

**BASIN ELECTRIC  
POWER COOPERATIVE**

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May 13, 2013

Darrel Nitschke, Executive Secretary  
North Dakota Public Service Commission  
600 East Boulevard Avenue, Dept. 408  
Bismarck, ND 58505



RE: PU-12-509

Dear Mr. Nitschke:

Basin Electric Power Cooperative (Basin Electric) requests that the North Dakota Public Service Commission (Commission) consider our request and grant approval of the following modification to the Pioneer Generation Station Phase II energy conversion facility (Project).

The Project, described in the Application for a Waiver of Procedures, and Consolidated Certificate of Site Capability (Application) has been modified slightly to provide additional on-site anhydrous ammonia storage.

Anhydrous ammonia is utilized as a reagent in the selective catalytic reduction (SCR) system for control of oxides of nitrogen. The use of an ammonia-based SCR system is required in order to acquire a Permit to Construct from the North Dakota Department of Health for the Project.

The Project, as described in the application, incorporated a single 2,000 gallon anhydrous ammonia storage tank. Basin Electric determined that additional anhydrous storage was required due to potential shortages of timely reagent deliveries to locations in northwest North Dakota from suppliers. In order to relieve the risk of on-site reagent shortages, a second storage 2,000 gallon storage tank is being proposed. The second tank will be located immediately adjacent to the location of the first one.

The existing tank area is designed with secondary containment. This containment area can accommodate the additional tank with no additional modifications required other than additional inter-connective piping.

The Emergency Planning and Community Right-To-Know Act (EPCRA) and Section 112 (r) of the Clean Air Act require facilities that have greater than 10,000 pounds of anhydrous ammonia on-site to comply with the program requirements. With the addition of the second 2000 gallon storage tank the 10,000 limit will be exceeded and the Pioneer Generating Station will be subject to aspects of these regulations. Compliance with these regulations will be satisfied with the development and implementation of a site specific Risk Management Plan. When completed a copy of the Risk Management Plan will be submitted to the Commission.

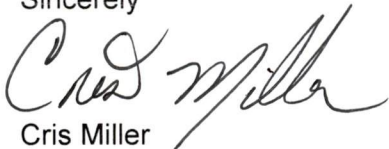
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The Findings of Fact, Conclusions of Law and Order for the Project were approved on March 27, 2013. Paragraph 1 of the Order provides, "Certificate of Site Compatibility No. 33 is issued to Basin Electric Power Cooperative authorizing the construction, operation and maintenance of two nominal 45 MW simple cycle aero derivative natural gas combustion turbines and associated facilities as identified in the application." Since this is a proposed change from what was provided for in the Application, Basin Electric is requesting approval from the Commission to add an additional tank.

Your attention to this request is greatly appreciated. Should you have questions or require additional information, please contact me at your convenience. I can be reached at (701) 557-5635 or by e-mail at [cmiller@bepc.com](mailto:cmiller@bepc.com).

Sincerely

A handwritten signature in black ink, appearing to read "Cris Miller". The signature is fluid and cursive, with the first name "Cris" being more prominent than the last name "Miller".

Cris Miller  
Senior Environmental Project Administrator

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cc: Myron Steckler  
Casey Jacobson