



Timothy J. Dawson  
DIRECTOR

## OFFICE OF ADMINISTRATIVE HEARINGS

STATE OF NORTH DAKOTA

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Bismarck, North Dakota 58503

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oah@nd.gov  
www.nd.gov/oah

October 24, 2018

John Hamre  
Public Service Commission  
600 East Boulevard Avenue – Dept. 408  
Bismarck, ND 58505-0480

RE: Hiland Partners Holdings, LLC / PU-18-277  
OAH File No. 20180395

Dear Mr. Hamre:

Enclosed are the late-filed exhibits for the Hiland Partners Holdings, LLC / Roosevelt Gas Plant Expansion Project / PU-18-277 public hearing held on September 27, 2018. Exhibits 6 through 17 are late-filed. Exhibit 5 was provided at the hearing and is enclosed as well.

Sincerely,

Timothy J. Dawson  
Administrative Law Judge

Enclosures

Cc: Lawrence Bender, counsel for ONEOK Rockies Midstream, LLC  
Sarah Wall, Special Assistant Attorney General

**Late Filed Exhibit 5: Health Department Letter 9-9-2018**



September 6, 2018

ND Public Service Commission  
600 East Boulevard Avenue, Dept. 608  
Bismarck, ND 58505-0480

Re: Roosevelt Gas Plant Expansion Project  
Case No. PU-18-277  
McKenzie County

Dear Commissioners:

This department has reviewed the information concerning the above-referenced project submitted under date of August 22, 2018, with respect to possible environmental impacts.

This department believes that environmental impacts from the proposed construction will be minor and can be controlled by proper construction methods. With respect to construction, we have the following comments:

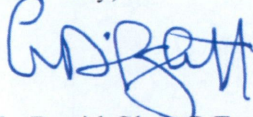
1. Care is to be taken during construction activity near any water of the state to minimize adverse effects on a water body. This includes minimal disturbance of stream beds and banks to prevent excess siltation, and the replacement and revegetation of any disturbed area as soon as possible after work has been completed. Caution must also be taken to prevent spills of oil and grease that may reach the receiving water from equipment maintenance, and/or the handling of fuels on the site. Guidelines for minimizing degradation to waterways during construction are attached.
2. Projects disturbing one or more acres are required to have a permit to discharge storm water runoff until the site is stabilized by the reestablishment of vegetation or other permanent cover. Further information on the storm water permit may be obtained from the Department's website or by calling the Division of Water Quality (701-328-5210). Also, cities may impose additional requirements and/or specific best management practices for construction affecting their storm drainage system. Check with the local officials to be sure any local storm water management considerations are addressed.
3. Although the proposed construction project does not overlie a defined glacial drift aquifer, several domestic and stock water supply wells are located in the vicinity of the proposed project. Care should be taken to avoid spills of any materials that may have an adverse effect on groundwater quality. All spills must be immediately reported to this Department and appropriate remedial actions performed.

4. The proposed project appears to have the potential to be a source of emissions to the air capable of causing or contributing to air pollution and may be required to have an Air Pollution Control Permit to Construct/Operate as required by Chapter 33-15-14 of the North Dakota Air Pollution Control Rules. The applicant should contact the Department's Air Pollution Control Program at 701-328-5188 prior to commencing construction.
5. Projects that involve construction of pipelines should select locations that minimize the potential for impacts to human health and the environment during and after construction by avoiding, when possible, source water protection areas and sensitive surface and groundwater environments. Additionally, when possible, pipeline routes should select areas with natural barriers to both surface and ground waters. Human health and the environment should be further protected by developing a spill response plan that emphasizes rapid deployment of prepositioned assets necessary to contain spills and subsequent cleanup. Proper surveillance and monitoring for early detection of leaks should be required.

The department owns no land in or adjacent to the proposed improvements, nor does it have any projects scheduled in the area. In addition, we believe the proposed activities are consistent with the State Implementation Plan for the Control of Air Pollution for the State of North Dakota.

If you have any questions regarding our comments, please feel free to contact this office.

Sincerely,



L. David Glatt, P.E., Chief  
Environmental Health Section

LDG:cc  
Attach.



## **Construction and Environmental Disturbance Requirements**

These represent the minimum requirements of the North Dakota Department of Health. They ensure that minimal environmental degradation occurs as a result of construction or related work which has the potential to affect the waters of the State of North Dakota. All projects will be designed and implemented to restrict the losses or disturbances of soil, vegetative cover, and pollutants (chemical or biological) from a site.

### **Soils**

Prevent the erosion of exposed soil surfaces and trapping sediments being transported. Examples include, but are not restricted to, sediment dams or berms, diversion dikes, hay bales as erosion checks, riprap, mesh or burlap blankets to hold soil during construction, and immediately establishing vegetative cover on disturbed areas after construction is completed. Fragile and sensitive areas such as wetlands, riparian zones, delicate flora, or land resources will be protected against compaction, vegetation loss, and unnecessary damage.

### **Surface Waters**

All construction which directly or indirectly impacts aquatic systems will be managed to minimize impacts. All attempts will be made to prevent the contamination of water at construction sites from fuel spillage, lubricants, and chemicals, by following safe storage and handling procedures. Stream bank and stream bed disturbances will be controlled to minimize and/or prevent silt movement, nutrient upsurges, plant dislocation, and any physical, chemical, or biological disruption. The use of pesticides or herbicides in or near these systems is forbidden without approval from this Department.

### **Fill Material**

Any fill material placed below the high water mark must be free of top soils, decomposable materials, and persistent synthetic organic compounds (in toxic concentrations). This includes, but is not limited to, asphalt, tires, treated lumber, and construction debris. The Department may require testing of fill materials. All temporary fills must be removed. Debris and solid wastes will be removed from the site and the impacted areas restored as nearly as possible to the original condition.

**Late Filed Exhibit 6: Plot Plan (Revised)**

EQUIPMENT LEGEND

- ① V-1000 SLUG CATCHER
- ② F-1001 A/B CONDENSATE FILTERS
- ③ V-1050 INLET GAS SEPARATOR
- ④ E-1100 PRELINE LIQUIDS HEATER
- ⑤ C-1300/1400 RESIDUE GAS COMPRESSORS
- ⑥ H-1300/1400 RESIDUE COMPRESSOR COOLERS
- ⑦ F-1500 RESIDUE GAS FILTER COALESCER
- ⑧ F-1530 SEAL GAS FILTER
- ⑨ E-1750 INLET GAS PREHEATER
- ⑩ V-4050 CONDENSATE SURGE TANK
- ⑪ F-3000 CONDENSATE WATER COALESCER
- ⑫ STABILIZER SKID
- ⑬ V-403 COLD DRAIN TANK
- ⑭ P-1800/1700 CRYO NGL PIPELINE PUMPS
- ⑮ V-2100 STABILIZER NGL SURGE TANK
- ⑯ P-2150A/B STABILIZER NGL BOOSTER PUMP
- ⑰ P-2180/2170 STABILIZER NGL PIPELINE PUMP
- ⑱ C-8000/9400 STABILIZER OVERHEAD COMPRESSOR
- ⑲ H-1,800/9400 STABILIZER OVERHEAD COMPRESSOR COOLER
- ⑳ AC-1750 NGL PRODUCT COOLER
- ㉑ C-4001A/B INSTRUMENT AIR COMPRESSOR PACKAGE
- ㉒ V-4010 INSTRUMENT AIR RECEIVER
- ㉓ V-5000 FLARE KNOCKOUT DRUM
- ㉔ F-5100 FLARE
- ㉕ TK-6000/6050 SLOP TANKS
- ㉖ CHROMATOGRAPH BUILDING
- ㉗ P-9050 FLARE K.O. PUMP
- ㉘ TK-6200 STABILIZER AREA DRAIN SWAMP
- ㉙ P-6205 STABILIZER AREA DRAIN SWAMP PUMP
- ㉚ TK-6300 COMPRESSOR BUILDING DRAIN SWAMP
- ㉛ P-6305 COMPRESSOR BUILDING DRAIN SWAMP PUMP
- ㉜ TK-6400 CRYO AREA DRAIN SWAMP
- ㉝ P-6405 CRYO AREA DRAIN SWAMP PUMP
- ㉞ TK-7000 FRAME LUBE OIL STORAGE TANK
- ㉟ P-7005 FRAME LUBE OIL PUMP
- ㊱ TK-7050 CYLINDER LUBE OIL STORAGE TANK
- ㊲ P-7055 CYLINDER LUBE OIL PUMP
- ㊳ TK-7750 METHANOL STORAGE TANK (CRYO)
- ㊴ TK-7750 METHANOL STORAGE TANK (PLANT)
- ㊵ SWITCH RACK
- ㊶ STABILIZER HMO HEATER
- ㊷ STABILIZER HMO PUMP SKID
- ㊸ A-301 EXPANDER COMPRESSOR AFTERCOOLER
- ㊹ UPPER LOWER FILTER SKIDS
- ㊺ V-4424/4444 MOL SIEVE DEHYDRATORS
- ㊻ SWITCHING VALVE SKID
- ㊼ UPPER LOWER PROCESS SKIDS
- ㊽ EC-101 TURBO EXPANDER SKID
- ㊾ V-402 COLD SEPARATOR
- ㊿ E-201206 GAS/GAS EXCHANGER/REFLUX CONDENSER
- 1 T-501 DEMETHANIZER
- 2 E-204205 REBOILER/SIDE HEATER
- 3 V-404 PRODUCT SURGE TANK
- 4 P-6080/1802 PRODUCT CHANGE PUMPS
- 5 H-741 REGEN GAS HEATER
- 6 H-781 CRYO HMO HEATER
- 7 H-781 CRYO HMO PUMP SKID
- 8 A-341 REGEN GAS COOLER
- 9 TK-7700 STABILIZER OIL CYLINDER LUBE OIL STORAGE TANK
- 10 P-7780 STABILIZER OIL CYLINDER LUBE OIL STORAGE TANK PUMP
- 11 P-7780 METHANOL INJECTION PUMP
- 12 V-5200 CLOSED DRAIN TANK

NOTES

**PRELIMINARY**  
 ISSUED FOR CLIENT REVIEW COMMENT

ISSUED BY: WILLIAM SEAN THOTTER, P.E.  
 LICENSE NO: PE 47298  
 STATE OF NORTH DAKOTA  
 THE PURPOSES LISTED ABOVE, AND IS NOT TO BE USED FOR CONSTRUCTION OR AS A BASIS FOR DESIGN.

NO.	TITLE	REVISIONS		BY	CHK	APP
		DATE	DESCRIPTION			

**KINDER MORGAN**  
 ROSEVELT II PROCESSING FACILITY  
 150MM GAS PROCESSING FACILITY  
 PLOT PLAN

DWG NO: D-10487-C03-100  
 MCKENZIE CO., INC.

REV: B1

1-Kinder Morgan/2nd Floor/Design/100 Engineering/DESIGN/1-15/2018/10487-C03-100

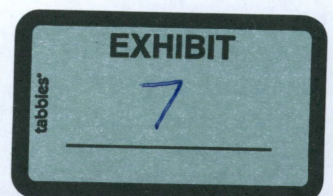




**Late Filed Exhibit 7: Spill Plan**

## Spill Prevention

The spill prevention control and countermeasures plan for the existing Roosevelt Plant was submitted with the Application for a Certificate of Site Compatibility and Waiver (Docket No. 1, Submitted July 17, 2018). The completion of this plan specific to the Roosevelt Expansion is dependent on detailed engineering information of the actual equipment being installed. As the plant expansion is still in the engineering phase and all equipment has not been specified or procured yet, this calculation will be performed when detailed engineering is complete. Hiland requests that this information be submitted to the commission following permit approval but before the facility is placed in service. The anticipated availability date for this information is July 1, 2019.



**Late Filed Exhibit 8: Power Load**

Roosevelt Plant Power Load

Existing Roosevelt Plant: Total connected load - 9 MVA

Roosevelt Expansion Plant: Total connected load - 20 MVA (conservative estimate)

Total Supply Capacity: 25 MVA



**Late Filed Exhibit 9: Map Detailing Location of Landowners**



**Legend**

- Facility
-  Residence
-  Plant Extents



tabbles

**EXHIBIT**

9



**KINDER MORGAN**

Roosevelt  
Landowner Relative Position



GISMS-4328

10/11/2018

**Late Filed Exhibit 10: Timeline For Plant Expansion**

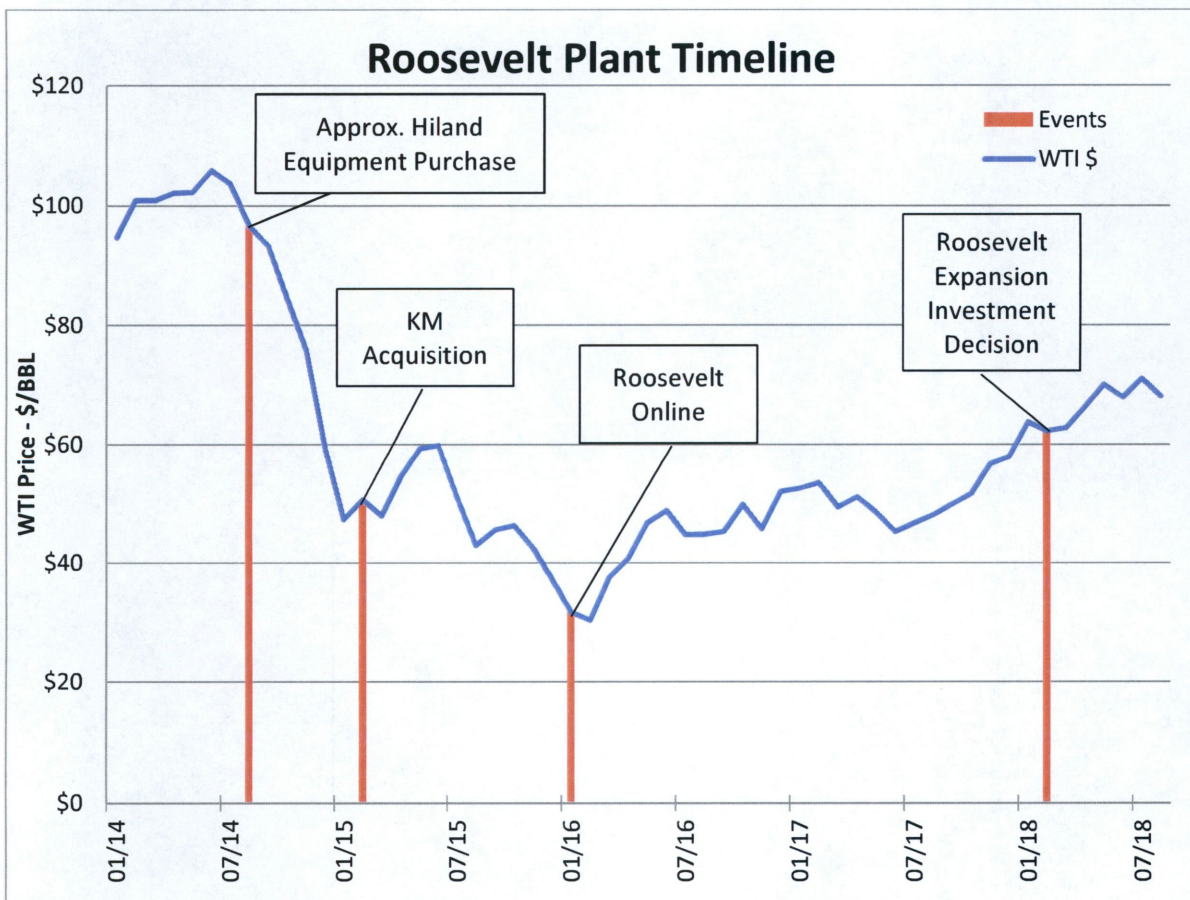
### Roosevelt Plant - Timeline

As testified during the hearing, a typical cryogenic plant project takes approximately 18 months for completion of engineering, procurement, and construction. Prior to commencement of these tasks, there is approximately 4-6 months of planning and bidding required before initiating the engineering and procurement of the plant. Based on this timeline, the typical total duration of a cryogenic plant project is approximately 20-24 months.

In order to clarify testimony given in reference to the existing Roosevelt Plant, Kinder Morgan purchased Hiland Partners Holdings in February of 2015. The engineering had been initiated and the material for the cryogenic plant had already been purchased by Hiland Partners prior to the acquisition by Kinder Morgan. Kinder Morgan had neither knowledge nor input in the sizing of the existing Roosevelt Plant.

The proposed Roosevelt Expansion is the result a proposed increase in gas production forecasted by gas producers in the area. The financial decision to expand the plant, rather than other engineering solutions to deal with the production increase, was made in the first quarter of 2018.

The following is a chart relating milestones of the Roosevelt Plant in relation to crude price.



**Late Filed Exhibit 11: Unanticipated Find Plan**



**STATE  
HISTORICAL  
SOCIETY**  
OF NORTH DAKOTA

August 16, 2018

Doug Burgum  
*Governor of North Dakota*

**North Dakota  
State Historical Board**

Terrance Rockstad  
*Bismarck - President*

H. Patrick Weir  
*Medora - Vice President*

Steve C. Martens  
*Fargo - Secretary*

Albert I. Berger  
*Grand Forks*

Daniel Stenberg  
*Watford City*

Sara Otte Coleman  
*Director  
Tourism Division*

Kelly Schmidt  
*State Treasurer*

Alvin A. Jaeger  
*Secretary of State*

Melissa Baker  
*Director  
Parks and Recreation  
Department*

Sondra Goebel  
*Representative  
Department of  
Transportation*

Claudia J. Berg  
*Director*

*Accredited by the  
American Alliance  
of Museums since 1986*

Daniel M. Salas  
In Situ Archaeological Consulting  
695 Dresden Drive  
Chaska, MN 55318

**ND SHPO Ref: 18- 1030 PSC Kinder Morgan Roosevelt Gas Plant Expansion**  
Project: Procedures for Unanticipated Cultural Resource Discoveries  
[T149N R98W Section 30, SW-SE]

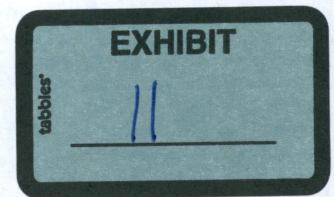
Dear Daniel:

We have received and reviewed: **18-1030 PSC** documentation for: "Roosevelt Gas Plant Expansion Project: Procedures for Unanticipated Cultural Resource Discoveries," by E3 Environmental, LLC, (2018) and find it acceptable.

Thank you for the opportunity to review this project. Please include the ND SHPO reference number listed above in any further correspondence for this specific project. If you have any questions, please contact either Paul Picha at (701) 328-3574 or [ppicha@nd.gov](mailto:ppicha@nd.gov) or Susan Quinnell at (701) 328-3576 or [squinnell@nd.gov](mailto:squinnell@nd.gov).

Sincerely,

Claudia J. Berg  
State Historic Preservation Officer (North Dakota)  
and  
Director, State Historical Society of North Dakota



**Roosevelt Gas Plant Expansion Project**  
**Procedures for Unanticipated Cultural Resources Discoveries**

**Prepared for:**

Hiland Partners Holdings LLC

**Prepared By:**

E3 Environmental, LLC

**2018**

E3 Environmental, LLC <sup>TM</sup>  
871 Jefferson Ave  
St. Paul, MN 55102

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## **SECTION 1: INTRODUCTION**

This Unanticipated Discovery and Monitoring Plan (Plan) presents procedures to be implemented in the event potential cultural resources are discovered during construction of the Hiland Partners Holdings LLC (Hiland) Roosevelt Gas Plant Expansion Project (Project) that is located in McKenzie County, North Dakota

Significant historical or archaeological artifacts or sites under the jurisdiction of the State of North Dakota or its political subdivisions are protected under Section 55-02-07 of the North Dakota Century Code (NDCC). Furthermore, NDCC Section 23-06-27 and North Dakota Administrative Code (NDAC) Section 40-02-03 provide special protection of human burial sites, human remains and burial goods. This Plan presents procedures for addressing potential cultural resource discoveries identified during the construction of the Project, including procedures for the initial treatment of discoveries, the evaluation and treatment of discoveries, and the treatment of human remains.

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## **SECTION 2: TRAINING**

Training is necessary in order for construction personnel to recognize potential archaeological resources. All construction personnel will meet with Hiland representatives for basic training prior to participating in construction. This training will provide orientation regarding recognition of cultural resources as well as a general overview of the culture history of the region, so construction personnel are familiar with the types of archaeological resources that may be encountered during construction. The training will also outline the steps to be followed in the event of a potentially significant archaeological discovery during construction (e.g., the discovery of human remains). The following items will be reviewed within the program:

- Definition of a discovery and examples of discoveries;
- Steps towards discovery protection until such time as they can be properly evaluated by a qualified archaeologist;
- Proper notification of the appropriate Hiland personnel;
- Necessity of reporting discoveries in a timely manner and complying with the other stipulations provided in this plan;
- Need to treat any human skeletal remains that are encountered with dignity and respect; and
- Penalties for failure to report discoveries or to comply with the procedures outlined in this Plan.

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## **SECTION 3: UNANTICIPATED CULTURAL RESOURCE DISCOVERY PROCEDURE**

### **3.1 Definition of an Unanticipated Cultural Resources Discovery**

Cultural resource discoveries consist of evidence of human activity, more than 50 years old, with potential to yield data pertinent to regional history and prehistory. Prehistoric discoveries include, but are not limited to, features (small hearth features, housepit features, storage features, etc.), artifact concentrations (points), and activity areas. Historic discoveries include, but are not limited to, features (historic hearths, foundations, structures, old canals, roads, etc.), artifact concentrations (glass or pottery shards, trash deposits, abandoned equipment) and activity areas. Isolated historic artifacts or small concentrations of non-human bone will not be considered discoveries.

### **3.2 Procedure for Addressing Discoveries Identified by Construction Personnel**

The following procedures will be initiated in the event unanticipated potential cultural resources are discovered.

- Construction activity that resulted in the exposure of the discovery will be **immediately** halted.
- The Construction Manager will be notified.
- A buffered area will be set up around the discovery. A minimum 50-foot (15 m) perimeter is recommended. Visual barriers such as temporary fencing are recommended. No ground disturbing activities, including vehicle traffic, are allowed within the area until the proper cultural resource evaluation has been completed.
- Hiland will notify and consult a professional archaeologist to review the discovery.
- During the review phase, suspension of all work and vehicle traffic in the buffered area is required. If the archaeologist determines that the discovery is non-cultural, Hiland will be notified and the halted construction activity can resume.
- If the discovery is deemed cultural and a field visit is required, no ground disturbing activities are allowed within the buffered discovery area until the field visit by the archaeologist occurs. During the field visit, the archaeologist will determine whether the discovery is potentially significant.

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### **3.3 Procedure for Treatment of Discoveries by Professional Archaeologist**

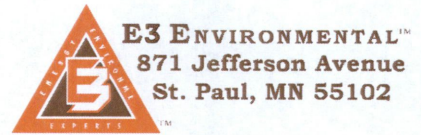
An archaeologist will review and fully record a discovery according to approved standards. The initial treatment of any discovery will consist of recording the location of the discovery; recording summary data concerning the feature(s) and/or other remains (including dimensions, qualitative characteristics, and associated remains); photographing the discovery and the overall context of the exposed material; and profiling trench walls containing cultural features or strata (where safe and prudent). The feature(s) will then be excavated and a sample will be collected for laboratory analysis as appropriate. Feature plans and profiles will be drawn. Features will be photographed. Uncollected feature fill will be screened using 0.25-inch mesh. If necessary, additional horizontal exposure of sediments/deposits around the feature may be investigated to evaluate the feature context.

When appropriate, the location around the discovered cultural material will be tested to determine the extent of the cultural material. Testing can include, but is not limited to, excavation of controlled units over and around the feature area or placement of test units and/or auger probes. Testing will be designed to identify the nature and extent of the discovery and any associated activity area(s) or other features, if present.

### **3.4 Special Procedures for Discoveries of Human Remains**

Should human remains be encountered during construction of the Project, per the protocol outlined above, all work will be immediately halted at the general location of the discovery. The location will be immediately secured, including a buffer zone of 100 feet (30 m) surrounding the discovery. Construction personnel and vehicles will promptly vacate the buffer zone. Vehicle traffic within the buffer zone will be limited to that necessary to remove other vehicles and equipment from the buffer zone. Care will be taken to prevent any disturbance of the potential human remains during removal of vehicles and equipment. Until appropriate consultation has occurred, the discovery shall remain protected from any disturbance, such that no remains or associated artifacts are touched, moved or collected.

Following notification of the Construction Manager and the Hiland Project Manager, Hiland will immediately notify local law enforcement and the county coroner (see Table 1).



**Table 1: Project and Agency Contact Information**

<b>CONTACT</b>	<b>NAME</b>	<b>PHONE NUMBER</b>
Hiland Construction Manager		O: M:
Hiland Project Manager		O: M:
Environmental Representative (on-site)	TBD	M:
E3 Environmental	Katie Schmidt	O: 651-282-0652 M: 651-216-6881
McKenzie County Sherriff	Gary Schwartzberger	701-444-3654
McKenzie County Coroner	McKenzie County Medical Examiner & Coroner	701-770-4522
North Dakota State Historic Preservation Office	Paul Picha (Chief Archaeologist)	701-328-3574

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**SECTION 4: STATE HISTORICAL SOCIETY COORDINATION AND REPORTING**

If the discovery is deemed potentially significant, Hiland and the archaeologist will consult and coordinate with the State Historical Society to propose procedures for further treatment of the discovery, while minimizing impacts to the construction schedule to the extent possible. Suspended construction activities in the discovery area may not proceed until approval has been obtained from the State Historical Society and other involved agencies and parties.

A report detailing all cultural resources identified, recorded, tested and/or excavated during the construction phase of the Project, regardless of significance, will be prepared by the archaeologist and submitted to the State Historical Society for review within six months of project completion.

**Late Filed Exhibit 12: Resident Mitigation Plan**

October 19, 2018

Mr. Patrick Fahn  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480

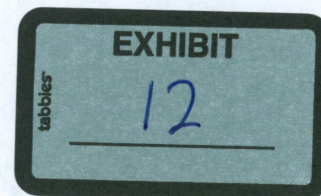
**RE: Landowner Mitigation Plan  
Case No. PU-18-277  
Hiland Partners Holdings LLC  
Roosevelt Gas Plant Expansion Project**

To Mr. Fahn:

On September 27, 2018, the North Dakota Public Service Commission (the "Commission") held a public hearing concerning the proposed Roosevelt Gas Plant Expansion Project to be constructed and operated by Hiland Partners Holdings LLC ("Hiland") in Case No. PU-18-277 before the Commission. At the hearing, the Commission heard public testimony from two (2) landowners whose residences are near the existing Roosevelt Gas Plant, namely Mr. Denton Zubke and Mr. Keith Helmuth. The purpose of this letter is to address the concerns expressed by Mr. Zubke and Mr. Helmuth and the mitigative measures Hiland has or will put in place to address said concerns as it moves forward with this project and other projects which may impact the residents of North Dakota.

1. Landowner Concerns

At the hearing, Mr. Zubke testified regarding two specific concerns he has with the existing plant and the proposed expansion project. First, Mr. Zubke expressed his concerns regarding the night light exposure at his residence caused by the use of flood lights during construction and the flaring which occurs during normal operations. Second, Mr. Zubke expressed concerns over the amount of noise emanating from the plant at certain times during normal operations. Mr. Zubke believes that the value of his property has been diminished as a result of these issues.



Mr. Helmuth expressed concerns related to the processes and procedures utilized by certain companies with respect to proposed pipelines on his property and access to his land for surveying or construction purposes. Mr. Helmuth also raised concerns regarding (i) the noise levels at the plant, (ii) the capacity of certain transmission pipelines connected to the plant, (iii) the handling of increased amounts of hydrogen sulfide gas (H<sub>2</sub>S) as a result of aging oil and gas wells in the area, and (iv) the flaring of enriched gas.

Both Mr. Zubke and Mr. Helmuth testified as to the lack of communication from Hiland regarding the expansion project.

## 2. Landowner Follow Up and Mitigation

Since the date of the hearing, representatives of Hiland have had the opportunity to speak directly with Mr. Zubke and Mr. Helmuth regarding the concerns set forth above. Hiland Right of Way Agent Myles Fisher spoke to Mr. Zubke on the evening of October 2, 2018, and set up a meeting for the next day. Myles and another Hiland employee, Steve Lindquist, both met with Mr. Zubke on October 3, 2018 to discuss his concerns and possible resolutions. Mr. Zubke called Myles later that day with tax questions. During the same telephone conversation, Hiland made a verbal monetary offer in settlement of all claims Mr. Zubke may have with respect to the Roosevelt Plant. On October 4, 2018, Mr. Zubke denied the verbal settlement offer and counteroffered. Written settlement offers were sent to Mr. Zubke on October 16, 2018, to which Hiland has not yet received a response from Mr. Zubke.

Myles Fisher and Ben Scheeler, a Diamond Resources employee, met with Keith Helmuth on October 3, 2018. Mr. Helmuth expressed concerns about how he was initially contacted for survey permission related to a Hiland gathering line. Myles apologized to Mr. Helmuth for any miscommunication and he and Mr. Helmuth discussed the logistics surrounding a potential gathering line. Mr. Helmuth granted Hiland written survey permission for such purposes.

In response to the concerns expressed at the hearing and the one-on-one talks with Mr. Zubke and Mr. Helmuth, Hiland has instituted mitigative measures for the proposed Roosevelt Gas Plant Expansion Project and ongoing operations at the Roosevelt Plant. Such mitigative measures include, but are not limited to: (i) a continuing, good faith effort to resolve Mr. Zubke's concern regarding the lighting at the plant and the diminution of his property value, (ii) a grant of access and survey permissions from Mr. Helmuth concerning survey for the potential new gathering line, and (iii) providing reliable points of contact of Hiland personnel to respond to any concerns involving the Roosevelt Plant both during and after construction and proposed gathering pipelines associated therewith.

Patrick Fahn  
October 19, 2018  
Page 3

3. Conclusion

Hiland takes very seriously the concerns of all landowners and residents which may be impacted by its energy development in the State of North Dakota. As Hiland moves forward with the Roosevelt Gas Plant Expansion Project and other projects in the state, Hiland will strive to better communicate with all those who may be affected and implement processes and procedures to mitigate the negative effects of such development. If the Commission desires additional information related to Hiland's mitigation plan or its communications with Mr. Zubke or Mr. Helmuth, please advise.

Sincerely,

A handwritten signature in black ink, appearing to read "Johnny McGee", with a stylized flourish at the end.

Johnny McGee  
Vice President – Right of Way  
Hiland Partners Holdings LLC

65015125

**Late Filed Exhibit 13: Increased Truck Traffic Survey**

## Increased Truck Traffic

### Construction:

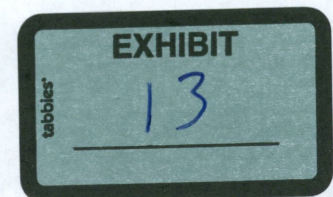
Truck traffic will peak early in the project during grading and soil work. During this phase which is estimated to last 2-4 weeks, 3 trucks will be making several trips to and from the Roosevelt Plant each day to haul in new fill soil for the site. Following completion of soil work, the traffic is estimated to slow to approximately 20 trucks per month for delivery of equipment and material for the duration of the project.

### Operations:

As there is no truck loading rack at the Roosevelt Plant, current truck traffic is limited to:

- Daily UPD/Fed-EX deliveries
- An estimated monthly delivery of lube oil and/or methanol
- An annual unloading of the atmospheric wastewater tanks on site

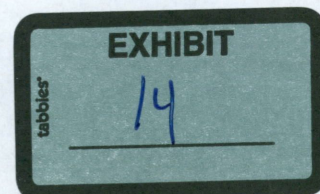
The Roosevelt Expansion Project will add additional gas throughput and rotating machinery. Thus additional trucking for ongoing operations is estimated to add one additional lube oil and methanol delivery per month to current traffic levels.



**Late Filed Exhibit 14: Blast Radius**

## Blast Radius

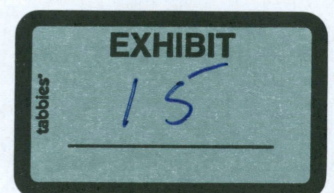
The blast radius report for the existing Roosevelt Plant was submitted with the Application for a Certificate of Site Compatibility and Waiver (Docket No. 1, Submitted July 17, 2018). The completion of this calculation for the Roosevelt Expansion is dependent on detailed engineering information of the actual equipment being installed as well as the specific location of its installation. As the plant expansion is still in the engineering phase and all equipment has not been specified or procured yet, this calculation will be performed when this information is finalized. Hiland requests that this information be submitted to the commission following permit approval but before the facility is placed in service. The anticipated availability date for this information is July 1, 2019.



**Late Filed Exhibit 15: NGL Spill Information**

## NGL Spill Information

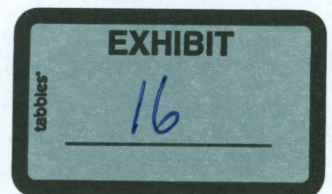
Hiland's process modeling indicates that if released to atmosphere, approximately 99.4% of the NGL volume would vaporize into the gaseous phase. The response to the release of the remaining 0.6% that remains a liquid would be handled according to Hiland's SPCC plan.



**Late Filed Exhibit 16: Information Relative to Flaring of Rich Gas**

## Gas Flaring

The Roosevelt Plant Expansion project includes the installation of a flare system. One component included in this system is a vessel known as a flare knock out. The purpose of this vessel is to prevent liquids from travelling to the flare tip. Design and sizing of this vessel is defined by and will be executed according to calculations and guidance contained in the American Petroleum Institute (API) 521 Standard.



**Late Filed Exhibit 17: Pipeline Status**

## Pipeline Status

Hiland is not constructing any gas transmission pipelines associated with the Roosevelt Plant Expansion project. However, Hiland is currently in construction of approximately 20 miles of gathering lines in McKenzie and Williams County and in various stages of preparation for approximately 70 additional miles of gathering lines in McKenzie and Williams County.

