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1250 West Century Avenue  
Mailing Address:  
P.O. Box 5601  
Bismarck, ND 58506-5601  
(701) 530-1600

January 24, 2022

Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Re: WBI Energy Transmission, Inc.  
Line Section 7 Expansion Project  
Docket No. CP22-6-000  
Alternative Measure – Pipeline Reroute

Dear Ms. Bose:

On October 11, 2021, WBI Energy Transmission, Inc. (WBI Energy) filed a Prior Notice application with the Federal Energy Regulatory Commission (FERC or Commission) pursuant to Section 7 of the Natural Gas Act and Sections 157.205, 157.208(b), and 157.211(a)(1) of the Commission's regulations, for authorization to construct and operate natural gas pipeline facilities in McLean and Morton Counties, North Dakota (Project) under its blanket certificate obtained in Docket Nos. CP82-487-000, et al. The 60-day notice period ended December 20, 2021 and no protests were filed.

WBI Energy herewith submits an alternative measure request in accordance with the FERC's Upland Erosion Control, Revegetation, and Maintenance Plan, Part IV.A., to use areas outside of previously approved workspaces to reroute a portion of the pipeline. After WBI Energy filed the application for the Project, two landowners requested the pipeline take a more northerly route through their properties and approve of the alternative route proposed herein. No additional landowners are impacted by the alternative route.

As seen in Attachment A – Updated Alignment Sheet, the reroute begins at approximate station number (Sta. No.) 31+00 continuing in an easterly direction before turning southeast and rejoining the original route at approximate Sta. No. 88+00. For additional reference, please see Attachment B – Updated Aerial Exhibits showing the proposed reroute in red and the original route in purple.

Due to an increase in length of the pipeline (approximately 300 feet), an additional 0.5 acres will be affected during construction and an additional 0.27 acres will be affected during operation. All land affected by the proposed reroute is classified as agricultural land. WBI Energy has updated Tables 1.3-1, 7.1-1, 7.1.1-1, and 8.2-1 from the Environmental Report and they are included in Attachment C – Updated Acreage Tables.

The United States Fish and Wildlife Service and the State Historical Society of North Dakota were consulted on the additional areas of impact, and their concurrences with a “no effect” determination are included in Attachment D – Agency Consultations. No wetlands, waterbodies, or other sensitive environmental resource areas will be impacted by the alternative route. The right-of-way will be reclaimed in accordance with the Commission’s Upland Erosion Control, Revegetation, and Maintenance Plan and applicable permit requirements.

WBI Energy respectfully requests approval of this alternative measure by February 7, 2022 in order to continue with Project planning for construction.

Any questions regarding this alternative measure request should be addressed to the undersigned at (701) 530-1576.

Sincerely,

/s/ Andrew Bates

Andrew Bates  
Supervisor, Regulatory Affairs

Attachments

cc: Paul Friedman, FERC Environmental Project Manager

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated this 24th day of January 2022.

By /s/ Andrew Bates  
Andrew Bates  
Supervisor, Regulatory Affairs  
WBI Energy Transmission, Inc.  
1250 West Century Avenue  
Bismarck, ND 58503  
Telephone: (701) 530-1576

STATE OF NORTH DAKOTA     )  
COUNTY OF BURLEIGH        )

I, Andrew Bates, being first duly sworn, do hereby depose and say that I am the Supervisor, Regulatory Affairs for WBI Energy Transmission, Inc.; that I have read the foregoing document; that I know the contents thereof; that I am authorized to execute such document; and that all such statements and matters set forth therein are true and correct to the best of my knowledge, information and belief.

Dated this 24 day of January 2022.

By *Andrew Bates*  
Andrew Bates  
Supervisor, Regulatory Affairs

Subscribed and sworn to before me this *24<sup>th</sup>* day of January 2022.

*Carmen Fish*

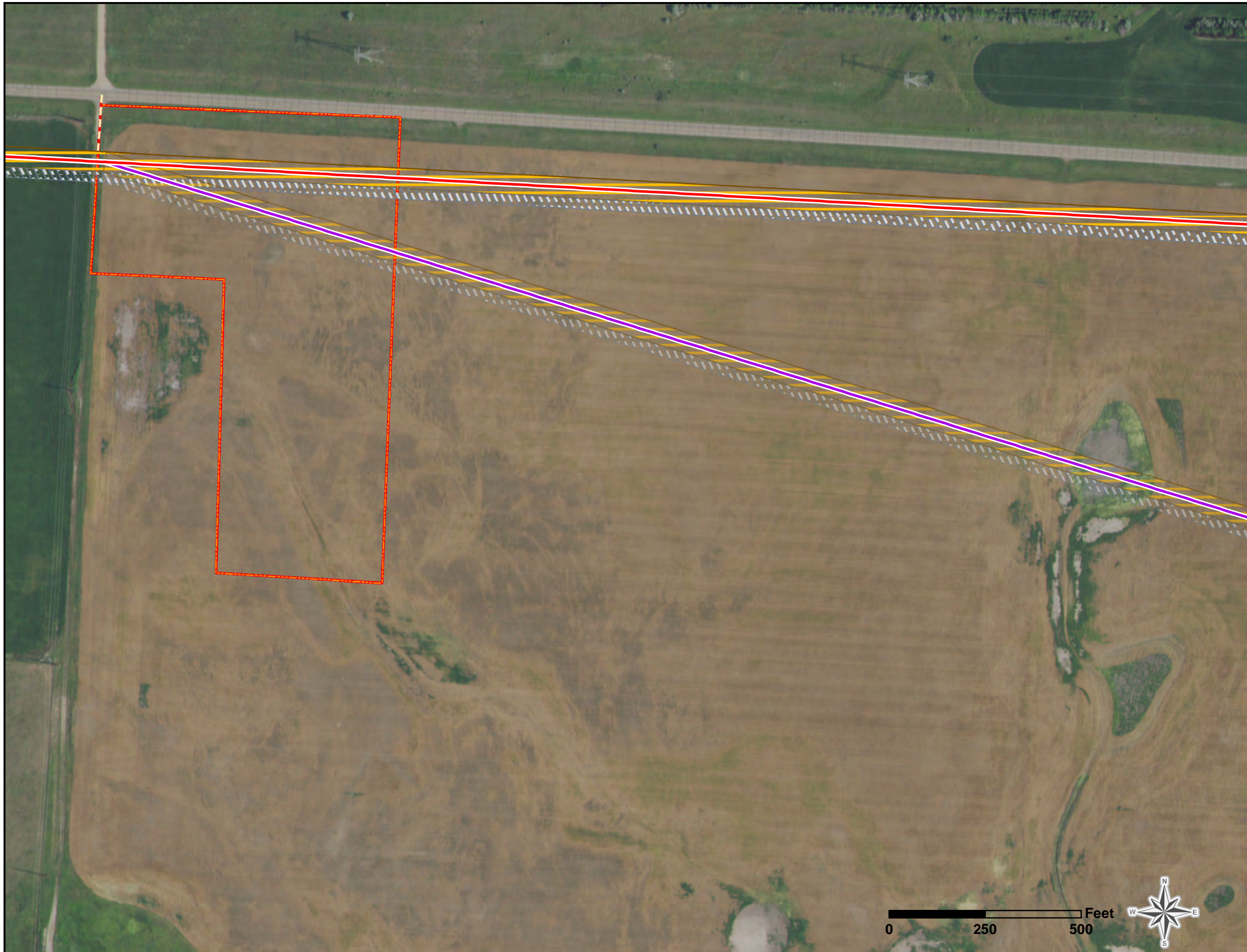
Carmen Fish, Notary Public  
Burleigh County, North Dakota  
My Commission Expires: 1/3/2024

CARMEN FISH  
Notary Public  
State of North Dakota  
My Commission Expires January 3, 2024

Attachment A  
Updated  
Alignment Sheet



Attachment B  
Updated Aerial  
Exhibits









# Line Section 7 Expansion Project

Aerial Project  
Overview Exhibit

Exhibit 2 of 16

## Legend

-  Access Roads
-  Proposed Pipeline
-  Original Proposed Pipeline
-  Permanent ROW
-  TWS
-  Storage Location

McLean County, ND

1 in = 250 ft



## PROJECT AREA OVERVIEW



0 250 500 Feet












# Line Section 7 Expansion Project

Aerial Project  
Overview Exhibit

Exhibit 3 of 16

## Legend

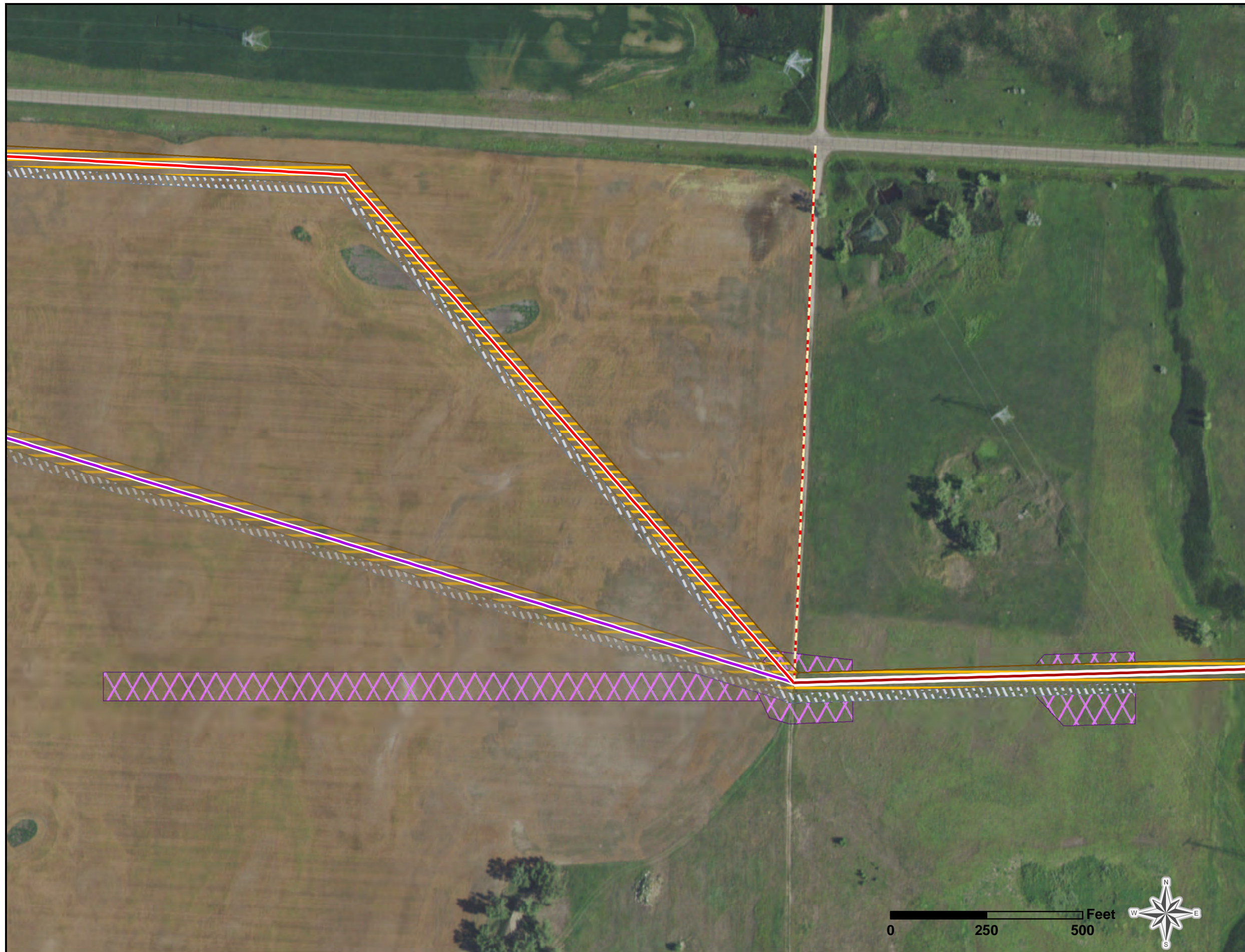
-  Access Roads
-  Proposed Bore
-  Proposed Pipeline
-  Original Proposed Pipeline
-  Permanent ROW
-  TWS
-  ATWS

McLean County, ND

1 in = 250 ft



## PROJECT AREA OVERVIEW



Attachment C  
Updated Acreage  
Tables

# RESOURCE REPORT 1 TABLE UPDATES

Table 1.3-1			
Summary of Land Requirements			
Facility	County, State	Land Affected During Construction (acres)	Land Affected During Operation (acres)
<b><u>Pipeline Facilities</u></b>			
Pipeline <sup>1</sup>	McLean Co., ND	113.99	58.62
<b>Subtotal</b>		<b>113.99</b>	<b>58.62</b>
<b><u>Aboveground Facilities</u></b>			
Blue Flint Delivery Station	McLean Co., ND	1.37	0.92
Blue Flint Take Off Valve Setting	McLean Co., ND	3.54	0.13
Glen Ullin Receipt Facilities	Morton Co., ND	0.1	0
<b>Subtotal</b>		<b>5.01</b>	<b>1.05</b>
<b><u>Staging Areas</u></b>			
Storage Yards	McLean Co., ND	20.96	0
<b>Subtotal</b>		<b>20.96</b>	<b>0</b>
<b><u>Access Roads</u></b>			
Existing Access Roads <sup>2</sup>	McLean Co. & Morton Co., ND	18.22 acres (McLean Co.) 0.68 acres (Morton Co.)	0
New Access Roads <sup>3</sup>	McLean Co., ND	0.23	0.13
<b>Subtotal</b>		<b>19.13</b>	<b>0.13</b>
<b>Project Total</b>		<b>159.09</b>	<b>59.80</b>
<sup>1</sup> Pipeline land affected during construction includes all extra workspace areas. <sup>2</sup> Existing access roads include both pipeline and aboveground facility locations and have a width of 20 feet. <sup>3</sup> New access roads include the proposed Blue Flint Delivery Station access road and the proposed Blue Flint Take Off Valve Setting access road.			

# RESOURCE REPORT 7 TABLE UPDATES

Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
<b>Pipeline Facilities</b>							<b>Total Acres: 113.99</b>	
C1012F	Urban land, industrial-Ustorthents complex, 0 to 25 percent slopes	Loam	Well drained	ML to MH	Loamy till	Backslope	2.00	1.76
C210A	Williams-Bowbells loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	16.20	14.21
C210B	Williams-Bowbells loams, 3 to 6 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	30.60	26.84
C210C	Williams-Bowbells loams, 6 to 9 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	3.24	2.84
C451A	Arnegard loam, 0 to 2 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Swales	0.44	0.39
C135D	Zahl-Williams loams, 9 to 15 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ridges, Hills	0.61	0.54
C874B	Wabek-Appam complex, 2 to 6 percent slopes	Gravelly sandy loam	Excessively drained	MH to VH	Sandy and gravelly glaciofluvial deposits	Rises	1.73	1.52
C814B	Bowdle-Lehr loams, 2 to 6 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	4.52	3.97
C810A	Bowdle loam, 0 to 2 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	7.00	6.14

Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
C829A	Marysland loam, 0 to 1 percent slopes	Loam	Poorly drained	ML to MH	Alluvium over glaciofluvial deposits	Depressions	0.80	0.70
C825A	Divide loam, 0 to 2 percent slopes	Loam	Somewhat poorly drained	ML to MH	Local alluvium	Flats	1.80	1.58
C3A	Parnell silty clay loam, 0 to 1 percent slopes	Silty clay loam	Very poorly drained	ML	Local alluvium	Depressions	0.51	0.45
C132C	Williams-Zahl-Zahill complex, 6 to 9 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ground moraines	3.07	2.69
C580A	Harriet-Regan-Stirum complex, 0 to 2 percent slopes, occasionally flooded	Loam	Poorly drained	ML	Local alluvium	Drainageways	0.50	0.44
C999F	Orthents-Aquents-Urban land, highway complex, 0 to 35 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Swales	0.54	0.47
C667A	Williams-Niobell loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	3.00	2.63
C6A	Tonka-Parnell complex, 0 to 1 percent slopes	Silt loam	Poorly drained	ML	Local alluvium over till	Depressions	5.00	4.39
C471A	Grail silty clay loam, 0 to 2 percent slopes	Silty clay loam	Moderately well drained	ML	Local alluvium	Swales	1.60	1.40
C412A	Roseglen silt loam, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Loamy glaciolacustrine deposits	Flats on glacial lakes (relict)	17.00	14.91
C155F	Zahl-Max-Arnegard loams, 15 to 60 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ridges	0.22	0.19
C160A	Falkirk loam, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy glaciofluvial deposits over till	Swales	13.00	11.40

Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
C413B	Roseglen-Transem silt loams, 2 to 6 percent slopes	Silt loam	Moderately well drained	ML to MH	Loamy glaciolacustrine deposits	Flats on glacial lakes (relict)	0.60	0.53
C64C	Wamduska low precipitation-Mauvais complex, 1 to 9 percent slopes	Loamy coarse sand	Excessively drained	MH to VH	Sandy glaciolacustrine deposits	Beaches	0.01	0.01
<b>Aboveground Facilities</b>							<b>Total Acres: 5.01</b>	
Blue Flint Delivery Station							Total Acres: 1.37	
C1012F	Urban land, industrial-Ustorthents complex, 0 to 25 percent slopes	Loam	Well drained	ML to MH	Loamy till	Backslope	1.37	27.35
Blue Flint Take Off Valve Setting							Total Acres: 3.54	
C412A	Roseglen silt loam, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Loamy glaciolacustrine deposits	Flats on glacial lakes (relict)	3.54	70.66
Receipt Facility Upgrades within the Glen Ullin Compressor Station								
E0415A	Belfield-Daglum complex, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Slope alluvium derived from shale and siltstone	Hillslopes	0.1	2.0
<b>Storage Yards</b>							<b>Total Acres: 20.96</b>	
C201A	Bowbells loam, 0 to 3 percent slopes	Loam	Moderately well drained	ML to MH	Fine-loamy till	Flats	2.66	12.69
C210A	Williams-Bowbells loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	1.28	6.11
C210B	Williams-Bowbells loams, 3 to 6 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	10.15	48.43
C164A	Williams-Falkirk loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ground moraines	1.51	7.20

**Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area**

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
C810A	Bowdle loam, 0 to 2 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	4.39	20.94
C814B	Bowdle-Lehr loams, 2 to 6 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	0.97	4.63
<b>Existing Access Roads</b>							<b>Total Acres: 18.90</b>	
C1012F	Urban land, industrial-Ustorthents complex, 0 to 25 percent slopes	Loam	Well drained	ML to MH	Loamy till	Backslope	2.30	12.17
C210A	Williams-Bowbells loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	0.92	4.87
C210B	Williams-Bowbells loams, 3 to 6 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	1.40	7.41
C810A	Bowdle loam, 0 to 2 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	2.23	11.80
C814B	Bowdle-Lehr loams, 2 to 6 percent slopes	Loam	Well drained	ML to MH	Loamy alluvium over sandy and gravelly glaciofluvial deposits	Swales	0.83	4.39
C874B	Wabek-Appam complex, 2 to 6 percent slopes	Gravelly sandy loam	Excessively drained	MH to VH	Sandy and gravelly glaciofluvial deposits	Rises	0.39	2.06
C135D	Zahl-Williams loams, 9 to 15 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ridges, Hills	0.42	2.22
C580A	Harriet-Regan-Stirum complex, 0 to 2 percent slopes	Loam	Poorly drained	ML	Local alluvium	Drainageways	0.86	4.55
C132C	Williams-Zahl-Zahill complex, 6 to 9 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ground moraines	1.00	5.29

**Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area**

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
C999F	Orthents-Aquents-Urban land, highway complex, 0 to 35 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Swales	0.15	0.79
C667A	Williams-Niobell loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	0.51	2.70
C667B	Williams-Niobell loams, 3 to 6 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Rises	0.46	2.43
C160A	Falkirk loam, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy glaciofluvial deposits over till	Swales	3.50	18.52
C412A	Roseglen silt loam, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Loamy glaciolacustrine deposits	Flats on glacial lakes (relict)	2.12	11.22
C6A	Tonka-Parnell complex, 0 to 1 percent slopes	Silt loam	Poorly drained	ML	Local alluvium over till	Depressions	0.27	1.43
C164A	Williams-Falkirk loams, 0 to 3 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Ground moraines	0.85	4.50
C451A	Arnegard loam, 0 to 2 percent slopes	Loam	Well drained	ML to MH	Fine-loamy till	Swales	0.01	0.05
E2203A	Farland silt loam, 0 to 2 percent slopes	Silt loam	Well drained	ML to MH	Fine-silty alluvium	Alluvial flats	0.67	3.54
E0415A	Belfield-Daglum complex, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Slope alluvium derived from shale and siltstone	Hillslopes	0.01	0.05
<b>New Access Roads</b>							<b>Total Acres: 0.23</b>	
C1012F	Urban land, industrial-Ustorthents complex, 0 to 25 percent slopes	Loam	Well drained	ML to MH	Loamy till	Backslope	0.16	69.57



Table 7.1-1: Selected Physical and Interpretive Characteristics of the Soil Map Units within the Project Area

Map Unit Symbol	Map Unit Name	Surface Texture	Drainage	Permeability	Parent Material	Landform	Acres	% of Project Area
C412A	Roseglen silt loam, 0 to 2 percent slopes	Silt loam	Moderately well drained	ML to MH	Loamy glaciolacustrine deposits	Flats on glacial lakes (relict)	0.07	30.43

VL: Very Low – ML: Moderately Low – MH: Moderately High – H: High  
NRCS 2021e

Table 7.1.1-1  
Summary of Soil Characteristics in the Project Area <sup>a-h</sup>

Facility Type	Total Acres	Prime Farmland <sup>a</sup>	Farmland of Statewide/Local Importance <sup>b</sup>	Hydric <sup>c</sup>	Water Erodible <sup>d</sup>	Wind Erodible <sup>e</sup>	Compaction Prone <sup>f</sup>	Revegetation Concerns <sup>g</sup>	Stony-Rocky <sup>h</sup>
<b>Pipeline</b>	113.99	15.04	77.54	7.38	10.14	0	2.11	11.92	0
<b>Storage Yards</b>	20.96	2.66	17.33	0	0	0	0	0	0
<b>Aboveground Facilities</b>	5.01	0	3.52	0	1.35	0	0	1.35	0
<b>Access Roads</b>	19.13	3.51	9.23	0	2.61	0	0	4.16	0
<b>Totals</b>	<b>159.09</b>	<b>21.21</b>	<b>107.62</b>	<b>7.38</b>	<b>14.10</b>	<b>0</b>	<b>2.11</b>	<b>17.43</b>	<b>0</b>

- a. Includes soils classified in Web Soil Survey as prime farmland
- b. Includes soils classified in Web Soil Survey as farmland of statewide or local importance
- c. Includes Wetlands crossed by the Project area
- d. Includes soils with a slope class of greater than 9-15 percent or soils within a delineated wetland
- e. Includes soils in wind erodibility groups 1 through 3
- f. Includes soils that have a silty clay loam or finer surface texture
- g. Includes soils with a land capability classification of 4 or greater
- h. Includes soils with a cobble, rock, boulder, shale, channery, or gravelly modifier to the map unit name.

Source: NRCS. 2021. Web Soil Survey. Available online at: <http://websoilsurvey.nrcs.usda.gov/>. Accessed September 2021.

# RESOURCE REPORT 8 TABLE UPDATES

Facility Type	<b>Ag. Land</b>		<b>Open Land</b>		<b>Dev. Land</b>		<b>Open Water</b>		<b>Total</b>	
	Const.	Oper.	Const.	Oper.	Const.	Oper.	Const.	Oper.	Const.	Oper.
<b>Pipeline</b>										
Pipeline <sup>a</sup>	94.54	50.54	9.52	4.27	2.55	0.40	7.38	3.41	113.99	58.62
<b>Subtotal</b>	<b>94.54</b>	<b>50.54</b>	<b>9.52</b>	<b>4.27</b>	<b>2.55</b>	<b>0.40</b>	<b>7.38</b>	<b>3.41</b>	<b>113.99</b>	<b>58.62</b>
<b>Aboveground Facilities</b>										
Blue Flint Delivery St.	0	0	0	0	1.37	0.92	0	0	1.37	0.92
Blue Flint Take Off Valve Setting	3.54	0.13	0	0	0	0	0	0	3.54	0.13
Receipt Facilities withing the Glen Ullin Compressor Station	0	0	0	0	0.10	0	0	0	0.10	0
<b>Subtotal</b>	<b>3.54</b>	<b>0.13</b>	<b>0</b>	<b>0</b>	<b>1.47</b>	<b>0.92</b>	<b>0</b>	<b>0</b>	<b>5.01</b>	<b>1.05</b>
<b>Staging Areas</b>										
Storage Yards	20.96	0	0	0	0	0	0	0	20.96	0
<b>Subtotal</b>	<b>20.96</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>20.96</b>	<b>0</b>
<b>Access Roads</b>										
Existing Access <sup>b</sup>	0	0	0	0	18.90	0	0	0	18.90	0
New Access	0 <sup>c</sup>	0.05	0	0	0.23	0.08	0	0	0.23	0.13
<b>Subtotal</b>	<b>0</b>	<b>0.05</b>	<b>0</b>	<b>0</b>	<b>19.13</b>	<b>0.08</b>	<b>0</b>	<b>0</b>	<b>19.13</b>	<b>0.13</b>
<b>Total Impacts</b>	<b>119.04</b>	<b>50.72</b>	<b>9.52</b>	<b>4.27</b>	<b>23.15</b>	<b>1.40</b>	<b>7.38</b>	<b>3.41</b>	<b>159.09</b>	<b>59.80</b>
<sup>a</sup> Pipeline construction area includes temporary workspace and additional temporary workspaces for installation of the pipeline. Farm tap facilities are located within land affected by pipeline construction and are included within the pipeline facilities acreage. <sup>b</sup> Existing access roads have an approximate road width of 20 feet. <sup>c</sup> Construction acreage is included within the Blue Flint Take Off Valve construction acreage total.										

Attachment D  
Agency  
Consultations



WBI ENERGY TRANSMISSION, INC.  
2010 Montana Avenue  
Glendive, MT 59330  
(406) 359-7200  
[www.wbienergy.com](http://www.wbienergy.com)

December 17, 2021

U.S. Fish and Wildlife Service  
North Dakota Field Office  
3425 Miriam Ave.  
Bismarck, ND 58501

**RE: Blue Flint Ethanol Plant Lateral Project**  
McLean County & Morton County, North Dakota

Dear U.S. Fish and Wildlife Service:

Pursuant to the Federal Energy Regulatory Commission (FERC) requirements, WBI Energy Transmission, Inc. (WBI Energy) has been designated as the FERC's non-federal representative to the U.S. Fish and Wildlife Service (USFWS) for activities authorized under WBI Energy's Blanket Certificate (Docket No. CP82-487-000 et. al). WBI Energy wishes to informally consult with your office concerning the impacts of the aforementioned project. WBI Energy requests your comments if you agree or disagree with WBI Energy's evaluation of the effects of the proposed action on endangered, threatened, or candidate species or their habitats as identified in the Endangered Species Act.

WBI Energy submitted the original consultation for this Project in a letter dated August 16, 2021, receiving a response letter on 9/20/2021. Since that time, there has been a modification to the original proposed pipeline route. Landowners have requested that WBI Energy reroute approximately 1 mile of the proposed pipeline on the West end. On behalf of WBI Energy, Beaver Creek Environmental (BCE) conducted natural resource surveys along the proposed reroute. BCE determined that the reroute would not change the original determination of **No Effect**, as detailed in the attached Technical Memorandum.

Please advise if you concur with WBI Energy's determination of No Effect. Please contact me at (406) 359-7295 or [Robbyn.Reukauf@WBIEnergy.com](mailto:Robbyn.Reukauf@WBIEnergy.com) with any questions.

Sincerely,

Robbyn Reukauf  
Environmental Affairs Department

Enclosures: [*Technical Memorandum: Blue Flint Lateral Pipeline Addendum*]



WBI ENERGY TRANSMISSION, INC.  
2010 Montana Avenue  
Glendive, MT 59330  
(406) 359-7200  
www.wbienergy.com

December 17, 2021

U.S. Fish and Wildlife Service  
North Dakota Field Office  
3425 Miriam Ave.  
Bismarck, ND 58501

This Constitutes a report of the Department of the Interior prepared in accordance with the Fish and Wildlife Coordination Act (16 U.S.C. 661 et seq). We have reviewed and have NO OBJECTION to this proposed project.

**DREW BECKER**

Digitally signed by DREW  
BECKER

Date: 2022.01.24 07:10:43 -06'00'

Field Supervisor

**RE: Blue Flint Ethanol Plant Lateral Project  
McLean County & Morton County, North Dakota**

Dear U.S. Fish and Wildlife Service:

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Please advise if you concur with WBI Energy's determination of No Effect. Please contact me at (406) 359-7295 or [Robbyn.Reukauf@WBIEnergy.com](mailto:Robbyn.Reukauf@WBIEnergy.com) with any questions.

Sincerely,

Robbyn Reukauf  
Environmental Affairs Department

Enclosures: [Technical Memorandum: Blue Flint Lateral Pipeline Addendum]



WBI ENERGY TRANSMISSION, INC.  
2010 Montana Avenue  
Glendive, MT 59330  
(406) 359-7200  
[www.wbienergy.com](http://www.wbienergy.com)

December 16, 2021

Andrew Clark, PhD  
Chief Archaeologist  
Archaeology and Historic Preservation Division  
State Historical Society of North Dakota  
612 East Boulevard Ave.  
Bismarck, ND 58505-0830

**RE: Blue Flint Ethanol Plant Lateral Project (ND SHPO Ref: 21-6146)**  
McLean County & Morton County, North Dakota

Dear Mr. Clark:

Pursuant to the Federal Energy Regulatory Commission (FERC) requirements, WBI Energy Transmission, Inc. (WBI Energy), as project sponsor, is assisting the FERC in fulfilling its obligations under the National Historic Preservation Act regarding the Blue Flint Ethanol Plant Lateral Project. WBI Energy is requesting your review and comments to determine if the proposed project may or may not impact listed or unlisted properties that satisfy the National Criteria for Evaluation, located within the area of potential effect.

WBI Energy submitted the original consultation for this Project in a letter dated August 11, 2021, receiving a response letter on August 17, 2021 (ND SHPO Ref: 21-6146) in which SHPO concurred with WBI Energy's determination of *No Historic Properties Affected*. Since that time, there has been a modification to the original proposed pipeline route. Landowners have requested that WBI Energy reroute approximately 1 mile of the proposed pipeline on the West end. On behalf of WBI Energy, Beaver Creek Archaeology completed a Class I and Class III Cultural Resource Inventory for the proposed reroute. No previously documented cultural resources were located within the survey area, and no cultural resources were discovered during the inventory. Please refer to the addendum report enclosed with this letter for further detail on the survey effort.

Per FERC regulations, WBI Energy is required to obtain concurrence that no additional cultural resource survey work is required and that:

- (1) Listed properties listed on the National Register of Historic Places,
- (2) Listed properties listed in the Federal Register as being eligible for inclusion, and
- (3) Unlisted properties that satisfy the National Register Criteria for Evaluation, will not be impacted by the construction or operation of the proposed project.

WBI Energy believes that this modification to the original route does not impact the determination of project impacts provided in the original consultation letter. Please advise if you concur with WBI Energy's determination of *No Historic Properties Affected*. Please contact me at (406) 359-7295 or [Robbyn.Reukauf@WBIEnergy.com](mailto:Robbyn.Reukauf@WBIEnergy.com) with any questions.

Sincerely,

A handwritten signature in blue ink that reads "Robbyn Reukauf". The signature is written in a cursive, flowing style.

Robbyn Reukauf  
Environmental Affairs Department

Enclosures: [*A Class III Cultural Resource Inventory of the Addendum to the Blue Flint Ethanol Plant Lateral Pipeline in McLean County, North Dakota*]



December 27, 2021

Ms. Robbyn Reukauf  
WBI Energy Transmission, Inc.  
2010 Montana Ave  
Glendive, MT 59330

**ND SHPO Ref.: 21-6146 "A Class III Cultural Resource Inventory of the Addendum to the Blue Flint Ethanol Plant Lateral Pipeline in McLean County, North Dakota" in portions of [T145N R82W Section 16 & 21] BCA 2021-586**

Dear Mr. Reukauf,

We reviewed ND SHPO Ref.: 21-6146 "A Class III Cultural Resource Inventory of the Addendum to the Blue Flint Ethanol Plant Lateral Pipeline in McLean County, North Dakota" in portions of [T145N R82W Section 16 & 21] BCA 2021-586 and find the report by Gary Ellis acceptable. We concur with a determination of "No Historic Properties Affected" for this project provided it takes place in the location and manner described in the documentation and provided all borrow comes from an approved source.

Thank you for the opportunity to review this project. If you have any questions please contact Lisa Steckler, Historic Preservation Specialist at (701) 328-3577, e-mail [lsteckler@nd.gov](mailto:lsteckler@nd.gov)

Sincerely,

*for* William D. Peterson, PhD  
State Historic Preservation Officer  
(North Dakota)

21-6146