



U.S. Department
of Transportation
**Pipeline and Hazardous
Materials Safety Administration**

1200 New Jersey Avenue, S.E.
Washington, D.C. 20590

March 13, 2018

Bob Dundas, P.G.
Environmental Coordinator
Belle Fourche Pipeline Company/Bridger Pipeline LLC
455 North Poplar Street
Casper, WY 82601

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MAR 14 2018
ENVIRONMENTAL

**RE: LETTER OF APPROVAL: Belle Fourche Pipeline and Bridger Pipeline LLC Combined
Operated Systems Oil Spill Response Plan, Sequence Number: 2740, March 2018**

Dear Mr. Dundas:

The Pipeline and Hazardous Materials Safety Administration (PHMSA) has received and reviewed Belle Fourche Pipeline and Bridger Pipeline LLC's amended Oil Spill Response Plan for the Combined Operated Systems dated March 2018. We conclude that the plan complies with PHMSA's regulations concerning onshore oil pipelines found at 49 Code of Federal Regulations (CFR) Part 194. Your response plan is approved.

This approval is valid for five years from the date of this letter. If discrepancies are found during PHMSA inspections, or if new or different operating conditions or information would substantially affect the implementation of this plan, you will be required to resubmit a revised plan. See 49 CFR § 194.121(b).

Should you have any questions or concerns, please contact me at (202) 366-4595 or by email at PHMSA.OPA90@dot.gov. Please include the sequence number and your PHMSA Operator Identification Number on any future correspondence.

Sincerely,

David K. Lehman, Director
Oil Spill Preparedness and Emergency Support Division
Office of Pipeline Safety

cc: PHMSA Central and Western Regions

OPA '90
Oil Spill Response Plan
Belle Fourche Pipeline Company/Bridger Pipeline LLC
Combined Operated Systems (Sequence Number 2740)

Section 1: INFORMATION SUMMARY

- (1) Formerly, both Belle Fourche Pipeline Company (BFPL) and Bridger Pipeline LLC (BPL) (hereinafter referred to collectively as Pipelines) operated under individual, independent response plans approved by PHMSA with unique geographic Response Zones assigned within each plan. However, after careful consideration, BFPL and BPL have elected to combine their three individual plans into one comprehensive response plan document. A combined response plan will greatly enhance the effectiveness of any response effort by the Pipelines, allow for better cross-training of employees between companies and continue to allow for sharing of spill response equipment assets at the time of a response. The existing individual response plans and their corresponding PHMSA Sequence Numbers being combined into one plan are:

Belle Fourche Pipeline Co.: Sequence Numbers- 654 Western North Dakota Response Zone, 1021 Central Eastern Montana Response Zone, 1022 SE Montana/NE Wyoming Response Zone, 1024 SE Wyoming Response Zone

Belle Fourche Pipeline Co. (Sussex Diesel System): Sequence Number- 1264 Sussex Response Zone

Bridger Pipeline LLC: Sequence Number: Sequence Numbers- 1648 Poplar Response Zone, 1649 Baker/Little Missouri Response Zone, 1650 Butte Response Zone

The three new response zones (Sequence Number 2740) are titled North Dakota, Montana, and Wyoming.

- (a) The Pipelines operate crude oil pipelines and breakout tanks in western North Dakota, eastern Montana, and eastern Wyoming. BFPL also operates the Sussex diesel fuel pipeline system in the Powder River Basin area of WY and pipeline and terminalling systems for Eighty-Eight Oil LLC (EEOLLC) in eastern Wyoming. BPL also operates pipeline and terminalling systems for Butte Pipe Line Company. These collective systems cover approximately 3000 miles. Either Belle Fourche Pipeline or Bridger Pipeline can be reached at:

455 N. Poplar Street
P.O. Drawer 2360
Casper, Wyoming 82602
(307) 237-9301

Pipelines are prepared to respond immediately upon discovery of any oil spill within the systems they operate. Crude oil and diesel fuel are materials of value, spills are a costly occurrence to be responded to as quickly as possible to minimize environmental damage and reduce product loss.

(2) The pipeline systems have been broken down into three manageable response zones based on the physical layout of the lines, proximity of response capability, location of Pipeline employees and the operating State. Within each response zone discernible, discrete line sections have been reviewed to determine their ability to cause "significant and substantial harm" in the event a release of crude oil occurs.

Response zones containing line sections meeting the criteria for "significant and substantial harm" are identified as indicated below. These decisions were made based on the "Line Section Response Plan Decision Criteria" and the accompanying "Line Section Exemption Decision Tree".

The Three Response Zones, from North to South are:

North Dakota

McKenzie, Golden Valley, Billings, Bowman, Dunn, Parshall, Mountrail and Stark Counties, North Dakota

Montana

Sheridan, Roosevelt, Richland, Dawson, Prairie, Fallon, Carter, Powder River and Wibaux Counties, Montana

Wyoming

Crook, Campbell, Natrona, Johnson, Converse, Niobrara, Goshen, Platte and Weston Counties, Wyoming

(b) (1) **An Information Summary** for each Response Zone Appendix is included in this section.

(c) **CERTIFICATIONS:**

Belle Fourche Pipeline operating on behalf of itself and Eighty - Eight Oil LLC and Bridger Pipeline LLC operating on behalf of itself and Butte Pipe Line hereby certifies that it has collectively obtained, through contract or other approved means, the necessary private personnel and equipment to respond to the maximum extent practicable, to a worst-case discharge or a substantial threat of such a discharge.

The Pipelines have prepared this Response Plan to be consistent with the National Contingency Plan, and the Region VIII Area Contingency Plan to the extent possible. The plan will be updated to assure consistency as the RCP/ACP is modified.

The Pipelines response plan will be submitted to DOT PHMSA for review and approval every five years from the last plan approval date.

Signed: _____



H. A. True III

BSJ

**President – Belle Fourche Pipeline Company &
H. A. True III Trust, H.A. True III, Trustee –Bridger Pipeline LLC**

Dated: _____

11/3/17