



Gerl D. Huser, Chair
Richard W. Lozier, Jr., Board Member
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April 15, 2021

Ms. Katelyn Lynch-Butcher
Attorney
MidAmerican Energy Company
666 Grand Avenue, Suite 500
Des Moines, IA 50306-0657

Subject: Staff Review Letter Pipeline Permit, under Docket No. P-0831

Dear Ms. Lynch-Butcher,

On January 28, 2021, MidAmerican Energy Company (MidAmerican) filed a petition within Docket No. P-0831 requesting renewal of Permit No. 1180. IUB staff reviewed the filings and identified the following questions and corrections that must be made:

1. Exhibit A
 - a. Please change from "public road" to "public right-of-way for road (...)" for the following:
 - i. Page 1
 1. Line 9: "public road (St Joes Prairie Road)";
 2. Line 10: "public road (Skyline Road)".
 3. Line 22: "a public road (Haxbylane Road)";
 4. Line 25: "a public road (Decker Lane)";
 5. Line 29: "a public road (Arensdorf Road)";
 6. Line 32: "a public road (300 Street)".
 - ii. Page 2
 1. Line 6: "a public road (283 Street)";
 2. Line 11: "a public road (267 Street)";
 3. Line 16: "a public road (Bellevue-Cascade Road)".
 4. Line 23: "a public road (216 Avenue);
 5. Line 31: "a public road (167 Street);
 6. Line 33: "a public road (150 Street)".
 7. Line 38: "a public road (134 Street)";
 8. Line 41: "a public road (234 Avenue);
 9. Please change from "two public roads" to "public rights-of-way for two roads (117 Street and 233 Avenue)";
 - iii. Page 3
 1. Line 5: "a public road (Rockdale Road)".
 2. Line 8: "a public road (Iowa Highway 62)";
 3. Line 11: "a public road (Dark Hollow Road)";
 4. Line 15: "a public road (35 Street);
 - iv. Page 4
 1. Line 10: "a public road (260 Avenue)";
 2. Line 16: "a public road (140 Street)".

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3. Line 19: "a public road (290 Street);
 4. Line 22: "a public road (155 Street);
 5. Line 25: "a public road (270 Avenue);
 6. Line 30: "a public road (175 Street);
 7. Line 34: "a public road (190 Street).
 8. Line 38: "a public road (210 Street);
- v. Page 5
1. Line 5: "a public road (290 Avenue).
 2. Line 5: "a public road (230 Street);
 3. Line 10: "a public road (245 Street);
 4. Line 21: "a public road (262 Street);
 5. Line 25: "crossing public road (270 Street);
- vi. Page 6
1. Line 8: "crossing public road (310 Street);
 2. Line 17: "a public road (280 Street);
 3. Line 25: "a public road (200 Avenue);
 4. Line 12: "crossing public road (300 Street).
 5. Line 14: "a public road (290 Street);
 6. Line 35: "a public road (240 Street).
 7. Line 40: "a public road (230 Street);
 8. Line 44: "a public road (210 Street).
- vii. Page 7
1. Line 1: "a public road (210 Street). Please see 3.g.xv;
 2. Line 8: "a public road (Veterans Memorial Parkway);
 3. Line 10: "last said public road", also known as Eastern Avenue;
 4. Line 13: "a public road (Parkview Lane);
 5. Line 15: "a public road (Olde Brandy Lane);
- b. Please change from "highway road" to "public right-of-way for highway (...)" for the following:
1. Page 1, Line 19: "public highway (US Highway 61)";
 2. Page 3, Line 20: "a public highway (Iowa Highway 64)";
 3. Page 4, Line 8: "a public highway (Iowa Highway 136)";
 4. Page 5, Line 19: "crossing public highway (U.S. Highway 30);
 5. Page 7, Line 6: "last said interstate highway";
- c. Please change from "foreign pipeline" to "private right-of-way for a foreign pipeline (...)" for the following:
- i. Page 1
 1. Line 19: "a foreign pipeline (Enterprise Products Operating, LLC)". Also, please note 3.c.;
 2. Line 29: "foreign pipeline (Northern Natural Gas Company)";
 3. Line 32: "foreign pipeline (Northern Natural Gas Company)";
 4. Page 5, Line 24: "a foreign pipeline (Enterprise Products Operating, LLC)";
 - ii. Page 6
 1. Line 11: "crossing foreign pipeline (Alliance Pipeline);
 2. Line 27: "a foreign pipeline (Magellan Pipeline Company)".
 3. Line 38: "foreign pipelines (One OK and Northern Border Pipeline);

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- d. Please label the higher designation of Farm to Market Roads or state highways for the following instances and as appropriate:
 - i. Page 1
 - 1. Line 10: Skyline Road also has a higher County Highway designation of D41. Please label the higher designation of County Highway D41.
 - 2. Line 32: 300 Street also has a higher highway designation of Iowa Highway 246. Please label Iowa Highway 246.
 - ii. Page 2
 - 1. Line 16: Bellevue-Cascade Rd also has a higher County Highway designation of D61. Please label the higher designation of County Highway D61.
 - 2. Line 33: 150th St also has a higher County Highway designation of E17. Please label the higher designation of County Highway E17.
 - iii. Page 3, Line 5: Rockdale Road also has a higher County Highway designation of Y31. Please label the higher designation of County Highway Y31.
 - iv. Page 4
 - 1. Line 16: 140th Street also has a higher County Highway designation of E55. Please label the higher designation of County Highway E55.
 - 2. Line 34: 190th Street also has a higher County Highway designation of E63. Please label the higher designation of County Highway E63.
 - v. Page 5, Line 5: 290th Street also has a higher County Highway designation of Y70. Please label the higher designation of County Highway Y70.
 - vi. Page 6
 - 1. Line 12: 300th Street also has a higher County Highway designation of F33. Please label the higher designation of County Highway F33.
 - 2. Line 35: 240th Street also has a higher County Highway designation of F45. Please label the higher designation of County Highway F45.
 - 3. Line 44: 210st Street also has a higher County Highway designation of F55. Please label the higher designation of County Highway F55.
- e. Please change from “railroad” to “railroad right-of-way for (Union Pacific Railroad)”;
- f. Page 1, Line 10: MidAmerican has described “...crossing a public road (Skyline Road) on private right-of-way crossing a waterway...” In order to remove uncertainty, please consider rewriting the statement with words that effect, “...crossing a public right-of-way (Skyline Road), thence continuing on private-right-of-way crossing a waterway (Lytle Creek)...”
- g. Page 1, Lines 12 through 14: MidAmerican has described the pipeline “...crossing two waterways (unnamed) in the Southwest Quarter of Section 3 and the Northwest Quarter of Section 10...”, however Petition Exhibit C-4, Page 2, Rivers, Streams, Bodies of Water, Lines 3 and 4 describe both crossings within

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Section 3. If appropriate, please revise Lines 13 and 14 to indicate that both waterway crossings are within Section 3.

- h. Page 1, Lines 17 through 18: MidAmerican has described the pipeline "...crossing a waterway (unnamed) and another a waterway (Buncombe Creek) in the Southwest Quarter of Section 11, the Northwest Quarter and Southwest Quarter of Section 14, T87N, R2E...", however Petition Exhibit C-4, Page 2, Rivers, Streams, Bodies of Water, Lines 3 and 4 describes both crossings within the Southwest Quarter of Section 3, Township 87 North. If appropriate, please revise Line 18 to indicate that both waterway crossings are within the Southwest Quarter of Section 11 then continuing with words that effect, "...crossing a waterway (unnamed) and another a waterway (Buncombe Creek) in the Southwest Quarter of Section 11, the Northwest Quarter and Southwest Quarter of Section 14, T87N, R2E; thence continuing in a southeasterly direction in the Northwest Quarter of Section 14, T87N, R2E;..."
- i. Page 1, Lines 22 through 23: MidAmerican has described the pipeline "crossing [a public right of way] (Haxbylane Road) in the Northeast Quarter and the Southeast Quarter of Section 23, T87N, R2E...", however Petition Exhibit B, Page 5 describes the public right of way for Haxbylane road traversing between Southeast Quarter of Section 14 and the Northeast Quarter of Section 23 of Township 87 North, Range 2 East. Please correct Lines 22 and 23 describing "...the Northeast Quarter of Section 23 and the Northeast Quarter of Section 23, T87N, R2E..."
- j. Page 1, Lines 22 through 24: MidAmerican has described the pipeline crossing a [public right of way] for (Haxbylane Road) and then continuing in a southerly direction crossing a [public right of way] (Decker Lane), however Petition Exhibit C-4, Page 2, Rivers, Streams, Bodies of Water, Line 8 describes the pipeline crossing an Unnamed Waterway within the Northeast Quarter of Section 23, Township 87 North, Range 2 East. Please, within Exhibit A near lines 23 through 24 indicate crossing the "unnamed waterway within the Northeast Quarter of Section 23, Township 87 North, Range 2 East" before the pipeline continues "in a southerly direction".
- k. Page 1, Line 34: MidAmerican has described the pipeline crossing the Dubuque-Jackson county line, however Petition Exhibit B, page 7, in the Southeast Quarter of Section 36, Township 87 North, Range 2 East depicts the pipeline entering a public right of way for [Iowa Highway 246]. Please, within Exhibit A near Line 34 describe words to effect, the pipeline "...crossing a public right of way (Iowa Highway 246..."
- l. On several occasions, MidAmerican has listed Range 2 East rather than Range 3 East as depicted within Petition Exhibit B, Pages 7 and 8. If appropriate, please change the Range from "R2E" to "R3E" for the following listings on Page 2:
 - i. Line 3;
 - ii. Line 7;
 - iii. Line 12;
 - iv. Line 15;
 - v. Line 18; and
 - vi. Line 20.
- m. Page 3, Line 19: Describes the pipeline traveling through the Southwest Quarter of Section 27, Township 84 North, Range 3 East, however Petition Exhibit B, Page 17, in said section, township and range depicts the pipeline traversing the public right of way for 17 Street. Please, within Exhibit A near Line 19 describe words to effect the pipeline "...crossing a public right of way (17 St)..."

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- n. Page 4, Line 4: Describes the pipeline traveling through the Southeast Quarter of Section 3, Township 83 North, Range 3 East, however Petition Exhibit B, Page 18, in said section, township and range depicts the pipeline traversing the public right of way for 110 Street. Please, within Exhibit A near Line 4 describe words to effect the pipeline "...crossing a public right of way (110 St)..."
 - o. Page 6, Lines 7 through 8: Describes the pipeline crossing an unnamed waterway in the Southwest Quarter of Section 5, Township 80 North, Range 4 East, and continuing until the next feature, 310th Street, however Petition Exhibit C-4, Page 2, Rivers, Streams, Bodies of Water, Line 8 describes the pipeline crossing McDonald Creek in the Southeast Quarter of Section 5, Township 80 North, Range 4 East. Please, within Exhibit A near Line 7 describe words to effect the pipeline "...crossing a waterway (McDonald Creek)."
 - p. Page 5, Line 25: Describes the pipeline after crossing two foreign [private rights of way] for ONEOK and Northern Border Pipeline; the pipeline continues in a southwesterly direction, however Petition Exhibit B, Page 40, within the Southeast Quarter of Section 18, Township 79 North, Range 4 East depicts the pipeline entering and exiting a town border station in the easterly and westerly directions. Also see, 7.a. Please, within Petition Exhibit A near Line 25 describe the pipeline as it changes direction to and from said Town border station at said location.
2. Exhibit B
- a. Please label any buildings or places within the potential impact radius of the transmission pipeline as defined in 49 CFR 192.903. Labeling these locations within the potential impact radius of the transmission line is in accordance with 199 Iowa Administrative Code 10.3(1)b(6).
 - b. Please label the Class Locations along the pipeline.
 - c. Within the Southeast Quarter of Section 14, Township 87 North, Range 2 East, is the intersection of this pipeline (Dubuque Davenport Lateral) and a pipeline owned by Enterprise Products Operating, llc, (Enterprise) however within the Dubuque county map published by the Iowa Department of Transportation and the Pipeline and Hazardous Safety Administration's (PHMSA's) National Pipeline Mapping System (NPMS) map instead depicts the intersection of said two pipelines in the Southwest Quarter of Section 14, Township 87 North, Range 2 East. Please validate the location and if appropriate correct the placement of the Enterprise pipeline.
 - d. On page 7, within: 1) the Northwest quarter of Section 36, Township 87 North, Range 2 East, 2) the Southeast Quarter of Section 36, Township 87 North, Range 2 East, and 3) the Northeast Quarter of Section 1, Township 86 North, Range 2 East, MidAmerican identifies three crossing between this docketed pipeline and a Northern Natural Gas Company (NNG) pipeline, however PHMSA's National Pipeline Mapping System map and the Jackson county map published by the Iowa Department of Transportation (DOT) otherwise depict this docketed pipeline crossing said NNG pipeline only once. Please validate the location of the three said intersections of the said two pipelines and if appropriate correct the placement of the NNG pipeline.
 - e. Within page 7, in the Northwest quarter of Section 1, Township 86 North, Range 2 East, is labeled 193 Ave. Please increase the readability of 193rd Avenue.
 - f. Within page 7, in the Northeast quarter of Section 2, Township 86 North, Range 2 East MidAmerican has depicted the county line. However, the visibility of the county line ceases to be recognizable for Section 1, Township 86 North, Range 2

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East and for the Northwest quarter of Section 6, Township 86 North, Range 3 West.

- g. Please label the higher designation of Farm to Market Roads or state highways for the following instances and as appropriate:
- i. Page 3, in the Northeast quarter of Section 3, Township 87 North, Range 2 East MidAmerican has labeled Skyline Road, which also has a higher County Highway designation of D41. Please label the higher designation of County Highway D41.
 - ii. Page 7, in the Southwest quarter of Section 36, Township 87 North, Range 2 East is the label of 300 Street, which is a county highway designation. That county highway is also Iowa Highway 246, which has a higher priority over a county designation. Please label Iowa Highway 246.
 - iii. Page 9, in the Southwest quarter of Section 20, Township 86 North, Range 3 East, MidAmerican has labeled Bellevue-Cascade Rd, which also has a higher County Highway designation of D61. Please label the higher designation of County Highway D61.
 - iv. Page 12, in the Southeast quarter of Section 18, Township 85 North, Range 3 East, MidAmerican has labeled 150th St, which also has a higher County Highway designation of E17. Please label the higher designation of County Highway E17.
 - v. Page 14, in the Southeast quarter of Section 5, Township 84 North, Range 3 East, MidAmerican has labeled Rockdale Road, which also has a higher County Highway designation of Y31. Please label the higher designation of County Highway Y31.
 - vi. Pages 17 and 18, in the Southwest quarter of Section 34, Township 84 North, Range 3 East, MidAmerican has labeled 254th Avenue, which also has a higher County Highway designation of Y60. Please label the higher designation of County Highway Y60.
 - vii. Pages 17 and 18, in the Southwest quarter of Section 34, Township 84 North, Range 3 East, MidAmerican has labeled 252nd Avenue, which also has a higher County Highway designation of Y60. Please label the higher designation of County Highway Y60.
 - viii. Pages 19 and 20, in the Southeast quarter of Sections 22 and 23, Township 84 North, Range 3 East, MidAmerican has labeled 140th Street, which also has a higher County Highway designation of E55. Please label the higher designation of County Highway E55.
 - ix. Pages 22 and 23, in the Northwest quarter of Section 19, Township 82 North, Range 4 East, MidAmerican has labeled 190th Street, which also has a higher County Highway designation of E63. Please label the higher designation of County Highway E63.
 - x. Pages 23, 24 and 25, in the Northwest quarter of Section 20, Township 82 North, Range 4 East; in the Northeast quarter of Section 7, Township 81 North, Range 4 West; and in the Northwest quarter of Section 8, Township 81 North, Range 4 West MidAmerican has labeled 290th Street, which also has a higher County Highway designation of Y70. Please label the higher designation of County Highway Y70.
 - xi. Pages 23 and 24, in the Southwest quarter of Section 32, Township 82 North, Range 4 and the Northwest quarter of Section 32, Township 82 North, Range 4 East MidAmerican has labeled 215th Street, which also

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- has a higher County Highway designation of F12. Please label the higher designation of County Highway F12.
- xii. Pages 28 and 29, in the Northeast quarter of Section 31, Township 81 North, Range 4 East MidAmerican has labeled 285th Street, which also has a higher County Highway designation of Y68. Please label the higher designation of County Highway Y68.
 - xiii. Page 32, in the Southwest quarter of Section 9, Township 80 North, Range 4 East MidAmerican has labeled 300th Street, which also has a higher County Highway designation of F33. Please label the higher designation of County Highway F33.
 - xiv. Pages 38 and 39, in the Southwest quarter of Section 8, Township 79 North, Range 4 East MidAmerican has labeled 240th Street, which also has a higher County Highway designation of F45. Please label the higher designation of County Highway F45.
 - xv. Page 42, in the Northwest quarter of Section 31, Township 79 North, Range 4 East MidAmerican has labeled 210st Street, which also has a higher County Highway designation of F55. Please label the higher designation of County Highway F55.
- h. Within pages 14 and 15, in the Southeast quarter of Section 4, Township 84 North, Range 3 East is a foreign pipeline labeled Kinder Morgan Cochin LLC, however NPMS and Iowa DOT label this pipeline as owned by Northern Natural Gas Company (NNG). If appropriate, please:
 - i. Change the label to NNG.
 - ii. Change the symbology to MidAmerican's symbology for an NNG pipeline.
 - i. Within page 21 in the Northeast Quarter of Section 12, Township 82 North, Range 3 East MidAmerican has labeled Williams Creek, however the the Clinton county map published by the Iowa DOT otherwise labels that as Deep Creek.
 - j. Within page 2, Legend, lists three installation dates for "6/27/1996", however Exhibit C-1 lists the pipe specifications for the first twelve specifications list the installation date as "6/27/1996". Please revise the Install Date as appropriate.
 - k. The following legend entries do not appear to correlate to specifications listed in Petition Exhibit C-2 for pages 1 through six. Please revise or explain:
 - i. The first legend entry, "3/13/1996 / 16" / 0.219".
 - ii. The second legend entry, "3/13/1996 / 16" / 0.281".
 - iii. The third legend entry, "3/17/1996 / 16" / 0.219"
 - iv. The fourth legend entry, "3/17/1996 / 16" / 0.281"
 - v. The fifth legend entry, "3/17/1996 / 16" / 0.375"
 - vi. The sixth legend entry, "6/19/1996 / 16" / 0.219"
 - vii. The seventh legend entry, "6/19/1996 / 16" / 0.281"
 - viii. The eighth legend entry, "6/20/1996 / 16" / 0.219"
 - ix. The fourteenth legend entry, "3/30/2006 / 16" / 0.375"
3. Exhibit C, Line 11, Federal or State Highways
- a. Please see paragraph 5.a.i. regarding 245 Street. Revise to six crossings, if appropriate.
4. Exhibit C-1
- a. Please number the Install Dates so as to provide clarity between the seventeen install dates.
 - b. The following Pipe Specification Install Dates to not appear to match their correlating Install Dates within Petition Exhibit B, Page 2, found within the legend.

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Within Petition Exhibit C-1 are thirteen "Install Date[s]" of 6/27/1996, however within Petition Exhibit B, Page 2, the Legend there are:

- i. Page 2, the third C-1 "Install Date": Install Date, 6/27/1996; External Diameter, 16-inch; and Wall thickness, 0.219-inch does not appear to correlate with any legend entries found on Petition Exhibit B, Page 2. Please revise or explain.

5. Exhibit C-2

- a. Regulator Station QCIA270(277976), Inlet Pressure: Please see 7.a. and revise if appropriate.

6. Exhibit C-4

a. Page 1

i. Federal or State Highways

1. Line 5: MidAmerican has identified 245 Street (Old Highway 30) as a federal or state highway, however 245 Street has no higher designation as a federal or state highway. If appropriate, please remove the entry for Line 5, 245 Street.

ii. Foreign Pipelines

1. Line 1: Please see paragraph 2.c. regarding Enterprise Products Operating, LLC.
2. Line 7: Please see paragraph 2.h. regarding Kinder Morgan Cochin, LLC.

b. Page 2, Rivers, Streams, Bodies of Water:

- i. Line 5: Describes the pipeline crossing an unnamed waterway in the southwest quarter of section 11, township 87 north, range 30 west; however Petition Exhibit B, Page 5, depicts the pipeline crossing said unnamed waterway in the southwest quarter of section 11, township 87 north, range 2 west. Please correct line 5, if appropriate.
- ii. Line 6: Describes the pipeline crossing Buncombe Creek in the southwest quarter of section 11, township 87 north, range 30 west; however Petition Exhibit B, Page 5, depicts the pipeline crossing said Buncombe Creek in the southwest quarter of section 11, township 87 north, range 2 west. Please correct line 6, if appropriate.
- iii. Line 26: Describes the pipeline crossing Cedar Creek in the northeast quarter of section 19, township 85 north, range 3 east; however Petition Exhibit B, Page 13, depicts the pipeline crossing said Cedar Creek in the northeast quarter of section 29, township 85 north, range 3 east. Please correct line 26, if appropriate.

7. Exhibit F

- a. Page 1, Item 1, Paragraph 2: Describes the pipeline receiving natural gas at its connection with Northern Natural Gas located in the Northwest Quarter of Section 28, Township 88 North, Range 3 East providing an outlet pressure of 960-psig. Further, Petition Exhibit C-2, page 1, Regulator Stations, QCIA222 (735262) and 0222 describe the inlet and outlet pressures of 960-psig. However, Regulator Stations: QCIA270 (277976) and 0270 show respective inlet pressures of 1050-psig and 960-psig. Does the pipeline accept natural gas from either pipeline owned by OneOK or Northern Border? Please describe within the appropriate petition exhibits the reason for this increase in inlet pressure.

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- b. Page 1, Section 2, Paragraph 2: Describes the pipeline traversing private and public right-of-way.
 - i. Please also include railroad right of way.
 - ii. Please also correct the spelling of “right of way” to “rights-of-way”.

Please respond within 30 days of the date of this letter with the information required, or advise staff when the filings can be anticipated. Please file any additional questions you may have regarding the IUB staff review letter in the IUB’s electronic filing system under this docket number.

Thank you,

/s/ Keith Wieland

Keith Wieland
Utilities Regulation Engineer
Safety and Engineering Section