

## **EXHIBIT 4**

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Attorneys for Defendant

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IN THE THIRD JUDICIAL DISTRICT COURT IN AND FOR

SALT LAKE COUNTY, STATE OF UTAH

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METROPOLITAN WATER DISTRICT OF  
SALT LAKE & SANDY, a political  
subdivision of the State of Utah,

Plaintiff,

v.

QUESTAR GAS COMPANY, a Utah  
corporation,

Defendant.

**DECLARATION OF RHONDA FORDE**

Civil No. 120905379

Judge Faust

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I, Rhonda Forde, declare that I am over the age of 21 and am qualified to offer this  
declaration:

1. I have personal knowledge of the facts stated below.

2. I am currently employed as an engineer for Questar Gas Company's Operations Engineering department. In this role I oversee and coordinate planning, engineering, and construction of the intermediate high-pressure ("IHP") natural gas systems in Salt Lake County, South Davis County, and Tooele County. I have been employed in this position since April 2007.

3. I have reviewed the IHP natural gas pipeline system maps for the area underneath and near Westview Drive relevant to this lawsuit.

4. Upon reviewing Questar Gas's records, I have found no indication that Questar Gas has ever conflicted with Metropolitan Water District of Salt Lake & Sandy's ("Metro Water") aqueduct underneath Westview Drive. Questar Gas's system has never been rerouted or moved in this area.

5. The IHP system crosses Metro Water's aqueduct in five locations in and near Westview Drive. To ensure continued adequate natural gas service to the Olympus Cove area east of Westview Drive, on a year around basis the IHP system requires multiple permanent crossings of Metro Water's aqueduct.

6. Upon notice from Metro Water, Questar Gas could temporarily shut down or reroute any of the pipelines crossing Metro Water in order to accommodate construction by Metro Water without disrupting service to any homes in the area.

7. During summer months, Questar Gas could temporarily shut down or reroute all of the five crossing locations without disrupting service. In winter months a shut down of the pipelines may have to occur individually.

8. Questar Gas often uses natural gas trailers to temporarily (usually only one day at a time) supply natural gas with a one-way natural gas feed in which a shut down must occur to accommodate construction near Questar Gas' pipelines.

9. Questar Gas routinely works with and accommodates construction projects near our pipelines by taking a line out of service or making other temporary arrangements while excavation or other work occurs.

10. I created the map attached hereto as Exhibit "A" and incorporated by this reference, by using Questar Gas Company's mapping system. The first page of Exhibit A shows Questar Gas Company's natural gas system in and near Newcastle Drive in Sandy, Utah between Highland Drive and approximately 2800 East. The second page of Exhibit A shows Questar Gas Company's natural gas system in and near Highland Drive from Newcastle Drive to approximately 9800 South in Sandy, Utah.

11. Exhibit A shows at least 28 pipelines crossing the entire width of Newcastle Drive. The pipelines crossing Newcastle Drive range in size from ¾ inch service lines up to 4" IHP lines.

12. Exhibit A also shows several pipelines crossing the entire width of Highland Drive.

13. Based on my review of Exhibit A, construction or repair of a large water pipeline running down the middle of Newcastle Drive would likely require action by Questar Gas Company to ensure natural gas lines were temporarily rerouted, temporarily shutdown, or protected during any construction.

14. The actions required during construction in Newcastle Drive would likely be similar to those required during construction, replacement, or repair of the Salt Lake Aqueduct in Westview Drive.

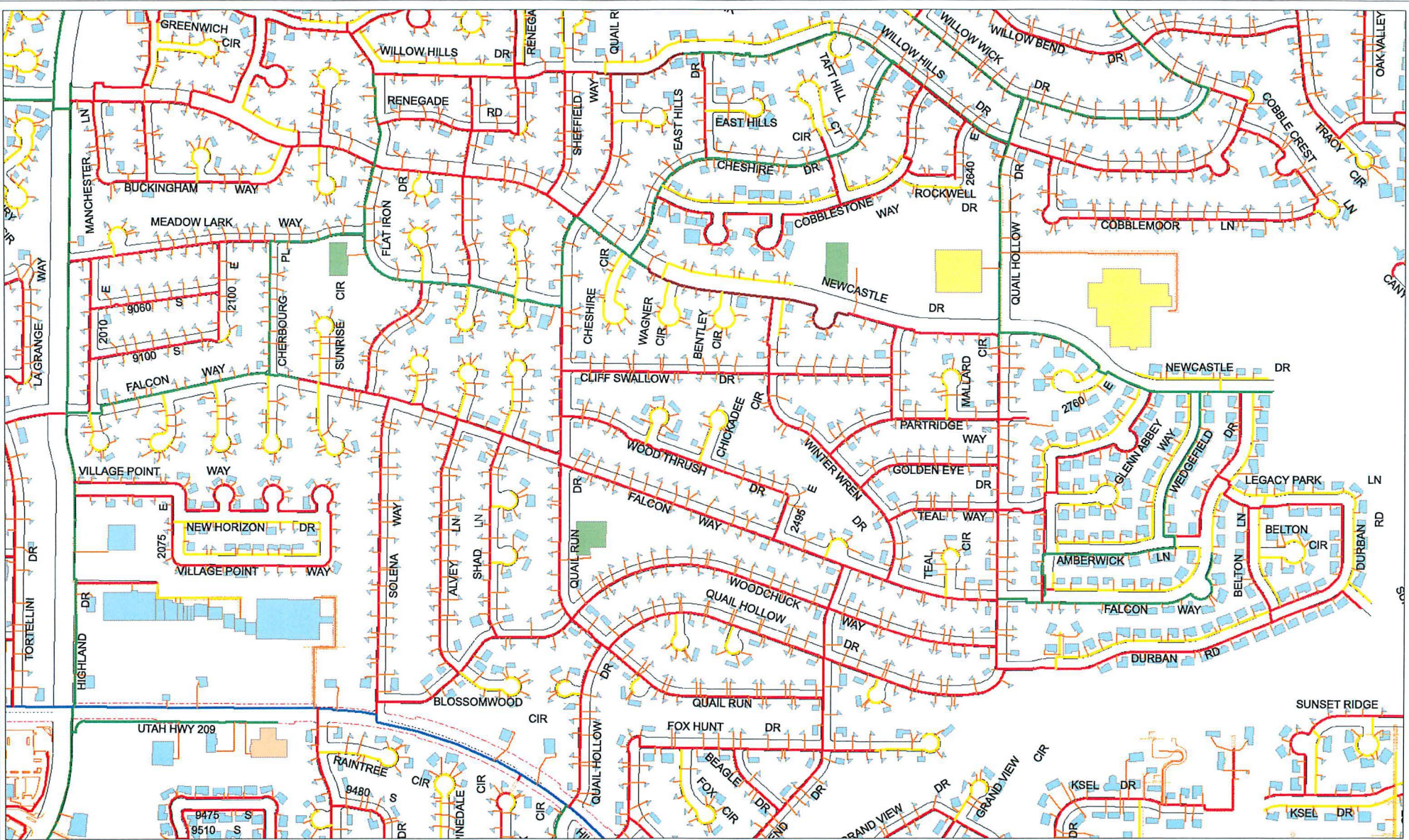
I declare under criminal penalty of the State of Utah, that the foregoing Declaration is true and correct.

Executed this 22 day of January 2013.

  
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Rhonda Forde

EXHIBIT “A”

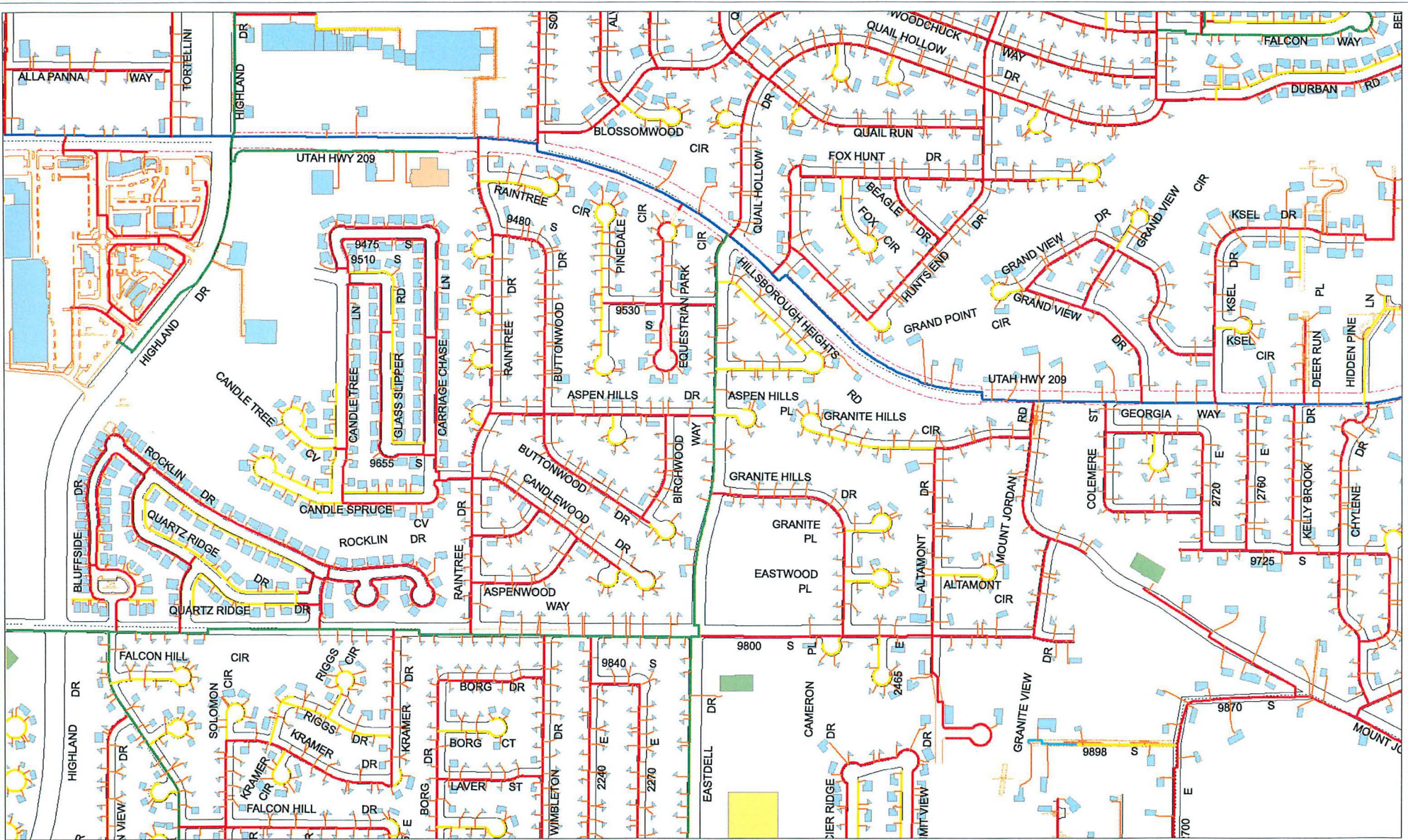




For planning purposes only.  
All locations approximate.  
Call 811 before digging.

QUESTAR MAPPING # 801-324-3970  
DATE: 1/21/2013 SHEET: \_\_\_\_\_





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DATE: 1/21/2013 SHEET: \_\_\_\_\_