



March 4, 2021

Ms. Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Re: Midship Pipeline Company, LLC
Docket No. CP17-458-000
OEP/DG2E/Gas 1
Update to the Record Regarding CLC-Represented Landowner Communications

Dear Ms. Bose:

This filing updates the record in the above-captioned proceeding regarding ongoing discussions between Midship Pipeline Company, LLC (“Midship”) and certain landowners represented by Central Land Consulting, Inc. (“CLC”).

At Midship’s request – a request made through CLC and counsel – Midship representatives participated in two days of in-person, all-day meetings in Oklahoma on March 1 and March 2, 2021, with additional meetings and site visits to certain tracts on March 3, 2021. These meetings were attended by CLC and representatives from the following affected properties: Hardesty (GR-0147), Hardesty (GR-0127), Burchfield (GR-0133, -0134, -0135), McComas (GR-0129, -0130, -0131, -0132, -0137, -0138), Stover (CN-0060, -0062), Luber (CL-KI-0065, -0067), McElvaney (GR-0310), and Morris (GR-0353). Out of respect for settlement privilege and landowner privacy, Midship will not disclose the details of those meetings or attendee names in this filing. Rather, Midship submits this filing solely for purposes of making the Commission aware of the continued flow of information between Midship and affected landowners, even where discussions have not yet resulted in resolution of outstanding matters.

Midship takes seriously its role in reaching timely resolution on restoration concerns with CLC-represented landowners, is engaged toward that end, and will remain engaged. Midship is working actively with the landowners and FERC toward resolving remaining restoration items along its right of way. For example, during discussion with one landowner, Midship was able to deploy crews to begin to address an ongoing restoration issue. Crews worked to address as much as possible before the winter storm rolled through, and returned to the project as soon as site conditions allowed. This work is now nearly completed.

Midship is committed to holding additional meetings with landowners to continue to identify issues and is preparing to return to the project to address any remaining restoration matters as soon as weather permits. Midship believes the landowners would like to see even more progress, and so would Midship, but the CLC representation is thwarting that progress. Within less than an hour of concluding the second full day of discussions with landowners, CLC began a barrage of public filings to this Commission and calls to other federal officials and agencies stating claims Midship cannot ignore or allow to go unanswered.

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Midship currently has crews addressing restoration matters along the pipeline, however, Midship continues to be affected by inclement weather which slows progress towards restoration as grading and soil decompaction cannot be conducted on saturated soils. Weather and site conditions aside, forward progress toward resolution continues to be thwarted at every turn by CLC's tactics with statements to certain landowners virtually ensuring no progress will be made. Midship attended these meetings in good faith to hear the landowners out regarding their issues, however, rather than making progress, were subjected to threats of violence by certain landowners. This situation is not helping the environment or these landowners, and has the potential to be dangerous to our personnel and contractors.

CLC's tactics are not unknown to the Commission. CLC – a consulting firm out of Ohio – has strategically inflated damages claims wielded at other Commission-jurisdictional pipeline projects, and it will continue to do so. This perversion of the FERC process, tantamount to extortion, should not be condoned by this Commission or by any other federal or state agency, or Oklahomans for that matter. Midship is in weekly if not daily communication on these matters – either directly with CLC, its counsel, or through responses to the numerous CLC initiated calls to FERC's landowner helpline. These helpline calls appear to be happening while we are literally in the room (or just were) with CLC attempting to reach resolution.

Advancement toward resolution requires a cooperative relationship with the landowners and FERC, one that Midship is committed to fostering. Midship will continue to work expeditiously to carry out its obligations to the landowners and under the FERC Plan and Procedures, taking into account the limitations of current winter weather conditions on the Project – and even where CLC seeks to hinder meaningful progress through misinformation and tactics designed to cast Midship in a poor light.

Midship also continues to respond to matters raised through the FERC Landowner Helpline. However, Midship encourages landowners to reach out to Midship directly via Midship's Landowner Hotline: 800-305-2466 if they are interested in resolution rather than a continuation of CLC's delay tactics.

Should you have any questions about the instant filing, please feel free to contact the undersigned at (713) 375-5000.

Respectfully submitted,

/s/ Karri Mahmoud

Karri Mahmoud
Director, Environmental and Regulatory Projects
Midship Pipeline Company, LLC

Certificate of Service

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated at Houston, Texas this 4th day of March, 2021.

/s/ Karri Mahmoud

Karri Mahmoud
Midship Pipeline Company, LLC