



WILLISTON BASIN
INTERSTATE PIPELINE COMPANY
A Subsidiary of MDU Resources Group, Inc.

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May 2, 2008

North American Energy Standards Board
Cory Galik, Project/Meeting Manager
1301 Fannin, Suite 2350
Houston, TX 77002

RE: Comments on Proposed NAESB Standard No. 1.3.x1

Dear Mr. Galik:

Williston Basin Interstate Pipeline Company (Williston Basin) is hereby submitting its comments to the WGQ EC members for their consideration before reviewing and considering the proposed Standard No. 1.3.x1 for vote.

Williston Basin contracts for capacity on its system on a path basis, but once that capacity is contracted for, such contract paths are not used in the scheduling of the daily flow of gas. On Williston Basin's system, a requirement that an alternate point within the path holds a higher priority than an alternate point outside the path would require the physical pathing of daily gas flows.

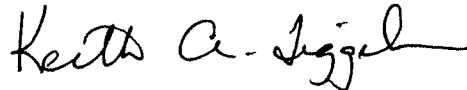
Being a reticulated pipeline system, Williston Basin uses displacement for the actual physical flow of gas among the many receipt and delivery points rather than the contracted for capacity path. A shipper's physical flowing path is not readily and consistently identifiable on a daily basis. The ultimate flow path may involve several displacements that may change frequently. Furthermore, because Williston Basin operates its system by displacement, Williston Basin cannot dedicate specific physical flow paths to specific shippers without the potential of severely reducing the reliability and flexibility of existing service to its firm shippers.

The Federal Energy Regulatory Commission (FERC) has accepted Williston Basin's treatment of alternate points as reasonable, per its Order on Rehearing and Compliance Filing dated June 17, 2002, in Williston Basin's Docket No. RP00-463-000, et al. proceeding. The FERC agreed that on Williston Basin's reticulated system, there are no physical paths and thus no way of identifying or giving priority to alternate points within a path.

Therefore, Williston Basin believes that a provision should be incorporated into the proposed standard that if the FERC has previously exempted reticulated pipeline systems from within-the-path scheduling requirements, this standard would not apply to such pipeline systems.

Thank you for allowing Williston Basin to submit its comments. If you have any questions, please call the undersigned at 701-530-1560.

Sincerely,



Keith A. Tiggelaar
Director of
Regulatory Affairs