

September 14, 2015

VIA FEDERAL EXPRESS

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



**RE: NST Express, LLC's Application for a Certificate of Corridor Compatibility and Route Permit, McKenzie County, North Dakota
Case No. PU-15-232**

Dear Mr. Nitschke:

Enclosed for filing in connection with the above-referenced matter are an original and ten (10) copies of the Motion to Amend Consolidated Application.

Electronic copies of the enclosed document and this letter were filed with the Commission today via e-mail. If you have any questions, please let me know.

Sincerely,

A handwritten signature in blue ink that reads "Mollie M. Smith".

MOLLIE M. SMITH

MMS/rg
Enclosure
56056848v3

cc: Erik Ludtke (via e-mail w/encl.)
Boe Gregson (via e-mail w/encl.)

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Motion to Amend Consolidated Application

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA

IN THE MATTER OF THE APPLICATION
OF NST EXPRESS, LLC, FOR A
CERTIFICATE OF CORRIDOR
COMPATIBILITY AND ROUTE PERMIT
FOR THE NST EXPRESS PIPELINE
PROJECT IN MCKENZIE COUNTY,
NORTH DAKOTA

CASE NO. PU-15-232

Motion to Amend Consolidated Application

Pursuant to North Dakota Administrative Code Sections 69-02-02-07(1) and 69-02-02-07.1 and North Dakota Century Code Chapter 28-32, NST Express, LLC (“NST Express”), hereby moves the North Dakota Public Service Commission (the “Commission”) for leave to amend the Consolidated Application for a Certificate of Corridor Compatibility and Route Permit (“Consolidated Application”) and associated Waiver Application for the NST Express Pipeline Project (“Project”) to be located in McKenzie County, North Dakota. The amendment consists of changes to the proposed Route and Corridor, which are supported by NST Express’s testimony and exhibits of NST Express presented at the public hearing on September 10, 2015.

In support of its motion, NST Express states as follows:

1. On May 29, 2015, NST Express filed its Consolidated Application with the Commission for the Project.
2. On July 8, 2015, the Commission deemed the Consolidated Application complete and scheduled the matter for a hearing.
3. Subsequent to the filing of the Consolidated Application, NST Express identified nine locations along the proposed route where alternative alignments (or, “re-routes”) were necessary. These alignments are set forth in Hearing Exhibit Nos. 2 and 3.

4. NST Express has incorporated the re-routes in response to landowner requests or with the landowners' approval.

5. Of the nine re-routes, three remain within the original corridor, and six fall outside that corridor. Environmental field surveys have been completed on all re-routes and updated survey reports are provided in Hearing Exhibit Nos. 8 and 9.

6. In addition, NST Express has identified additional temporary workspace that will be necessary to allow for sufficient workspace for bores at road crossings. This workspace falls slightly outside of the original corridor and is also shown on Hearing Exhibit Nos. 2 and 3. Environmental field surveys have been completed on this additional temporary workspace, and updated survey reports are provided in Hearing Exhibit Nos. 8 and 9.

7. No exclusion or avoidance areas are impacted by the re-routes or the corridor expansions, as set forth in the testimony of Boe Gregson, who will testify on behalf of NST Express at the September 10, 2015 public hearing.

8. The re-routes are described in more detail in the testimony of Stephen Guenther and Boe Gregson, who will testify on behalf of NST Express at the September 10, 2015 public hearing.

NST Express respectfully requests that the Commission grant the motion and consider the proposed amendments in conjunction with the Consolidated Application.

