

**LATE-FILED EXHIBIT NO. 9**

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

**Plains Pipeline, L.P.  
8-inch Crude Oil Pipeline – Bison Pipeline Project  
Siting Application**

**Case No. PU-15-035**

**AFFIDAVIT OF TUCKER GORDON**

STATE OF WYOMING                    )  
  ) ss.  
COUNTY OF LARAMIE                )

Tucker Gordon, being first duly sworn upon oath, states and alleges as follows:

1. I am a Project Engineer for Plains Pipeline, L.P. (“Plains”), which proposes to construct, own, and operate the Bison Pipeline Project (“Project”), the subject of the above-captioned matter.

2. I was advised as to perjury, placed under oath, and testified on behalf of Plains at the June 24, 2015 public hearing on Plains’s Application for a Certificate of Corridor Compatibility and Route Permit (“Application”) for the Project.

3. In this Affidavit, I understand that I am still under oath and I am providing sworn testimony as part of the public hearing record, as authorized by and on behalf of Plains.

4. At the June 24, 2015 public hearing on Plains’s Application, Plains requested that the North Dakota Public Service Commission (“Commission”) issue a Certificate of Corridor Compatibility and a Route Permit designating the Project corridor and route, as depicted in Hearing Exhibit No. 2.

5. During the public hearing on Plains’s Application, Plains was granted the opportunity to submit a late-filed exhibit discussing leak monitoring information and power source information in North Dakota.

6. Since 2006, Plains has had zero reportable incidents to report to the Pipeline and Hazardous Materials Safety Administration with regard to the pipelines and facilities that Plains or its affiliates owns and/or operates in North Dakota. Plains has precautions in place in the event such an incident should occur.

7. In addition to the leak detection and monitoring procedures discussed at the hearing, Plains also has additional safeguards in place to ensure leak detection and monitoring is continuous, even in the event of a loss of power.

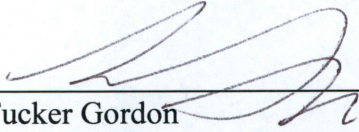
8. For example, all transmitters and meters are equipped with backup battery systems. If a power outage occurred, monitoring activities would continue while on the backup batteries.

9. The backup batteries are generally equipped to provide two (2) hours of power to equipment to allow continued monitoring until power is restored or until the equipment is shut down.

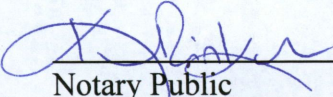
10. In the event of a power outage, field personnel are dispatched to the pipeline and facilities to shut down all equipment if necessary. Accordingly, two (2) hours of battery backup is more than sufficient to allow field personnel to shut down all equipment before a loss of battery backup power.

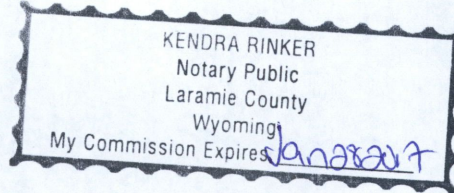
11. The implementation of battery backup and shut down procedures are in place to allow leak detection monitoring to continue at all times the pipeline and facilities are in operation and to ensure a complete loss of power to the system is unlikely to take place prior to all equipment being shut down by Plains personnel.

FURTHER AFFIANT SAYETH NOT.

  
Tucker Gordon

Subscribed and sworn to before me  
this 16 day of October, 2015.

  
Notary Public



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