

Stateline 1 & 2 Gas Plants
Williams County, ND
ONEOK Rockies Midstream, LLC
(Formally Bear Paw Energy, LLC)
ND PSC Case No. PU-10-666
Keitu Project No. 569-210

Post-Construction Inspection Report

August 2014



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Executive Summary

The State of North Dakota, acting through its North Dakota Public Service Commission (NDPSC), Division of Public Utilities, has contracted Keitu Engineers & Consultants, Inc. (Keitu) to perform consulting services for post-construction siting inspections. This report addresses the Orders established by the NDPSC and issues established in File No. PU-10-666. The Stateline 1 & 2 Gas Plants (Plant) is located in Williams County, ND. The Plant is owned and operated by ONEOK Rockies Midstream, LLC (ONEOK). Construction for the Project began in May 2011 and was completed in December 2012. The purpose of the construction inspection was to ensure the Project was constructed in compliance with the siting laws, rules, and the applicable PSC Order for the Project. Prior to the construction inspection, Keitu reviewed all Project documents to identify any and all aspects requiring site verification.

The site was visually inspected on August 13, 2014 by Keitu staff. An onsite interview with Plant employees was also conducted at this time. Overall, the project was very well-maintained and in good condition. It appeared to be constructed as planned with numerous efforts to minimize impacts. However, there were two non-critical issues that may need to be resolved for the Project to be considered in full compliance. Keitu recommends that the PSC request the following from the company: 1) all permits and licenses obtain to complete Order #4, and 2) paper copy and electronic as-built facility design specifications that can be imported into ESRI GIS mapping in order to complete Order #30 and #31. The PSC will need to decide whether these recommendations are necessary to fulfill Project obligations. Keitu expects that the follow-up action taken by ONEOK to address these particular issues can be corroborated in writing.

Introduction

The Stateline 1 & 2 Gas Plants (Project) is operated by ONEOK Rockies Midstream, L.L.C. formally known as Bear Paw Energy, LLC (Bear Paw) an indirect, fully owned subsidiary of ONEOK Partners, L.P. (ONEOK). The Project comprises approximately 160 acres. The Stateline Plants each operate independently of each other. However, ONEOK established interconnecting piping between the plants for plant balancing or to provide backup processing capability if one plant is at reduced rates or shutdown. Each plant is a gas processing facility with a design capacity of 100 MMscfd utilizing a cryogenic turboexpander process. The facility will process associated natural gas from oil production wells connected to ONEOK's gathering system. The Project is under the jurisdiction of the North Dakota Public Service Commission (PSC), which issued its Findings of Fact, Conclusions of Law, and Order on Case No. PU-10-666 on May 18, 2011, granting a Certificate of Site Compatibility for Energy Conversion Facility No. 22.

Purpose and Scope of Inspection

The North Dakota Energy Conversion and Transmission Facility Act (North Dakota Century Code Chapter 49-22) authorizes the Public Service Commission to determine that the location, construction, and operation of jurisdictional energy conversion and transmission facilities will produce minimal adverse effects on the environment and welfare of the citizens of North Dakota. Construction inspections ensure the Project is constructed in compliance with siting laws, rules, and the applicable Commission Findings of Fact, Conclusions of Law, and Order (Order).

The North Dakota PSC retained Keitu Engineers & Consultants, Inc. (Keitu) to complete a post-construction inspection of the Project. The inspection process included a review of the Application for a Certificate of Site Compatibility, Order, and other applicable documents to determine Project-specific siting and construction requirements; a site visit and inspection of facilities; documentation of compliance; and a report summarizing findings. This report includes, but is not limited to, site visit observations, documentation of compliance deficiencies, and a summary of issues that should be addressed for the Project to be considered complete and in full compliance.

Methods

Keitu reviewed North Dakota siting laws and rules, the Application for a Certificate of Site Compatibility, and the Order for the Project to identify what Project-specific documentation was required for compliance. Keitu then reviewed Project documents in the PSC Online Case Search to identify those siting laws, rules, and Application and Order assertions that already had written verification, those that still required documentation, and those that required physical site verification.

Heather Patch, Staff Engineer, and Sam Swanberg, Staff Consultant, of Keitu visited the Project area on August 13, 2014. The site was visually inspected by Keitu staff led by Wesley Larson, Manager of Processing Operations, and Jonathon Hippe, Supervisor at Stateline. Digital photographs were taken showing typical Project infrastructure and documenting any problem areas (Appendix A).

Orders

The following section includes discussion of a list of components of the Project that were asserted in the Application and Order which could be documented during the post-construction inspection to verify compliance with siting laws, rules and the Order for the Project, via either written documentation or physical site verification. Included are detailed findings and observations from Keitu personnel involved in the post-construction inspection for the Project.

- 1. Certificate of Site Compatibility for Energy Conversion Facility No. 22 is issued to Bear Paw Energy, LLC for the construction, operation and maintenance of the Stateline 1 and Stateline 2 Gas Plants. For purposes of the Certificate, the Site consists of the 160-acre project site.**

On May 18, 2011 the Commission designated an energy conversion facility site for Bear Paw Energy, LLC (now ONEOK Rockies Midstream, LLC) for the construction of two 100 million cubic feet per day gas processing plants (the Stateline 1 Gas Plant and the Stateline 2 Gas Plant) in Williams County, North Dakota approximately 16 miles northwest of Williston, North Dakota. The certificate (Docket #37) was issued in accordance with the Order of the Commission dated May 18, 2011 in Case No. PU-10-666 and was subject to the conditions and limitations noted in the order.

Order #1 is complete.

- 2. The April 25, 2011 Certification Relating to Order Provisions – Facility Siting is incorporated by reference and attached to this order.**

See discussion on each order provision below.

Order Provisions/Facility Siting's

- 1. Bear Paw understands and agrees that the Certificate of Site Compatibility will be issued by the Commission Subject to the conditions and criteria set forth in Chapter 49-22 of the North Dakota Century Code and Chapter 69-06-08 of the North Dakota Administrative Code, and that Bear Paw shall be responsible for compliance with this order and conditions and criteria set forth in the applicable laws and rules.**

On May 18, 2011 the Commission designated an energy conversion facility site for Bear Paw Energy, LLC (now ONEOK Rockies Midstream, LLC) for the construction of two 100 million cubic feet per day gas processing plants (the Stateline 1 Gas Plant and the Stateline 2 Gas Plant) in Williams County, North Dakota approximately 16 miles northwest of Williston, North Dakota. The certificate (Docket #37) was issued in accordance with the Order of the Commission dated May 18, 2011 in Case No. PU-10-666 and was subject to the conditions and limitations noted in the order. No issues of blatant non-compliance with this order and conditions and criteria set forth in the applicable laws and rules have been found during the post-construction inspection.

Order #1 is complete.

- 2. Bear Paw agrees to hold a preconstruction conference prior to commencement of any construction, which must include a Bear Paw representative, its construction supervisor, and a representative of Commission Staff, to ensure that Bear Paw fully understands the conditions set forth in the Commission's order.**

A preconstruction meeting was held to ensure all contractors fully understand the conditions set forth in the Order.

The preconstruction conference (Docket #41) was held on May 19, 2011. In attendance was Patrick Fahn, representing the ND PSC, as well as representatives from ONEOK and Linde Process Plants (ONEOK's contractor).

The conference included a review of the conditions in the Order in detail. The notes contain all action items for the group and the designated project personnel that will be responsible for reporting requirements during the project.

Order #2 is complete.

- 3. Bear Paw agrees to comply with the rules and regulations of all other agencies having jurisdiction over any phase of the proposed energy conversion facility including all city, township, and county zoning regulations.**

ONEOK initiated consultant with numerous federal and state agencies as noted in the Siting Application (Docket #5) for the purpose of environmental resource assessment relative to the potential impacts associated with the siting and construction of the proposed Plants at this location. According to the Siting Application, two federal agencies and five state agencies were notified of the Project. ONEOK also received a recommendation for approval of a Williams County Conditional Use Permit for the gas plant as required by Williams County zoning codes before filing of the siting application.

Order #3 is complete.

- 4. Bear Paw agrees that it shall obtain all other necessary licenses and permits, and shall provide copies of all licenses and permits to the Commission prior to construction activity associated with the energy conversion facility that requires said license or permit.**

According to the preconstruction conference meeting minutes (Docket #41), Russ Clark stated that ONEOK has the letter of coverage for the storm water pollution prevention plan (SWPPP). ONEOK also has a SHPO approved undiscovered finds plan. Russ Clark stated that the Department of Health does not require the air permit to be in place at the early stages of construction. ONEOK will acquire the permit before the stage of construction where it is required. During the site visit and employee interview, Wesley Larson stated all required licenses and permits were up to date. After a review of the Commission's Project files, it appears not all permits have been supplied to the Commission. Commission can request documentation of permits, if required.

Order #4 is complete contingent on permits being supplied to the Commission upon request.

- 5. Bear Paw agrees to inform the Commission of its intent to start construction on the energy conversion facility prior to the commencement of construction. Once construction has started, Bear Paw shall keep the Commission updated of construction activities on a weekly basis.**

In the preconstruction conference meeting minutes (Docket #41), Mr. Fahn stated that this is a new requirement and would be accomplished by sending out the first weekly construction report. It was agreed on that ONEOK will submit its reports on Tuesdays.

ONEOK informed the Commission of their intent to start on May 22, 2011 (Docket #40) prior to the commencement of construction. Once construction started, ONEOK submitted Weekly Progress reports of construction to the Commission. Four weekly progress reports are missing. Progress reports for weeks ending 8-7-2011, 8-14-2011, 4-22-2012, and 11-18-2012 are missing. Construction progress for the weeks can be inferred by comparing progress reports before and after. It is at the discretion of the Commission to decide whether or not to request this additional documentation.

In Keitu's opinion, Order #5 is complete.

- 6. Bear Paw understands and agrees that the Certificate of Site Compatibility is subject to suspension or revocation and may, in an appropriate and proper case, be suspended or revoked for failure to comply with the Commission's order, the conditions and criteria of the certificate or subsequent modification, or failure to comply with the applicable statutes, rules, regulations, standards, and permits of other state or federal agencies.**

ONEOK has complied with the applicable statutes, rules, regulations, standards, and permits of other state or federal agencies to date. The Commission has not suspended or revoked for failure to comply with the Commission's order, the conditions and criteria of the certificate.

Order #6 is complete.

- 7. Bear Paw agrees to maintain records that will demonstrate that it has complied with the requirements of the Commission's order and the Certificate of Site Compatibility, and that it will preserve these records for Commission inspection at any reasonable time upon reasonable notice.**

According Wesley Larson, records have been maintained that demonstrate compliance. The Commission can request documentation as it requires.

Order #7 is complete.

- 8. Bear Paw agrees to construct and operate the energy conversion facility in the manner described in Bear Paw's application, in any late filed exhibits and supplemental materials, and in accordance with all applicable safety requirements.**

ONEOK constructed the Project in accordance with the application and all applicable safety requirements. Based on site inspection the facility was constructed as proposed to

the Commission. The construction and operation of the facility is in accordance with all safety requirements.

Order #8 is complete.

9. Bear Paw agrees to report promptly to the Commission the presence in the permit area of any critical habitat or threatened species, endangered species, bald eagles, or golden eagles that Bear Paw becomes aware of and which were not previously reported to the Commission.

A review of the weekly construction progress reports (Docket #'s 40, 42, 44, 46-109, 111, 114-120) did not note any critical habitat in the area during construction. No report of any critical habitat of threatened or endangered species, or of bald or golden eagle's notification to the Commission was found in Case File No. PU-10-666.

Order #9 is complete.

10. Bear Paw understands that all cultural resource mitigation plans must be submitted to the North Dakota State Historic Preservation Office and approved prior to the start of any fieldwork and construction activity in the affected area.

A Class I files and records search, and also a Class III pedestrian survey of the entire 160-acre proposed site for archeological and cultural resources was done by SWCA Environmental Consultants (SWCA). These surveys supported a finding of "no historic properties affected" and "no significant sites affected" and was recommended as clearance to proceed as planned by SWCA (Docket #5). The North Dakota State Historical Society issued a concurrence in January 2010 (Docket #4). The North Dakota State Historical Society also issued a letter of concurrence with the Unanticipated Discovery Plan in May 2011 (Docket #43).

Order #10 is complete.

11. Bear Paw understands and agrees that if any cultural resource, paleontological site, archeological site, historical site, or grave site is discovered during construction, it must be marked, preserved and protected from further disturbances until a professional examination can be made by the State Historical Society, a report of such examination is filed with the Commission, and clearance to proceed is given by the Commission.

No cultural resource, paleontological site, archeological site, historical site, or grave site was discovered during construction. This is based on review of weekly construction

progress reports and verification that no correspondence was identified in the Commission's file.

Order #11 is complete.

12. Bear Paw understands and agrees that all buried facility crossings of graded roads shall be bored unless the responsible governing agency specifically permits Bear Paw to open cut the road.

According to the preconstruction conference meeting minutes (Docket #41), Russ Clark of ONEOK stated that there were no roads being open cut or requiring bores.

Order #12 is complete.

13. Bear Paw understands and agrees that all pre-existing township and county roads and lanes used during construction must be repaired or restored to a condition that is equal to or better than the condition prior to the construction of the energy conversion facility and that will accommodate their previous use, and that areas used as temporary roads or working areas during construction must be restored to their original condition.

Existing roads and trails were to be left in a comparable or better condition than what existed before construction. During the site visit on August 13, 2014, access roads to the Project appeared to be well maintained. No existing roads were noted to be in unfavorable condition.

Order #13 is complete.

14. Bear Paw understands and agrees that construction must be suspended when weather conditions are such that construction activities will cause irreparable damage to roads or land, unless adequate protection measures approved by the Commission are taken.

According to the weekly progress report for week ending 11-11-2012 (Docket #118) commissioning work on Stateline 2 gas plant did not occur on 11/9 to 11/11 due to severe winter weather. Based on review of the progress reports, construction was suspended or delayed when weather conditions were such that construction should not occur.

Order #14 was followed.

15. During construction, at least 12 inches of topsoil, where available (or topsoil to the depth of cultivation, whichever is greater), over and along areas where facilities will be placed must be stripped and segregated from subsoil. Any area on which excavated subsoil will be placed must first be stripped of topsoil. After backfilling with subsoil is completed, any excess subsoil must be placed over the excavation area, blending the grade into existing topography. Topsoil must not be placed within the footprint of the facilities, and must be placed over areas containing topsoil.

This item is difficult to verify during a post-construction inspection. Based on previous adherence by ONEOK to the orders and provision, it could be inferred that this item was followed. However, if requested by the commission, ONEOK should provide documentation that the topsoil was replaced properly.

In Keitu's option, Order #15 is complete.

16. Bear Paw understands and agrees that reclamation, fertilization, and reseeded is to be done according to the Natural Resources Conservation Service recommendations, unless otherwise specified by the landowner and approved by the Commission.

Construction activities disturbed soils and vegetation to an extent that would require some reseeded following completion of operations. The majority of the site will not be reclaimed due to the nature of the gas plant operation. During the site visit on August 13, 2014 no issues regarding the reclamation of the surrounding area were noted.

In Keitu's opinion, Order #16 is complete.

17. Bear Paw understands and agrees that its obligation for reclamation and maintenance of the energy conversion facility tower locations, associated facilities, and right-of-ways will continue throughout the life of the energy conversion facility.

Regular maintenance and inspections are performed during the life of the facility to ensure its continued integrity. When problems are found, repairs will be scheduled. The facility is graveled and fenced. ONEOK conducts inspections and service orders are established if maintenance is required.

Based on a post construction inspection, ONEOK has performed reclamation and maintenance of the facility has continued since the facility have been in operation.

Order #17 has been followed to date.

18. Bear Paw agrees to comply with the Tree and Shrub Mitigation Specifications, attached.

According to the Application, no trees required removal for the construction of the Project. No woodland areas were found on the site.

Order #18 is complete.

19. Bear Paw understands and agrees that it shall repair or replace all fences and gates removed or damaged during all phases of construction and operation of the proposed energy conversion facility.

According to the preconstruction conference meeting minutes (Docket #41), Russ Clark stated it is ONEOK policy to repair or replace any broken fences. During the site visit on August 13, 2014 no issues regarding fences and gates removed or damaged were noted.

Order #19 is complete

20. Bear Paw understands and agrees that it shall repair or replace all broken or damaged drainage tile during all phases of construction and operation of the proposed energy conversion facility.

According to the preconstruction conference meeting minutes (Docket #41), Russ Clark stated that the survey did not indicate any drainage tile being on the property.

Order #20 is complete

21. Bear Paw understands and agrees that staging areas or equipment shall not be located on land owned by a person other than Bear Paw unless otherwise negotiated with landowners.

A review of the Project files did not indicate that any temporary staging areas were required on land other than owned by ONEOK.

Order #21 was followed.

22. Bear Paw understands and agrees that it shall remove all waste that is a product of construction and operation, restoration, and maintenance of the site, and properly dispose of it on a regular basis.

A review of the weekly construction reports showed that ONEOK and its contractors were diligent in site cleanup throughout the construction of the Project. No unusual waste was noted during the site visit on August 13, 2014.

Order #22 is complete.

23. Bear Paw agrees that it shall, as soon as practicable upon the completion of the construction of each energy conversion 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.

The majority of the site will not be reclaimed due to the nature of the gas plant operation. The facility is graveled and fenced. During the site visit on August 13, 2014, no issues regarding the reclamation of the surrounding area were noted. Based on a post construction inspection, ONEOK has restored the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.

Order #23 is complete.

24. Bear Paw understands and agrees that it shall provide any necessary safety measures for traffic control or to restrict public access to the energy conversion facility.

ONEOK restricts public access to site. All visitors must check-in at the front office and go through a safety orientation before being allowed to enter the Stateline 1 & 2 Gas Plants.

Order #24 is complete.

25. Bear Paw understands and agrees that it shall advise the Commission of any extraordinary events which take place at the site of the energy conversion facility, including injuries to any person, the death of any threatened or endangered species, within five business days of such event.

No extraordinary events took place, to date, at the site of the energy conversion facility, including injuries to any person, the death of any threatened or endangered species cultural resource, paleontological site, archeological site, historical site, or grave site

discovered during construction. This is based on review of weekly construction progress reports and verification that no correspondence was identified in the Commission's file.

Order #25 was followed.

26. Bear Paw understands and agrees that it shall advise the Commission of the discovery of a large number of dead birds or bats on the site within five business days of such event.

There was no discovery of dead birds or bats on the site. This is based on review of weekly construction progress reports and verification that no correspondence was identified in the Commission's file.

Order #26 was followed.

27. Bear Paw understands and agrees that it shall implement a procedure for how complaints concerning the proposed energy conversion facility will be handled by Bear Paw.

According to the preconstruction conference meeting minutes (Docket #41), Dick Vande Bossche of ONEOK was designated to be the point of contact for all complaints concerning the facility.

Order #27 is complete.

28. Upon request, Bear Paw agrees to provide the Commission with engineering design drawings showing surveyed structure prior to construction.

ONEOK provided sufficient design specifications in the Application and exhibits prior to construction to understand and verify the proposed energy conversion facility. During the preconstruction meeting (Docket #41), Mr. Fahn stated that he did not want to review any further design drawings.

Order #28 was followed.

29. Bear Paw understands and agrees that it shall inform the Commission in writing of any modifications to the energy conversion facility, or of any plans to modify the site plan for the energy conversion facility. Bear Paw understands and agrees to obtain written approval from the Commission prior to any additions or modifications to the site plan for the energy conversion facility, associated facility, and roadway locations. Approval may be granted after notice and opportunity for hearing.

Based on a post construction inspection, ONEOK constructed the plants without major modifications to the original plans submitted to the Commission during the application process. ONEOK understands that it shall inform the Commission in writing of any major modifications to the energy conversion facility in the future.

Order #29 was followed.

30. Bear Paw agrees to provide the Commission with both an electronic and a paper copy of the site approved by the Commission in this proceeding, and will provide this information within three months after the Certificate of Site Compatibility is issued by the Commission. Bear Paw also agrees to provide, within three months after the Certificate of Site Compatibility is issued by the Commission, an electronic version of the approved site that can be imported into ESRI GIS mapping software. This electronic map data must be referenced to the North Dakota coordinate system of 1983, North and/or South zones US Survey feet (NAD 83) UTM Zone 13N or 14N feet (NAD 83), or geographic coordinate system (WGS 84) feet. The vertical data must be in the appropriate vertical datum for the coordinate system used. All submissions must specify the datum in which the data was developed.

ONEOK initially provided sufficient design specifications in the Application and exhibits to understand and verify the proposed energy conversion facility. A review of the Project files did not indicate whether or not ONEOK had provided electronic copies of the design specifications. If not already done so, ONEOK should provide an electronic as-built facility design specifications that can be imported into ESRI GIS mapping in order to complete Order 30.

31. Bear Paw agrees to provide the Commission with both an electronic and a paper copy of the design specifications for the construction of the energy conversion facility showing the location of the energy conversion facility as built, and will provide this information within three months of the completion of the construction. Bear Paw also agrees to provide an electronic version of the as-built facility design specifications that can be imported into ESRI GIS mapping software within 3 months of the completion of the construction. This electronic map data must be referenced to the North Dakota coordinate system of 1983, North and/or South zones US Survey feet (NAD 83) UTM Zone 13N or 14N feet (NAD 83), or geographic coordinate system (WGS 84) feet. The vertical data must be in the appropriate vertical datum for the coordinate system used. All submissions must specify the datum in which the data was developed.

ONEOK initially provided sufficient design specifications in the Application and exhibits to understand and verify the proposed energy conversion facility. A review of the Project files did not indicate whether or not ONEOK has provided final as-built electronic and paper copies of the design specifications. If not already done so, ONEOK should provide a paper copy and electronic as-built facility design specifications that can be imported into ESRI GIS mapping in order to complete Order 31.

32. Bear Paw understands and agrees that it shall work with landowners and residents to mitigate any increase in television and residential radio interference that results from the construction of the energy conversion facility.

No record of television or residential radio interference was found in the Commission's file.

Order #32 is complete.

33. Bear Paw understands and agrees that the authorizations granted by the Certificate of Site Compatibility for the energy conversion facility are subject to modification by order of the Commission if deemed necessary to protect further the public or the environment.

A review of the Project files did not indicate that any authorizations granted by the Certificate of Site Compatibility for the energy conversion facility were modified by the Commission to date.

Order #33 is complete.

34. Bear Paw understands and agrees that in the event Bear Paw desires to construct, within any site granted by a Certificate of Site Compatibility in this proceeding, a new energy conversion facility that was not requested in Bear Paw's application in this proceeding, Bear Paw shall apply for a Certificate of Site Compatibility for the new facility.

A review of the Commission's files does not indicate that ONEOK has submitted an additional application for certificate of site compatibility for the construction of a new energy conversion at the Site. ONEOK understands it shall apply for a Certificate of Site Compatibility for a new facility if required in the future.

Order #34 was followed.

3. Bear Paw shall notify the Commission, as soon as reasonably possible, if any damage, as defined by North Dakota Century Code Chapter 49-23, occurs to underground facilities during construction conducted under the certificate issued in this proceeding. In the event of any damage to underground facilities, Bear Paw shall suspend construction in the vicinity of the damage until compliance with One-Call Excavation Notice System requirements under North Dakota Century Code Chapter 49-23 has been determined and clearance to proceed has been given by the Commission.

A review of the Commission's files found no report of any damage to underground facilities during construction.

Order #3 is complete.

4. The site certificate is subject to suspension or revocation and may, after hearing, be suspended or revoked for failure to comply with the Commission's order, requirements of the One-Call Excavation Notice System under North Dakota Century Code Chapter 49-23, the conditions and criteria of the certificate or permit or subsequent modification, or failure to comply with applicable statutes, or rules, regulations, standards, and permits of other state or federal agencies.

ONEOK has complied with the conditions and criteria of the Certificate of Site Compatibility for Energy Conversion Facility No. 22 granted by the Commission. A review of the Commission's files does not indicate the site certificate has been suspended or revoked for failure to comply with any applicable statutes, or rules, regulations, standards, and permits of other state or federal agencies.

Order #4 is complete.

Conclusions

Overall, the Project appeared to be constructed as designed with minimal impacts to the surrounding natural and human environment. The Project site was in good condition and well maintained. Keitu recommends that the PSC request the following from the company: 1) all permits and licenses obtain to complete Order #4, and 2) paper copy and electronic as-built facility design specifications that can be imported into ESRI GIS mapping in order to complete Order #30 and #31. The PSC will need to decide whether these recommendations are necessary to fulfill Project obligations. Keitu expects follow-up action taken by ONEOK to address these particular issues can be corroborated in writing.

The project has been constructed in compliance with the siting laws and rules and applicable Commission orders with exception of the items noted within the body of the report. I declare that, I have the specific qualifications based on education, training, and experience to assess a project of this nature.

Sincerely,

Nathan J. Gaffrey, PE
Project Engineer

Appendix A – General Project/ Plant Pictures



Picture 1 Inlet Gas Piping



Picture 2 Fractionator Column



Picture 3 Pipe Racks



Picture 4 Pipe Racks with Fractionation column in the background



Picture 5 Stormwater Retention Pond



Picture 6 Fractionation Column



Picture 7 Compressor Buildings



Picture 8 Product Storage



Picture 8 Liquids Storage for Trucking