

**PLAINS**  
PIPELINE, L.P.

September 23, 2015

Mr. Patrick Fahn  
Director, Compliance and Competitive Markets  
Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480



**Re: Response to Compliance Reporting Letter Dated August 28, 2015**  
**Case No. PU-10-630**

Dear Mr. Fahn,

Thank you for the attached compliance reporting letter dated August 28, 2015 with regard to Case No. PU-10-630 for our Bakken North Crude Oil Pipeline and a follow-up email to clarify your request dated September 21, 2015.

In response to your request, Plains is submitting a copy of the permit application and approval letter from the ND Department of Health to perform the pipeline hydrostatic testing. These documents should complete your records for permit completeness.

Plains is retaining various types of records, including those provided to us by Keitu Engineering, that document compliance with the Commission's order. These records will be preserved so if an inspection is requested by the ND Public Service commission they can be presented. It is Plains understanding from your e-mail that the ND Public Service Commission, after conversation with Keitu Engineering, believes that Plains had done adequate reclamation work and the initial results appeared to satisfy the Commission's order. Plains Pipeline will continue to monitor the right of way periodically to verify that revegetation remains established and noxious weeds are kept under control.

Please let me know if this response is sufficient to show compliance with the Commission's order.

If you have any questions or require additional information, please let me know. I can be reached at 701-575-2311 or at [djholli@paalp.com](mailto:djholli@paalp.com).

Sincerely,

Daniel J. Holli  
Environmental R/C Specialist

**153 PU-10-630** Filed: 9/24/2015 Pages: 9  
**Response to Aug. 28, 2015 letter regarding post construction inspection report**

Plains Pipeline, L.P.

Daniel Holli



# Public Service Commission

## State of North Dakota

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Randy Christmann  
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August 28, 2015

600 East Boulevard, Dept. 408  
Bismarck, North Dakota 58505-0480  
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Fax: 701-328-2410  
TDD: 800-366-6888 or 711

Plains Pipeline, L.P.  
Attn: Daniel Holli, Environmental Specialist  
P.O. Box 708  
Belfield, ND 58622

**RE: Case No. PU-10-630  
Compliance Reporting**

In this proceeding, the Company applied to construct 32.1 miles of crude oil pipeline from its existing Trenton Station to the state border in order to interconnect with the existing Wascana Pipeline in Montana. Construction was completed in March 2014. The third party inspector hired by the Commission completed a final inspection of the project and filed its report with the Commission in June 2015.

This reports notes that the Company needs to submit the following information to comply with the Commission's order in this case based on the information contained in the inspection:

- The discharge permit for hydrostatic testing. (Order Point No. 4)
- Documentation of re-vegetation surveys and noxious weed surveys. (Order Point 17)

The third party inspection report can be found at:

<http://www.psc.nd.gov/database/documents/10-0630/151-020.pdf>

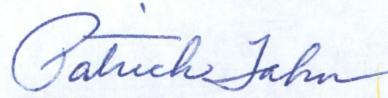
The Commission's order can be found at:

<http://www.psc.nd.gov/database/documents/10-0630/041-010.pdf>

Please forward your response to any information that is overdue within 30 days. For other information such as Tree and Shrub mitigation reports for future years, the Commission anticipates those responses will be filed in accordance with the Commission's requirements.

If you have any questions regarding this letter, please contact me at 701-328-4077.

Best regards,



Patrick Fahn  
Director, Compliance and Competitive Markets

**Daniel J Holli**

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**From:** Fahn, Patrick J. [pfahn@nd.gov]  
**Sent:** Monday, September 21, 2015 8:04 AM  
**To:** Daniel J Holli  
**Subject:** RE: Bakken North Question -- Case PU-10-630  
**Attachments:** Patrick Fahn.vcf

Dan,

Below are three order provisions that cover the requirement for reclamation of the pipeline corridor.

**8. Plains Pipeline agrees to maintain records that will demonstrate that it has complied with the requirements of the Commission's order issuing a Certificate of Corridor Compatibility or Route Permit, and that it will preserve these records for Commission inspection at any reasonable time upon reasonable notice.**

**17. Plains Pipeline understands and agrees that reclamation, fertilization, and reseeding is to be done according to the Natural Resources Conservation Service recommendations, unless otherwise specified by the landowner and approved by the Commission.**

**26. Plains Pipeline understands and agrees that it shall, as soon as practicable upon the completion of the construction of the transmission facility, restore the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.**

My visit with Keitu this morning confirmed that Plains had done adequate reclamation work and they felt the initial results appeared to satisfy the Commission order.

Plains was also required to maintain records that will demonstrate that it has complied with the requirements of the Commission's order, and that it will preserve these records for Commission inspection at any reasonable time upon reasonable notice. So, if you confirm that Plains has maintained records that will demonstrate that it has complied with the requirements of the Commission's order, we don't need a copy at the Commission. We agree with Keitu that such records would include, but not be limited to records of planting as well as re-vegetation surveys and noxious weed surveys over a period of three or more growing seasons, depending on the success of the re-vegetation.

In conclusion, Plains should confirm that it is maintaining records that will demonstrate that it has complied with the requirements of the Commission's order, including reclamation, fertilization, and reseeding to restore the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.

**Patrick Fahn**

Director  
Compliance and Competitive Markets

North Dakota Public Service Commission  
600 E Boulevard Ave, Dept. 408  
Bismarck ND 58505-0480  
(701) 328-4077 Work  
(701) 328-2410 Fax  
pfahn@nd.gov

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**From:** Daniel J Holli [<mailto:DJHolli@paalp.com>]  
**Sent:** Wednesday, September 09, 2015 11:46 AM  
**To:** Fahn, Patrick J.  
**Subject:** Bakken North Question -- Case PU-10-630

Pat,

I have received the attached data request from your department requesting information about revegetation surveys and noxious weed surveys on the Bakken north Pipeline, case No. PU-10-630.

I do not find a PSC requirement in the Certification Relating to Order PU-10-630 Provision #17 that specifies that a revegetation survey or noxious weed survey is required. In the KEITU engineers and Consultants report, the response to Condition 17 indicates these reports are required at the request of the PSC.

Can you help me understand where this request is made and what Plains will need to complete to satisfy this requirement?

Thank you,

Daniel Holli  
Plains Pipeline, L.P.  
Environmental R/C Specialist  
Belfield, ND  
Office: 701-575-2311  
Cell: 701-590-1253

Attention:

The information contained in this message and/or attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged material. If you received this in error, please contact the Plains Service Desk at 713-646-4444 and delete the material from any system and destroy any copies.

This footnote also confirms that this email message has been scanned for Viruses and Content and cleared.

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**NORTH DAKOTA**  
DEPARTMENT of HEALTH

ENVIRONMENTAL HEALTH SECTION  
Gold Seal Center, 918 E. Divide Ave.  
Bismarck, ND 58501-1947  
701.328.5200 (fax)  
www.ndhealth.gov



August 6, 2012

Mike Bondurant  
Plains All-American Pipeline, L.P.  
PO Box 683  
Sheridan, WY 82801

Re: NDPDES Permit No. NDG070341

We have received your "Application for Permit to Discharge - NDPDES Industrial-Short Form C" and have granted authority to discharge under the General Permit for Temporary Dewatering/Hydrostatic Testing Permit NDG070000. Your facility has been assigned permit no. **NDG070341**. This permit has been issued by the North Dakota Department of Health (NDDoH) with the understanding that all other applicable permits and permissions have been obtained for the start of the following project. The application indicates that the discharge(s) may consist of potable water for the new 12.75" pipeline test:

Discharge Point	Volume (Gallons)	Location	
001H	≈ 1,500,000	12.75" Pipeline	Lat 48.442507, Long -103.993819; Williams County

**All discharge points shall be inspected daily.** On a daily basis record the total volume of discharge and make a visual inspection for Oil and Grease. Analytical parameters for pH and Total Suspended Solids (TSS) shall be waived for this project. The parameter for Chlorine shall be tested only if the water source has been chlorinated. The parameter of Oil and/or Grease is waived unless sheen is observed in the discharge; if observed then collect a sample for Total Petroleum Hydrocarbon (TPH). The department shall be contacted on all findings of Oil and Grease. All discharges made directly to a surface water body or wetland shall be inspected closely so as to minimize any turbidity issues. Best Management Practices (BMPs) must be used to minimize the impact of the discharge.

**ADDITIVES:** No additives were reviewed for this project.

Enclosed are Discharge Monitoring Report (DMR) forms for your use. If someone else is responsible for the submittal of the DMRs, please forward this letter and the enclosed forms to them. The reports cover three months; the dates and location have been filled out. If no discharge occurs during the reporting period, check "No" in section one. The reports must be post-marked by the last day of the month following the end of each reporting period. All original DMR forms should be sent to NDDoH and a copy should be kept for your files. **EPA no longer requires a copy of the DMR form.**

If any other testing is conducted during this project, copies of the results of any such test should be forwarded to the Department. **Should you wish to no longer be covered under this permit, you must submit a written request to terminate and cite the reasons for termination.** Coverage shall be maintained until a written notification to release has been issued to the permittee by NDDoH. Should you have any questions about your permit or how to complete the DMRs, please contact me at (701) 328-5234.

Sincerely,

Marty Haroldson  
Environmental Scientist  
Division of Water Quality

Enc.

Cc: EPA

Environmental Health  
Section Chief's Office  
701.328.5150

Division of  
Air Quality  
701.328.5188

Division of  
Municipal Facilities  
701.328.5211

Division of  
Waste Management  
701.328.5166

Division of  
Water Quality  
701.328.5210



Bismarck Office  
116 North 4th Street, Suite 200  
Bismarck, North Dakota 58501  
Tel 701.258.6622 Fax 701.258.5957  
www.swca.com

July 9, 2012

Attn: Mr. Marty Haroldson  
918 East Divide Avenue, 4th Floor  
Bismarck, North Dakota 58501

**RE: Application for Coverage under NDG07-0000 for the Plains All-American Pipeline, L.P.  
Bakken North Pipeline Project: ND PSC Docket Number PU-10-630**

Dear Mr. Haroldson,

Please find attached an *Application for Permit to Discharge (NDPDES) Industrial-Short Form C*, for the Plains All-American Pipeline, L. P (PAA) Bakken North Pipeline Project. The proposed project is a crude oil pipeline located in Williams County, North Dakota and is regulated by the North Dakota Public Service Commission.

As proposed, PAA would discharge approximately 500,000 gallons of freshwater per day for approximately three 24-hour periods. Discharge, as proposed, would occur in September 2012. PAA proposes to utilize water from the Trenton Water Depot, which pulls water from Trenton Lake, near Trenton, North Dakota. PAA would use sediment filter bags, straw rolls, and other sediment removal devices as necessary to remove sediment from the water prior to discharging testwater to agricultural fields and subsequently ephemeral drainages.

Please feel free to contact me with any questions or information requests at 701-258-6622 or [mcook@swca.com](mailto:mcook@swca.com)

Regards,

A handwritten signature in black ink that reads "Michael Cook". The signature is written in a cursive, flowing style.

Michael Cook  
Natural Resources Lead-Bismarck



**APPLICATION FOR PERMIT TO DISCHARGE  
(NDPDES) INDUSTRIAL-SHORT FORM C**  
NORTH DAKOTA DEPARTMENT OF HEALTH  
DIVISION OF WATER QUALITY  
SFN 8319 (1-96)

FOR DEPT USE ONLY

Application Number	_____
Date Received	_____

Organization Responsible for Facility <i>Plains All-American Pipeline, L.P.</i>			
Individual Responsible for Discharge <i>Mike Bondurant</i>		Phone Number <i>307-673-9709</i>	
Mailing Address <i>Po Box 683</i>	City <i>Sheridan</i>	State <i>WY</i>	Zip Code <i>82801</i>
Brief description of nature of operations which produce the discharge <i>Hydrotest of ~ 12.75-inch diameter pipeline to test structural integrity</i>			

Check all possible substances which discharge may contain:

<input type="checkbox"/> Aluminum	<input type="checkbox"/> Beryllium	<input type="checkbox"/> Chromium	<input type="checkbox"/> Cyanide	<input type="checkbox"/> Mercury	<input type="checkbox"/> Phenols	<input type="checkbox"/> Zinc
<input type="checkbox"/> Arsenic	<input type="checkbox"/> Cadmium	<input type="checkbox"/> Copper	<input type="checkbox"/> Lead	<input type="checkbox"/> Nickel	<input type="checkbox"/> Selenium	<input type="checkbox"/> Other _____

**METHOD OF TREATMENT IS TO ROUTE WATER TO:**

<input type="checkbox"/> Municipal Sewer System	Owner of System	If discharge is to a municipal sewer system, skip to signature area at bottom.	
OR	<input type="checkbox"/> Evaporation Lagoon or Ponds	Number of Ponds	Size of Each (Acres)
OR	<input checked="" type="checkbox"/> No Treatment, Goes to Surface Waters Directly	Name of Body of Water	
OR	<input checked="" type="checkbox"/> Other (Specify) <i>Discharge will be treated through use of dewatering bags and straw roll dewatering structures</i>		

Method of Treating Sanitary Wastes (if different from above)

\_\_\_\_\_

**TYPE AND AMOUNT OF WASTE WATER DISCHARGED TO TREATMENT SYSTEM(S) OR WATER OF THE STATE**

<input type="checkbox"/> Sanitary Wastewater _____ gal/day	<input type="checkbox"/> Cooling Water _____ gal/day	<input checked="" type="checkbox"/> Hydrostatic Testing <i>500,000</i> gal/day
<input type="checkbox"/> Process Water _____ gal/day	<input type="checkbox"/> Surface Runoff Water	<input type="checkbox"/> Other: Type _____ / _____ gal/day

Frequency of Discharge from Treatment Facility (if only certain months please indicate): *September / 3 24-hour periods*

Number of Separate Discharge Points:  1  2  3  4 or more

If more than one, attach sheet with locations and types of waters handled at each point.

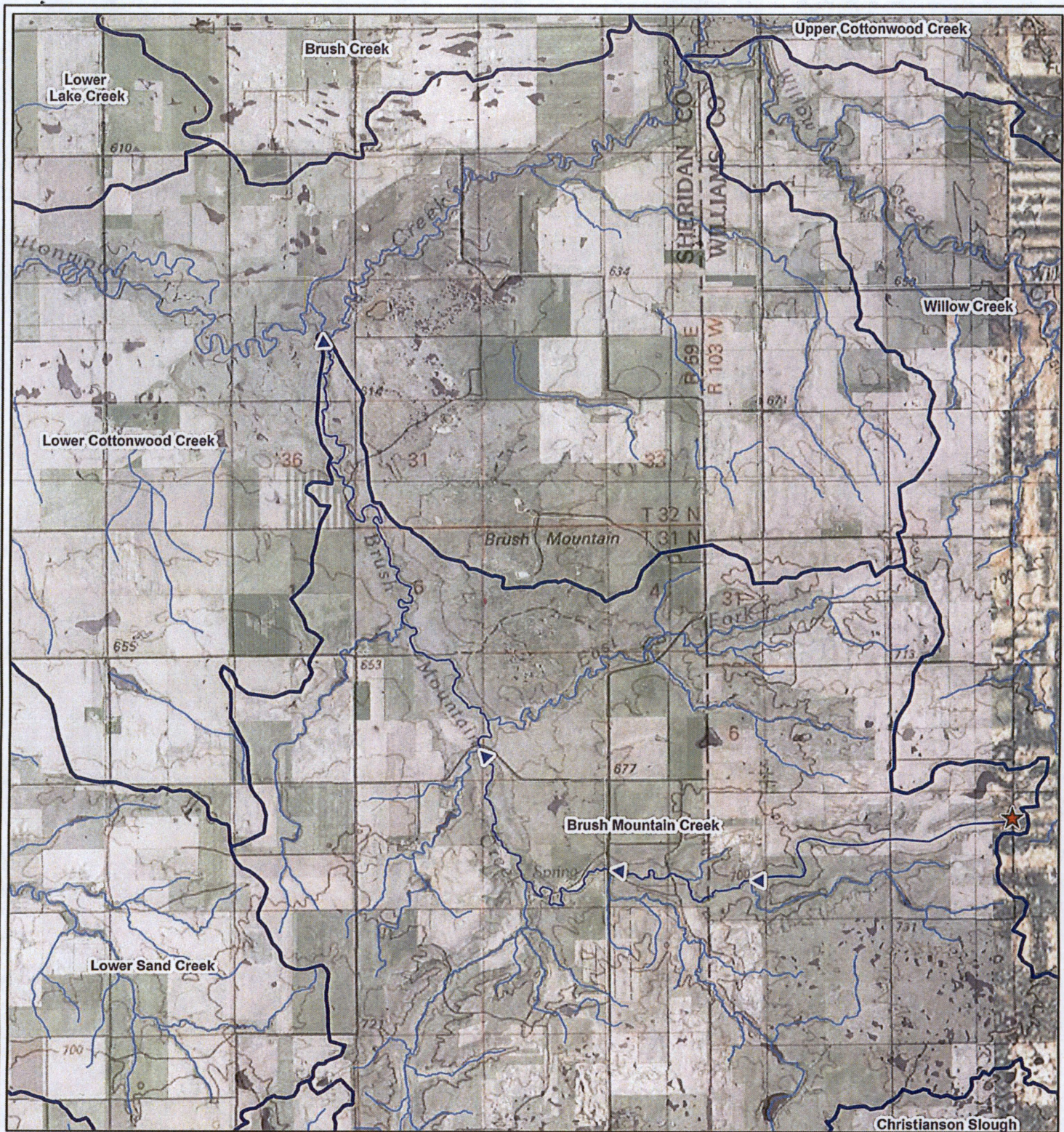
DISCHARGE POINT LOCATION	Latitude		Longitude		County
	OR	1/4	1/4	Section	Township
	<i>48° 26'</i>	<i>33.026"</i>	<i>103° 59'</i>	<i>37.749"</i>	<i>Williams</i>

Provide a brief description of area to which treated discharge flows (i.e., over, unnamed stream, hand-dug ditch, lake, etc.). Use names whenever possible.  
*Flow would travel southwest across agricultural fields for approximately 0.5 mile before entering an ephemeral channel. In total, water would flow ≥ 12.5 miles until discharging into a perennial waterbody (Brush Mountain Creek)*

RETURN COMPLETED APPLICATION TO:  
North Dakota Department of Health  
Division of Water Quality  
918 East Divide Avenue, 4<sup>th</sup> Floor  
Bismarck, ND 58501-1947  
Telephone: 701.328.5210

**CERTIFICATION:**  
I certify I am familiar with NDCC 61-20-08 and with the information contained in this application. To the best of my knowledge and belief the information in this application is true, complete and accurate.

Name of Applicant <i>M. Michael Bondurant</i>	Title <i>Project Manager</i>
Signature of Applicant <i>M. Michael Bondurant</i>	Application Date <i>07/09/2012</i>



## Legend

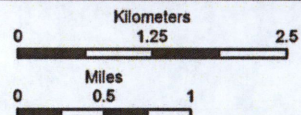
- ★ Proposed Location
- Flow Direction
- Flowline
- ▭ Watershed Boundary

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ENVIRONMENTAL CONSULTANTS

116 North 4th Street  
Suite 200  
Bismarck, ND 58501

Phone: 701.258.6622  
Fax: 701.258.5957

[www.swca.com](http://www.swca.com)



Base Map: Aerial Imagery  
USGS 7.5' Topographic Map  
Source: esri ArcGIS service  
Quadrangle: West Bonetrail (1977)  
T. 157N, R. 103W  
Williams County, North Dakota

Scale: 1:65,000 NAD 1983 UTM Zone 13N

