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December 7, 2007

MS ILLONA A JEFFCOAT-SACCO  
EXECUTIVE SECRETARY  
PUBLIC SERVICE COMMISSION  
600 EAST BOULEVARD, DEPT 408  
BISMARCK ND 58505-0480

US MAIL & ELECTRONIC MAIL  
[ijs@nd.gov](mailto:ijs@nd.gov)

Re: TransCanada - Keystone Pipeline Project  
Case No: PU-06-421  
OAH File No. 20070181  
Our File No. 11815

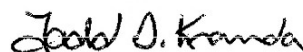
Dear Ms. Jeffcoat-Sacco:

Enclosed for filing in the above-entitled matter are 7 (seven) copies and 1 (one) original of the follow late-filed exhibit:

Exhibit T-46: Report on Quantification of High Consequence Areas regarding Keystone Pipeline.

This has being filed electronically and has been served electronically on the parties as shown below and on the attached Certificate of Service. Thank you for your attention to this matter. Please feel free to contact me should you have any questions.

Sincerely,



Todd D. Kranda

TDK;dr

Enc

c: TransCanada Keystone  
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**North Dakota Public Service Commission**  
**TransCanada Keystone Pipeline, LP**  
**Case No. PU-06-421**  
**Late Filed Exhibits**

**December 7, 2007**  
**Page 1 of 2**

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**Late Filed Exhibit T-46**

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**Data Request:**

Report on Quantification of High Consequence Areas regarding Keystone Pipeline.

**Response:**

The High Consequence Areas (HCA's) are shown within the Appendix material of the TransCanada Keystone Pipeline Application previously filed with the North Dakota Public Service Commission for this case. The CD that Keystone filed contained all Department of State filings and there are updates along the way of the HCA mileage, the first being the July 2006 risk assessment and the last being March 2007. The HCA data is also located in the Emergency Response Plan (based on the July filing information).

The most current mileage of HCA's in North Dakota can be found in Appendix A\5 March 2007 Filing\Risk Assessment Folder. The file name is 3 risk assessment 03-30-07. The Table is 4-19 Mileage Summary of USDOT-Defined HCAs Identified Along the Keystone Pipeline Project, Based on Centerline Filed December 2006 on page 4-27. As shown in the Table, which is reproduced below and found in the Appendix, North Dakota has 2.1 miles of Drinking Water HCA and 2.0 miles of Ecologically sensitive area for a total of 4.1 miles of HCA.

## Late Filed Exhibit T-46

**Table 4-19 Mileage Summary of USDOT-Defined HCAs Identified Along the Keystone Pipeline Project, Based on Centerline Filed December 2006**

	Miles of Pipeline				Projected Number of Spills in 10 years (occurrence interval)			
	Populated Areas	Drinking Water	Ecologically Sensitive Area	Total in HCAs <sup>1</sup>	Populated Areas	Drinking Water	Ecologically Sensitive Area	Total HCAs <sup>1</sup>
North Dakota	0.0	2.1	2.0	4.1	NA	0.002 (4,300 yrs)	0.002 (4,550 yrs)	0.005
South Dakota	1.0	9.2	22.4	29.2	0.001 (9,100 yrs)	0.010 (990 yrs)	0.026 (405 yrs)	0.03
Nebraska	0.0	0.0	10.5	6.5	NA	NA	0.011 (865 yrs)	0.007
Kansas	0.0	8.9	18.6	27.5	NA	0.010 (1,020 yrs)	0.020 (490 yrs)	0.03
Missouri	2.1	3.8	59.4	69.5	0.002 (4,300 yrs)	0.004 (2,300 yrs)	0.065 (155 yrs)	0.08
Illinois	4.7	12.0	7.5	21.9	0.005 (1,900 yrs)	0.013 (760 yrs)	0.008 (1,200 yrs)	0.02
Keystone Mainline subtotal	7.8	36.1	120.4	158.8	0.008 (1,200 yrs)	0.040 (250 yrs)	0.13 (75 yrs)	0.17
Nebraska	0.0	0.0	0.0	0.0	NA	0.0	0.0	0.00
Kansas	0.0	35.9	47.8	67.0	NA	0.039 (250 yrs)	0.053 (190 yrs)	0.07
Oklahoma	0.8	11.4	7.5	16.1	0.001 (11,400 yrs)	0.012 (800 yrs)	0.008 (1,200 yrs)	0.02
Cushing Extension Subtotal	0.8	47.8	55.3	83.1	0.001 (11,400 yrs)	0.053 (190 yrs)	0.061 (165 yrs)	0.09
<b>Project Total</b>	<b>8.6</b>	<b>83.5</b>	<b>175.7</b>	<b>241.9</b>	<b>0.009</b> (1,100 yrs)	<b>0.092</b> (110 yrs)	<b>0.19</b> (52 yrs)	<b>0.27</b> (37 yrs)

<sup>1</sup>Numbers are not additive because some miles overlap in the different types of HCAs.

Note: NA indicates no USDOT-defined populated area within the segment.

Projected number of spills in 10 years and occurrence interval were conservatively estimated based on the maximum probability of spills (1.5 spills in 10 years during operation at 591,000 bpd and transporting diluted bitumen). This estimates the maximum possible risk, and assumes risk is evenly disturbed along the entire proposed pipeline and Cushing Extension.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF NORTH DAKOTA

TRANSCANADA KEYSTONE PIPELINE, LP     )  
30-INCH CRUDE OIL PIPELINE/CAVALIER TO )     OAH FILE NO. 20070181  
SARGENT COUNTIES SITING APPLICATION )     CASE NO. PU-06-421

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the Late Filed Exhibit T-46:  
Report on Quantification of High Consequence Areas regarding Keystone Pipeline to which this  
Certificate of Service is attached was served on the 7th day of December, 2007 by email  
addressed to:

William W Binek  
Chief Counsel  
Public Service Commission  
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