

July 7, 2023

Via Hand Delivery & Electronic Mail

arenfandt@nd.gov; ndpsc@nd.gov

Mr. Adam Renfandt
Analyst, Public Utilities Division
North Dakota Public Service Commission
600 E. Boulevard, Dept. 408
Bismarck, ND 58505-0480

**In re: Response to 5-24-23 Request for Information
Bridger Pipeline LLC
16-inch South Bend Crude Oil Pipeline
Case No. PU-21-048
Our File No. 016265-000018**

Dear Mr. Renfandt:

On behalf of Bridger Pipeline LLC (“Bridger”), the following information is provided in response to your May 24, 2023 request for information (Docket No. 87). Five hard copies of the enclosed letter and Attachment A – NDPDES Permit are enclosed for filing in Case No. PU-21-048.

Request for Information No. 1: How does Bridger plan to address each of the recommendations listed in section four of the as-built construction report?

Recommendation No. 1: Request Bridger to repair observed soil subsidence and install erosion control in order to prevent sediment washing into Cherry Creek (Observation Point 25).

Response to Recommendation No. 1: In accordance with the recommendation, Bridger installed straw waddling for sediment control at Observation Point 25.

Recommendation No. 2: Request Bridger to implement BMPs and install additional erosion control measures along swales within the route to prevent soil erosion.

Response to Recommendation No. 2: Bridger implemented additional erosion control measures at several points along the route. These included Observation Points 10, 19, 26, 27, 28, 31 and 55. Erosion control measures utilized included the installation of straw waddling and matting, and regrading and seeding as appropriate.

Recommendation No. 3: Request Bridger to repair broken fence to prevent disruption in landowner agriculture practices (Observation Point 16).

Response to Recommendation No. 3: In accordance with the recommendation, Bridger has repaired the fence at Observation Point 16.

Recommendation No. 4: Request Bridger to remove construction debris if not currently in use or will be in use in the near future (Observation Points 42, 45, 46, 50).

Response to Recommendation No. 4: Bridger has since removed construction pads from the above-referenced Observation Points.

Recommendation No. 5: Request regrading/contouring at select areas prior to final re-seeding (Observation Points 51, 60, 64, 65).

Response to Recommendation No. 5: Bridger has since reworked soil in these areas to address the erosion and grading concerns noted. Reseeding along the entire route, where necessary, is currently underway.

Request for Information No. 2: File with the Commission both an electronic and a paper copy of the corridor approved by the Commission and the facility design specifications for the construction of the facility, showing the location of the transmission facility as built in the format detailed in Order Provision No. 33 to Certification Relating to Order Provisions – Transmission Facility Siting, that is attached to the June 8, 2022, Findings of Fact, Conclusions of Law and Order.

Response No. 2: As-built shapefiles are being finalized by Bridger's contractor. Bridger will file the requested GIS and associated hard copies as soon as they are received.

Request for Information No. 3: File with the Commission a copy of Bridger's North Dakota Pollutant Discharge Elimination System General Permit.

Response No. 3: See Attachment A hereto.

Request for Information No. 4: Identify Bridger's compliance with performing a third-party audit of control room operations regarding leak detection concerns also listed in section four of the recommendations of the as-built construction report.

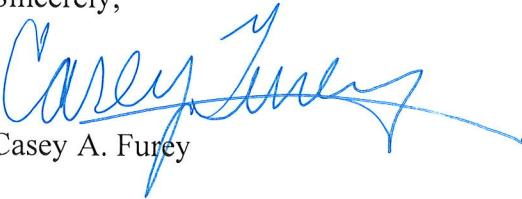
Response No. 4: Bridger has engaged a third party and the audit process is underway.

Request for Information No. 5: Provide details on the submission of the Tree and Shrub Mitigation Plan also listed in section four of the recommendations of the as-built construction report.

Response No. 5: Bridger's consultant, Keitu Engineers & Consultants, Inc. (Keitu), performed the project's pre-construction surveys. Keitu will be completing the post construction survey this summer. Once complete, Bridger will subsequently submit a Tree and Shrub Mitigation Plan for Commission review and approval.

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

Sincerely,



Casey A. Furey

CAF

Enc.

cc: Kevin Cook
Ken Dockweiler
Tyler Reece
Tom Litman

July 14, 2022

North Dakota Pollutant Discharge Elimination System (NDPDES)
General Permit for Stormwater Discharges from Construction Activity
NOTICE OF COVERAGE

Permittee(s)

Owner Contact: Bob Dundas
Bridger Pipeline LLC
PO Box 2360
Casper, WY 82602



Operator Contact: TBD

Coverage under the 2020 reissued construction general permit (NDR11-0000) is identified as follows:

Permit ID: **NDR111887** Site Name: **South Bend Pipeline**

Please remember to update the Stormwater Pollution Prevention Plan (SWPPP) as appropriate for site conditions. The best management practices (BMPs) and temporary structures must be inspected, maintained and adjusted until the site is stabilized following construction activities. Once the site is stabilized as outlined in the general permit, you may end permit coverage by filing a termination notice. Cities or counties may impose additional requirements and/or specific BMPs for construction affecting their storm drainage system. Please check with the local officials to be sure all local stormwater management considerations are addressed.

Additional Information

The permit will expire on March 31, 2025. The permit conditions, forms and related information may be found on our web site at:

https://deq.nd.gov/WQ/2_NDPDES_Permits/7_Stormwater/StW.aspx

Should you have any questions on the permit, please contact a stormwater staff person listed below.

Dallas Grossman
701.328.5242
dgrossma@nd.gov

Sam DeVries
701.328.5215
sgDeVries@nd.gov

Julianna Kari
701.328.5285
jmkari@nd.gov

Kylee Harrison
701.328.5187
kharrison@nd.gov