



FEDERAL ENERGY REGULATORY COMMISSION FIELD INSPECTION REPORT

Date November 12 and 13, 2024

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 Project Manager: David Hanobic
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>	Noncompliance
<u>No</u>	Follow-Up Letter Required
<u>No</u>	Refer to Enforcement

Introduction

On November 12 and 13, 2024, the FERC Project Manager, David Hanobic, and Stacie Grove of NewEarth Ecological, subcontractor to Tetra Tech, performed an in-service 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, David Hanobic.

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 pig¹ 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 will also include the installation of two farm taps along the pipeline route.

Currently, the anticipated in-service date for the Project is 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 construction and 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 November 12, 2024, weather conditions were partly cloudy, with strong winds and temperatures ranging from the low-30s (°F) to the mid-40s (°F) in nearby Fargo, North Dakota. Weather conditions during the second day of the inspection (November 13, 2024) were cloudy with light drizzle at times, with moderate winds and temperatures ranging from the mid-30s (°F) to the mid-40s (°F). The Project area received approximately 0.6 inch of precipitation during the two weeks preceding the inspection, according to data collected at the Fargo Hector International Airport. Soil conditions were stable.

The first day of the inspection (November 12, 2024; Photo Numbers [Nos.] 1 through 17) began at the existing WBI Mapleton Station, continued south along the Project ROW, and ended at the Valve #6 site, (Milepost [MP] 48.85), just north of where active hydrostatic pressure testing was in progress. The second day of the inspection (November 13, 2024; Photo Nos. 18 through 22) began at the new Wahpeton Border Station site at the southern terminus of the Project (MP 59.00), continued north along the ROW, and ended at the Wild Rice River horizontal directional drill (HDD) crossing (MP 51.35).

WBI reported that there were no outstanding landowner concerns since the previous inspection on October 15 and 16, 2024, except for minor punchlist items. Items being addressed mostly included the removal of construction materials and erosion control devices (ECDs) from agricultural areas and public road entry points.

At the time of inspection, hydrostatic pressure testing had been completed without incident on the section of pipeline from MP 0.00 to MP 49.90 and was in progress on the remaining segment of the pipeline to the south. According to WBI, pipe drying and all final tie-ins would be complete by November 27, 2024, and the Project would be ready for commissioning by December 1, 2024. Final grading and restoration were complete along approximately 95 percent of the pipeline ROW, valve sites, and temporary workspaces (Photo Nos. 1, 6, 9 through 12, 16, 17, 20, and 21). Some exceptions included an approximately 1.2-mile-long section of ROW between MP 35.60 and 36.80, where work had been delayed due to migratory bird nesting (Photo No. 14); an approximately 0.7-mile section of ROW between MP 51.30 and 51.92, where work had been delayed at the Bore #64 HDD crossing of the Wild

¹ 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.

Rice River and Antelope Creek due to a bore hole collapse (Photo No. 19); and some remaining areas within and around valve sites, where construction activities were still in progress (Photo Nos. 13, 15, 17, and 22).

According to WBI at the time of inspection, over 100 anomalies were recently identified in the installed pipeline, requiring contractors to re-enter previously restored (where topsoil had been reapplied) areas of the ROW (Photo Nos. 3, 4, 7, and 8). Anomalies were reportedly superficial in the pipe coating; therefore, removal of the pipe would not be necessary to complete the repairs. However, according to WBI, inspection for anomalies had not yet been completed on the segment of pipeline that was currently being hydrostatically pressure tested, south of approximately MP 49.00 to the Valve #7 site at MP 59.00. To assist with the in-service request assessment and evaluation of remediation and restoration efforts, WBI was asked to provide the inspector and FERC Project Manager with details on the number of anomalies to be addressed and to give periodic updates on the number of repairs completed.

Overall, the environmental conditions along the inspected areas of the ROW were satisfactory. In areas of active construction, including anomaly repair areas, the approved ROW and workspace limits were adequately marked, and all observed construction activities were within approved workspace limits (Photo Nos. 3 through 5, 7 through 9, 13 through 15, 17, 19, and 22). Along areas requiring topsoil segregation, topsoil was properly segregated, stockpiled within approved ROW limits, and appeared to be adequately stabilized (Photo Nos. 4, 7, 8, 13, and 19). ECDs, primarily consisting of silt fence or fiber logs, were installed where appropriate and properly maintained (Photo Nos. 4, 5, 7, 13, 14, and 22). At construction entrances and road crossings, safety flagging and wooden access pads were properly installed and maintained, and no tracking of mud or debris onto public roads was observed (Photo Nos. 2, 5, 7, 9, and 22). No environmental concerns were identified.

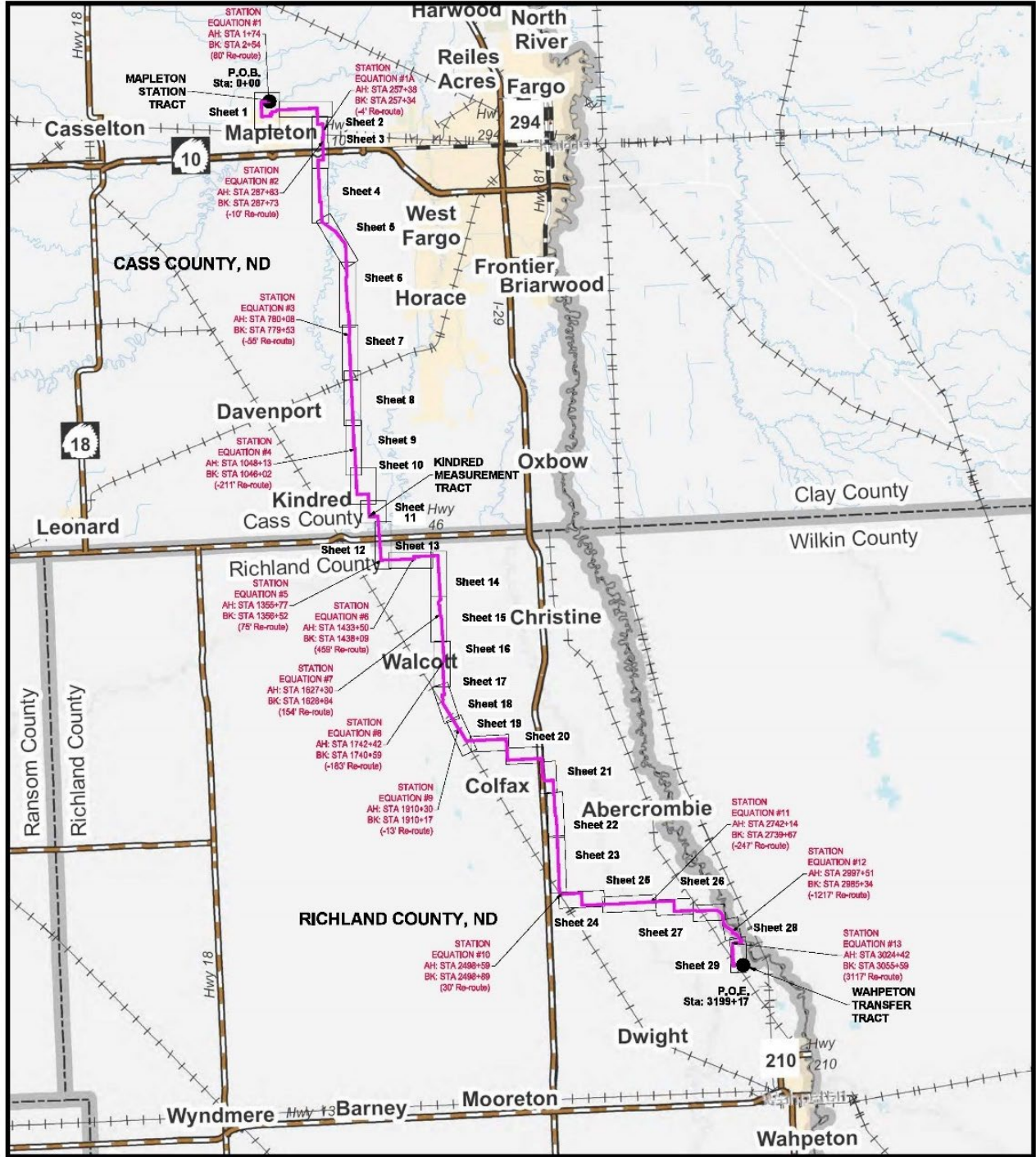
Along the restored ROW and temporary workspaces, primarily crossing agricultural land, topsoil was replaced, decompacted, and seeded according to landowner specifications, as reported by WBI (Photo Nos. 1, 3 through 6, 9 through 12, 16, 17, 20, and 21). The contours appeared effectively restored, with no large rocks, construction debris, or signs of erosion observed. ECDs were appropriately maintained until successful revegetation of the surrounding areas was achieved or, in active croplands, removed at the landowner's request (Photo Nos. 6 and 11). At restored agricultural wetlands, contours appeared to be restored to pre-construction conditions and were similar to conditions within adjacent active cultivated lands (Photo No. 4). Temporary ECDs remained in place where appropriate in some restored agricultural wetlands, swales, and roadside drainage ditches to prevent sediment transport outside of approved workspace limits (Photo Nos. 4, 5, 7, and 21). No environmental concerns were identified. All non-agricultural wetlands and waterbodies were crossed using guided bores, according to WBI, and restoration was not needed.

Most construction debris and equipment had been cleared from restored areas; however, some materials remained staged at access points near public roadways (Photo No. 10, 12, 20, and 21). WBI stated that these materials would be removed, with the areas restored once it was confirmed that no further entry would be required for anomaly repairs. ECDs, including silt fence, hay bales, and fiber logs, remained in place in wooded, well-vegetated areas near the Wild Rice River crossing, where inadvertent releases (IR) of drilling mud had occurred (Photo No. 18). The IR sites appeared to have been adequately contained, with released materials removed in compliance with WBI's Guided Bore Drilling Fluid Monitoring and Operations Plan. Consequently, WBI was directed to remove ECDs at all IR locations that were sufficiently stabilized as part of ongoing cleanup efforts at the Antelope Creek and Wild Rice River HDD sites.

Conclusions and Recommendations

A follow-up letter is not required at this time, because no instances of noncompliance were identified. Overall, cleanup and restoration were proceeding satisfactorily, environmental conditions were acceptable, and no environmental concerns were identified. However, the number and extent of anomaly repair areas may delay final restoration. WBI was asked to provide the inspector and FERC Project Manager with details on anomalies and photographic documentation of progress with cleanup and restoration at the Wild Rice River crossing HDD site. The next inspection is recommended for the week of December 9, 2024, to assess restoration efforts at active construction areas and anomaly repair sites, but may be waived at the discretion of the FERC Project Manager.

Site Map



**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 1

MP: 0.00

Direction: Northwest

Assessment: Acceptable

Comments: Aboveground Facility, Valve #1 Site. Construction of the valve was complete, except for final connection of the spool. The adjacent ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and construction debris. The adjacent Wahpeton Station was mechanically complete. No environmental concerns were identified.



Photo No.: 2

MP: NA

Direction: West

Assessment: Acceptable

Comments: Aboveground Facility, Contractor Yard. The entry to the existing contractor yard was well maintained, and the road was free of tracked mud and debris. The yard surface was stable and free of excessive rutting and erosion. According to WBI, construction equipment and materials would be removed from the yard, minor improvements would be made where needed, and the yard would be released back to the owner. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 3

MP: 7.62

Direction: North

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces had been restored and decompacted, with no signs of rutting, large rocks, or construction debris. However, the area was subsequently re-disturbed to address an anomaly. A spotter was present but was observing the ROW side of the excavation and not the LOD where a small amount of material was observed beyond the LOD. The inspector reminded the spotter to monitor soil placement to ensure that construction materials remained within LOD.



Photo No.: 4

MP: 8.92

Direction: Northwest

Assessment: Acceptable

Comments: Agricultural ROW, Agricultural Wetland wcaa005e. The ROW and temporary workspaces had been restored, but the area was subsequently re-disturbed to address an anomaly. ECDs were in place along an agricultural wetland while an anomaly repair was in progress nearby. ROW limits were marked with stakes and flagging in the active construction area, and resource identification flags were in place. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 5

MP: 11.65

Direction: Northeast

Assessment: Acceptable

Comments: Aboveground Facility, Valve #2 Site. Work at the valve site included pad construction, perimeter fence installation, valve settings and equipment painting, and final cleanup and restoration within and around the site. The dewatering structure appeared to be adequately designed, with no evidence of sediment release outside of the approved workspace. ECDs remained in place. The public road access points were well maintained, and WBI stated that the landowner requested that a temporary access road be left in place.



Photo No.: 6

MP: 13.18

Direction: Northwest

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and construction debris. Some wooden stakes remained in place along restored, flat, agricultural areas and would be removed upon landowner request as part of the final cleanup punch list items. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 7

MP: 13.71

Direction: Southeast

Assessment: Acceptable

Comments: Agricultural ROW. The road access point remained in place, pending completion of nearby anomaly repairs. Resource identification signs were in place, and the ROW limits in active construction areas were marked with stakes and flagging. The site was stable with no environmental concerns identified. The road entry point was well maintained, and, although somewhat muddy, conditions were similar to the adjacent unimproved public roadway.



Photo No.: 8

MP: 21.85

Direction: Southwest

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces had been restored and decompacted, with no signs of rutting, large rocks, or construction debris. However, the area was subsequently re-disturbed to address an anomaly. ROW limits in active construction areas were marked with stakes and flagging. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 9

MP: 23.40

Direction: Southwest

Assessment: Acceptable

Comments: Aboveground Facility, Valve #3 Site. Work at the valve site was nearing completion, with only minor pad stabilization, painting, and restoration of small areas within the temporary workspace remaining. An anomaly repair was underway on the nearby restored ROW. The access point to the public roadway was well maintained, with no tracked mud or construction materials present on the road. No environmental concerns were identified.



Photo No.: 10

MP: 24.22

Direction: W

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and construction debris, except near the access point to the public roadway. According to WBI, construction debris and materials would be removed and the area restored pending confirmation that no re-entry would be needed into the area for anomaly repair.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 11

MP: 26.60

Direction: West

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and construction debris. According to WBI, some ECDs remained in place at low-lying areas along the edge of the ROW and would be removed upon landowner request as part of the final cleanup punch list items. No environmental concerns were identified.



Photo No.: 12

MP: 30.35

Direction: Northeast

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and evidence of erosion. According to WBI, the construction materials and access point onto the adjacent unimproved public road would be removed and the area restored once confirmation was received that no further re-entry for anomaly repair would be required.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral

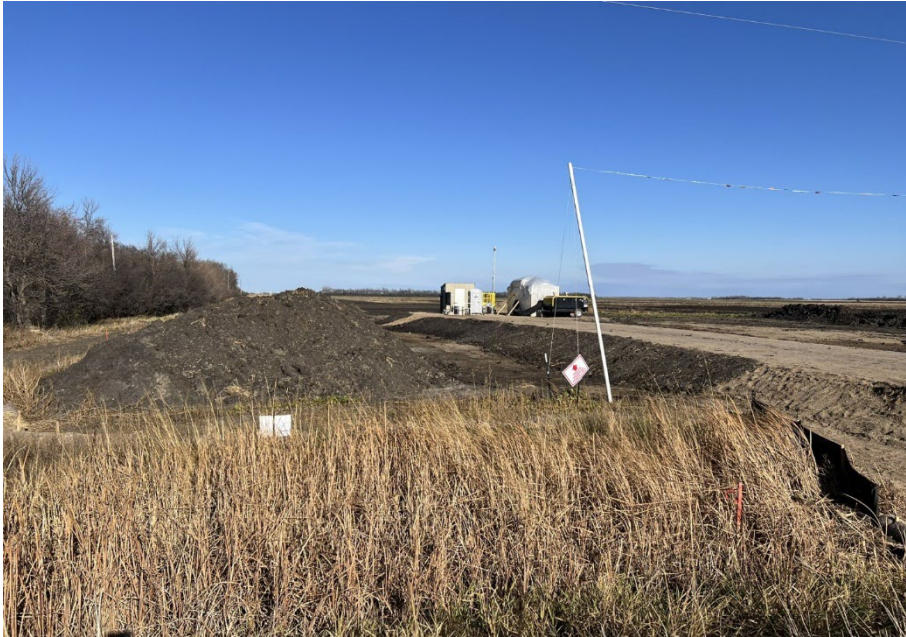


Photo No.: 13

MP: 31.35

Direction: West

Assessment: Acceptable

Comments: Aboveground Facility, Valve #4 Site. Work at the valve site included pad construction, perimeter fence installation, valve settings and equipment painting, and final cleanup and restoration within and around the valve site. Workspace limits were well marked, and topsoil remained properly segregated and staged within workspace limits. ECDs were in place around the staged topsoil. The adjacent ROW was restored. No environmental concerns were identified.



Photo No.: 14

MP: 36.05

Direction: South

Assessment: Acceptable

Comments: Forested ROW, Wetland wria006e. Cleanup and restoration were in progress along this section of ROW from MP 35.60 to 36.80; where construction had been delayed due to migratory bird restrictions. Resource identification signs were in place. ECDs were installed and were well maintained. Protective mats were in place to prevent rutting within the resource and were installed in a manner that prevented upland soil from entering the resource. No environmental concerns were observed.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 15

MP: 39.50

Direction: East

Assessment: Acceptable

Comments: Aboveground Facility, Valve #5 Site. Work at the valve site included pad construction, perimeter fence installation, valve settings and equipment painting, and final cleanup and restoration within and around the valve site. Topsoil was restored along temporary workspaces, but final grading and decompaction were pending. Wooden stakes remained in place to identify the workspace limits in areas of active construction. No off-ROW impacts or other environmental concerns were identified.



Photo No.: 16

MP: 40.90

Direction: Northwest

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspace at the bore crossing site for Interstate 29 were restored, decompacted, and free of rutting, large rocks, and construction debris. Wooden stakes and temporary ECDs were removed, per landowner request. The site was stable with no environmental concerns identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 17

MP: 48.90

Direction: North

Assessment: Acceptable

Comments: Aboveground Facility, Valve #6 Site. The valve was mechanically complete, and only minor work remained, including painting, some electrical work, perimeter fence installation, and final restoration of adjacent temporary workspaces around the facility. Workspace limits in active construction areas were well marked. No environmental concerns were identified.



Photo No.: 18

MP: 51.32

Direction: Northwest

Assessment: Acceptable

Comments: Aboveground Facility, Red River HDD Site. Areas of inadvertent releases appeared to have been adequately contained, with IR material removed per WBI's Guided Bore Drilling Fluid Monitoring and Operations Plan. Therefore, WBI was asked to remove the remaining ECDs as part of cleanup of the adjacent HDD entry site and ROW and to provide photographic evidence to the FERC Project Manager that all materials had been removed.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 19

MP: 54.95

Direction: West

Assessment: Acceptable

Comments: Agricultural ROW, Bore #64 HDD Site. The HDD crossing was complete, and the trench was backfilled approximately 10 to 14 days ago, according to WBI. Cleanup and restoration were underway but incomplete along an approximately 0.7-mile-long portion of the ROW between MP 51.30 and MP 51.92. Topsoil remained properly segregated along the ROW edge, and no off-ROW impacts or environmental concerns were identified. WBI was asked to provide the FERC Project Manager with restoration progress updates for this section of ROW.



Photo No.: 20

MP: 54.95

Direction: West

Assessment: Acceptable

Comments: Agricultural ROW. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and evidence of erosion. According to WBI, the construction materials and nearby access point onto the adjacent unimproved public road would be removed, with the area restored, once confirmation was received that no further re-entry for anomaly repair would be required. No environmental concerns were identified.

**FEDERAL ENERGY REGULATORY COMMISSION
PHOTOGRAPHIC RECORD**

Company: WBI Energy

Docket Nos.: CP22-466-000

Project: Wahpeton Expansion Project

Spread: Wahpeton Lateral



Photo No.: 21

MP: 56.95

Direction: Southwest

Assessment: Acceptable

Comments: Agricultural ROW. A tap was installed at this location, per landowner request. The ROW and temporary workspaces were restored, decompacted, and free of rutting, large rocks, and evidence of erosion. According to WBI, the construction materials and access point onto the adjacent unimproved public road would be removed, with the area restored, once confirmation was received that no further re-entry for anomaly repair would be required. No environmental concerns were identified.



Photo No.: 22

MP: 59.00

Direction: West

Assessment: Acceptable

Comments: Aboveground Facility, Valve #7 Site. The valve was mechanically complete, and only minor work remained, including pad completion, painting, electrical work, perimeter fence installation, and final restoration of temporary workspaces. Construction along the east side of the valve site was associated with Montana-Dakota Utilities (local gas delivery provider). The construction access point was well maintained, and the public road was free of tracked mud and construction debris. The site was stable, with no environmental concerns identified.