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September 28, 2021

Via Electronic Mail & Hand Delivery

Mr. Steve Kahl
Executive Director
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480
ndpsc@nd.gov

**In re: Bridger Pipeline LLC
Johnson's Corner to Wilson Pipeline Project
Case No. PU-20-430
Our File No. 016265-000017**

Dear Mr. Kahl:

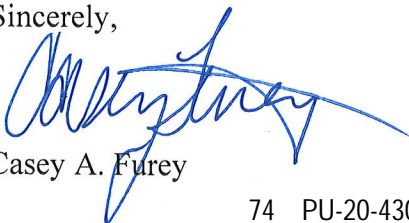
Enclosed for filing in the above-referenced matter, please find seven copies of the following:

1. Bridger Pipeline LLC's Certification Relating to Out of Corridor Route Adjustment Pursuant to N.D.C.C. § 49-22.1-15(3); and
2. Bridger Pipeline LLC's Addendum to Consolidated Application for Certificate of Corridor Compatibility & Route Permit Out of Corridor Adjustment.

Also enclosed is a USB drive containing the Shapefiles pertaining to the route adjustment.

Please feel free to contact me if you have any questions. Thank you.

Sincerely,



Casey A. Furey

CAF/lh
Enc.

74 PU-20-430 Filed 09/28/2021 Pages: 29
Certification and documentation for route adjustment under section N.D.C.C.49-22.1-15(3)
Bridger Pipeline LLC
Casey Furey, Crowley Fleck, PLLP

cc: Adam Renfandt (via email)

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

**Bridger Pipeline LLC
8" Crude Oil Pipeline – McKenzie County
Siting Application**

Case No. PU-20-430

**CERTIFICATION RELATING TO OUT OF CORRIDOR
ROUTE ADJUSTMENT PURSUANT TO N.D.C.C. § 49-22.1-15(3)**

DECLARATION OF ROBERT STAMP

I, Robert Stamp, pursuant to N.D.C.C. § 49-22.1-15(3), hereby declare as follows:

1. I am the Engineering Director for Bridger Pipeline LLC (“Bridger”). I am authorized to make this declaration on behalf of Bridger and have the authority to bind Bridger to the following.
2. On May 19, 2021, the North Dakota Public Service Commission (“Commission”) approved Finding of Fact, Conclusions of Law and Order in Case No. PU-20-430, Docket No. 67 (“Order”), issuing Certificate of Corridor Compatibility No. 221 and Route Permit No. 231 to Bridger for the construction and operation of an approximately 29.4 mile 8-inch diameter crude oil pipeline and associated facilities located in McKenzie County, North Dakota (the “Project”). The Project includes the conversion of an existing 27-mile-long crude oil gathering pipeline, and the construction of a new pipeline segment originally proposed to total 2.4-miles in length.
3. North Dakota Century Code Chapter 49-22.1 governs the procedure for adjusting a project route. North Dakota Century Code section 49-22.1-15(3) states:

Before or during construction, a utility, without any action by the commission, may adjust the route of a gas or liquid transmission line outside the designated corridor if, before conducting any construction activities associated with the adjustment, the utility:

- a. Files with the commission certification and supporting documentation that:
 - 1) The construction activities will not affect any known exclusion or avoidance areas;
 - 2) The route outside the corridor is no longer than one and one-half miles [2.41 kilometers];
 - 3) The utility will comply with the commission’s order, laws and rules designating the corridor and designation the route; and

- 4) Each owner of real property on which the adjustment is to be located and any applicable governmental entity with an interest in the same adjustment area do not oppose the adjustment.
 - b. Files detailed field studies indicating exclusion and avoidance areas for an area encompassing the route outside the designated corridor equal to the length of the adjustment of the proposed corridor.
4. Upon issuance of the Order, Bridger further refined the Project's route to minimize new pipeline construction and installation. As originally proposed, the Project's new pipeline segment consisted of 2.4-miles of additional pipeline originating at the Johnson's Corner Terminal and extending to tie-in to the Project's existing 27-mile Kermit to Wilson pipeline segment.
5. Pursuant to the statutory certification procedure set forth above, Bridger proposes to adjust the Project route in one location prior to construction, and outside of the Commission approved Project corridor. *See* Order, Ordering Provision No. 2 ("designating a corridor generally 300-foot-wide for the construction, operation, and maintenance" of the Project). Specifically, Bridger proposes to adjust the 2.4-mile route segment extending from Johnson's Corner to the Kermit to Wilson pipeline tie-in, as more particularly depicted on the enclosed map set. *See* Exhibit A map set to the attached Addendum. The proposed adjustment reduces the amount of new construction needed to connect the Project to existing facilities. The proposed 2.4-mile new pipeline route is subsequently replaced by the 1.3-mile pipeline route adjustment referenced herein.
6. In August 2021, Bridger, through its consultants, conducted additional environmental, wildlife, and cultural resource studies and surveys to analyze the potential impacts of the route adjustment pursuant to the Commission's designated Avoidance and Exclusion Areas (N.D. Admin. Code § 69-06-08-02). An Addendum detailing these findings and Project maps depicting the location of the route adjustment are attached hereto.
7. The analysis did not identify Avoidance or Exclusion Areas crossed by the adjusted route or located within the modified corridor. Pursuant to N.D.C.C. § 49-22.1-15(3)(a)(1), construction activities for the adjustment will not affect any known Avoidance or Exclusion Areas.
8. The route adjustment outside of the approved corridor is no longer than one and one-half miles and extends a total of 1.3-miles outside of the approved corridor. N.D.C.C. § 49-22.1-15(3)(a)(2).
9. Bridger will continue to comply with the Commission's Order, laws, and rules designating the Project's corridor and route. N.D.C.C. § 49-22.1-15(3)(a)(3).

10. Bridger has discussed the route adjustment with the applicable landowner. The owner of real property on which the adjustment is located does not oppose the adjustment. Bridger is not aware of any applicable governmental entity with a property interest in the same adjustment area, nor that opposes the adjustment. N.D.C.C. § 49-22.1-15(3)(a)(4).
11. Concurrence from the State Historical Society of North Dakota regarding Bridger's Supplemental Class III Cultural Resource Inventory for the route adjustment will be filed with the Commissioning prior to commencing construction of the route adjustment.
12. I declare, under the penalty of perjury under the law of North Dakota, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

Signed on the 24th day of September 2021, at Natrona County, Wyoming , United States of America.



Robert Stamp
Engineering Director
Bridger Pipeline LLC

8-inch Johnson's Corner to Wilson Crude Oil Pipeline

McKenzie County

Case No. PU-20-430

Addendum to: Consolidated Application for
Certificate of Corridor Compatibility & Route Permit
Out of Corridor Route Adjustment



Bridger Pipeline LLC
455 North Poplar Street
Casper, Wyoming 82602

September 2021

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Exhibit A: Project Route Maps

- A.1: Aerial Mapbook
- A.2: Topographic Mapbook

INTRODUCTION

Bridger Pipeline LLC (Bridger), submitted a single consolidated application for a Certificate of Corridor Compatibility and Route Permit to the North Dakota Public Service Commission (NDPSC) for the approximate 29.4-mile Johnson's Corner to Wilson Pipeline (Project) in Case No. PU-20-430 (Docket No. 1). The Project consists of two parts, the conversion of a 27-mile existing gathering line, and the construction of new pipeline originally proposed to total approximately 2.4 miles. The Project is located within McKenzie County in North Dakota. The Project will transport crude oil from Eighty-Eight Oil Company, LLC's (EEOC) existing Johnson's Corner Terminal in North Dakota to Bridger's existing Wilson Station approximately 7 miles south of Watford City, North Dakota.

The NDPSC issued Bridger Certificate of Corridor Compatibility No. 221 and Route Permit No. 231 for the Project on May 19, 2021.

The Project is located directly upstream of the Wilson to Bowline Pipeline owned and operated by Belle Fourche Pipeline Company, a company affiliated by common ownership with Bridger, and sited by the NDPSC in Case No. PU-18-404.

After the Certificate and Permit were issued, Bridger evaluated the feasibility of a route adjustment to further refine the Project's route to minimize construction of additional pipeline. As originally proposed, the segment of pipeline to be constructed totaled 2.4 miles. This Addendum discusses the Project's proposed reroute, which minimizes the amount of construction required, and totals 1.3 miles in length. The reroute requires construction outside the previously approved corridor. The reroute is located in T150N R95W Sections 19 & 20 and T150N R96W Section 25.

The Project reroute is submitted in accordance with Chapter 49-22.1 and Section 69-06-08-02 of the North Dakota Administrative Code and the NDPSC's Energy Conversion and Transmission Facility Siting Guidelines.

1 DESCRIPTION OF PROPOSED REROUTE

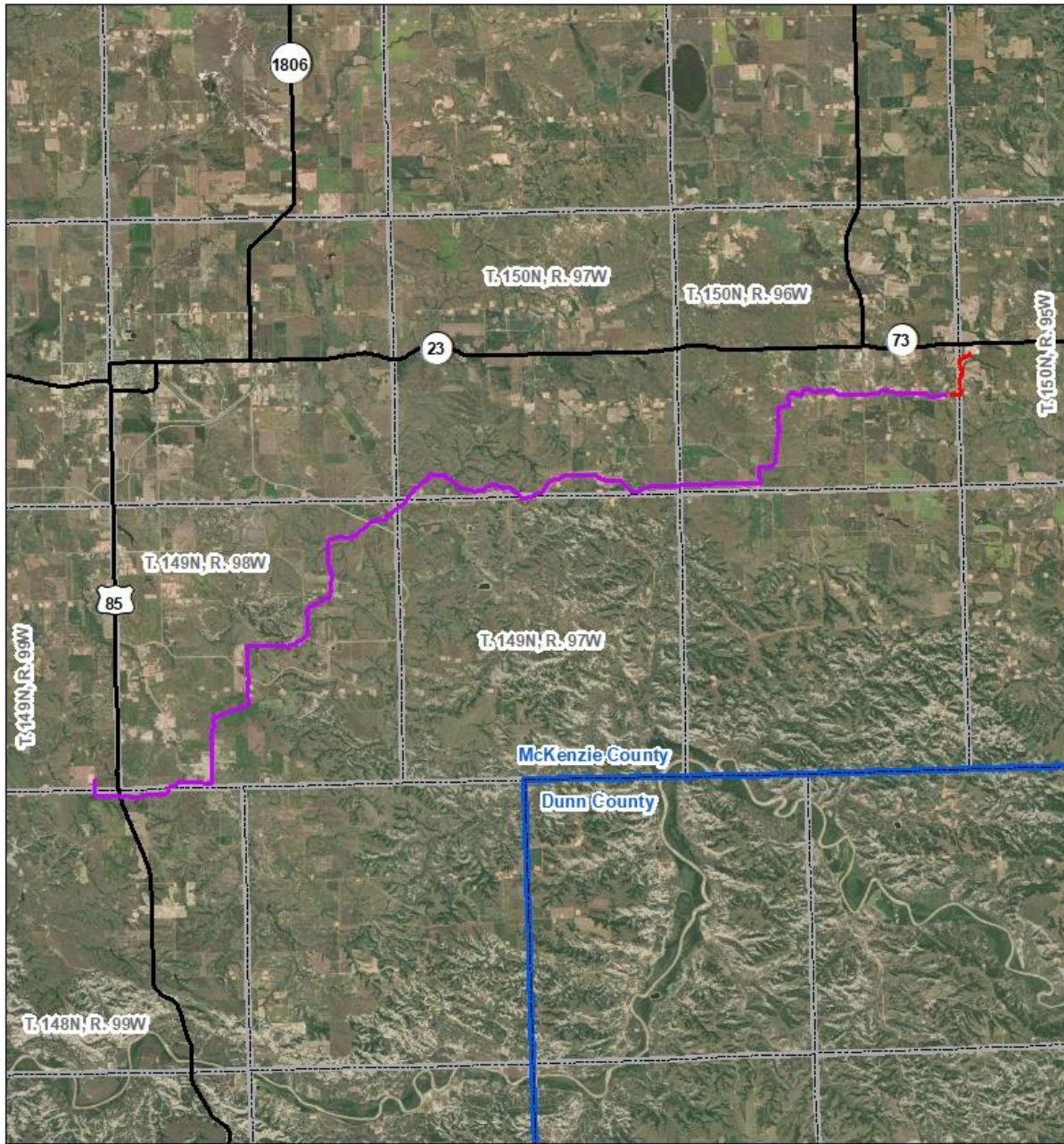
1.1 Length









The Project reroute will involve approximately 1.3 miles of pipe installation and is located approximately one-half (0.5) mile from the original route. The reroute pertains to the entire unconstructed portion of the Project.

1.2 Aboveground Facilities

There will be no new aboveground facilities associated with the reroute.

Figure 1 – General Project Location Map



Johnson's Corner to Wilson Station		  
 Proposed Pipeline  Proposed Pipeline Conversion  Highway	 Township/Range Boundary  County Boundary	

2 DESIGN OF THE PROPOSED FACILITY

2.1 Design

The reroute is a 1.3 mile 8-inch diameter crude oil transmission pipeline extending from the Johnson's Corner Terminal to Kermit to Wilson pipeline tie-in. The steel pipe utilized for construction of the Project will meet US DOT criteria outlined in 49 C.F.R. § 195.100. The Project will be constructed per 49 C.F.R. § 195.200 and will be operated and maintained per 49 C.F.R. § 195.400.

2.2 Purpose and Need of the Facility

As previously explained in the Project Application (Docket No. 1), the purpose of the Project is to transport crude oil produced in western and northwestern North Dakota to the Wilson Station near Watford City, North Dakota eventually connecting into the Guernsey, Wyoming market for further marketing and transportation nationally.

The Project will provide needed capacity to transport increased petroleum from western North Dakota where oil production is expected to increase until 2025¹.

The Project will add: (1) additional pipeline shipping capacity in North Dakota; (2) more access to liquid market options for Bridger customers, specifically the oil trading center in Cushing, Oklahoma; and (3) a pipeline transportation alternative to trucking or railing crude oil to other shipping points and markets. This pipeline segment will be a vital part of an alternative route out of North Dakota in the event of a shutdown of the other pipelines leaving the Williston Basin.

2.3 General Area to be Served

The reroute does not impact the area originally proposed to be served. The Project will continue to provide needed capacity to transport increased petroleum from western North Dakota where oil production is expected to increase until 2025.

2.4 Capacity

The installed capacity of the Project will remain up to 50,000 barrels per day.

2.5 Technology to be Deployed/Employed

The Project will continue to be designed, constructed, maintained, and inspected to the US DOT Pipeline and Hazardous Materials Safety Administration (PHMSA) regulations utilizing industry standards and company policies. The system will be controlled and monitored 24 hours a day, 7 days a week, and 365 days a year by trained control room personnel. Additionally, the system will be equipped with a monitoring and alarm system that continuously monitors the flow and pressure of the system and readily signifies anything outside normal operating conditions.

¹ U.S. Energy Information Administration, "U.S. Crude Oil Production to 2025: Updated Projection of Crude Types," *available at* <https://www.eia.gov/analysis/petroleum/crudetypes/pdf/crudetypes.pdf> (accessed February 28, 2020).

2.6 Product

The Project will transport crude oil produced from the Bakken/Three Forks Formation as originally proposed. As a crude oil transmission facility, the Project will provide needed flexibility and capacity to transport petroleum crude oil from western North Dakota.

2.7 Final Destination of Product

The reroute does not impact the Project's final destination. Discussion in Project Application (Docket No. 1) Section 2.7 remains applicable. The Project will transport crude oil produced from western and northwestern North Dakota eventually connecting into the Guernsey, Wyoming market for further marketing and transportation nationally. Markets served will be refineries in Utah, Wyoming and Colorado along with trading centers in Cushing, Oklahoma and Patoka, Illinois.

2.8 Width of Right-of-Way (ROW)

The reroute construction ROW remains approximately 100 feet wide. Additional temporary work space may be necessary during construction, maintenance, and inspection in areas such as steep slopes, and areas adjacent to streams and road crossings, for safety reasons, and construction activities associated with these features.

Bridger will notify landowners of normal operating modifications or maintenance to the Project that is carried out within the 50-foot permanent ROW. The width of the ROW was established based on the need to provide adequate space and line separation for construction and future line maintenance.

2.9 Estimated Distance between Surface Structures for Pipeline Facilities

The Project remains largely underground. Unlike electrical transmission lines, no major features of this system will be installed aboveground. Aboveground features, for the reroute, will be limited to minor features such as to pipeline markers and rectifier sites. Operation and maintenance buildings are currently located at EEOC's Johnson's Corner Terminal.

2.10 Maximum Design Operating Pressure and Temperature for Pipeline Facilities

The reroute will not impact the Project's design and operation parameters. The maximum allowable operating pressure of the pipeline will be 1440 psig. The maximum operating temperature of the Project will be 100 degrees Fahrenheit. Preferred Location of Facility

The Project reroute is located in McKenzie County. The Project reroute originates at the Johnson's Corner Terminal in McKenzie County, and runs 1.3 miles outside of the existing Project corridor to Bridger's Kermit to Wilson Pipeline tie-in (see Exhibit A map).

2.11 Preferred Location of Corridor

The Project reroute reduces potential environmental impact by 1.1 mile. Underground pipelines minimize potential impacts on human and animal welfare. Construction of the reroute is expected to cause short term disruption to the environment, but will not result in long-term changes to the environment.

2.12 Description of ROW Preparation, Construction, and Reclamation Procedures

The construction ROW will be cleared, grubbed, and graded to allow for pipeline construction. Soil segregation will be completed to standard operating procedures. All trenching will be performed mechanically with either an excavator or a ditching machine to a depth allowing a minimum of four feet from the top of the pipe to the top of the cover. When rock is present, an excavator with rock teeth will be used. Boring and horizontal directional drilling (HDD) pipe installation will be performed if crossing under a road, railroad, pipeline/utility, waterbody, or areas where trenching is deemed unsafe or impractical. Casing of the pipelines will not be used because it leads to corrosion issues. Typically, the ROW will be continuously cleared of all construction material, uncovered rocks, and compacted areas. Holes and ruts will be filled and graded. Reclamation of the ROW will be completed at the end of the pipeline construction.

No additional short-term or long-term impacts are associated with the Project reroute.

2.13 Landowner Notification, Easement Acquisition, and Compensation

Bridger has discussed the reroute with applicable landowners and secured easement agreements with all landowners along the Project reroute.

Bridger is committed to providing landowners complete information about the pipeline and associated facilities and keeping them informed throughout the lifetime of the Project. Bridger will coordinate with landowners to discuss crop loss payments, and to address any unique property concerns, as needed.

2.14 Starting Construction

Construction is expected to begin 4th quarter 2021.

2.15 Completing Construction

Construction for the reroute is anticipated to last approximately one month after construction begins.

2.16 Testing Operations

The pipeline will be hydro-tested in accordance with PHMSA part 195 regulations prior to being placed into service. Test operations will occur following construction of the Project.

2.17 Commencing Operations

Bridger anticipates placing the pipeline in service by the beginning of 2022 or as soon as construction and testing are complete.

3 ENVIRONMENTAL STUDIES

Section 3 pertains to the Project reroute and discusses additional studies conducted for areas not previously studied or surveyed.

Studies were undertaken to evaluate the reroute's potential impacts on recreational, environmental, and cultural resources. Environmental data collected to date includes information on soils, land use, wetland and water body crossings, protected species, and cultural resources.

Analysis of the Project reroute entailed both desktop studies and field surveys. A one-mile-wide study corridor was utilized for the entire 1.3-mile reroute in North Dakota (Study Area). Desktop studies for the Study Area included a Class I archeological file search and a wildlife database search. Surveys were conducted along the entire reroute in the field on foot within the generally 300-foot-wide Project Corridor depicted in Exhibit A (Survey Area), and over larger areas as specified herein.

Bridger engaged Keitu Engineers & Consultants, Inc. (Keitu) and Beaver Creek Archaeology, Inc. (BCA) to perform the environmental and cultural resource siting studies for the Project.

BCA performed a Class I archeological file search in August 2021 of the Study Area. A Class III field survey was performed on the Survey Area in August of 2021. There were no cultural resource locations located within the reroute Survey Area.

In August of 2021, Keitu conducted plant life field surveys within the Survey Area and wildlife and habitat field surveys within the one-mile wide Study Area to identify and assess the presence of wildlife and habitat for threatened and endangered species.

Keitu conducted a database search for all other Exclusion or Avoidance Criteria outlined in the North Dakota Administrative Code within the Study Area. Items reviewed included federal, state, and county parks, protected and sensitive plants and animals, and civil and social structures such as recreational areas, businesses, rural homes, and farmsteads.

3.1 Wetland and Waterbody Inventory

Bridger, through its consultants, conducted a desktop survey using aerial photographs, U.S. Geological Survey (USGS) topographic maps, and the U.S. Fish & Wildlife Service (USFWS) National Wetland Inventory to identify wetlands within the reroute Project Corridor.

U.S. Army Corps of Engineers (USACE) permitting for waterbody crossings is not required for the Project.

With respect to wetlands and waterbodies non-jurisdictional to USACE, the reroute crosses one unnamed creek and no other wetland or waterbodies according to the USFWS National Wetland Inventory most recent information.

Construction of the Project reroute will not result in the permanent drainage or filling of wetlands or waterbodies. Bridger previously has and will continue to HDD any waterbodies with standing water in the Project Corridor.

3.2 Vegetation Inventory

Botany surveys were performed along the rerouted Survey Area in McKenzie County in August 2021. One surveyor conducted a thorough inspection of private land, which consisted of cropland, rangeland, and pastureland.

No sensitive, threatened, or endangered plant species were detected in the Survey Area.

3.3 Wildlife Inventory

Investigations were conducted to assess potential impacts of the Project reroute upon wildlife. Prior to field surveys, information was gathered from a variety of sources to compile data on the existing status of wildlife within the Survey Area. Prior to field surveys, Keitu reviewed in-house GIS data that includes information updated annually from the U.S. Forest Service (USFS), USFWS, and NDGF on known locations of sensitive species. Field surveys were conducted on the Study Area via foot and via all-terrain vehicle. Field data was collected with a Trimble GEOXH 6000 GPS.

As discussed in the Project Application (Docket No. 1), an aerial raptor and nest survey was previously conducted for the Project on January 20 and 21, 2020, which included the area of the Project reroute. During the aerial survey, three surveyors (seated in front-left, rear-left, and rear-right positions of the helicopter) thoroughly examined the area within a 2-mile-wide survey corridor of the Project to locate raptors and raptor nests. The survey methods were consistent with the USFWS survey protocols. Complete survey coverage was obtained by traversing the survey corridor focusing on areas likely to contain nests including woody draws and steep bluff faces while visually scanning all areas of potential nesting habitat. Locations of NDGF and USFS shapefiles depicting previously known raptor nests were also focused on. When a possible nest was discovered, the helicopter would slow to a hover, at a distance great enough to prevent flushing if the nest was occupied and in the shortest amount of time needed to determine condition, type of nest, contents, and obtain accurate GPS location coordinates. The timing of the survey was conducive to locating nests in deciduous trees as "leaf out" had not occurred at this time.

No occupied or unoccupied nests were found in the reroute area during the survey. No raptor species of concern were observed during the survey. However, if an occupied nest is spotted during construction, a construction buffer zone will be implemented. The length of the buffer zone will be dependent on the species identified, consistent with USFWS guidance.

3.4 Exclusion Areas

Exclusion Areas are geographic areas that must be excluded in the consideration of a route for a transmission facility. A corridor may contain an Exclusion Area; however, Exclusion Areas may not encompass more than 50 percent of the Project corridor width at any point, unless there is no reasonable alternative.

No Exclusion Areas were identified within the reroute Project Corridor.

3.5 Federally Protected Species Review

Keitu reviewed and assessed NDGF, USFWS, and the NDPRD NHI references to identify species and ecologically significant habitats within the Project Corridor. Resources were reviewed for federally listed endangered, threatened, candidate, sensitive, or watch species, state-listed protected species, and critical habitat located within the Project Corridor.

Additional Comments

Field surveys were conducted in August of 2021 of the Survey Area for botany and in the one-mile Study Area for wildlife. No sensitive wildlife or botany issues were identified in the Study Area. No threatened or endangered species were found during field surveys and no designated critical habitat is located in the Study Area. The results of this field survey are presented in the Project Application (Docket No. 1) and Sections 3.2 and 3.3 of this Addendum.

3.6 Areas Where Unique or Rare Species Would Be Irreversibly Damaged

Based upon field surveys and review by Keitu biologists, the proposed reroute will not result in irreversible impacts that are detrimental to sensitive plant and animal species or their habitats.

3.7 Areas within 1,200 Ft of ICBM Facility or 30 Ft of Direct Line of IBM Launch Facility

Based on available information, the Air Force has no Intercontinental Ballistic Missile (ICBM) launch or launch control assets within the Project reroute area.

3.8 Avoidance Areas

Avoidance Areas are areas that may not be considered in the routing of a transmission facility unless it is shown that there is no reasonable alternative under the circumstances. A buffer zone of a reasonable width to protect the area must be included. A corridor may contain Avoidance Areas as long as the Avoidance Areas do not encompass more than 50 percent of the Project Corridor width at any point, unless no reasonable alternative exists.

No Avoidance Areas were identified within the reroute Project Corridor.

3.9 Federal Resource Review

A review of public available data and field studies of the reroute Project Corridor was conducted and confirmed the absence of designated or registered national historic districts, wildlife areas, wild, scenic or recreational rivers, and wildlife refuges within the reroute Project Corridor or crossed by the Project reroute.

3.10 State Resource Review

A review of publicly available information was conducted and confirmed the absence of designated or registered state wild, scenic, or recreational rivers, forests, forest management lands, or grasslands within the reroute Project Corridor or crossed by the Project reroute.

3.11 Local Resource Review

A review of publicly available information was conducted and confirmed the absence of designated or registered local (municipal and county) parks and recreational areas within the reroute Project Corridor or crossed by the Project reroute.

3.12 Historical Resources Not Designated as Exclusion/Avoidance Areas

Keitu has hired BCA on behalf of Bridger to conduct a Class I file search, a Class III intensive cultural resource inventory, and cultural resource survey report for submittal to the North Dakota State Historic Preservation Office (SHPO). The cultural resource survey area consists of the reroute Project Corridor depicted in the attached Exhibit A map.

During the pedestrian survey, no cultural resources were encountered and recorded within the reroute Project Corridor, BCA recommends a finding of No Historic Properties Affected for this reroute as currently planned. The Class III Cultural Resource Inventory addendum report has been submitted to SHPO. A copy of SHPO's response will be filed with the Commission prior to construction.

3.13 Geologically Unstable Areas

No areas are within the reroute Project Corridor.

3.14 Areas within 500 Feet of a Residence, School, or Place of Business

There are no inhabited residences within five hundred feet of the Project reroute.

3.15 Reservoirs and Municipal Water Supplies

The reroute does not cross any reservoirs or municipal water sources. The reroute will not adversely affect any reservoirs or municipal water supplies.

3.16 Water Sources for Organized Rural Water Districts

This reroute is not expected to impact North Dakota ground water quality.

3.17 Irrigated Land

The reroute will not impact irrigated lands. A desktop survey of Google Earth and field survey confirms the absence of irrigated lands within the Survey Area.

3.18 Areas of Recreational Significance but Not Designated Exclusion Areas

Areas of recreational significance are not located within the reroute Project Corridor or crossed by the Project Route.

3.19 Selection Criteria

The NDPSC's rules specify Selection Criteria to be considered in designating a pipeline corridor or route. Specifically, the NDPSC considers whether adverse effects from the location, construction, and maintenance of the facility as they relate to these criteria, will be at an acceptable minimum, and whether these effects will be managed and maintained at an acceptable minimum.

The Selection Criteria that were considered for the Project include:

- Agricultural Production
- Family Farms and Ranches
- Land Suitable for Irrigation
- Surface Drainage and Groundwater Flow Patterns
- Sound Sensitive Areas
- Visual Effects
- Extractive and Storage Resources
- Wetlands, Woodlands, and Wooded Areas
- Communication or Electric Control Facilities
- Human Health and Safety
- Animal Health and Safety
- Plant Life

The following sections discuss the potential impacts and measures to avoid or minimize the impacts related to each of the Selection Criteria.

3.19.1 Agricultural Impacts

A rerouted portion of the Project (1.3 miles) will be installed within a new ROW in McKenzie County in northwestern North Dakota. A significant portion of the reroute crosses agricultural and pasture lands where crop and livestock production are the extensive economic activity. Land use along the entire reroute is comprised of approximately 1 mile of agricultural land and .1 miles pasture or rangeland. The primary crops cultivated in the area include hay fields, oats, sunflowers, and alfalfa.

Pipeline construction may result in minimal temporary effects on agricultural land use. However, Bridger will institute appropriate management practices to restore all areas to pre-construction conditions, to the extent reasonably practicable.

Bridger will require that construction equipment be cleaned before arriving on site to prevent the introduction of undesirable species to the surrounding ROW. Bridger will implement the mitigation measures discussed in Project Application (Docket No. 1) Section 5.19.1 if undesirable species are found within the construction ROW.

The reroute will be installed at a depth that exceeds the typical tillage depth. Following construction, agricultural lands will be returned to pre-construction conditions to the extent reasonably practicable. Therefore, the Project is not anticipated to interfere with normal agricultural operations on cropland after construction. Construction operations are expected to be conducted after the harvest season and prior to the growing season when feasible. Therefore, minimal disruption to agricultural production is anticipated.

The reroute will not result in additional above-ground facilities beyond those previously identified for the Project. Therefore, the reroute will result in minimal long-term loss of farmland use. Bridger will consult with landowners to place above-ground appurtenances in areas that cause the least amount of disturbance to landowner operations. Landowners will be compensated by either long-term lease agreements or by the purchase of the land for these sites.

Prime farmland is not located within the reroute Project Corridor.

The reroute will not generate negative effects for agricultural land use such as landscape modifications or an introduction of noxious weeds or invasive species when agricultural areas are reclaimed. Bridger will continue to implement mitigation post project construction as discussed in the Project Application.

3.19.2 Family Farms and Ranches

The construction activity will not alter the patterns of landownership or create long-term disruptions of family farming operations. The construction zone will be located in the northern 1.3 miles of the total line. Bridger's crop loss compensation program will compensate landowners if any crop damage were to occur during construction. Crop damage resulting from future pipeline maintenance and repairs will also be addressed by Bridger. All maintenance equipment used will be limited to access routes in agreement with the landowners to minimize disruption to soil, drainage, and crops.

Construction of the Project will continue to have maintenance activity required, which could have an indirect short-term disruption to livestock operations, and inconvenience to farm activities. Bridger will work to minimize interference while in operation.

3.19.3 Land Suitable for Irrigation

No aboveground irrigation systems were identified along the reroute. No Landowners identified irrigation systems on their properties.

3.19.4 Surface Drainage and Groundwater Flow Patterns

Because the Project consists almost exclusively of underground pipe, the reroute will not alter surface drainage patterns. Discussion in Project Application (Docket No. 1) Section 5.19.4 remains applicable. The reroute will not have any measurable impact on the average flow rate nor pattern of groundwater flow.

3.19.5 Sound-Sensitive Land Uses

There are no inhabited residences located within 500 feet of the reroute.

3.19.6 Visual Effect on Adjacent Areas

Other than pipeline marker there will be no permanent above-ground facilities. The reroutes impact to visual resources will be limited to periods of construction activities.

3.19.7 Extractive and Storage Resources

No extractive or storage resources were identified which would be affected by the reroute. Due to the narrow and linear nature of the Project, future extractive development will not be substantially affected by the Project.

3.19.8 Wetlands, Woodlands, and Wooded Areas

Bridger, through its consultants, conducted a desktop survey using aerial photographs and USGS topographic maps identifying wetlands along the reroute Project Corridor.

No wetlands or waterbodies will be permanently drained or filled as part of the reroute, and no future effects are anticipated. Construction of the reroute will not result in the permanent drainage or filling of wetlands.

No fertilizer, lime, or mulch would be applied in wetlands as part of the reroute. The long-term operation and maintenance of the pipeline will not have adverse effects on wetland function or value as all features through wetlands are underground.

During Keitu's surveys, 4 upland tree areas were geographically referenced within the 1.3-mile rerouted construction Survey Area. Keitu recorded all trees with a diameter breast height of 1-inch or greater. It was determined that approximately 3500 trees, saplings, or shrubs are located within the Survey Area.

Tree rows and woody areas occur in limited amounts, as isolated islands or rows throughout the Project area. The reroute crosses through wooded areas on rangeland. Wooded habitat provides shelter and safety for a number of wildlife species. Impacts to trees will continue to be avoided to the extent practicable compatible with safe operation, maintenance, and inspection of the pipeline.

It may become necessary to clear some mature trees during construction. If impacts to trees and shrubs cannot be avoided, Bridger will submit a Tree and Shrub Mitigation Plan for Commission review and approval. Bridger will work with the appropriate state agencies and private landowners to determine appropriate replacement measures following construction, and will satisfy the tree replacement requirements set forth in the Project's Tree and Shrub Mitigation Specifications.

3.19.9 Radio and TV Reception and Other Communication or Electronic Facilities

No impacts on television or radio reception or communication or electronic control facilities are anticipated as a result of the reroute.

3.19.10 Human Health and Safety

Bridger Pipeline LLC is part of the True Companies of Casper, Wyoming operating in western North Dakota, eastern Montana and Wyoming. By building and operating this extensive network, Bridger has become one of the largest pipeline companies in North Dakota and is very experienced in managing construction and operating pipeline systems that protect the public's health and safety.

3.19.11 Animal Health and Safety

Discussion in Project Application (Docket No. 1) Section 5.19.11 remains applicable. However, temporary impacts are anticipated to be further minimized because the reroute reduces the area to be disturbed during construction.

3.19.12 Plant Life

The reroute is not anticipated to permanently impact plant life and reduces the overall area originally proposed to be disturbed. In areas where vegetation has to be removed to perform inspection or maintenance activities, vegetation will be reestablished to regulation standards from county agencies and the satisfaction of landowners. Permanent impacts on vegetation are not anticipated.

3.20 Policy Criteria

3.20.1 Location and Design

Bridger believes that the Project utilizes an optimal alignment, the reroute reduces the length of new pipeline to be constructed and installed by 1.1 mile.

Construction of the Project will involve the installation of 8-inch nominal diameter, steel, API-5L, PSL2, Grade X-52 ERW Line Pipe with a nominal wall thickness of 0.31 inches. Bore pipe will have a nominal wall thickness of 0.5 inches.

The reroute will not require construction of additional valves beyond those previously identified.

The Project is designed and will be operated in a manner that meets or exceeds state and federal engineering, safety and operational design standards.

3.20.2 Training and Utilization of In-State Labor

Discussion in Project Application (Docket No. 1) Section 5.20.2 remains applicable.

3.20.3 Economies of Construction and Operation

The reroute is believed to be the most cost-effective and operationally sound means of meeting Bridger's delivery obligations.

3.20.4 Use of Citizen Coordinating Committees

The reroute did not involve the use of a Citizen Coordinating Committee.

3.20.5 Commitment of Portion of Transmitted Product for Use In-State

Bridger does not own any of the crude petroleum transported in its pipeline system and does not determine markets or destinations for petroleum commodities.

3.20.6 Labor Relations

The reroute will have no anticipated effect on labor relations within North Dakota.

3.20.7 Coordination of Facilities

The reroute will not impact the Project's coordination with other facilities. The Project and associated pumping, control and operating systems will continue to be used in conjunction with other segments of the Bridger pipeline network to optimize system capacity.

3.20.8 Monitoring Impacts

Any construction-related impacts will be mitigated through the use of best management practices, appropriate construction techniques, and environmental inspection during and following completion of construction. Following construction, a thorough inspection will be performed to ensure restoration efforts were successful. Monitoring and treatment of noxious weeds and/or invasive species will be conducted on an annual basis to ensure a high degree of control and maximize treatment effectiveness.

3.20.9 Using Existing and Proposed ROWs and Corridors

Bridger consulted with applicable landowners regarding the reroute. The reroute will be constructed in a 100-foot wide temporary construction ROW. Bridger has acquired 50-foot wide permanent easements for the Project.

Bridger will acquire the right to utilize additional temporary workspace from the landowners, where necessary. The use of unauthorized workspace will be prohibited without the landowner's approval. In all cases, the amount of additional temporary workspace utilized will be kept to the minimum necessary to safely conduct work.

3.20.10 Other Existing or Proposed Transmission Facilities

Drilling activity in the service area of the pipeline has declined under current market conditions and as other areas in the state are currently more profitable. However, as oil prices have recovered from 2020 lows, production is expected to return to growth mode within 2 years. Bridger continues to evaluate the need for additional transmission facilities within the region and will pursue development as needed.

4 OTHER FACTORS CONSIDERED

4.1 Public Health, Welfare, Natural Resources, and the Environment

Keitu conducted field surveys within a 300-foot-wide survey botany corridor and a one-mile wide wildlife and habitat corridor in August 2021, to identify presence of wildlife and habitat assessment that covered threatened and endangered species, a tree, sapling, and shrub enumeration survey, and a noxious weed survey were also conducted by Keitu. A Class III Cultural Resource Inventory was conducted in August 2021.

4.2 New Transmission Tech to Minimize Adverse Environmental Effects

Discussion in Project Application (Docket No. 1) Section 7.2 remains applicable.

4.3 Beneficial Uses of Waste Energy from a Proposed Energy Conversion Facility

The reroute does not involve new energy conversion facilities; no usable waste energy will result from the Project.

4.4 Unavoidable Adverse Direct and Indirect Environmental Effects

Unavoidable adverse direct and indirect environmental effects of the 1.3 miles of construction for the reroute include temporary construction-related effects on vegetation, wildlife, agricultural operations, transportation, and noise levels as described throughout the Project Application and this Addendum. Impacts to agricultural operations are anticipated to be minimal and impacts to transportation are anticipated to be short-term. Impacts on vegetation and wildlife will also be minimal. Vegetation will be removed from the ROW prior to construction, and the area will be restored and re-seeded following construction. Wildlife may temporarily avoid the ROW during construction, but no long-term impacts are anticipated. Noise level increases are associated only with construction. In addition, Bridger implements thorough mitigation measures to minimize construction-related impacts.

4.5 Corridor or Route Alternatives Developed During the Hearing that Minimize Adverse Effects

The reroute was selected based on the best routing option for Bridger and landowners. Keitu conducted field surveys across the entire reroute Project Corridor (see Exhibit A map) to determine the potential presence and extent of wetlands and water bodies. Concurrently with the wetland/water-body determinations, Keitu conducted a wildlife survey and habitat assessment that covered threatened and endangered species; a tree, sapling, and shrub enumeration survey; and a noxious weed survey. All studies were done to select the route which would minimize adverse effects.

4.6 Irreversible and Irretrievable Commitments of Natural Resources if Designated

Bridger is not aware of any irreversible or irretrievable commitments of natural resources that would result from the reroute.

4.7 Direct and Indirect Economic Impacts of the Facility

Upon completion, the Project will present an optimization of new and existing pipeline capacity to meet the need for additional liquid petroleum transportation to the region. Discussion in Project Application (Docket No. 1) Section 7.7 remains applicable.

4.8 Existing Plans for Other Developments in the Vicinity

Bridger is not aware of any other development by state, local or governmental entities at or in the vicinity of the reroute Project Corridor.

4.9 Effect of the Proposed Route on Existing Scenic Areas, Historic Sites, Structures, & etc.

Bridger will adhere to the BCA proposed recommendations and all avoidance measures. BCA recommends a finding of *No Historic Properties Adversely Affected*. The SHPO is in the process of reviewing the addendum for the reroute on the Class I and Class III Inventory Reports. Section 3 describes BCA's findings and a copy of BCA's report is presented in Exhibit B.

4.10 Effect of the Proposed Reroute on Areas Unique Because of Biological Wealth or Rare/Endangered Species Habitat

Studies have been completed to identify species and ecologically significant habitats within the reroute Project corridor.

A field survey was conducted in August 2021 on the Survey Area for botany and a one-mile survey corridor for wildlife. No sensitive wildlife or botany issues were identified within the survey areas.

4.11 Problems Raised by Federal, State, and Local Agencies

No problems or concerns have been raised by commenters or identified by Bridger, or its consultants.

4.12 Policies and Commitments to Limit Environmental Impact

Discussion in Project Application (Docket No. 1) Section 7.12 remains applicable.

5 MITIGATION MEASURES

5.1 Measures to Preserve the Human Environment

Discussion in Project Application (Docket 1) Section 8.1 remains applicable.

5.2 Measures to Protect Terrain and Geological Resources

Discussion in Project Application (Docket No. 1) Section 8.2 and supporting filings remains applicable.

5.3 Measures to Protect Soils

Discussion in Project Application (Docket No. 1) Section 8.3 remains applicable.

5.4 Measures to Protect Vegetation and Wildlife

Discussion in Project Application (Docket No. 1) Section 8.4 remains applicable.

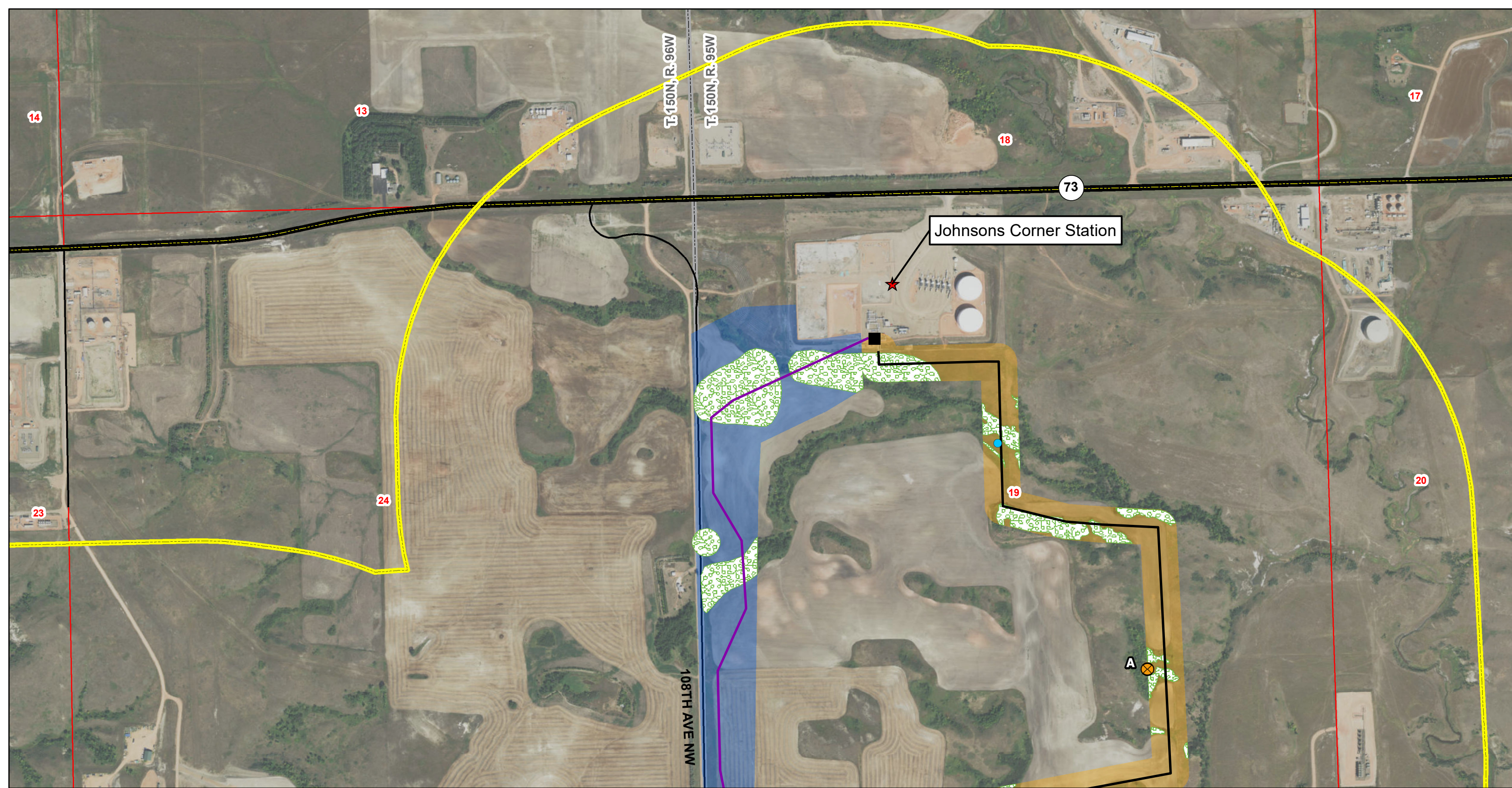
5.5 Measures to Protect Land Use Permits

The reroute does not require any additional county permits or approvals. Bridger will obtain and comply with applicable county permits regulating zoning and land use for any necessary maintenance or future construction activities.

6 DEVELOPMENT

6.1 Present and Future Natural Resource Development in the Area

Bridger is not aware of any current or future developments of natural resources in the area that would affect the reroute.



Johnson's Corner to Wilson Station

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|---------------------------------|-------------------------------------|------------------------------|-----------------------|---------------------------|
| ★ Facility | — Rerouted Non-Constructed Pipeline | — Highway | □ 1mile Study Area | □ Township/Range Boundary |
| ■ Block Valve | — Constructed Pipeline | — Roads | ▨ ND Trust Lands | □ Section Boundary |
| ● Wetlands | — Original Route Pipeline | ■ Rerouted Pipeline Corridor | ▨ National Grasslands | |
| ● Noxious Weeds | — Named Streams | ■ Original Pipeline Corridor | ▨ Woody Vegetation | |
| ⊗ Potential Area of Instability | | | | |

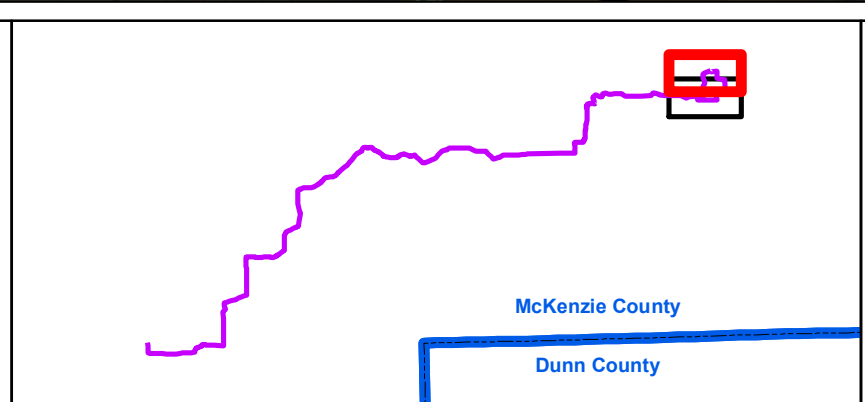
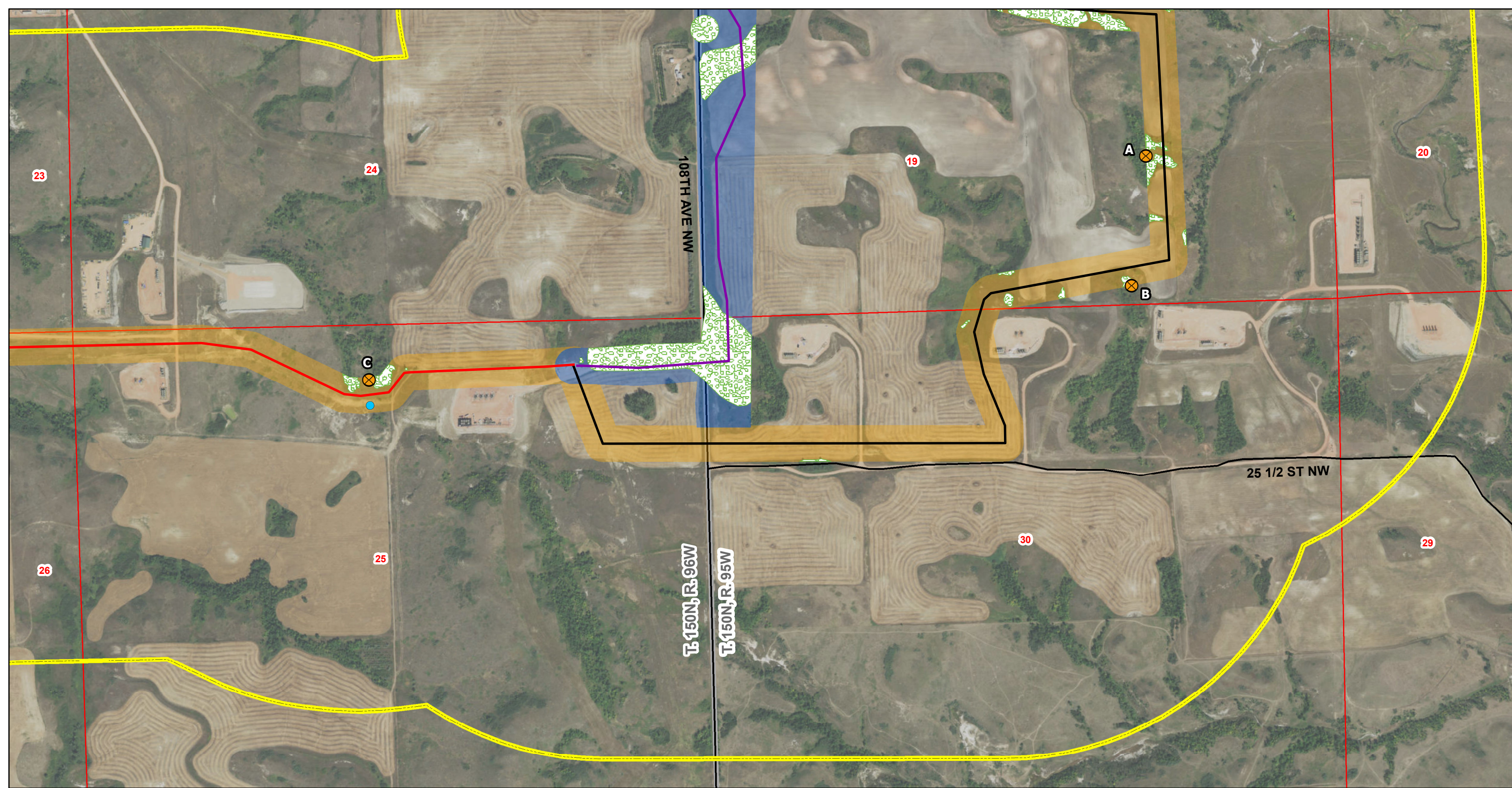


Figure 1.A
T. 150N, R. 96W & R. 95W
McKenzie County, North Dakota
 Page 1 of 2

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 0 800 1,600 Feet



Johnson's Corner to Wilson Station

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|---------------------------------|-----------------------------------|----------------------------|---------------------|-------------------------|
| ★ Facility | Rerouted Non-Constructed Pipeline | Highway | 1mile Study Area | Township/Range Boundary |
| ■ Block Valve | Constructed Pipeline | Roads | ND Trust Lands | Section Boundary |
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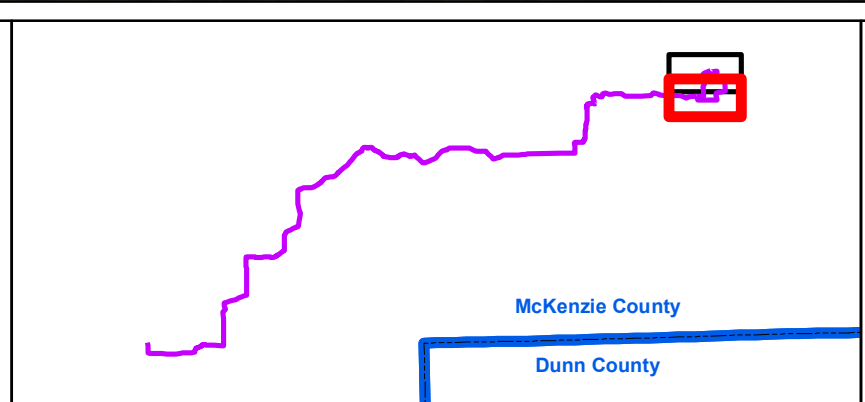
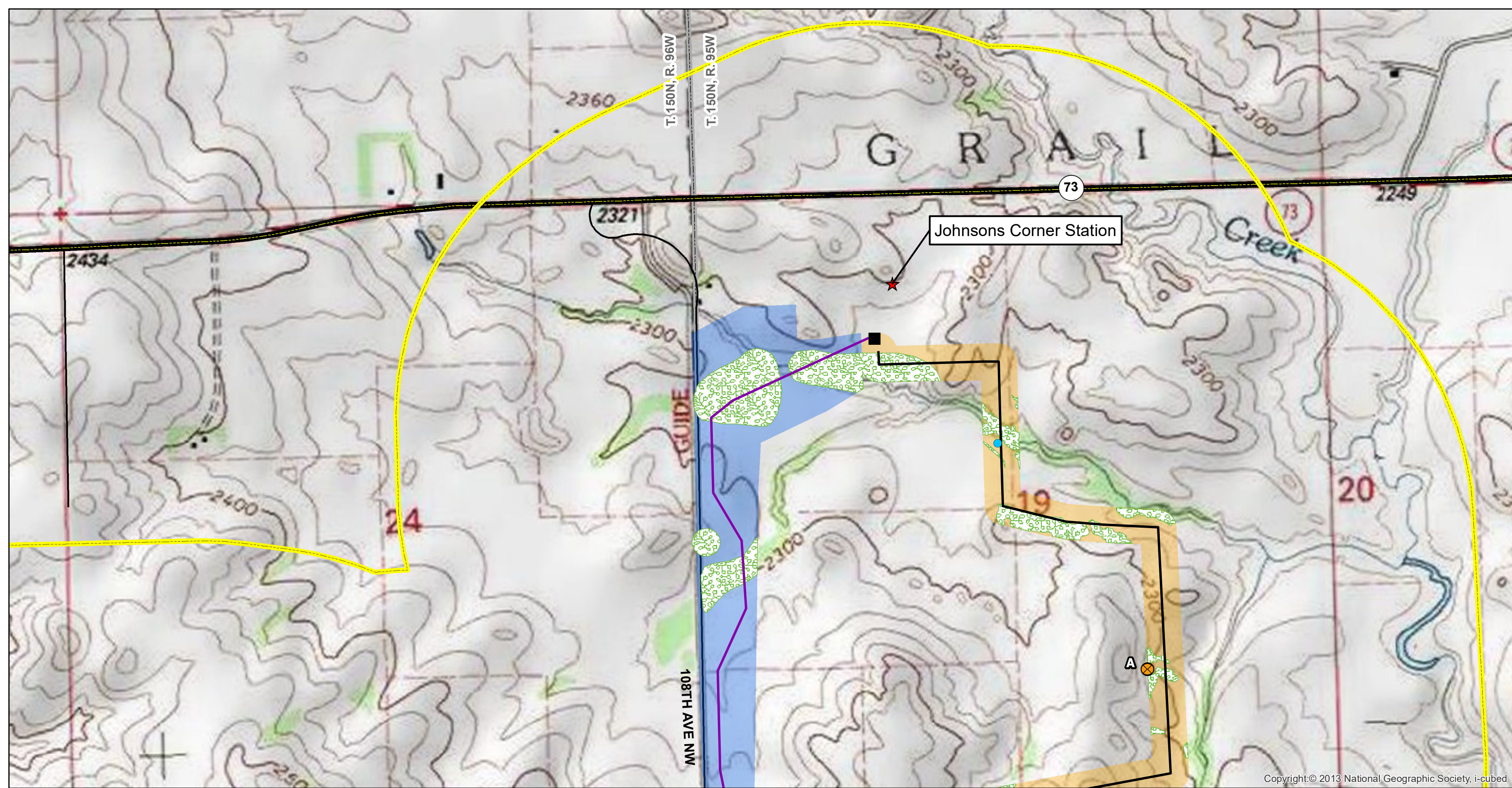


Figure 1.A
T. 150N, R. 96W & R. 95W
McKenzie County, North Dakota

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0 800 1,600 Feet



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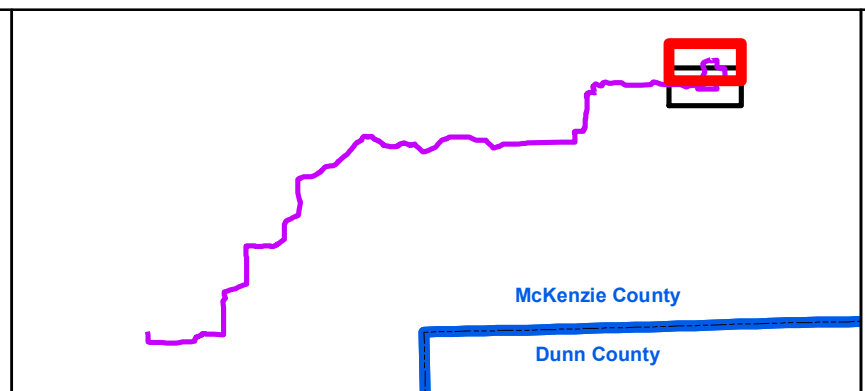
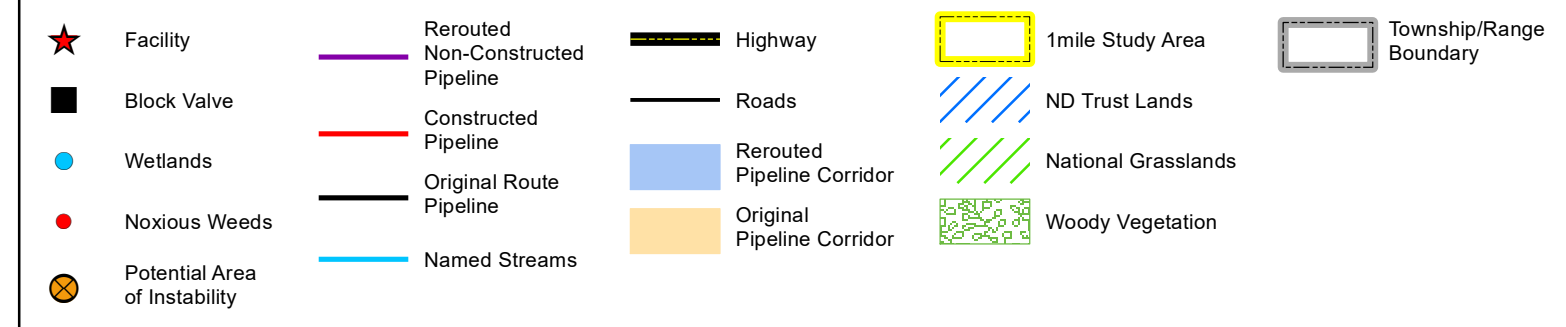
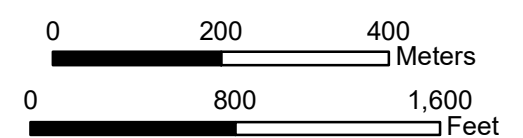
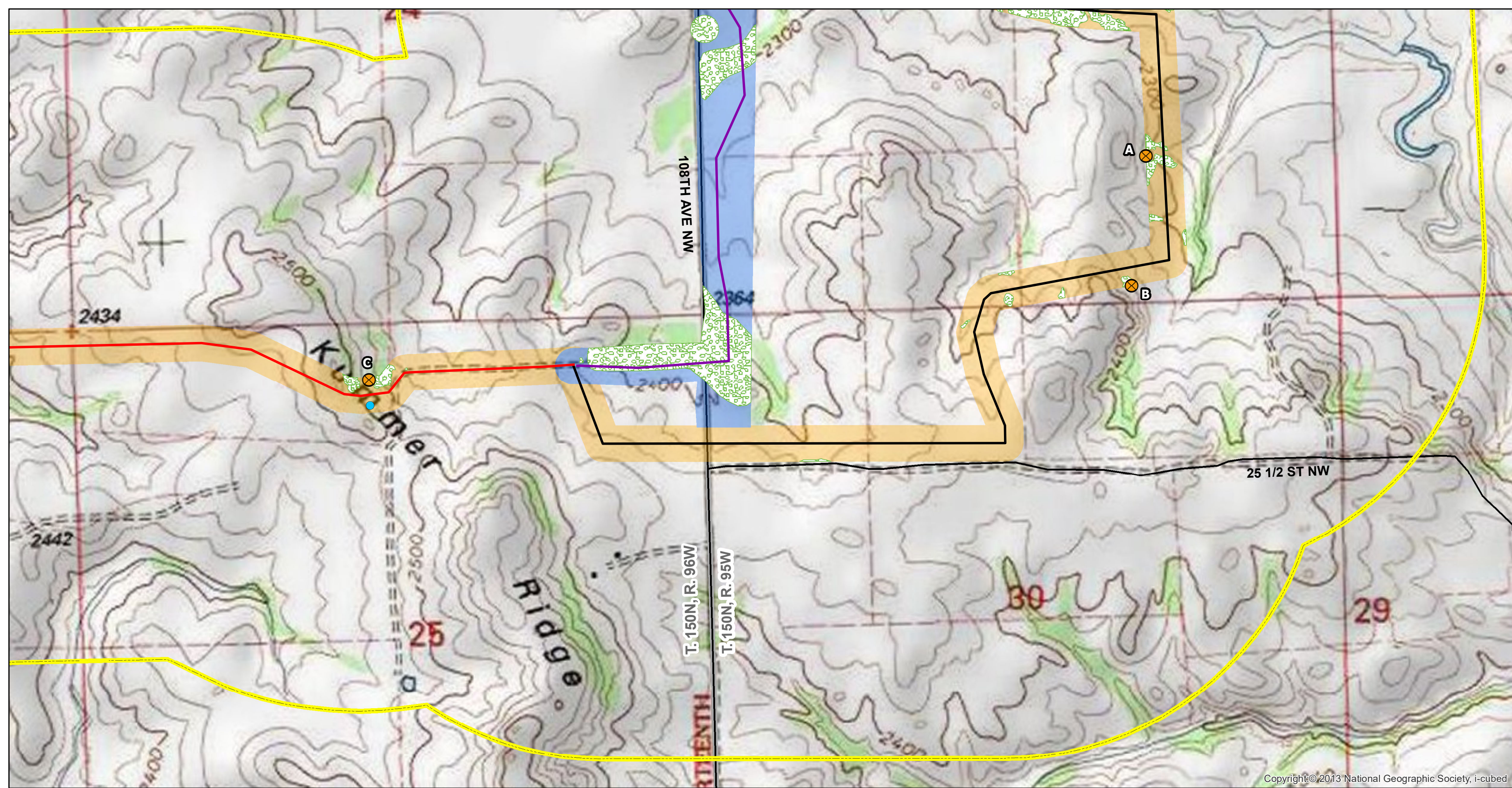


Figure 1.B
T. 150N, R. 96W & R. 95W
McKenzie County, North Dakota
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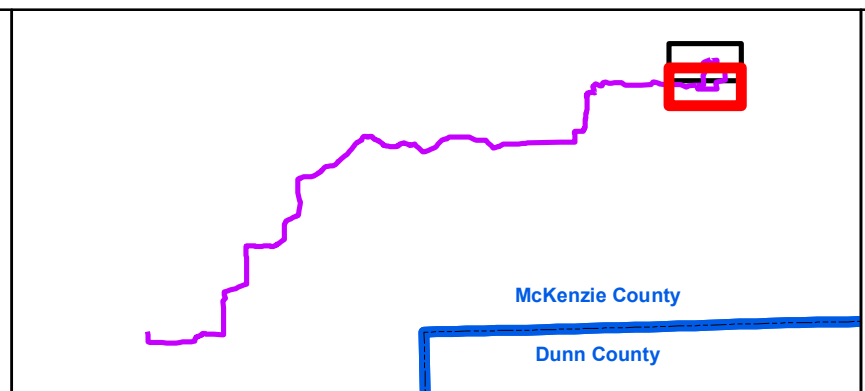


Figure 1.B
T. 150N, R. 96W & R. 95W
McKenzie County, North Dakota
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