

**Fahn, Patrick J.**

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**From:** Ron Marsh <ron-marsh@earthlink.net>  
**Sent:** Tuesday, February 21, 2012 2:37 PM  
**To:** Fahn, Patrick J.  
**Subject:** Pro Pipe Corp - Belle Fourche Pipeline Incident  
**Attachments:** Belle Fourche Leak - Incident Report rjm.docx; Belle Fourche Incident - What went wrong.docx; Incident Reports.pdf

Dear Sir,

I received the letter from you this past weekend. I look forward to complying and providing you with the requested information in regards to this incident.

I have attached some documents that were generated due to this incident.

First report – timeline

Second Report – Root Cause Analysis and Expectations of excavation procedures of Live or utility line crossings

Third – Operator statement, Incident Report, and JSA

We at Pro Pipe Corporation take these matters very seriously. I am a native of Montana. Born and raised in Plentywood, Mt and I attended college at Minot State College from 1978-1982. So I have a vested interest and promote good stewardship toward the land and our communities here in North Dakota and Montana. We have worked in North Dakota for over 10 years and have been present since 2007 on a year around basis.

We have instilled measures to make sure that this does not happen again.

Our operator was at fault for making assumptions that led up to this incident. For that we are held accountable. The documentation of how we responded to the incident, provided assurance to the landowners, utilized third party environmental contractors and labs for soil testing purposes to insure cleanup and disposal of the oil impacted material, should indicate our sincerity to remediating this event.

If there is anything that I have failed to do to, please let me know. I will do everything in my power to fulfill your requests.

Sincerely,

Ron Marsh, President  
Pro Pipe Corporation  
406-626-5633 O  
406-626-5641 F  
406-239-0996 C

Belle Fourche Leak,

12/6/11

11:00am – Excavator hit crude oil line (Operator did not think that the line was where he hit it). Operator – covers oil leak with bucket and keeps it from spraying out of the ditch. Operator Calls Pro Pipe Supervisor.

Bridger shuts down pipeline with pressure loss. Shuts isolation valves.

11:30 pm Pro Pipe Supervisor arrives on site to mitigate and evaluate situation

11:30 – 12:30 I was notified by my Supervisor

12:35pm I was calling for Vac trucks to suck up oil.

1:30 – Cleanup efforts had begun, Vac Trucks on site moving oil back up to the Bridger tank. Crew members sent to town for additional plastic and absorbent pads to assist with cleanup and building containments for oil impacted material. Additional equipment was started to be moved in to help with cleanup. Incident report was discussed and information about the incident compiled.

Bridger Control center begins contact of land owner of the release. Land owner was contacted by evening.

Approximately – (5:30pm) – I spoke with landowner Tim Taylor of Watford City and set a meeting for the next day.

Also during this time I was contacted by the North Dakota Dept of Emergency Services and Health to make sure the incident was under control and public safety was established. All of this had taken place.

7:30pm – free liquid oil was cleaned up

12/7/11

7:00am light plants on site, Safety meeting and JSA held, operator that struck the pipe was interviewed and a statement was taken. Crew members began residual cleanup with Vac truck of free liquids and removing oil impacted material in the leak site to begin repairs. Remaining oil was evacuated from the pipeline and prepared for repair.

Cleanup efforts continued through the day.

3:00pm I met with Tim Taylor in Watford City and discussed the cleanup efforts with him.

Approximately ( 6:30 pm pipeline repairs were made by our welders ) and the refill and return to operation began.

Also during this day, Labs were contacted, Disposal sites were contacted, Third party environmental contractors were being contacted.

Chris Roberts from the North Dakota Department of Health from Bismarck was on site and approved the cleanup operation.

12/8&9/2011 (Safety meetings are documented on a daily basis throughout all our construction phases.)

Cleanup efforts resumed of removing impacted material. Mr. Roberts came by again and signed off on the incident completing his site investigation. Again he approved the procedures and direction of the cleanup efforts.

12/10/11

Removal of all visible impacted material was completed. Advanced environmental is traveling today and will be onsite in the AM.

12/11/11

By December 11<sup>th</sup> Advanced Environmental ( Nick Kunz) was on site to complete soil testing to assist in the removal of any impacted material that was not cleaned up during initial cleanup operations. This operation went on through December 13<sup>th</sup>. All impacted material was stored in containments to be later hauled to disposal site after Lab results were sent back to Pro Pipe and Indian Hills Disposal.

12/17/11

Hauling of clean fill back into the excavation began this day.

12/19/11

Lab results are back. Plans were made to begin hauling impacted material to the disposal after 1/3/12. ( Indian Hills allocations were full until after 1/1/12)

1/4thru7/12

Hauling operations began with the hauling of impacted materials to Indian Hills Disposal. Cleanup operations continued with the hauling of clean fill materials back into the excavation. Cleanup operation complete by 1/7/12.

2/3/12

Spoke with Larry Novak on the bill for clean fill material. Calls into Bridger/Belle Fourche Pipeline and the Landowner Tim Taylor to reach settlement agreements.

Since this time we have exposed and crossed 14 pipeline and fiber optic lines in Williams, McKenzie and Mountrail counties in North Dakota. This was the first Crude Oil incident in the history of our company.

Sincerely,

Ron Marsh, President  
Pro Pipe Corporation  
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## Belle Fourche 8" Pipeline Incident

After careful review, the contributing factors to the release were established:

1. One call had been made and updated one time, but was expired at the time of the incident.
2. After successfully exposing and excavating around the Belle Fourche 6" pipeline, Pro Pipe Corporation supervisor left the excavation site to attend to another task. He had full confidence in the operator as he had excavated around live lines for him on this project and had 12 years of operating experience.
3. The Pro Pipe Corporation equipment operator assumed the 8" line was in a different location, as the lines are not completely parallel at the incident site.
4. No Belle Fourche pipeline representative was present for the excavation activities.

Corrections to Pro Pipe Corporation excavation activities:

1. Pro Pipe Corporation has designated an individual in the administration to update the current One Calls every 8 days to avoid the 10 day expiration dates of the one calls. Each project supervisor has been given their own ID number within the company to address the one calls they have made.
2. All foreign line crossings will have a Pro Pipe Corporation supervisor present. All foreign line crossings will be hydro-excavated and clearly present to the naked eye. In this case the incident site had been hydro-excavated and marked prior to activities that led to the incident. But appeared to me that the inspection hole was lost during construction.
3. All Foreign line crossings will be hydro-excavated in two locations to identify the true direction of the line and depth it is buried. Mechanical excavation will only be allowed to within 2' of the live lines. Hand excavation or hydro-excavation methods will be the only acceptable means of exposing a live line.

4. No foreign line crossing will be excavated without a member of the Gas, Oil or Utility Company being present to observe and double check line orientation.

In summary assumptions were made; the oil company representatives were not on site, the supervisor left the site assuming the operator had complete control of the situation, the operator assumed the location of the live line and hit the line.

We have been in the pipeline construction business since 1999. This is the first time we have been involved in an oil release that was caused by our operator. Since the incident we have successfully crossed over 14 live line crossings as we continued our projects in the State of North Dakota.