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**COMMENTS BY  
THE CLIMATE CRISIS COALITION OF THE TWIN  
CITIES ON THE NORTH DAKOTA COMPANY'S  
SANDPIPER PIPELINE PROJECT  
PUC DOCKET NUMBER: PL-6668/PPL-13-474**

## **INTRODUCTION**

The Climate Crisis Coalition of the Twin Cities is vehemently opposed to the proposed Sandpiper Pipeline being run across Northern Minnesota for a multitude of reasons. Our environmental concerns are many, and we have outlined some of them below.

## **THE GREENHOUSE GAS FACTOR OF EXTREME ENERGY EXTRACTION**

The hydraulic fracturing of tight shale oil in North Dakota's Bakken Formation is a form of extreme energy extraction Earth's climate can ill afford. The drilling, transporting, refining, and ultimate combustion of Bakken sweet crude are all energy-intensive activities in and of themselves that add tremendously to the greenhouse gas emissions that are causing global heating. Hydraulic fracturing causes the release of vast amounts of methane, which is trapped in the tight shale formations. As a greenhouse gas, CH<sub>4</sub> is 23 times more potent than carbon dioxide and has a half-life in the atmosphere of 1,000 years. Even small amounts of methane have a large climate-forcing effect. Because of the constant pressure on seams, joints, and valves, the systems leak gases during transfers. Each one percent lifetime production leakage from a wellhead has the same climate impact as burning the natural gas twice, amounting to double the CO<sub>2</sub> emissions.

Since producers in North Dakota are concerned solely with drilling petroleum, they deliberately flare vast quantities of methane—some 100 million cubic feet per day. These ten-foot flames are so numerous they can be seen from space by satellite. The burning of natural gas still amounts to 50% of the carbon emissions of coal-fired power plants, which is not an insignificant quantity.

Global carbon dioxide levels reached 400.2 parts per million (ppm) atmospheric concentration at the Mauna Loa Observatory in late February, *two months* before the typical annual maximum, which usually occurs in late May or early June! The current rate of increase at 2.6 ppm is unprecedented in the planet's geologic history, indicating that we are rapidly moving into an ever-more dangerous future.

## **CATASTROPHIC CLIMATE CHANGE**

Because of rapidly accelerating climate change, the planet's ice masses are melting at an alarming rate, sea levels are rising, and extreme weather disasters are increasing in intensity, duration, and frequency, causing suffering, death, species extinction, crop failures, water shortages, and the costly destruction of homes, livelihoods, and infrastructure. This state of affairs is directly linked to the seemingly endless and reckless burning of fossil fuels

and is occurring while firms such as NDPC want to expand what we call the Path of Destruction—the vast network of pipelines used to deliver fossil fuels to refineries and marketing hubs— which enables America’s fatal addiction to oil. The attitude of the pipeline company and the extraction industry it serves is: The climate be damned! Full speed ahead on profits! The thinking of money-mad Energy Giants is insane, and their genocidal actions unpardonable.

## **THE ENVIRONMENTAL DESTRUCTION OF FRACKING TIGHT SHALE OIL**

Northwestern North Dakota is now a national sacrifice zone due to the out-of-control hydraulic fracturing of tight shale oil. If the proposed Sandpiper Pipeline is built, Minnesota will be intimately linked to this ecological and social disaster.

With roughly 8,000 wells operating (And five times as many expected to be drilled in future), there are thousands of waste pits filled to the brim with toxic produced water, flowback containing poisonous fracking chemicals, and brine. Waste pits, whose contents include hydrocarbons, fracking chemicals, heavy metals, and radioactive materials, are notorious for leaking into the ground and poisoning soils when their liners tear, overflowing during heavy rains, and bursting their dams. According to North Dakota public records, more than 1,000 accidental releases of oil, drilling wastewater, and other fluids occurred in 2011. A spill of two million gallons of brine sterilized 24 acres of farm land. Fly-ash from coal-fired power plants is being used to reinforce the wastewater pits, resulting in arsenic contamination. Near Williston, cattle and household pets have died due to exposure, and humans are showing high levels of arsenic in their urine.

North Dakota’s Oil Patch lies within four counties bordering on the Missouri River. It sits directly on the Fort Berthold Indian Reservation, which gets its drinking water from the Sakakawea Reservoir. Therefore, the constant threat of contamination exists for the Three Affiliated Tribes, who reside there. In fact, high levels of benzene, toluene, and methane along with ethylene dichloride, a solvent used to remove oil and grease from metal pipes and to bond cement, were found in the well water of a ranch near Williston by an independent testing company.

North Dakota finally outlawed the use of waste pits and now requires that wastewater and brine be pumped into injections wells, which are increasing in number. With frackwater injection, the likelihood of earthquakes greatly increases since human-induced seismic activity has occurred in Ohio, Arkansas, and Oklahoma, from pressure increases and the subsequent disturbance of old faults in the geologic formations.

Three million gallons of freshwater are used per oil well in an arid, drought-stricken region of the Great Plains. This is overdrawing aquifers and lakes and robbing the local population of needed drinking and irrigation water. Ranchers also need water for their livestock.

It requires 2,000 truck trips for one oil well in its first year alone to haul product to train terminals and waste water to injection wells, with dangerous levels of traffic pounding local roads into oblivion day and night. Traffic fatalities have risen dramatically and local infrastructure is being destroyed because the roads are not built to withstand the heavy loads.

It is ironic that the starting point of the proposed Sandpiper route begins at Tioga, ND where a large oil spill of 800,000 gallons badly contaminated a farmer’s wheat field. This does not bode well for the future.

From the experience of fracking shale gas in the Marcellus, Barnett, Eagle Ford, and Niobrara formations, we know that fracking fluids migrate through rock formations and contaminate groundwater with frack chemicals and methane. The water becomes undrinkable, and natural gas drillers have had to provide bottled water for communities such as Dimock, PA.

Northwestern North Dakota's communities are now dominated by a boomtown atmosphere with a rising crime rate, gambling, drug and alcohol abuse, and prostitution. Much of the labor is migratory, and a good deal of the income is leaving the state to support families back in the workers' home towns. Housing shortages are problematic because of all the industrial workers who have flocked there from elsewhere in the country. This means exorbitant rents with greedy landlords charging all the traffic will bear. Another unfortunate side effect has been the displacement of local people, who have been forcibly evicted from apartments and trailer parks and left homeless. It has been particularly hard on the Indigenous population.

## **WEAPONS OF MASS DESTRUCTION**

It is no secret that NDPL is owned by Enbridge, which has a long and shameful history of pipeline spills in the Upper Midwest. Its leaky lines have contaminated the environment 804 times since 1999 and leaked 6.8 million gallons of oil. In Minnesota there were 57 Enbridge spills from 2000-09 with \$36 million in damage. All pipelines leak for various reasons. In fact, spills are a matter of routine, and these networks are nothing less than weapons of mass destruction. Ruptures and leaks occur at refineries and pumping stations because of overfills, pump failures, faulty valves, poor horizontal and circular welds, sloppy seals, stress, corrosion, equipment failures, and operator errors. Explosions are not uncommon. In 2007, two workers were killed at Clearbrook, MN. For all the foolproof, fancy equipment Enbridge claims to have, it has failed to detect spills more often than not. The truth is it's the smell that tells. Tesoro's "pig" detector failed entirely to find the Tioga, ND spill. It was that unfortunate farmer's nose that first discovered the disaster flooding his field.

## **THE HIGH VOC CONTENT OF BAKKEN SWEET CRUDE**

As a result of the horrible oil-train explosion and fire that occurred in Lac-Megantic, Quebec, which incinerated 49 innocent people, we now know that Bakken sweet crude contains a high level of volatile organic compounds (VOCs). The presence of large amounts of VOCs makes it especially dangerous to transport by both rail and pipeline. Because of its high volatility, pipeline explosions and fires could result in the presence of high temperatures, sparks, static electricity, or lightning.

## **LINGERING POLLUTION AT LAC-MEGANTIC**

Lac-Megantic's train disaster spilled 7.2 million liters of light crude into the environment. Remaining are extremely high concentrations of carcinogenic polycyclic aromatic hydrocarbons (PAHs) and arsenic, which have been detected in surface water there. They exceed the Canadian government's "acceptable standard" of PAHs by 28 times. It is to be expected that if a spill from the Sandpiper were to occur, it would have the same devastating effect on the aquatic environment.

## **RUNNING ROUGHSHOD OVER PEOPLE'S PROPERTY RIGHTS**

In the name of the “public good”, Enbridge has been running roughshod over people’s property rights in order to have free rein to build their scurvy pipelines. They’ve systematically destroyed ordinary folks’ trees, wells, septic systems, agricultural and grazing lands, and organic fields. If landowners refuse to submit to the destruction of their holdings for easements and right-of-ways, company attorneys harass them mercilessly in the courts screaming, “Eminent domain!” at the top of their lungs.

## **PERMANENT ECOLOGICAL DAMAGE**

Every spill that occurs does incalculable damage to our air, soil, and water. Fragile ecosystems and wildlife habitats are altered forever because there are limits to how much biodegradation of the oil can actually be accomplished by microbes. Petroleum-covered vegetation dies almost instantly, altering the make-up of plant communities and opening the way to harmful invasives. Oiled wildlife such as birds have poor survival rates despite well-meaning attempts to rescue them. There are massive die-offs of aquatic life from the bottom of the food chain on up, and fish are rendered inedible. Fine particles of petroleum enter aquatic life on the submicroscopic level, undermining its ability to function systemically.

Many hydrocarbons are endocrine disruptors, which affect the reproductive, immune, and nervous systems of all life—aquatic, terrestrial, and human. Certain substances bioaccumulate through the food web and also have impacts on future generations. The marine ecosystems of Prince William Sound and the Gulf of Mexico have yet to recover from the disastrous oil spills that occurred in those places.

## **DAMAGE TO HUMAN HEALTH**

Exposure to hydrocarbons at extraction, refining, and spill sites causes widespread damage to human health. Developmental and behavioral problems are brought on by exposure to PAHs. Cardiovascular, dermal, gastrointestinal, neurological, and respiratory symptoms have been found among oil-spill victims. One whiff of toxic toluene or benzene brings on immediate headache, nausea, and vomiting, while long-term exposure can result in severe neurological damage or cancer. The chemical dispersants used to clean up oil spills are equally as toxic since they contain surfactants, a variety of hydrocarbons and other toxic compounds.

## **THE VIOLATION OF INDIGENOUS SOVEREIGNTY**

The 610-mile pipeline from Tioga, ND to Superior, WI, carrying 375,000 barrels of oil per day, would cross through White Earth Indian Reservation’s four townships and pass near Big Rice Lake and Itasca State Park. Enbridge is claiming 2,000 rights-of-way and wanting tribal support. We do not blame the Anishinaabe People if they do not want to lend it since a toxic oil spill would ruin their farmland, wild ricing wetlands, and other hunting and gathering grounds. Oil and water, which is the essence of life, do not mix! We support the Ojibwes’ right to live sustainably off of tribal lands and ceded territories. There should be no interruption to their living their traditional way of life. Another pipeline on tribal lands is just another violation of their treaty rights. We call for an end to this sort of environmental racism exhibited toward sovereign First Nation Peoples and support their demand for environmental justice.

## **ALTERNATE ROUTES?**

The Climate Crisis Coalition supports neither the northern nor the southern route for the proposed Sandpiper Pipeline. We are opposed to the construction of any more pipelines

and are for the complete dismantling of the Path of Destruction throughout North America.

### **THE NEED FOR CLEAN, RENEWABLE ENERGY—THE *REAL* ALTERNATIVE**

The solution to this holocaust in the making is to leave all fossil fuels in the ground, reduce greenhouse gases to zero from all sources, and convert completely to renewable wind and solar energy and clean mass transit powered by the same. This must be done as soon as possible for the sake of the climate and all life on the planet. No more foot dragging and stalling! Retooling with renewables will provide vastly more green jobs than those currently found in dirty, unsustainable industries.

### **CONCLUSION**

In conclusion, the Climate Crisis Coalition of the Twin Cities strongly urges the Public Utilities Commission to deny the pipeline routing permit. In drafting a comparative environmental analysis, we also strongly urge that all of the above climatic and ecological concerns we have mentioned are taken into serious consideration.

Respectfully Submitted, Christine Frank, Coordinator 115 Second Avenue South, #714  
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