

# As-Built Inspection Report

12.75-Inch Crude Oil Pipeline - Williams County  
Epping Transmission Company, LLC

ND PSC Case No. PU-16-614

**Prepared for:**

North Dakota Public Service Commission  
Public Utilities Division  
State Capitol  
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## Executive Summary

The State of North Dakota, acting through its North Dakota Public Service Commission (Commission), Division of Public Utilities, has contracted Keitu Engineers & Consultants, Inc. (Keitu) to perform consulting services for an As-Built Siting Inspection. This report addresses the Orders established by the Commission and issues established in Case No. PU-16-614.

The 12.75-Inch Crude Oil Pipeline (Project) is located in Williams County, North Dakota. The Project will connect the Epping Station and the existing Divide Mainline Pipeline to the Dakota Access Pipeline Epping Facility. Construction for the Project began in March 2017 and was completed in August 2017. The purpose of the As-Built Inspection was to ensure the Project was constructed in compliance with the siting laws, rules, and the applicable Commission Order for the Project. Prior to the Construction Inspection, Keitu reviewed all Project documents to identify any and all aspects requiring site verification.

The site was visually inspected on July 25 and August 30, 2017 by Keitu staff. The Project was well-maintained, secured, and in good condition. During a Construction Inspection on March 30, 2017, a few areas were noted to have sediment runoff. During the As-Built Inspection, the areas appeared to have been properly restored. The Project will be inspected once again during the Reclamation and Revegetation Inspection. Overall, the Project appeared to be constructed as planned with numerous efforts to minimize impacts and to stay in compliance with the siting laws, siting rules, and Commission Orders.

## Introduction

The Project was approved and constructed in 2017 and is operated by Epping Transmission Company, LLC (Epping Transmission). The Project includes a 12.75 inch diameter crude oil pipeline totaling approximately 3.2 miles in length and two pipeline connections to the existing Divide Mainline and the new Dakota Access Pipeline valve site. The Project is under the jurisdiction of the North Dakota Public Service Commission (Commission), which issued its Order Amending Certificate and Permit for Case No. PU-16-614 on January 18, 2017.

## Purpose and Scope of Inspection

The North Dakota Energy Conversion and Transmission Facility Act (North Dakota Century Code Chapter 49-22) authorizes the Public Service Commission to determine that the location, construction, and operation of jurisdictional energy conversion and transmission facilities will produce minimal adverse effects on the environment and welfare of the citizens of North Dakota. Construction Inspections ensure the Project is constructed in compliance with siting laws, rules, and the applicable Commission Order Amending Certificate and Permit (Order).

The Commission retained Keitu Engineers & Consultants, Inc. (Keitu) to complete an As-Built Construction Inspection of the Project. The inspection process included a review of the Application for Amended Corridor Certificate and Route Permit (Application), Order, Certification Relating to Order Provisions (Certification), and other applicable documents to determine Project-specific siting and construction requirements; a site visit and inspection of facilities; documentation of compliance; and a report summarizing findings. This report includes, but is not limited to, site visit observations, documentation of compliance deficiencies, and a summary of issues that should be addressed for the Project to be considered complete and in full compliance.

## Methods

Keitu reviewed North Dakota siting laws and rules, the Application, Certification, and the Order for the Project to identify what Project-specific documentation was required for compliance. Keitu then reviewed Project documents in the PSC Online Case Search to identify those siting laws, rules, and Application and Order assertions that already had written verification, those that still required documentation, and those that required physical site verification.

Keitu Staff visited the Project area on July 25 and August 30, 2017 to visually inspect the site. Digital photographs were taken showing typical Project infrastructure and documenting any problem areas (starting page 16). The Project was in operation at the time of visit.

## Orders

The following section includes discussion of a list of components of the Project that were asserted in the Order which could be documented during the As-Built Inspection to verify compliance with siting laws, rules and the Order for the Project, via either written documentation or physical site verification. Included are detailed findings and observations from Keitu personnel involved in the As-Built Inspection for the Project.

**1. Epping Transmission Company, LLC’s application for a waiver of procedures and time schedules is granted.**

In a September 21, 2016 motion (Docket #6), Julie Prescott moved the Commission to deem the applications for a certificate of corridor compatibility and a route permit complete and issue a Notice of Filings and Public Hearing in the request of Epping Transmission Company, LLC, 12.75-inch Crude Oil Pipeline in Williams County, ND, Case No. PU-16-614.

Order #1 is complete.

**2. Certificate of Corridor Compatibility No. 196 is issued to Epping Transmission Company, LLC designation a corridor for the construction, operation and maintenance of approximately 3.2 miles of 12-inch diameter and 0.2 miles of 8-inch diameter pipeline and associated facilities for the transmission of crude oil in Williams County, North Dakota. For purposed of the Certificate, the designated corridor is depicted as “Environmental Survey Corridor” in Hearing Exhibit No. 12.**

On January 18, 2017 the Commission designated a transmission facility corridor for Epping Transmission Company, LLC approximately 3.2 miles of 12-inch diameter and 0.2 miles of 8-inch diameter pipeline and associated facilities in Williams County, North Dakota for the transmission of crude oil. The certificate (Docket #49), was issued in accordance with the Order of the Commission in Case No. PU-16-614 and was subject to the conditions and limitations noted in the Order. The “Environmental Survey Corridor” can be viewed in Docket #35.

Order #2 is complete.

**3. Route Permit No, 207 is issued to Epping Transmission Company, LLC designating a route for the construction, operation and maintenance of approximately 3.2 miles of 12-inch diameter and 0.2 miles of 8-inch pipeline and associated facilities for the transmission of crude oil in Williams County, North Dakota. For the purposes of the Permit, the designated route is depicted as “Proposed Alignment” in Hearing Exhibit No. 12.**

On January 18, 2017 the Commission designated a transmission facility route for Epping Transmission Company, LLC for the construction of approximately 3.2 miles of 12-inch diameter and 0.2 miles of 8-inch diameter pipeline and associated facilities in Williams County, North

Dakota. The permit (Docket #49) was issued in accordance with the Order of the Commission in Case No. PU-16-614 and was subject to the conditions and limitations noted in the Order. The “Proposed Alignment” can be viewed in Docket #35.

Order #3 was followed.

- 4. The December 1, 2016 Certification Relating to Order Provisions - Transmission Facility Siting (Certification), with accompanying Tree and Shrub Mitigation Specifications, is incorporated by reference and attached to this Order.**

Michael Smith of Epping Transmission Company, LLC signed the Certification Relating to Order Provisions – Transmission Facility Siting and accompanying Tree and Shrub Mitigation Specifications (Docket #36), binding Epping Transmission to requirements set forth by the Commission in its Order.

Order #4 was followed.

- 5. To the extent that there are any conflicts or inconsistencies between Epping Transmission Company, LLC’s applications in this proceeding and the Certification, as amended by paragraph 6 of this Order, the Certification provisions control.**

Order #5 was followed.

- 6. Provision 12 of the Certification is amended to state the following:  
Company understands and agrees that all topsoil, up to 12 inches, or topsoil to the depth of cultivation, whichever is greater, over and along trench areas where cuts will be made, must be carefully stripped and segregated from the subsoil. Any area on which excavated subsoil will be placed must also be stripped of topsoil. The stripped topsoil must not be stockpiled in natural drainages and must be protected from water erosion. Care must be taken to protect topsoil from unnecessary compaction by heavy machinery. If Company removes topsoil once topsoil freezes to the point that frost inhibits proper soil segregation, it shall follow the winter construction guidelines in the following documents: North Dakota State University Extensive Service, Publication R1728, “Successful Reclamation of Lands Disturbed by Oil and Gas Development and Infrastructure Construction,” August 2014; INGAA Foundation, Inc., Report No. 2013.04, “Planning Guidelines for Pipeline Construction During Frozen Conditions,” December 2013; and Late Filed Exhibit 16, Epping’s “LF16 Reclamation Plans for Winter Construction.”**

As stated in the Certificate of Corridor Compatibility Application, topsoil along the right-of-way was segregated, stored and replaced to actual depth (Docket #1). Epping Transmission committed to following applicable winter construction guidelines as given in the following documents: North Dakota State University Extensive Service, Publication R1728, “Successful Reclamation of Lands Disturbed by Oil and Gas Development and Infrastructure Construction,”

August 2014; INGAA Foundation, Inc., Report No. 2013.04, “Planning Guidelines for Pipeline Construction During Frozen Conditions,” December 2013; and Late Filed Exhibit 16, Epping’s “LF16 Reclamation Plans for Winter Construction” (Docket #40).

During the topsoil removal inspection on March 9, 2017, Epping Transmission performed the applicable winter construction guidelines in the above documents (Docket #58).

Order #6 was followed.

- 7. If a spill by Epping Transmission Company, LLC requires notification to any other state or federal agency, Epping Transmission Company, LLC will also inform the Commission of such spill within 24 hours of occurrence by leaving a message at the Commission’s Toll Free Number, with a follow-up email to the Commission’s Executive Secretary.**

A review of the project files did not indicate that there was a spill event by Epping Transmission during construction.

Order #7 was followed.

- 8. Epping Transmission Company, LLC is required to comply with all applicable laws, rules, and/or regulations in the event it desires to construct another or a different transmission facility than was specified in the application within the corridor granted in this proceeding.**

A review of the project files did not indicate that any other authorizations granted by the Certificate of Corridor Compatibility for a transmission facility desire to construct within the existing other than those originally included in the Route Permit or Site Certificate.

Order #8 was followed.

## Certification

The following section includes discussion of relevant items included in the Certification attached by reference to original Order (Docket #49 in Case No. PU-16-614). This Certification was also reviewed with Epping Transmission and a Commission representative during the preconstruction conference. All certifications points relevant to the As-Built Inspection Report are included.

- 1. Company understands and agrees that any Certificate of Corridor Compatibility or Route Permit issued by the Commission will be subject to the conditions and criteria set forth in Chapter 49-22 of the North Dakota Century Code and Chapter 69-06-08 of the North Dakota Administrative Code, and that Company shall be responsible for compliance with this order and conditions and criteria set forth in the applicable laws and rules.**

On January 18, 2017 the Commission designated a corridor for Epping Transmission Company, LLC, for the construction, operation and maintenance of the proposed pipeline and associated facilities in Williams County, ND. The certificate (Docket #49) was issued in accordance with the Order of the Commission dated January 18, 2017 in Case No. PU-16-614 and was subject to the conditions and limitations noted in the order.

Certification Point #1 was followed.

- 2. Company agrees to comply with the rules and regulations of all other agencies having jurisdiction over any phase of the transmission facility including all city, township and county zoning regulations.**

On August 25, 2016, Wade Mann provided the Commission with an Application for Waiver or Reduction of Procedures and Time Schedules & Certificate of Corridor Compatibility & Route Permit as prepared by E3 Environmental, LLC (Docket #1). Within the report, numerous State and Federal agencies including; but not limited to, State Historical Society of North Dakota, North Dakota Game and Fish Department, North Dakota State Water Commission, Williams County Water Resource Board and the U.S. Fish and Wildlife Service were contacted.

Certification Point #2 was followed.

- 4. Company understands and agrees that any Certificate of Corridor Compatibility or Route Permit issued by the Commission is subject to suspension or revocation and may, in an appropriate and proper case, be suspended or revoked for failure to comply with the Commission’s order, the conditions and criteria of the certificate or subsequent modification, or failure to comply with the applicable statutes, rules regulations, standards, and permits of other state or federal agencies.**

Company has complied with the applicable statutes, rules, regulations, standards, and permits of other state or federal agencies to date. The Company’s Certificate of Corridor Compatibility or Route Permit was not found to have been suspended or revoked for failure to comply with the Commission’s order.

Certification Point #4 was followed.

- 6. Company understands and agrees that the authorizations granted by any Certificate of Corridor Compatibility or Route Permit issued by the Commission for the transmission facility are subject to modification by order of the Commission if deemed necessary to protect further the public or the environment.**

Should the Commission deem necessary in the future to modify the corridor certificate and route permit it can do so if deemed necessary to further protect the public or the environment. No

modifications were made to the Certificate of Corridor Compatibility (No. 196) and Route Permit (No. 207).

Certification Point #6 was followed.

- 7. Company agrees to hold a preconstruction conference prior to commencement of any construction, which must include a Company representative, its construction supervisor, and a representative of Commission Staff, to ensure that Company fully understands the conditions set forth in the Commission’s order.**

A preconstruction meeting was held on March 2, 2017 via conference call (Docket #57). The following personnel were included: Megan Davis (Epping Transmission), Brian Raber (Epping Transmission), Erica Frisbie (Epping Transmission), Dean Blikre (Epping Transmission), Jaimee Antognazzi (Keitu Engineering), Karine Finken (Keitu Engineering), and Sara Cardwell (Commission).

The conference included a review of the Certification Relating to Order Provisions – Transmission Facility Siting and Tree and Shrub Mitigation Specifications, requirement to file its most recent PHMSA O&M audit, monthly construction updates, Certification 12 was revised related to winter conditions, landowner notification and who they contact for complaints.

Certification Point #7 was followed.

- 8. Company understands and agrees that all cultural resource mitigation plans must be submitted to the North Dakota State Historic Preservation Office and approved prior to the start of any fieldwork and construction activity in the affected area.**

E3 Environmental, LLC (E3 Environmental) performed a Class I and Class III cultural resource inventory for the proposed Project in Williams County. In June 2016, the Class I identified ten previously completed cultural resources surveys within one-half mile of the proposed pipeline. The Class III inventory, conducted in June 2016, identified two previously recorded prehistoric sites (32W11169 and 32W11678) and one previously recorded historic site (32W182) within the survey corridor. E3 Environmental conducted another Class III inventory in August 2016 on 1.04 acres of additional workspace. The conclusions are that construction activity within the survey corridor will not affect any know cultural resources (Docket #27).

The North Dakota State Historic Preservation Office (ND SHPO) reviewed the NDSHPO REF.: 13-1335A ND PSC “Epping Transmission Company, LLC Addendum to the 12.75-Inch Crude Oil Pipeline Project Class I and Class III Cultural Resources Inventory Williams County, North Dakota” on October 3, 2016 (Docket #29). The ND SHPO concurred there has been acceptable effort to identify and avoid impacts to “Significant Sites,” provided the project remains as described and mapped in the report dated September 2016 (Docket #27).

Certification Point #8 was followed.

9. **Company understands and agrees that topsoil removal will begin when the Commission’s third-party construction inspector is present at the Project site to observe that topsoil is properly removed and kept segregated from subsoil until replacement occurs. Company shall establish the date and time for the Commission’s third-party construction inspector’s topsoil removal oversight in the preconstruction conference.**

Epping Transmission was to have the Commission’s third party construction inspector onsite before topsoil removal could begin. A topsoil inspection report (Docket #58) filed with the Commission on March 22, 2017 indicated that Keitu was onsite for the start of topsoil removal to ensure topsoil is properly removed and segregated from subsoil while construction activities are taking place.

Certification Point #9 was followed.

10. **Company agrees to inform the Commission and the Commission’s third-party construction inspector of its intent to start construction on the transmission facility prior to the commencement of construction. Once construction has started, Company shall keep the Commission and the Commission’s third-party construction inspector updated on construction activities on a monthly basis.**

Epping Transmission filed with the Commission on August 25, 2016 for the operation of a 12.75 inch diameter crude oil pipeline approximately 3.2 miles in length and associated facilities (Docket #1). The Commission issued a Certificate of Corridor Compatibility No. 196 and Route Permit No. 207 to Epping Transmission on January 18, 2017 (Docket #49).

During the preconstruction meeting on March 2, 2017, Epping Transmission indicated they would provide several business days’ notice of the start of construction to both the third-party inspector and the Commission (Docket #57). Monthly updates were also provided to the Commission which can be viewed on the ND PSC website (Dockets #'s 59, 66).

Certification Point #10 was followed.

11. **Company understands and agrees that the pipeline will be buried to a minimum depth from the ground surface to the top of the pipe of 48 inches in range land, 48 inches for cultivated land, 48 inches at the bottom of the ditch for road crossings, and 72 inches across undeveloped section lines.**

On March 30, 2017 Keitu personnel observed the trench depths to be at the specified depth or greater (Docket # 60). The Project did not cross undeveloped section lines.

No exposed piping existed along the route or at road crossings during the As-Built construction inspection on July 25, 2017. Potholing to find the exact depth of the pipe was not performed during the As-Built inspection.

Certification Point #11 was followed.

**12. Company understands and agrees that all topsoil, up to 12 inches, or topsoil to the depth of cultivation, whichever is greater, over and along trench areas where cuts will be made, must be carefully stripped and segregated from the subsoil. Any area on which excavated subsoil will be placed must also be stripped of topsoil. The stripped topsoil must not be stockpiled in natural drainages and must be protected from water erosion. Care must be taken to protect topsoil from unnecessary compaction by heavy machinery. Unless otherwise approved by the Commission, topsoil must be removed before topsoil freezes in the late fall/early winter to the point that frost inhibits proper soil segregation. After backfilling with subsoil is completed, any excess subsoil must be placed other the excavation area, blending the grade into existing topography. Topsoil must be replaced over areas from which it was stripped only after the subsoil is replaced.**

In Docket #49, Certification relating to order Provisions Transmission Facility Siting, Company has agreed to the above statement and verification has been documented in both the topsoil inspection and construction inspection reports (Dockets #58, #60).

Certification Point #12 was followed.

**13. Company understands and agrees that all buried facility crossings of graded roads must be bored unless the responsible governing agency specifically permits Company to open cut the road.**

From the As-Built construction inspection, it appeared that all road crossings were bored. The roads over the pipe crossings appeared undisturbed and to grade.

Certification Point #13 was followed.

**14. Company understands and agrees that staging areas or equipment shall not be located on land owned by a person other than Company unless otherwise negotiated with landowners.**

During the construction inspection the Company was using the existing Epping Station as a staging area for the equipment. Keitu personnel did not observe any other staging areas.

Certification Point #14 was followed.

**15. Company understands and agrees that if any cultural resource, paleontological site, archeological site, historical site, or grave site is discovered during construction, it must be marked, preserved and protected from further disturbances until a professional examination can be made and a report of such examination is filled with the Commission and the State Historical Society.**

E3 Environmental performed a Class I and Class III cultural resource inventory for the proposed project. The conclusions are that construction activity within the survey corridor will not affect any know cultural resources (Docket #27). The ND SHPO agreed with the conclusions from E3 Environmental provided the project remains as described and mapped in the report dated September 2016 (Docket #27).

No cultural resource, paleontological site, archeological site, historical site, or grave site was discovered during construction. This is based on review of the monthly construction progress reports and verification that no correspondence was identified in the Commission’s file.

Certification Point #15 was followed.

**18. Company understands and agrees that it shall, as soon as practicable upon the completion of the construction of the transmission facility, restore the area affected by the activities to as near as is practicable to the condition as it existed prior to the beginning of construction.**

Epping Transmission stated in the Route Permit Application (Docket #1) that all impacted land will be restored to pre-construction conditions and revegetated.

Keitu will conduct a reclamation and revegetation inspection after one year after the final seeding of the site.

Certification Point #18 is anticipated to be complete after the final inspection.

**19. Company understands and agrees that all pre-existing township and county roads and lanes used during construction must be repaired or restored to a condition that is equal to or better than the condition prior to the construction of the transmission facility and that will accommodate their previous use, and that areas used as temporary roads or working areas during construction must be restored to their original condition.**

Existing roads and trails were to be left in a comparable or better conditions than what existed before construction. During the site visit on July 25, 2017, no access roads to the pipeline were noted. An access road to the above ground valve station appeared to be well maintained. No existing roads were noted to be in unfavorable condition.

Certification Point #19 was followed.

**22. Company will repair all fences and gates removed or damaged during all phases of construction and operation of the transmission facility.**

During the as-built construction inspection on July 25, 2017, all fences and gates were in good condition along the pipeline corridor.

Certification Point #22 was followed.

**23. Company will repair or replace all drainage tile broken or damaged as a result of construction and operation of the transmission facility.**

Landowners were contacted about the pipeline prior to the pipeline installation and there is no documentation in the Commission’s files of a drainage tile encounter.

Certification Point #23 was followed.

**24. Company agrees to comply with the Tree and Shrub Mitigation Specifications.**

During the preconstruction meeting it was stated that no trees or shrubs will be removed (Docket #57). During the construction inspection on March 30, 2017, Keitu personnel did not observe any evidence of tree or shrub removal.

Certification Point #24 was followed.

**25. Company understands and agrees that it shall remove all waste that is a product of construction and operation, restoration, and maintenance of the site, and properly dispose of it on a regular basis.**

From the as-built construction inspection, pipeline route was free of construction debris.

Certification Point #25 was followed.

**26. Company understands and agrees that it shall provide any necessary safety measures for traffic control or to restrict public access to the transmission facility.**

During the construction inspection Keitu personnel observed traffic control signs on site and at road crossings. Based on the as-built inspection, Epping Transmission restricts public access to the facility. Signs and a chain-link fence surround the main facilities and above ground valve station.

Certification Point #26 was followed.

**27. Company understands and agrees that, prior to beginning construction of the transmission facility at a location, it shall send a letter to each landowner with whom an easement was executed for that location specifying the name and phone number of the company representative who is responsible for receiving and resolving landowners issues for the life of the easement.**

All the landowner waivers are located in Appendix F in the Certificate of Corridor Compatibility Application (Docket #1). Nathan Brady with Bison Midstream, LLC will be the contact for receiving and resolving landowners’ issues for the life of the easement.

Certification Point #27 was followed.

**28. Company understands and agrees that it will file with the Commission the name and phone number of the current company representative who is responsible for receiving and resolving landowner issues for the transmission facility. The company will update this information whenever there is a change to the current company representative for the life of all easements for the transmission facility.**

During the preconstruction meeting Sara Cardwell (Commission) indicated that the company representative who is responsible for receiving and resolving landowner issues must appear in the minutes. Nathan Brady will be the contact for the landowners.

Certification Point #28 was followed.

**29. Upon request, Company agrees to provide the Commission with engineering design drawings of the transmission facility prior to construction.**

Construction plans and engineering drawings were supplied to the Commission in the Consolidated Application for Corridor Compatibility and Route Permit in Appendix A (Docket #1).

Certification Point #29 was followed.

**30. Company understands and agrees that it shall advise the Commission as soon as reasonably possible of any extraordinary events which take place at the site of the transmission facility, including injuries to any person.**

A review of the Commission’s files indicate no extraordinary events too place on site to date.

Certification Point #30 was followed; however the Commission has the option of requesting the documentation from the Company.

**31. Company agrees to report to the Commission, as soon as reasonable possible, the presence in the permit area of any critical habitat or threatened or endangered species**

**of which Company becomes aware and which were not previously reported to the Commission.**

No critical habitat or threatened or endangered species were discovered during construction.

Certification Point #31 was followed.

**32. Company understands and agrees that it shall inform the Commission in writing of any plans to modify the transmission facility or of any plans to modify the site plan for the transmission facility.**

The Company did not request any modifications to the Project.

Certification Point #32 was followed.

**34. Company shall notify the Commission as soon as reasonably possible if any damage, as defined by North Dakota Century Code Chapter 49-23, occurs to underground facilities during construction conducted under the certificate or route permit issued in this proceeding. In the event of any damage to underground facilities, Company shall suspend construction in the vicinity of the damage until compliance with One-Call Excavation Notice System requirements under North Dakota Century Code Chapter 49-23 has been determined.**

Based on the Commission's project files, there is no documentation that damage occurred to underground facilities during construction.

Certification Point #34 was followed.

**35. Company agrees to utilize the following procedures if Company seeks a route adjustment before or during construction of the pipeline, pursuant under N.D.C.C. §49-22-16.3.**

No route adjustments were made during construction of the pipeline.

Certification Point #35 was followed.

## Conclusions of Law

The following section includes discussion of relevant items included in the Conclusions of Law by reference to original Order (Docket #49 in Case No. PU-16-614). This was also reviewed with Epping Transmission and a Commission representative during the preconstruction conference.

**9. Epping will file a copy of its most recent operations and maintenance audit results prepared by the Pipeline and Hazardous Materials Administration, once finalized.**

During the preconstruction meeting on March 2, 2017, Sara Cardwell reminded the Company to file its most recent operations and maintenance audit prepared by the Pipeline and Hazardous Materials Administration (PHMSA O&M). Epping Transmission stated they would file a copy of its most recent PHMSA O&M audit, once finalized.

To this date, the PHMSA O&M has not been filed on the Commission’s website.

## Conclusions

Overall, the Project appeared to be constructed as designed with minimal impacts to the surrounding environment. The Project site was in good condition, well maintained, and appeared to be constructed in compliance with the siting laws, siting rules, and applicable Commission Orders. Conclusion of Law #9 will be considered complete once the required documents are finalized and filed with the Commission.

## Management Review

The services performed by Keitu and its staff for this project have been conducted in a manner consistent with the degree of care and technical skill appropriately exercised by professionals currently practicing in this area under similar time and budget constraints.

Recommendations and findings contained in this report represent our professional judgment and are based upon available information and technically accepted practices at the present time and location. Other than this, no warranty is implied or expressed.

9/6/17

Jaimee Antognazzi, Operations Manager

Date

**Report Photo #1: Typical ROW Conditions**



**Report Photo #2: ROW Leaving DAPL's Epping Terminal**



**Report Photo #3: Valve Site**



**Project Map:**

