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January 4, 2021

*Via Electronic Mail*

Mr. Adam Renfandt  
Public Utility Analyst  
North Dakota Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
[arenfandt@nd.gov](mailto:arenfandt@nd.gov)  
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**In re: Belle Fourche Pipeline Company  
8-inch Wilson-Bowline Pipeline Conversion Project  
Case No. PU-18-404  
Our File No. 013084-000013**

Dear Mr. Renfandt:

I am writing on behalf of Belle Fourche Pipeline Company (“Belle Fourche”) in response to your December 8, 2020 request for information in Case No. PU-18-404, Docket No. 86. The letter requests information pertaining to planned corrective action regarding erosion and sedimentation issues identified in Appendix B, Photo 6 of Houston Engineering, Inc.’s Final Permit Compliance Inspection Report 2020 (Docket No. 85) (the “Report”) for the Wilson to Bowline Pipeline (the “Pipeline”). Upon review, Appendix B, Photo 6 depicts a waterbody channel in Township 147 North, Range 101 West, Section 4, however, Photo 8 appears to more specifically identify the referenced erosion in this location. For this reason, Belle Fourche presumes Photo 8 is the erosion referenced in your correspondence.

Belle Fourche respectfully submits that corrective action is unnecessary for the minor erosion depicted in Photo 8 and that this finding is consistent with the Report’s own conclusions. The Report expressly states: “Some minor erosion was observed at the waterbody crossing at Section 4, Township 147W, Range 101N (See Photo 8). This erosion appears to be minor, and no corrective issues are recommended at this time.” Report, Pg. 5 (emphasis added). Additionally, the Report notes that restoration and revegetation along the line appeared successful. “The restoration of disturbed areas and reseeding and revegetation was observed as part of this compliance inspection.

It appears that construction, use of best management practices during construction, and revegetation strategies were successful.” Report, Pg. 5.

The erosion occurs along the segment of the Pipeline that was constructed in 1978 which has been safely operating since this time. Other underground infrastructure has been installed in the vicinity of the Pipeline and it is not apparent that the referenced minor erosion results from the Pipeline’s installation. As referenced in the project’s Order, the Pipeline is monitored in accordance with Belle Fourche’s Combined Operated Systems Oil Spill Response Plan, which has been approved by the Pipeline Hazardous Materials Safety Administration. *See* Docket No. 63 Findings of Fact, Conclusions of Law and Order Pg. 7. Proposed corrective action could potentially cause more significant disturbance to the area and negate any perceived benefit; therefore, continued monitoring of the Pipeline is sufficient to address any concerns. For the above reasons, Belle Fourche submits that no additional corrective actions are necessary. *See* Report, Pg. 6 (noting one “minor erosion and sedimentation issue” within a waterbody channel and concluding that “no corrective actions are recommended at this time”).

Please do not hesitate to contact me with any questions.

Sincerely,

*/s/ Casey A. Furey*

Casey A. Furey

CAF/lh

cc: Wade Mann (via email)  
Ken Dockweiler (via email)  
Robert Stamp (via email)