

**LATE-FILED EXHIBIT NO. 16**

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

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

**Case No. PU-15-114**

**AFFIDAVIT OF TROY ANDREWS**

STATE OF TEXAS            )  
  ) ss.  
COUNTY OF DALLAS        )

Troy Andrews, being first duly sworn upon oath, states and alleges as follows:

1. I am CEO of Paradigm Energy Partners, LLC, with authority to bind and provide information on behalf of Sacagawea Pipeline Company, LLC (“Sacagawea”), which proposes to construct, own, and operate the Sacagawea Pipeline Project (“Project”), the subject of the above-captioned matter.

2. In this Affidavit, I understand that I am providing sworn testimony as part of the public hearing record, as authorized by and on behalf of Sacagawea.

3. At the August 21, 2015, public hearing on Sacagawea’s Application for a Certificate of Corridor Compatibility and Route Permit (“Application”) for the Project, Sacagawea 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. 3.

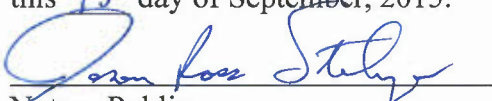
4. During the public hearing on Sacagawea’s Application, Sacagawea was asked by the Commission to consider adding an additional block valve between mile post 18 and mile post 24 to alleviate some of the spill concerns addressed at the hearing.

5. While the inclusion of the additional block valve between mile post 18 and mile post 24 will have no effect on a worst case spill, Sacagawea will commit to adding the additional block valve, so long as Sacagawea can obtain an agreement with a landowner to install the block valve on their property.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
Troy Andrews

Subscribed and sworn to before me  
this 15 day of September, 2015.

  
\_\_\_\_\_  
Notary Public

