

July 18, 2017

VIA HAND DELIVERY

Mr. Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-4080

**RE: QEP Field Services, LLC – Siting
Exclusion Certification - PU-17-_____**

Dear Mr. Nitschke:

Enclosed for filing, please find an original and ten (10) copies of the following documents in support of QEP Field Services, LLC's Siting Exclusion Certification:

1. Letter from Tesoro on behalf of QEP Field Services, LLC regarding Siting Exclusion Certification Compliance; and
2. Certification of Applicant Pursuant to North Dakota Century Code § 49-22.1-01(3).

Also enclosed is a CD containing the above-referenced documents in PDF format.

If you should have any questions, please advise.

Sincerely,


DANIELLE M. KRAUSE

DMK/ber
Enclosures

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PU-17-285 Filed: 7/18/2017 Pages: 7
**Certification and documentation relating to N.D.C.C.
Section 49-22.1-01(3)**

QEP Field Services, LLC

Danielle Krause, Fredrikson & Byron, P.A



Tesoro Logistics GP, LLC
19100 Ridgewood Parkway
San Antonio, TX 78259
210 626 6000

July 17, 2017

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

**RE: QEP Field Services, LLC – Siting Exclusion
Certification – PU-17-_____**

Dear Mr. Nitschke:

In accordance with North Dakota Century Code Section 49-22.1-01(3), this letter is provided to notify the North Dakota Public Service Commission (“Commission”) that QEP Field Services, LLC (“QEP”), a wholly owned subsidiary of Tesoro Companies, Inc. (“Tesoro”), intends to increase the capacity of the Robinson Lake Gas Plant (“Plant”) in Mountrail County, North Dakota. The Commission issued a Certificate of Site Compatibility for the Plant to Whiting Oil and Gas Corporation in Case No. PU-13-835 in May of 2014. First Reissued Certificate of Site Compatibility Number 38 was issued to QEP in Case No. PU-17-117 on June 30, 2017.

The increase of capacity for the Robinson Lake Gas Plant, an existing energy conversion facility, is necessary to meet increased regional demand for additional gas processing capacity in the area. Work associated with the increase in capacity for the Plant will include the addition of inlet compression, the expansion of the water removal process, and modification of the process and refrigeration systems.

In accordance with N.D.C.C. § 49-22.1-01(3)(a), QEP states as follows:

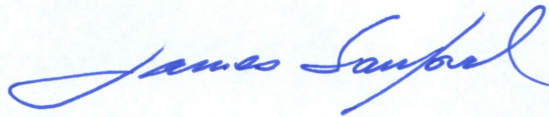
- (1) All construction activities associated with the increase in capacity for the Plant will be within the 35-acre project site designated in First Reissued Certificate of Site Compatibility No. 38.
- (2) An environmental analysis, conducted in connection with the original Application submitted to the Commission for the Robinson Lake Gas Plant, evaluated the project site for Exclusion and Avoidance Areas as set forth in N.D. Admin. Code § 69-06-08-01.

The increase in pressure for the Plant will not affect any known Exclusion or Avoidance Areas.

- (3) The activities to be conducted are for the increase of capacity of the existing gas energy conversion facility.
- (4) The attached Certification provides the information required by N.D.C.C. § 49-22.1-01(3)(a)(4). As set forth in the Certification, QEP will comply with all applicable conditions and protections in siting laws and rules and Commission orders previously issued for the Robinson Lake Gas Plant.

Tesoro requests the Commission acknowledge receipt of the attached Certification and appreciates the time and attention provided to this matter by the Commission and staff. If you have any questions, please do not hesitate to contact Tesoro.

Sincerely,



James Sanford, Director
Right of Way & Real Estate
Tesoro Companies, Inc.

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

QEP Field Services, LLC
Robinson Lake Gas Plant Expansion – Mountrail County
Siting Exclusion Certification

Case No. PU-17-__

CERTIFICATION OF APPLICANT PURSUANT TO
NORTH DAKOTA CENTURY CODE § 49-22.1-01(3)

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

James Sanford, being first duly sworn upon oath, states and alleges as follows:

1. I am James Sanford, Director, Right of Way & Real Estate for Tesoro Companies, Inc., and I am familiar with the Robinson Lake Gas Plant (“Plant”) that is the subject of Case No. PU-13-835 and First Reissued Certificate of Site Compatibility Number 38 issued in Case No. PU-17-117 for the Plant. I am also familiar with the planned facility modification that is the subject of this Certification, and have the authority to bind QEP Field Services, LLC (“QEP”) with respect to the certifications made herein.

2. I provide this Certification in support of QEP’s plans to increase the capacity of the Plant, an existing gas energy conversion facility, pursuant to North Dakota Century Code (“N.D.C.C.”) § 49-22.1-01(3)(a).

3. On October 11, 2013, Whiting Oil and Gas Corporation (“Whiting”) filed with the North Dakota Public Service Commission (“Commission”) an application for a certificate of site compatibility for the Plant, which included an existing 97.5 million standard cubic feet per day (“MMSCFD”) Plant and an expansion of the Plant to 110 MMSCFD.

4. The location for which the site certificate was requested included a 35-acre plot of land owned by Whiting located in the NW/4 of Section 23, Township 153 North, Range 91 West, Mountrail County, North Dakota (“Project Site”).

5. On May 28, 2014, the Commission entered its Findings of Fact, Conclusions of Law and Order (“Order”) issuing Certificate of Site Compatibility Number 38 for the Plant to Whiting, allowing the Plant to be operated at 110 MMSCFD. *See* Case No. PU-13-835, Docket No. 38.

6. On January 1, 2017, Whiting and QEP entered into an agreement for the purchase of certain gas processing and gathering facilities located in Mountrail County, North Dakota, including the Robinson Lake Gas Plant.

7. On March 29, 2017, Whiting and QEP submitted a joint application to the Commission for the transfer of Certificate of Site Compatibility No. 38 from Whiting to QEP. *See* Case No. PU-17-117, Docket No. 1.

8. On June 30, 2017, the Commission granted the transfer of Certificate of Site Compatibility No. 38 from Whiting to QEP, and issued First Reissued Certificate of Site Compatibility No. 38 to QEP. *See* Case No. PU-17-117, Docket No. 14.

9. Upon acquiring the Plant, QEP reviewed the Plant under applicable management of change (“MOC”) procedures to ensure the Plant meets all safety, environmental, and other applicable standards.

10. As noted in the Order issued by the Commission in 2014, further expansion of the Plant was anticipated and such increase of capacity could be “as much as 175 MMSCFD” and accomplished “by adding an additional refrigeration unit, up to six additional inlet/residue compressors, and related equipment.” *See* Case No. PU-13-835, Docket No. 38 at 3. The

anticipated activities and increase of capacity “would not change the purpose or function of the Plant and would all occur within the Project Site.” *See id.*

11. Through the MOC process, QEP has confirmed the Plant has the ability to safely operate at a higher capacity, as previously determined by Whiting. Accordingly, QEP desires to increase the capacity of the Plant to 150 MMSCFD.

12. In accordance with N.D.C.C. § 49-22.1-01(3)(a)(3)(d), QEP intends to increase the capacity of the existing gas energy conversion facility to 150 MMSCFD to meet increased regional demand for additional gas processing capacity.

13. The Order specifically provided “further expansion of the Plant which consists of construction activities conducted within the boundaries of the Project Site and which do not affect any known exclusion or avoidance areas do not constitute ‘construction’ requiring an additional or amended certificate of site compatibility if [the company] certifies certain matters to the Commission in accordance with section [49-22.1-01(3)(a)(3)].”¹ *See* Case No. PU-13-835, Docket No. 38 at 5.

14. All activities associated with the expansion and increase of capacity for the Plant will occur within the 35-acre Project Site designated for the Plant. *See* N.D.C.C. § 49-22.1-01(3)(a)(1)(a). Work associated with the increase in capacity for the Plant will include the addition of inlet compression, the expansion of the water removal process, and modification of the process and refrigeration systems.

15. In conjunction with the Application for a Certificate of Site Compatibility submitted to the Commission for the Plant, the necessary field studies were conducted to confirm

¹ The applicable siting exclusion language previously found in N.D.C.C. § 49-22-03(3)(a)(3) referenced in the Order is now found in N.D.C.C. § 49-22.1-01(3)(a)(3).

the presence or absence of exclusion and avoidance areas within the Project Site. The activities associated with increasing the Plant capacity will not affect any known exclusion or avoidance areas. See N.D.C.C. § 49-22.1-01(3)(a)(2).

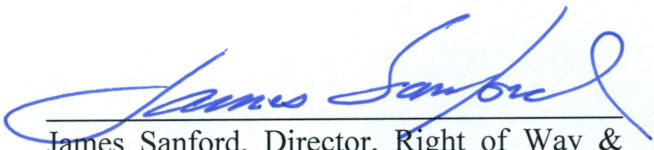
In accordance with N.D.C.C. § 49-22.1-01(3)(a)(4), QEP certifies as follows:

16. As noted in paragraph 15, above, the activities associated with increasing the Plant capacity will not affect any known exclusion or avoidance areas. See N.D.C.C. § 49-22.1-01(3)(a)(4)(a); see also Case No. PU-13-835, Docket No. 1.

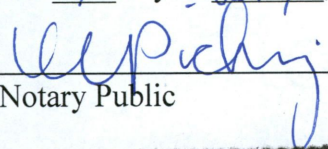
17. The activities are for construction to increase the capacity of the existing gas energy conversion facility. See N.D.C.C. § 49-22.1-01(3)(a)(4)(b)(4).

18. QEP will comply with all applicable conditions and protections in siting laws and rules and Commission orders previously issued for any part of the facility. See N.D.C.C. § 49-22.1-01(3)(a)(4)(c).

FURTHER AFFIANT SAYETH NOT.


James Sanford, Director, Right of Way &
Real Estate, Tesoro Companies, Inc. on
behalf of QEP Field Services, LLC

Subscribed and sworn to before me
this 17th day of July, 2017.


Notary Public

