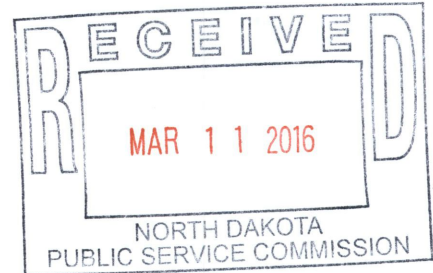


March 11, 2016

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-15-744**

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 Response to Petition to Intervene filed by the Laborers District Council of Minnesota and North Dakota ("Laborers Union"). A copy of the Response to Petition to Intervene has also been provided to the Laborers Union via United States mail.

Also enclosed is a CD containing the response to the Laborers Union's Petition to Intervene in PDF format. If you should have any questions, please advise.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence Bender", with a long, sweeping flourish extending to the right.

LAWRENCE BENDER

Enclosure

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

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Attorneys & Advisors
main 701.221.8700
fax 701.221.8750
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Fredrikson & Byron, P.A.
1133 College Dr
Bismarck, North
58501-1215

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Response to Petition to Intervene

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

Case No. PU-15-744

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

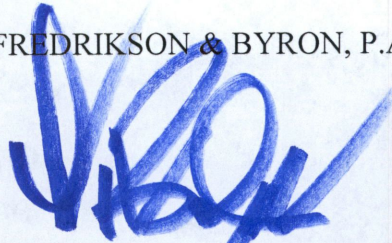
**RESPONSE TO PETITION TO
INTERVENE**

On January 29, 2016, the Laborers District Council of Minnesota and North Dakota (“Laborers Union”) filed a Petition to Intervene in the above-matter in connection with the Application of Sacagawea Pipeline Company, LLC (“Sacagawea”) for a Certificate of Corridor Compatibility and Route Permit for a 16-inch crude oil pipeline, approximately 15 miles in length, known as the Johnson’s Corner Connector Crude Oil Pipeline Project to be located in McKenzie County, North Dakota (the “Project”). *See* Docket No. 10. However, Sacagawea was not served with a copy of the Petition to Intervene as required by North Dakota Administrative Code § 69-02-02-05(3). *See* N.D.A.C. § 69-02-02-05(3) (“The petitioner will serve a copy of the petition on each party to the proceeding . . .”). Counsel for the North Dakota Public Service Commission notified Sacagawea of the Petition to Intervene on March 11, 2016.

The Laborers Union seeks intervention pursuant to North Dakota Administrative Code § 69-02-02-05 as a party to this action. As discussed in the Petition to Intervene, the Laborers Union seeks intervention in support of the Project proposed by Sacagawea. *See* Docket No. 10, at 2. At this time, the justification of the Laborers Union for intervention appears to align with the goals of Sacagawea and of the Project. Accordingly, Sacagawea has no objection to the intervention of the Laborers Union as a party to this action pursuant to North Dakota Administrative Code § 69-02-02-05, so long as the Laborers Union continues to support the Project.

DATED this 11th day of March, 2016.

FREDRIKSON & BYRON, P.A.

A handwritten signature in blue ink, appearing to be 'L. Bender', written over a horizontal line.

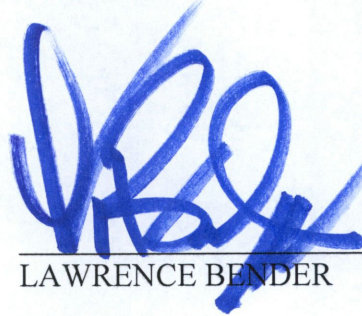
By

LAWRENCE BENDER, ND Bar #03908
DANIELLE M. KRAUSE, ND Bar #06874
Attorneys for Sacagawea Pipeline Company, LLC
1133 College Drive, Suite 1000
Bismarck, ND 58501
(701) 221-8700

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the foregoing document was on the 11th day of March, 2016 served by placing the same in the United States mail, postage prepaid, properly addressed to the following:

Mr. Todd Pufahl
Laborers District Council of Minnesota & North Dakota
81 East Little Canada Road
St. Paul, MN 55117



LAWRENCE BENDER

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