands 4 and 5 in NNG's Application. See Attachment A. The change would place the parallel 8 inch lines through an area of regenerating clearcuts, the same terrain as the former route next to the logging road. Both routes run through regenerating clearcuts on private timber land tree farms. Thus the impact of the change will be insignificant on habitat and actually an improvement from the standpoint of eliminating disturbance on the wetlands.

In summary, the proposed route has several advantages. First, it will comport with the wishes of Longview, the right of way owner. Second, it will avoid two wetland areas. Third, the proposed route is straighter, shorter, easier to construct and will ease future maintenance. Fourth, less land will be disturbed because the pipeline corridor on the new route will become the permanent wellhead access. And fifth, the proposed route does a better job than the permitted route of traversing up and down the slopes.

Thus after examination of the route by NNG engineers and environmental specialist, and a geologic consultant familiar with the project, we believe the deviation is minor and does not constitute a substantial deviation from the Site Certificate. We also believe that there will be no significant impacts to EFSC standards.

We invite EFSC staff to visit the site and understand that you intend to do so on August 4. We are now clearing brush for the project and would like your concurrence as soon as possible that this minor deviation does not require prior Council approval. We look forward to hearing from you at your earliest convenience.

Very truly yours,

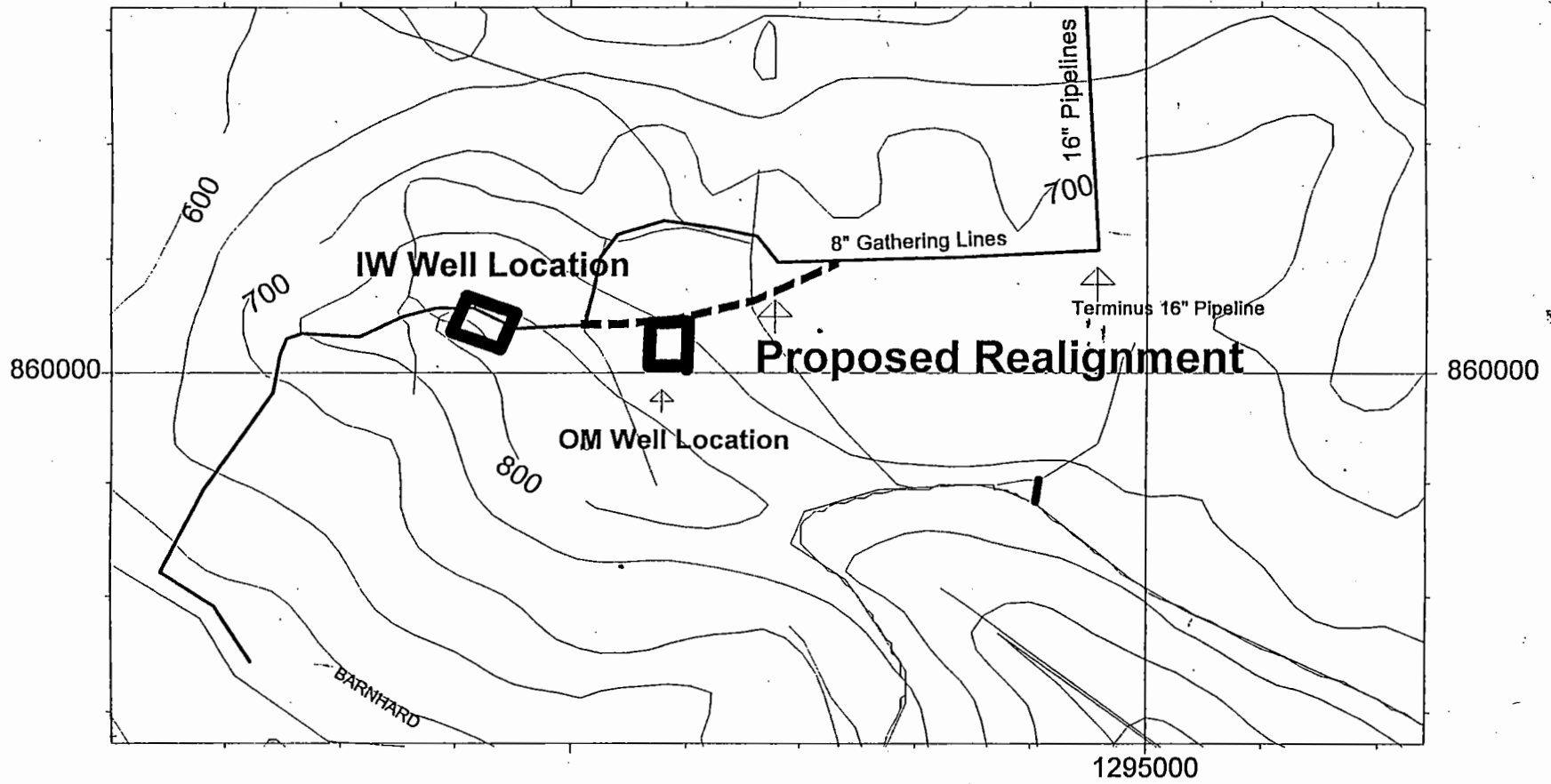
A handwritten signature in cursive script, appearing to read "Carla L. Kelley", with a long horizontal flourish extending to the right.

Carla L. Kelley

cc: David Stewart Smith

XY :

1295000



Northwest Natural Gas Co
Calvin Creek Phase I
Proposed 8" Gathering Lines Realignment

A

EXHIBIT "D"
GAS UTILITY EASEMENT

GRANTOR: LONGVIEW FIBRE COMPANY
GRANTEE: NORTHWEST NATURAL GAS CO.

A 40 foot wide gas easement being 20 feet on each side of the following described centerline located in Section 22, Township 6 North, Range 5 West, Willamette Meridian, Columbia County, Oregon:

Beginning at a point on the East line of Section 22, Township 6 North, Range 5 West, Willamette Meridian, Columbia County, Oregon which is South $01^{\circ}23'16''$ West, 108.87 feet from the Southeast corner of the Northeast quarter of the Northeast quarter of said Section 22; thence South $75^{\circ}35'08''$ West, a distance of 353.37 feet; thence South $80^{\circ}51'37''$ West, a distance of 244.67 feet; thence South $73^{\circ}25'17''$ West a distance of 719.96 feet; thence North $76^{\circ}20'30''$ West, a distance of 93.48 feet; thence North $89^{\circ}04'30''$ West a distance of 698.33 feet; thence North $76^{\circ}02'54''$ West, a distance of 222.78 feet; thence North $76^{\circ}02'54''$ West a distance of 184.23 feet; thence South $79^{\circ}55'26''$ West, a distance of 225.03 feet to a point on the West line of the Northeast quarter of said Section 22, which is South $02^{\circ}11'23''$ West, 1813.49 feet from the North quarter corner of said Section 22 and the end of said easement.

Being 2,741.85 feet in length.

August 1, 1997

N97-12IAGA

B

August 1, 1997

Consulting Engineers
and Geoscientists
Offices in Washington,
Oregon, and Alaska

Northwest Natural Gas
220 Northwest Second Avenue
Portland, Oregon 97209

Attention: Mr. Warren D. Harris

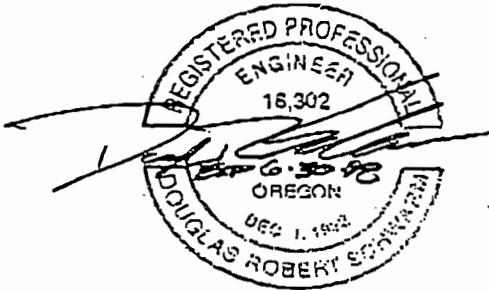
Proposed Realignment Plan
Calvin Creek Gas Pool Pipeline
Mist Gas Storage Project
Mist, Oregon
File No. 6024-001-43

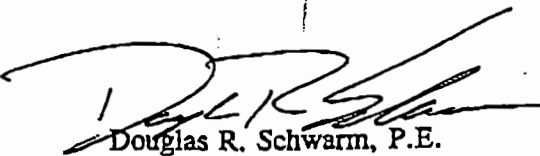
In accordance with your request, GeoEngineers has reviewed the proposed realignment plan for the Calvin Creek gathering line near Mist, Oregon. We also reviewed the geotechnical report for this site prepared by Dames & Moore. Todd Thomas and I evaluated this alignment while we were at the site selecting preliminary well site locations. Based on the geologic reports and my previous site reconnaissance, there do not appear to be any geologic hazards affecting the planned realignment.

We appreciate the opportunity to be of continued service. Please call if we can be of further assistance.

Yours very truly,

GeoEngineers, Inc.




Douglas R. Schwarm, P.E.

Senior Engineer

DRS:mln
Document ID: 60240011.rap

GeoEngineers, Inc.
7504 SW Bridgeport Road
Portland, OR 97224
Telephone (503) 624-9274
Fax (503) 620-5940

C

August 4, 1997

Carla Kelley
Northwest Natural Gas
220 NW 2nd Ave.
Portland OR 97209

DEPARTMENT OF
ENERGY

Dear Ms. Kelley,

On August 1, 1997 you requested a minor change in the pipeline route for the Calvin Creek Storage Project ("Project"). The line in question is a section of the eight inch gathering line approximately 1/4 mile long. Amendment No 4 to the Mist Site Certificate states that significant changes in the pipeline corridor require prior Council approval. You stated the proposed change is not significant, and have asked for OOE concurrence.

We reviewed the information you provided about this section of line, and I visited the site on August 4 to see the new alignment. The pipeline corridor approved in Amendment No 4 follows a logging road through land owned by Longview Fibre. A section of the corridor is curved to follow the logging road through two intermittent wetlands (described as Wetlands 4 and 5 in the Council's Order Approving Amendment dated July 21, 1997). You wish to straighten out the corridor route, at the request of Longview Fibre. The new route will not follow the old logging road. It would avoid the two wetlands and go instead through a regenerating clearcut.

We concur with your assessment that the proposed alignment change is not significant as defined in OAR 345-01-010(45). The change will not have an important consequence or impact on the public or on any resource addressed by the Council's standards. The change will not affect fish and wildlife habitat because the section of pipeline is very short and goes through regenerating clearcuts, which have been characterized elsewhere along the alignment as Habitat category 4 (low value). The change does not impact any protected area. The change avoids an intermittent wetland which was previously in the pipeline corridor. The change does not increase the likelihood or consequences of a pipeline break or leak because it runs perpendicular to the slope of the terrain, minimizing the stress on the pipeline from any potential land movement. The landowner is unchanged, and there are no changes in Land Use permits. Other Council standards are not affected by this change.

We conclude the proposed change is not significant and can be made without prior Council approval. The conditions and NNG commitments in Amendment No. 4 and the Council's Final Order will continue to apply. The legal description of the Project Site that is attached to your August 1, 1997 letter will be attached to the Site Certificate.

Sincerely,



Adam Bless
Oregon Office of Energy

John A. Kitzhaber
Governor



625 Marion Street NE
Salem, OR 97310
(503) 378-4040
FAX (503) 373-7806
Toll-Free 1-800-221-8035