

September 3, 2024

*Via Hand Delivery & Electronic Mail*

Mr. Steve Kahl  
North Dakota Public Service Commission  
600 E. Boulevard, Dept. 408  
Bismarck, ND 58505-0480  
[ndpsc@nd.gov](mailto:ndpsc@nd.gov)

In re: Cerilon GTL ND Inc.  
Cerilon GTL North Dakota Project  
Siting Application – Williams County  
Case No. PU-23-325  
OAH File No. 20230374  
Our File No. 201121-000004

Dear Mr. Kahl:

Cerilon GTL ND Inc. provides the below information in response to the Commission's request for supplemental information that was discussed at the project's August 19, 2024, work session.

**I. Buford-Trenton Irrigation District**

Cerilon has engaged with the Buford-Trenton Irrigation District (the District) to provide project information and to confirm that Cerilon will not impede the use and maintenance of the irrigation canal. Cerilon is working with the District to ensure that their access needs are met during construction and operation of the GTL facility.

The former District Manager, Mr. Ken Kjos, was provided an early project overview in March 2023 as part of a broader stakeholder engagement meeting. Mr. Kjos responded to a notification letter sent as part of the NDPSC process indicating that the District had no concerns about the construction of the facility as long as Cerilon's operations do not impede the District from operating and maintaining the canal. Cerilon held a follow up meeting with Mr. Kjos on July 6, 2023 where he stated that the District required a 50 foot maintenance buffer along the canal and Cerilon confirmed that neither the function of the canal or access to the canal for maintenance would be impeded.

In May 2024, Cerilon's engineering team invited the current District Manager, Ms. Amanda Hurley, to meet on site to discuss the District's operation and maintenance needs. Ms. Hurley specified that a maintenance buffer of 50 feet from the top of the bank was required and Cerilon

has confirmed that this can be accommodated. Procedures for access to the site for canal maintenance will be developed prior to construction start.

## **II. Pipeline Rerouting**

Pipelines owned by Kinder Morgan and Grayson Mill will need to be rerouted to accommodate construction of the Project and these lines will be rerouted entirely on Cerilon's property at Cerilon's cost. Cerilon has been working with Kinder Morgan and Grayson Mill to plan for rerouting these lines and engineering work is scheduled to begin in Q1 2025. Installation, tie-ins and removal of existing pipelines will occur immediately after Cerilon takes a Final Investment Decision (FID) in 2026. Pipeline owners will be responsible for securing regulatory authorizations for these changes.

## **III. Construction Traffic Mitigation**

Construction traffic to and from the site will be managed as part of a Construction Management Plan that will be reviewed with the townships, Williams County, and the North Dakota Department of Transportation. The Construction Management Plan is being developed as part of the FEL3/FEED engineering scope currently underway. Construction traffic will vary during the execution of the project and will consist of the following:

- **Construction worker transportation to and from site:** A day-night shift pattern is envisaged during the peak of construction. Bussing is planned between the existing (and to be expanded) remote camps and the site. As part of this plan, buses are also contemplated for transporting workers from a central location, near or in Williston, to site and back. Invariably some workers will insist on driving themselves to site and the project is investigating various parking area options nearby.
- **Early works and topsoil removal:** During the early execution phase and as part of site development a significant amount of topsoil will need to be removed and relocated nearby for storage purposes. A certain amount of fill will also need to be imported from nearby quarries. A significant number of dump trucks will be required for these activities. Cerilon will coordinate these activities with North Dakota Department of Transportation, where required. Cerilon is also investigating the implementation of temporary traffic control measures during this activity and is considering quarries located west of Trenton to limit impact on traffic through the town.
- **Large module and super heavy load deliveries to site:** During construction, there will be several large modules and heavy reactors transported to site from the Duluth Seaport and smaller ones transported from Alberta and Texas. Cerilon is working with the North Dakota and Minnesota Departments of Transportation to plan routes so that these modules can be delivered safely on existing infrastructure.

**IV. Site Access Restriction on 147<sup>th</sup> Avenue**

The primary site entrance will be on 42<sup>nd</sup> Street with a second access on 147<sup>th</sup> Avenue to be used only during construction (to allow access for large modules, equipment deliveries and super heavy loads), plant turnarounds, and for emergency egress. Cerilon has made a commitment to adjacent residents to restrict traffic on 147<sup>th</sup> Avenue during operations. This access restriction, along with enforcement provisions, will be included in contracts for all suppliers, service providers and employees. Cerilon will include this requirement in the site induction program. Additional education and enforcement actions, such as the use of signage and site security cameras will be considered if compliance is not adequate.

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

Sincerely,



Casey A. Furey

CAF/lh

Enc.

cc:	ALJ Hope L. Hogan	(via email)	Rochelle Harding	(via email)
	John Schuh	(via email)	Jeff Pendrel	(via email)
	Victor Schock	(via email)	Erik Edison	(via email)
	Wade Mann	(via email)		