



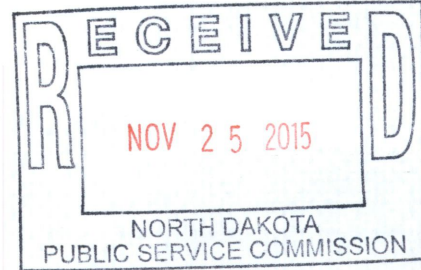
UTILITIES CO.

A Division of MDU Resources Group, Inc.

400 North Fourth Street
Bismarck, ND 58501
(701) 222-7900

November 25, 2015

Mr. Aaron Morman, Pipeline Safety Program Manager
ND Public Service Commission
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480



RE: Case No. GS-15-705

This letter will act as Montana-Dakota Utilities response to the Notice of Probable Violation (NOPV) issued in the above referenced case.

After reviewing the NOPV, documents supplied during the audit, and additional documents not presented at the time of the audit were examined and the following was discovered.

The records supplied during the inspection of August 11, 2015 indicate Valve #17 in Bowman ND was checked on May 6, 2014 and found to be inoperable due to a street project with asphalt surfacing being placed over the valve box. It is normal operations for all valve boxes, manholes, etc. to be uncovered and raised by the contractors completing the asphalt surfacing. When the Montana-Dakota crew returned from the Bowman area, a copy of the valve report, indicating Valve #17 to be inoperable, was supplied to the Operations team. The form was placed with the Sectionalizing Plan.

With Valve #17 still being designated as inoperable, December 31, 2014 a construction crew was sent to Bowman. Valve #17 was again checked and found to be inoperable as it was still covered with construction material. Again, a copy of the valve inspection was given to the operations team for inclusion in the Sectionalizing Plan.

Valve #17 was again checked in the spring, April 30, 2015. The Montana-Dakota crew found the valve in the same condition as the two previous visits. The Montana-Dakota crew removed the construction material from the valve box, raised the box to the grade of the road and operated the valve.

We feel the safety of the system in Bowman was not compromised when Valve #17 was checked and found to be inoperable. As discussed with you via email with Danny Hood, Montana-Dakota would have either dug a remote bell hole to squeeze off the line/place a line stopper fitting or used the next valve upstream to control the flow of gas if the issue would have required an immediate shut down.

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Response to Oct. 30, 2015 NOPV

Montana-Dakota Utilities Co., a Division of MDU Resources Group, Inc.
Pat Darras, VP of Operations

Montana-Dakota feels that by placing the inspection forms in the Sectionalizing Plan we were indicating the need to use an alternate means.

Montana-Dakota requests an opportunity to further discuss the NOPV and this response to that NOPV with you at your earliest convenience.

However, as required by 49 CFR §190.211, and as referenced in your letter dated October 30, 2015 Montana-Dakota further requests an informal hearing regarding this matter. The issue Montana-Dakota intends to raise at such hearing is that there were alternate means available of isolating the Bowman Distribution System if necessary.

Sincerely,

A handwritten signature in cursive script that reads "Pat Darras".

Pat Darras
Vice President of Operations
Montana-Dakota Utilities Co.