

2-10) Refer to Page 9 of the Application. The Applicant states the "ultimate spacing and location of the MLVs is dependent on final routing and will be determined after completion of necessary surveys and landowner negotiations."

- a) Explain why the existing routing cannot be used to determine MLV locations when the Applicant states any additional routing modifications will be minor in nature.
- b) Explain which surveys are necessary and haven't been completed to determine where MLVs should be located.
- c) Explain how landowner negotiations will factor into the MLV location placement.

RESPONSE:

- a) The Applications includes this statement: "Ultimate spacing and locations of the MLVs is dependent on final routing ...". This statement is not meant to convey that the existing route is not being used to determine baseline MLV locations. There is a potential for final locations to shift based on landowner negotiations and additional locations may be added based on additional analyses discussed in DR2-4(a). Baseline MLV maps are provided with this response.
- b) The Applicant needs to complete biological, cultural, and threatened and endangered species surveys to determine additional environmentally sensitive locations that could be a factor in additional placement of mainline valves.
- c) The Applicant will work with landowners to place valves at appropriate locations. If a landowner has concerns regarding the proposed MLV placement on their property, the Applicant will work with such landowner and with adjacent landowners in an attempt to find the appropriate location.

SUPPLEMENTAL RESPONSE:

- a) An updated map showing mainline valves is attached and produced subject to the protective order entered March 2, 2023.

Dated this 27th day of June, 2023.

WOODS, FULLER, SHULTZ & SMITH P.C.

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OBJECTIONS

The objections stated to Staff's Second Set of Data Requests were made by James E. Moore, one of the attorneys for Navigator Heartland Greenway, for the reasons and upon the grounds stated therein.

/s/ James E. Moore
*One of the Attorneys for Navigator Heartland
Greenway*

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of June, 2023, a true and correct copy of the foregoing Applicant's Second Supplemental Responses to Staff's Second Set of Data Requests was served via e-mail transmission to the following:

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