



## Energy Facility Permitting

85 7<sup>th</sup> Place East, Suite 500  
St. Paul, Minnesota 55101-2198  
1.800.657.3794 / 651.296.4026  
FAX 651.297.7891 TTY 651.297.3067  
<http://energyfacilities.puc.state.mn.us>

September 11, 2007

Ms. Kathleen M. Brennan, Attorney  
McGrann Shea  
800 Nicollet Mall  
Suite 2600  
Minneapolis, Minnesota 55402-7035

RE: Information Request  
PUC Docket No. PL E280/GP-06-1481

Dear Ms. Brennan,

Per our telephone conversation, I am enclosing information on the Department's request for additional information on the abandoned pipeline.

A photograph of the underground utility marker and map (figure D-25 from the pipeline application) indicating the location in which the photograph was taken is enclosed. The Department is requesting that the applicant provide, at a minimum, the following information regarding this abandoned pipeline:

- Past and current ownership of the ROW;
- Previous function and usage (i.e., product, product supplier, end user);
- Pipeline specifications and map illustrating the full ROW (i.e., diameter, construction material, ROW width and length, beginning and termination points, depth, etc.);
- An evaluation of this "existing" ROW and its ability to serve as a corridor to supply natural gas to the NPUC.

The 70 day comment period for the consideration of alternative routes ends on October 15, 2007; in an effort to maintain the proposed schedule, the Department is asking that you submit your response by that date. If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,



William Cole Storm, DOC-EFP



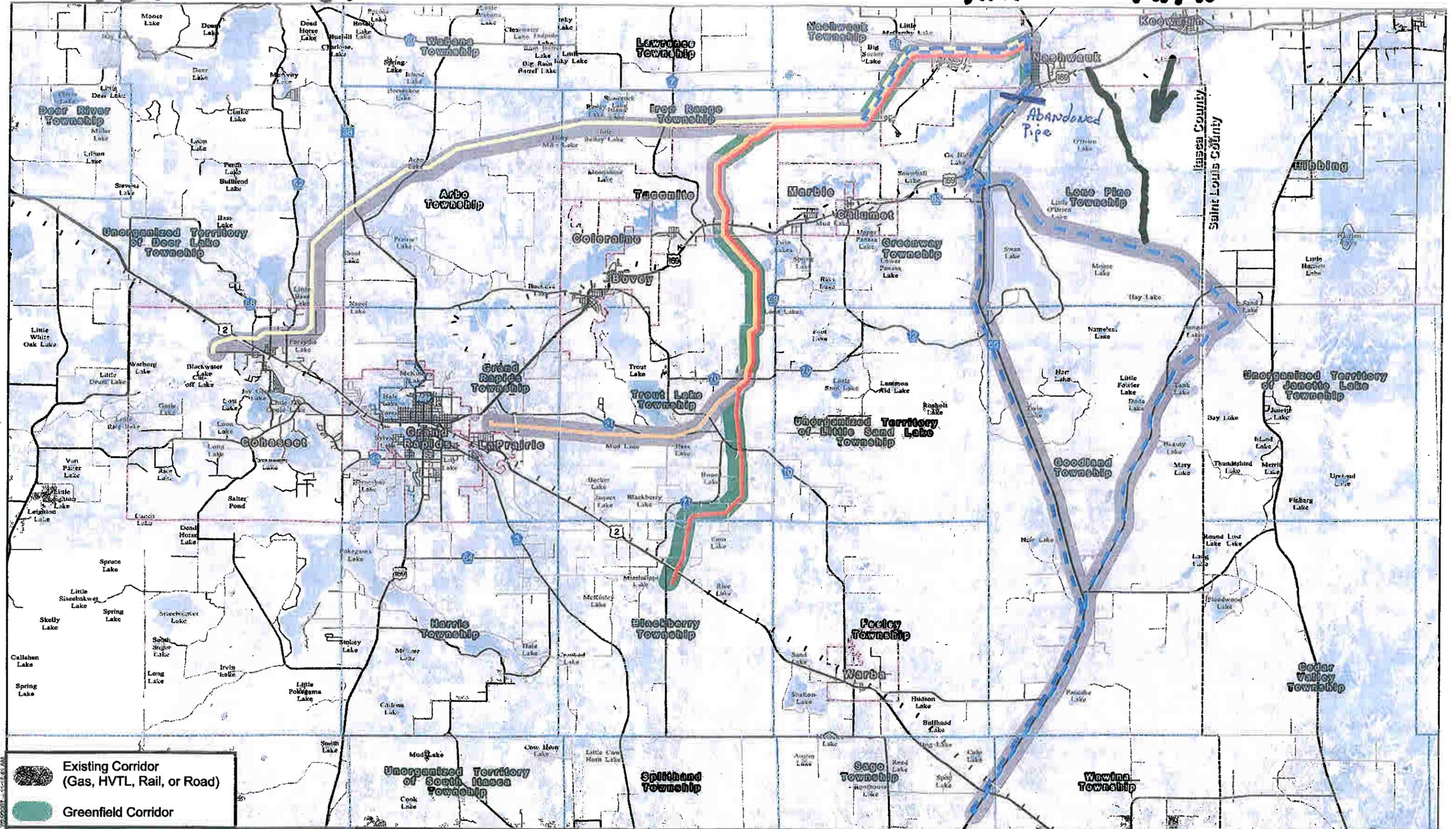
**Caution**  
**ABANDONED**  
**PIPE**  
**IN THIS AREA**

For Emergencies call: 1-888-367-0671  
Before grading or digging in this area call:  
MN ONE CALL: 1-800-252-1166  
WI ONE CALL: 1-800-242-9511  
MI ONE CALL: 1-800-482-7171



Northern Natural  
Gas Company

Enron Transportation & Storage



Map Document: (S:\KONW\ashu070\00G\WNPUC\Permit Supplement Alternatives Analysis - 5 Alignments - CORRIDOR CLASS 11x17 L.mxd)

Existing Corridor (Gas, HVTL, Rail, or Road)

Greenfield Corridor

3535 VADNAIS CENTER DR.  
ST. PAUL, MN 55110  
PHONE: (651) 490-2000  
FAX: (651) 490-2150  
WATTS: 800-325-2055  
www.sehinc.com

**City of Nashwaug  
Public Utilities  
Commission**

July 2007

**Legend**

- 2005 Itasca County/MSI - Alternative 1 (05-ICMSI-1)
- 2005 Itasca County/MSI - Alternative 2 (05-ICMSI-2)
- 2005 Itasca County/MSI - Alternative 3 (05-ICMSI-3)
- 2007 NPUC/MNFUC Citizen's Route - Alternative P1 (07-MNPUC-P1)
- 2007 NPUC/MNFUC Citizen's Route - Alternative P2 (07-MNPUC-P2)
- MN Steel Plant Layout
- Existing Roads
- Existing Rail Lines
- Municipal Boundaries
- Civil Township Boundaries
- County Boundaries

Source: NAIP 2003 & 2006, Itasca County, USGS, Mn/DOT, LMIC-EOB, Barr, MN Steel, and SEH © 2007 SEH

**Nashwaug-Blackberry  
Pipeline Project**

**Route Corridor  
Existing vs. Greenfield  
Classification**

Itasca County - South  
Coordinate System

D - 25

0 2.5 Miles



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September 17, 2007

Ms. Kathleen M. Brennan, Attorney  
McGrann Shea  
800 Nicollet Mall  
Suite 2600  
Minneapolis, Minnesota 55402-7035

RE: Information Request #2  
PUC Docket No. PL E280/GP-06-1481

Dear Ms. Brennan,

I recently received a citizen request for consideration of a potential alternative pipeline route (i.e., Karna Alternative Route). After reviewing the information I believe a “fatal flaw” analysis is warranted to determine if there are any items or issues within this route alternative that would eliminate this route from future consideration (i.e., mining deposit/activity, bedrock geology, prohibited areas, etc).

The Department EFP staff is requesting that the applicant provide a cursory review/evaluation of this potential route alternative for fatal flaws that would eliminate this route from further, detailed consideration (i.e., comparative environmental analysis and public hearing).

I am enclosing the information that was provided to the Department. In your response, please include an illustrated series (i.e., Figures D-19 through D-29) along with your text based analysis for the “Karna Alternative Route.”

The 70 day comment period for the consideration of alternative routes ends on October 15, 2007; in an effort to maintain the proposed schedule, the Department is asking that you submit your response by that date. If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,

William Cole Storm, DOC-EFP

Bill Storm

September 8, 2007

Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198



Attn: Sharon Ferguson/Bill Storm/Deborah Pile

Re: PUC Docket No. PL E280/GP-06-1481

ROUTE PROPOSAL

This route would splice off Great Lakes Gas in Section 13 in Blackberry Township to the East of Rice Lake. Proceeding North through Section 12 and intercept an existing HVTL right-of-way in Section 1 and would then follow the HVTL to the East and in Section 5-Feeley Township would turn in a basically Northeasterly direction up to Nashwauk. When this route reaches the Nashwauk area in Section 32, the Nashwauk Public Utilities Commission would have to "fine tune" it to be compatible with the present and future requirements.

I have attempted to find a route that avoids human settlement per Subp. 3-A and use of existing right-of-ways Subp. 3-F under MN Rules Part 4415.0100. This route also utilizes large tracts of Itasca County Tax Forfeited land which should greatly decrease the land acquisition costs. There are nine Sections of tax forfeit land through the route would pass.

In SEH No. A-NASHU0701.00 application page E-26 they outline the disadvantages of pipelines in close proximity to HVTL. This alleged problem can be easily overcome by adjusting my proposed routing away from HVTL in Sections 13, 12, 1, 6 & 18 (see large drawing). These are entire Sections of land (640 acres each)! Any possible harmful effects can be offset by modern technology and costs will be offset by utilizing tax forfeit lands. Enbridge has a pumping station in Blackberry Township adjacent to 24293 US Hwy 2 that is practically under the HVTL and is not encountering any problems. In a phone conversation with Micah Harris (Enbridge Sr. Land & Right-of-Way Specialist) Tel 715-394-1420, Cell 218-591-3370, I asked him about electro-motive forces and he pointed out that they have hundreds of miles of pipeline in Wisconsin that run under HVTL with no problems. Expert information on this topic can be obtained by contacting John Bissell- Cathodic Expert phone 715-394-1417.

I have enclosed SEH map D-23 with my proposed route outlined in red with a red circle at the Great Lakes Gas splice. Also enclosed is a map I generated using Itasca County Plat maps. The map that I generated is not to scale and may contain some inconsistencies that can easily be corrected by SEH and was designed to generate general information about the route not precise technical data. I am not an engineer, just a concerned citizen attempting to propose the most viable route for the pipeline. Adjustments to this route will have to be made but I believe this general routing to be vastly superior to any of the other alternative (and preferred route) outlined by SEH.

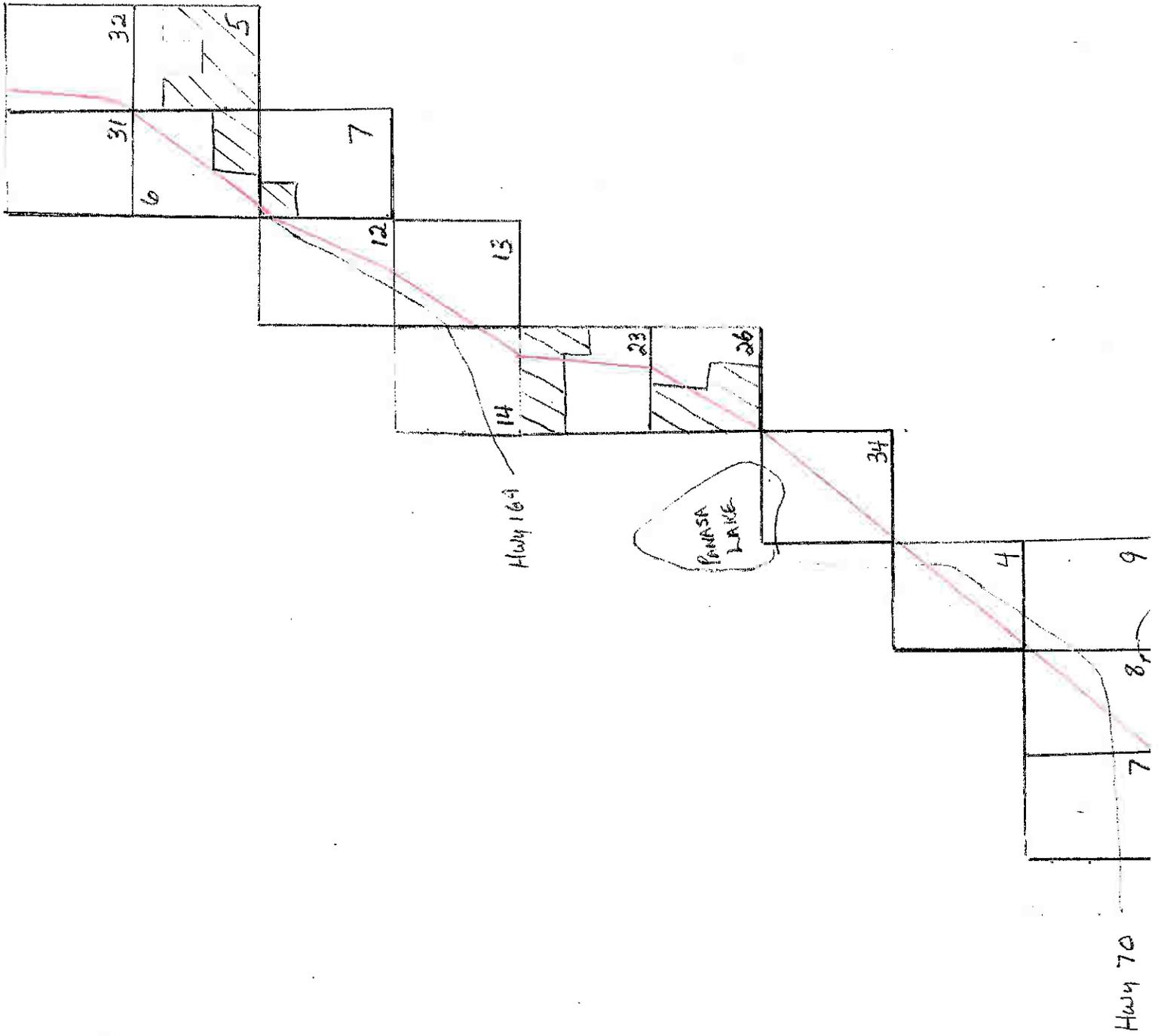
If I understand the procedure-the next step in the process is to pass this proposal on to the Citizens Committee for discussion and hopefully, their approval. Thank you for your time invested in examining this proposal and hopefully your approval as well.

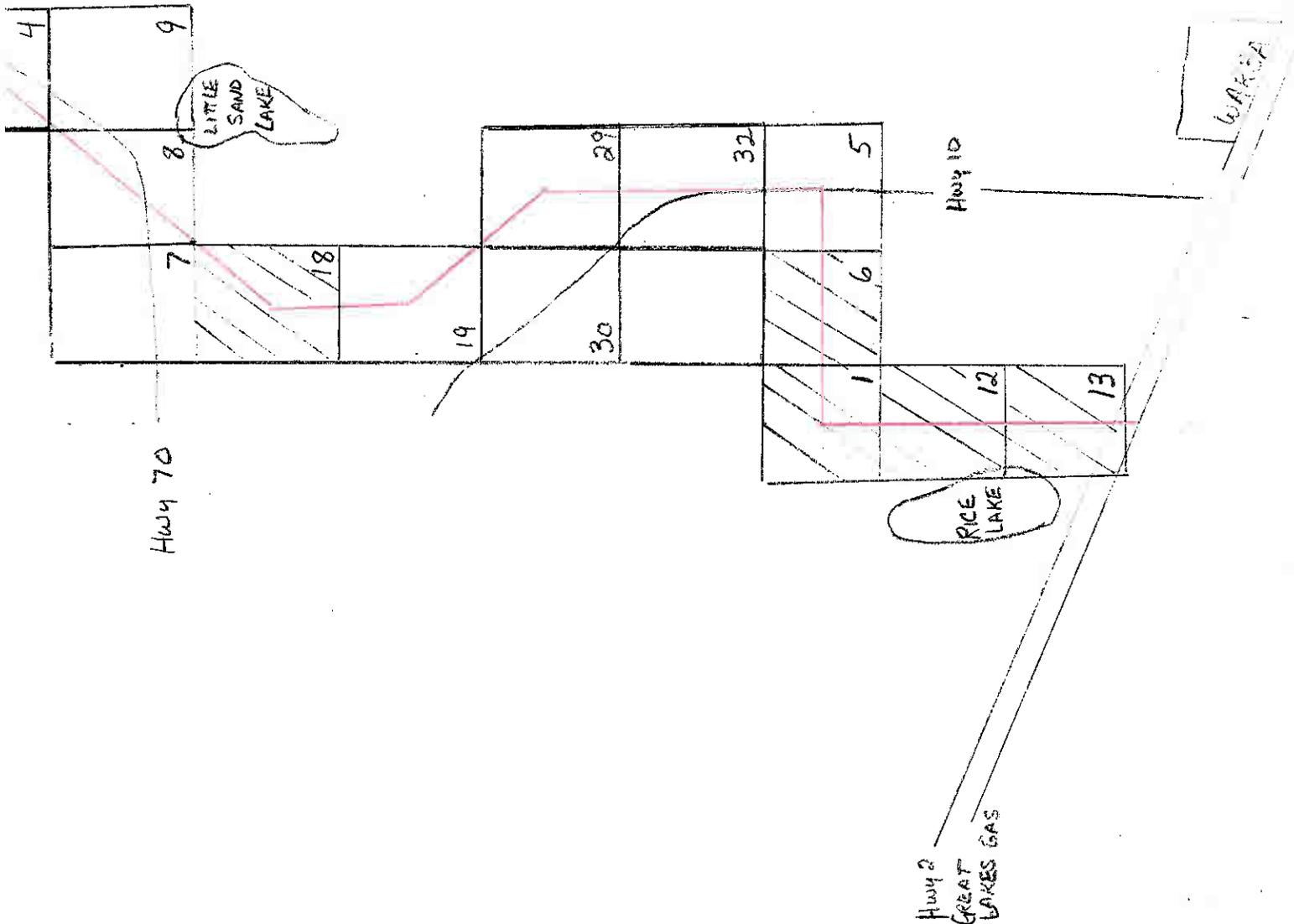
Sincerely.

*Michael Karna*

Michael Karna  
21205 Bluebird Drive  
Grand Rapids, MN 55744  
Phone 218-326-6061







NASHUAUK (E) SECTION 32

LONE PINE TOWNSHIP SECTIONS 7, 6 & 5

GREENWAY TOWNSHIP SECTIONS 34, 26, 23, 14, 13 & 12

UNORGANIZED TOWNSHIP T55N-R23W SECTIONS 32, 29, 30, 19, 7, 8, 9 & 4

FEELEY TOWNSHIP SECTIONS 6 & 5

BLACKBERRY TOWNSHIP SECTIONS 13, 12 & 1

PROPOSED ROUTE FOLLOWS HWY 2 FROM CENTER OF SECTION 1 TO THE EAST THEN NORTHERLY TO APPROX. SECTION 32

ITASCA COUNTY TAX DISTRICT



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September 20, 2007

Ms. Kathleen M. Brennan, Attorney  
McGrann Shea  
800 Nicollet Mall  
Suite 2600  
Minneapolis, Minnesota 55402-7035

RE: Information Request #3  
PUC Docket No. PL E280/GP-06-1481

Dear Ms. Brennan,

I have received a proposed route modification from Mr. Karna; he is asking if the preferred route, as it crosses parcel 08-010-3200 and 08-010-2304, could be modified to accommodate future development. I am requesting that the applicant respond to this proposed modification; please include in your discussion of this proposed modification the following:

- Discuss how the request for a 1500' corridor/route in the application allows for flexibility to accommodate specific landowner concerns;
- Verify whether this change lie within the proposed 1500' pipeline route corridor;
- Provide an aerial photograph illustration (small scale) of the area, showing both the original preferred route and the proposed modification;
- Discuss the implications of moving the tap on the Great Lakes Gas line to accommodate this proposed modification.

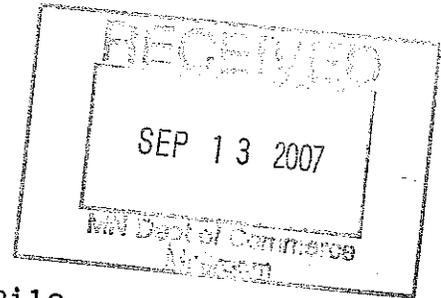
The 70 day comment period for the consideration of alternative routes ends on October 15, 2007; in an effort to maintain the proposed schedule, the Department is asking that you submit your response by that date. If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,

William Cole Storm, DOC-EFP

September 10, 2007

Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198



Attn: Sharon Ferguson/ Bill Storm/ Deborah Pile

Re; PUC Docket No.PL E280/GP-06-1481

ROUTE MODIFICATION PROPOSAL

I do not agree that the SEH preferred route is best corridor but in the event that is chosen by the PUC-I am asking for a slight modification. I own parcel 08-010-3200. where the tie-in for the Nashwauk to Great Lakes Gas will occur in Blackberry Township. Recently I have sold on Contract for Deed 16 acres of the original 35 acres and 6 acres of the original 20 acres in parcel 08-010-2304 to Kathy Shuster. Kathy, her daughter and two sons plan on building homes on the two parcels that would be cut diagonally by the SEH preferred route. I ask that the route be changed to run straight North 200 feet from the East property line of parcel 08-010-3200 from the tie-in to Hwy 2. This will put the pipeline crossing Hwy 2 at the same point as the preferred route but will greatly reduce the impact on the developmental plans of Kathy Shuster and her family. I have proposed this change to Clarence Kdrmas and he verbally approved. I also proposed a possible road to be built to access the tie-in from the Happy Hollow Road which Clarence also agreed to. I have not seen any modification to the preferred route on maps generated by SEH since that first meeting in Taconite.

I am asking for a documented route change and also locked gates across the Happy Hollow access and Hwy 2 access to the Nashwauk pipeline to which only Nashwauk Public Utilities, Great Lakes Gas, and I would have keys. This documentation is needed ASAP so that Kathy and her family can proceed with placement of their homes.

Your assistance in this matter will be greatly appreciated and I will pass the documentation on to Kathy Shuster as soon as I get it. I made a verbal condition of sale of this property that I either get the route changed entirely or at least get it modified so the Shusters can use the property they are buying not just watch the pipeline carve it up. I have sent a Route Change Proposal separately so that it could be evaluated independently from the modification proposal.

Sincerely,  
*Michael Karna*  
Michael Karna  
21205 Bluebird Drive  
Grand Rapids, MN 55744  
Phone 326-6061

HAPPY HOLLOW ROAD

08-410-0120

08-010-2304

08-010-3200

08-010-3100

HWY 2

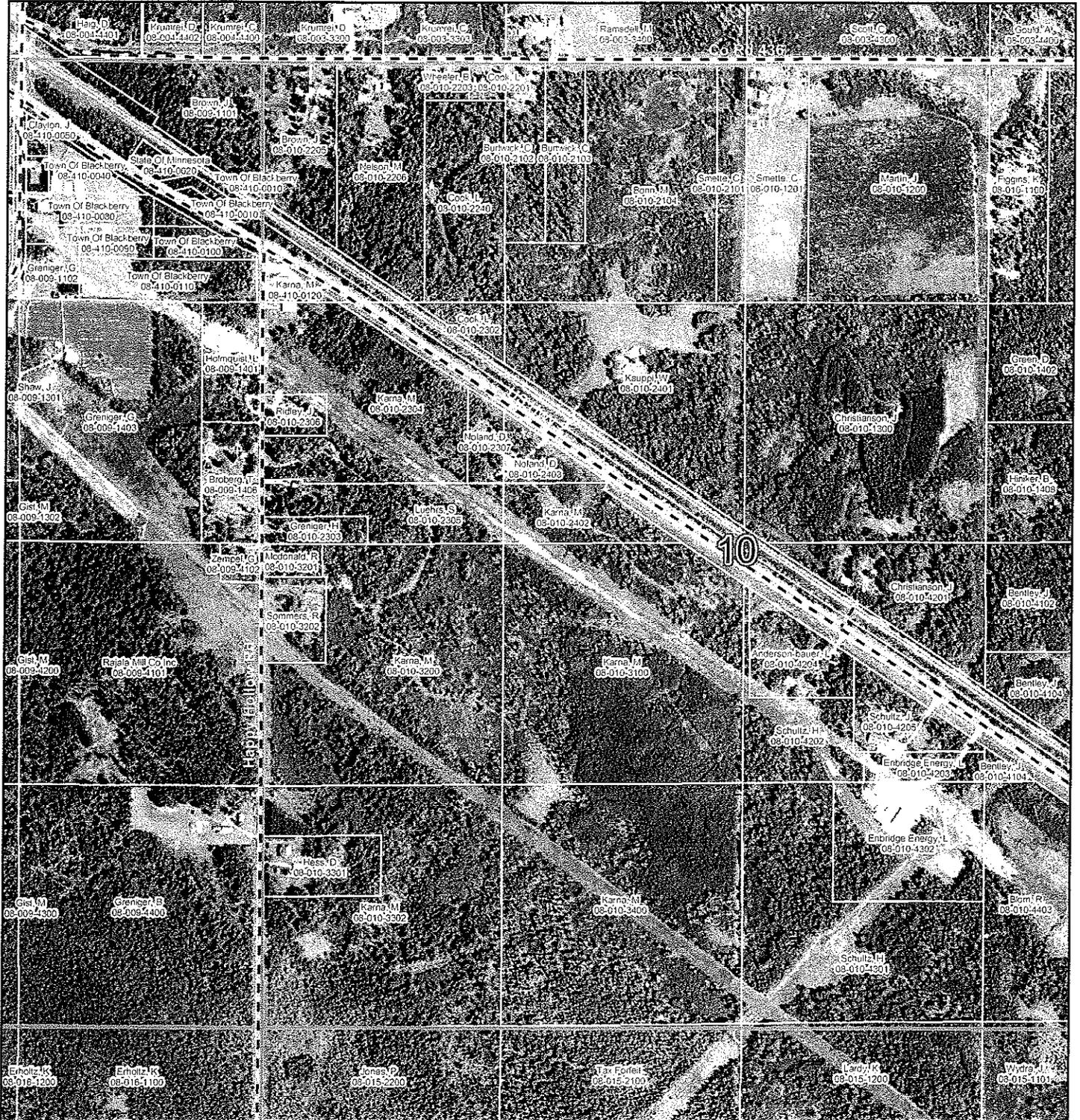
ENBRIDGE

GREAT LAKES GAS

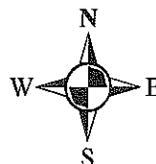
- — — — — PREFERRED ROUTE
- — — — — MODIFIED ROUTE
- — — — — KATHY SHUSTER PROPERTY

# Blackberry

## T54 - R24



Map Created by Larry Daigle



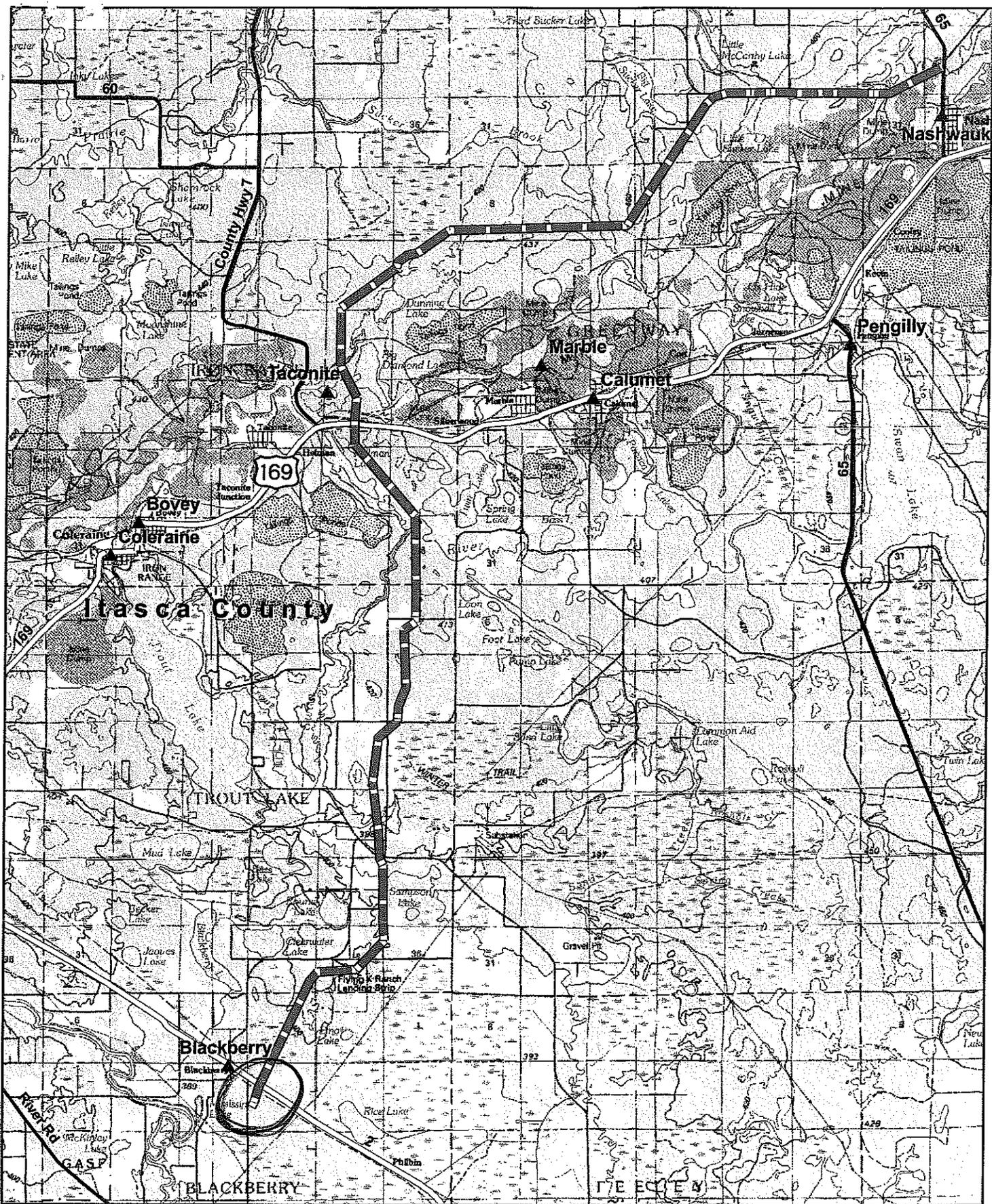
Itasca Geographic Information System  
"decision support through automation"

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ALL RIGHTS RESERVED**

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This information is a compilation of data from different sources with varying degrees of accuracy and requires a qualified field survey to verify.

Map Document: (S:\KOWIN\shu070100\GIS\PU\PERMIT Figure 02 Project Vicinity Map 8-5x11 P.mxd)  
 2/22/2007 12:28:21 PM



|  |   |   |  |   |
|--|---|---|--|---|
|  <p>3535 VADNAIS CENTER DR.<br/>         ST. PAUL, MN 55110<br/>         PHONE: (651) 450-2000<br/>         FAX: (651) 490-2150<br/>         WATTS: 800-325-2055<br/>         www.sehinc.com</p> | <p><b>City of Nashwauk<br/>         Public Utilities<br/>         Commission</b></p> <p>February 2007</p> | <p><b>Legend</b></p> <ul style="list-style-type: none"> <li>▲ Cities</li> <li>▬ Nashwak-Blackberry Pipeline</li> <li>□ Counties</li> <li>== U.S. Highways</li> <li>— Other Highways</li> </ul> <p>Source: ESRI, USGS, Itasca County, and SEH.<br/>         © 2007 SEH</p> | <p><b>Figure 2</b></p> <p><b>Project Vicinity<br/>         Map</b></p> |  <p>Itasca County - South<br/>         Coordinate System</p> <p>0 10,000<br/>         Feet</p> |
|--|---|---|--|---|



## Energy Facility Permitting

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September 24, 2007

Ms. Kathleen M. Brennan, Attorney  
McGrann Shea  
800 Nicollet Mall  
Suite 2600  
Minneapolis, Minnesota 55402-7035

RE: Information Request #4  
PUC Docket No. PL E280/GP-06-1481

Dear Ms. Brennan,

I have received another comment letter from Mr. Karna; among other comments he is contesting the house count data. The house count data will be an integral component of the Environmental Comparative Analysis on any routes that the PUC determines should be carried forward. I am requesting that the applicant address those concerns relative to the house count in a written response.

Please include in your discussion of the house count data the following:

- Discuss the relationship between the data (i.e., location of residential homes) illustrated on Figure D-22 (in red) and Figures 11-1 through 11-7 (in orange), the requested corridor width of 1,500 feet and the house count (i.e., residences within 300 feet of the center line of the proposed pipeline);
- Provide tables and figures along with your text to aid in the clarification of the data.

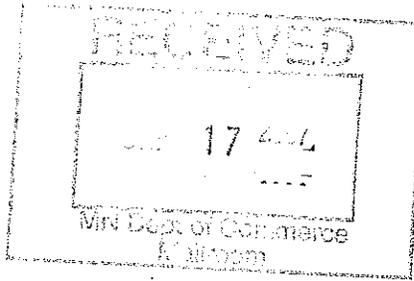
The 70 day comment period for the consideration of alternative routes ends on October 15, 2007; in an effort to maintain the proposed schedule, the Department is asking that you submit your response by that date. If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,

William Cole Storm, DOC-EFP

September 11, 2007

Department of Commerce  
85 7th Place East, Suite 500  
St. Paul, MN 55101-2198



Attn: Sharon Ferguson/ Bill Storm/ Deborah Pile

Re: PUC Docket No.PL E280/GP-06-1481

MN Rules Part 4415.0100 Criteria For Pipeline Route Selection Subp. 3 Criteria Section A states: human settlement, existence and density of population areas, existing and planned future land use and management plans will be considered in route planning. I strongly ask the PUC to reject the SEH preferred route through my property for all the above reasons.

I own parcel 08-010-3200 in Blackberry Township where the tie-in to Great Lakes Gas would occur and cut this 35 acres diagonally. This would make it necessary to build a road across the pipeline to access all 35 acres and severely hamper human settlement. The pipeline would cut across parcel 08-010-2304 that I also own and in conjunction with parcel 08-410-0120 am trying to develop into commercial property. Presently in parcel 08-410-0120 there is a 43ft. x 72ft. Morton building and a \$15,000 mound septic system, electricity and a well. This parcel consists of just .96 acres so therefore will have to be sold with part of parcel 08-010-2304 to make it viable. There are already four pipelines soon to be six lines, owned by Enbridge, that cut through parcel 08-010-2304. If a 24" gas line is allowed to pass through this property it will make it practically worthless! I have been advertising the property for sale at \$285,000 and have started negotiations with three different customers. Negotiations have halted when I mention the possibility of the gas line. I am not a big-time speculator, I inherited the property and this is my retirement program! Blackberry Township is struggling like all Minnesota communities and would welcome the tax dollars generated by commercial or industrial development on my property.

The water table could easily become contaminated in the area and subsequent tunnel at the intersection of the Nashwauk pipeline and Enbridge pipelines. Enbridge lines are covered with 42"-48" of sugar sand. The largest Enbridge line is 36" and if you add 48"+36"=84" (gas line trench depth) this equals 168" (14 feet). The well in my Morton building is 15 feet deep and Dan Noland, who lives to the East of this intersection, has a shallow well approximately 290 feet from the intersection. There are several families close enough to have contaminated wells. The hazardous potential of this intersection has also been overlooked and is as

dangerous as it sounds. The result of a 24" gas line exploding beneath six crude oil lines would be catastrophic and this can be avoided by not allowing the preferred route to be approved!

The intersection should not be allowed within 1/2 mile of human habitation.

SEH Map Itasca County/MSI Alternative 05-ICMSI-3 (D-22) in their permit application SEH No. A-NASHU0701.00 has five red dots along the entire route (preferred route). This represents only five homes within 300 feet of the pipeline. Maps Figure 11-1 through 11-7 in SEH Partial Exemption Booklet has 32 orange dots within the corridor and a much larger number along the periphery. What happened to the 27+ homes? This is either a gross error or a deliberate misrepresentation of the facts! I would like to see the Citizens Committee or some other agency honestly evaluate the true number of households within 300 feet of this proposed route. Possibly Lake Country Power has maps with their customers that could be overlaid with this preferred route. I tracked the preferred route through Blackberry and Trout Lake Townships with the aid of the Itasca County Plat Book and recognized three names and called them to see if the pipeline would pass within 300 feet of their homes and all three said it would. There is no red dot on the latest SEH drawing at their locations! Their names are: Mitchell Bonham, 24315 County Road 10, Bovey, MN 55709-phone 218-245-1537/ Dale Sutherland, 23171 Hardwood Road, Bovey, MN 55709 phone 218-245-3604 and John Benson, 24305 County Road 10, Bovey, MN 55709, phone 218-245-2349. All three are not in favor of the route through their property but were unable to attend the meetings due to time conflict with their employment. Perhaps letters should be sent out to all persons that own property through which the pipeline would pass to give them the opportunity to respond without having to attend meetings that they are unable to attend. This is a Democracy so be democratic and let the people directly involved voice their opinions.

The reason the Partial Exemption was changed to the longer permitting process is the "preferred route"-citizens did not want this route then and still do not want it now. SEH has generated a booklet three times thicker than the original document that has "stacked the deck" to try again to push their route through the Department of Commerce and the PUC-please do not allow this to happen!

Thank you for time invested to read my comments and assistance in finding the most equitable route for this pipeline we need so the plant in Nashwauk can be built and the employment we so desperately need can happen.

Sincerely,  
*Michael Karna*  
Michael Karna  
21205 Bluebird Drive  
Grand Rapids, MN 55744  
Phone 218-326-6061



## Energy Facility Permitting

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<http://energyfacilities.puc.state.mn.us>

October 2, 2007

Ms. Kathleen M. Brennan, Attorney  
McGrann Shea  
800 Nicollet Mall  
Suite 2600  
Minneapolis, Minnesota 55402-7035

RE: Information Request #5  
PUC Docket No. PL E280/GP-06-1481

Dear Ms. Brennan,

Given the concerns about safety raised within the CAC and from the general public, I am requesting that the applicant provide a written essay to address several issues and concepts relative to pipeline safety of the proposed Blackberry to Nashwauk pipeline.

Please include in your discussion the following concepts and how they relate to the construction, operation and maintenance of the proposed pipeline:

- Pipeline Integrity Management;
- High Consequence Areas;
- Potential Impact Radius;
- Area Classification.

The 70 day comment period for the consideration of alternative routes ends on October 15, 2007; in an effort to maintain the proposed schedule, the Department is asking that you submit your response by that date. If you have any comments or concerns, please do not hesitate to contact me.

Sincerely,

William Cole Storm, DOC-EFP