

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

April 14, 2022

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 9 and 11

Dear Ms. Myerchin:

The enclosure contains the comments of the Federal Energy Regulatory Commission (FERC or Commission) staff on draft resource reports 9 and 11 for the planned Wahpeton Expansion Project (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)." 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 and Lavinia DiSanto.

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 (Project)
Docket No. PF21-4-000

COMMENTS ON DRAFT RESOURCE REPORTS 9 AND 11

Resource Report 9

1. Clarify the reference to “WBI Energy’s proposed compressor station” in section 9.2.2.
2. Indicate any equipment, procedures, or measures that WBI Energy would commit to implement to mitigate exhaust emissions from the construction equipment associated with the planned Project. These measures may include: idling restrictions; use of low-sulfur fuel; commitment to use newer tier equipment; installation of controls on temporary stationary equipment; etc.
3. Indicate whether WBI Energy is, or plans to be, a participating member of the U.S. Environmental Protection Agency’s (EPA) Methane Challenge Program and discuss the scope of participation. In addition:
 - a. indicate if WBI Energy would install specific equipment to reduce fugitive methane emissions identified in EPA’s Natural Gas STAR recommended technologies, by state agencies, or in peer-reviewed studies; and
 - b. discuss how WBI Energy would identify leaking valves, seals, or other equipment on the pipeline facilities, and the criteria for repair/replacement.
4. Indicate if there would be any dehydrator(s), line heater(s) or other emission generating equipment at the planned Wahpeton or Kindred Border Stations or other aboveground facilities along the pipeline. If so, for each such unit identify the anticipated: criteria, total, and speciated hazardous air pollutant emissions in tons per year; total and speciated greenhouse gas (as carbon dioxide equivalents) emissions in tons per year, and; operating characteristics (e.g., emission factors, fuel consumption rates, operating hours per year, etc.). Emission factors should be based on one of the following methodologies: EPA-certified emission standards; manufacturer data; current EPA AP-42 emission factors, or; peer reviewed studies for the equipment.

5. Section 9.1.3 states WBI Energy is coordinating with the North Dakota Department of Environmental Quality (NDDEQ) to confirm that the planned modifications to the existing Mapleton Compressor Station would not require a permit to construct from the NDDEQ. Include written correspondence from the NDDEQ indicating if a permit would be required.
6. Describe the potential nature and frequency of abnormal operating conditions that could result in emissions of volatile organic compounds.
7. If not filed with the application, provide an anticipated date of submittal for the noise impact study associated with the planned Wahpeton Border Station.
8. Clarify if operation of the guided bore equipment was included in the pipeline segment construction emission estimates listed in table 9.1.4-1 and supporting calculations within appendix 9B, and whether this operation was assumed to take place on a 24 hour per day basis.
9. Revise table 9.2.4-1 to include the estimated sound pressure level at 50 feet (decibels on the A-weighted scale [dBA]) from the guided bore machine planned for use in the Project's construction.
10. Regarding fugitive dust:
 - a. section 4.0 of the *Fugitive Dust Control Plan* states "water for dust control will be obtained from municipal sources and nearby water sources where necessary permits required by federal, state, and local agencies for procurement of water have been secured." Clarify what is meant by "nearby water sources;"
 - b. include in resource report 2 as applicable, the specific sources of water for dust suppression, a statement confirming permission from owners of privately-held water sources, and volumes anticipated to be taken from each source;
 - c. if not already included, provide permits or authorizations required for water withdrawals in table 1.8-1;
 - d. provide a list of any chemicals to be added to dust suppression water along with safety data sheets and ecotoxicity data;
 - e. provide the estimated number of water trucks per spread, and estimated volume of water placed on the right-of-way for each truck per day; and
 - f. provide a discussion of the Environmental Inspector's role in directing dust suppression activities.

11. Section 9.2.4 states that "...nighttime construction activities outlined in section 1.2...may be carried out 24 hours a day until completed." Section 1.2 states that certain activities, including guided bore operations, may occur up to 24 hours per day, including Sundays and potentially federal holidays. On the basis that WBI Energy states that guided bore operations may be conducted during nighttime hours, provide the following information for each guided bore entry or exit location planned within 0.5 mile of any noise-sensitive area (NSA) where nighttime bore operations could occur:
 - a. the estimated number of days of guided bore activity required for each location;
 - b. a topographic map showing the distance and direction to the nearest NSAs;
 - c. the existing day-night average noise (L_{dn}) at the nearest NSAs and the estimated noise impacts at the NSAs during guided bore activities; and
 - d. a description of any noise mitigation (or proposed alternate measures such as temporary relocation, compensation, etc. that would be implemented during short term guided bore operations) that WBI Energy would implement during guided bore activity to reduce noise impacts at the NSAs to below 55 dBA L_{dn} , or 10 dBA over background if ambient levels are above 55 dBA L_{dn} .
12. For each activity that WBI Energy identifies in section 1.2 that may occur during nighttime hours (outside the timeframe of 7:00am to 7:00pm), revise section 9.2.2 to describe the anticipated characteristics of any noise produced, including both the degree of intermittency (continuous or instantaneous) and noise intensity in sound pressure levels at 50 feet (dBA).
13. Describe any advance landowner notification procedures that WBI Energy would implement prior to the start of any planned or anticipated nighttime construction activities (as described in section 1.2) having the potential to result in noise impacts at NSAs.

Resource Report 11

1. Clarify why WBI Energy labels most of the minimum filing requirements for resource report 11 as "Not applicable."
2. Include measures that would be taken if the Class designation of the pipeline changed over time.

3. Provide an update to WBI Energy's efforts to identify proposed or reasonably foreseeable high consequence areas and any other "identified sites" associated with the planned Project.
4. Provide an update to WBI Energy's efforts to identify proposed or reasonably foreseeable moderate consequence areas associated with the planned Project.
5. Specify the potential impact radius.
6. Indicate whether during coordination with local emergency responders any needs for additional equipment were identified.