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June 10, 2014

via hand delivery

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



Dear Mr. Nitschke:

In re: North Dakota Pipeline Company LLC
Sandpiper Project – Siting Application
Case No. PU-13-848
Our File No. 31-411-010

Enclosed for filing are an original and ten (10) copies of the following documents:

1. Supplement to Late Filed Exhibit No. 2;
2. Supplement to Late Filed Exhibit No. 4; and
3. Affidavit of Barry Simonson (part above-referenced Supplements; the original will follow by U.S. Mail).

Electronic copies of the same have also been filed with the Commission via e-mail. If you have any questions, please let me know.

Please call should you have any questions.

Very truly yours,

A handwritten signature in black ink, appearing to read "B R B".

Brian R. Bjella

bw
Enc.

cc: Mitch Armstrong
Brian Schmidt
Julie Prescott

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

North Dakota Pipeline Company LLC
24-Inch Crude Oil Pipeline – Sandpiper Project
Siting Application

Case No. PU-13-848

AFFIDAVIT OF BARRY SIMONSON

STATE OF WISCONSIN)
) ss.
COUNTY OF DOUGLAS)

Barry Simonson, being first duly sworn upon oath, states and alleges as follows:

1. I am the Senior Manager of Engineering and Construction for Sandpiper Mainline Execution, Major Projects, for the Sandpiper Pipeline Project (“Project”), which is the subject of the above-captioned matter.

2. I provide this Affidavit in support of North Dakota Pipeline Company LLC’s (“NDPL”) re-route requests, as set forth in NDPL’s Supplement to Late Filed Exhibit No. 2 and Late Filed Exhibit No. 4.

3. During the Grand Forks public hearing on NDPL’s Application for a Certificate of Corridor Compatibility and Route Permit (“Application”) for the Project, Mr. Scott Salmonson requested that NDPL consider re-routing the Project to the north of its proposed route across his property, located in Section 15, Township 150 North, Range 50 West, Grand Forks County. See Salmonson Exhibit No. 1. Mr. Salmonson testified that his proposed re-route would avoid homes and home sites, and would reduce the number of turns in the pipeline. *Id.*

4. NDPL analyzed Mr. Salmonson’s requested re-route and concluded that, in addition to addressing Mr. Salmonson’s concerns, the re-route was feasible from an

engineering perspective, would reduce the number of bends required, and would be approximately the same length.

5. The Gunderson-Salmonson Re-route begins just west of mile post ("MP") 297, where it turns and extends to the northeast of the original route. In Section 10, Township 150 North, Range 50 West, the proposed re-route turns to the east and extends into Section 11, Township 150 North, Range 50 West, where it turns to the southeast and then joins with the original proposed route just west of MP 298. The re-route is approximately 1.37 miles long. A map depicting the proposed re-route is attached as Exhibit A.

6. NDPL has obtained all easements needed for the re-route, except for an easement from Bremer Bank. Bremer Bank has indicated that it is willing to execute an easement, but needs to correct certain title issues before it can do so.

7. Also during the Grand Forks public hearing, University of North Dakota ("UND") representatives requested that the Project route avoid the Oakville Environmental Research Station, located in Section 16, Township 151 North, Range 52 West, Grand Forks County. See Johnson Exhibit Nos. 1 and 2, and Seabloom Exhibit No. 1.

8. Following the hearing, NDPL met with representatives of UND to discuss the Project and potential ways to address UND's concerns, as indicated in the joint letter submitted by NDPL and UND as Late Filed Exhibit No. 2.

9. Based on further discussions with UND representatives, both UND and NDPL agree that the only way to fully address the parties' mutual goals and concerns is to re-route the Project to follow the route proposed by UND representatives at the Grand Forks public hearing (the "Oakville Prairie Re-Route"). By routing around the Oakville Environmental

Research Station, the Project avoids any potential impact to UND's current and future research activities.

10. The proposed Oakville Prairie Re-route avoids the Oakville Environmental Research Station in Grand Forks County by routing around the Station parcel to the south. The Oakville Prairie Re-route begins at MP 280.3 in Section 17, Township 151 North, Range 52 West, where it turns and extends south from the original proposed route. In the northeast corner of Section 20, Township 151 North, Range 52 West, the re-route turns and extends in a northeasterly direction, until it reconnects with the original proposed route at MP 283.5 in Section 23, Township 151 North, Range 52 West. The Oakville Prairie Re-route is approximately 3.78 miles long. A map depicting the proposed re-route is provided as **Exhibit B**.


11. NDPL has acquired all easements needed for the Oakville Prairie Re-route from the affected landowners.

12. NDPL analyzed the impacts of each re-route in accordance with the Commission's siting criteria set forth in North Dakota Administrative Code, Section 69-06-08-02. NDPL completed a desktop analysis, and no exclusion or avoidance areas are crossed by either re-route.


13. NDPL will complete cultural resource field surveys along the re-routes to confirm that no cultural resources are present, and will coordinate with the North Dakota State Historic Preservation Office ("SHPO") in the review and assessment of the survey results. If cultural resources are identified, NDPL will avoid or mitigate any impacts in accordance with SHPO recommendations.

14. NDPL will also complete wetland and biological field surveys along the re-routes, and will coordinate with the appropriate regulatory agencies for these resources as needed.

FURTHER AFFIANT SAYETH NOT.


Barry Simonson

Subscribed and sworn to before me
this 10th day of June, 2014.


Notary Public Corissa Seely
my commission expires: November 20, 2016



State of Wisconsin
Notary Public
CORISSA ZEEGLY