

October 9, 2024

*Sent via email to [kcrockford@nd.gov](mailto:kcrockford@nd.gov)*

North Dakota Public Service Commission  
Attn: Mr. Konrad Crockford, Director, Compliance Division  
600 East Boulevard, Dept 408  
Bismarck, ND 58505-0480

RE: North Dakota One-Call Complaint  
Response by Cobra Oil & Gas Corporation

Dear Mr. Crockford,

Please allow this letter to serve as the official response from Cobra Oil & Gas Corporation ("Cobra") regarding that certain one-call complaint outlined in your letter to Cobra dated September 12, 2024 – RE: North Dakota Century Code Chapter 49-23: One-Call Excavation Notice System, stemming from a reported complaint made by North Dakota Pipeline Company, LLC (Enbridge) at a Cobra location on March 6, 2024.

On or around March 6, 2024, Cobra experienced a line break next to one of its pump buildings located at a Cobra central tank battery that needed immediate repair. Cobra attempted to make its initial repairs to the line break by limiting the excavating/digging to the area within the tank battery dike, but the pipe within the dike was proven to be damaged upon repair. Cobra kept digging within the central tank battery location in efforts to locate good pipe that could be adequately tied together. As digging continued in a southerly direction within the central tank battery location, Cobra realized it was getting close to an abandoned Enbridge line and planned to cease digging operations to make a one-call ticket request.

An Enbridge representative arrived on location and notified Cobra's supervisor that it had no one-call request in place. Cobra's supervisor acknowledged that no one-call ticket request had been ordered and agreed to request one before additional digging resumed. While on location, the Enbridge representative stated to Cobra's supervisor that the Enbridge line was abandoned, cut and capped on both ends of their pipeline.

Regrettably, Cobra underestimated the proximity of the Enbridge pipeline in relation to Cobra's central tank battery location where the digging was taking place. All the while, Cobra certainly knows and understands the one-call procedures and the importance of one-call compliance by all to ensure safety for all. Soon after this occurrence, Cobra conducted a meeting with its field supervisors and company personnel to i) emphasize the importance of following proper one-call procedures in accordance with ND Century Code Chapter 49-23, and ii) make certain that one-call tickets are requested and cleared prior to any Cobra-conducted operations in the future that may require digging or excavating.

Page Two  
October 9, 2024  
Cobra Response to NDPS  
One-Call Complaint

Should you need any further information or explanation from Cobra regarding this matter, please do not hesitate to contact me by phone at (940) 716-5100 or by email at [bswenson@cobraogc.com](mailto:bswenson@cobraogc.com).

Respectfully submitted,

A handwritten signature in blue ink that reads "Bryan W. Swenson". The signature is written in a cursive style with a long horizontal flourish at the end.

Bryan W. Swenson  
Vice President - Land