



Pipeline and Station Contractors

Mr. Aaron A Morman
Public Service Commission
State of North Dakota
600 East Boulevard, Dept. 408
Bismarck, North Dakota 58505-0480



Re: Third Party Damage Complaint

Dear Mr. Morman

Thank you for the opportunity to explain the details surrounding the One Call event on August 17, 2013. As a pipeline installation contractor we clearly understand the importance of the One Call system. The information below explains the sequence of events, our role and the corrective actions implemented. The August 17th emergency call was made in reference to the previously installed Tioga Lateral for Alliance Pipeline.

- August 8th 2013 One Call Request #13126684 was submitted to remark the 70st NW road bore location in advance of restoration work activities. The work started on Monday August 12th and was completed that week. As a result of the restoration work existing utility staking marks were no longer visible.
- On August 17th Minnesota Limited was notified by Alliance Pipeline that the bore pipe under 70th Street NW did not have adequate cover and that the line needed to be lowered. The crew was aware that Alliance Pipeline was going to start pipeline gas purge and pressurization on August 20th.
- As a company that responds to pipeline incidents, including explosions and fires, we understand the importance of making sure the finished installation meets established requirements. Knowing that the line had to be lowered, and that gas was essentially on the way, our crew recognized that prompt action was needed. Because notification to us fell on a Saturday the crew felt that the circumstances did create an "emergency" in order to get the area re-staked. From previous work we knew what utilities were in the area, but to maintain our safe work practices we wanted them remarked. Our first attempt was to contact the utility directly outside of the one call system to see if we could expedite the matter locally. When that was unsuccessful, the decision was made to make the emergency staking request.

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Response to third-party damage complaint

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Recognizing that our project supervision misinterpreted the NDOC Emergency Request criteria we are retraining all one call requestors, and management team members regarding one call practices and requirements.

From my research Minnesota Limited does not have a prior violation or complaint with the Public Service Commission, State of North Dakota. While any financial penalty always has an impact, we have the financial resources necessary if we receive a penalty.

Of greater concern is our reputation, and the morale of our work crews. Prevention of utility damage is a point of pride for our crews. They work diligently to identify underground utilities in advance including using soft dig techniques to pothole line locations. We continue to partner with owners and utilities to develop the best approach possible to prevent utility damage incidents.

Thank you for your consideration. Please contact me with any questions.

Sincerely

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