

From: SHARON NATZEL [mailto:sorgww@ah.com]
Sent: Wednesday, March 12, 2014 11:36 PM
To: Hartman, Larry (COMM)
Subject: PUC Docket No. PL9/PPL-13-474

Dear Mr. Hartman, Environmental Review Manager - EERA,

I have attached my document containing my comments/questions for entry into the online system now for PUC Docket No. PL9/PPL-13-474 Route Permit.

Due to time constraints at the Public Information Meeting today in Park Rapids, you asked that attendees limit the amount of time required to present. I complied and went through just 5 of my 17 comments / questions orally. You and I discussed that I could send the full set of comments/questions to you at the PUC so it will be available through the Docket No. PL9/PPL-13-474.

I learned much at the Public Information Meeting today. Thank you.

Sharon Natzel
13623 County 20
Park Rapids, MN 56470

Sharon M. Natzel
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Park Rapids, MN 56470

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Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Reference: Public Utilities Commission (PUC) Docket Number: PL6668/PPL-13-474

Dear Mr. Hartman,

In reviewing the materials online that are available for Docket 13-474 Route Permit, I've noted my comments and questions below. Thank you for your attention to these opportunities.

Sincerely,

Sharon M. Natzel

- 1) I noticed in review of the Sandpiper Pipeline documentation in Docket 13-474 that on the newspaper list / table, the Northwoods Press was not asterisked appropriately as the official Hubbard County newspaper. The asterisk was on the other local paper. There was also a difference in what route information was indicated to be published between these two in the newspaper list. The Northwoods Press had only route and the other local paper had two routes listed in the table for our Hubbard County area.

I am very concerned that we in Hubbard County and the general public were not notified properly if the official Hubbard County newspaper did not contain all the route notification information. Because of this inaccuracy, I am concerned how much important public information and notification concerning both the pipeline certificate of need and the route permit hasn't been communicated properly to us here in Hubbard County? I believe that a time extension of at least August 1, 2014 and additional public meetings should be held in Hubbard County to allow for full review of both. All the extended public meetings and hearings should be in the official newspaper of Hubbard County – the Northwoods Press. Plus continue with the other local paper too since the general public will now expect to be informed that way as in the past on this project.

- 2) Based on the MPUC Route Permit Supplement under General Information 7852.2100, General Information, Subpart 3. Statement of ownership. North Dakota Pipeline Company, LLC (NDPC) is a Delaware Limited Liability Company. It further states that NDPC is now a joint venture between Enbridge Energy Partners, L.P. and Marathon Petroleum Corporation. Enbridge Energy Partners, L.P. is a Delaware master limited partnership. It further states that NDPC will be the owner of the proposed 24-inch and 30-inch crude oil pipeline.

When there are spill(s) or leaks from the Sandpiper Pipeline, who specifically is/are the owner(s) and responsible company(s) that will provide the funding for cleanup of the water and the environment? What are the current assets that will be utilized by these company(s) and who are

the current officers of the company(s)? Is there a fund that the owner(s) and responsible company(s) will maintain to provide the assets necessary in a spill or leak?

- 3) In Docket 13-474, there is one valve listed for Hubbard County at Milepost 445.1. This valve is listed on Table 1.2.4-1 Proposed Aboveground Facilities Associated with the Sandpiper Pipeline Project. For this table, there is a note "a" that says: Facility locations are preliminary and subject to change based on engineering design. Note "b" says Mileposts are used for reference and may not reflect exact location. The valve prior to the Hubbard County valve was milepost 403.6 in Clearwater County. That means there would be 41.5 miles between valves in this situation. The next valve immediately after the Hubbard County valve is at Milepost 479.4 in Cass County so that would be 34.3 miles between the two valves. The document indicates the Aboveground Facility at 479.4 in Cass County will be Tool Launch and Receiver Traps. For these 3 counties, there are 75 waterbodies crossed, not including wetlands, based on the Table 9.2.1 Summary of Waterbodies Crossed by the Sandpiper Pipeline Project. The small number of valves is a concern in case of a leak / spill where an emergency shutoff is required to prevent pollution of water and other natural resources.
- 4) The southern preferred route introduces risk to many more acres of Minnesota's waters and other resources that currently do not have pipeline risks associated with them. Water is one of Minnesota's greatest resources. Minnesota is known as "the land of 10,000 lakes". Park Rapids is known as the "nation's vacation land" since the 1950's. The economy of Hubbard County in large part hinges on tourism based on the water-related properties in the area. There is great potential to put at risk many valuable Minnesota resources with the Sandpiper pipeline and any follow-on projects to the right-of-way that stays in place for the life of the pipeline. I feel that a full EIS environmental impact statement is necessary to do due-diligence and protect our Minnesota waters adequately.

For example, in Hubbard Township, which is the 4th most valuable (tax base wise) in Hubbard County, from 2013 figures it has a taxable market value (TMV) of water-related properties of about \$166M. This is 70% of the TMV of all property in the township. These properties provide almost 71% of the tax revenue. Long Lake is the most valuable lake in the county. There are 500 unique owner addresses for all the parcels on the lake. I am concerned regarding the risks to Long Lake with the potential of a Hubbard pumping station shown in the 14-473 Certificate of Need. Long Lake is spring fed. Long Lake is also in the Straight River Groundwater Management Area which is crossed by the pipeline. Any leaks / spills there could negatively affect Long Lake potentially. On Duck Lake in Hubbard Township where the pipeline comes very near the edge of the lake there are another 120 homes. A spill / leak would devastate this lake. The summer seasonal population in Hubbard Township goes up much higher than in the winter. This is also true across Hubbard County. The agricultural lands crossed by the pipeline are part of the other 30% of the TMV in Hubbard Township. Any spill / leak would impact the growing capacity of the agricultural land.

- 5) For the southern preferred route, NDPC provides only general information on how the waterbody crossings will be determined.. There are 144 waterbodies crossed based on table 9.2-1. 7% of the waterbody field surveys are still to be surveyed in 2014. There are an additional 874 wetlands based on table 9.3.1-1. Four types of crossing methods typically utilized are outlined in the NDPC documentation for these waterbodies.

Of concern is that for each waterbody crossing will there be standard questions answered on *who* is to be involved with decision making for that specific waterbody crossing, *what* are the facts / risks on that specific crossing, *where* specifically is the best place to cross, *when* on the project timeline to cross and *how* to specifically execute the engineered crossing, plus pictures to

document before, during and after the crossing to refer to in case of a spill / leak in future, documentation on actual method used for each waterbody, testing, etc.

What type of pipe material will be utilized for the waterbodies to prevent spills / leaks? Some of the waterbodies may be hard on the metal; for example acid bogs exist that could be more corrosive. Is there additional safety features considered in the pipeline where waterbodies and wetlands are crossed? I feel that a full EIS environmental impact statement is necessary to do due-diligence and protect our Minnesota waters adequately.

Another concern related to our waterbody crossings is the concern of will our MNDNR and other regulatory agencies have the adequate staffing for the Sandpiper project to protect and ensure the safety of our Minnesota waters? Below are the number of entries in the project information related to the MNDNR and other regulatory agencies that I noticed. This may not be the entire list of MNDNR interfaces with the project...

- In 9.2 Waterbody Crossings, it states NDPC will determine the appropriate crossing method for each waterbody upon further consultation with appropriate regulatory agencies and further engineering review.
- In the section on rivers, the NDPC project states that river crossings will be coordinated with the MNDNR.
- In the section on state canoe / boating routes, it states – The MNDNR manages canoe / boating routes in the state and NDPC has initiated consultations with the MNDNR regarding appropriate crossing plans as a part of the License to Cross Public Waters permitting process.
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- 6) For the 874 wetland project crossings, how do you determine if a wetland needs to be filled or drained? Does NDPC do replacement wetlands for those that need to be filled and drained? Does NDPC work within the guidelines of the Wetland Conservation Act and with the Board of Water & Soil and local SWCD's regarding the 874 wetlands.

What regulatory agencies have oversight responsibility for the decisions on wetlands below that NDPC will be working with to ensure Minnesota waters are protected? What type of documentation does NDPC require for each wetland project crossing? What are the qualifications of an EI? Is the EI an employee of NDPC? What separation of duty is there to ensure the proper decisions are made to assure the best long-term decision is made for our Minnesota waters?

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 - It goes on to state later..... At this time, NDPC does not anticipate that wetlands will be permanently filled or drained as a result of the Project. This statement makes it seem as though there is that possibility of filling a wetland.... How is it determined and what oversight is there?
- 7) In the 9.1 Major Basins and Watersheds section, there is a diagram based on the USGS, 2013, showing the surface waters crossed by the preferred route are located in 4 Major Basins. These major watershed waters feed both Canada and the U.S. The square mile surface drainage area within the United States is 76,291 square miles. Of concern would be any leak or spill that affects one or more major basins. A spill / leak or sabotage could cause a national security risk to our water supplies here in the United States depending on the amount or locations. I feel that a full EIS is necessary to protect our United States water resources. In the Upper Mississippi River Source Water Protection Project information on their website, a 1980's study is cited where 18 million people use the Mississippi River Watershed for drinking water.
- 8) The southern preferred route impacts groundwater resources that are the primary source of water for private, public, commercial and industrial uses along the preferred route. As noted in 8.0 Groundwater resources section of NDPC project.... This route contains glacial drift aquifers which tend to be more heavily used for water production in the Project area due to their greater accessibility and the occurrence of permeable aquifer sediments.

My concern is that contamination of the groundwater during construction and after the Sandpiper pipeline is installed through leaks / spills. This area is known as the Central Sands area and is the primary area that agricultural product is produced. Irrigation is utilized to produce crops. A spill / leak would affect the growing capabilities. The surficial water has nitrates in it in some areas already so a spill / leak would add extra damage in these areas. If the buried aquifer becomes contaminated with a spill / leak this would cause harm to the local drinking water supply.

- 9) The Mississippi River is crossed twice by the project. The Mississippi River provides drinking water to St. Cloud, Minneapolis, six suburbs and the International airport per the minneapolismn.gov website. This is about a half million people a day that drink Minneapolis water per the website alone.

According to the Upper Mississippi River Source Water Protection Project information website, the US Environmental Protection Agency says that more than 50 communities rely on the Mississippi for their daily drinking water.

If the Mississippi River becomes contaminated with a leak / spill / sabotage this becomes a Department of Health issue, a National Security Issue, a Minnesota Pollution Control Agency issue and many community water supplies would be compromised. This is another reason I ask that a full EIS be completed and the many Federal and various State agencies in Minnesota and along the Mississippi flowage be consulted and the project fully reviewed.

- 10) In January 2014, the MN DNR Straight River Groundwater Management Area started. This area encompasses northeast Becker County and southwest Hubbard County and includes the city of Park Rapids and also part of the NDPC project area on the southern preferred route. This is a Trout Stream. Already the Trout Stream shifted from Brook Trout to Brown Trout due to warming. The management goal for the MN DNR is to ensure that use of groundwater is sustainable and does not harm ecosystems, water quality, or the ability of future generations to meet their needs. The NDPC Environmental Information Report indicates that the Straight River will be crossed at milepost 436.3. The Straight River is also an impaired waterway for dissolved oxygen. During the MinnCan pipeline crossing installation, there were 2 frack-outs on the Straight River. The concern here is the project impact on the DO, the temperature, and also groundwater during construction, more frack-outs and if there are leaks / spills during the ongoing Sandpiper pipeline operation.
- 11) Due to the water appropriation during pipeline testing, care will need to be taken to prevent spreading Eurasian Watermilfoil from the Crow Wing River to other waterways. This applies to pipeline construction equipment also that will be used in the Crow Wing River area that will need to be decontaminated or dried for several days before being used in other areas to prevent the spread of this aquatic invasive species.

During pipeline testing, are there limits to the water amounts and time of year that water appropriations done for each waterbody? Who regulates the water appropriation? What rights regarding water appropriation does the NDPC receive with the Sandpiper pipeline specifically? Are there water appropriation rights that are related to the right-of-way that NDPC will gain through the Sandpiper project? Is there an expiration date or time limit on the water appropriation rights and limits for NDPC? What state / federal agencies have oversight of the water appropriation rights of NDPC?

I am concerned that long term when the Bakken oil is depleted, the pipeline / right-of-way will then be used for transporting and/or appropriating our Minnesota fresh waters out of Minnesota. Based on the World Health Organization and UNICEF Joint Report "Progress on Drinking Water, 2012", there are still 783 billion people (11% of world population) without access to safe drinking water. Limited water resources across the world make our Minnesota fresh water attractive to others. I am very concerned that Minnesota may not have the right laws in place to keep our waters from being appropriated for others use. We need to protect our fresh waters adequately for our residents in Minnesota. Fresh Water is limited and may be the next "oil" to run in the pipeline corridor. I would ask that our Minnesota State Governor, the Senate and the House, plus the MNDNR, MPCA, and other state and federal agencies that have oversight for laws related to waters and water rights to review what Minnesota presently has in place to protect the waters from appropriation by other MN citizens, another state, another country or any corporation and if enhancements are required. The United Nations General Assembly has recognized drinking water and sanitation as human rights. As Minnesotans, we don't want to lose any of our current water rights or miss opportunities to adjust and enhance our water rights through appropriate laws and protection given the future possibility of being a fresh water spigot for the world. Water shortages create conflict. Someone or something may be coveting our fresh water.

- 12) The project doesn't speak to end of project life of the Sandpiper pipeline. How will the waters and environment be protected at that time? Of concern is if there are any requirements by regulatory agencies for taking up the pipeline after its useful life is complete with NDPC or does it just stay in

the ground to become a contamination issue through deterioration. Who has ownership / pays for the removal of the Sandpiper pipeline? Who has oversight of the end of project life?

- 13) The project doesn't speak to monitoring for acts of sabotage. What monitors will be utilized to protect the pipeline and in turn our waters and agricultural land from spills / leaks? For example, on the Trans-Alaska Pipeline, it seems that there may be more frequent checks than 26 times per year especially at key points along the structure (based on information received in a tour in Alaska 2013). Does the above-ground pipeline implementation method allow for enhanced monitoring through cameras and other sensors on the inside and outside. Has this method of pipeline installation been evaluated and compared to the buried Sandpiper Pipeline proposed pipe for environmental risk comparison and also a risk comparison for the 4 methods of installation techniques named in the project documentation? Are there other methods of pipeline implementation that are available to consider too? What are the safety features of each?

- 14) The southern preferred route will use a right-of-way that a competitor-operated pipeline also uses. This could potentially be problematic. The Minnesota Pipe Line Company, LLC pipelines are operated by Koch Pipeline company, L.P., a wholly owned, indirect subsidiary of Koch Industries, Inc. according to the official website of Minnesota Pipe Line Company. Of concern is just how the right-of-way management occurs during project installation, ongoing testing and any repairs when the right-of-way also contains multiple competitor-managed pipelines with two different product types (natural gas and oil). There could be higher risk and more complications especially with the two different competitor-managed product pipelines with the cumulative effects of pipeline constructions for Sandpiper. It isn't evident that any of the northern route pipelines are currently owned by competitors of the Sandpiper pipeline based on the project documentation reviewed.

- 15) NDPC states in I. cumulative potential effects of related or anticipated future pipeline construction; At this time, NDPC has no firm plans for future pipeline construction that would result in cumulative potential effects on environmental resources. ³ However, NDPC has routed the Project to facilitate construction of future projects as co-located facilities along the Sandpiper right-of-way. In the event that another project is approved and would follow the Sandpiper right-of-way, environmental impacts of subsequent construction would be reduced by utilizing the work space created for Sandpiper to the extent practicable.
 - Of concern is the potential addition of pipelines to the preferred southern route over time. It appears that NDPC is counting the right-of-way and subsequent construction reduction as a "plus" to justify the preferred southern route. However, for the northern route, NDPC does not perceive it as a benefit to utilize the northern route for Sandpiper. There are existing pipelines in the right-of-way on the northern route as we know. The "construction reduction" factor should enable to continued consideration and selection of the northern route for Sandpiper and eliminate the need for the preferred southern route.
 - What is the risk if the Sandpiper pipeline crude oil is replaced by tar-sands oil to our environment and waters? Is the tar-sands oil more corrosive to pipelines? What other type of equipment like valves / pumping stations, etc. would we need to expect if the Sandpiper pipeline product switches from a Bakken crude oil to another oil product such as Canadian tar-sands oil? What are the risks to the Sandpiper pipeline if another pipe is in the same right-of-way that carries tar-sands oil?

- 16) When the Sandpiper Pipeline is operational, the existing Line 81 products will be transported then too instead of moving on the Enbridge Mainline System. Does this Line 81 product or other products that could be switched to the Sandpiper Pipeline cause even greater risk for safety and environmental impact to Minnesota and Hubbard County waters?

- 17) A Pumping station in Hubbard County in Hubbard Township just south of the town of Hubbard which is also at the south end of Long Lake was mentioned in 13-473 Certificate of Need. The "Hubbard" Pumping station was in the project overview map in 13-473, attachment 1a. The Hubbard pumping station doesn't appear to be mentioned in the 13-474 documentation. It could be a concern depending on the risks associated with a pumping station, which aren't available.

RECEIVED

MAR 31 2014

MAILROOM

Monday, March 24, 2014

Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Dear Mr. Hartman,

I am now sending this submission via certified USPS mail so that I am certain that you have received it.
The emailed version from 3/12/2014 has not appeared on the 13-474 docket.

Sincerely,



Sharon Natzel

13623 County 20

Park Rapids, MN 56470

From: SHARON NATZEL <sorgwweh@aol.com>

To: larry.hartman <larry.hartman@state.mn.us>

Subject: PUC Docket No. PL9/PPL-13-474

Date: Wed, Mar 12, 2014 11:35 pm

Attachments: SMN_PUC_Docket_No_PL6668__PPL-13-474_QA.pdf (164K)

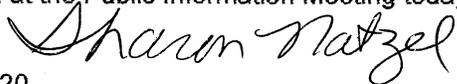
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 - It goes on to state later..... At this time, NDPC does not anticipate that wetlands will be permanently filled or drained as a result of the Project. This statement makes it seem as though there is that possibility of filling a wetland.... How is it determined and what oversight is there?
- 7) In the 9.1 Major Basins and Watersheds section, there is a diagram based on the USGS, 2013, showing the surface waters crossed by the preferred route are located in 4 Major Basins. These major watershed waters feed both Canada and the U.S. The square mile surface drainage area within the United States is 76,291 square miles. Of concern would be any leak or spill that affects one or more major basins. A spill / leak or sabotage could cause a national security risk to our water supplies here in the United States depending on the amount or locations. I feel that a full EIS is necessary to protect our United States water resources. In the Upper Mississippi River Source Water Protection Project information on their website, a 1980's study is cited where 18 million people use the Mississippi River Watershed for drinking water.
- 8) The southern preferred route impacts groundwater resources that are the primary source of water for private, public, commercial and industrial uses along the preferred route. As noted in 8.0 Groundwater resources section of NDPC project.... This route contains glacial drift aquifers which tend to be more heavily used for water production in the Project area due to their greater accessibility and the occurrence of permeable aquifer sediments.

My concern is that contamination of the groundwater during construction and after the Sandpiper pipeline is installed through leaks / spills. This area is known as the Central Sands area and is the primary area that agricultural product is produced. Irrigation is utilized to produce crops. A spill / leak would affect the growing capabilities. The surficial water has nitrates in it in some areas already so a spill / leak would add extra damage in these areas. If the buried aquifer becomes contaminated with a spill / leak this would cause harm to the local drinking water supply.

- 9) The Mississippi River is crossed twice by the project. The Mississippi River provides drinking water to St. Cloud, Minneapolis, six suburbs and the International airport per the minneapolismn.gov website. This is about a half million people a day that drink Minneapolis water per the website alone.

According to the Upper Mississippi River Source Water Protection Project information website, the US Environmental Protection Agency says that more than 50 communities rely on the Mississippi for their daily drinking water.

If the Mississippi River becomes contaminated with a leak / spill / sabotage this becomes a Department of Health issue, a National Security issue, a Minnesota Pollution Control Agency issue and many community water supplies would be compromised. This is another reason I ask that a full EIS be completed and the many Federal and various State agencies in Minnesota and along the Mississippi flowage be consulted and the project fully reviewed.

- 10) In January 2014, the MN DNR Straight River Groundwater Management Area started. This area encompasses northeast Becker County and southwest Hubbard County and includes the city of Park Rapids and also part of the NDPC project area on the southern preferred route. This is a Trout Stream. Already the Trout Stream shifted from Brook Trout to Brown Trout due to warming. The management goal for the MN DNR is to ensure that use of groundwater is sustainable and does not harm ecosystems, water quality, or the ability of future generations to meet their needs. The NDPC Environmental Information Report indicates that the Straight River will be crossed at milepost 436.3. The Straight River is also an impaired waterway for dissolved oxygen. During the MinnCan pipeline crossing installation, there were 2 frack-outs on the Straight River. The concern here is the project impact on the DO, the temperature, and also groundwater during construction, more frack-outs and if there are leaks / spills during the ongoing Sandpiper pipeline operation.
- 11) Due to the water appropriation during pipeline testing, care will need to be taken to prevent spreading Eurasian Watermilfoil from the Crow Wing River to other waterways. This applies to pipeline construction equipment also that will be used in the Crow Wing River area that will need to be decontaminated or dried for several days before being used in other areas to prevent the spread of this aquatic invasive species.

During pipeline testing, are there limits to the water amounts and time of year that water appropriations done for each waterbody? Who regulates the water appropriation? What rights regarding water appropriation does the NDPC receive with the Sandpiper pipeline specifically? Are there water appropriation rights that are related to the right-of-way that NDPC will gain through the Sandpiper project? Is there an expiration date or time limit on the water appropriation rights and limits for NDPC? What state / federal agencies have oversight of the water appropriation rights of NDPC?

I am concerned that long term when the Bakken oil is depleted, the pipeline / right-of-way will then be used for transporting and/or appropriating our Minnesota fresh waters out of Minnesota. Based on the World Health Organization and UNICEF Joint Report "Progress on Drinking Water, 2012", there are still 783 billion people (11% of world population) without access to safe drinking water. Limited water resources across the world make our Minnesota fresh water attractive to others. I am very concerned that Minnesota may not have the right laws in place to keep our waters from being appropriated for others use. We need to protect our fresh waters adequately for our residents in Minnesota. Fresh Water is limited and may be the next "oil" to run in the pipeline corridor. I would ask that our Minnesota State Governor, the Senate and the House, plus the MNDNR, MPCA, and other state and federal agencies that have oversight for laws related to waters and water rights to review what Minnesota presently has in place to protect the waters from appropriation by other MN citizens, another state, another country or any corporation and if enhancements are required. The United Nations General Assembly has recognized drinking water and sanitation as human rights. As Minnesotans, we don't want to lose any of our current water rights or miss opportunities to adjust and enhance our water rights through appropriate laws and protection given the future possibility of being a fresh water spigot for the world. Water shortages create conflict. Someone or something may be coveting our fresh water.

- 12) The project doesn't speak to end of project life of the Sandpiper pipeline. How will the waters and environment be protected at that time? Of concern is if there are any requirements by regulatory agencies for taking up the pipeline after its useful life is complete with NDPC or does it just stay in

the ground to become a contamination issue through deterioration. Who has ownership / pays for the removal of the Sandpiper pipeline? Who has oversight of the end of project life?

- 13) The project doesn't speak to monitoring for acts of sabotage. What monitors will be utilized to protect the pipeline and in turn our waters and agricultural land from spills / leaks? For example, on the Trans-Alaska Pipeline, it seems that there may be more frequent checks than 26 times per year especially at key points along the structure (based on information received in a tour in Alaska 2013). Does the above-ground pipeline implementation method allow for enhanced monitoring through cameras and other sensors on the inside and outside. Has this method of pipeline installation been evaluated and compared to the buried Sandpiper Pipeline proposed pipe for environmental risk comparison and also a risk comparison for the 4 methods of installation techniques named in the project documentation? Are there other methods of pipeline implementation that are available to consider too? What are the safety features of each?

- 14) The southern preferred route will use a right-of-way that a competitor-operated pipeline also uses. This could potentially be problematic. The Minnesota Pipe Line Company, LLC pipelines are operated by Koch Pipeline company, L.P., a wholly owned, indirect subsidiary of Koch Industries, Inc. according to the official website of Minnesota Pipe Line Company. Of concern is just how the right-of-way management occurs during project installation, ongoing testing and any repairs when the right-of-way also contains multiple competitor-managed pipelines with two different product types (natural gas and oil). There could be higher risk and more complications especially with the two different competitor-managed product pipelines with the cumulative effects of pipeline constructions for Sandpiper. It isn't evident that any of the northern route pipelines are currently owned by competitors of the Sandpiper pipeline based on the project documentation reviewed.

- 15) NDPC states in I. cumulative potential effects of related or anticipated future pipeline construction; At this time, NDPC has no firm plans for future pipeline construction that would result in cumulative potential effects on environmental resources. 3 However, NDPC has routed the Project to facilitate construction of future projects as co-located facilities along the Sandpiper right-of-way. In the event that another project is approved and would follow the Sandpiper right-of-way, environmental impacts of subsequent construction would be reduced by utilizing the work space created for Sandpiper to the extent practicable.
 - Of concern is the potential addition of pipelines to the preferred southern route over time. It appears that NDPC is counting the right-of-way and subsequent construction reduction as a "plus" to justify the preferred southern route. However, for the northern route, NDPC does not perceive it as a benefit to utilize the northern route for Sandpiper. There are existing pipelines in the right-of-way on the northern route as we know. The "construction reduction" factor should enable to continued consideration and selection of the northern route for Sandpiper and eliminate the need for the preferred southern route.
 - What is the risk if the Sandpiper pipeline crude oil is replaced by tar-sands oil to our environment and waters? Is the tar-sands oil more corrosive to pipelines? What other type of equipment like valves / pumping stations, etc. would we need to expect if the Sandpiper pipeline product switches from a Bakken crude oil to another oil product such as Canadian tar-sands oil? What are the risks to the Sandpiper pipeline if another pipe is in the same right-of-way that carries tar-sands oil?

- 16) When the Sandpiper Pipeline is operational, the existing Line 81 products will be transported then too instead of moving on the Enbridge Mainline System. Does this Line 81 product or other products that could be switched to the Sandpiper Pipeline cause even greater risk for safety and environmental impact to Minnesota and Hubbard County waters?
- 17) A Pumping station in Hubbard County in Hubbard Township just south of the town of Hubbard which is also at the south end of Long Lake was mentioned in 13-473 Certificate of Need. The "Hubbard" Pumping station was in the project overview map in 13-473, attachment 1a. The Hubbard pumping station doesn't appear to be mentioned in the 13-474 documentation. It could be a concern depending on the risks associated with a pumping station, which aren't available.

Sharon Natzel
13623 County 20
Park Rapids, MN 56470

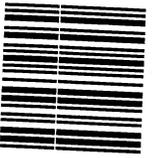
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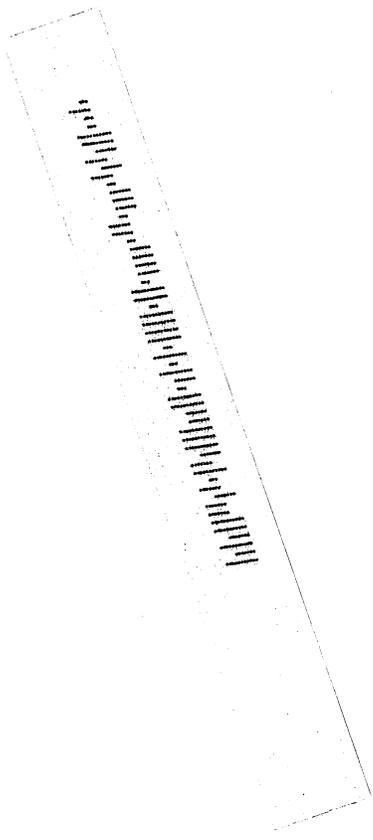


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Mr. Larry Hartman, Environmental Review Manag
Energy Environmental Review and Analysis (EERA)
Minnesota Dept. of Commerce
85 7TH Place East, Suite 500
St. Paul, MN 55101

From: [Hartman, Larry \(COMM\)](#)
To: [Nelson, Casey \(COMM\)](#)
Subject: FW: PUC Docket No: PL6668/PPL-13-474
Date: Friday, April 04, 2014 5:38:25 PM
Attachments: [SMN-4-4-14-Comments.pdf](#)

Larry B. Hartman
Environmental Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

larry.hartman@state.mn.us

Phone: 651-539-1839

800-657-3794

Fax: 651-539-0109

Cell: 612-210-4810

mn.gov/commerce/energy/facilities

From: SHARON NATZEL [mailto:sorgwwah@aol.com]
Sent: Friday, April 04, 2014 3:53 PM
To: Hartman, Larry (COMM)
Subject: PUC Docket No: PL6668/PPL-13-474

Dear Mr. Hartman,

I have attached my comments on what human and environmental impacts should be studied in the comparative environmental analysis on 13-474 Sandpiper Pipeline Route which is open for comments until 4/4/14 4:30 PM.

Please let me know that you received these comments OK and that you can read the pdf file OK.

Thank you! Sincerely, Sharon Natzel, 13623 County 20, Park Rapids, MN 218-732-5749

Sharon Natzel
13623 County 20
Park Rapids, MN 56470

April 4, 2014

Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

larry.hartman@state.mn.us

Reference: PUC Docket Number: PL6668 / PPL-13-474

Dear Mr. Hartman,

I reviewed the PUC Dockets for the Sandpiper Pipeline 13-473 and 13-474 paying special attention to the preferred southern route.

The following human and environmental impacts should be studied in the comparative environmental analysis (CEA). The method to be used for studying each of these impacts should be a scenario methodology using leaks, ruptures, spills and explosion scenarios.

Our national security and ability to sustain our population's food production, fresh drinking water and transportation fuel needs by supplying crude oil for refining production needs to be looked in the comparative environmental analysis. This is especially important since the preferred southern route would be cumulatively carrying oil in the planned pipeline corridor that would be needed to fuel our nation and at the same time the preferred southern route travels over the vast amounts of fresh water resources in MN and the 4 major water basins that supply the US and Canada. The route also touches the Great Lakes. The continental divide affects how waters flow and need to be considered in the CEA scenario analysis. International hostilities and war-time retaliation to damage our life-sustaining natural resources that supply our nation should be considered in the scenario methodology as described above. A siege is not unthinkable today.

The explosion scenario is important to examine because of the gasoline-like properties of the crude oil based on the report by Canadian Transportation & Safety Board in investigating the 2013 Quebec derailment. The Bakken crude oil and the tar-sands oil for Line 3 replacement are both similar in nature to that oil involved in accident above. The cumulative effects need to be

considered now in these scenarios for both the Sandpiper Pipeline at 30" and the newly announced Line 3 replacement pipe depicted on the southern Sandpiper Pipeline route on 4/2/14 at Enbridge Partner Investor Meeting with completion planned in 2017 with 36" pipe.

Human impacts associated with human consumption of water, air and food need to be considered along with crop production, food manufacturing and dairy production. The Mississippi River supplies drinking water for several communities in Minnesota, including Minneapolis where over a half million people rely on the Mississippi river daily alone. The Mississippi River is used for drinking water by communities downstream of Minnesota too. Navigational waters support barge traffic and the discharge of waste waters is allowed as permitted by EPA. Based on www.waterencyclopedia.com the river generates close to \$2 million annually from commercial fishing and over \$1 billion from Upper Mississippi River recreation alone. Environmental impacts to the rich diversity of 241 species of fish and 37 mussel species who live in the river need to be considered. Plus the floodplain includes the largest continuous system of wetlands in North America and is used by up to 40% of North America's waterfowl and wading birds.

Although the statistics regarding Hubbard County did not show tourism as any part of our area's assets, there is \$30M contributed annually to our area because tourists like to come and enjoy the pristine waters of our area. The scenario methodology impact needs to consider this. I know myself that we had planned a trip to Alaska and when the oil spill with the Valdez occurred, it took us 12 years to determine to vacation there. A leak in northern MN near the Headwaters of the Mississippi would severely damage our water-based vacation destination image and take years to correct.

There is software available in the oil industry that allows for linear facility route optimization. A quick search on the internet shows that Iran utilizes this type of software for optimum oil route design. This type of software should be used to maximize the human impacts and environmental impacts in terms of the pipeline route. The Kalamazoo spill by Enbridge was a result of the compliance with all State and Federal Standards based on my understanding. Therefore, using the same old techniques will only produce similar results. The CEA should utilize linear facility route optimization especially with the human impacts and the environmental impacts as outlined above.

The GIS shape files for the Sandpiper Pipeline Route were not made available to the public in a timely fashion in order to utilize the information for alternate route development by the public. This unfortunate fact didn't allow the most effective development of the route using the various layers of natural resources that is available to the public from the MN DNR Data Dely.

Therefore, the CEA should utilize this MN DNR Data Dely with the layers of natural resources information and determine the most effective route taking into account the human and environmental factors above. This should be utilized on the routes and route segments proposed by the public also to ensure the route is the most effective for the long term. With the fresh clear water, highest groundwater contamination susceptibility and oil all on the same Sandpiper Pipeline route, plus the Line 3 Replacement with 36" pipeline with in-service date of 2017 depicted on the south preferred route as of 4/2/14 at the Enbridge Partners Investor Relations meeting, the cumulative effect demands the Full Environmental Impact Statement.

The full life cycle of the pipeline technology needs to be examined by the CEA for the human and environmental impacts listed above. When the pipe is no longer useful and is to be replaced, part of the life-cycle plan needs to include the removal of the pipe so that the corridor resource space may be reused and maximized. The care, testing and maintenance of the pipeline should be considered in placement to ensure damage does not occur to another pipeline in the corridor. Prevention of additional damage incurred as digs to repair a known problem on another pipe need to be avoided - - yet planned for in the CEA scenario analysis.

It is highly desirable that the PUC and the customer North Dakota Pipeline Company LLC have transparent plans and information available regarding the Sandpiper Certificate of Need and the Sandpiper Pipeline Route and now the cumulative effect of the Line 3 replacement as it relates to Hubbard County and others along the proposed southern preferred Sandpiper Pipeline route. The first open house that Enbridge invited the public to in the Park Rapids area was an ingenuine attempt at community relations and education in my mind. In checking the facts, the invitation was not a paid ad, so the local newspaper did not even have to choose to place the ad. However, the ad was run in the Park Rapids Enterprise in the Wed edition (usually not received until late in the day in our rural area) for the short Sat open house to follow in 3 days. That is not enough public notice to emphasize a genuine attempt to educate the public about an important project such as this – especially with the cumulative effect and corridor scenario. Yet when the public complained that they didn't know about the pipeline until late Autumn 2013, the PUC upheld the fact that an open house was held by the customer in August. Thus far multiple requests by honorable institutions have been denied by the PUC for an additional public meeting in the summer and an extended comment period until Aug 1, 2014. The Hubbard County Residential Non-Homestead parcel landowners that number 10,953 as compared to the 6,747 Full Homestead parcel landowners (a ratio of almost 2 to 1) deserve a chance to participate in a public meeting and be allowed to comment instead of closing the comments at 4:30 PM 4/4/14. In the northern MN area, this ratio of seasonal snowbirds to full time residents would also be true in the areas along the route in addition to Hubbard County.

If you have any questions about the information I've provided above, please let me know.
Sincerely, Sharon Natzel, 13623 County 20, Park Rapids, MN 56470

Sharon Natzel
13623 County 20
Park Rapids, MN 56470

April 3, 2014

Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul MN 55101

larry.hartman@state.mn.us

Reference: PUC Docket Number: PL6668 / PPL-13-474

Dear Mr. Hartman,

I reviewed the PUC Dockets for the Sandpiper Pipeline preferred southern route. The Hubbard pump station is shown on two maps in the Initial Filing - Notice Plan Proposal, filed on behalf of Enbridge Pipelines (North Dakota) LLC, Document ID 20136-87955-01 received date 06/07/2013, pg 14 and 38 in pdf file. The Hubbard pump station would be utilized when the sandpiper pipeline increases the barrels per day beyond the initial minimum is my understanding based on Clearbrook public meeting information. I have described below the human settlement, natural environment, archaeological and historic resources in this area of the proposed Sandpiper Pipeline Route near Hubbard. However, these features are very similar across the entire route in Hubbard County, near Itasca State Park, and across the entire northern Minnesota route.

The 4/2/14 EnbridgePartners.com Line 3 replacement plan map in the Enbridge Partners investor conference materials shows the Sandpiper Pipeline Route will be utilized for Line 3 replacement (a 36" pipeline). Therefore the cumulative effects of the 2 pipelines – both Sandpiper and Line 3 - in the preferred southern route corridor need to be considered now along with the Sandpiper Pipeline Route. If there are other planned pipelines for the proposed Sandpiper Pipeline / corridor that I have missed identifying here, these cumulative effects need to be taken into account also. Our northern Minnesota fresh water resources are a critical natural resource for MN, the United States and the world. We cannot risk polluting the fresh water with oil due to a pipeline leak. This includes the Mississippi River, the Red River, the 4 major Water Basins the project crosses, the groundwater and the aquifers along the preferred route.



I request that predictable leaks and spills be fully described in the Department of Commerce's environmental analysis by "scenario" method including the cumulative effects.

I request that a Full Environmental Impact Statement similar to the EIS done on Pebble Mine, Bristol Bay, Alaska because of these human and environmental features in Hubbard Township, which are similar to features in Hubbard County, near Itasca State Park, and across the entire Minnesota route.

These are unique human and environmental features in this area that would be susceptible to contamination and irrevocable damage in a leak / spill / explosion scenario:

- This area of Hubbard County in Hubbard Township near Hubbard, MN contains spring-fed Long Lake which has 500 unique landowners of parcels on the lakeshore itself, 3 resorts, a declining heron rookery, is a cisco refuge lake, and is in the DNR's Straight River Groundwater Management Area to ensure that use of groundwater is sustainable and does not harm ecosystems, water quality, or the ability of future generations to meet their needs. Several wells on the east side of Long Lake area have nitrate levels above 10 ppm level and is not suggested as suitable for use with babies and elderly consumption.
- Within the town of Hubbard itself, there are Native American Indian Mounds. These are of archeological significance. There are also Indian Mounds at Itasca State Park. The Native American's treaty rights as agreed to by our ancestors must be taken into account with the location of the sandpiper pipeline route and risks to the environment that support their way of life. The wild rice lakes along the Sandpiper route contribute significantly to help make Minnesota the annual supplier of over 50% of the world's hand-harvested wild rice based on MN DNR information.
- Close to the Hubbard Pump Station there are organic farm fields and an organic dairy farm which produces organic milk. These would be especially harmed irrevocably in a spill/leak scenario as it would take much longer to really "clean up" and regain the organic status capability as compared to regular farm fields not specifically designated as organic in nature.
- Close to the Hubbard Pump Station is the Hubbard Prairie – an area of abundant farm fields that drew settlers in the 1800's and which today are irrigated during the summer growing season and grows a variety of produce including potatoes, beans and corn. Contamination of the groundwater would quickly damage crops and the soil would be altered irrevocably.
- We have had drought conditions in the past few years off / on and "no burn" days have increased. Last May, 2013 we had a huge forest fire that was close to this area – the Green Valley fire. Fire from interaction with a power line right above the pipeline, from an electrical storm, or from accidental human causes similar to the fire associated with irrigation equipment, ammonia and vapors as occurred 2 summers ago in a farm field just south of where the Hubbard Pump Station is depicted on the maps.
- Based on the Canadian Transportation and Safety Board investigation in the content of the trains that derailed last summer at Lac Megantic, Qc the oil acted like gasoline. In the conclusion of the report in section 4.3, it is stated: The occurrence crude oil's properties

were consistent with those of a light sweet crude oil, with volatility comparable to that of a condensate or gasoline product. Now with the Bakken oil being similar in nature to the product involved in the Lac Megantic Qc derailment, the contents of the Sandpiper pipeline would act like a gasoline fire increasing the risk of explosion. The local contracted fire department would be over 10 miles away. The forests and fields and 500 homes around the lake and surrounding farms would be in grave danger. For spills. Who trains and outfits the fire department and the rapid response team?

- Long Lake residents fall into two basic categories – full time and seasonal residents. Of the 500 unique landowners of record in 2013, 136 of these are Full Homestead parcels based on Hubbard County GIS data. There are 364 unique landowners that are non-homestead parcels - - the seasonal residents.
 - This 2 to 1 ratio of seasonal residents typically at their property May – Sept is true not only for Long Lake in Hubbard Township, but also across the Hubbard County area where there are 6,747 Full Homestead Residential parcels and seasonal Residential Non-Homestead parcels are 10,953 based on 2014 Hubbard County Assessor Office information.
 - These seasonal residents require the same public information meeting availability and comment period capabilities when they are here in Hubbard County during 2014. I ask you to extend the comment period until Aug 1, 2014 adding a June public meeting because of the ratio of 2 to 1 of seasonal landowners and were not able to fully participate in the PUC process.

Thank you for considering my requests for the greater good of Hubbard Township, Hubbard County, Itasca Park, the Mississippi River, the Red River, the clearest waters, the most susceptible to contamination groundwater, our already challenged aquifers, the wild rice lakes, the tourism industry, agriculture and our future as Minnesota, the land of 10,000 lakes!

Sincerely,

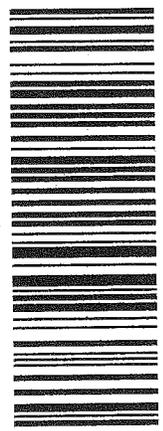


Sharon M. Natzel

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Larry Hartman, Environmental Review Manager
Energy Environmental Reviews and Analysis (EERA)
Minnesota Department of Commerce
85 7TH Place East, Suite 500
St. Paul, MN 55101

