



# United States Department of the Interior



FISH AND WILDLIFE SERVICE  
North Dakota Ecological Services Field Office  
3425 Miriam Avenue  
Bismarck, North Dakota 58501  
(701) 250-4481, [ndfieldoffice@fws.gov](mailto:ndfieldoffice@fws.gov)

In Reply Refer To:  
2021-CPA-0037  
Oneok Pumping Stations- PU-20-18

February 18, 2021

Mr. Steve Kahl  
Director of Administrations  
Public Service Commission  
600 East Boulevard, Department 408  
Bismarck, North Dakota 58505-0480

Dear Mr. Kahl:

This is in response to the Findings of Fact, Conclusions of Law and Order issued on February 3, 2021, reference the Oneok Pipeline LLC Pump Station Additions in McKenzie and Dunn Counties, North Dakota, PSC Case PU-20-18.

The U.S. Fish and Wildlife Service (Service) offers the comments under the authority of and in accordance with the Endangered Species Act (ESA) (16 U.S.C. 1531 *et seq.*).

The Dakota skipper is a small prairie butterfly listed as a threatened species under ESA. Dakota skippers are obligate residents of high quality prairie ranging from wet-mesic tallgrass prairie to dry-mesic mixed grass prairie. In Northwestern North Dakota, Dakota skippers inhabit dry-mesic hill prairies with abundant purple coneflower (*Echinacea angustifolia*).

The Service would offer the following recommendations in relation to this proposed project. The coordinates provided for the proposed pumping stations indicates that the properties could be constructed on undisturbed native prairie grasslands. Surveys for Dakota skipper butterflies with positive results for occupancy have been conducted near the project. The Service would recommend habitat surveys of these properties to identify areas of suitable habitat per the 2018 Dakota skipper Survey protocol be completed. In the event that suitable habitat is observed, the Service would recommend occupancy surveys prior to construction. Information relative to positive occupancy surveys should be shared with the Service for consultation. Avoidance of impacts to native prairie habitat is recommended to reduce the risk of adverse effects to this species.

The Service appreciates the opportunity to work with the PSC to ensure the conservation of natural resources. Should you have any questions regarding these comments, please have your Staff contact Jerry Reinisch of my staff at (701) 425-2133, or contact myself at (701) 319-0127.

Sincerely,

Drew Becker  
ND Ecological Services Supervisor

Cc: Greg Link, ND Game and Fish Department