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September 1, 2020

*Via E-mail Only*

Mr. Adam Renfandt  
Analyst Public Utilities Division  
North Dakota Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
*arenfandt@nd.gov*  
*ndpsc@nd.gov*

**RE: Case No. PU-18-404  
Belle Fourche Pipeline Company  
8-inch Wilson-Bowline Pipeline Conversion Project  
Our File No. 013084-000013**

Dear Mr. Renfandt:

I am writing to provide an update to Belle Fourche Pipeline Company's ("Belle Fourche") February 25, 2020 correspondence (Docket No. 70) regarding the status of the depth of cover study for the Wilson to Bowline pipeline (the "Pipeline") referenced in Order Provision No. 7 of the Commission's September 4, 2019 Findings of Fact, Conclusions of Law and Order. Notice is hereby provided that a depth of cover study has been completed and the following information is provided on behalf of Belle Fourche with respect to the study's findings:

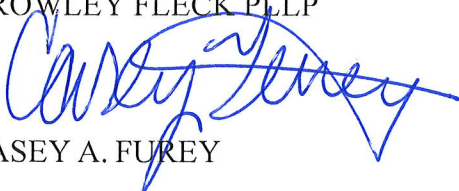
Pursuant to Order Paragraph No. 7, Belle Fourche conducted a depth of cover study on the Pipeline sited in Case No. PU-18-404. To conduct the study the line was located and a depth measurement was taken with a line finder at intervals along the line. There were two locations where a depth was not able to be reported. The first was in a road crossing where the pipeline was too deep to obtain a depth and the second was a location where overhead power interfered with the operation of the line finder and the depth function of it. The average depth taken over all the measurement points was 89 inches with the maximum reported depth of 187 inches, and nearly 75% of those sites were in excess of 72 inches.

One location was found that was less than the Commission's specified depth of 48 inches. This location measured 42 inches in depth and is in the SWNW of Section 4, Township 147 North, Range 101 West along McKenzie County Road 27 on U.S. Forest Service managed surface in the segment of the Pipeline that was constructed in 1978. Although this segment measures slightly below the Commission's 48-inch depth specification, the Pipeline remains at a depth protective of public and environmental safety and continues to meet the 30-inch depth requirement of the Pipeline and Hazardous Material Safety Administration. This portion of the Pipeline was constructed in 1978 and has operated without any issues or depth related concerns since this time. Additionally, this segment of the Pipeline is not located under tilled land nor is it located in an erosion prone area. This segment, along with the entire line, will continue to be monitored by periodic pedestrian close interval surveys and bi-weekly aerial patrols. For these reasons, Belle Fourche recommends that no additional action be taken with respect to this location along the Pipeline.

An updated Exhibit 10 map sheet marked with the 42-inch depth location is forthcoming and will be filed in accordance with Order Provision No. 7. Please feel free to contact me with any questions.

Respectfully,

CROWLEY FLECK PLLP



CASEY A. FUREY

cc: Kevin Cook (via email)  
Ken Dockweiler (via email)  
Robert Stamp (via email)