

July 21, 2015

VIA HAND DELIVERY

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



**RE: Sacagawea Pipeline Company, LLC —
Case Number PU-15-114**

Dear Mr. Nitschke:

Enclosed for filing in the above referenced matter, please find an original and ten (10) copies of Sacagawea Pipeline Company, LLC's Motion to Amend Consolidated Application with respect to the Sacagawea Pipeline Project to be located in McKenzie and Mountrail Counties.

Also enclosed is a CD containing the Motion to Amend Consolidated Application in PDF format. If you should have any questions, please advise.

Sincerely,

A handwritten signature in blue ink, appearing to read "L. Bender".

LAWRENCE BENDER

LB/dmk
Enclosures

cc: Zack Pelham (via e-mail)
Julie Prescott (via e-mail)

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PU-15-114 Filed: 7/21/2015 Pages: 5
Motion to Amend Consolidated Application

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA

Sacagawea Pipeline Company, LLC
16-inch Crude Oil Pipeline – McKenzie & Mountrail
Siting Application

CASE NO. PU-15-114

Motion To Amend Consolidated Application

Sacagawea Pipeline Company, LLC (“Sacagawea”), hereby moves the North Dakota Public Service Commission (“Commission”) for leave to amend the consolidated application for a Certificate of Corridor Compatibility and Route Permit for a 16-inch crude oil pipeline, approximately 70 miles in length, known as the Sacagawea Pipeline Project to be located in McKenzie and Mountrail Counties, North Dakota (the “Project”) pursuant to North Dakota Administrative Code Section 69-02-02-07 and North Dakota Century Code Chapter 28-32. The amendment will consist of the Amendment of Application for Route Permit filed with the Commission on June 29, 2015. *See* Docket No. 15.

In support of its motion, Sacagawea states as follows:

1.

On March 16, 2015, Sacagawea filed a consolidated application for a Certificate of Corridor Compatibility and Route Permit (“Consolidated Application”) with the Commission for its proposed Project.

2.

On June 17, 2015, the Commission deemed the Consolidated Application complete and scheduled the matter for a hearing.

3.

Subsequent to the filing of the Consolidated Application, Sacagawea identified twenty-nine locations along the proposed route where alternative alignments were necessary.

4.

On June 29, 2015, Sacagawea provided to the Commission the Amendment of Application for Route Permit (“Amendment of Application”) which includes the necessary information regarding the alternative alignments. *See* Docket No. 15.

5.

The alternative alignments contained in the Amendment of Application are necessary for a number of reasons including but not limited to: 1) relocating the route to avoid or create a greater distance from exclusion or avoidance areas; 2) minimizing impacts to environmental features; 3) improving crossing alignments with existing foreign pipelines; 4) paralleling existing pipelines; 5) accommodating design changes; and 6) creating additional temporary workspace for construction. A more detailed discussion of the necessity for the reroutes is included in Section 2 of the Amendment of Application. *See* Docket No. 15.

6.

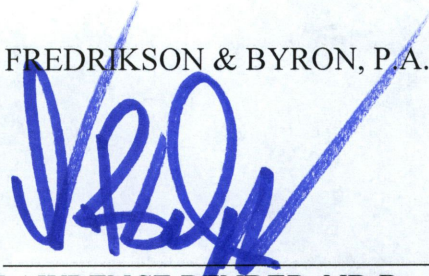
Of the twenty-nine route alterations, twenty closely follow the original alignment and remain within the original Survey Corridor. All necessary studies and surveys were completed for the nine route alternatives that fall outside the previous Survey Corridor and are included in the Amendment of Application.

WHEREFORE, Sacagawea respectfully requests that the Amendment of Application for Route Permit be accepted as an amendment to the original Consolidated Application and the

Commission consider such Amendment of Application in conjunction with the Consolidated Application in rendering an expeditious decision in this matter.

DATED this 21st day of July, 2015.

FREDRIKSON & BYRON, P.A.

A handwritten signature in blue ink, appearing to be 'L. Bender', is written over a horizontal line. The signature is stylized and slanted upwards to the right.

By

LAWRENCE BENDER, ND Bar #03908
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