

The estimated likelihood of a spill for the 91 miles of pipeline adjacent to Lake Ashtabula is 0.023 annually (once in 43 years). The estimated probability varies by a factor of 2.6. Assuming 50 years of operation 1.2 spills are may occur.

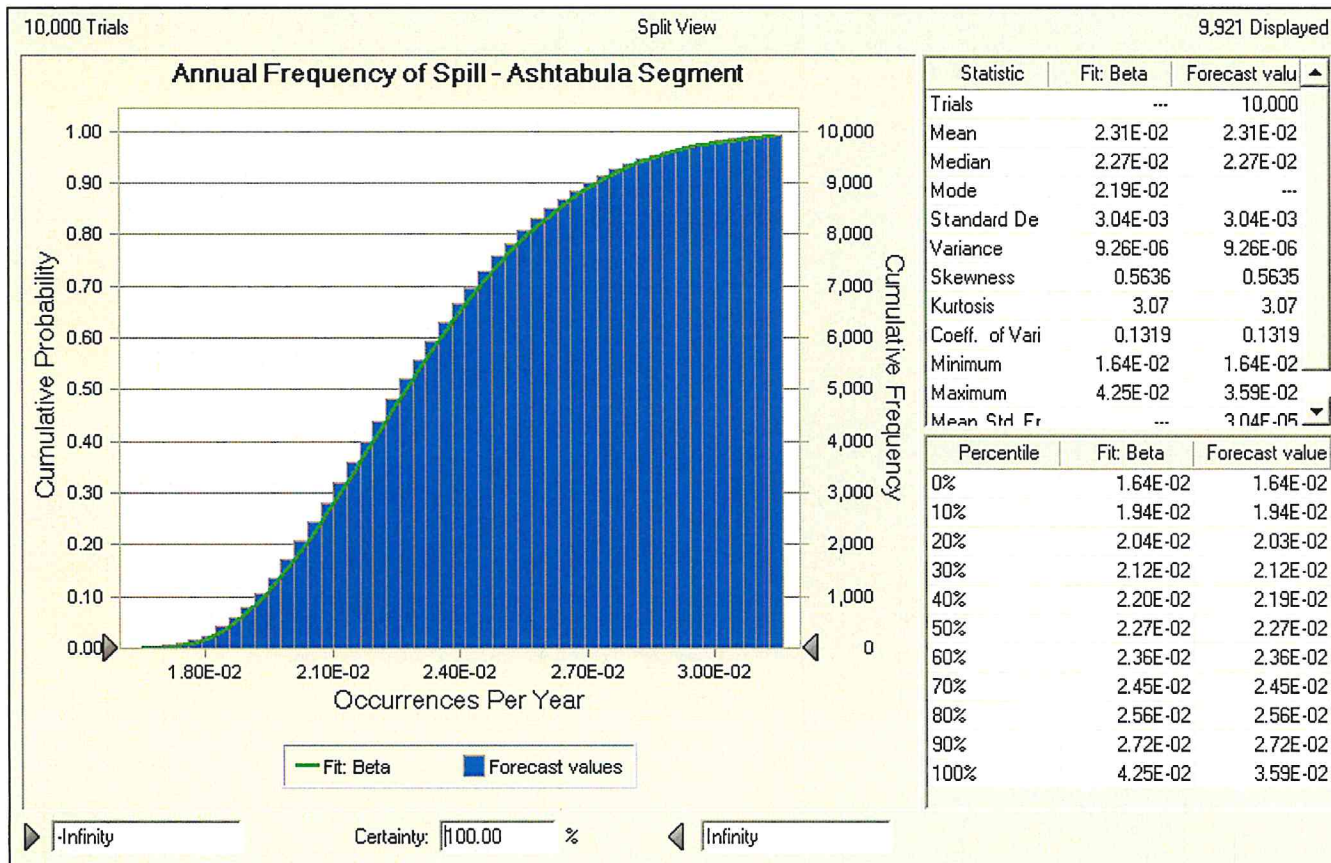


EXHIBIT
 FGO 12-3