



July 30, 2012

Mr. Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480

**RECEIVED**

JUL 31 2012

**PUBLIC SERVICE COMMISSION**

RE: PU 12-040 Plains Pipeline L.P.: Nelson to Ross Pipeline - Mountrail Co., ND

Mr. Nitschke:

On April 25, 2012, Plains Pipeline, L.P. (Plains), received a Certificate of Corridor Compatibility (#133) and a Route Permit (#143) for its Nelson to Ross Pipeline project from the Public Service Commission (Case No. PU 12-040). Plains is seeking authorization for one minor route modifications as fully described in the enclosed documents. Please find one original and three copies of the following route amendment application to existing permits for Case No. PU 12-040: Nelson to Ross Crude Oil Pipeline Project.

Upon your review, should you have questions or seek additional information please contact me at 651-282-0650 or via e-mail at [wmccarthy@go2e3.com](mailto:wmccarthy@go2e3.com).

Best Regards,

A handwritten signature in blue ink, appearing to read 'William F. McCarthy'.

William F. McCarthy  
E3 Environmental, LLC

Enclosures- (4) North Dakota Public Service Commission Route Amendment Application

CC: I. Jim Fleetwood, Plains Pipeline  
M. Walcavich, Plains Pipeline  
E3 Project Files

## **Introduction**

On April 25, 2012, Plains Pipeline, L. P. (Plains), received a Certificate of Corridor Compatibility (# 133) and a route permit (#143) for the Public Service Commission (Commission) Case No. PU-12-040. This pertains to the construction of a crude oil pipeline located in Mountrail County, North Dakota (Project). As stated under North Dakota Century Code, Section 49-22-07, a utility may not begin construction of a transmission facility in the state without first having obtained a route permit. The facility must be constructed, operated, and maintained in conformity with the permit and any terms, conditions, or modifications of the permit.

Normal construction sequence includes centerline staking of the approved alignment. On or about June 29, 2012, as centerline staking progressed pipeline constructability issues were identified associated with the approved pipeline route due to a well pad and its associated infrastructure. Subsequent engineering studies have produced a preferred route alternative to avoid the well pad and its associated infrastructure that encroaches into the approved workspace and alignment. A minor modification of the original alignment entailing an off-set from the approved centerline for an approximate length of 7,200 feet, all of which will remain within the Certificated Corridor, would be required to facilitate construction and future operation of the pipeline. The proposed route modifications would result in off-sets from the approved route ranging in magnitude from 13 feet to 27 feet for the majority this request. While at the eastern terminus, at the well pad, Plains has engineered a route alternative which avoids the well pad and streamlines construction but requires an alignment modification of approximately 400 feet in length, all of which would remain within the Certificated Corridor.

This request will not result in any modification to previously reported facility type, size or design including above ground facilities.

This request shall conform to all previously approved mitigation measures as well as right-of-way preparation and reclamation measures.

This request shall not impact any Exclusion or Avoidance Areas and shall conform with the Siting Criteria as previously reported.

All supporting attachments have been previously filed with the Commission except for the engineering detail of the proposed off-set alignment.

## Project Location

The proposed route amendment occurs between MP 10.2 and MP 11.6 which is located in the following sections of Mountrail County, North Dakota:

- T156N, R93W, Sec 36, NE ¼
- T156N, R92W, Sec 31
- T156N, R92W, Sec 32, SW ¼

## Route Amendment

Plains requests Commission approval of a minor route modification to accommodate construction workspace requirements and future operating needs to accommodate an existing well pad and it's respective utilities. Please refer to the attached engineering drawing for additional details. The proposed route deviation includes:

- Various offsets ranging from 13 feet to 27 feet of the approved alignment to include consistent and equal offsets to:
  - Construction right of way; and
  - Permanent right of way.
- Well pad reroute
  - Pipeline routing realignment around well pad – proposed northerly alignment achieves avoidance, maintains preferred alignment.
- Total length of offsets and well pad reroute request:
  - 7,200 feet
    - Beginning at Station 534+00
    - Ending at Station 606+00

## Route Analysis and Findings

The requested route modification and all associated workspace will occur entirely within the area previously surveyed for natural and cultural resources. These environmental survey limits coincide with the boundaries of the Certificate of Corridor Compatibility previously issued for the Project.

The requested route modification shall not result in new or additional impacts to natural or cultural resources and shall conform with the results and conclusions as previously reported.

### Attachments:

- Re-route Engineering Drawing
- Figure M1 - route overview (previously filed with original application)
- Proposed Route Overview #4 – original alignment and survey corridor (previously filed with amended route)

- Figure SC-6, Siting Criteria – mapped natural resources within re-route area (previously filed with amended route)
- Figure SC-CR-06, Siting Criteria – mapped cultural resources within re-route area (previously filed with amended route)