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Mr. Steven Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Avenue, Dept. 408
Bismarck, ND 58505-0480

Re: Second Supplement to May 8, 2020 Petition in Case GS-20-205; Gathering Upstream of the Robinson Lake Gas Processing Plant

Dear Mr. Kahl:

In response to questions by Commission staff regarding gas gathering pipelines upstream of the Robinson Lake Gas Processing Plant (“Robinson Lake Gas Plant”), Andeavor Field Services LLC (“Andeavor”), respectfully submits the following additional information:

49 CFR §192.3 defines a gas gathering line as a “pipeline that transports gas from a current production facility to a transmission line or main.” The beginning and endpoints of gathering are defined in 49 CFR §192.8 by incorporating the definition found in the American Petroleum Institute’s (“API”) Recommended Practice 80 (“RP 80”) – Guidelines for the Definition of Onshore Gas Gathering Lines; however, with additional restrictions on potential endpoints of gathering.

An onshore gas gathering line ends at the furthestmost downstream of the following endpoints (from API RP 80 with additional restrictions from 49 CFR §192.8(a) added in italics):

- A. The inlet of the furthestmost downstream natural gas processing plant, other than a natural gas processing plant located on a transmission line; *except that it may not extend beyond the first downstream natural gas processing plant, unless the operator can demonstrate, using sound engineering principles, that gathering extends to a further downstream plant;*
- B. The outlet of the furthestmost downstream gathering line gas treatment facility;
- C. The furthestmost downstream point where gas produced in the same production field or separate production fields is commingled; *except that if the endpoint of gathering, under section 2.2(a)(1)(C) of API RP 80, is determined by the commingling of gas from separate production fields, the fields may not be more than 50 miles from each other,*

unless the Administrator finds a longer separation distance is justified in a particular case;

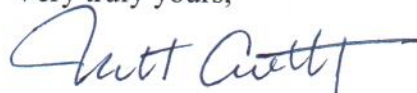
D. the outlet of the furthestmost downstream compressor station used to lower gathering line operating pressure to facilitate deliveries into the pipeline from production operations or to increase gathering line pressure for delivery to another pipeline; *except that the endpoint of gathering, under section 2.2(a)(1)(D) of API RP 80, may not extend beyond the furthestmost downstream compressor used to increase gathering line pressure for delivery to another pipeline;*

E. The connection to another pipeline downstream of: (i) the furthestmost downstream endpoint identified in (A), (B), (C) or (D), or (in the absence of such endpoint) (ii) the furthestmost downstream production operation.

Specific to the gathering lines upstream of the Robinson Lake Gas Plant (12-inch North and West Gathering Lines, 16-inch West Trunk Line and 20-inch Plant to Block Valve Loop), the Robinson Lake gathering line system begins at numerous producing well connects (from production fields that are not greater than 50 miles from each other) and transports the produced gas to the inlet of the Robinson Lake Gas Plant. The furthestmost downstream endpoint of these gathering lines, as identified by the criteria in API RP 80 Paragraph 2.2(a)(1)(A) and (C), is the inlet of the Robinson Lake Gas Plant. Therefore, each of the pipelines listed in this paragraph meets the definition of an onshore gas gathering line. Andeavor gathers such gas under various gathering, purchase, and processing agreements with producers upstream of the Robinson Lake Gas Plant.

Thank you for your assistance with this supplement. An electronic copy of this document will be submitted to ndpsc@nd.gov. The original and seven copies are being sent by U.S. Mail. Please contact me if you have any questions or require additional information on Andeavor's gathering lines upstream of the Robinson Lake Gas Plant.

Very truly yours,



Matthew L Crockett