

December 9, 2014

VIA HAND DELIVERY

Mr. Patrick Fahn
North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-4080



**RE: Paradigm Midstream Services - ND, LLC,
Case No. PU-14-620 — Request for
Supplemental Information**

Dear Mr. Fahn:

This letter is in regard to Paradigm Midstream Services – ND, LLC’s (“Paradigm”) Application for a Certificate of Public Convenience and Necessity (“CPCN”) in the above-referenced matter. In its Application, Paradigm requested a CPCN for its Sacagawea Pipeline (the “Pipeline”). Paradigm plans to construct, own, and operate the Pipeline in McKenzie and Mountrail Counties, North Dakota. The Pipeline will consist of approximately 70 miles of pipeline and other facilities to be used for the transport of crude oil from an area near Johnson’s Corner in McKenzie County to Dakota Plains Holdings, Inc.’s Pioneer crude oil transloading facility located in New Town, North Dakota, in Mountrail County. The Pipeline will then extend from the Pioneer facility to Enbridge’s Stanley Station located in Stanley, North Dakota, in Mountrail County. There, the Pipeline will tie into Enbridge’s North Dakota pipeline and Sandpiper pipeline systems which connect to Enbridge’s Berthold Rail facility and additional pipeline capacity downstream of Berthold, North Dakota. Paradigm has requested a CPCN to ensure all proper authorization has been obtained before the siting process and construction of the Pipeline begin.

At the October 22, 2014 informal hearing, questions were raised by the Public Service Commission (“Commission”) which require supplemental information. The main issue raised by the Commission concerned the coverage area of the requested CPCN. As briefly discussed at the hearing, Paradigm requests that the CPCN be granted to cover ten (10) miles on either side of the proposed Pipeline route. Attached as Exhibit A is a map illustrating the area requested to be covered by the CPCN. Paradigm’s requested Public Convenience and Necessity (“PC&N”) area is indicated in purple.

Attorneys & Advisors
main 701.221.8700
fax 701.221.8750
www.fredlaw.com

Fredrikson & Byron, P.A.
1133 College Dr
Bismarck, North
58501-1215

20 PU-14-620 Filed: 12/9/2014 Pages: 3
Supplemental information to Application for CPCN

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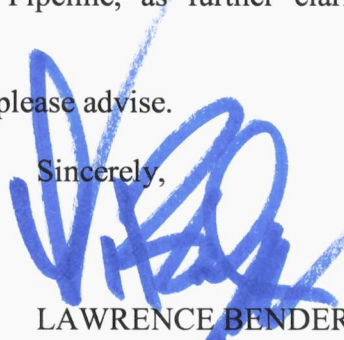
The second issue raised at the hearing was whether the PC&N area covered by another utility, BakkenLink Pipeline LLC (“BakkenLink”), granted by the Commission in September 2014 will overlap with the PC&N area requested by Paradigm. To avoid any overlap in coverage of the PC&N areas, Paradigm herein requests a CPCN for the portion of the Pipeline not covered by BakkenLink’s PC&N service area. As shown in Exhibit A, Paradigm requests its PC&N area extend to the edge of BakkenLink’s PC&N area. The PC&N areas can be easily distinguished on the map by the different colored PC&N areas. As such, no overlap will occur between BakkenLink’s PC&N area and Paradigm’s requested PC&N area.

The last issue raised by the Commission was the time period for which the CPCN would be valid if Paradigm was unable to obtain all of the necessary permits to move forward with the siting process in an expeditious manner. Paradigm appreciates the Commission’s concern, but has intents to move forward with the siting process as quickly as possible and does not anticipate any extended delays. As such, Paradigm requests that the CPCN be valid for one year from the date of issuance in the event the siting process is not proceeding forward. However, at such point that the siting process commences within the one year period, the CPCN will continue to remain in force and effect upon its normal terms, conditions, and duration.

Based on the testimony given at the informal hearing and the above information with corresponding exhibits, Paradigm respectfully requests the Commission grant the request to issue a CPCN for the proposed Sacagawea Pipeline, as further clarified herein, at its earliest convenience.

If you should have any questions, please advise.

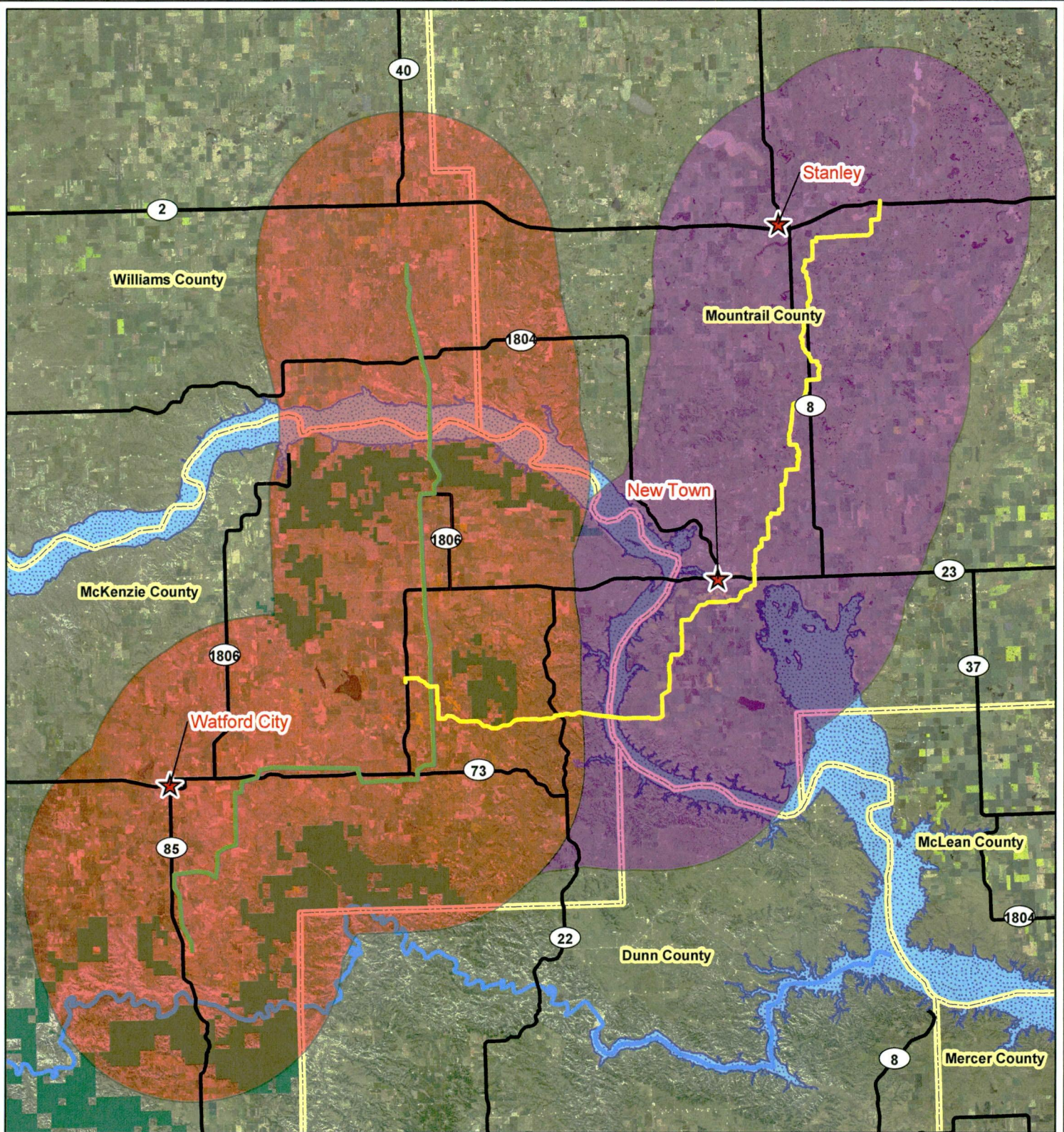
Sincerely,



LAWRENCE BENDER

LB/dmk
Enclosure

cc: Julie Prescott (*via e-mail*)
Jason Stelzer (*via e-mail*)



**Paradigm Midstream
PC & N**

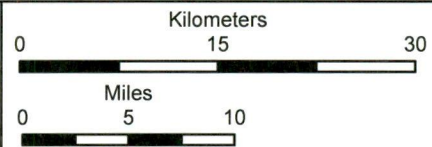
- ★ City
- Bakkenlink Pipeline
- Sacagawea Pipeline
- Little Missouri River
- State and Federal Roads
- 20-mile Bakkenlink Pipeline Service Area
- 20-mile Sacagawea Pipeline Service Area
- Lake Sakakawea
- Little Missouri National Grassland
- County Boundary

Exhibit A



116 North 4th Street
Suite 200
Bismarck, ND 58501
Phone: 701.258.6622
Fax: 701.258.5957

www.swca.com



Base Map: NAIP Aerial Imagery
Source: NDGIS HUB
McKenzie, Mountrail, and
Williams Counties,
North Dakota

NAD 1983 UTM Zone 13N

