

**Bridger Pipeline LLC's Responses to
Docket No. 4 Request for Information**

1. Little Missouri National Grasslands is an Exclusion Area. Provide discussion of how the project is compliant with North Dakota Administrative Code section 69-06-08-02. Update the Appendix A, Exhibit A.1 map set with the location of the Little Missouri National Grasslands and State Trust Lands, and provide the GIS layers.

Response: The Little Missouri National Grasslands is located within the Project's one-mile Study Area, however this area is not located within the Project's 300-foot Corridor.

Updated GIS including the Little Missouri National Grasslands and State Trust Lands within the one-mile Study Area is provided along with this supplemental response.

2. Cherry Creek is an Avoidance Area. Provide discussion of how the project is compliant with North Dakota Administrative Code section 69-06-08-02. Is Cherry Creek the only reservoir or municipal water supply located with the proposed corridor? Please provide the locations of any others on the Appendix A, Exhibit A.1 map set.

Response: Cherry Creek is a stream located in McKenzie County, however it does not fall within the Commission's Avoidance Area criteria because it is not a reservoir or a municipal water supply. A segment of the constructed Project crosses Cherry Creek, however impacts were avoided through horizontal directional drilling of this crossing.

With respect to the Cherry Creek Aquifer, the aquifer is not a current municipal water supply. The aquifer varies in depth from 50 to 200+ feet.

3. Section 5.13 of the Application indicates that the North Dakota Geological Survey "offered a review of potential landslide areas long the proposed route, providing a map of susceptible areas". Provide copies of all correspondence with the North Dakota Geological Survey.

Response: The North Dakota Geological Survey database was reviewed to identify areas of potential geologic instability within the Study Area. A copy of correspondence sent to the North Dakota Geological Survey is located in Application Exhibit C.17. To date, no formal response has been received.

4. Section 5.13 indicates that one area located within the proposed corridor cannot be eliminated as a landslide prone area. Is this the same area as located on page ten of Appendix A, Figure 1.A and indicated as a landslide prone area? Will the company perform any geological evaluations on this site to definitively rule out whether this is a geologically unstable area, and then file copies with the Commission upon completion? Is this the only potential landslide area located within the proposed corridor?

Response: An update to Application Section 5.13 will subsequently be filed.

5. Is the pig launcher and receiver at Johnson Corner Station the only pig launcher and receiver associated with the project?

Response: A new launcher will be installed at the Johnson Corner Station within the existing station footprint. A receiver is already located at Wilson Station and nothing additional will be built at this location.

6. File copies of the North Dakota State Historic Preservation concurrence letter with the Class III study. File copies of the correspondence letters sent to them.

Response: A copy of the North Dakota State Historic Preservation Office's concurrence letter is attached as Application Exhibit C.30.

7. When was the start date of the construction for the existing 27-mile pipeline?

Response: June 1, 2018.

8. How much of the \$21 million construction cost is associated with the new 2.4-mile pipeline?

Response: Approximately \$900,000.00.

9. What is the status of the remaining easement agreements that have not been secured for the project?

Response: All easements necessary to construct the Project are currently obtained.

10. Will the company have any 3rd party inspectors onsite during construction of the new 2.4-mile segment?

Response: At this time, Bridger does not anticipate having a third-party inspector onsite during construction.

11. File copies of the field surveys performed by Keitu Engineers & Consultants, Inc. that documented the effectiveness of the company's reclamation efforts for the existing 27-mile pipeline (see section 2.14 of the application). Will an additional inspection be performed for the new 2.4-mile pipeline? If yes, will the company file it with the Commission upon completion?

Response: It is standard operating procedure for Bridger to review its right-of-way reclamation post construction. Keitu's observations regarding the general status of reclamation efforts along the constructed portion of the Project are noted in the Application and no additional reports remain to be filed. Bridger respectfully submits a post reclamation status report would be duplicative of the information traditionally documented and filed by the Commission's construction inspector.

12. File copies of all reports and surveys, including copies of the reports and surveys conducted by Keitu Engineers & Consultants, Inc., and others, which would include the botany survey, the wildlife and habitat assessments and surveys, the tree/sapling/shrub enumeration survey, and the noxious weed survey.

Response: Survey findings are included within the Application. There are no separate reports that remain to be filed.

13. For all surveys, assessments, and studies, provide a table indicating whether each is complete for both the existing and new pipelines and when they were conducted. For any incomplete, provide a status update for each, and the estimated time to completion. Also, indicate in the table how large of area from each side of the proposed route the survey or assessment covered.

Response: All surveys and studies for the Project are complete.

Sharp-tailed grouse lek survey – April 2020 – completed on a one-mile-wide area centered on the Project route

Class I archeological study – July 2020 – completed on a one-mile-wide area centered on the Project route

Class III field study – August 2020 – completed on the 300-foot-wide Project Corridor

Plant life survey – Summer 2020 – completed on the 300-foot-wide Project Corridor

Wildlife and habitat survey – Summer 2020 – completed on a one-mile-wide area centered on the Project route

Aerial raptor nest survey – January 2020 – completed on a two-mile-wide corridor (one-mile on each side of the route)

Wildlife and habitat desktop review – Spring 2020 – completed on a one-mile-wide area centered on the Project route

14. Are there any design differences between the 27-mile existing pipeline and the new 2.4-mile pipeline? If yes, describe the differences.

Response: No.

15. Can any of the block valves be remotely shut off? If yes, which ones, and where are they located on the Appendix A, Exhibit A.1 map set?

Response: The new connection at Johnson Corner will include a remotely controlled valve. A remotely controlled valve is currently located at the Veeder location where the existing pipeline receives oil from the Four Bears 12". No other remotely controlled valves are planned for the project.

16. Is the maximum design flowrate of the pipelines 50,000 barrels per day?

Response: Yes.

17. What is the maximum design operating temperature for the pipelines?

Response: The pipeline operates at ambient temperatures. 100°F max. Temperature is not a design parameter, therefore there is no determination of maximum.

18. Section 5.20.1 of the application states that “[c]onstruction of the Project will involve the installation of 16-inch nominal diameter, steel, API-5L, PSL2, Grade X-52 ERW Line Pipe.” Should this reference an 8-inch nominal diameter pipe?

Response: Yes.

19. Discuss how the company collaborated with IBM to develop a leak detection system. Is this system, marketed by Flowstate, operational on the existing pipeline, and will it be operational on the new pipeline? If yes, describe the effect on public safety, the environment, and operations.

Response: The Flowstate leak detection system (LDS) is in testing on several segments across the Bridger system. LDS runs parallel with the existing line balancing program in Bridger’s SCADA system. The existing Project segment is not yet “live” on the Flowstate LDS but is in the “onboarding” process as one of the next segments to be put up on the system. Bridger anticipates that the Flowstate LDS will be operating by the time the Project is in service.

To date, testing has shown that the Flowstate solution will be capable of detecting smaller leaks and detecting them more quickly by using artificial intelligence. Flowstate continues to seek additional partners to test their solution. Recently, Flowstate presented to the iPIPE organization, a North Dakota based, industry led consortium whose focus is to contribute to the advancement of near-commercial, emerging technologies to prevent and detect gathering pipeline leaks.

20. Does the company conduct tabletop exercises with local emergency response officials? If yes, how often are they conducted, and will one be conducted for this pipeline? Has the company reached out to local emergency responders to inform them of the company’s emergency response procedures?

Response: Bridger takes spill response preparedness seriously and with the utmost diligence. In 2020, Bridger conducted three tabletop exercises and six boom deployment exercises in North Dakota and will conduct four tabletop exercises and seven boom deployment exercises in 2021. Local county emergency response teams are routinely invited to these exercises. In addition to Bridger’s own response resources, Bridger is a charter member of the Sakakawea Area Spill Response LLC (spill cooperative). During

various annual One-Call/ Public Awareness training exercises that Bridger participates in, Bridger has an opportunity to further meet and greet with local/county responders.

21. Section 5.3 of the application indicates the presence of one active Sharp-tailed Grouse lek within the Study Area, and one historical, inactive lek location within the survey corridor. Is the active Sharp-tailed Grouse lek located within the proposed corridor?

Response: The active sharp-tailed grouse lek is located within the one-mile Study Area but is not located within the proposed 300-foot Project Corridor.

22. Section 5.3 of the application indicates the presence of one unoccupied raptor nest within a 2-mile-wide survey area. Is this nest located within the proposed corridor?

Response: The unoccupied raptor nest is located within the one-mile Study Area but is not located within the proposed 300-foot Project Corridor.

23. Is Type B Dakota skipper habitat found within the proposed corridor?

Response: No. Potential Dakota skipper habitat was not found within the proposed 300-foot Project Corridor.

24. Section 5.16 indicates that the Project will not affect any wellhead or source water protection areas. Are any of these or other water sources for organized rural water districts located within the proposed corridor or study area? If yes, indicate the location on the Appendix A, Figure 1.A map set.

Response: No. The Project does not affect any wellhead or source water protection areas. No water sources for organized rural water districts are located within the Study Area.

25. Provide a table listing all permits required for the project and the status of each permit application.

Response: At this time, no additional permits are necessary for the Project.

26. File copies of any agency correspondence that has been received by the company since the submission of the application.

Response: Copies of all agency correspondence received to date are attached.

27. File copies of the following for both segments of the pipeline:

- a. Emergency procedures plan

Response: The U.S. Department of Transportation Pipeline and Hazardous Materials Safety Administration (PHMSA) has approved Bridger's Operated Systems Oil Spill Response Plan. The Plan contains confidential information

regarding system operations therefore a copy of PHMSA's Spill Response Plan Certification and Information is being filed in lieu of Plan.

b. 10-Year Spill History

Response: Bridger's 10-year Spill History is attached.

c. Wetlands delineation report

Response: Bridger, through its consultants, conducted a desktop survey using aerial photographs, USGS topographic maps, and the United States Fish & Wildlife Service National Wetland Inventory identifying wetlands along the pipeline route. Keitu Engineers & Consultants, Inc. followed standard United States Army Corps of Engineers (USACE) offsite inspections protocol for identifying wetlands and waterbodies as described in the Corps of Engineers Wetlands Delineation Manual (Part IV, Section D, Subsection 1).

Wetlands and waterbodies identified in the desktop survey are listed in Section 5.1 of the Application. A field wetland delineation was not completed because the Project does not impact any wetlands that are jurisdictional to the USACE, therefore an USACE permit is not required. Conversion and construction of the remaining portion of the Project will not result in the permanent drainage or filling of wetlands or waterbodies.

d. Construction and environmental program plan

Response: The Project has been sited to avoid and minimize adverse environmental impacts. The scope of information sought by this request is unclear.

e. Erosion control plan

Response: Erosion will be controlled through the use of best management practices and implemented as part of the Project's storm water pollution prevention plan.

f. Storm water pollution prevention plan (SWPPP)

Response: In accordance with North Dakota Dept. of Environmental Quality requirements pertaining to North Dakota Pollutant Discharge Elimination System General Construction Stormwater Permit, a SWPPP will be completed prior to the start of construction activities. A copy of Bridger's NDPDES General Permit will be filed with the Commission when obtained.

- g. Migratory bird treaty act plan

Response: The Project has been sited to avoid and minimize adverse environmental impacts. As discussed in the Application, potential impacts to avian and raptor species were evaluated as part of the Project's environmental review and adverse impacts are not anticipated. The North Dakota Game and Fish (NDGF) agreed with this finding in correspondence dated May 14, 2020 in which the NDGF stated the Project is not anticipated to have adverse impacts on wildlife or wildlife habitat.

- h. Spill prevention and control plan

Response: See response to 27(a) above.

- i. Horizontal directional drilling inadvertent release control and mitigation contingency plan

Response: See response to 27(a) above.

- j. Weed management plan and the county specific weed management plan

Response: Per the request of McKenzie County, Bridger has adopted McKenzie County's Weed Management Plan. A copy of the plan is attached hereto.

- k. Dust control plan

Response: Best management practices will be employed as necessary to control dust emissions. Project related traffic speeds will be controlled on the construction right-of-way and along unimproved roads. Dust abatement techniques on unpaved or un-vegetated areas or other areas susceptible to wind erosion will be utilized as necessary and as determined by Bridger.

- l. Environmental training plan

Response: The Project has been sited to avoid and minimize adverse environmental impacts. Construction personnel will employ best management practices to minimize impacts during construction of the 2.4-mile segment of the Project. The scope of information sought by this request is unclear.

- m. Baseline soil analysis used for determining topsoil depth along the project route

Response: A baseline soil analysis study was not conducted for the Project. During construction of the 2.4-mile Project segment, topsoil depth will be assessed in-field by experienced construction personnel.

28. Send agency correspondence to the following agencies notifying them of the application, and file all correspondence:

Response: Copies of correspondence with the below-referenced agencies/entities are attached as Supplemental Application Exhibit C (containing Exhibits C.19 to C.30)

- **Exhibit C.19** ND Aeronautics Commission
- **Exhibit C.20** ND Attorney General
- **Exhibit C.21** ND Department of Human Services
- **Exhibit C.22** ND Labor Department
- **Exhibit C.23** ND Department of Career and Technical Education
- **Exhibit C.24** ND Department of Commerce
- **Exhibit C.25** ND Energy Development Impact Office
- **Exhibit C.26** ND Governor
- **Exhibit C.27** ND Indian Affairs Commission
- **Exhibit C.28** Job Service of ND
- **Exhibit C.29** Federal Aviation Administration
- **Exhibit C.30** ND State Historic Preservation Office

29. For all GIS layers that have been filed with the Commission, and for all GIS layers which may be filed with the Commission as an addition or supplement, provide a table matching the name on the source maps to the GIS file names for the following map sets:

- a. Appendix A, Exhibit A.1 to the application map set

Response: Updated GIS is submitted along with this filing.

- b. Appendix A, Exhibit A.2 to the application map set

Response: The Application does not contain an Appendix A, Exhibit A.2 map set.

- c. Appendix A of the Cultural Resource Report map set

Response: Due to the confidential nature of cultural resource information, this information is not being provided.

- d. Additional map sets filed, including any sets from a natural resource report

Response: There are no additional map sets.