

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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HP 14-001

IN THE MATTER OF THE PETITION OF :
TRANSCANADA KEYSTONE PIPELINE, LP :
FOR ORDER ACCEPTING CERTIFICATION :
OF PERMIT ISSUED IN DOCKET HP09-001 :
TO CONSTRUCT THE KEYSTONE XL :
PIPELINE :

AMENDED REBUTTAL
TESTIMONY OF
MEERA KOTHARI

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Pursuant to the Commission's Order Granting Motion to Define Issues and Setting Procedural Schedule, Petitioner TransCanada Keystone Pipeline, LP, offers the following rebuttal testimony of Meera Kothari.

1. Please state your name and occupation.

Answer: Meera Kothari

2. Did you provide direct testimony in this proceeding?

Answer: Yes.

3. To whose direct testimony are you responding in your rebuttal testimony?

Answer: I am responding to the direct testimony of Dr. Arden Davis.



4. Dr. Davis' testimony (p. 4) discusses concerns involving the stability of steep slopes where Pierre Shale or other expansive clays, such as bentonite, can "absorb large amounts of water during wet periods, leading to instability and potential failure," and subsequent surface water contamination. How will Keystone address these concerns?

Answer: Ground movement, including landslides, seismic events and subsidence, and heavy rains and flooding, account for a very small percentage (1.08%) of pipeline incidents (PHMSA 2008). To prevent pipeline damage, Keystone considered slope stability during the routing and design process. Once the pipeline is operating, Keystone will conduct aerial patrols to monitor the pipeline right-of-way for signs of slope instability as well as other threats to pipeline integrity. This surveillance is required by Federal Regulation at 49 CFR 195.412. Keystone continually evaluates slope stability over the life of the pipeline. If Keystone suspected damage to the pipeline's integrity, Keystone would inspect the pipeline as required by PHMSA Special Condition 53c.

Dated this 24 day of July, 2015.



Meera Kothari

CERTIFICATE OF SERVICE

I hereby certify that on the 27th day of July, 2015, I sent by United States first-class mail, postage prepaid, or e-mail transmission, a true and correct copy of the foregoing Amended Rebuttal Testimony of Meera Kothari, to the following:

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