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February 10, 2020

*Via Electronic Mail and Hand Delivery*

Mr. Victor Schock  
Public Utility Analyst  
North Dakota Public Service Commission  
600 East Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
[ndpsc@nd.gov](mailto:ndpsc@nd.gov)

In re: ONEOK Bakken Pipeline, L.L.C.  
Pump Station Additions  
Dunn & McKenzie Counties  
Case No. PU-20-018  
Our File No. 072591-000006

Dear Mr. Schock:

On behalf of ONEOK Bakken Pipeline, L.L.C. (ONEOK), the following information is provided in response to the January 24, 2020 request letter filed in the above-referenced matter. Responses to agency requests are provided in *italics*.

1. What is the anticipated time schedule for the following items?:
  - a. Obtaining a certification of corridor compatibility

*ONEOK is requesting an Amendment of its existing Certificate of Corridor Compatibility No. 184 by March 1, 2020.*

- b. Obtaining a route permit

*ONEOK is requesting an Amendment of its existing Route Permit No. 196 by March 1, 2020.*

c. Complete right-of-way acquisition

*ONEOK is in active negotiations with the existing landowners of both pump station locations and anticipates completing acquisition by March 1, 2020.*

d. Testing Operations

*ONEOK anticipates construction will be completed in 6 months. Testing operations are currently planned for Quarter 3 of 2020.*

e. Commencing Operations

*Each pump station will be put into service upon successful completion of testing operations. The pump stations are scheduled to be in service by Quarter 3 of 2020.*

2. Please discuss the existing plans of state or local government, and private entities for other developments at or in the vicinity of the proposed corridor or route?

*ONEOK is currently not aware of any proposed developments in the vicinity of either pump station. Both proposed pump stations are located in sparsely populated rural areas. The closest city to the proposed Big Gulch Pump Station is Killdeer, approximately 17 miles to the southeast. The closest city to the proposed Stony Johnny Butte Pump Station is Watford City, approximately 7.5 miles to the north.*

3. Please provide the chairman of the board of county commissioners for McKenzie and Dunn Counties.

***McKenzie County Board of Commissioners***

*Chairperson*

*Thomas McCabe*

*13802 Highway 85 N*

*Alexander, ND 58831*

*701-828-3068*

*[tmccabe@co.mckenzie.nd.us](mailto:tmccabe@co.mckenzie.nd.us)*

***Dunn County Board of Commissioners***

*Chairperson*

*Craig Pelton*

*40 93<sup>rd</sup> Avenue NW*

*Halliday, ND 58636*

*701-548-8243*

*[craigp@ndsupernet.com](mailto:craigp@ndsupernet.com)*

4. Please discuss the following benefits to be considered under policy criteria.

*A discussion of policy criteria for the 8-inch Bear Creek NGL Pipeline Project was included in Chapter 7 of ONEOK's original Application for a Certificate of Corridor Compatibility and Route Permit filed on December 29, 2015 (Case No. PU-15-801). Updated information applicable to the two proposed pump stations has been provided below, as appropriate.*

- a. Training and utilization of available labor in the state for the general and specialized skills required.

*Initial construction of the new pump stations will require at least 50 workers in North Dakota. ONEOK does not anticipate any new permanent employees will be required when the stations are operational.*

- b. Economies of construction and operation

*ONEOK will invest approximately \$20 million in North Dakota to develop this Project (\$10 million per station). Once constructed and in-service, the continued costs of maintenance and operation of the two new pump stations are expected to be minimal.*

- c. Use of citizen coordination meetings

*ONEOK has established and maintains good relationships with local residents through its long-term regional presence operating various assets in the area. Through these relationships, ONEOK has maintained several grassroots communication channels to inform local residents regarding the developments associated with the Project. ONEOK will continue to maintain contact with local government officials. Through this contact, Project-related information will be exchanged and should concerns arise, ONEOK will work with officials to resolve those issues.*

- d. A commitment of a portion of the energy produced for use in this state.

*The proposed pump stations will be located along ONEOK's existing Bear Creek NGL pipeline which interconnects with ONEOK's existing Bear Creek Natural Gas Processing Plant. The Project will allow for the delivery of additional NGLs from the Bakken and Three Forks production areas to facilities in the Mid-Continent and Gulf Coast for additional processing of the raw feedstock into commercial products prior to distribution to various markets to meet the existing need for agriculture and the petrochemical and plastics industries, as well as for refining and home heating throughout the United States.*

e. Labor relations

*ONEOK maintains positive labor relations with its staff and contract work force and does not anticipate encountering any adverse labor relations on this Project. ONEOK is an equal opportunity employer committed to diversity and inclusion. Additionally, the labor market in the region is generally supportive of the oil and gas industry.*

f. The coordination of facilities

*ONEOK Rockies Midstream (ONEOK's affiliate) owns and operates several gas processing plants in North Dakota (Stateline I and II, Garden Creek I, II and III, Bear Creek, Lonesome Creek, Grasslands, and Demicks Lake) and is in various stages of construction on additional plants (Demicks Lake II, Demicks Lake III, and Bear Creek II). ONEOK provides take-away capacity via pipeline for the NGLs produced at the plants. Coordination of the proposed Project with existing facilities is anticipated to be seamless, as the proposed Project will provide additional take-away transportation capacity of NGLs in North Dakota.*

g. Monitoring impacts

*ONEOK has established and maintained positive landowner and community relationships throughout the region through its open communication and commitment to corporate citizenship standards that are based on integrity. ONEOK monitors landowner concerns through its ROW department and responds to all reasonable requests. In a similar manner, ONEOK monitors community concerns and responds to all reasonable concerns brought to its attention by local community leaders. ONEOK will select a contractor for construction of the Project and will coordinate the oversight responsibilities for construction activities with this contractor throughout the Project. Environmental responsibilities will be coordinated in the same manner.*

*During operation, pipeline control personnel provide 24-hour electronic surveillance of ONEOK pipeline operations. In addition, ONEOK uses a number of inspection methods and processes to mitigate corrosion and minimize the potential for third-party damage to the pipelines. These include regular ROW patrols, inspections of cathodic protection equipment, and coordination with the State One-Call Centers to mark the pipeline or to be present during excavation to ensure the public's safety and the integrity of the pipeline.*

*ONEOK designs, constructs, operates, and maintains its pipeline systems to ensure safety and reliability. If a leak were detected, the company has the ability to stop the flow of product into and out of the pump stations remotely from its control center. Both pump stations will be equipped with remote valves that can be operated from this control center.*

*ONEOK continues to establish and maintain contact with appropriate fire, police, and other public officials. This communication establishes the responsibility and resources of each government organization that may respond to a pipeline emergency. ONEOK also acquaints officials with the abilities of the pipeline operator when responding to an emergency. In all cases, emergency responders are directed to protect people first, then the environment next, and then property.*

h. Location and design

*The two new pump stations are being sited in accordance with North Dakota Energy Conversion and Transmission Facility Siting Act (NDCC chapter 49-22). Locations of the two stations have been selected to avoid and minimize environmental and human impacts while meeting the purpose and need of the Project.*

*Facilities will be constructed and operated according to all applicable regulations. The Project will meet or exceed state and federal safety requirements and will be designed in accordance with 49 CFR part 195. All persons and firms providing service to ONEOK are required to conduct their work in compliance with environmental conditions, permit authorizations, and applicable regulations and will be held accountable for their actions.*

i. Utilization of existing and proposed rights of ways and corridors

*Both pump station boundaries partially overlap with previously certificated Corridor No. 184; however, each will require some additional adjacent land for facility infrastructure. Please refer to Section 1.1 and Exhibit B of the Application for an Amendment to Corridor Certificated No. 184 and Route Permit No. 196 for further information.*

j. Other existing or proposed transmission facilities.

*Both pump stations will be located along ONEOK's existing Bear Creek NGL pipeline, partially overlapping with the original workspace, permanent easement, and previously certificated NDPSC Corridor. Approximately 2.5 acres of the 5-acre boundary of the Stony Johnny Butte Pump Station is located within the previously certificated Corridor, while approximately 3.5 acres of the 7-acre boundary at the Big Gulch Pump Station is located within the previously certificated Corridor. Please refer to Exhibit B of the application for more information.*

*ONEOK, Inc. is a leading midstream service provider and owner of one of the nation's premier NGL systems, connecting NGL supply in the Mid-Continent, Permian and Rocky Mountain regions with key market centers and an extensive*

*network of natural gas gathering, processing, storage and transportation assets. The company owns and operates:*

- *7,460 miles of NGL gathering pipelines;*
- *5,000 miles of NGL distribution pipelines;*
- *27 billion cubic feet of storage capacity;*
- *7 NGL fractionators;*
- *8 NGL product terminals; and 860,000 bpd of net NGL fractionation capacity.*

On January 10, 2020, ONEOK filed a Combined Application for Waiver or Reduction of Procedures and Time Schedules (Application for Waiver) along with its Amended Application for Certificate of Corridor Compatibility No. 184 and Route Permit No. 194 (Amended Application). Docket No. 1. ONEOK filed its Application for Waiver under N.D.C.C. § 49-22.1-05 which permits an applicant to request waiver of any of the procedures or time schedules set forth under the Siting Act (Ch. 49-22.1). As set forth in its Application for Waiver, ONEOK requested that the Commission waive the provisions of § 49-22.1-10 providing for public hearing, and issue notice of opportunity for hearing on its Amended Application and Application for Waiver in accordance with N.D.C.C. § 49-22.1-10(2).

The locations of the two proposed pump stations fall approximately 200 and 375 feet, respectively, outside of Certificated Corridor No. 184. *See*, Docket No. 1, Amended Application, pg. 2. As explained in the Amended Application, the pump station locations fall entirely within the one-mile wide study area previously analyzed for the Bear Creek NGL Pipeline and filed with the Commission in Case No. PU-15-801. Additionally, ONEOK conducted updated natural resource field surveys and cultural investigations for each site in 2019, and as provided for in its Amended Application, no Avoidance or Exclusion Areas will be impacted as a result of the proposed pump stations. The Commission previously concluded that 1) the location, construction, and operation of the Bear Creek NGL Pipeline will produce minimal adverse effects on the environment and upon the welfare of the citizens of North Dakota; 2) the location, construction, and operation of the pipeline are compatible with the environmental preservation and the efficient use of resources; and 3) the pipeline will minimize adverse impacts which ensuring continuing system reliability and integrity and ensuring that energy needs are met and fulfilled in an orderly and timely fashion. *See*, Case No. PU-15-801, Docket No. 32, Order Findings of Fact Nos. 5-9.

As demonstrated by ONEOK's Amended Application, Application for Waiver, and as provided herein, good cause exists for the Commission to issue notice of opportunity for hearing on ONEOK's Applications. In consideration of the time schedules set forth in paragraph one above, ONEOK respectfully requests the Commission expedite issuance of notice of opportunity for hearing on its Applications at its February 19, 2020 regularly scheduled meeting.

Please feel free to call should you have any questions. Thank you.

Respectfully,

CROWLEY FLECK PLLP

A handwritten signature in blue ink, appearing to read 'Casey A. Furey', is written over the printed name. The signature is stylized and cursive.

CASEY A. FUREY

CAF/lh

cc: Wade C. Mann (via email)  
Michael Dailey, ONEOK (via email)  
Andrew Hackler, ONEOK (via email)