

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ENERGY PROJECTS

In Reply Refer To:
OEP/DG2E/Gas 4
WBI Energy Transmission, Inc.
Wahpeton Expansion Project
Docket No. PF21-4-000

November 17, 2021

VIA FERC Service

Lori Myerchin
Director, Regulatory Affairs and Transportation Services
WBI Energy Transmission, Inc.
1250 West Century Avenue
P.O. Box 5601
Bismarck, ND 58506-5601

Re: Comments on Draft Resource Reports 1 and 10

Dear Ms. Myerchin:

The enclosure contains the comments of the FERC staff on draft resource reports 1 and 10 for the planned Wahpeton Expansion Project. The comments ask for clarifications of discrepancies and identify missing information that will assist your preparation of a complete application for the project. To facilitate review of the revised resource reports that will be filed in the application, WBI Energy Transmission, Inc. should include a matrix that identifies the specific locations in the resource reports (i.e., section and page number) where the information requested in these comments may be found.

Electronic filing is encouraged using the Commission's eFiling system (see <https://ferconline.ferc.gov/eFiling.aspx>). Be sure to prepare separate volumes, as outlined on the Commission's website at <https://www.ferc.gov/sites/default/files/2020-04/CEII-Filing-guidelines.pdf>, and label all controlled unclassified information (CUI) as described at <https://www.ferc.gov/cui>. Critical Energy Infrastructure Information (CEII) (e.g., plot plans showing equipment or piping details) and privileged information (PRIV) (e.g., cultural resources material containing location, character, or ownership information; trade secret information; proprietary information) are considered CUI. This information should be filed as non-public and labeled as: "CUI//CEII" (18 CFR 388.113), "CUI//PRIV" (18 CFR 388.112), and as otherwise appropriate with other statutes for labeling CUI (e.g., "CUI//CEII//SSI" and in accordance with 49 CFR 15.13 marking

requirements). All CUI should be filed separately from the remaining information, which should be marked “**Public.**” For assistance with the Commission’s eFiling system, please contact FERC Online Support at FERCOnlineSupport@ferc.gov, (866) 208-3676 (toll free), or (202) 502-8659 (TTY).

In addition, effective July 1, 2020, hardcopy deliveries to the Commission’s headquarters in Washington D.C. will only be accepted through the U.S. Postal Service. Hand-deliveries and submissions sent through carriers other than the U.S. Postal Service must be sent to 12225 Wilkins Avenue, Rockville, Maryland 20852 for processing (see Docket No. RM19–18–000; Order No. 862).

For all materials submitted, in addition to the copies filed with the Secretary of the Commission, please provide an electronic copy directly to our third-party environmental contractor, Cardno, Inc. to the attention of Douglas Mooneyhan at Douglas.Mooneyhan@cardno.com and Lavinia DiSanto at Lavinia.Disanto@cardno.com.

Thank you for your cooperation. If you have any questions, please contact me at 202-502-8321.

Sincerely,

David Hanobic
Environmental Project Manager
Office of Energy Projects

Enclosure

cc: VIA FERC Service

WBI Energy Transmission, Inc. (WBI Energy)
Wahpeton Expansion Project
Docket No. PF21-4-000

COMMENTS ON DRAFT RESOURCE REPORTS 1 AND 10

Resource Report 1

1. Provide all applicable agency correspondence. This includes letters, meeting notes, phone logs, and/or emails where substantive information has been discussed or received from relevant federal, state, and local agencies, and federally recognized Native American tribes.
2. Provide the status of environmental and cultural resources surveys. Where surveys are pending, identify the anticipated completion date and the reason for incomplete surveys (for example, landowner access denied).
3. Clarify whether the demand for natural gas service in Kindred and Wahpeton, North Dakota is for residential, commercial, or industrial uses.
4. Many railroad operators require 24-hour installation of pipelines which cross railroads (i.e., boring under the railroad must continue without stopping until the railroad is crossed). Clarify if 24-hour construction would be required at any railroad crossing.
5. Clarify if trench dewatering or any other additional activities (beyond those listed) may be required up to 24-hours a day. Clarify if lost workdays due to poor weather or anticipated poor weather (or any other additional circumstances) would result in work on Sundays and/or seven days per week.
6. WBI Energy indicates that farm taps may be installed. Indicate:
 - a. if the farm taps would be installed by WBI Energy and if they would be within the permanent easement and require new access roads;
 - b. what the tap facility would consist of (e.g., fenced, aboveground, belowground);
 - c. when and how the locations for the farm taps would be decided (including mapping as appropriate); and
 - d. any impacts that would occur on resources, and measures to be implemented to avoid, minimize, or mitigate impacts.

7. Clarify whether there is potential to partially overlap the construction right-of-way with abutting rights-of-way in collocated segments.
8. Clarify the pipeline depth of cover at ditches, which was reported as both 15 feet (section 1.3.2.1) and 6 feet (section 1.3.2.3).
9. Clarify how roads affected by construction would be returned to as good or better condition (e.g., using pre-construction video or photo documentation).
10. Include details regarding proposed cathodic protection facilities including location, dimensions, and type.
11. In the description of horizontal directional drills (HDD), clarify the specific diameter of trees that would not be cut during guide wire installation. Also, discuss the feasibility of not removing any woody vegetation during placement of the guide wires for an HDD.
12. Ensure the United States Geological Survey mapping in Appendix 1A includes mileposts.
13. Provide the following information for all non-jurisdictional facilities:
 - a. company/owner;
 - b. type of facility;
 - c. dimensions (pipe diameter, length, dimensions, horsepower, etc., as appropriate for any pipelines and land area for other facilities);
 - d. as applicable, maps showing locations of existing facilities and any proposed relocations of those existing facilities; and
 - e. federal, state, and local permits required and their status, along with any surveys conducted.

Resource Report 10

1. As necessary, update table 10.6-2 with any additional route or facility adjustments, realignments, etc., that were incorporated into the final project design in response to stakeholder input during the pre-filing process that have resolved stakeholder comments.
2. Viewing the systems alternative discussion, it is not clear how natural gas is currently delivered to Wahpeton. Does WBI Energy currently provide natural gas service to Wahpeton? If not, who provides natural gas service and by what means?

3. Revise sections 10.6 and 10.7 to ensure that data categories are consistent in tables (also include comparison tables in section 10.7) for all alternative routes/sites considered. Data categories should include (where applicable) total acreage affected by construction and operation, the extent of collocation, number of major waterbody crossings, acres of wetlands affected, acres of forest, acres of habitat for federally-listed threatened and endangered species, number of National Register of Historic Places listed or eligible sites, acres of agricultural lands affected, number of roads and railroads crossed, acres of federal, state, or municipal lands affected, miles of steep vertical and side slopes crossed, and numbers of landowner parcels affected.
4. To further justify the selection of preferred alternatives, include more details about concerns expressed by landowners and city officials for Route Alternative 1, about landowner preferences to follow section lines and edges of fields for Route Alternative 2, and about unreceptive landowners for Route Alternative 3.
5. Include an analysis of alternative sites for aboveground facilities, such as block valve and pig launcher/receiver settings, if siting concerns have been identified.