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November 8, 2024

Debbie-Anne Reese, Secretary  
Federal Energy Regulatory Commission  
888 First Street NE, Room 1A  
Washington, D.C. 20426

Re: WBI Energy Transmission, Inc.  
Wahpeton Expansion Project  
Docket No. CP22-466-000  
Request for Authorization to Place Facilities into Service

Dear Secretary Reese:

On October 23, 2023, the Federal Energy Regulatory Commission (FERC or Commission) issued an Order Issuing Certificate (Order) in the above referenced docket authorizing WBI Energy Transmission, Inc. (WBI Energy) to construct, modify, operate, and maintain its Wahpeton Expansion Project (Project) in Cass and Richland Counties, North Dakota. On February 13, 2024, the Commission authorized WBI Energy to proceed with construction of all Project facilities.

Pursuant to Environmental Condition No. 12 of the Appendix to the Order, WBI Energy respectfully requests the Director of the Office of Energy Projects (OEP), or the Director's designee, grant WBI Energy authorization, no later than November 27, 2024, to place all Project facilities into service to allow the incremental firm transportation service offered by the Project to begin on December 1, 2024.

Environmental Condition No. 12 provides authorization by the Commission to place facilities into service following a determination that rehabilitation and restoration of the right-of-way (ROW) and other areas affected by the Project are proceeding satisfactorily. As reflected in WBI Energy's Weekly Project Status Reports, restoration of the areas impacted by pipeline construction is underway and proceeding satisfactorily. Approximately 95% of the ROW is actively cultivated agricultural land and seeding is not required in cultivated croplands unless requested by the landowner in accordance with the FERC's *Upland Erosion Control, Revegetation, and Maintenance Plan* (Plan) (FERC, 2013a). The remaining ROW will be seeded and stabilized in accordance with the Plan. The next monthly field inspection is scheduled for November 12 and 13, 2024.

As of November 3, 2024, the Project's aboveground facilities are mechanically complete. Facility sites are stabilized and cleanup and restoration is underway and proceeding satisfactorily. Table 1 below summarizes the remaining pipeline and aboveground facility activities and the estimated

dates of completion. WBI Energy intends to complete purging and packing activities to be ready to provide service on December 1, 2024.

Table 1 Summary of Remaining Project Activities		
Facilities	Total % Completion as of November 3, 2024	Remaining Activities and Estimated Date of Completion
<b>Pipeline</b>		
<b>Welding</b>	99%	1/
<b>Joint Coating</b>	99%	1/
<b>Lowering</b>	99%	1/
<b>Backfill</b>	98%	Final backfill will be completed upon final tie-ins.
<b>Cleanup</b>	70%	Final cleanup by 11/30/2024.
<b>Seeding</b>	0%	Seeding will be completed within appropriate seeding windows and in accordance with FERC's Plan.
<b>Hydrostatic Testing</b>	1 of 2	Second test section from Station No. 2632+32 to 3100+00 by 11/22/2024.
<b>Final Tie-in and Commissioning</b>	0%	Final tie-in and commissioning activities by 11/27/2024.
<b>Aboveground Facilities</b>		
<b>Valve Site #2– Pad Construction</b>	96%	2/ 3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>Valve Site #3– Pad Construction</b>	97%	2/ 3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>Valve Site #4– Pad Construction</b>	97%	2/ 3/
<b>Cleanup/Restoration</b>	50%	Excess soil needs to be removed. Seeding of perimeter by 12/4/2024.
<b>Valve Site #5– Pad Construction</b>	96%	2/ 3/
<b>Cleanup/Restoration</b>	90%	Complete topsoil restoration. Seeding of perimeter by 12/4/2024.
<b>Valve Site #6– Pad Construction</b>	97%	2/ 3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>Valve Site #7– Pad Construction</b>	97%	2/ 3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>MDU-Kindred Border Station</b>		
<b>Initial Site Work</b>	98%	3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>Install Security Fence</b>	0%	To be installed the week of 11/4/2024.
<b>MDU-Wahpeton Border Station</b>		
<b>Initial Site Work</b>	98%	3/
<b>Cleanup/Restoration</b>	95%	Seeding of perimeter by 12/4/2024.
<b>Install Security Fence</b>	0%	To be installed the week of 11/4/2024.
1/ Three tie-ins remain and are estimated to be completed by 11/24/2024 after hydrostatic testing is completed. 2/ Remaining electrical and communications work will be completed upon commissioning of the pipeline. 3/ Spreading of remaining gravel estimated to be completed by 11/27/2024 upon completion of valve setting painting and fence installation.		

Because approval from the Director of the OEP, or the Director's designee, to commence service will only be granted following a determination that rehabilitation and restoration of all areas affected by the Project are proceeding satisfactorily, WBI Energy will continue to provide supporting photographic documentation of restoration and rehabilitation progress in the Weekly Project Status Reports. WBI Energy will continue to monitor restoration and address any environmental issues as they arise. Additionally, ongoing inspections of the ROW will occur in accordance with the FERC's Plan and FERC's *Wetland and Waterbody Construction and Mitigation Procedures* (FERC, 2013a) and applicable permit requirements. Upon approval to commence service, WBI Energy will file quarterly activity reports documenting the results of follow-up inspections of all disturbed areas.

WBI Energy has not received any FERC or other agency issued non-compliances or problem areas that have not previously been reported to the Commission in the Weekly Project Status Reports and corrected. WBI Energy has and will continue to work with landowners during clean-up and restoration activities and address any landowner concerns.

Pursuant to 18 CFR § 385.2010 of the Commission's regulations, copies of this request are being served to each person whose name appears on the official service list for this proceeding.

Any questions regarding this filing should be addressed to the undersigned at (701) 530-1563.

Sincerely,

/s/ Lori Myerchin

Lori Myerchin  
Vice President, Regulatory Affairs  
and Transportation Services

cc: via email

David Hanobic, FERC Environmental Project Manager  
Dawn Ramsey, FERC  
Official Service List

## **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 8th day of November, 2024.

By /s/ Lori Myerchin

Lori Myerchin

Vice President, Regulatory Affairs and  
Transportation Services

WBI Energy Transmission, Inc.

1250 West Century Avenue

Bismarck, ND 58503

Telephone: (701) 530-1563

STATE OF NORTH DAKOTA     )  
COUNTY OF BURLEIGH     )

I, Lori Myerchin, being first duly sworn, do hereby depose and say that I am the Vice President, Regulatory Affairs and Transportation Services 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 8<sup>th</sup> day of November, 2024.

By *Lori Myerchin*  
Lori Myerchin  
Vice President, Regulatory Affairs and  
Transportation Services

Subscribed and sworn to before me this 8<sup>th</sup> day of November, 2024.

*Kathleen Schuster*  
Kathleen Schuster, Notary Public  
Burleigh County, North Dakota  
My Commission Expires: 5/31/2026

