



## FEDERAL ENERGY REGULATORY COMMISSION FIELD INSPECTION REPORT

**Date** July 22, 2025

**Project** WBI Energy Transmission, Inc.  
Wahpeton Expansion Project  
Cass and Richland Counties, North Dakota  
Docket No.: CP22-466-000  
Authority: Section 7(c)

**Personnel** FERC Contractor: Tetra Tech, Inc.  
FERC Contractor Staff: Stacie Grove  
Company Staff: Andrew Bates (Regulatory Affairs Manager);  
Greg Huncovsky (Environmental Project  
Manager); Steve Kelly (Project Manager)

Inspection Summary	
<u>0</u>	Problem Areas
<u>0</u>	Noncompliances
<u>No</u>	Follow-Up Letter Required
<u>No</u>	Refer to Enforcement

### Introduction

On July 22, 2025, Stacie Grove of Tetra Tech performed a follow-up restoration inspection of the WBI Energy Transmission, Inc. (WBI) Wahpeton Expansion Project (Project), under contract to the Federal Energy Regulatory Commission (FERC or Commission) and per the request of the FERC Project Manager, Jennifer Fink.

The Project consists of the construction and operation of a total of approximately 60.2 miles of new natural gas pipeline and appurtenant facilities in Cass and Richland Counties, North Dakota. More specifically, the Project includes:

- construction of an approximately 60.2-mile-long, 12-inch-diameter pipeline extending in a southeastward direction from WBI's existing Mapleton Compressor Station (CS) in Cass County, North Dakota, to the Project's ultimate terminus at the new Wahpeton Border Station in Richland County, North Dakota;
- minor modifications to WBI's existing Mapleton CS;
- construction of the new Montana-Dakota Utilities (MDU)-Wahpeton Border Station;
- construction of the new MDU-Kindred Border Station;
- construction of seven new block valve settings;

- construction of four new pig<sup>1</sup> launcher/receiver stations; and
- construction of new ancillary facilities.

The Project is designed to provide up to approximately 20.6 million cubic feet of natural gas per day to southeastern North Dakota and provide natural gas service for the first time to Kindred, North Dakota. The Project also included the installation of two farm taps along the pipeline route.

The Project was authorized for in-service December 1, 2024.

The purpose of the inspection was to determine WBI's compliance with the environmental conditions of the Commission's October 23, 2023 *Order Issuing Certificate* for the Project and to inspect the restoration conditions of the pipeline right-of-way (ROW) and facilities.

The findings of the inspection were that no noncompliances or problem areas were identified.

A site map and photographic record are presented in this report.

## Inspection

On July 22, 2025, weather conditions were cloudy, with strong winds and temperatures ranging from the low 70s (°F) to the low 80s (°F) in nearby Fargo, North Dakota. The Project area received approximately 1.0 inch of precipitation during the two weeks preceding the inspection, with approximately 0.40 inch of precipitation recorded within 8 hours before the inspection, according to data collected at the Fargo Hector International Airport. At the time of the inspection, soil conditions were generally saturated and unstable.

The inspection began at the existing WBI Mapleton Station, continued south along the Project right-of-way (ROW), and ended at the Wahpeton Border Station (Photo Numbers [Nos.] 1 through 21).

WBI reported that except for minor punchlist items, all construction and restoration activities, including those at anomaly repair sites and valves, were complete. Remaining punchlist items included the removal of construction materials, reseeding at a bird conservation area, and the stabilization of several roadside embankments. WBI also stated that there were no outstanding landowner concerns except for several areas of subsidence in agricultural fields that would be addressed after crops were harvested.

At the time of the inspection, numerous unimproved farm roads were saturated and impassable, and dense agricultural crops covered most of the ROW. These factors limited access and, in some cases, obscured visibility. However, the presence of healthy, flourishing crops served as a positive indicator of successful restoration. At most of the inspected areas, the ROW and temporary workspaces were restored, construction debris – including temporary erosion control devices (ECDs) – were removed, and the ROW and workspaces were adequately stabilized, primarily with crops (Photo Nos. 1 to 21).

However, several areas along the restored ROW exhibited cover that was not consistent with adjacent agricultural fields. Observed issues included low-lying areas potentially related to natural topography or possible subsidence (Photo Nos. 4, 6, and 8), presence of noxious weeds (Photo No. 5), as well as isolated bare or sparsely vegetated sections (Photo Nos. 1, 2, 4, 8, 9, 10, 16, 18, and 19). Given the timing of the inspection and recent anomaly repairs, variable conditions along the ROW were not unexpected. However, during the inspection, WBI was generally unable to clarify whether specific observed areas had been identified for further evaluation or included on a punch list for repair; nor could WBI confirm whether vegetation deficiencies were related to anomaly repairs or other factors. The

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<sup>1</sup> A "pig" is a tool that moves through the pipeline and is used for cleaning, internal inspections, or other purposes. A launcher/receiver is an aboveground structure used to install/retrieve pigs from the pipeline.

company stated it would continue re-evaluating the ROW after the fall harvest, and that it would complete repairs at the request of landowners.

Elsewhere along the restored ROW and temporary workspaces, visible agricultural areas were free of large rocks on the surface, and conditions appeared to be similar to adjacent areas that were not impacted by the Project (Photo No. 14). Pipeline markers were in place (Photo Nos. 6, 9, 10, 12, 13, and 14). Road embankments at former road crossings and road auger bore sites were restored and stabilized with vegetation or erosion control blankets, and adjacent public roadways were in good condition and free of cracks or construction materials (Photo Nos. 1, 9, and 18).

However, at approximately Milepost (MP) 57.05, rill erosion had resulted in sediment transport into a densely vegetated roadside stormwater drainage swale (Photo No 19). The accumulated sediment appeared to be contained within the approved workspace limits and no protected resources were affected. Following the inspection, WBI reported that it monitored the site until a temporary straw waddle was added on or shortly before July 29, 2025 (Photo No. 20), stating that the delay in repairs was due to wet weather and saturated soil conditions. The disturbed area was later seeded and stabilized with an erosion control blanket, according to a July 31, 2025 update from WBI.

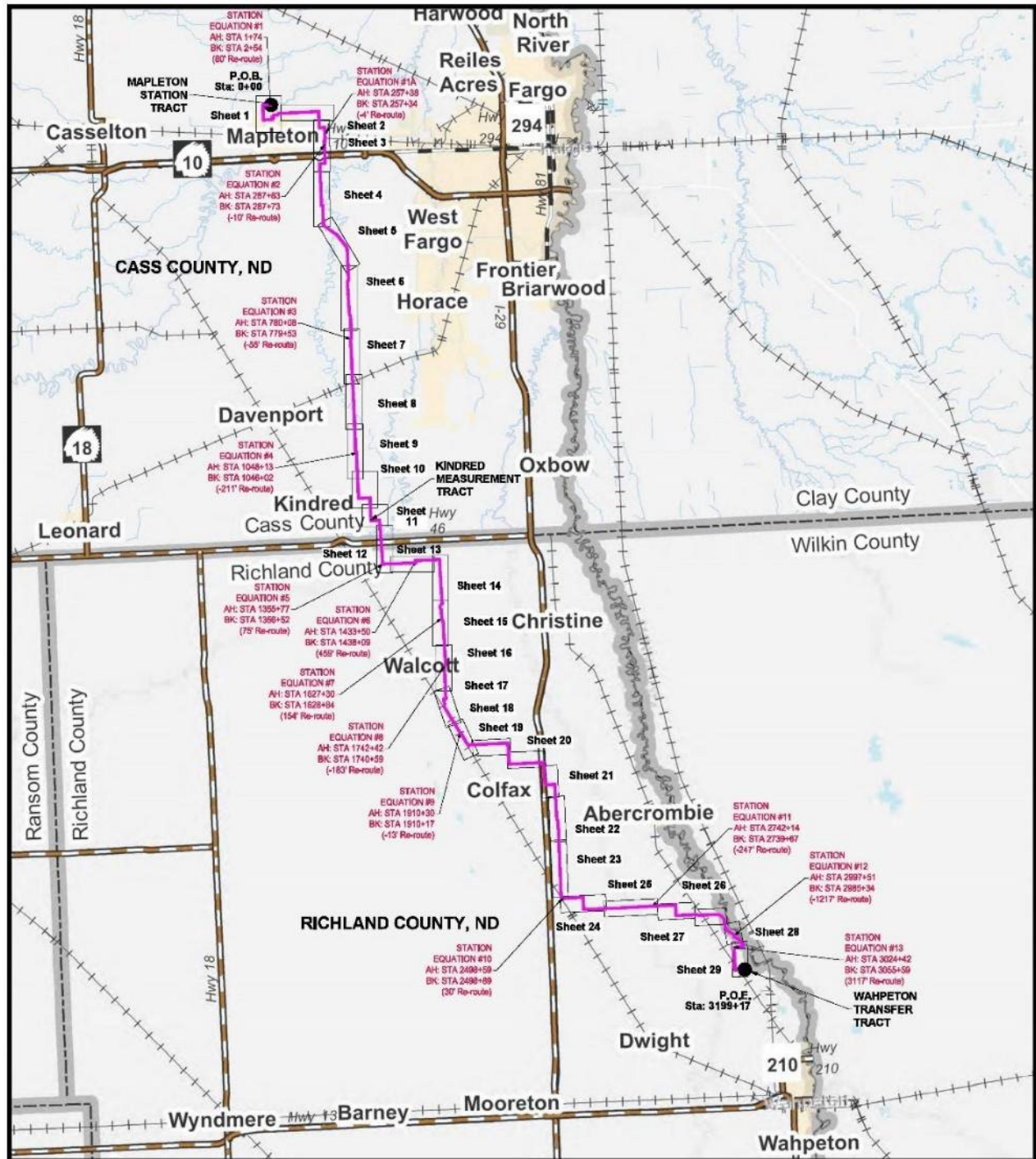
Most Project wetland and waterbody crossings were not observable due to crop cover, and most were agricultural features that were planted with crops by the landowner, according to WBI. At the resource crossings that were accessible, wetland contours appeared to be restored to original conditions and sites were stabilized with mulch, per state requirements according to WBI (Photo Nos. 12 and 13). Temporary ECDs remained in place at wetland boundaries and road crossings, and no environmental concerns were identified.

Aboveground facilities, including valve sites #1 through #7, were adequately cleaned-up and restored (Photo Nos. 3, 7, 11, 17, and 21). Sites were stabilized with a gravel groundcover in accordance with Project plans, and the sites were free of rutting and excessive erosion. Temporary workspaces were stabilized with mulch or hydroseed. Permanent facility perimeter fencing was in place, where required according to WBI. Permanent stormwater outfall measures were installed, and large rock was placed at outfalls to prevent scouring. No environmental concerns were identified.

## **Conclusions and Recommendations**

A follow-up letter is not required at this time, because no problem areas or instances of noncompliance were identified. Restoration was progressing satisfactorily at the inspected components of the Project, and environmental compliance with the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan and Wetland and Waterbody Construction and Mitigation Procedures* was acceptable. In response to rill erosion and sediment transport into a roadside stormwater swale identified at approximately MP 57.05 (Photo No. 19), WBI reported that it monitored the site until on or shortly before July 29, 2025 when it installed temporary ECDs and stated that no sediment had been transported outside the ROW limits (Photo No. 20). The disturbed area was then stabilized with seed and erosion control blanket, according to WBI. Punch-list items were also observed, including sparse vegetation, noxious weeds, and minor subsidence, but no significant environmental concerns requiring prompt attention were identified. Another inspection is tentatively scheduled for the fall of 2026, ideally after crops have been harvested.

# Site Map





**FEDERAL ENERGY REGULATORY COMMISSION  
PHOTOGRAPHIC RECORD**

**Company:** WBI Energy

**Docket Nos.:** CP22-466-000

**Project:** Wahpeton Expansion

**Spread:** Wahpeton Lateral



**Photo No.:** 1

**MP:** 6.45

**Direction:** East

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #10 Site. The ROW and temporary workspaces were restored, and pipeline markers were in place. Restored areas were free of rutting, erosion, and large rocks; however, crop coverage was generally sparse. WBI reported that planting was likely delayed due to anomaly repairs and that the site would be monitored, with additional repairs to be made if requested by the landowner.



**Photo No.:** 2

**MP:** 8.20

**Direction:** Southwest

**Assessment:** Acceptable

**Comments:** Agricultural ROW. The ROW was restored, with no signs of rutting, large rocks, or construction debris. The site was stable; however, crop coverage was generally sparse. WBI reported that planting was likely delayed due to anomaly repairs and that the site would be monitored, with additional repairs to be made if requested by the landowner.

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**Photo No.:** 3

**MP:** 11.70

**Direction:** Northwest

**Assessment:** Acceptable

**Comments:** Aboveground Facility, Valve #2 Site. The valve site, permanent access road, and adjacent temporary workspaces were restored; stabilized with gravel, mulch, or hydroseed; and were free of rutting and erosion. Facility fencing was not required at this valve site, according to WBI. Stormwater management measures were installed, and the outlet was stabilized with rock to prevent scouring. Temporary ECDs remained in place in some areas pending revegetation of the site.



**Photo No.:** 4

**MP:** 15.80

**Direction:** South

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #24 Site. The ROW and temporary workspaces were restored; with no signs of rutting, large rocks, or construction debris. The site was stable; however, low-lying areas were noted, and crop coverage was generally sparse from approximately MP 15.6 through MP 16.0. WBI reported that planting was likely delayed due to flooding of the ROW through June and that the site would be monitored, with additional repairs to be made if requested by the landowner.



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**Photo No.:** 5

**MP:** 16.35

**Direction:** Northwest

**Assessment:** Acceptable

**Comments:** Agricultural ROW. The ROW was restored; with no signs of rutting, large rocks, or construction debris. The site was stable and well vegetated; however, noxious weeds were common along the ROW from approximately MP 16.2 through MP 16.7. WBI reported that the noxious weed issue would likely be resolved once the landowner disked and replanted spring crops.



**Photo No.:** 6

**MP:** 18.70

**Direction:** North

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #30 Site. Restored areas of the ROW and temporary workspaces were free of rutting, erosion, and large rocks; however, crop coverage was generally sparse in what appeared to be an area of subsidence. WBI noted that some subsidence repairs were completed in the spring of 2025 and may have included this location. WBI also stated that the site would be monitored, with additional repairs made if requested by the landowner.

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**Photo No.:** 7

**MP:** 23.35

**Direction:** South

**Assessment:** Acceptable

**Comments:** Aboveground Facility, Valve #3 Site. Temporary workspaces were restored and stabilized with mulch or hydroseed. The station was stabilized with gravel and was free of ruts and excessive erosion. Perimeter fencing was in place per Project plans, according to WBI. Stormwater control measures were installed, and outlets were stabilized with large rock.



**Photo No.:** 8

**MP:** 24.70

**Direction:** North

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #33 Site. The ROW was restored with no signs of rutting, large rocks, or construction debris. However, sparse vegetation and possible subsidence were observed within restored areas of the ROW and temporary workspaces. WBI noted that the site would be monitored, with additional repairs made if requested by the landowner.



# FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

**Company:** WBI Energy

**Docket Nos.:** CP22-466-000

**Project:** Wahpeton Expansion

**Spread:** Wahpeton Lateral



**Photo No.:** 9

**MP:** 25.65

**Direction:** East

**Assessment:** Acceptable

**Comments:** Agricultural ROW. The ROW was restored with no signs of rutting, large rocks, or construction debris. The site was stable; however, crop coverage was generally sparse. WBI reported that planting was likely delayed due to anomaly repairs and that the site would be monitored, with additional repairs made if requested by the landowner.



**Photo No.:** 10

**MP:** 30.35

**Direction:** South

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #38 Site. The temporary workspaces were restored and free of rutting, large rocks, and construction debris. However, several sparsely vegetated low-lying areas were observed. WBI indicated that the landowner had placed flags to mark areas requiring repairs, which WBI stated would be repaired after the harvest.



**FEDERAL ENERGY REGULATORY COMMISSION  
PHOTOGRAPHIC RECORD**

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**Project:** Wahpeton Expansion

**Spread:** Wahpeton Lateral



**Photo No.:** 11

**MP:** 31.35

**Direction:** North

**Assessment:** Acceptable

**Comments:** Aboveground Facility, Valve #4 Site. The valve site, permanent access road, and adjacent temporary workspaces were restored; stabilized with gravel, mulch, or hydroseed; and were free of rutting and erosion. Facility fencing was not required at this valve, according to WBI. Stormwater management measures were installed, and the outlet was stabilized with rock to prevent scouring.



**Photo No.:** 12

**MP:** 33.45

**Direction:** South

**Assessment:** Acceptable

**Comments:** Open ROW, Wetland wrib007e. Wetland contours appeared to be adequately restored, and the wetland was densely revegetated. The adjacent upland ROW was well vegetated and free of rutting, erosion, and construction debris. Temporary ECDs remained in place along the wetland boundary.



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**Photo No.:** 13

**MP:** 36.13

**Direction:** Northwest

**Assessment:** Acceptable

**Comments:** Open ROW, Wetland wrib019e. Wetland contours appeared to be adequately restored, and the wetland was stabilized with mulch per state requirements, according to WBI. Temporary ECDs remained in place along the wetland boundary.



**Photo No.:** 14

**MP:** 38.55

**Direction:** West

**Assessment:** Acceptable

**Comments:** Agricultural ROW. Agricultural crops were well established along the restored ROW and within temporary workspaces. Restored areas appeared to be stable and free of erosion and large rocks. Pipeline markers were installed. Nearby road crossings were restored to stable conditions, with no signs of construction debris or pavement damage.



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**Photo No.:** 15

**MP:** 45.85

**Direction:** South

**Assessment:** Acceptable

**Comments:** Agricultural ROW. The ROW was restored with no signs of rutting, large rocks, or construction debris. The site was stabilized with mulch; however, vegetation coverage was sparse. WBI reported that the ROW in this general vicinity was reseeded with a special conservation seed mix, per state requirements, and that it would be reseeded in late-summer.



**Photo No.:** 16

**MP:** 47.40

**Direction:** East

**Assessment:** Acceptable

**Comments:** Agricultural ROW. The ROW was restored with no signs of rutting, large rocks, or construction debris. The site was stable; however, crop coverage was generally sparse from approximately MP 46.90 through MP 47.50. WBI reported that planting was likely delayed due to anomaly repairs and that the site would be monitored, with additional repairs made if requested by the landowner.



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**Photo No.:** 17

**MP:** 48.90

**Direction:** Northwest

**Assessment:** Acceptable

**Comments:** Aboveground Facility, Valve #6 Site. Temporary workspaces were restored and stabilized with mulch or hydroseed. The station was stabilized with gravel and was free of ruts and excessive erosion. Facility fencing was not required at this valve, according to WBI. Stormwater control measures were installed. Rock staged on the permanent access road will be placed at the culvert outlet to prevent scouring, according to WBI.



**Photo No.:** 18

**MP:** 51.90

**Direction:** West

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Temporary Access Road AR-56.1. The construction entrance and access road into the former Wild Rice River horizontal directional drilling (HDD) site were restored to original contours and slopes were stabilized with erosion control blanket. The site was free of construction debris. No pavement damage was observed on the adjacent public roadway.



# FEDERAL ENERGY REGULATORY COMMISSION PHOTOGRAPHIC RECORD

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**Photo No.:** 19

**MP:** 57.05

**Direction:** North

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #69 Site. The ROW and temporary workspaces for the Bore #69 crossing were restored, with no signs of rutting, large rocks, or construction debris. However, rill erosion was observed, resulting in sediment transport into a densely vegetated roadside stormwater swale. The accumulated sediment appeared to be contained within the approved workspace limits. Following the inspection, WBI reported that it monitored the site until temporary ECDs were added on or shortly before July 29, 2025 (see Photo No. 20). WBI stated that the delay was due to wet weather and saturated soil conditions.



**Photo No.:** 20

**MP:** 57.05

**Direction:** North

**Assessment:** Acceptable

**Comments:** Agricultural ROW, Bore #69 Site. In a July 29, 2025 email, WBI stated that it installed a temporary straw waddle across the downslope end of the vegetated roadside stormwater swale to help contain sediment within the swale. WBI reported that it monitored the site until the waddle was installed on or shortly before July 29, and that the water in the swale had not migrated, so no sediment had been transported downstream. The disturbed area was later seeded and stabilized with an erosion control blanket, according to a July 31, 2025 update from WBI.



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**Photo No.:** 21

**MP:** 59.00

**Direction:** Southwest

**Assessment:** Acceptable

**Comments:** Aboveground Facility, Valve #7 Site (Wahpeton Border Station). The valve site, permanent access road, and adjacent temporary workspaces were restored; stabilized with gravel, mulch, or hydroseed; and were free of rutting and erosion. Facility perimeter fencing was in place. Stormwater management measures were installed, and the outlets were stabilized with rocks to prevent scouring. WBI stated that the construction equipment and materials on site were being used by contractors completing final stabilization of road embankments.