

February 5, 1998

Rae McQuade, Executive Director
Gas Industry Standards Board
1100 Louisiana, Suite 4925
Houston, TX 77002

Dear Ms. McQuade:

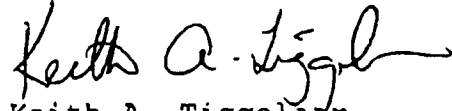
Williston Basin Interstate Pipeline Company respectfully submits its comments relating to recommended interpretation C97017 and recommended standard modifications on requests R97022, R97057B, R97108A and R97115. GISB requested that such industry comments be received by the GISB office by February 5, 1998.

Standard R97022 proposes to add two new data elements, Upstream Package ID and Downstream Package ID, to datasets 1.4.1, 1.4.3, 1.4.4, 1.4.5 and 1.4.6. Williston Basin does not know or understand how these data elements will benefit Williston Basin or the gas pipeline industry. Therefore, Williston Basin opposes the proposed addition of the new data elements to such datasets due to the system programming required to map such new data elements.

Williston Basin believes that current data elements such as Package ID, Nominator's Tracking Number, Downstream Contract Identifier, Downstream Identifier Code, Upstream Contract Identifier, Upstream Identifier Code, and Associated Contract could be used to accomplish the same purpose proposed by the Upstream Package ID and Downstream Package ID. In addition, it appears to Williston Basin that these new proposed data elements may be used for some sort of title-tracking service which is an issue that has not been decided by either GISB or the Commission and is a service Williston Basin is not prepared to offer at this time.

Williston Basin appreciates the opportunity to comment on the recommended interpretation and standards.

Sincerely,

A handwritten signature in black ink, appearing to read "Keith A. Tiggelaar". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Keith A. Tiggelaar
Manager
Regulatory Affairs