

Hartman, Larry (COMM)

From: Ann Manning <anncmanningmn@gmail.com> on behalf of Ann Manning <ann@anncmanning.com>
Sent: Thursday, May 29, 2014 10:52 PM
To: Hartman, Larry (COMM)
Subject: Re: The proposed Sandpiper Pipeline Project, Docket Number 13-474

Mr Hartman, I am strongly opposed to the proposed Sandpiper Pipeline.

There are so many reasons to oppose this pipeline. I will list only a few.

1. As a white, 66 year old Minnesota woman, I am deeply saddened that we are not honoring the treaty rights between our State and the White Earth Ojibwe. I feel a strong obligation to uphold the agreements of my ancestors and will work to stand beside the people of White Earth and other Minnesotans to protect those rights. They deserve to have FREE, PRIOR AND INFORMED CONSENT before any pipeline can be built or expanded in any area that would threaten their water, air or soil.
2. I am leading a group of women in this state and nationally to stand up for the rights of Future Generations. Our national Congress will be in the TC in November of 2014. The growing awareness and willingness of women to act in protection of the planet is a force to be behold. I am more amazed every day that the grand mothers of this world are waking up and taking note. it is wrong to take such terrible risks with our natural world. We must become the 'beloved ancestors' and take strong stands against this kind of continued high risk strategy. We know the pipelines will leak; we simply do not know when or where.
3. Enbridge: I'm sure you are quite well versed in the track record of this company. Why would we even think of letting them near our precious lakes and rivers?

I'm well aware of the pressure on you to approve this. I can only ask you to consider what your answer would be the day you take your last breath. Make sure that is the answer you give now.

Maya Angelou says it best: "Courage is the most important of all the virtues because without courage, you can't practice any other virtue consistently."

Thank you for your service and consideration of my thoughts.

Ann Maning
initiative Director, Future First 2014 Women's Congress

Note: I am speaking for myself as a Minnesotan; not our national organization.

February 5, 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

#13-474

Dear Mr. Hartman:

I am writing in support of the Carlton County residents working to minimize the damage that will be caused if the Sandpiper pipeline corridor is constructed. Since this venture is a for-profit endeavor by a private business, they should use any one of the viable route alternatives endorsed by elected Carlton County officials, the Soil and Water Conservation District and Wrenshall Township supervisors.

The proposed route is in the best interest only of Enbridge.

The proposed route is not in the best interest of the immediate public, the landowners and farmers being forced to accept the damage and the risks of a new pipeline corridor. Routing the corridor through the abandoned railway or existing right-of-ways will help hold Enbridge accountable for their spills and leaks, rather than foisting that burden onto the landowners. Enbridge should not be allowed to reap all the profits without incurring the risks; the landowners should not be forced to take on the risks when they will not share the profit.

The landowners have demonstrated active stewardship that protects and enhances the natural resources, serving the neighboring and extended public with sustainable forms of fresh, local agricultural products. The loss of prime farm land is a national concern, especially in light of global climate changes, which are shifting food production north. Even the most cursory look at the spill and leak record reveals Enbridge's lack of demonstrated stewardship, protection or enhancement of their pipeline routes.

The proposed route is not in the best interests of the neighboring public, their customers who depend on the resources being provided by the landowners. The neighboring public will share the risks without any possibility of benefitting financially from the pipeline.

The proposed route is not in the best interests of the extended public, which includes me, a resident of the Lake Superior Basin. As a resident of a county known for its excess of heavy clay soils, well-cared-for, healthy, friable soil is black gold. These landowners do the day-by-day work of protecting and improving the health of their lands. Their stewardship has created ongoing increases in the availability of fresh, local agricultural products. Carlton County's prime farmland is the most productive in the region, earning the title of the breadbasket for northeastern Minnesota.

The justification for this pipeline corridor should include the needs of, and impacts to, the people it will affect directly; it should include more than the purported need of the company to increase profits. The profits of this company benefit a handful of people for the immediate moment; conversely, the farmers, if allowed to farm without harassment, will benefit thousands, for as many generations as there are farmers who will farm. The pipeline will destroy many acres of

woodlots, maple syrup woodlots, and hay and row crop fields, some of the most productive soils in the region. These are losses that would take generations to recover, if that is even feasible.

Lake Superior holds ten percent of the world's fresh liquid surface water. Protecting this resource is a national and international concern. Cutting through acres of forested areas with highly erodible soils raises the risk that tons of sediment will wash into the creeks, streams and rivers, ultimately into Lake Superior. Compromising the health of this lake and its tributaries is neither wise nor in the best interests of the states, nation or world.

Six crude oil pipelines already run through this area. It is hard to see that another corridor is needed to serve the North Dakota oil fields as stated, since the flow from those fields has been projected to last only a few years. Using the North Dakota fields as an excuse to install infrastructure that would facilitate the transfer of Canadian tar sand crude should not be aided or abetted. Nor should Enbridge's abysmal record of spills and other environmental noncompliance be ignored or rewarded.

That Enbridge will not meet with landowners except one-on-one speaks of an aggressive, war-like tactic of divide and conquer. This way of doing business is not in the best interests of any community, and should not be condoned or supported.

The proposed route would save Enbridge money; this wealthy international and privately owned company would have higher profit margins. Eminent domain is most commonly defined as: "The power to take private property for public use by the state and municipalities." The use of eminent domain to save and make Enbridge the most money is an abuse of the spirit and intent of that power. Not one neighbor in Carlton County would be allowed to install infrastructure that divided homesteads, cut down centuries-old trees, converted treed wetlands into grassed areas thereby destroying the work of the Soil and Water Conservation District, so their business could make more money. Clean water and food are higher national priorities than increasing private corporate profits. So again, since this venture is a for-profit endeavor by a private business, they should use any one of the viable route alternatives endorsed by elected Carlton County officials, the Soil and Water Conservation District and Wrenshall Township supervisors.

Thank you for considering these points.

Sincerely,



Bonita Martin
9026 East Bayfield Road
Poplar WI 54864

#13-474

Please no oil in the wild rice
food on the water not oil

Chulo Martin

RECEIVED

MAY 21 2014

MAILROOM



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Adrienne Martinez
PO Box 464
Bagley MN 56621

Representing: White Earth

Email: _____

Address: PO Box 464
Bagley MN 56621

Tel: 218 358 0821

COMMENTS

Do not want on our land!

~~to many~~ ~~best~~ This will
destroy our natural land resources
and affect our animals..

Please submit comments at meeting to EERA staff or send to:

Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
Voice: 651-538-1839
Fax: 651-539-0109

Electronic Submittal: <http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>

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Comments Continued:

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**Larry B. Hartman
Energy Environmental Review and Analysis
MN Dept of Commerce
85 7th Place E, Ste 500
St. Paul MN 55101-2198**

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5510136013 C012



#13-474

Larry Hartman,
STOP the pipeline!
Jany Mauricio

RECEIVED

MAY 21 2014

MAILROOM



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Lamar McCormick Representing: _____
612-810-6844 Email: _____
270 N Walnut St. Apt 210 Address: _____
Chaska MN 55318 Tel: _____

COMMENTS

If the pipeline is going to be layed, the people need to be considered. Destruction of a sovereign land is against the Law. Please be wise, and work ~~the~~ with the people of White Earth.

Please submit comments at meeting to EERA staff or send to:

Larry B. Hartman
 Energy Environmental Review and Analysis
 Department of Commerce
 85 7th Place East, Suite 500
 St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
 Toll Free: 800-657-3794
 Voice: 651-538-1839
 Fax: 651-539-0109

Electronic Submittal: <http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>

»»»If mailing, fold along dotted line in sequence noted and tape closed «««

Comments Continued:

Five horizontal lines for writing comments.

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Larry B. Hartman
Energy Environmental Review and Analysis
MN Dept of Commerce
85 7th Place E, Ste 500
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Rice, Robin (PUC)

From: Wayne Melby <wayne.melby@gmail.com>
Sent: Tuesday, March 11, 2014 11:56 AM
To: staff, cao (PUC)
Subject: Pipeline through Hubbard County

As a resident of Menahga growing up, and a cabin owner (Duck Lake) since 1978, I have the utmost concern about what an oil pipeline will do to the environment of an agricultural county and "the Lakes Area" of our state. First of all, the forests were removed for potato fields (pesticides and depletion of aquifers) and now the threat of oil spills. I understand that this pipeline's track record isn't that good. What are we leaving for our children and grandchildren to enjoy in their future? What ever happened to the Big Woods we learned about when we were young? Now we are going to threaten our lakes and soils with pollutants??? I understand how important jobs and money have such an influence on decisions of this nature, but we are Minnesota..Land of 10,000 Pure Lakes! We are a state of amazing agriculture and outstanding beauty. Let's keep it that way. Concerned Hubbard County Resident. Donna M. Melby

Sent from my iPad

Hartman, Larry (COMM)

From: Grant <gjmerritt@comcast.net>
Sent: Monday, March 03, 2014 8:36 AM
To: Hartman, Larry (COMM)
Subject: Enbridge pipeline

Greetings, Larry----didn't we know each other some decades ago over the power line fracas? And you are still fighting the good battles---or are the Enbridge folks flexing their muscles with the powers to be over there in the bureaucracy?

I am interested in stopping this so-called Sandpiper pipeline for several reasons, principally, so far, because I am afraid it will result in Bakken oil being shipped out in tankers on Lake Superior that could result in a major disaster for our great lake.

How about coffee sometime so I can learn more about this proposed pipeline. Bear in mind I had to deal with 17 pipeline breaks by Lake Superior pipeline in 18 months while I was at the MPCA.

Hope life has treated you well in the ensuing years. I remember you and George especially at the old State Planning Agency.

Best regards,

Grant Merritt

Hartman, Larry (COMM)

From: Ron Miller <speyfishing101@gmail.com>
Sent: Sunday, April 06, 2014 9:50 PM
To: Hartman, Larry (COMM)
Subject: Trout

Good Morning,

Not much to say except pipelines leak , and ENBRIDGE is despised in CA, as they cannot be trusted.

RHM

From: [Deborah Monicken](#)
To: [Hartman, Larry \(COMM\)](#)
Subject: Proposed Pipeline across Northern Minnesota over the Mississippi
Date: Friday, May 30, 2014 9:33:33 PM

From all I have reviewed, the probability of an oil spill from the proposed pipeline over the headwaters of the Mississippi River in northern Minnesota is inevitable. The work to define an environmentally safe pipeline route has not been a scientific nor unbiased investigation. The pipeline is not popular and it is discriminatory favoring a few industries while threatening the economy of an entire region to say nothing of the damage to the environment that may effect people's health.

How do you justify affording the oil industry this right of eminent domain when that very company has been irresponsible in building technology that would be safe and reliable? Why is the oil company the one determining the location based only on their own environmental bias? They have not demonstrated the ability to provide technology that would prevent oil leaks and they have not earned the public trust. When do you consider the rights and concerns of we the voters?

Sent from my iPad

From: [Melodee Monicken](#)
To: [#PUC_Public_Comments; Hartman, Larry \(COMM\)](#)
Subject: Docket # 13-474
Date: Friday, May 30, 2014 4:06:09 PM

REGARDING THE ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC
SANDPIPER PIPELINE PROJECT

PUC DOCKET NO. PL9/PPL-13-474. CERTIFICATE OF ROUTE APPLICATION

Melodee Monicken
17456 Half Moon Road
Park Rapids, MN 56470
May 30, 2014

Mr. Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us

Dear Mr. Hartman,

As a long-time resident of Hubbard County I am writing the PUC/DOC to state my opposition to the Enbridge and North Dakota Pipeline Company's (NDPC) proposed Sandpiper pipeline route through Hubbard County.

I do not believe this pipeline (not to mention the recently announced Enbridge plans to include the Line 3 rebuild in the same proposed corridor) is at all beneficial to the long-term economic and environmental health of Hubbard County, adjacent counties and the Minnesota lake country in general. Four pipelines already exist along the west side of the county and 7 pipelines cross the northern corner of Hubbard County. These pipelines have leaked in the past. Adding two more pipelines of the dimensions Enbridge and NDPC are wanting is too dangerous to Minnesota's lake country and Hubbard County's water assets.

Besides being home to Itasca State Park, Minnesota's oldest state park, and the Mississippi River headwaters, this area also has some of the cleanest, clearest lakes in the state. To date no aquatic invasive species have been found in any Hubbard County lakes. That's testimony to the diligence and proactive efforts of local residents. But these pipelines represent the greatest invasive species we can imagine. A pipeline rupture of the magnitude seen in Enbridge's Grand Rapids, MN spill (1.7 million gallons), or its Kalamazoo, Michigan spill (nearly one million gallons), would devastate this area, destroy property values and decimate our tourism industry. The Park Rapids Chamber of Commerce states that over \$30 million tourism dollars a year are spent here. People come from all over the world to walk across the headwaters of America's famous river, the Mississippi. Families enjoy the swimming, fishing and boating on our area lakes, over 400 of them within 25 miles of Park Rapids.

Hubbard County also is home to one of the most important and sensitive ground water basins in the state, the Straight River aquifer. It's important enough that the MN DNR has initiated a ground water study of the Straight River. This shallow aquifer provides drinking water for the city of Park Rapids and numerous residents with private wells. It also supports the county's largest

employer and revenue producer, LambWeston/RDO Industries' potato processing facility. If you like MacDonal'd's French fries, they probably came from potatoes grown over the Straight River aquifer. Locally, Lamb Weston/RDO employs 500 people and earns about \$500 million annually. As proposed, the Sandpiper pipeline would run through the heart of the Straight River aquifer, imperiling both the crops and our drinking water.

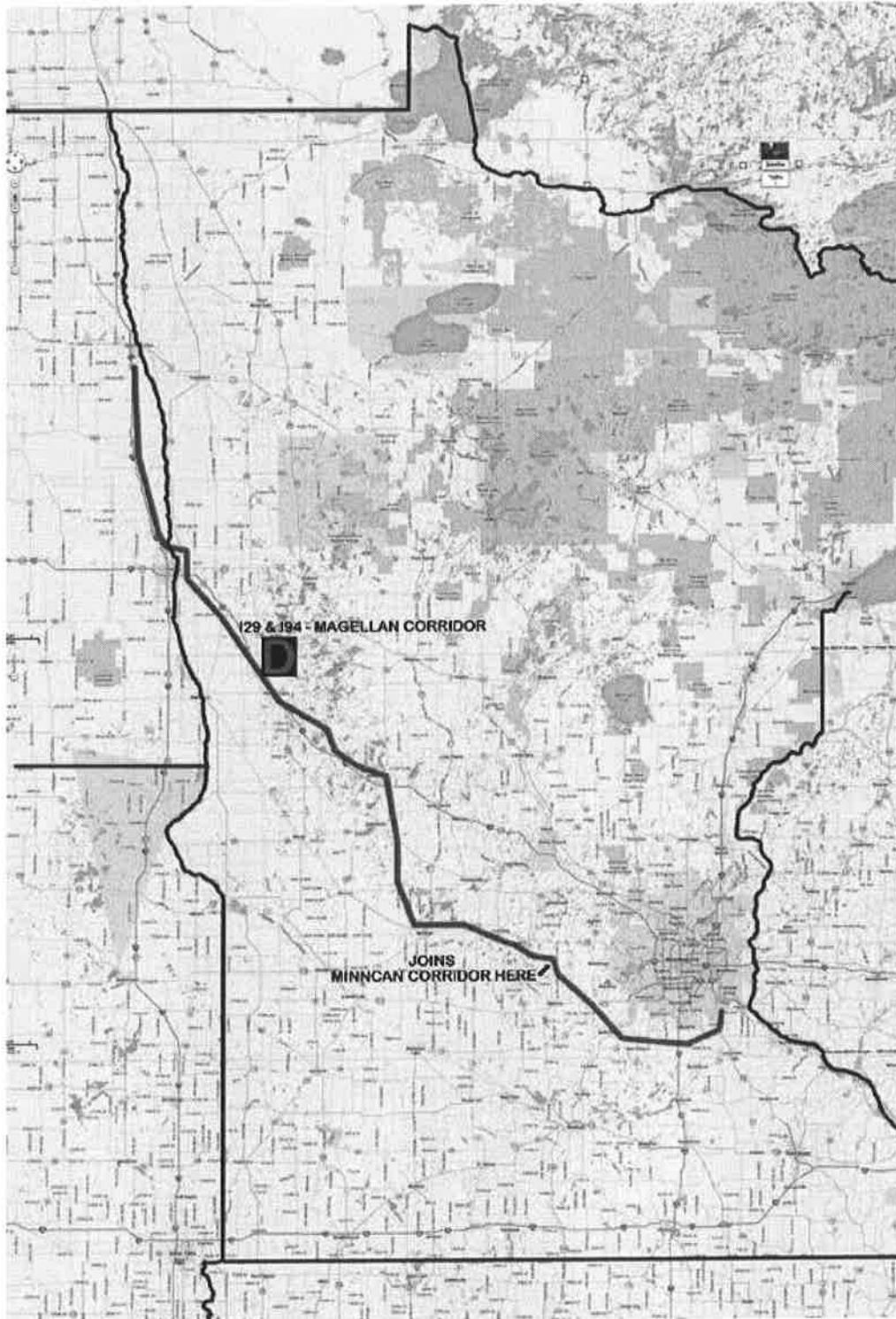
These pipelines also threaten one of Minnesota's prime brown trout streams, the Straight River. The trout thrive in the cold water springs that support the river. Imagine an oil spill in the porous, sandy soils of this shallow aquifer. How difficult would that be to clean up? Would the aquifer and our groundwater be permanently damaged? Could Park Rapids survive such a catastrophic hit to its prime water source?

Wild rice is another valuable crop to local residents and it grows on our numerous lakes. Besides being an important food source, wild rice is spiritually, culturally, and commercially critical to the Ojibwa Tribes in this region. As proposed, the Sandpiper corridor passes right through their best wild rice lakes.

Given these issues and Enbridge's history with spills here in Minnesota and elsewhere, I don't believe the "preferred southern route" is good for Minnesota or Hubbard County. Oil and water are a bad combination, and we have a lot of it here.

As I don't think Enbridge can keep lake country safe from oil spills, I suggest that the NDPC build this pipeline across a part of the state that is far less susceptible to the inevitable damage. Why do I say inevitable? One of the EPA's conclusions in the Bristol Bay EIS was this: "Thus, the probability of a pipeline failure occurring over the duration of the Pebble 2.0 scenario (i.e., approximately 25 years) would be 95% for each pipeline. In each of the three scenarios, there would be a greater than 99.9% chance that at least one of the three pipelines carrying liquid would fail during the project."

I have attached a map of my proposed alternative route.



As you can see, this pipeline route stays away from the lake country. It starts in eastern North Dakota near Grand Forks, follows the I-29 freeway corridor south, crosses the Red River downstream of Fargo, and bends around Moorhead until it merges with an existing pipeline corridor owned by the Magellan Company. The Magellan pipeline corridor parallels the I-94 freeway southeast until Alexandria, then bends south. At Willmar the corridor parallels MN Highway 12 east until intersecting the MinnCan corridor. At this point, my suggested alternate route follows MinnCan to the Flint Hills Refinery or the Saint Paul Park Refinery south of the

Minneapolis-St. Paul.

I believe this is a much safer route for the Bakken crude oil than the currently proposed route across the lake country. The soils are heavier with more clay so any spill would not spread into the groundwater as it might in the porous Straight River soils. It's mostly farmland which even Enbridge/NDPC admits (in public, we were there) is easier to build on, inspect, access, and maintain. There aren't many wetlands along the route. Since it is south of lake country there is no risk to the wild rice lakes, our fragile aquifers, sensitive trout streams, and our best vacation lakes. It's still in Minnesota so Minnesota pipe fitters and labor unions will still have the opportunity for construction jobs.

Enbridge sometimes claims this oil will be for domestic use, but since they are refusing to tell the public where and to whom the Bakken oil is going, we don't know. I guess it's closely guarded "proprietary information"--like the names of carcinogens in fracking fluid. Many in Minnesota would like the idea that oil flowing through our state is ending up at a Minnesota refinery instead of Superior. Maybe we could fill our cars with gasoline made from North Dakota Bakken crude oil-- instead of realizing, down the road, that Minnesota is absorbing all the risks of a pipeline that only serves the bottom line of those who are selling oil product to China.

Unlike many of my Hubbard County neighbors, I stay here for the winter so I'm really worried that those who winter elsewhere don't know how important this pipeline proposal is to the county's environment and water quality. I know that a number of our townships and even the county commissioners have sent resolutions asking the PUC to extend the public comment period on this pipeline route. WHY haven't those resolutions and letters of support been posted, as they arrived at the PUC? Some have been there for weeks. When the PUC solicits PUBLIC comment and the public provides it, surely it isn't the prerogative of staff as to when or whether they will post the public's commentary, just because that commentary includes the request for a longer comment period.

This was even more confusing to me when I saw that Enbridge was told by the PUC to make public the landowner list for the proposed Sandpiper route. They had until 3/31 to comply. Instead they wrote a letter stating that wouldn't comply and asked for a stay while they appealed the ruling. Pretty audacious. They ask for a "stay," but it doesn't affect any of their docket postings. People in Hubbard County request an extended comment period and PUC staff decides to hold back the supporting resolutions and letters from local townships, county government, and individuals. It's called the PUBLIC Utilities Commission. Why is the public treated so much worse than the corporation in this process?

When my "snowbird" friends return, they will be disturbed to learn the PUC has ignored these resolutions and letters of support requesting a longer comment period. They will also be angry (I know I am) that Enbridge and NDPC has refused to cooperate with requests to release their mapping information and landowner lists so that the public can learn exactly where they are planning to dig their pipes. People want to know exactly where the pipeline is, especially if it's near their homes. They want to know what will happen to their property values. They need to understand whether they will be liable if/when the oil leaks onto their land, lakeshore or river frontage. They need to understand whether construction traffic could impede or disturb their daily activities. Because Enbridge/North Dakota Pipeline Company, with PUC backing, didn't make shape files or landowner lists available, we don't know.

People always bemoan the electorate's apathy and our disengaged citizenry, but I think the PUC's process around pipeline routing could be one of the reasons for disengaged cynicism in our area. Many folks up here think it's hopeless to even speak up, that the "fix" is in, especially when they learn that Enbridge is already buying up easements, even before any state permits

allowing the project have been issued.

You know, Mr. Hartman, I was at the public hearing in Park Rapids. I listened to what people said there. With one exception, everyone spoke against the pipeline coming through this area. I also heard what you had to say, and I wondered if you were listening to the people of this area. We are worried about this project. We don't think it's good idea to mix oil with Hubbard County's wetlands, lakes, rivers, and fragile aquifer. A little quick cash during the construction will never offset the potentially devastating economic and environmental effects of a spill on our lands or in our waters. And the thought of Enbridge adding the Line 3 Rebuild pipeline in the same corridor is even more disturbing because more lines will proliferate.

There is more oil flowing through Minnesota than water flowing in our rivers. Minnesota gets a few pennies in tax dollars from the pipeline companies while millions upon millions of dollars in oil go by every day.

So why is Minnesota paid so little for so great a risk? And why hasn't the PUC demanded an Enbridge escrow account that could immediately fund the clean-up of inevitable leaks and spills in Minnesota? Enbridge, a Canadian company, claims a stellar record with regard to the environment, but Canadian records tell a different story:

2000: 7,513 barrels. Enbridge reported 48 pipeline spills
2001: 25,980 barrels. Enbridge pipelines reported 34 spills and leaks
2002: 14,683 barrels. Enbridge reported 48 oil spills and leaks, totalling 14,683 barrels,
2003: 6,410 barrels. Enbridge pipelines had 62 spills and leaks, totalling 6,410 barrels,
2004: 3,252 barrels. Enbridge pipelines had 69 reported spills, totalling 3,252 barrels
2005: 9,825 barrels. Enbridge had 70 reported spills, totalling 9,825 barrels of oil.
2006: 5,363 barrels. Enbridge had 61 reported spills, totalling 5,363 barrels of oil,
2007: 13,777 barrels. Enbridge had 65 spills and leaks, totalling 13,777 barrels of oil,
2008: 2,682 barrels. Enbridge had 80 reported spills and leaks, totalling 2,682 barrels
2009: 8,441 barrels. Enbridge had 103 reported oil spills and leaks, totalling 8,441 barrels,
2010: 34,122 barrels. Enbridge had 80 reported pipeline spills, totalling 34,122 barrels,
Total: 132,715 barrels of oil, more than half the Exxon Valdez spill of 257,000 barrels

For Minnesota, the risks are far smaller if the route for this pipeline (and Line 3) is south and west of lake country.

Please make Enbridge and the North Dakota Pipeline Company build their pipelines on a route that doesn't jeopardize the economy and future of this area. Minnesota shouldn't sacrifice the Mississippi Headwaters, the Straight River aquifer, and some of Minnesota's cleanest lakes, rivers and streams just because Enbridge "prefers" a convenient southern route to Superior.

Melodee Monicken

P.S. I hope it's clear from my letter that I don't trust the collaborative PUC/Enbridge environmental analysis. Like many others, I want an EIS on this route.

From: [melodee.monicken](#)
To: [Hartman, Larry \(COMM\)](#)
Subject: Re: Question
Date: Monday, June 02, 2014 3:53:26 PM
Attachments: [pastedGraphic_5.pdf](#)
[pastedGraphic_6.pdf](#)
[pastedGraphic_7.pdf](#)
[pastedGraphic_8.pdf](#)
[pastedGraphic_9.pdf](#)
[pastedGraphic_10.pdf](#)
[pastedGraphic_11.pdf](#)
[pastedGraphic_12.pdf](#)

In response to your question, Larry: There should be 9 map attachments. What I sent is below. Should I send it in two parts?

Thank you.

Melodee

REGARDING THE ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC SANDPIPER PIPELINE PROJECT

PUC DOCKET NO. PL9/PPL-13-474. CERTIFICATE OF ROUTE APPLICATION

Melodee Monicken
17456 Half Moon Road
Park Rapids, MN 56470
May 30, 2014

Mr. Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us

Dear Mr. Hartman,

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I do not believe this pipeline (not to mention the recently announced Enbridge plans to include the Line 3 rebuild in the same proposed corridor) is at all beneficial to the long-term economic and environmental health of Hubbard County, adjacent counties and the Minnesota lake country in general. Four pipelines already exist along the west side of the county and 7 pipelines cross the northern corner of Hubbard County. These pipelines have leaked in the past. Adding two more pipelines of the dimensions Enbridge and NDPC are wanting is too dangerous to Minnesota's lake country and Hubbard County's water assets. A few of my observations and objections:

1. The Enbridge safety record is so bad that this document was published in the Federal Register on May 6, 2014. It's a report from the Pipeline and Hazardous Materials Safety Administration regarding the massive Enbridge oil accident in Michigan.

PHMSA is issuing an advisory bulletin to inform all pipeline owners and operators of the deficiencies identified in Enbridge's integrity management (IM) program that contributed to the release of hazardous liquid near Marshall, Michigan, on July 25, 2010. Pipeline owners and operators are encouraged to review their own IM programs for similar deficiencies and to take corrective action. Operators should also consider training their control room staff as teams to recognize and respond to emergencies or unexpected conditions. Further, the advisory encourages operators to evaluate their leak detection capabilities to ensure adequate leak detection coverage during transient operations and assess the performance of their leak detection systems following a product release to identify and implement improvements as appropriate. Additionally, operators are encouraged to review the effectiveness of their public awareness programs and whether local emergency response teams are adequately prepared to identify and respond to early indications of ruptures. Finally, this advisory reminds all pipeline owners and operators to review National Transportation Safety Board recommendations following accident investigations. Owners and operators should evaluate and implement recommendations that are applicable to their programs.

<https://www.federalregister.gov/articles/2014/05/06/2014-10248/pipeline-safety-lessons-learned-from-the-release-at-marshall-michigan>

2. Enbridge is probably fooling with the numbers. In addition to the damning PHMSA report cited above, this surrebuttal was recently filed on the PUC's e-docket in the Alberta Clipper issue. <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId=%7B27AC7BA9-161B-48F3-AC8D-3226E663080D%7D&documentTitle=20144-97966-05>

3. Pipelines fail. Over the course of their 25-30 year life spans, most pipelines have some spill or leak "incidents," and some of those incidents have terrible consequences for our land and water. This is an EPA study about pipelines on Bristol Bay, heavy on the science and possibly bewildering to the layperson. http://www.epa.gov/ncea/pdfs/bristolbay/bristol_bay_assessment_final_2014_vol1_chapter11.pdf
From Page 5, Chapter 11:

This overall estimate of annual failure probability, coupled with the 113-km length of each pipeline as it runs along the transportation corridor within the Kvichak River watershed, results in an 11% probability of a failure in each of the four pipelines each year. Thus, the probability of a pipeline failure occurring over the duration of the Pebble 2.0 scenario (i.e., approximately 25 years) would be 95% for each pipeline. The expected number of failures in each pipeline would be about 2.2, 2.8, and 8.6 over the life of the mine in the Pebble 0.25, 2.0, and 6.5 scenarios, respectively. The chance of a large rupture in each of the three pipelines over the life of the mine would exceed 25%, 30%, and 67% in the Pebble 0.25, 2.0, and 6.5 scenarios, respectively. In each of the three scenarios, there would be a greater than 99.9% chance that at least one of the three pipelines carrying liquid would fail during the project lifetime. Bristol Bay Assessment 11-5 January 2011 Chapter 11 Pipeline Failures

But even those of us who don't have a science degree can understand the EPA's summary of pipeline failures risk in the Environmental Impact Statement: "In each of the three scenarios, there would be a greater than 99.9% chance that at least one of the three pipelines carrying liquid would fail during the project lifetime."

A retired MPCA tech advisor, now working with Friends of the Headwaters, described the EPA's EIS, cited above, in this way: "Suffice it to say the EIS concluded that these pipelines are virtually guaranteed to leak or rupture multiple times over a thirty year life time and most of these will be used longer than that. We just don't know when or where or how much; it is like Russian roulette with all the chambers loaded, we just don't know which way the gun will be pointed when it goes off."

Another of technical advisor characterizes the EPA findings this way: The EPA's predictions around pipeline failure probability can be summed up in this statement: one incident (leak/spill/rupture) per every 30 miles of pipeline during each pipeline's lifespan (25-30 years). Obviously, there might be 5 incidents in one 30-mile segment, but he is looking at averages.

4. This is a seriously flawed approval process. The PUC has become a permit mill. Their modest CEA is not overseen by the MPCA or the DNR, the state agencies charged with protecting Minnesota's environment. Maybe that's why 22 pages of DNR commentary about the issues on the Alberta Clipper were dismissed with "The DNR commented"?

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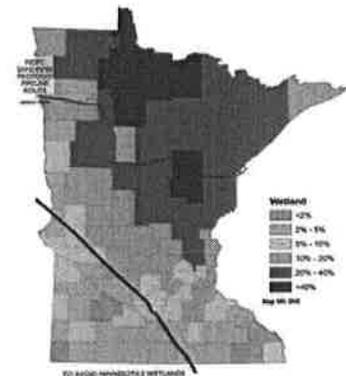
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From: melodee.monicken
To: Hartman, Larry (COMM)
Subject: Part 2 of 2
Date: Monday, June 02, 2014 3:56:49 PM
Attachments: [pastedGraphic_7.pdf](#)
[pastedGraphic_8.pdf](#)
[pastedGraphic_9.pdf](#)
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From: [melodee_monicken](#)
To: [Hartman, Larry \(COMM\)](#)
Subject: in two parts
Date: Monday, June 02, 2014 3:55:12 PM
Attachments: [pastedGraphic_5.pdf](#)
[pastedGraphic_6.pdf](#)

REGARDING THE ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC SANDPIPER PIPELINE PROJECT

PUC DOCKET NO. PL9/PPL-13-474. CERTIFICATE OF ROUTE APPLICATION

Melodee Monicken
17456 Half Moon Road
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May 30, 2014

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Email: larry.hartman@state.mn.us

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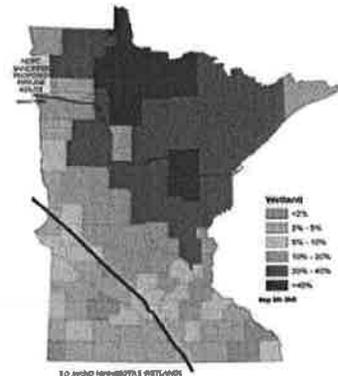
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PUC DOCKET NO. PL9/PPL-13-474. CERTIFICATE OF ROUTE APPLICATION

Melodee Monicken
17456 Half Moon Road
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April 4, 2014

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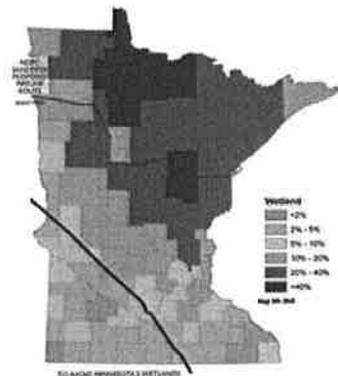
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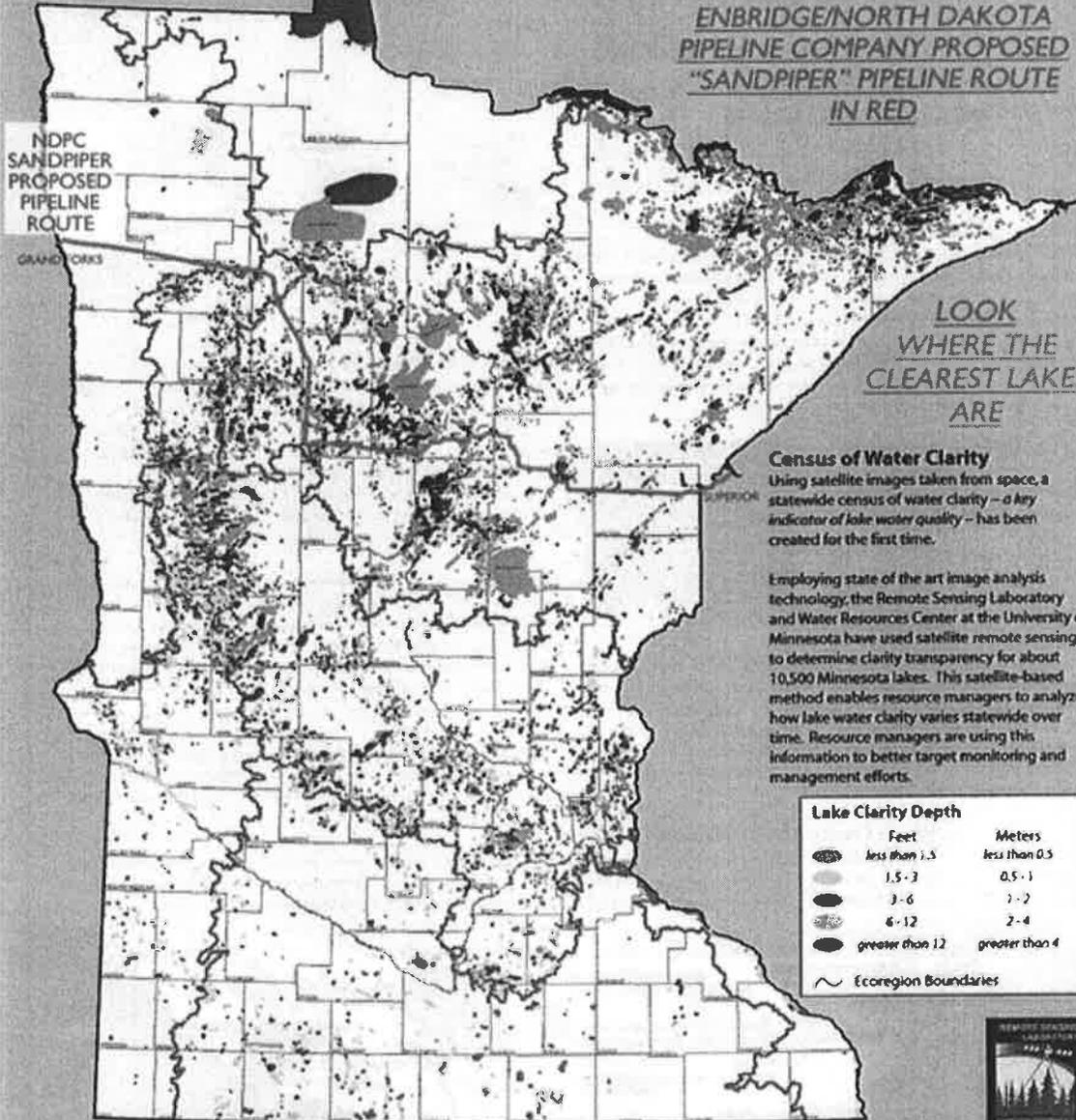
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Park Rapids, MN 56470

Minnesota Lakes

ENBRIDGE/NORTH DAKOTA
PIPELINE COMPANY PROPOSED
"SANDPIPER" PIPELINE ROUTE
IN RED



Prepared by Friends of the Headwaters
P.O. Box 565
Park Rapids, MN 56470

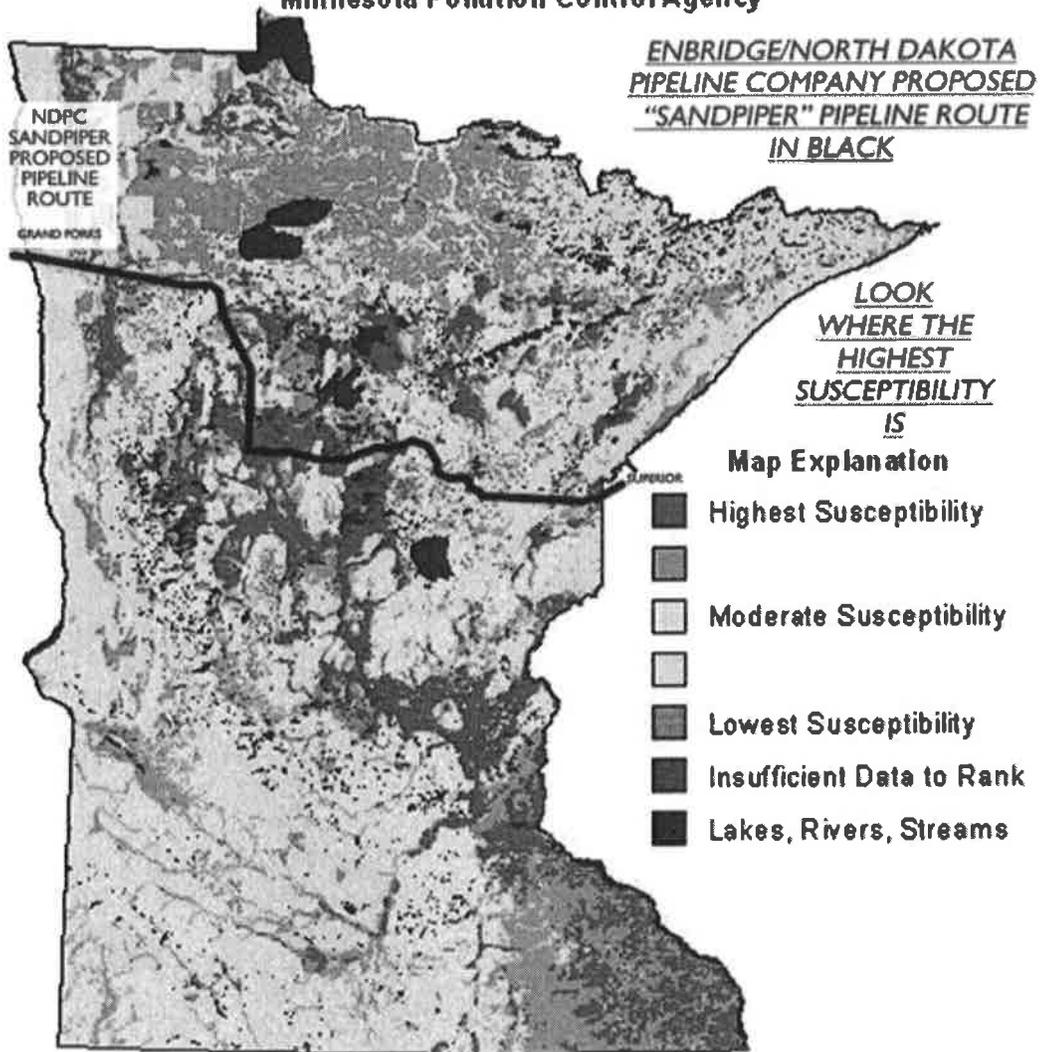
mnfriendsoftheheadwaters@gmail.com
<https://www.facebook.com/savemississippiheadwaters>
<https://www.friendsoftheheadwaters.org>



MN Lakes map from Water Resources Center, UoM

Ground Water Contamination Susceptibility in Minnesota

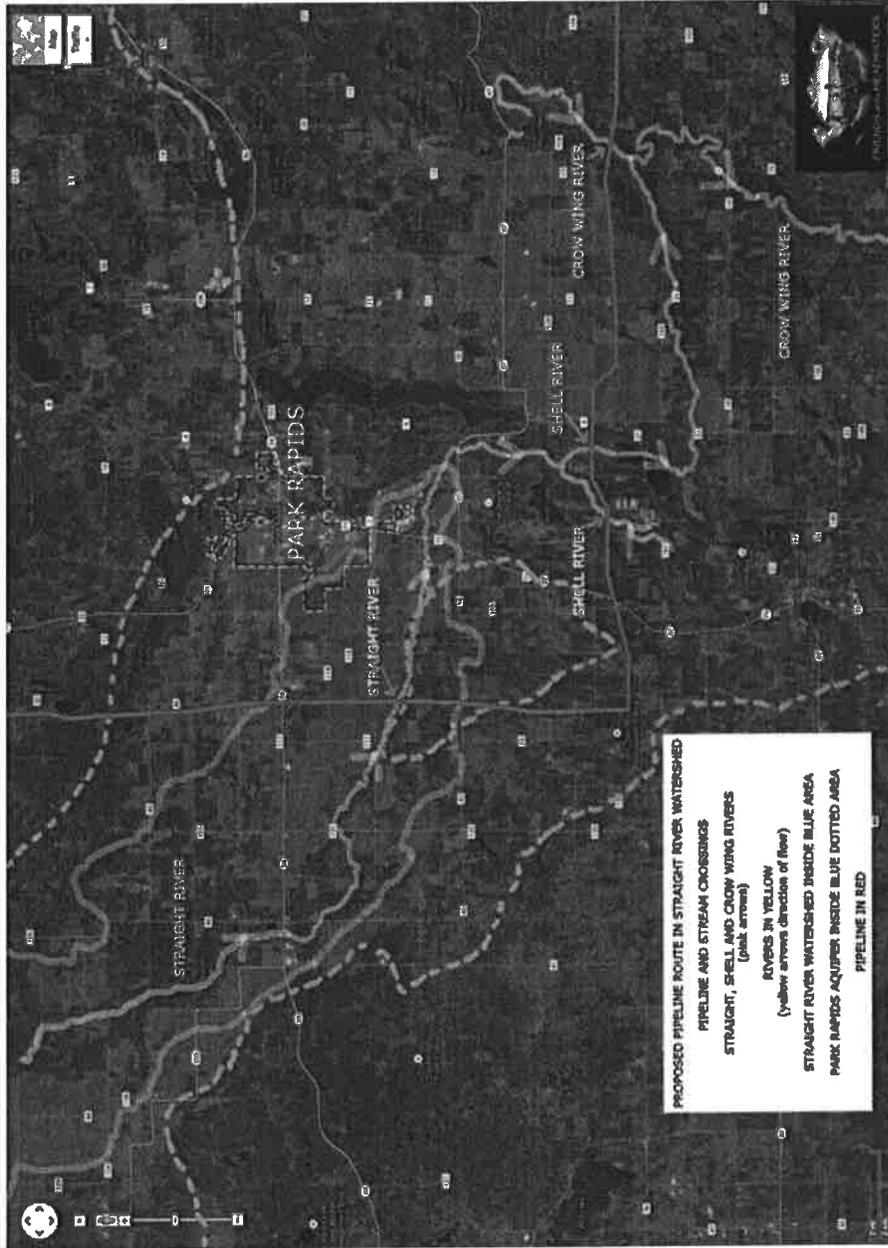
Minnesota Pollution Control Agency



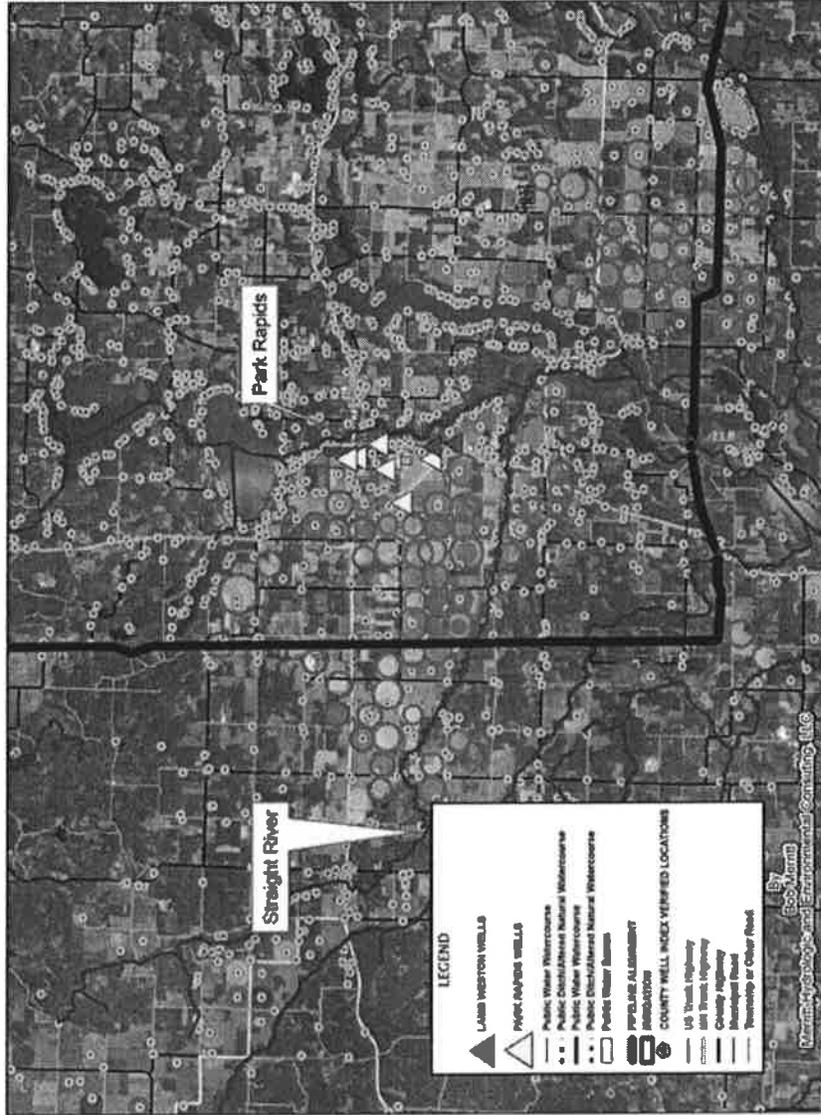
Prepared by Friends of the Headwaters

www.friendsoftheheadwaters.org

MN map from MPCA



**Sandpiper Pipeline Park Rapids Area
2010 Aerial Photo**



Park Rapids

Straight River

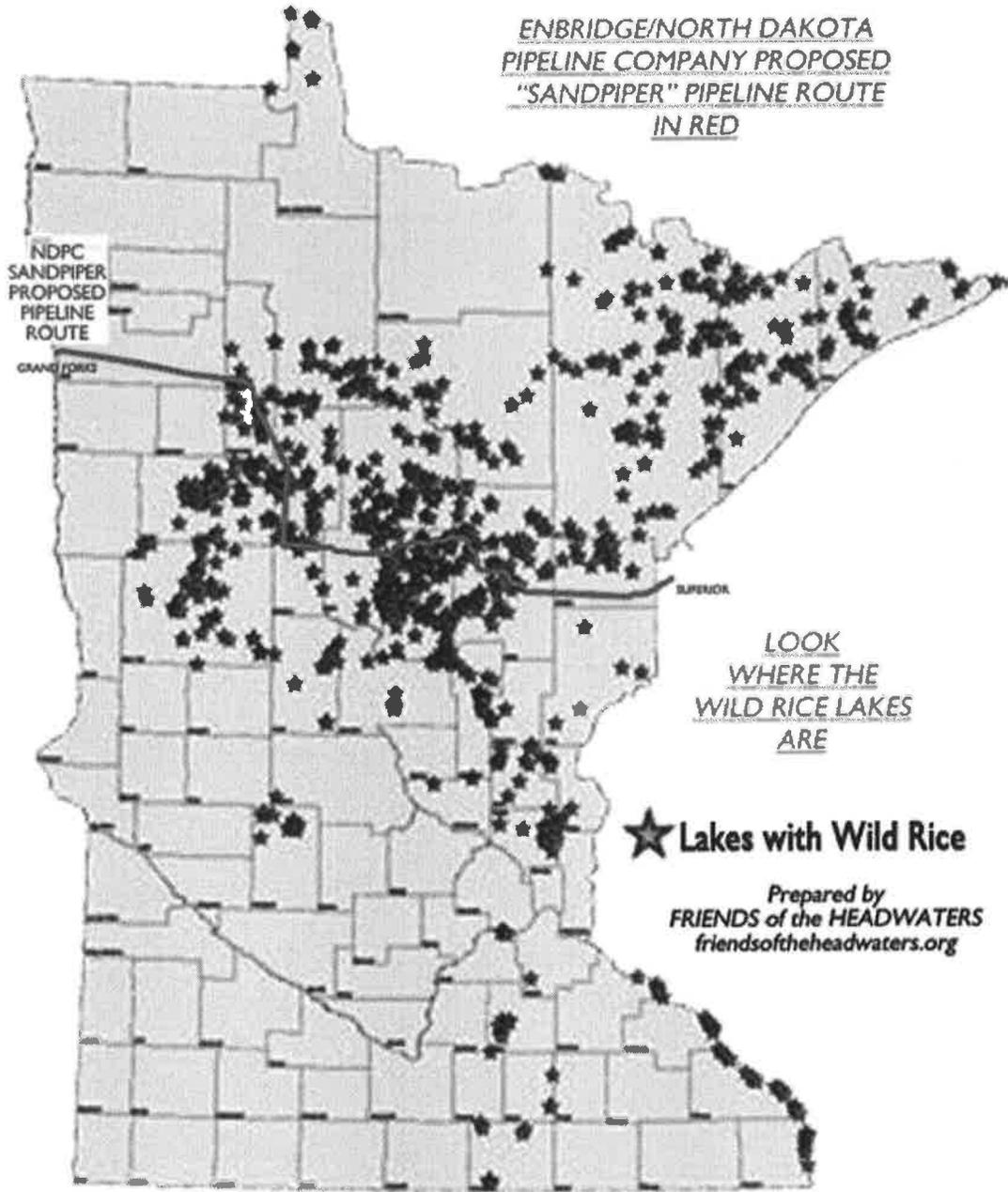
LEGEND

- LAMB WELSPON WELLS
- PAPER MILLS WELLS
- Public Water Watersource
- Public Discharged Natural Watersource
- Public Water Watersource
- Public Discharged Natural Watersource
- Public Water Basin
- PUBLIC WATER ALLOCATION
- COUNTY WELL INDEX VERIFIED LOCATIONS
- WELLS
- US 76/4th Highway
- 3rd Street Highway
- County Highway
- Municipal Road
- Township or Other Road



By
Bob Mann
Mann, Johnson, and Associates, Inc.

ENBRIDGE/NORTH DAKOTA
PIPELINE COMPANY PROPOSED
"SANDPIPER" PIPELINE ROUTE
IN RED



NDPC
SANDPIPER
PROPOSED
PIPELINE
ROUTE

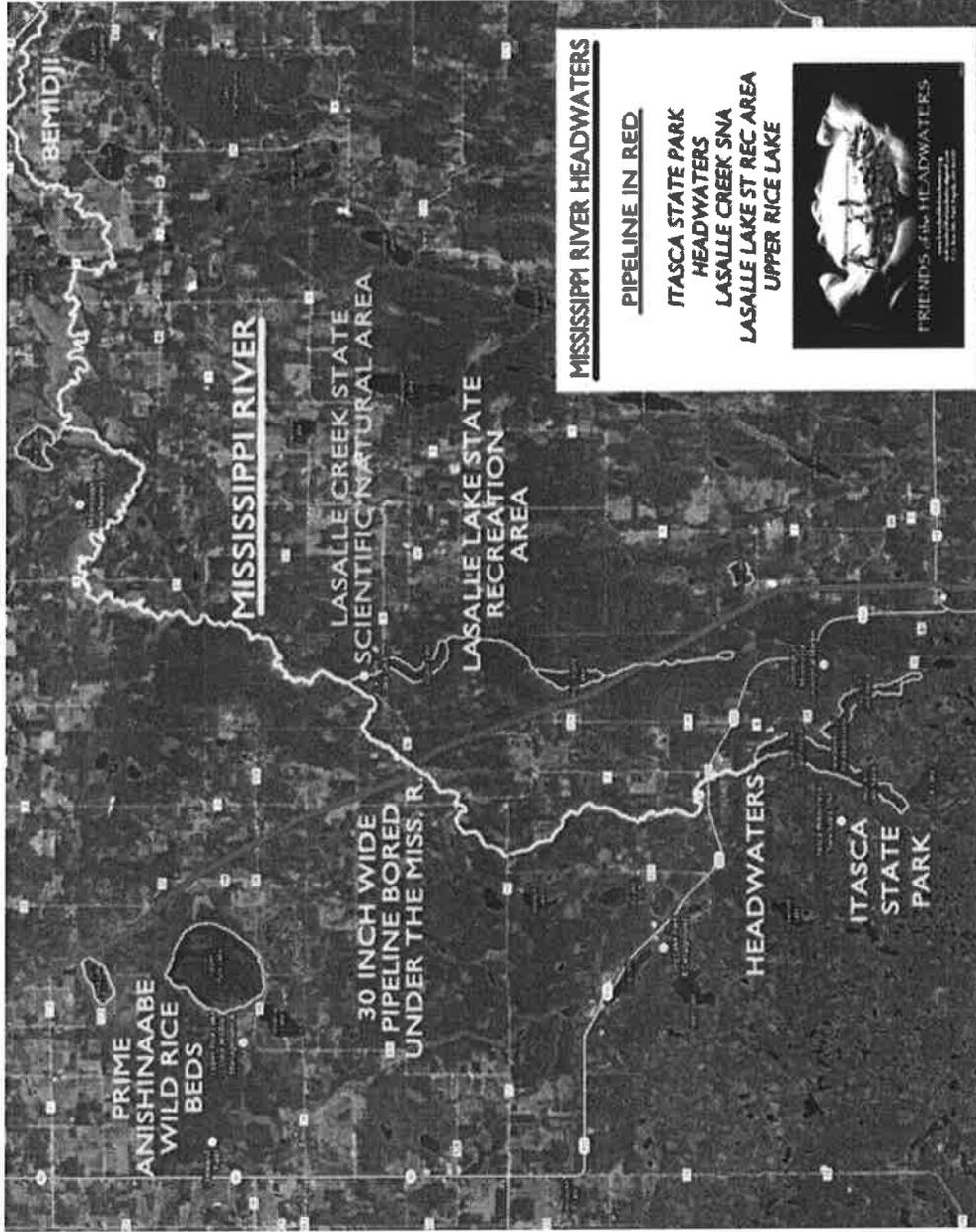
GRAND FORKS

LOOK
WHERE THE
WILD RICE LAKES
ARE

★ Lakes with Wild Rice

Prepared by
FRIENDS of the HEADWATERS
friendsoftheheadwaters.org



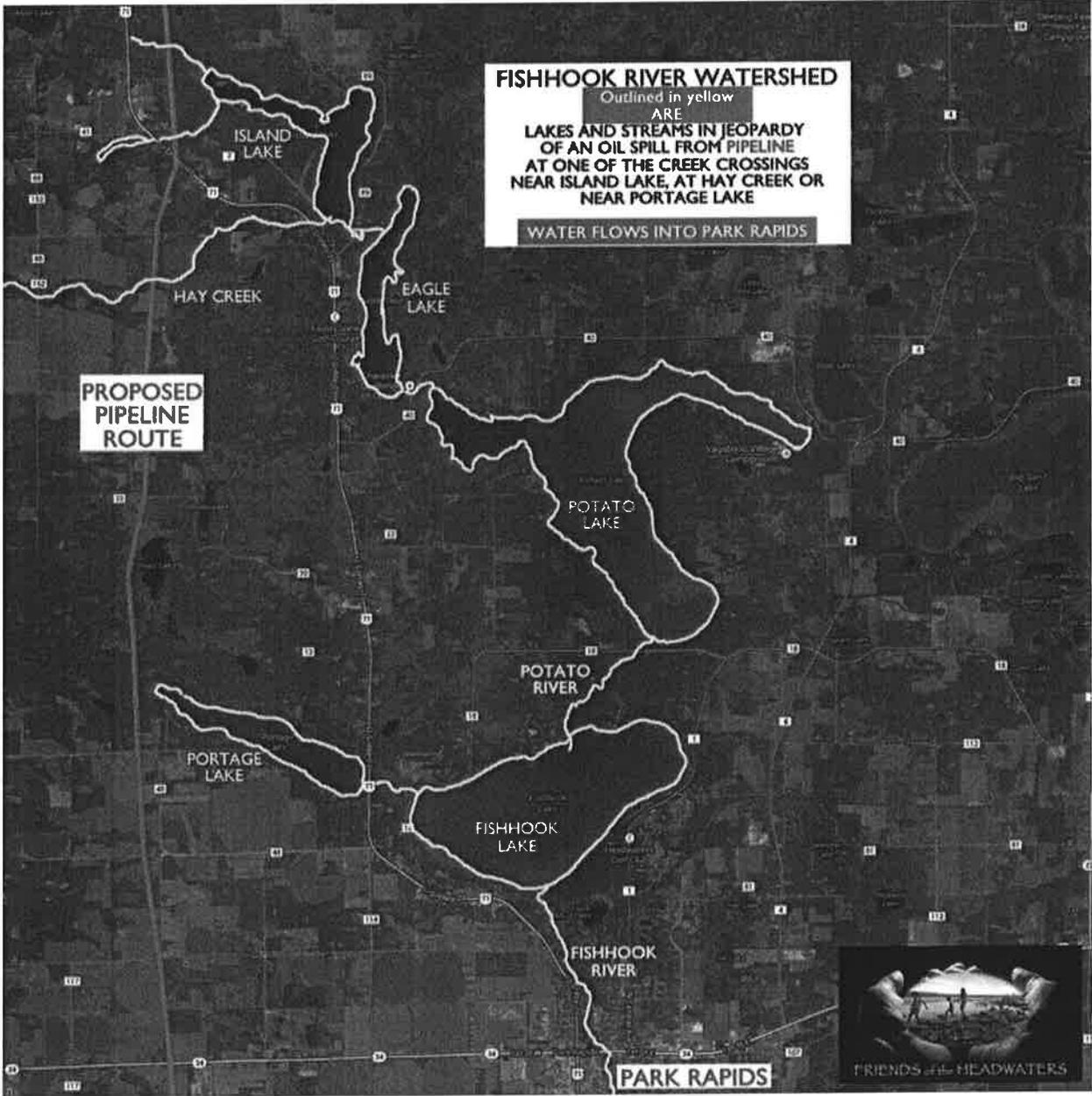


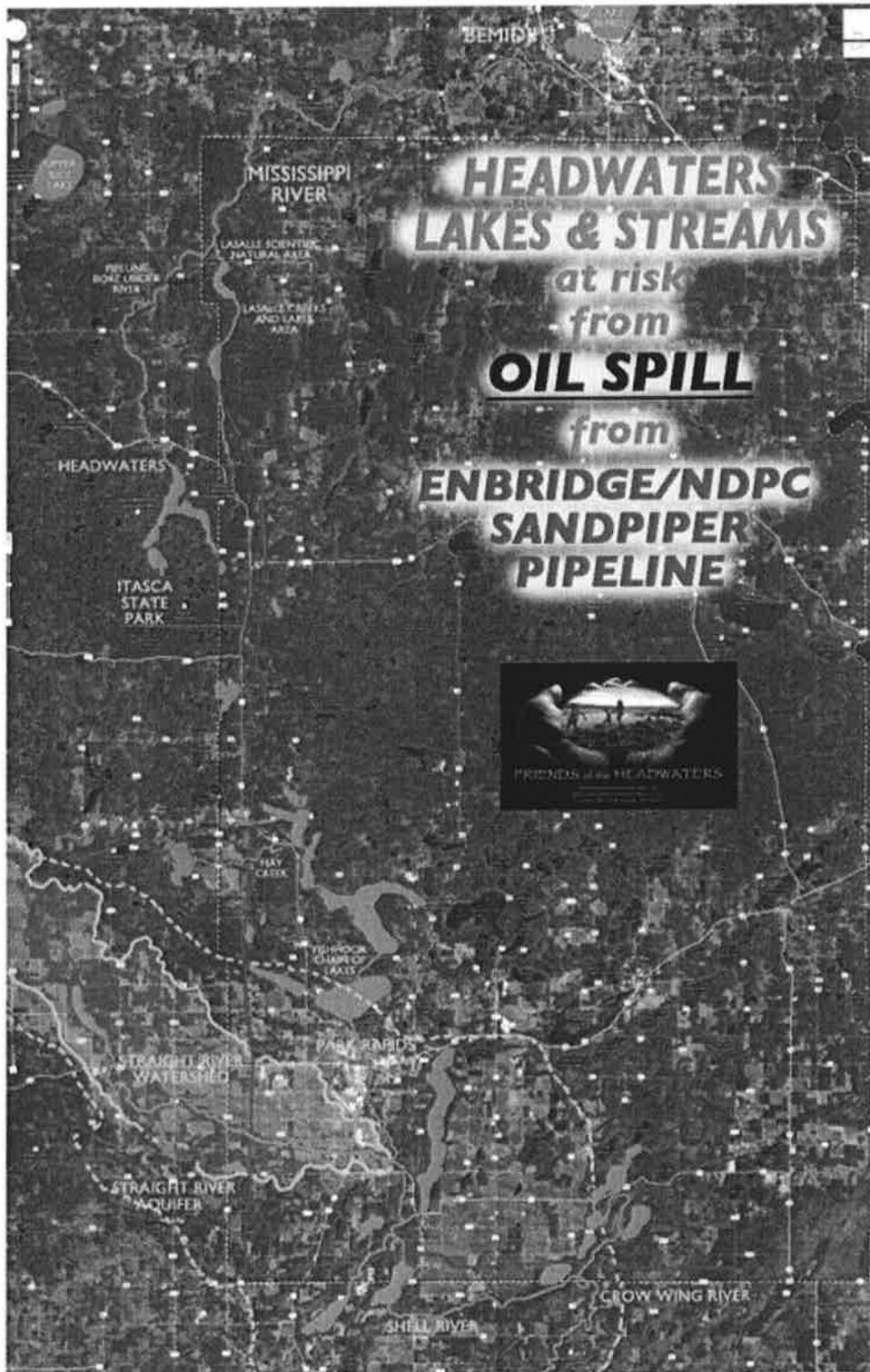
MISSISSIPPI RIVER HEADWATERS

PIPELINE IN RED

- ITASCA STATE PARK HEADWATERS
- LASALLE CREEK SNA
- LASALLE LAKE ST REC AREA
- UPPER RICE LAKE







BEMIDJI

HEADWATERS LAKES & STREAMS

at risk
from

OIL SPILL

from

ENBRIDGE/NDPC SANDPIPER PIPELINE



FRIENDS OF THE HEADWATERS

MISSISSIPPI
RIVER

LASALLE SCIENTIFIC
NATURAL AREA

LASALLE CREEK
AND LAKE
AREA

PRELIM
BONE LINDER
RIVER

HEADWATERS

ITASCA
STATE
PARK

HAY
CREEK

THORNTON
CHAMBER OF
COMMERCE

PARK RAPIDS

STRAIGHT RIVER
WATERSHED

STRAIGHT RIVER
AQUIFER

SHELL RIVER

CROW WING RIVER

From: Vicki Murphey
To: Hartman, Larry (COMM)
Subject: Pipeline
Date: Friday, May 30, 2014 11:08:40 PM

Dear Sir,

Please do a EIS done on the pipeline that is being placed north of Outing MN. This could impact the natural springs in that area that feeds in Lake Roosevelt and eventually to the Mississippi. I am in favor of the pipeline but would like its placement around that area studied.

Thank you,
Vicki Murphey

Sent from my iPhone

From: [rh.smith](#)
To: [Hartman, Larry \(COMM\)](#)
Subject: Revised supplemental documents
Date: Friday, May 30, 2014 9:26:13 PM
Attachments: [FOH Supplemental 5-30 low res.pdf](#)

Larry,

First, thank you for taking the time this morning to meet with us. The discussion and additional clarifications about this whole process are most appreciated.

I also want to thank you for extending me some additional time to revise the Supplemental documents provided you this morning. You will find attached my additions and revisions to my earlier comments.

Thank you again for your patience with this. Traffic was thick departing the Cities. Finally got home to Park Rapids at 5.

I will also send you a higher resolution file of the attached in a separate email.

Richard Smith
Friends of the Headwaters



May 29, 2014

Mr. Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Dear Mr. Hartman,

Regarding Public Utilities Commission (PUC) Docket No. PL9/PPL-13-474:

Please find attached our supplemental comments to be added to our position paper dated April 2, 2014 concerning the Enbridge/North Dakota Pipeline Company, LLC Sandpiper pipeline request for a proposed southern corridor route across northern Minnesota from Grand Forks, ND to Superior, WI.

The Friends of the Headwaters oppose this current projected route. You, the DOC and the Public Utility Commissioners will find further reasoning for our opposition and our proposal for an alternate route in the attached documents.

Friends of the Headwaters requests these documents be posted to the eDocket website as soon as possible.

Writing for the members of Friends of the Headwaters I thank you for your attention to these documents and for your attention to our concerns for the welfare and quality of our lands, waters and lives in the Headwaters Country.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Smith".

Richard Smith
President
Friends of the Headwaters

P.O. Box 583, Park Rapids, MN 56470
mnfriendsoftheheadwaters@gmail.com
facebook.com/savemississippiheadwaters
www.friendsoftheheadwaters.org

**SUPPLEMENTAL COMMENTS TO POSITION PAPER DATED 4/2/2014
REGARDING THE ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC
SANDPIPER PIPELINE PROJECT**

Public Utilities Commission (PUC) Docket Number: PL-6668/PPL-13-474

May 29, 2014

Prepared by

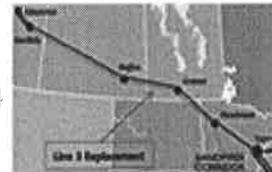
Richard Smith
Friends of the Headwaters
P.O. Box 583
Park Rapids, MN 56470

TO REVIEW:

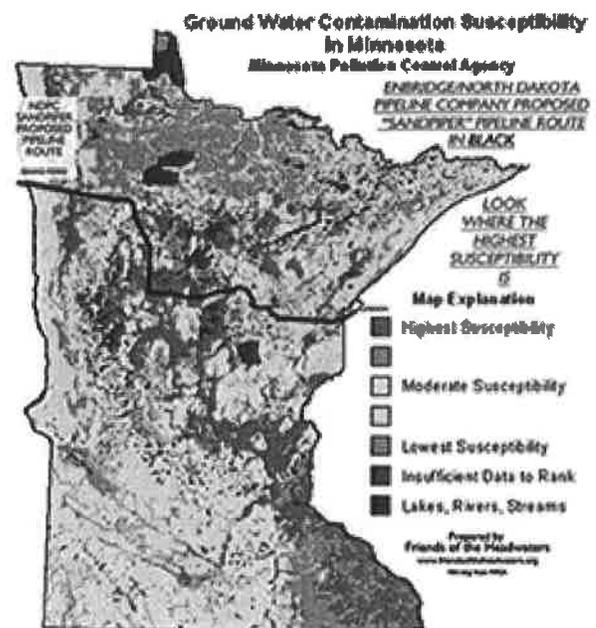
Friends of the Headwaters opposes the Enbridge/NDPC Sandpiper pipeline as currently projected to cross Minnesota's lake country from Grand Forks, ND to Superior, WI.

We believe Enbridge/NDPC's proposed "southern corridor" will NOT protect the high quality waters and other natural resources along this route.

Friends of the Headwaters also believes Enbridge intends to proliferate another multiple pipeline corridor with their southern route proposal. Enbridge presented just that in an investor conference held April 2, 2014 in New York City.



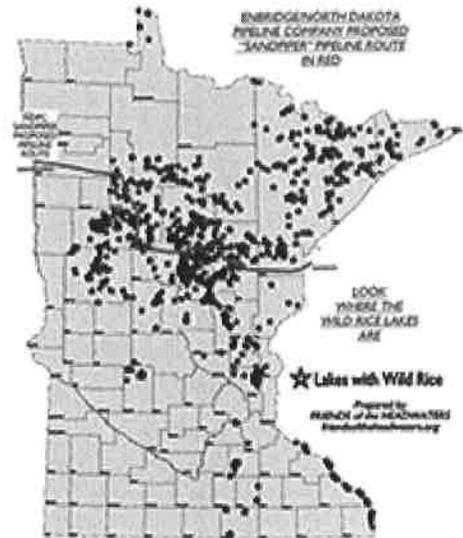
We believe Enbridge/NDPC could not have chosen a worse route as evidenced by the maps below.



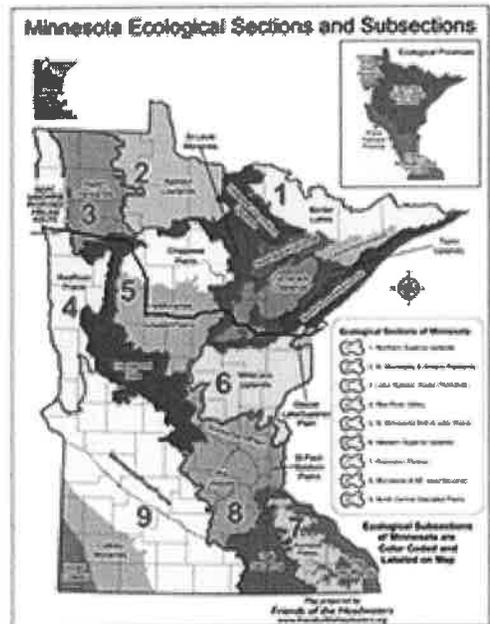
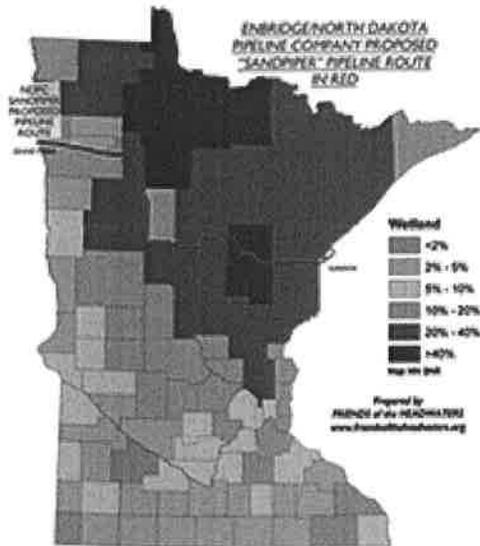
AT RISK: MINNESOTA'S

- CLEAREST AND CLEANEST LAKES
- GROUND WATER AQUIFERS
- WILD RICE LAKES
- WETLANDS
- MOST SENSITIVE SOILS TO SPILLS
- DIVERSITY OF VEGETATION
- SENSITIVE ECOLOGICAL ZONES
- THE LAKE SUPERIOR BASIN
- HIGH VALUE RECREATIONAL AND RESIDENTIAL WATERS

\$342 million annual revenue from fishing
 \$4.3 billion annual retail sales hunting, fishing, wildlife watching
 \$2 billion water-influenced properties in Hubbard County alone.



ENBRIDGE/NDPC COULD NOT HAVE PICKED A WORSE ROUTE.



Class V Sensitivity

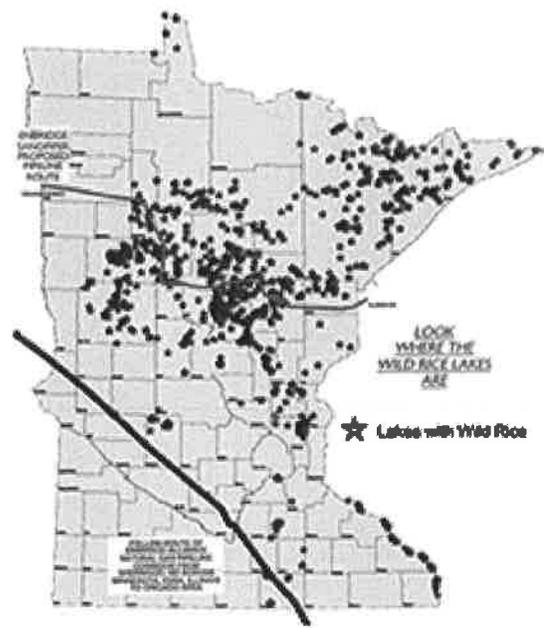
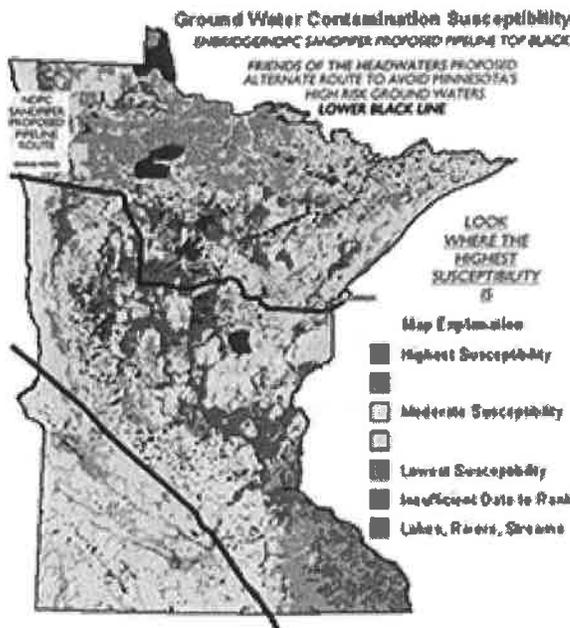
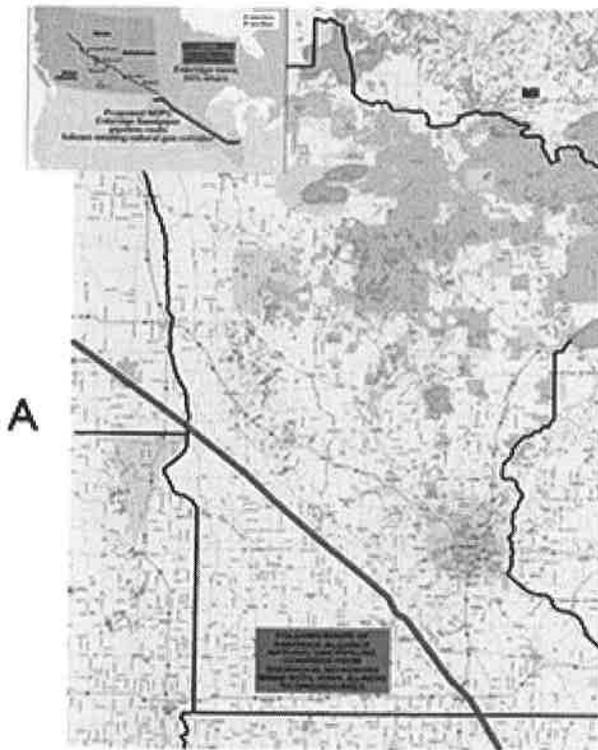


Given the high risk factors of Enbridge/NDPC's proposed Sandpiper 'southern corridor' route **FRIENDS of the HEADWATERS** has proposed a true 'southern corridor' across Minnesota which eliminates the potential for spills and damage to the state's most environmentally sensitive lands and waters.

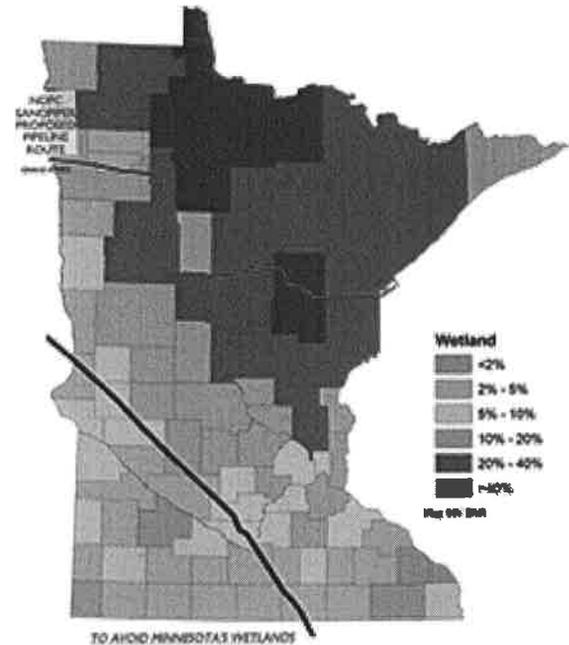
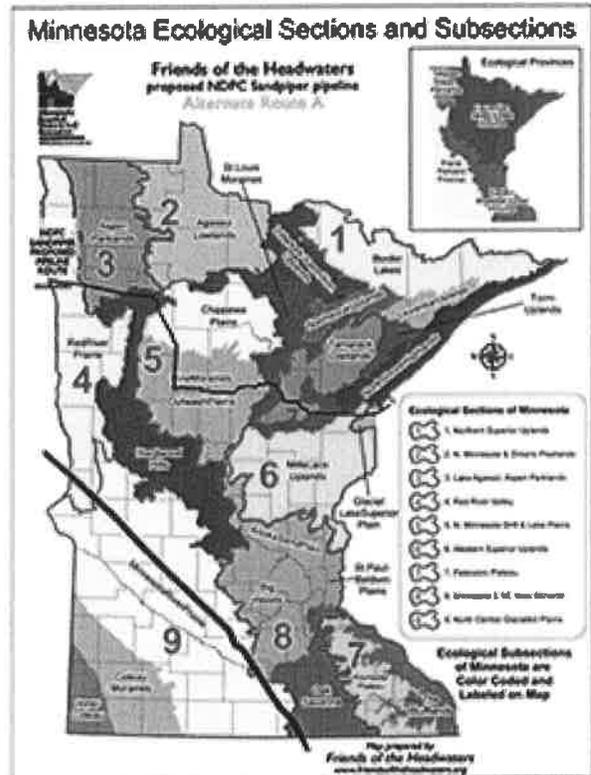
FRIENDS of the HEADWATERS Alternate Route A utilizes an existing energy corridor of which Enbridge is a 50% shareholder with Alliance Company of Canada. This corridor originates in Canada and ends west of Chicago. The proposed Enbridge/NDPC pipeline route would intersect this corridor east of Minot, ND at which point NDPC would turn and follow the corridor to Illinois.

Alternate Route A below.

Compare the route risk factors in following maps.



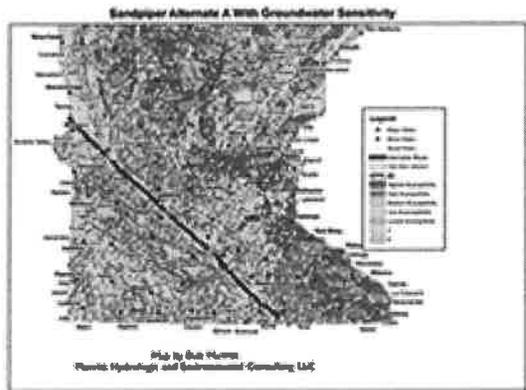
Route map comparisons continued:



ALT ROUTE A traverses almost exclusively agricultural lands below Minnesota's primary lake country. This area is sparsely populated with mostly small towns among the farmlands.

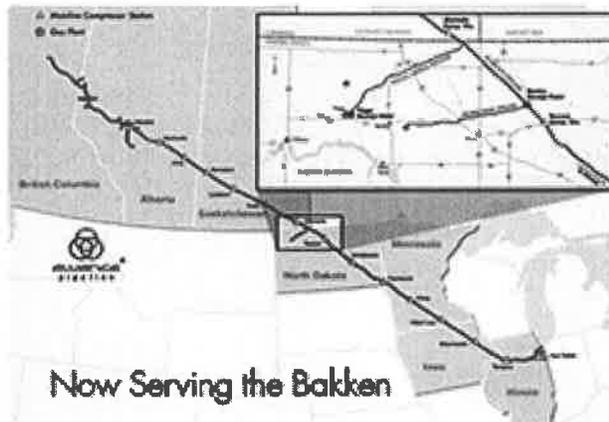
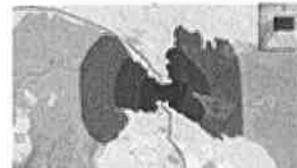
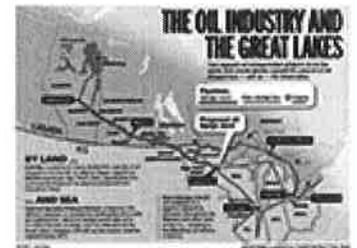
Note: Enbridge's Mark Curwin, Senior Director for Strategic Coordination of Major Project Executions in the US, stated their construction preference is to build pipelines across farmland. He made these remarks at a public meeting in Park Rapids on Jan. 29, 2014. Mr. Curwin gave the reasons of better soils, easier construction, easier access, less natural habitat destruction, cheaper and quicker. After construction the farmland can be put back into crop production. Access to leaks and spills is much easier. Winter wetland construction would be at a minimum.

Two additional maps by Bob Merritt, hydrologist, showing Alternate Route A in better detail.



Minnesota still gets to keep jobs the construction will provide as well as North Dakota plus Iowa and Illinois.

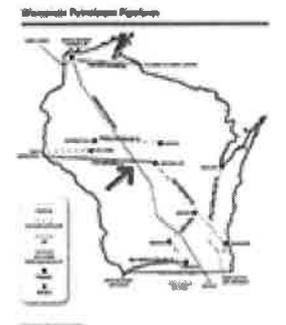
Although the route does not end in Superior, it still ties into the existing Enbridge system in Illinois with routing options to Michigan and Ontario that avoid our greatest freshwater lakes of Lake Superior and the Mackinac Straits of Lakes Michigan and Huron.



Since it's an existing corridor the company should have access to the mapping previously done for the pipeline already there. ALT ROUTE A also intersects pipelines in southern Minnesota owned and operated by other companies which provide the option of re-routing Bakken crude to the refineries in Rosemont and Saint Paul Park in the south Twin Cities Metro.

The Illinois Hub also allows Enbridge access to its pipelines to Oklahoma and points south.

Now Serving the Bakken



The *FRIENDS of the HEADWATERS* disputes Enbridge/NDPC's contention that the Sandpiper must end in Superior, Wisconsin. Enbridge has provided no rationale for the route ending in Superior other than "We want it. It connects to our existing system in Superior." The Alternate Route A proposed by *FRIENDS of the HEADWATERS* also connects to their existing system hub near Chicago, Illinois. It does not prevent Enbridge from then transporting the Bakken crude either south to Oklahoma and the Gulf Coast nor across Illinois, Indiana, Michigan and across the border to Sarnia, Ontario, Canada on their existing system.

Figure 7853.0510-2
Pipeline System Map



Alternate Route A already fits into their existing pipeline corridor system as evidenced by the map at right. Alternate Route A also appears to be a more direct route from the North Dakota Bakken Oil Fields to the primary energy markets of the US Midwest.

Friends of the Headwaters believes the citizens of Minnesota have the right to determine the route parameters of this pipeline corridor, not Enbridge/NDPC. The considerations of the Sandpiper pipeline and the Line 3 Rebuild proposed to run alongside the Sandpiper should not be dictated to the citizens of Minnesota by the company. The company already has too many pipelines crossing Minnesota's most valuable waters and lands.

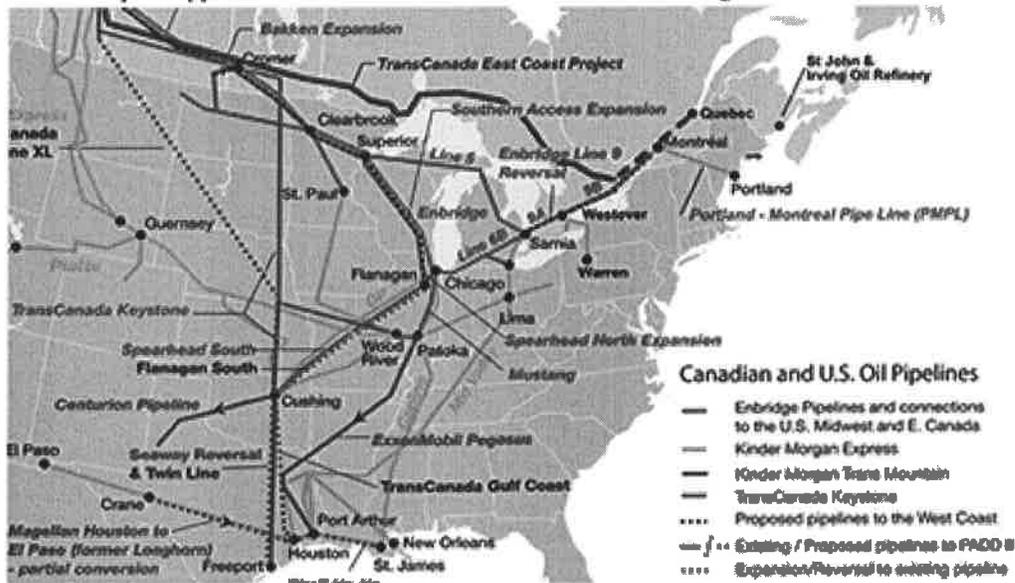
The cumulative risk of adding additional lines to this region is too high to have the routing parameters set by what Enbridge 'wants'. They should not be allowed to frame the debate on this issue. The citizens of Minnesota and this state's governing and regulatory agencies need to reject this framing by Enbridge/NDPC



and reframe the discussion regarding the need and route of the proposed Sandpiper pipeline as what is beneficial to Minnesota, its people, its communities and its natural resources. Until Enbridge/NDPC adequately provides a detailed explanation for demanding why the Sandpiper pipeline must end in Superior, Wisconsin, Friends of the Headwaters believes all alternative routes must be given full consideration, even those proposing a system overhaul of how and where Enbridge wants to cross the state.

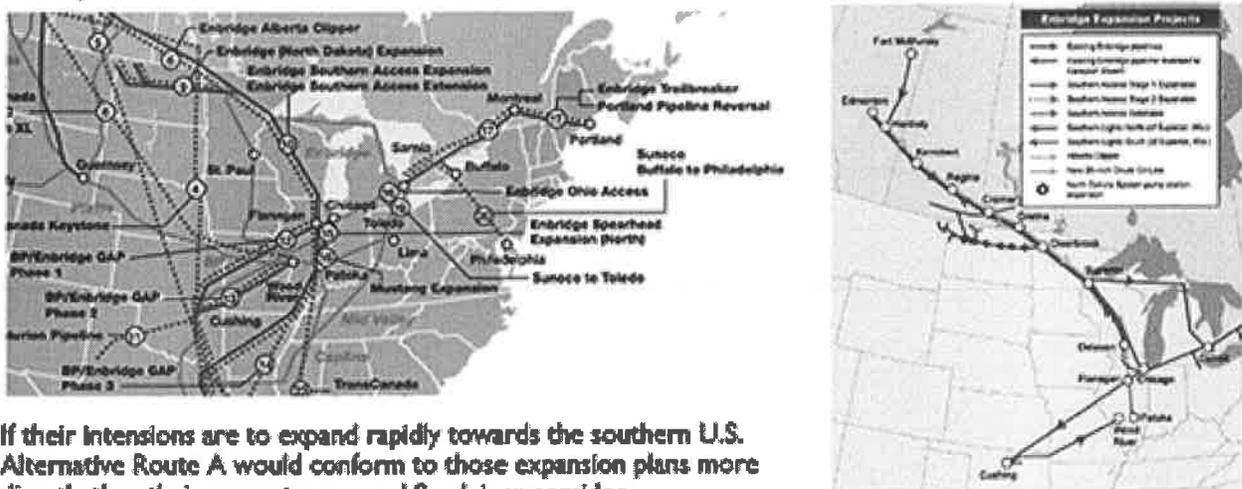
If Enbridge/NDPC were truly committed to protecting our lakes, rivers, wetlands, aquifers and lands as they publically state they are, then prove it by not just giving Minnesotans statistics about how safe their pipelines are (their history says otherwise), but by actually moving their proposed route to the lowest risk part of the state as portrayed on the previously presented illustrated maps.

Costs should not be a factor. After all, once the Sandpiper is constructed, 375,000 barrels of oil will pass through it daily. At the current world price for a barrel of oil that amounts to \$40 million dollars per day or \$14.6 billion dollars annually. Even though Enbridge is charging a fee to move the amount of oil, it should not take too many years to recoup their construction costs. Plus it appears from the map below the company has plans to expand the pipeline system through Wisconsin. The money allocated for that extension could easily be applied to the extra construction costs of building Alternate Route A.



Since the company is adamant about Superior as a destination for the Bakken crude, perhaps this proposed extension in Wisconsin could be used to move the oil from the end of Alternate Route A back north to Superior.

Enbridge has ambitious expansion plans not just in Minnesota but nationally it appears.



If their intentions are to expand rapidly towards the southern U.S. Alternate Route A would conform to those expansion plans more directly than their current proposed Sandpiper corridor.

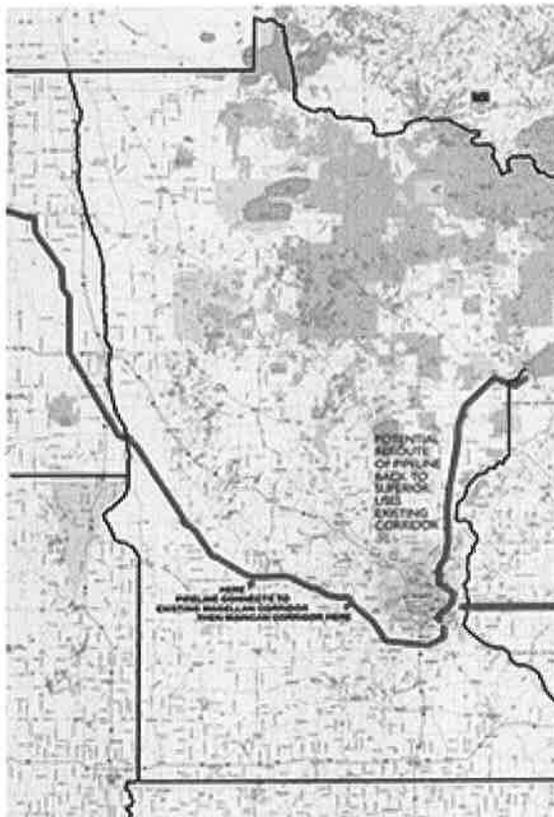
The *FRIENDS of the HEADWATERS* also sponsors other alternate routes at this time.

These routes can be connected back to Superior along existing energy corridors.

ALTERNATE ROUTE "C" as previously proposed in Position Paper of 4/2/2014

West of Grand Forks near Larimore the Sandpiper would turn south following either railroad easements or road easements south-southeast down the Red River Valley, crossing the Red River near Wahpeton, ND and continuing along MN Hgy 9 until it intersects an existing pipeline corridor owned by the Magellan Company. The Sandpiper follows this corridor until its intersection with the MinnCan pipeline corridor at which point it follows this corridor to the Flint Hills and Saint Paul Park refineries and pipeline system southeast of the Twin Cities Metro area. Optionally the route could turn south from Enbridge/NOPC's proposed pumping station near Lakota, ND.

Route C bypasses Minnesota's sensitive lands and waters and gives Enbridge the option of two routes back to Superior. They can use an existing pipeline corridor along I35 to Duluth whereupon they would intersect their northern corridor and can turn east to Superior. Or they can use another existing pipeline corridor, the Magellan straight east into Wisconsin where that line intersects the Enbridge system in central Wisconsin. At that point Enbridge can use their proposed expansion line to move the oil back to Superior or down to Illinois.



MAP APPENDIX

Wisconsin Petroleum Pipelines



Friends of the Headwaters does question how excited the people of Wisconsin might be about new pipelines.

Pipeline builder to pay forfeiture
 (Enbridge Energy Partners agreed to pay \$11 million to settle claims that the company violated environmental regulations in connection with the construction of an oil pipeline spanning Wisconsin.)

Source: Chicago Tribune

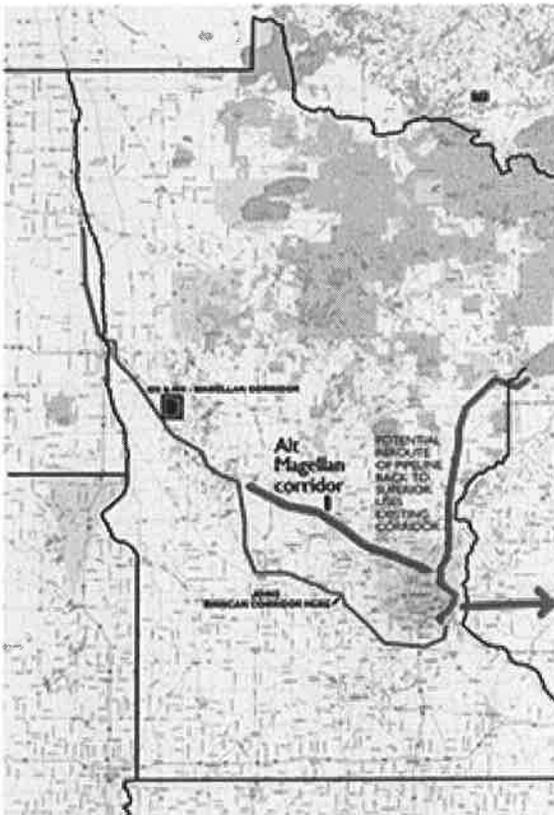
The *FRIENDS of the HEADWATERS* also sponsors other alternate routes at this time.

These routes can be connected back to Superior along existing energy corridors.

ALTERNATE ROUTE "D" as previously proposed in Position Paper of 4/2/2014

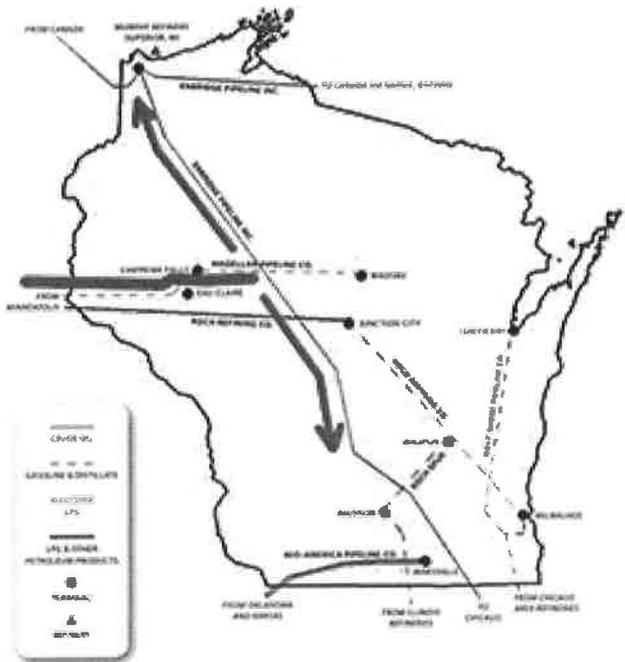
Near Grand Forks the Sandpiper would turn south following an existing pipeline corridor along Interstate 29 south towards Fargo, North Dakota then follow the same corridor east southeast adjacent Interstate 94. This existing pipeline corridor is owned by the Magellan Company, the same company which has the line continuing east from Minneapolis-StPaul into Wisconsin to intersect Enbridge's existing corridor there. The Sandpiper follows this corridor until its intersection with the MinnCan pipeline corridor at which point it follows this corridor to the Flint Hills and Saint Paul Park refineries and pipeline system southeast of the Twin Cities Metro area.

Route D bypasses most of Minnesota's sensitive lands and waters and gives Enbridge the option of two routes back to Superior. They can use an existing pipeline corridor along 135 to Duluth whereupon they would intersect their northern corridor and can turn east to Superior. Or they can use another existing pipeline corridor, the Magellan straight east into Wisconsin where that line intersects the Enbridge system in central Wisconsin. At that point Enbridge can use their proposed expansion line to move the oil back to Superior or down to Illinois.



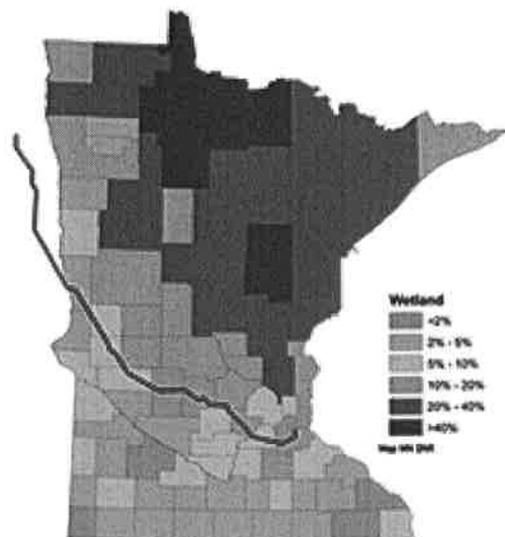
Route D could also stay in the Magellan corridor along 194 and continue on into Wisconsin.

Wisconsin Petroleum Pipelines

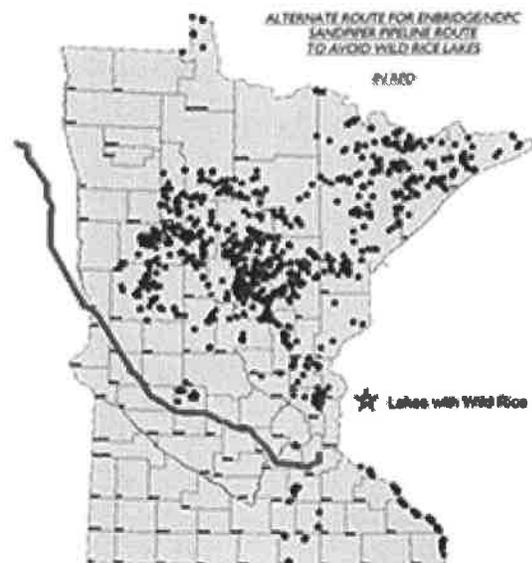
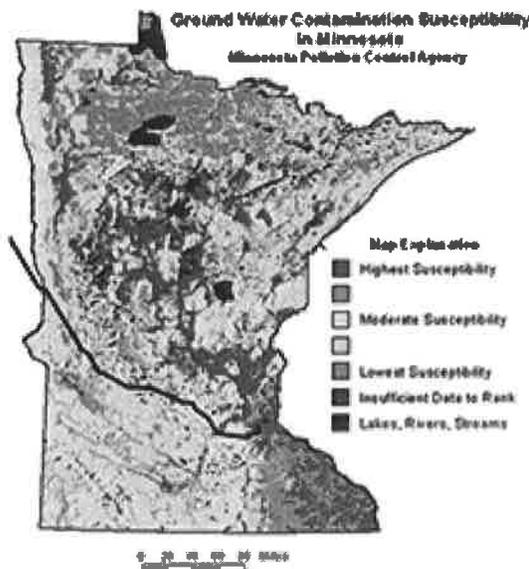


Source: Wisconsin Office of Energy Administration. WISCONSIN ENERGY SERVICES 2010 © 2011

Although these alternate routes avoid the high risk environmental lands and waters of the state as exhibited in the maps below, they do traverse areas of higher population near the Twin Cities. This route does allow a connection along existing pipeline corridors into western and central Wisconsin to Enbridge's pipeline system in Wisconsin. Enbridge has option to ship oil north back to Superior, WI or south to Chicago hub.



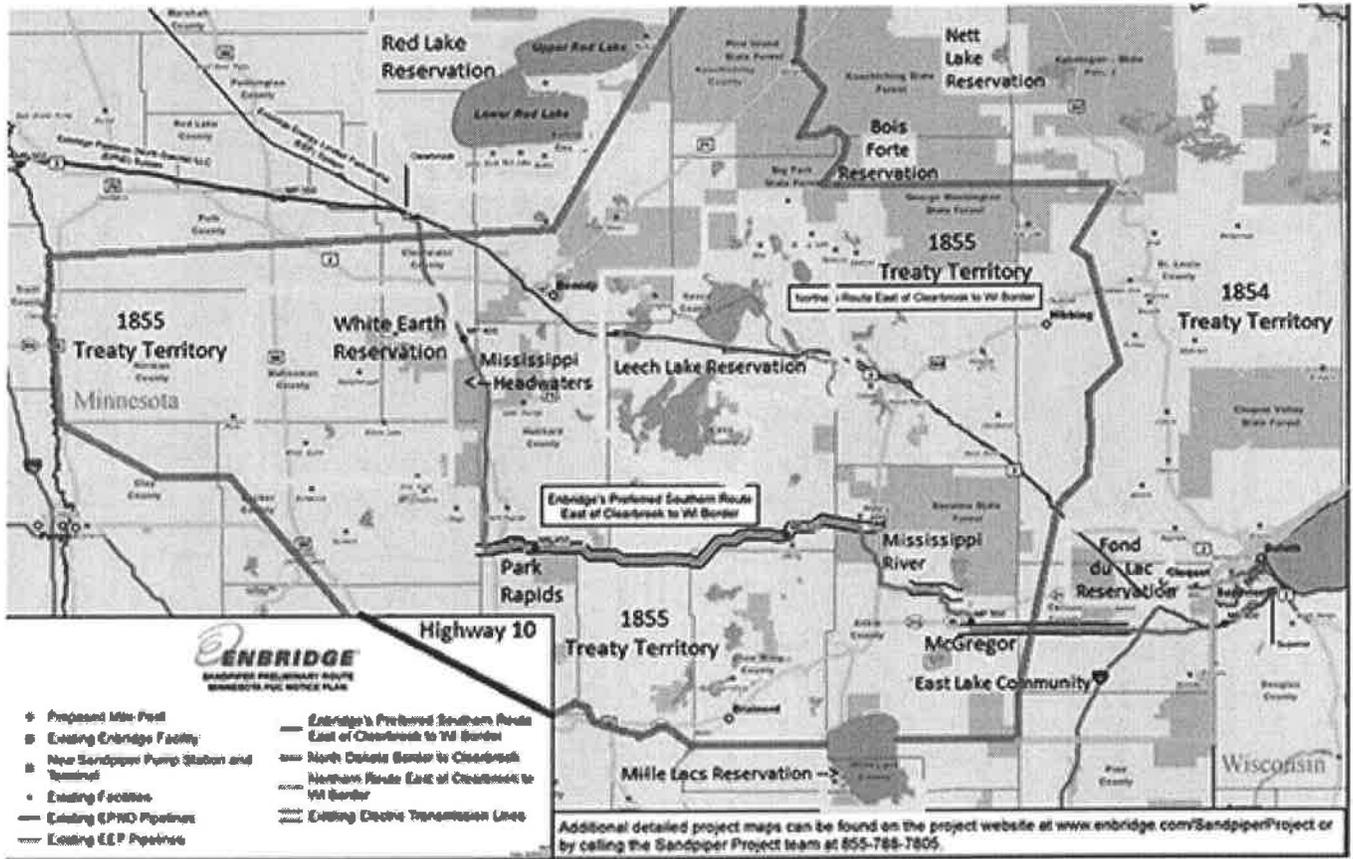
TO AVOID PRIMITIVE WETLANDS



As currently planned with the exception of a few tax dollars and short term construction monies Minnesotans derive no long term benefits from these pipelines and assume all the risks from leaks/spills/ruptures. And eventually these pipelines will leak or break. Enbridge's spill history in Minnesota proves it true.

Friends of the Headwaters therefore recommends to the PUC, DOC and other state agencies that they enforce our MEPA statutes and deny the Certificate of Route permit for the Enbridge/NDPC's proposed Sandpiper pipeline corridor through Minnesota's prime lake country. A perfectly viable, low risk alternative is available south of our best waters.

In summary the *FRIENDS of the HEADWATERS* opposes the Enbridge/NDPC Sandpiper Pipeline route proposal as marked on the map below. What does it say about a company that would neglect to feature the state's most famous river, the Mississippi, on their proposed route map? Perhaps this is evidence of their true concern for Minnesota's valuable and cherished water resources.



Enbridge already has too large a footprint across Minnesota's Headwaters Country.

Too much is at risk, not only with the state's clearest lakes; ground water aquifers; fish and wildlife; wild rice; lake and riverfront homes, businesses, and communities; tourism industry; lands and forests; but there's also Lake Superior.

Does Enbridge's insistence on the pipeline ending at Superior portend a future of shipping oil on the Great Lakes? Ironic that a ship icon just happens to be on the adjacent map.

The people of Minnesota should not allow a Canadian corporation with its North Dakota Pipeline Company US subsidiary to dictate the terms of this project.

The company has yet to explain the need for Superior as the end point. This proposed pipeline route should not proceed without legitimate justification. Said reasoning should not include corporate profits.

Friends of the Headwaters believes up here a barrel of water IS worth more than a barrel of oil.



From: [rh.smith](#)
To: [Hartman, Larry \(COMM\)](#)
Subject: higher res file
Date: Friday, May 30, 2014 9:27:09 PM
Attachments: [EOH Supplemental 5-30.pdf](#)



May 29, 2014

**Mr. Larry Hartman, Environmental Review Manager
Energy Environmental Review and Analysis (EERA)
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198**

Dear Mr. Hartman,

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Sincerely,

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**Richard Smith
President
Friends of the Headwaters**

**P.O. Box 583, Park Rapids, MN 56470
mnfriendsoftheheadwaters@gmail.com
facebook.com/savemississippiheadwaters
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**SUPPLEMENTAL COMMENTS TO POSITION PAPER DATED 4/2/2014
REGARDING THE ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC
SANDPIPER PIPELINE PROJECT**

Public Utilities Commission (PUC) Docket Number: PL-6668/PPL-13-474

May 29, 2014

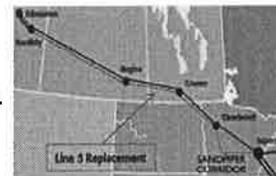
Prepared by
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Friends of the Headwaters
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Park Rapids, MN 56470

TO REVIEW:

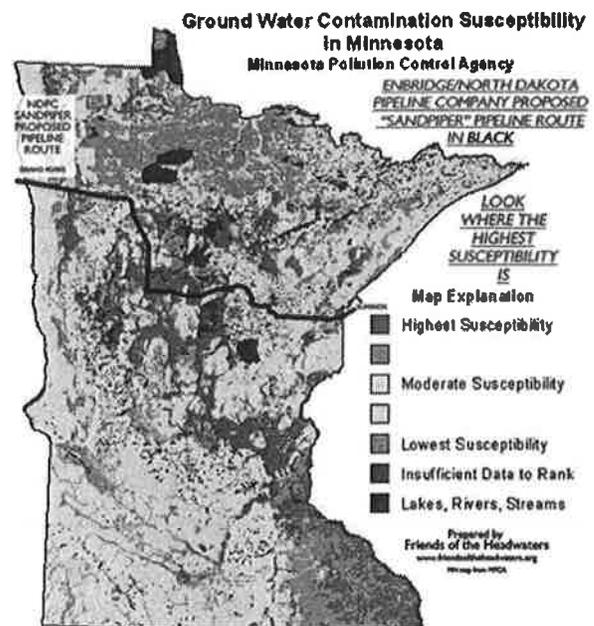
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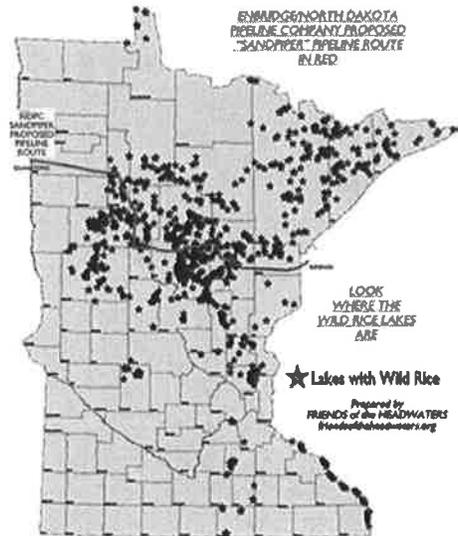
We believe Enbridge/NDPC could not have chosen a worse route as evidenced by the maps below.



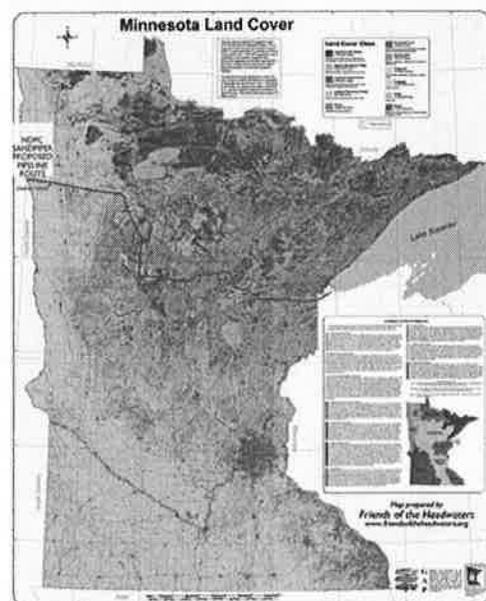
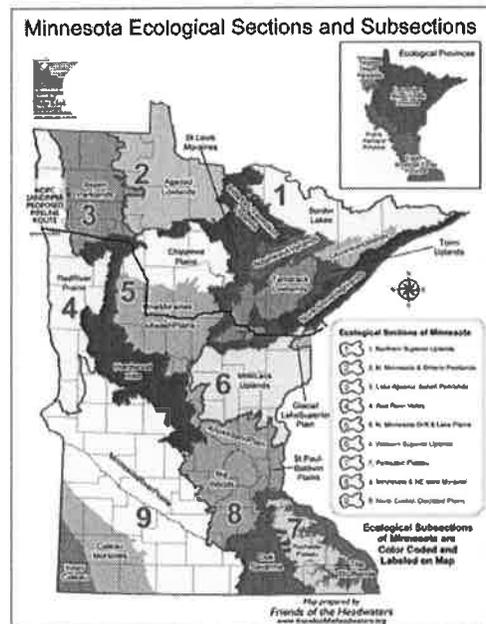
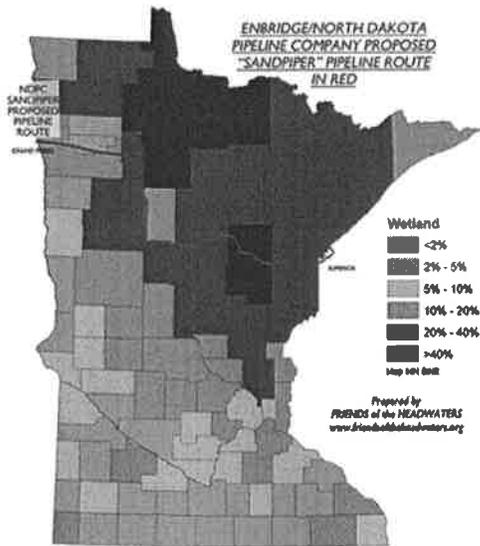
AT RISK: MINNESOTA'S

- CLEAREST AND CLEANEST LAKES
- GROUND WATER AQUIFERS
- WILD RICE LAKES
- WETLANDS
- MOST SENSITIVE SOILS TO SPILLS
- DIVERSITY OF VEGETATION
- SENSITIVE ECOLOGICAL ZONES
- THE LAKE SUPERIOR BASIN
- HIGH VALUE RECREATIONAL AND RESIDENTIAL WATERS

\$342 million annual revenue from fishing
 \$4.3 billion annual retail sales hunting, fishing, wildlife watching
 \$2 billion water-influenced properties in Hubbard County alone.



ENBRIDGE/NDPC COULD NOT HAVE PICKED A WORSE ROUTE.

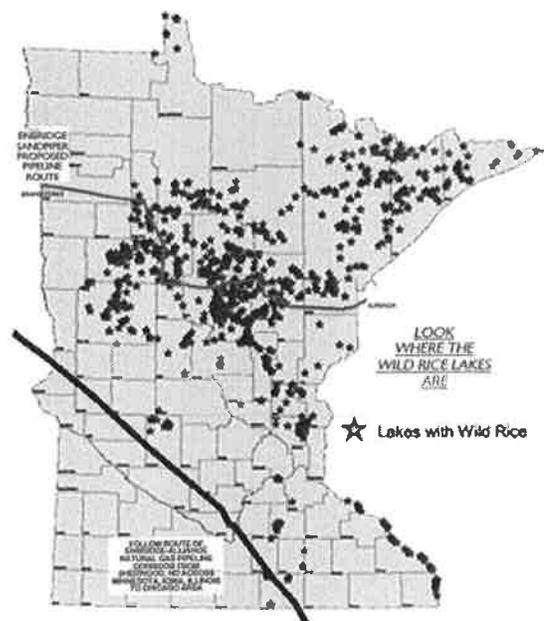
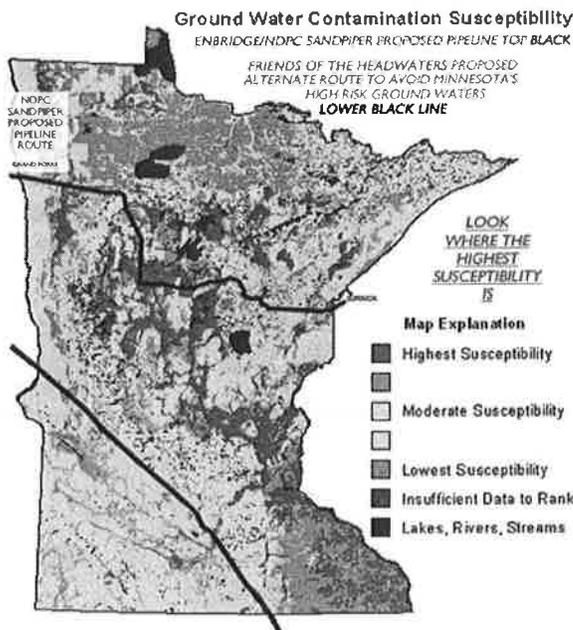
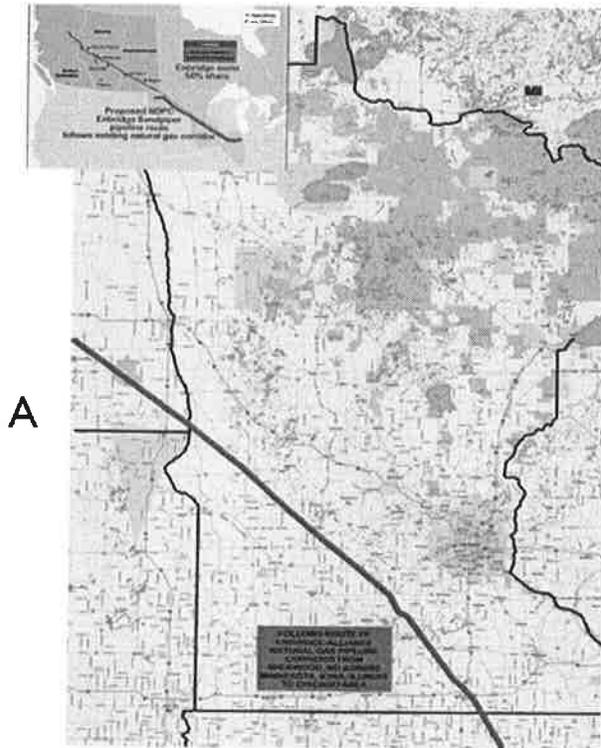


Given the high risk factors of Enbridge/NDPC's proposed Sandpiper 'southern corridor' route *FRIENDS of the HEADWATERS* has proposed a true 'southern corridor' across Minnesota which eliminates the potential for spills and damage to the state's most environmentally sensitive lands and waters.

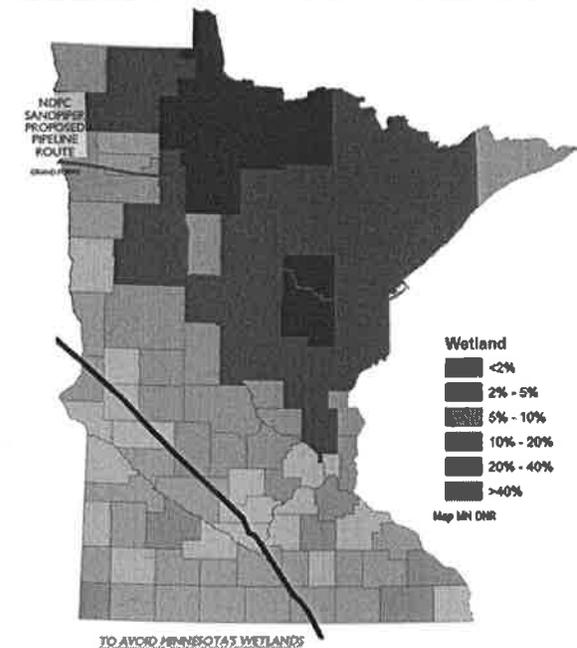
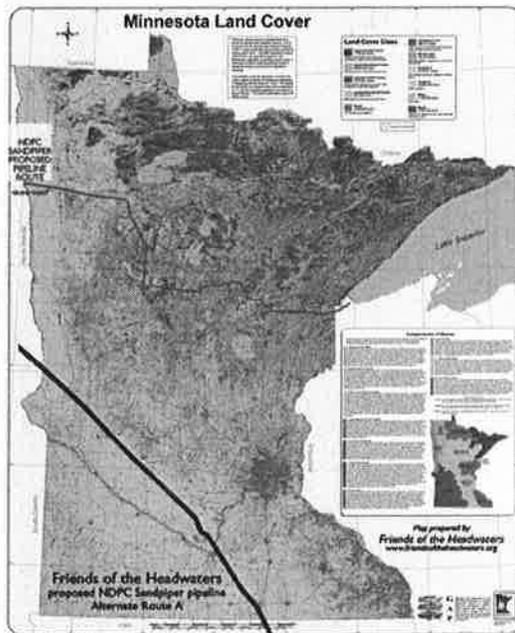
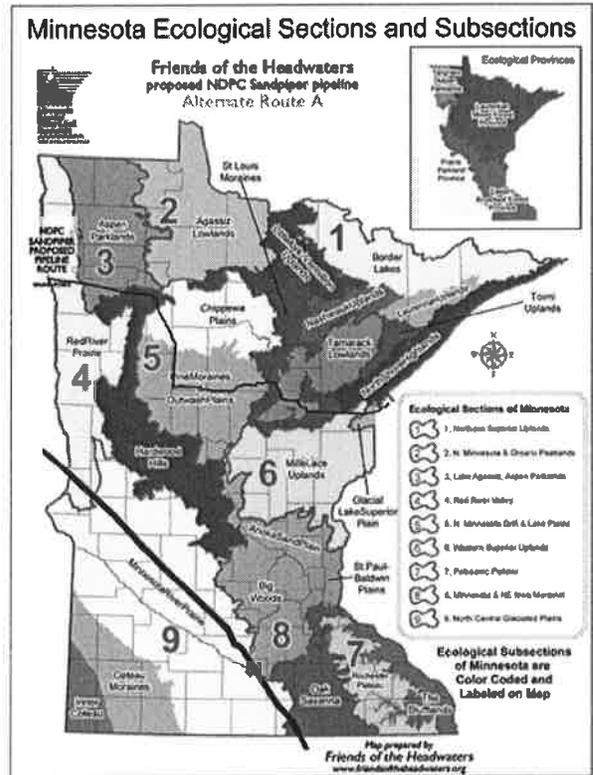
FRIENDS of the HEADWATERS Alternate Route A utilizes an existing energy corridor of which Enbridge is a 50% shareholder with Alliance Company of Canada. This corridor originates in Canada and ends west of Chicago. The proposed Enbridge/NDPC pipeline route would intersect this corridor east of Minot, ND at which point NDPC would turn and follow the corridor to Illinois.

Alternate Route A below.

Compare the route risk factors in following maps.



Route map comparisons continued:



ALT ROUTE A traverses almost exclusively agricultural lands below Minnesota's primary lake country. This area is sparsely populated with mostly small towns among the farmlands.

Note: Enbridge's Mark Curwin, Senior Director for Strategic Coordination of Major Project Executions in the US, stated their construction preference is to build pipelines across farmland. He made these remarks at a public meeting in Park Rapids on Jan. 29, 2014. Mr. Curwin gave the reasons of better soils, easier construction, easier access, less natural habitat destruction, cheaper and quicker. After construction the farmland can be put back into crop production. Access to leaks and spills is much easier. Winter wetland construction would be at a minimum.

Two additional maps by Bob Merritt, hydrologist, showing Alternate Route A in better detail.

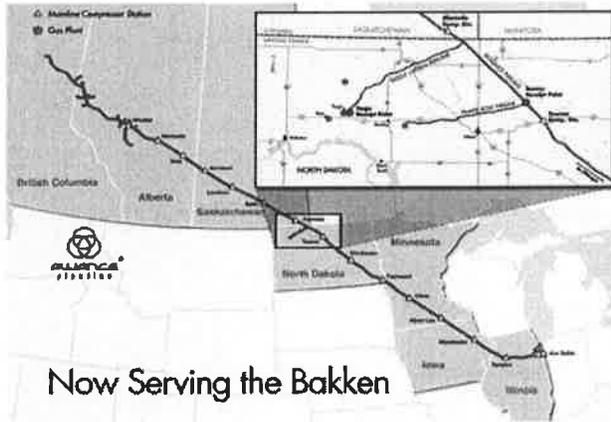


Minnesota still gets to keep jobs the construction will provide as well as North Dakota plus Iowa and Illinois.

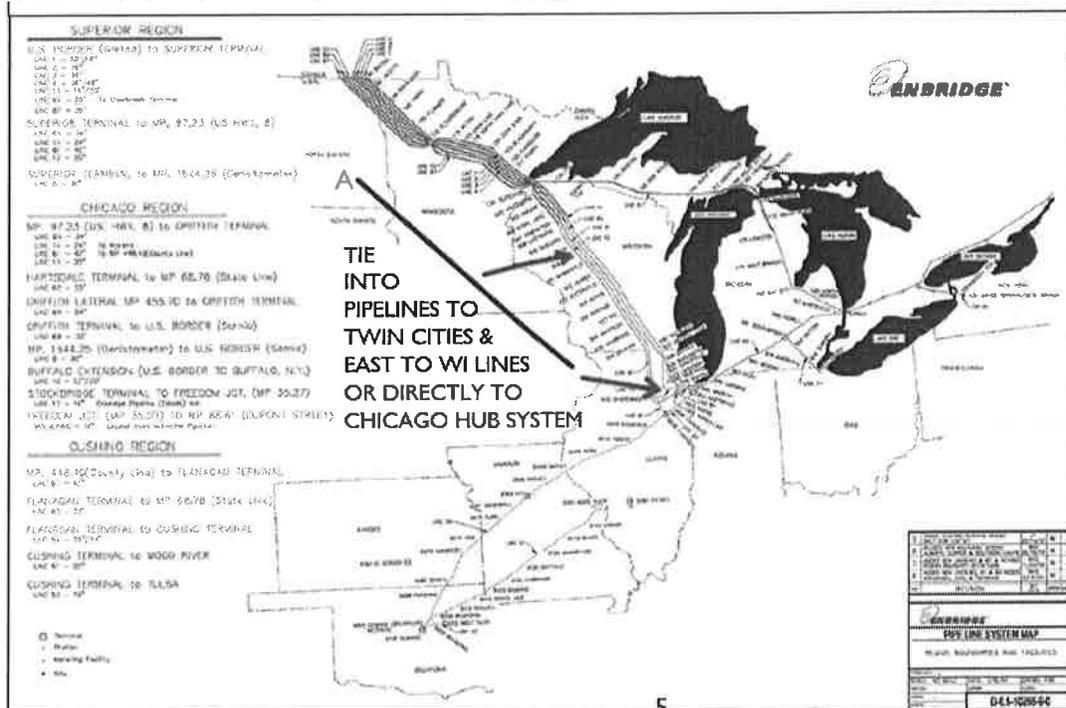
Although the route does not end in Superior, it still ties into the existing Enbridge system in Illinois with routing options to Michigan and Ontario that avoid our greatest freshwater lakes of Lake Superior and the Mackinac Straits of Lakes Michigan and Huron.



Since it's an existing corridor the company should have access to the mapping previously done for the pipeline already there. ALT ROUTE A also intersects pipelines in southern Minnesota owned and operated by other companies which provide the option of re-routing Bakken crude to the refineries in Rosemont and Saint Paul Park in the south Twin Cities Metro.

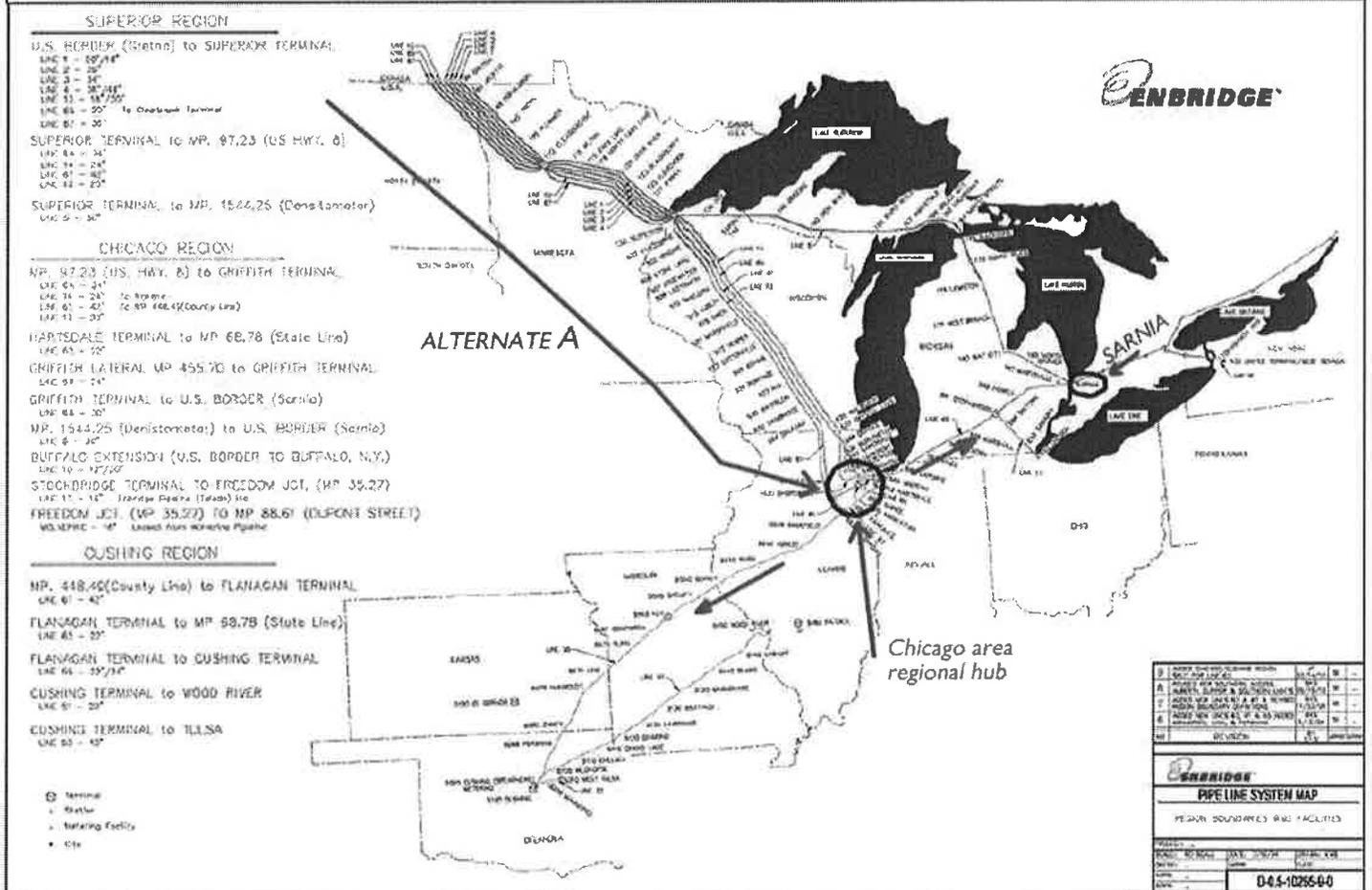


The Illinois Hub also allows Enbridge access to its pipelines to Oklahoma and points south.



The *FRIENDS of the HEADWATERS* disputes Enbridge/NDPC's contention that the Sandpiper must end in Superior, Wisconsin. Enbridge has provided no rationale for the route ending in Superior other than "We want it. It connects to our existing system in Superior." The Alternate Route A proposed by *FRIENDS of the HEADWATERS* also connects to their existing system near Chicago, Illinois. It does not prevent Enbridge from then transporting the Bakken crude either south to Oklahoma and the Gulf Coast nor across Illinois, Indiana, Michigan and across the border to Sarnia, Ontario, Canada on their existing system.

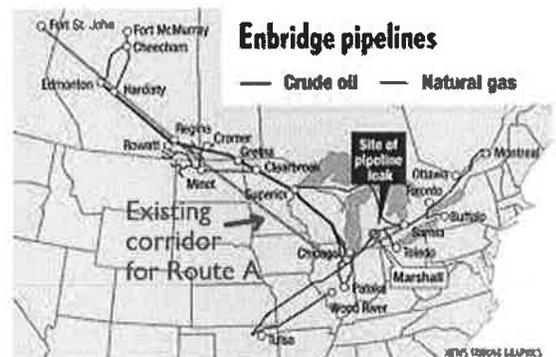
**Figure 7853.0510-2
Pipeline System Map**



Alternate Route A already fits into their existing pipeline corridor as evidenced by the map at right. Alternate Route A also appears to be a more direct route from the North Dakota Bakken Oil Fields to the primary energy markets of the US Midwest.

Friends of the Headwaters believes the citizens of Minnesota have the right to determine the route parameters of this pipeline corridor, not Enbridge/NDPC. The considerations of the Sandpiper pipeline and the Line 3 Rebuild proposed to run alongside the Sandpiper should not be dictated to the citizens of Minnesota by the company. The company already has too many pipelines crossing Minnesota's most valuable waters and lands.

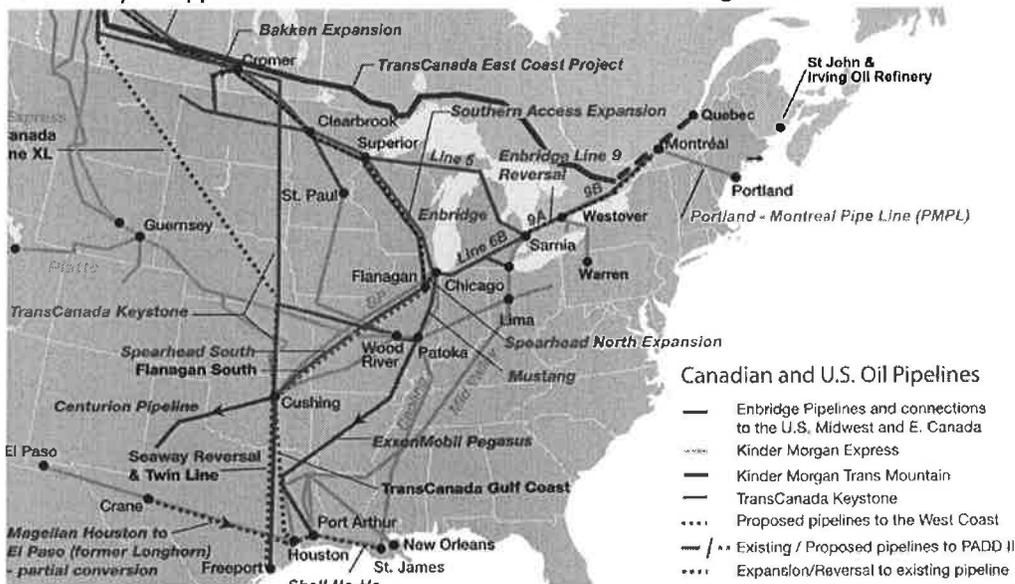
The cumulative risk of adding additional lines to this region is too high to have the routing parameters set by what Enbridge 'wants'. They should not be allowed to frame the debate on this issue. The citizens of Minnesota and this state's governing and regulatory agencies need to reject this framing by Enbridge/NDPC



and reframe the discussion regarding the need and route of the proposed Sandpiper pipeline as what is beneficial to Minnesota, its people, its communities and its natural resources. Until Enbridge/NDPC adequately provides a detailed explanation for demanding why the Sandpiper pipeline must end in Superior, Wisconsin, *Friends of the Headwaters* believes all alternative routes must be given full consideration, even those proposing a system overhaul of how and where Enbridge wants to cross the state.

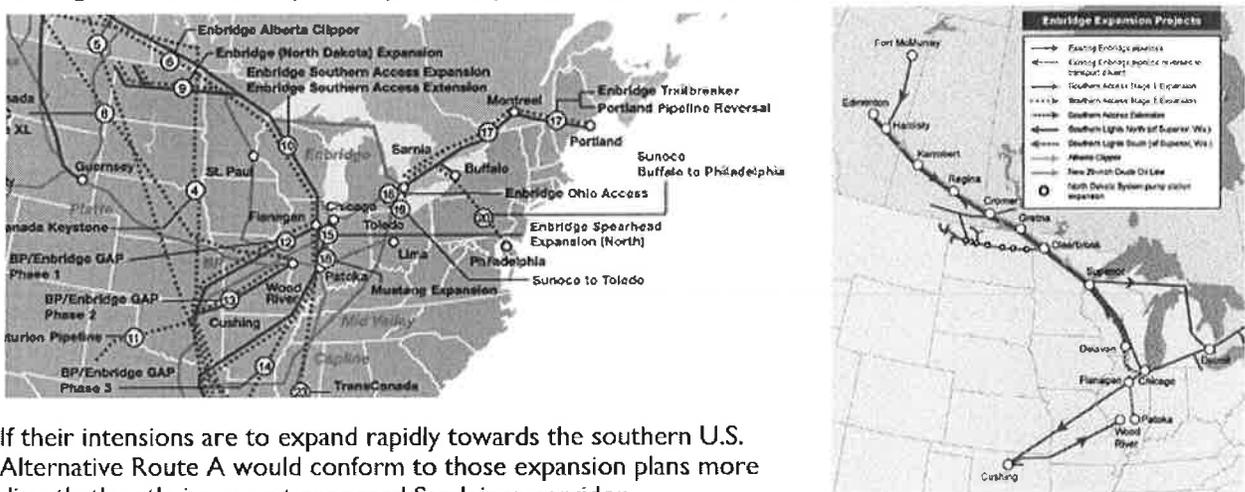
If Enbridge/NDPC were truly committed to protecting our lakes, rivers, wetlands, aquifers and lands as they publically state they are, then prove it by not just giving Minnesotans statistics about how safe their pipelines are (their history says otherwise), but by actually moving their proposed route to the lowest risk part of the state as portrayed on the previously presented illustrated maps.

Costs should not be a factor. After all, once the Sandpiper is constructed, 375,000 barrels of oil will pass through it daily. At the current world price for a barrel of oil that amounts to \$40 million dollars per day or \$14.6 billion dollars annually. Even though Enbridge is charging a fee to move the amount of oil, it should not take too many years to recoup their construction costs. Plus it appears from the map below the company has plans to expand the pipeline system through Wisconsin. The money allocated for that extension could easily be applied to the extra construction costs of building Alternate Route A.



Since the company is adamant about Superior as a destination for the Bakken crude, perhaps this proposed extension in Wisconsin could be used to move the oil from the end of Alternate Route A back north to Superior.

Enbridge has ambitious expansion plans not just in Minnesota but nationally it appears.



If their intentions are to expand rapidly towards the southern U.S. Alternate Route A would conform to those expansion plans more directly than their current proposed Sandpiper corridor.

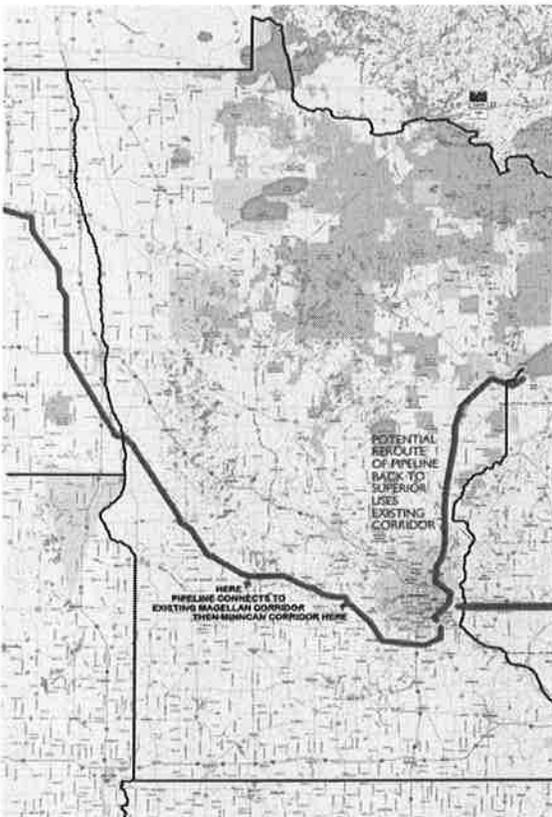
The *FRIENDS of the HEADWATERS* also sponsors other alternate routes at this time.

These routes can be connected back to Superior along existing energy corridors.

ALTERNATE ROUTE "C" as previously proposed in Position Paper of 4/2/2014

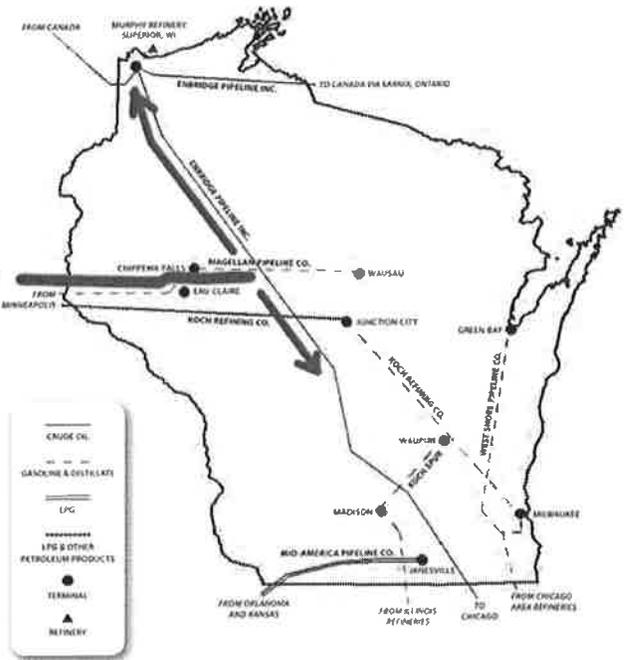
West of Grand Forks near Larimore the Sandpiper would turn south following either railroad easements or road easements south-southeast down the Red River Vally, crossing the Red River near Wahpeton, ND and continuing along MN Hgy 9 until it intersects an existing pipeline corridor owned by the Magellan Company. The Sandpiper follows this corridor until its intersection with the MinnCan pipeline corridor at which point it follows this corridor to the Flint Hills and Saint Paul Park refineries and pipeline system southeast of the Twin Cities Metro area. Optionally the route could turn south from Enbridge/NDPC's proposed pumping station near Lakota, ND.

Route C bypasses Minnesota's sensitive lands and waters and gives Enbridge the option of two routes back to Superior. They can use an existing pipeline corridor along I35 to Duluth whereupon they would intersect their northern corridor and can turn east to Superior. Or they can use another existing pipeline corridor, the Magellan straight east into Wisconsin where that line intersects the Enbridge system in central Wisconsin. At that point Enbridge can use their proposed expansion line to move the oil back to Superior or down to Illinois.



MAP APPENDIX

Wisconsin Petroleum Pipelines



Source: Wisconsin Office of Energy Information

WISCONSIN ENERGY STATISTICS YEAR 1 197

Friends of the Headwaters does question how excited the people of Wisconsin might be about new pipelines.

Pipeline builder to pay forfeiture
 Enbridge Energy Partners agreed to pay \$1.1 million to settle claims that the company violated environmental regulations in connection with the construction of an oil pipeline spanning Wisconsin.

A map of Wisconsin showing the location of a pipeline. The pipeline is shown as a line running from the northwest to the southeast, passing through several counties. Labels include Superior, Hayward, Green Bay, Madison, Janesville, and Delavan. The map also shows neighboring states: Minnesota, Iowa, Illinois, Michigan, and Indiana.

Source: Enbridge Inc. DAVID ARRANAS-darranas@journalherald.com

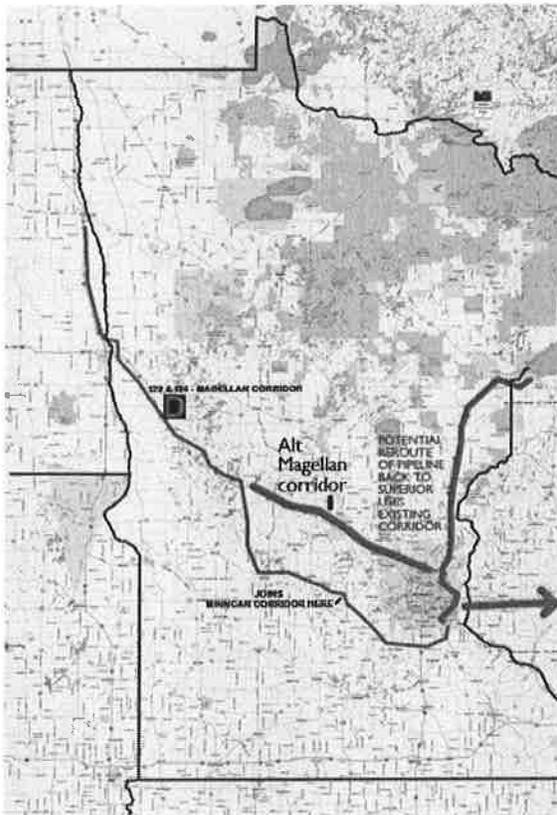
The *FRIENDS of the HEADWATERS* also sponsors other alternate routes at this time.

These routes can be connected back to Superior along existing energy corridors.

ALTERNATE ROUTE "D" as previously proposed in Position Paper of 4/2/2014

Near Grand Forks the Sandpiper would turn south following an existing pipeline corridor along Interstate 29 south towards Fargo, North Dakota then follow the same corridor east southeast adjacent Interstate 94. This existing pipeline corridor is owned by the Magellan Company, the same company which has the line continuing east from Minneapolis-StPaul into Wisconsin to intersect Enbridge's existing corridor there. The Sandpiper follows this corridor until its intersection with the MinnCan pipeline corridor at which point it follows this corridor to the Flint Hills and Saint Paul Park refineries and pipeline system southeast of the Twin Cities Metro area.

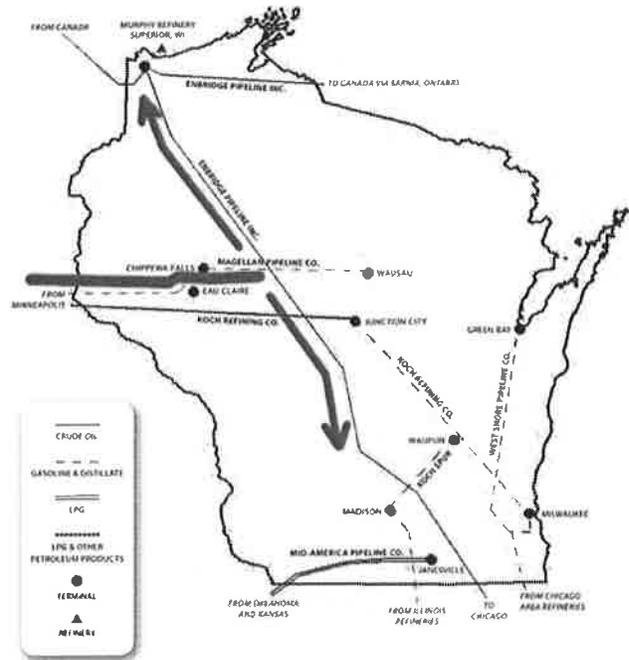
Route D bypasses most of Minnesota's sensitive lands and waters and gives Enbridge the option of two routes back to Superior. They can use an existing pipeline corridor along I35 to Duluth whereupon they would intersect their northern corridor and can turn east to Superior. Or they can use another existing pipeline corridor, the Magellan straight east into Wisconsin where that line intersects the Enbridge system in central Wisconsin. At that point Enbridge can use their proposed expansion line to move the oil back to Superior or down to Illinois.



Route D could also stay in the Magellan corridor along I94 and continue on into Wisconsin.

MAP APPENDIX

Wisconsin Petroleum Pipelines

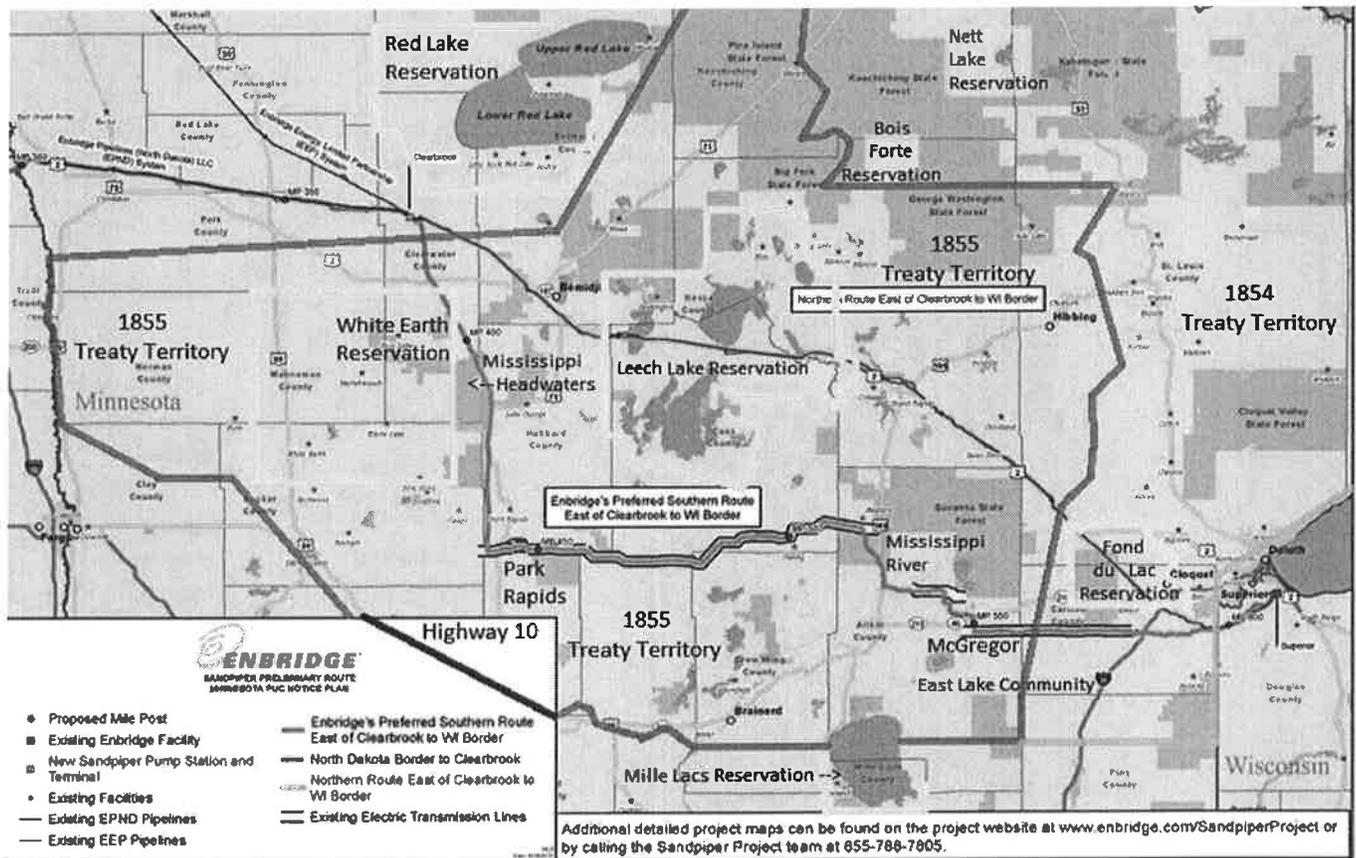


WISCONSIN ENERGY STATISTICS YEAR | 2017

Although these alternate routes avoid the high risk environmental lands and waters of the state as exhibited in the maps below, they do traverse areas of higher population near the Twin Cities. This route does allow a connection along existing pipeline corridors into western and central Wisconsin to Enbridge's pipeline system in Wisconsin. Enbridge has option to ship oil north back to Superior, WI or south to Chicago hub.



In summary the *FRIENDS of the HEADWATERS* opposes the Enbridge/NDPC Sandpiper Pipeline route proposal as marked on the map below. What does it say about a company that would neglect to feature the state's most famous river, the Mississippi, on their proposed route map? Perhaps this is evidence of their true concern for Minnesota's valuable and cherished water resources.



Enbridge already has too large a footprint across Minnesota's Headwaters Country.

Too much is at risk, not only with the state's clearest lakes; ground water aquifers; fish and wildlife; wild rice; lake and riverfront homes, businesses, and communities; tourism industry; lands and forests; but there's also Lake Superior.

Does Enbridge's insistence on the pipeline ending at Superior portend a future of shipping oil on the Great Lakes? Ironic that a ship icon just happens to be on the adjacent map.

The people of Minnesota should not allow a Canadian corporation with its North Dakota Pipeline Company US subsidiary to dictate the terms of this project.

The company has yet to explain the need for Superior as the end point. This proposed pipeline route should not proceed without legitimate justification. Said reasoning should not include corporate profits.

Friends of the Headwaters believes up here a barrel of water IS worth more than a barrel of oil.



13 - 474

Kary Hartman,

Honor the Treaty Rights in MN.
We do NOT need this Pipeline.

Melony Moss

RECEIVED

MAY 29 2014

MAILROOM

Hartman, Larry (COMM)

From: Emily Moore <emilymooremn@yahoo.com>
Sent: Tuesday, May 13, 2014 4:53 PM
To: Hartman, Larry (COMM)
Subject: Docket # 13-474

Hello Larry,

Thank you for calling yesterday about the difficulty your website is having with the "submit" button. Here is my submittal:

Re: Docket 13-474

Impacts

I urge the Public Utilities Commission to deny the proposal for the Sandpiper pipeline because:

1. The proposed route for the Sandpiper Pipeline is through country too remote for a pipeline leak to be easily recognized or for an emergency response team to reach in the event of a pipeline leak. The potential damage to sensitive wetland areas is far too great for the State of Minnesota to approve. We Minnesotans have a precious shared resource that needs to be protected, for us now and for our children and all future generations. Since the future generations have not been born yet and since the young children who are with us now are too young to advocate for their legacy, we have a responsibility to them to create the policies now that will protect the land for them in the future. Being more cautious about siting pipelines and holding companies accountable for the safety and responsible maintenance of pipelines is a good start.

2. Enbridge has an atrocious multi-year record for meeting its liability requirements and responsibilities when leaks occur. Contamination remains in the Kalamazoo River region in Michigan even now, and the company has been unaccountable to the people who live there. We do not want our beautiful state to experience the same damage, and any expansion is for that reason unacceptable. The pipelines that already exist are enough risk. They leak more than is ever reported as it is.

3. Minnesota's wild rice crop is a treasure, both for residents of our state and for those who live elsewhere. It is a major source of good nutritious food for many Indigenous families and for the rest of us who value nutritious, unadulterated wild rice. The pipeline in its current route is much too close to the lakes where wild rice grows and is harvested. An oil leak could contaminate the area for years, destroying this unique and valuable source of nutrition and income for the Indigenous people who harvest it. I have seen Indigenous teenagers return from helping with the harvest, and I sense in them a pride and connection with the earth and their history that is heart warming. That heritage should be encouraged and respected, not destroyed by a poorly sited-pipeline. Minnesota heritage is shared by us all and is irreplaceable.

Mitigation

1. Accept the route proposed by Honor the Earth that follows a highway and could therefore be noticed and accessed in case a spill occurs. It ends in the Twin Cities, offering an opportunity for the oil to be refined and used in Minnesota instead of being exported through the Great Lakes to the East Coast. That route would also decrease the danger to the Great Lakes of accidental oil spills.

2. Hold Enbridge accountable for keeping all existing pipelines in Minnesota in good condition. There are already many aging pipelines running through our state, and regulations are either not in place for them or are not being enforced strictly enough. The company should be paying the full cost for its activity in Minnesota, not the taxpayers and local residents. Regulations requiring stricter liability measures should be put in place for all pipelines in Minnesota.

3. [Federal government] Require companies that are extracting oil in remote places far from refineries to construct refineries near the point of extraction, to reduce the potential for environmental damage in transit.

Thank you very much. My contact information is below.

Emily Moore

4055 Colfax Avenue South
Minneapolis, MN 55409
Hennepin County
612-824-3184 (home)
612-281-0319 (cell)
emilymooremn@yahoo.com

5/4/14

13 - 474

Dear Mr. Hartman,

I'm voicing my comment regarding the Sand Piper pipeline. It is a threat to our water, our aquifers, our wild rice beds, our health today, and ~~generat~~ to future generations. # Spills, leaks, and/or train car accidents (explosions or derailments) are inevitable.

~~Re Route~~

How can the benefits outweigh the hazards of such a pipeline? Reroute all proposed pipelines so they're not near our headwaters of the Mississippi, the Great Lakes, nor near our Wild Rice beds.

Sincerely,

Christal Moose

RECEIVED

MAY 21 2014

MAILROOM

Hartman, Larry (COMM)

From: Jeff Mosner <jlmosner@gmail.com>
Sent: Tuesday, April 15, 2014 3:17 PM
To: Hartman, Larry (COMM)
Subject: Notice of Extended Comment Period - Sandpiper

Mr. Hartman:

I noticed the extension, but I see that the Sandpiper Pipeline project is currently not available on the drop down list at the DOC on-line comment website. Would you see that this is corrected asap?

Related, will the DOC be publishing notices in the affected county's newspapers again so that citizens (especially those returning from their winter homes) are aware of this opportunity for public comment?

Thanks,
Jeff Mosner

Jeff Mosner
18506 Evening Dr
Park Rapids, MN 56470

April 2nd 2014

To: 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

Re: Enbridge and North Dakota Pipeline Company, LLC Sandpiper Pipeline Route, Docket Number PL-668/PPL/PPL-13-474

Dear Mr. Hartman,

This letter will attempt to address some of the environmental risks of this proposed pipeline. I especially want to deal with Mr. Hartman's public comments about pipelines being safer for transport of oil than railroad or other forms of transportation at the public meetings held on Sandpiper.

According to a June, 2013 Manhattan Institute for Policy Research report, 70% of US petroleum is transported by pipeline. See the full report at the link below:
http://www.manhattan-institute.org/html/ib_23.htm#.UznWzKhdX6R

According to this report, almost 500,000 miles of interstate pipeline crisscross America, carrying crude oil, petroleum products, and natural gas. Tanker and barge traffic accounts for 23 percent of oil shipments. Trucking accounts for 4 percent of shipments, and rail for the remaining 3 percent. Although more incidents occur when transporting petroleum products by trucking and rail (and gain more media exposure due to the sometimes horrific property damage and loss of life), this does not take into account environmental damage caused by petroleum spills.

The same Manhattan Institute report indicates that on average, pipeline "incidents" typically result in larger spills. In the nineteen years between 1992 and 2011, some 2,516,625 barrels of petroleum were spilled by pipelines in the US. And it is significant to note that *only 40% of this pipeline spilled oil was ever recovered*. From 2005-2009, petroleum spilled from pipelines in the US totaled 6,592,366 gallons, while spills from road and rail were 477,558 and 83,745 gallons respectively.

Pipelines have spilled 10 times more petroleum than rail tankers and trucks as the following chart from this Manhattan Institute for Policy Research report shows. The chart does show that oil released per billion ton miles is slightly lower for pipelines. But, since only 40% of it is recovered, and, as will be discussed below, at least as much unknown oil has leaked below ground as has been spilled above the ground due to "slow leaks", pipelines are clearly not safer modes of crude oil transportation than either rail or truck. This more detailed analysis of the data refutes any conclusion to the contrary that might be drawn from the Manhattan Institute report.

Table 9: Comparative Statistics for Petroleum Product Release Rates: Onshore Transmission Pipelines vs. Road and Railway (2005-09)

| Mode | Avg. Product Release Per Year (gallons) | Release Per Incident (gallons) | Release Per Billion Ton-Miles (gallons) |
|---------------------------|---|--------------------------------|---|
| Road* | 477,558 | 687 | 13,707 |
| Railway* | 83,745 | 1,688 | 3,504 |
| Hazardous Liquid Pipeline | 6,592,366 | 19,412 | 11,286 |
| Natural Gas Pipeline** | - | - | - |

*Only incidents involving and ton-mileage carrying those products carried by pipeline (petroleum products, liquid natural gas, etc.) are counted for road and railway

**No release volume data are available for gas pipeline in the PHMSA incident database

Sources: Ton-Mileage values are based on Tables 1-50 (for Natural Gas Pipeline) and 1-61 (all others) of the Department of Transportation, Research and Innovative Technology Administration, Bureau of Transportation Statistics "National Transportation Statistics", available at http://www.rita.dot.gov/bts/sites/rita.dot.gov/bts/files/publications/national_transportation_statistics/index.html, accessed April 2013. Incident and release volume data for Road and Railway were extracted from the Office of Hazardous Materials Safety "Incident Reports Database Search" at <https://hazmatonline.phmsa.dot.gov/IncidentReportsSearch/>, accessed April 2013. HL Pipeline release volumes were extracted from the Pipeline and Hazardous Material Safety Administration "Hazardous Liquid Accident Data - 2002 to 2009" file available at <http://phmsa.dot.gov/portal/site/PHMSA/menuitem.ebdc7a8a7e39f2e55cf2031050248a0c?vgnextoid=fdd2dfa122a1d110VgnVCM1000009ed07898RCRD&vgnnextchannel=3430fb649a2dc110VgnVCM1000009ed07898RCRD&vgnnextfmt=print>, accessed April 2013.

It is important to understand why pipelines leak so much oil. The MPCA and Minnesota Office of Pipeline Safety reveals in some detail the fallibility of some of the most sophisticated technology and the willingness of pipeline operators to underestimate or ignore the significance of material flaws and deterioration data even when the technology does detect them. Standards for pipeline material (steel) construction and welds can only go so far to ensure safety. Handling of the pipe during installation, ground movement stresses and operator error are contributors to leaks and spills that material standards are obviously unable to overcome.

According to the EPA's Bristol Bay Alaska, Pebble Mine pipeline risk assessment that also made the point that better engineering doesn't reduce incidence of pipeline leaks or ruptures very much. Quoting this report, "It may be argued that engineering can reduce pipeline failures rates below historical levels, but improved engineering has little effect on the rate of human errors. Many pipeline failures, such as the cyanide water spill at the Fort Knox mine (Fairbanks, Alaska) that resulted from a bulldozer ripper blade hitting the pipeline (ADEC 2012), are due to human errors. Perhaps more important, human error can negate safety systems. For example, on July 25 and 26, 2010, crude oil spilled into the Kalamazoo River, Michigan, from a pipeline operated by Enbridge Energy. A series of in-line inspections had showed multiple corrosion and crack-like anomalies at the river crossing, but no field inspection was performed (Barrett 2012). When the pipeline failed, more than 3 million L (20,000 barrels) of oil spilled over 2 days as operators repeatedly overrode the shut-down system and restarted the line (Barrett 2012). The spill was finally reported by a local gas company employee who happened to witness the leak. The spill may have been prevented if repairs had been made when defects were detected, and the release could have been minimized if operators had promptly shut down the line."

Please note the two memos also attached from the MPCA to the NTSB. They describe in detail what went wrong with one of Enbridge's pipelines between Clearbrook and Superior, resulting in a 1.7 million gallon spill in 1991 in Grand Rapids as well as the 250,000 gallon rupture in Cohasset in 2002. Also pay special attention to the footnotes on the 7/10/2003 memo that raises the probability that at least as much unknown oil has leaked below ground as above the ground due to "slow leaks". This, along with the fact that most of this oil is never recovered is why pipelines are NOT safer than other methods of transport. Scary stuff considering the proposed Sandpiper pipeline preferred route is over some of the most susceptible ground water aquifers in the state.

Pipelines deliver their product to fixed end points, while delivery by railroads is more flexible and delivers product to where it is needed. The big environmental issue for pipelines, is that when pipelines have a problem it is almost always a big one. Often these leaks or spills are in remote areas and may be where pipelines were installed in wetlands over frozen ground. Accessing this remote spill sites with recovery and repair equipment can be difficult and cause damage to the sensitive wetland area affected.

And pipelines often leak for days before the spill is even noticed. This was demonstrated most recently in North Dakota where a pipeline leaked over 20,600 barrels (865,200 gallons). This, the largest inland pipeline spill in recent US history, was not discovered until a farmer noticed the oil in his fields. Even the pipeline company cannot explain how long the leak was active, let alone what caused it.

In comparison, when a rail-car is involved in accident, the environmental impact is almost always limited. The capacity of today's tank car is between 25-30,000 gallons (just over 700 barrels) and the overwhelming majority of rail spills reported by the Department of Transportation involve amounts of less than 5 gallons. The spill locations are often far more accessible that pipeline leak sites and equipment for oil recovery and repair can reach these sites rapidly by rail or road.

These risks for pipelines are real and much greater than the pipeline companies are prepared to admit at public meetings. Having a public official like someone in your position with the Department of Commerce mislead the public about the relative safety of pipelines at meetings being held on Sandpiper does not show the impartiality you claim to adhere to in your statements made at the opening of each of these meetings.

I am not advocating for continued reliance on rail to ship Bakken crude from North Dakota. What I am advocating for is a full EIS of this route that will provide accurate facts for comparison of the risks from all alternatives and reveal a clear picture of the the high probability of any pipeline leaking and causing significant irreparable harm to our environment.



OPTIONAL FROM NDPC NORTHERN LINE

129 & 194 - MAGELLAN CORRIDOR

CONNECTS FROM EXISTING NATURAL GAS PIPELINE CORRIDOR

ALTERNATE "C" PIPELINE CONNECTS TO EXISTING MAGELLAN CORRIDOR HERE THEN MINNCAN CORRIDOR HERE

CONNECTS TO EXISTING NATURAL GAS PIPELINE CORRIDOR

FOLLOWS ROUTE OF ENBRIDGE-ALLIANCE NATURAL GAS PIPELINE CORRIDOR FROM SHERWOOD, ND ACROSS MINNESOTA, IOWA, ILLINOIS TO CHICAGO AREA

D

A

B

C

Method

The PUC/DOC or other state entity should require Enbridge provide a "financial assurance" fund or an escrow account for long term recovery or cleanup and ultimate removal of the Sandpiper pipeline from the ground when it has outlived its usefulness. Also, this routing process for this new line should be done with sufficient foresight such that ultimate pipeline removal does not cause secondary damage to sensitive resources such as bogs, swamps and other large wetlands.

When attempting to determine the best route for the pipeline, an excellent method that does GIS route optimization would be to contract with a company such as Foster Wheeler. The following describes their services which would nicely answer the environmental comparative factors the PUC needs to be analyzing in it's review. We NEED to be making use of these modern tools! From their website, "Our skills in Geographical Information Systems (GIS) add real value. This is an indispensable tool for defining and optimizing pipeline routes as it enables the collection and inclusion of all relevant data, including geographical considerations (topography, vegetation/habitat types), community limits, crossings of roads, rivers and railways etc. from a wide array of different sources. Collating and displaying these environmental and anthropological constraints the software allows spatial analysis and preliminary modeling of multiple factors and key considerations in pipeline routing, and subsequent presentation of this data in a variety of map-based contexts." This is a link to their site: <http://www.fwc.com/What-We-Do/Upstream-Oil-Gas/Expertise-Upstream-Oil-Gas/Onshore-Pipelines.-Terminals-Storage.aspx>

Considering all of the environmental risks that I have outlined, I urge you to begin a full Environmental Impact Study on this project as soon as possible. The risks to the highly vulnerable lakes, rivers, wetlands and watershed in our community demand it.

Directly from the Minnesota Environmental Protection Act.

"No state action significantly affecting the quality of the environment shall be allowed, nor shall any permit for natural resources management and development be granted, where such action or permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other natural resources located within the state, so long as there is a feasible and prudent alternative consistent with the reasonable requirements of the public health, safety, and welfare and the state's paramount concern for the protection of its air, water, land and other natural resources from pollution, impairment, or destruction. Economic considerations alone shall not justify such conduct."

Only through a full EIS can those words have substance.

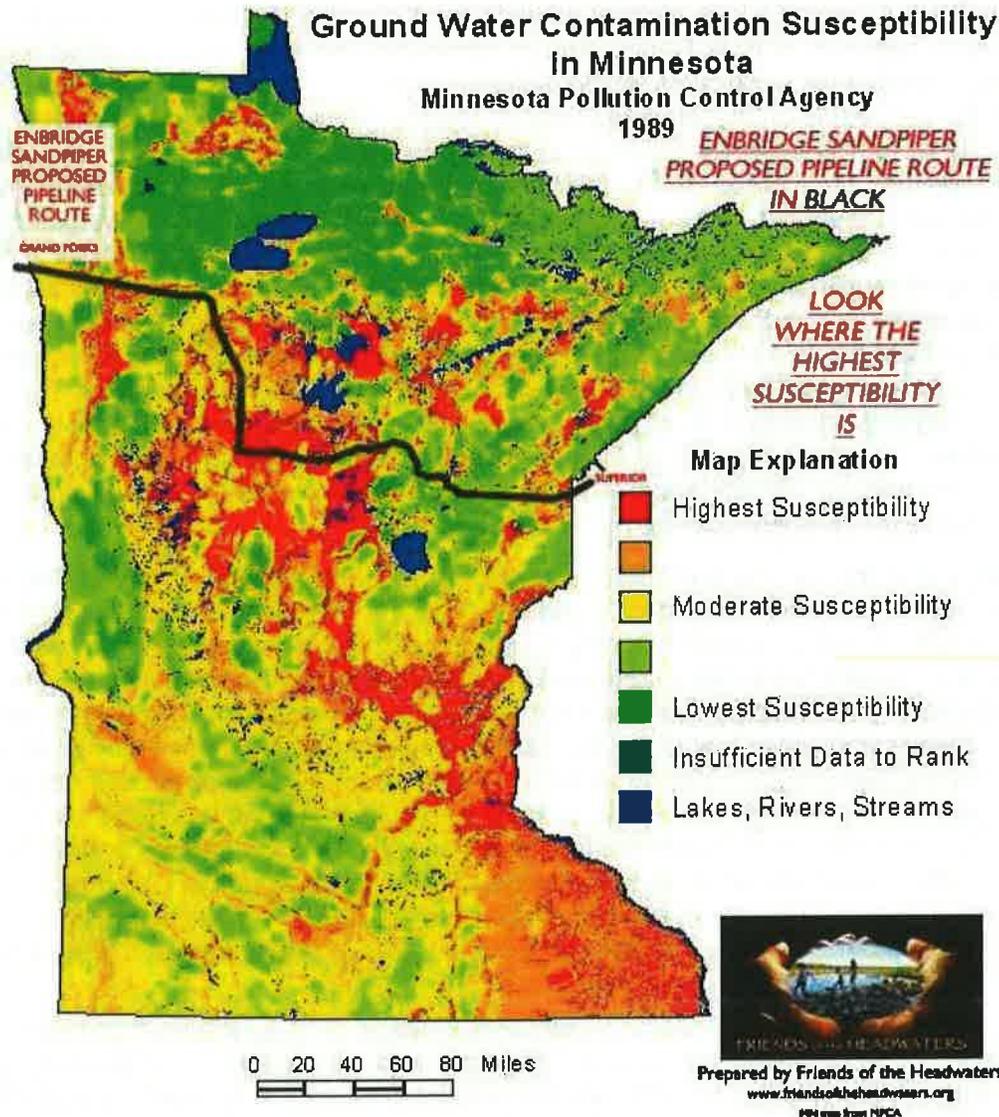
If not this route, where then? Alternate Routes to Consider

I believe we need to stay away from our lake country in northern Minnesota due to all the reasons provided above. Instead, I urge you to consider the following 4 routes, as shown on the map below:

Impact to our Ground Water

Ground water contamination susceptibility in Minnesota

In 1989, the Minnesota Pollution Control Agency published a statewide evaluation of ground water contamination susceptibility. The assessment used four parameters (aquifer materials, recharge potential, soil materials, and vadose zone materials) to delineate areas of relative susceptibility to ground water contamination. The following map was developed as a result of this MPCA study.



As you can see, the proposed pipeline's route passes over some of our most vulnerable ground waters in Hubbard and Cass County. Could they have picked a worse location? We recently learned that the aquifer used for Park Rapids drinking water has been compromised by nitrates due to regular application of fertilizer on our surrounding agricultural fields. Park Rapids residents have been notified they will need to foot the bill for a \$2.5M water treatment facility. This problem is made worse because of the relatively porous soil and shallow aquifers as clearly noted in the map above. A pipeline carrying dirty oil across this land is a catastrophe waiting to happen. Studies of pipeline safety find that the probability of major leaks and spills is surprisingly high virtually

guaranteeing multiple major leaks or spills over the life of the line. A major spill or even a small underground leak that went undetected could endanger the water supply these communities depend on for their very existence.

Economic Impact

The tax capacity of lake shore real estate in Hubbard County (2012 data) is approximately \$20 million annually. (Hubbard County, a county blessed with an abundance of lakes has an annual tax capacity of \$34 million dollars. 59% of its properties are "water-influenced" meaning that they abut or have a view of a lake or river, yielding the \$20 million figure). Assuming a major oil spill in the area just north of Park Rapids that contaminated the 4700 acre lake chain that includes Island, Eagle, Potato, Fish Hook lakes this would result in a loss in real property values. The tax capacity of the properties on these lakes found in Todd and Arago townships is valued at approximately \$2 million annually. Since these lakeshore owners can no longer enjoy the water-based activities they once could, due to their now polluted lakes it would not take long for their property's values to plummet. How would you like to buy property on an oil-fouled lake that is now off-limits to fishing, swimming, water-skiing, etc.? Assuming a 50% reduction in property values this would represent a loss of about \$1 million dollars each year in property taxes paid to Hubbard County, other subdivisions of the state in Hubbard County including Park Rapids, various school districts, and other special taxing districts. The business revenue brought into Hubbard County each year by tourists alone is estimated to be \$30 million dollars. This tourist revenue is easily impacted by natural occurrences such as a late ice-out or lack of snow for winter activities. Imagine the impact of a major oil spill contaminating our rivers or lakes. Government officials need to understand that this result is not a loss of tax revenue for one year but loss of that revenue every year for many years.

I have no idea who the owners and controlling parties are of the legal entity North Dakota Pipeline Company, LLC and I have no idea what net assets they control. In the past, however, there have been too many situations in which after the fact it is discovered that an entity that is responsible for a disastrous event simply walks away and it is found that there are almost no net assets available to pay those parties that were damaged. The responsible entity's assets are pledged as collateral for huge loans and the liability shielded parent owner entity drained earnings from the responsible entity for years in management fees. Often most if not all of the small net assets of the responsible entity are used to pay legal and accounting fees and expenses. In any event, it is normally the fact that it takes years for damaged parties to receive any compensation. Consider what happened when Freedom Industries in Charleston West Virginia filed for bankruptcy without hiring a single defense attorney after the first law suit was filed against the company for the chemical spill that entered the drinking water supply for the Charleston Metropolitan Area in December 2013.

Private property owners will be unable to claim loss in value of their lake front property on their home owners insurance policy. Those policies are written to compensate the insured against damages to structures and the contents of structures along with some small coverage for some consequential losses only. Petroleum spilled and spread across the lake in front of their structures does not cause any damage to the structures or the contents.

In addition to tax dollar losses to governments, there may be widespread failures of most businesses in the Park Rapids and surrounding areas if the spill impacts the Island-Eagle-Potato-Fish Hook chain or to Bemidji, which has the distinction of being "the first city on the river", if the spill impacts the Mississippi River headwaters. Banks that have made mortgage loans on business, home and lakeshore recreational properties may fail as property owners walk away from worthless properties for which they have not been compensated at anywhere near an amount equal to the remaining principal amount of the mortgage.

#13 - 474

Dear Larry:

The land is for people, not paper
unagi!

Shawnte Perry

11

RECEIVED

MAY 21 2014

MAILROOM

From: Vicki Murphey
To: Hartman, Larry (COMM)
Subject: Pipeline
Date: Friday, May 30, 2014 11:08:40 PM

Dear Sir,

Please do a EIS done on the pipeline that is being placed north of Outing MN. This could impact the natural springs in that area that feeds in Lake Roosevelt and eventually to the Mississippi. I am in favor of the pipeline but would like its placement around that area studied.

Thank you,
Vicki Murphey

Sent from my iPhone

Jane Fisher-Merritt

From: Sharon Murphy <smurphy@wholefoods.coop>
Sent: Wednesday, March 26, 2014 2:37 PM
To: PublicComments.puc@state.mn.us
Subject: Routing Permit #13-474

Thank you for accepting public comments on the route for the Enbridge Sandpiper pipeline. The Enbridge amended preferred route which avoids passing through or near the Food Farm (Wrenshall) and follows existing pipelines for five miles in the eastern part of Carlton County is a significant improvement in the route for this area.

On behalf of a food cooperative with 8,000 Owners in the Duluth area, it is very important to Whole Foods Co-op, to our community of consumers of locally and sustainably grown food, and to our environment that there be no degradation or diminishment of land available for Food Farm, Northern Harvest Farm and other growers in Carlton County.

This isn't just about money. This is about preserving sustainable agriculture, growing the capacity of our region to feed its residents, and ensuring the health of the ecosystems surrounding Lake Superior.

Sharon Murphy
General Manager
Whole Foods Co-op
610 East 4th Street
Duluth, MN 55805
smurphy@wholefoods.coop

Hartman, Larry (COMM)

From: SHARON NATZEL <sorgww@aol.com>
Sent: Friday, May 30, 2014 9:39 AM
To: Hartman, Larry (COMM)
Subject: PUC13-474 Sandpiper Pipeline Route Comments

Larry, These are my comments for the PUC 13-474 Sandpiper Pipeline Route. Please include them in the public comments for the docket. Please let me know if you have any questions.
Thank you! Sincerely, Sharon Natzel, 13623 County 20, Park Rapids, MN 56470

PUC 13-474

The comparative environmental analysis needs to consider these human and environmental factors – that the number of wells in southern Hubbard County is large – residential, industrial, rural, seasonal lakeshore, and irrigation pivot - which could be easily contaminated due to the porous soils if there were a spill or leak in the Sandpiper Pipeline. Because of the porous soil, our well and several others already have nitrates. I checked with the manufacturer of my home water distillation unit to see if it would be effective for crude oil contamination should our well end up with crude oil like some in North Dakota are dealing with now. I learned that because the contents of the fracked oil are not just crude oil and the contents are not public knowledge due to trade secrecy that water distillation consultants are unable to advise specifically nor test appropriately. I don't know if I'll be able to clean the unit effectively without knowing the contents of the fracked oil. I learned, for example, some inorganic contaminants have boiling points well above the boiling point of water and will remain behind in the residue water in the boiling chamber. Whereas organic impurities do not have fixed boiling points like the inorganic compounds do, but a range of boiling points. It is possible that some of the fracked oil may contain chemicals that boil at a higher temp than water and could cause the unit to be essentially disabled to clean water with distillation unit effectively. This would be true for the Sandpiper pipeline oil and the cumulative effect of Line 3 pipeline oil in the southern preferred route of Hubbard County.

The comparative environmental analysis needs to consider this human and environmental factor and method to address the impact. United States Steel should be utilized in the pipeline based on information provided to me by a call from gentleman in the northern part of Hubbard County who currently has 2 pipelines running across their land. One pipeline is an all United States Steel pipeline which has been in the ground since 1954 (60 years). They have experienced no problems with this pipeline on their land. However, the second pipeline running through their land since 1972 is Japanese Steel. This pipeline has had leak problems, and has had to be dug up and repaired several times. When the pipeline is dug up, the groundcover is disturbed and requires TLC and fertilizer to recover also. They have 1 to 2 acres affected in this manner. This is lots of effort for the landowner. Using US Steel also keeps additional jobs in the U.S.

The comparative environmental analysis needs to ensure that the natural resource of clean, clear, healthy fresh water is preserved in MN and not contaminated for human consumption and thus eliminating the possibility of future business opportunities in MN. The human need for this now abundant fresh water of MN may require the future potential of bulk water export or water appropriation. The PUC CEA needs to guard against human and environmental impacts to this resource.

- The routes for potential water pipeline(s) within and from Minnesota need proactive investigation now by scientists, our legislature, the U.S. Federal Government, MN State Government, and the public

to ensure these pipelines aren't positioned in such a way to allow for over-appropriate the MN water resource by one user that can cause issues for the multiple stakeholders. We also need to ensure MN has authority to regulate our States' water resources and that NAFTA and the GATT do not become applicable to United States water resources.

- If a pipeline corridor becomes established east across Hubbard County to Superior, WI, it is highly likely that the North Dakota Pipeline Company, LLC / Enbridge (a Canadian Company) will want to utilize the corridor for not only oil but also water export – especially since an oil pipeline has a life span of 50 years based on the DNR comments and the Bakken is projected to run out in about ½ that timeframe. The likelihood of the desire of the pipeline company to utilize the corridor also for water appropriation or bulk water export is based on the facts that the proposed southern route is across the clearest lakes in MN, the high concentration of wetlands in the route and position of the route to the water basins of US and Canada, plus it crosses the Mississippi River in two places which already provides drinking water for over 50 communities.
- The method of proactively identifying and utilizing specific corridors for specific product-type pipelines should be considered by the PUC / Dept of Commerce that won't risk contamination of our natural resource of water required for life on our plant. The currently preferred southern route risks the fresh water resources of Minnesota because a pipeline will leak. The EPA's EIS for the Pebble Mine near Bistol Bay, Alaska concluded in each of their three risk scenarios, there would be a greater than 99.9% chance at least one of the three pipelines would fail during the project lifetime. Based on that data, the EPA denied a permit.

A specific method to utilize for the comparative environmental analysis is this - - utilize the Kepner Tregoe Potential Problem Analysis methodology for analyzing human and environmental safety issues.

A specific method to utilize for the comparative environmental analysis is this - - utilize the Kepner Tregoe Decision Analysis methodology for determining the best route for the highest good of Minnesota's natural resources and residents. The Musts would include No potential damage to Minnesota's natural resources, No potential damage to Minnesota's residents. No leaks, spills, explosions in pipeline or pump stations.

A specific method to utilize for the comparative environmental analysis is this - - utilize a third party contractor chosen by the pipeline safety agency to monitor the construction and make reports to the Pipeline Safety Agency on whether the work is sound. This is similar to a condition found to be necessary for the construction of TransCanada Corp's Keystone XL oil pipeline as released by the State Department on Jan 31, 2014 based on the defects in the pipe – bad welds, dented pipe, and damaged pipeline coating (Associated Press article – new safety requirements set for Keystone pipeline 5/27/14)

A specific method to utilize for the comparative environmental analysis is this - - require NDPC to adopt a quality management program to ensure the pipeline is built to the highest standards from the beginning by all personnel on the pipeline project whether contractors, NDPC, and any others. This was also a condition for TransCanada as released by the State Dept. 1/31/14.

The comparative environmental analysis should take into consideration the human and environmental impacts if an additional route segment mentioned by MPCA in their Sandpiper Route Comments with regard to Upper Twin Lakes is being considered by the PUC. It is possible that the County 6 / Hwy 87 mentioned could bring the pipeline closer to Long Lake where 500 lakeshore owners are located.



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Colin Richard
Neary

Representing: Honor the Earth

Email: colin.roneary@gmail.com

Address: 5 Pearson Street
Callaway, MN
56521

Tel: (860) 874-5815

COMMENTS

The entirety of the Enbridge Pipelines (North Dakota) LLC will travel through 1837, 1854, and 1855 Treaty territories between the Ojibwe Nation and the United States. These usufructuary rights guaranteed by these international treaties in ceded territories supercede the authority of the Minnesota Public Utilities Commission, Department of Natural Resources, Department of Commerce, and Army Corps. of Engineers. The U.S. Constitution states that treaties are "the Supreme law of the land." Furthermore, the United Nations Declaration on the Rights of Indigenous Peoples states that tribal nations are required to have "free, prior, and informed consent" concerning these usufructuary property rights. Finally, I recommend county commissioners, state officials, and federal engineers acquire the full, prior, and informed consent of tribes, with ultimate approval of the Sandpiper Pipeline determined by the ^{affiliated} boards of the Minnesota

Please submit comments at meeting to EERA staff or send to: Chippewa Tribe

Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
Voice: 651-538-1839
Fax: 651-539-0109

Electronic Submittal: <http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>

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Comments Continued:

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Energy Environmental Review and Analysis
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Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Leslie Nessman

Representing: _____

Email: lnessman@igmail.com

Address: 40595 LaDoux Rd
Ponsford MN 56575

Tel: 218-252-3657

COMMENTS

Please "Stop" this disrespectful
awful Pipeline. It will destroy
the earth, our reservation.
Shame on you!

Please submit comments at meeting to EERA staff or send to:

Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
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85 7th Place E, Ste 500
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55101\$6013 C012



May 4, 2014

#13-474

To Whom it may concern-

I am writing voice my staunch opposition of the Enbridge pipelines that are proposed to cross northern Minnesota (the Sandpiper and Alberta Clipper).

The pipeline puts at risk a priceless resource → our water. The thought of a toxic spill (which will happen, it's just a matter of time) is beyond comprehension — what will that mean? Poisoning our water supply — destroying the wild rice, desecrating our natural resources.

What gives them the right to do this?? We must protect the rights of future generations to clean water, and non-polluted land — to enjoy the land and resources that we enjoy.

It is up to us to protect and stand for their rights. It is time to acknowledge that everything is interconnected and we must care for the earth, for if we don't, we are the ones who will suffer.

No more pipelines → time to move to renewable energy. Time to care for our Earth and for future generations.

RECEIVED

MAY 21 2014

MAILROOM

Sincerely, Janet Neville

Hartman, Larry (COMM)

From: Cecelia Newton <newton.cecilia@gmail.com>
Sent: Wednesday, May 21, 2014 12:04 AM
To: Hartman, Larry (COMM)
Subject: PUC 13-474 Proposed Sandpiper Pipeline Project

Dear Sir,

I am writing to you because I am concerned about the proposed Sandpiper Pipeline route. This proposed route is too close to Upper Rice Lake, and if a spill occurred could damage a wild rice harvest that is valued at over \$1 million each year. The proposed pipeline also crosses the Mississippi River twice. When a spill happens, the impacts to the underground aquifers would pose risks to wild rice, our Minnesota water, plants and animals. As a Minnesota citizen I also want to respect the cultural and spiritual of the Anishinaabeg people. Please reject the proposed Sandpiper Pipeline project.

Thanks,
Cecelia Newton

Hartman, Larry (COMM)

From: Deborah Nicholson <deb.nich@gmail.com>
Sent: Friday, May 30, 2014 3:23 PM
To: Hartman, Larry (COMM)
Cc: rep.tom.anzelc@house.mn
Subject: Enbridge Sandpiper pipeline permit. PUC docket numbers 13-473 and 13-474

Dear Mr. Hartman,

As property owners in Cass County on Roosevelt Lake we would strongly urge that other routes be considered for the proposed pipeline. As I am sure you are aware an oil spill in this environmentally sensitive area would be devastating to businesses, property owners, drinking water, fishing and recreation through out a large watershed area as well as the economically important Spire Valley Fish Hatchery. It appears that even the construction of this pipeline will be potentially damaging to streams, trails and wildlife habitat.

Here in Minnesota we are so fortunate to have an abundance of fresh water, a resource that is dwindling and evermore precious throughout our nation. This water is crucial to the economic future of our state and is truly our most valuable natural resource. It is unfortunate that Enbridge with its recent history of ignoring aged and cracked pipelines and its subsequent chaotic response to the ongoing oil spill in Kalamazoo, Michigan has been chosen for this project in such an environmentally sensitive area. We would urge that wherever this pipeline is placed that an Environmental Impact Statement be required and that only equipment and materials that meet the highest safety standards be used to preserve our Minnesota natural resources.

Sincerely,

Deborah and James Nicholson

Hartman, Larry (COMM)

From: Douglas Nick <dnicktc@msn.com>
Sent: Thursday, April 24, 2014 3:08 PM
To: Hartman, Larry (COMM)
Subject: Sandpiper pipeline

Dear Mr. Hartman

I recognize the need for the proposed pipeline and will probably support it. That said I am curious if there are alternate routes that would not potentially harm our lakes in the state. Do we have studies or methods to address the effects of this project on the general environment before it is built?

Respectfully

Doug Nick



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Judy Northbird

Representing: _____

Email: _____

Address: _____

Tel: _____

COMMENTS

No pipeline

Any where on

TRIBAL Land.

Please submit comments at meeting to EERA staff or send to:

Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
Voice: 651-538-1839
Fax: 651-539-0109

Electronic Submittal: <http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>

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Rice, Robin (PUC)

From: anteater aardvark <aardvark6@gmail.com>
Sent: Friday, April 04, 2014 12:46 PM
To: #PUC_Public Comments
Subject: Docket #13-473 routing permit Enbridge

Honorable Commissioners:

Re: routing of Enbridge Sandpiper

I have worked for years part-time on a small organic farm north of Duluth, and my family gets food shares from the Food Farm in Wrenshall, like dozens of other families. I know first-hand the long and delicate process of building and maintaining fertile and productive soil. I also attended one of Enbridge's first informational meetings, so I understand the construction process and a little of Enbridge's compensation and mitigation for construction damage. I also read the newspapers about pipeline expansion and about spills.

The construction process requires an expanded corridor, with heavy equipment. I think that for farmland, the compacting of the soil on this wider right of way is more damaging than standard mitigation allows for. There could be contamination from the heavy machinery, too. Then, the pipeline requires a permanent right of way, so that is out of production forever. Finally, the right of way is a corridor for expansion (as Enbridge has already suggested for the Sandpiper route) so that there will be further widening of the construction corridor with its damage and further permanent loss of productive land. The Wrenshall area has unusually nice soil for farming and an expanding organic farm component: these businesses can't just move. It's not like finding a new house.

Enbridge touts its safety record, which may be great compared to other companies, but one mistake can wipe out an intensely-cultivated organic farm. I don't see how a small farm of this type could survive a spill like the recent non-Enbridge pipeline leak in North Dakota.

I think routing the Sandpiper line through Carlton county must take extra care to save the farms which have tended their businesses so carefully and which depend so directly on the quality of their land, including woodland, and water. Ideally the routing would consider the fate of all the arable land there, since organic farming is expanding, and there just isn't that much good land.

Sincerely yours,
Adeline Nunez
4208 McCulloch St
Duluth MN 55804
April 4, 2014

Rice, Robin (PUC)

From: marie321@q.com
Sent: Wednesday, April 02, 2014 6:48 PM
To: www.PublicComments.puc@state.mn.us
Cc: #PUC_Public Comments
Subject: pipeline

Hello Honorable Commissioner:

My name is Marie Nyblom. My husband and I have lived here in Mahtowa MN for 17 plus years. We live right along the Minnesota power line and our yard where our boys play is right along that area. Our front door is about 200 feet from where the Sandpiper Pipeline is proposing to put the pipeline. Our land here is our little piece of heaven with a trout stream just on the other side of the house, beautiful wooded area, seasonal birds, and much wild life. Its one thing to live with a power line but totally another thing living with a pipeline. Our boys play football, baseball, basketball and just run and wrestle with each other and with their friends in this area close to the proposed site. We ask you to please consider following the existing pipeline area. There is no reason we can't contain where we put a pipeline, it actually makes more sense to put it along the existing pipeline route. Save our Minnesota lands and keep the pipelines in contained existing areas. Thank you for taking the time to read my letter. Marie Nyblom

Hartman, Larry (COMM)

From: Ted Olsen <tkolsen@tds.net>
Sent: Monday, April 21, 2014 12:15 PM
To: Hartman, Larry (COMM)
Subject: In favor of Sandpiper Pipeline Project

Mr. Hartman,
I live on a lake in Minnesota and was contacted regarding this pipeline.

While I don't want to do anything that damages our Minnesota lakes, I believe that we need to make use of our domestic energy sources. Pipelines constructed properly do no damage to the environment and they are extremely good for the environment in that they reduce the number of big trucks on the road.

I am in favor of the Sandpiper Pipeline Project

Ted Olsen

tkolsen@tds.net

Home: 320-354-5947

Cell: 320-220-3084

Rice, Robin (PUC)

From: tomong@roadrunner.com
Sent: Thursday, April 03, 2014 12:29 PM
To: #PUC_Public Comments
Subject: Docket Number 13-474

Dear sirs

I am opposed to Enbridge Pipeline LLC's proposed southern route for the Sandpiper Pipeline. Enbridge should be required to route the pipeline through an area that will not jeopardize the Mississippi headwaters and the lakes, streams, and rivers of Hubbard County and northern Minnesota.

Very truly yours,

Tom Ong
825 Gretna Green Way, Apt. F
Los Angeles, CA 90095

William Thompson (Tom) Ong, author of the Kate Conway trilogy, has a new novel available through Amazon. THE VIEW FROM WALDEN PARK is a thriller based on the love between an architect and a movie star turned princess.



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Jessica Oppegard Representing: Oppegard Family
28216 210th St
Noyah Wush, MN 55056 Email: Urae78@Outlook.com

Address: Tel: (218) 936-0459

COMMENTS

I believe that it is very wrong to even try to destroy something that has been here since before Columbus and is Sacred. By trying to do this it is not only going to hurt the people but the future generation and Gitchi Manidoo

Please submit comments at meeting to EERA staff or send to:

Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
Voice: 651-538-1839
Fax: 651-539-0109

Electronic Submittal: http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599

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Comments Continued:

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Energy Environmental Review and Analysis
MN Dept of Commerce
85 7th Place E, Ste 500
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Hartman, Larry (COMM)

From: apache@web.lmic.state.mn.us
Sent: Saturday, May 17, 2014 7:48 PM
To: Hartman, Larry (COMM)
Subject: Oslin Sat May 17 19:48:25 2014 PL6668/PPL-13-474

This public comment has been sent via the form at: mn.gov/commerce/energyfacilities/publicComments.html

You are receiving it because you are listed as the contact for this project.

Project Name: Sandpiper Pipeline Project / North Dakota Pipeline Company LLC (NDPC)

Docket number: PL6668/PPL-13-474

User Name: Sanda Oslin

County: Aitkin County

City: Sturgeon Lake

Email: sandaoslin@hotmail.com

Phone: 218-273-4019

Impact: PUC Docket Numbers (13-474) I am very concerned about the fact that this will be travelling through a significant number of wetlands, streams and forests. Many of the areas are hard to access year round and in the case of a Kalamazoo River (years later, they are still cleaning it) type spill/failure it may be hard to respond to quickly. Also, how do we know the sensors that would indicate a pressure drop due to a spill or leak would work in a timely manner? Enbridge has a poor record, over 800 spills in 10 years is atrocious. There is too much risk to the watershed to put a pipeline in this part of Minnesota and I don't believe it should be done.

Mitigation: There should be facilities, equipment and employees staged every 50 miles or so along the length of the pipeline, especially anywhere near water or forest land, so spills and leaks can be responded to quickly, before Kalamazoo type damage is done.....better yet, scrap the project.

Submission date: Sat May 17 19:48:25 2014

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick
andrew.koebrick@state.mn.us

#13-474

Larry,

We are Twin Cities residents (enrolled members of a MN Chippewa Tribe).

PLEASE ~~consider~~ ~~not~~ do NOT let this run thru our lakes which provide our food. We always need to focus on sustaining the earth for our children & our children's children.

THIS IS NOT SAFE AND WE ARE

Vehemently **OPPOSED. RECEIVED**

Andrea Feurig
Sonoma Pair

MAY 21 2014

MAILROOM

Hartman, Larry (COMM)

From: Jeff Palkovich <JPalkovich@superioriron.com>
Sent: Tuesday, May 27, 2014 9:23 AM
To: Hartman, Larry (COMM)
Subject: PUC Docket Number 13-473 & 13-474

Dear Mr. Hartman,

I am writing this letter to request the following with regards to the proposed "Southern Corridor" route for the Enbridge Sandpiper pipeline permit:

- That an Environmental Impact Studies (EIS) be conducted on the proposed Southern Corridor route and on the alternate routes that are being considered. Although I support the overall pipeline concept, the fact that no EIS has been completed on any of the possible routes is unheard of. The impact of even a single pipeline rupture at an environmentally critical location could and would do irreparable damage to our woods, water table, lakes, streams, rivers and wildlife.
- That alternate routes be considered and vetted equally for their benefits and impacts.

Again, I do support the use of carrier pipelines for this purpose, but not without consideration given to the environmental impact when one of these pipelines ruptures. And we all know it will happen.

Thank you for your time and consideration in this matter.

Jeff & Barbara Palkovich
7342 Mariner Drive
Maple Grove, MN 55311
763-420-3726

Lake Roosevelt address
629 Sunset Hill Road NE
Outing MN 56662

Hartman, Larry (COMM)

From: fishdrmin@frontiernet.net
Sent: Wednesday, May 28, 2014 7:47 PM
To: Hartman, Larry (COMM); ljpearce7040@gmail.com
Subject: Docket #13-474 Enbridge
Attachments: Enbridge.docx

Dear Sir,
I have attached a letter regarding Enbridge's route permit for the Sandpiper pipeline.

Thank You

Lance Pearce

Lance Pearce
1651 Walnut Court, Mayer MN 55360

May 28, 2014

Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Re: Enbridge Pipeline Route, Docket Number 13-474

Mr. Larry Hartman
Honorable Commissioners:

I am opposed to Enbridge Pipelines (North Dakota) LLC's proposed southern route for the Sandpiper Pipeline for several reasons: personal, economic and environmental.

My family and I own a lake lot on the north end of Duck Lake, located in Crow Wing Lake Township, Hubbard County MN. Personally it has taken us until our mid adult life to save the money to be able to afford lakeshore property, or the so called 'place up north'. Almost everyone who lives in this state can relate to memories from their past or currently when we use that term. I am using our property to prosper the growth of our son and foster memories that will last a lifetime, and in effect keep him occupied and out of trouble, as we see daily in the news and hear in the lives of so many. If Enbridge's proposed southern route is accepted the pipeline will come within about 400 feet of my property line, and well within range of impacting my property should something go wrong with the pipeline. This would ruin what we have taken our whole lives to build and invest in and bring that to ruins. The mere fact that would be there causes concern for both the economic impact and also the environmental impact.

The proposed southern route by Enbridge exposes many properties, lakes, forests and underground aquifers to potential contamination, simply because it is the preferred route by Enbridge. The most notable is both a state and nationally recognized area: the Headwaters of the Mississippi and Itasca State Park. If Enbridge is allowed to use the southern route, the aquifer starting the

thousands of miles of Mississippi waterway will be exposed to potential contamination. Many other letters and documentation have already been submitted as evidence of the poor track record Enbridge has in the area of pipeline safety, maintenance and cleanup after an incident. In a letter submitted by Mr. Richard Smith, President Friends of the Headwaters, not only are alternative routes listed as options, but a map is displayed basically showing that the entire middle of the state is extremely susceptible to groundwater contamination. We have already seen what contamination of rivers can do as evidenced as to what happened to many of our rivers from pollution in the 1960s to 1980s. Through the center of our state we see many lakes, rivers, streams and wetlands. This proposed route will upset the ecosystem in many of them by both construction of the pipeline, but also potential contamination issues discussed herein.

As evidenced of groundwater issues, there are numerous farms within several miles of our property. Last year I wanted to look at putting a well in for our property. The local well company came to survey our lot. I was told we would probably have water at 50 feet deep but I would probably want water at least 150 feet because of the nitrates located in the water at the top of the aquifer. (we only have about 20 feet of elevation down to the lake). This is due to the runoff of the fertilizers and sprays from the local farms. Since we have been there for 3 years, the groundwater has also had increased pressure from contamination because of more forests being turned into farms in the area to add to the demand of the local potato plant in Park Rapids.

The only benefit I see for allowing the southern route is a short lived economic jump in the area of jobs for construction of the pipeline. This would be short lived. Although a couple of years for jobs for many people would be great for them financially in the short term, the potential negative economic impact outweighs the short term benefits. If something goes wrong with the pipeline, spill etc., the impact results in lower property values. We have all experienced what an economic downturn can do to our economy and culture, as experienced in a broad scale in the 2008 recession. When something happens with the pipeline this will be experienced on a local level, but will be more long term and potentially permanent depending on the environmental impact.

Frankly what sense does it make to allow an oil pipeline through a part of the state that, according to experts, is severely susceptible to groundwater contamination. It is also evidenced that the safety record and spill record for Enbridge is less than favorable. This has the potential for grave impacts on both me personally, my lake neighbors, and all the residents of our beautiful state should an section of the pipeline spill. The reasons of personal impact, environmental and economic impact are all intertwined to logically conclude that I cannot support the southern preferred route. This southern route is also not supported by the Duck Lake Association, the Hubbard County COLA, Friends of the Headwaters, and concerns have been raised by the MN PCA, and many others.

Why should we allow a company with a poor safety record to add a pipeline along a route through the area where the Mississippi River begins and along an area of the state that is extremely susceptible to groundwater contamination? That would defy logic. Alternate routes have been suggested based on geologic facts and data that would support the southern preferred route is not the best option. Logically, one of the suggested routes for potentially less damage in the event of any incidents is a better option or Enbridge can utilize the route they are currently using, just add on to the current easements.

For these reasons, if the Sandpiper Pipeline is deemed necessary, then Enbridge should be required to route the pipeline through their existing northern corridor, or along other suggested routes.

Very truly,

Lance Pearce

13-473

Rice, Robin (PUC)

From: Jerry Perkins <jerrypeggy@hotmail.com>
Sent: Thursday, March 13, 2014 3:00 PM
To: Nelson, Greg J (DNR); staff, cao (PUC)
Subject: Public Comment on Docket 13-474
Attachments: Comment on Docket 13 473.txt

Attached and embedded below are our comments submitted in opposition to Enbridge Pipelines' proposed southern route for the Sandpiper Pipeline.

Sincerely,

Gerald V. Perkins, Jr.
John. R. Perkins, JD

To: Minnesota Public Utilities Commission
Greg Nelson, Minnesota DNR Region 1 Director

From: Gerald V. Perkins, Jr. and John R. Perkins, JD.

Re: Citizen comments regarding Docket Number 13-473 for certificate of need and 13-474 for the route permit for the Enbridge Pipelines LLC proposed southern route for the Sandpiper Pipeline

To Whom It May Concern:

We oppose the Enbridge Pipelines' proposed southern route for the Sandpiper Pipeline for several reasons.

First, we believe the pipeline will violate state criteria for pipeline selection as stated in Minnesota law by endangering:

- * the existing population in the area,
- * the natural environment,
- * lands of historical, archeological, and cultural significance,
- * local economies supported by agriculture, recreation, forestry, and other financial factors.

Second, we have a personal reason for our opposition to the pipeline. We own lake front property on First Crow Wing Lake in Hubbard County, MN, near the proposed pipeline route, which we feel will endanger the water quality and adversely impact the environment in this area of the state. For eight decades, four generations of our family have spent summers in this area of Minnesota's lake country and we are fearful that the pipeline's southern route poses a serious risk to the pristine nature of Minnesota's north central lakes and would seriously compromise the safety of the environment that makes the area such a desirable location for our family's legacy.

Third, I presume you are well aware of the allegedly poor environmental record of Enbridge Pipelines, which is a Canadian company. Please don't reward this company for its reportedly poor environmental record.

Fourth, there are alternative routes that are much less potentially dangerous than the southern route. If the

pipeline is deemed as necessary, we urge that the existing northern corridor be used or that the pipeline be routed along existing utility corridors and/or rights of way.

Thank you for this opportunity to lodge our opposition to the southern route of the Sandpiper Pipeline.

Comment on Docket 13 473

To: Minnesota Public Utilities Commission
Greg Nelson, Minnesota DNR Region 1 Director

From: Gerald V. Perkins, Jr. and John R. Perkins, JD.

Re: Citizen comments regarding Docket Number 13-473 for certificate of need and 13-474 for the route permit for the Enbridge Pipelines LLC proposed southern route for the Sandpiper Pipeline

To whom It May Concern:

We oppose the Enbridge Pipelines' proposed southern route for the Sandpiper Pipeline for several reasons.

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- * the existing population in the area,
- * the natural environment,
- * lands of historical, archeological, and cultural significance,
- * local economies supported by agriculture, recreation, forestry, and other financial factors.

Second, we have a personal reason for our opposition to the pipeline. We own lake front property on First Crow Wing Lake in Hubbard County, MN, near the proposed pipeline route, which we feel will endanger the water quality and adversely impact the environment in this area of the state. For eight decades, four generations of our family have spent summers in this area of Minnesota's lake country and we are fearful that the pipeline's southern route poses a serious risk to the pristine nature of Minnesota's north central lakes and would seriously compromise the safety of the environment that makes the area such a desirable location for our family's legacy.

Third, I presume you are well aware of the allegedly poor environmental record of Enbridge Pipelines, which is a Canadian company. Please don't reward this company for its reportedly poor environmental record.

Fourth, there are alternative routes that are much less potentially dangerous than the southern route. If the pipeline is deemed as necessary, we urge that the existing northern corridor be used or that the pipeline be routed along existing utility corridors and/or rights of way.

Thank you for this opportunity to lodge our opposition to the southern route of the Sandpiper Pipeline.

Rice, Robin (PUC)

From: map <matthew.peterson.us.af@gmail.com>
Sent: Tuesday, March 11, 2014 9:05 PM
To: staff, cao (PUC)
Subject: Tar Sands Project

You will not go through with this project, that's an order.

Hartman, Larry (COMM)

From: Steve Peterson <stevetrash@comcast.net>
Sent: Saturday, May 17, 2014 9:51 AM
To: Hartman, Larry (COMM)
Subject: Docket 13-474 - A full EIS should be done on the Sandpiper pipeline

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

5/17/14

Dear Mr. Hartman,

Regarding docket 13-474:

I am concerned the Sandpiper pipeline is being rushed through without adequate analysis – how could a full Environmental Impact Statement be bypassed? I think a full EIS should be done – the route is close to the Mississippi headwaters, crosses the Straight River (MN's #1 trout stream) a couple times and goes through delicate watersheds.

Also, are alternate routes being considered, say straight through to Chicago along highway 94? Anything but where it is, please.

Thank you,

Steve Peterson
Minneapolis and Park Rapids, MN

Rice, Robin (PUC)

From: Steve Peterson <stevetrash@comcast.net>
Sent: Tuesday, March 11, 2014 4:25 PM
To: staff, cao (PUC); Nelson, Greg J (DNR)
Subject: I am opposed to Enbridge Pipelines (North Dakota Pipeline Company) LLC's proposed southern route for the Sandpiper Pipeline

Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147
Re: Enbridge Pipeline Route, Docket Number 13-474

Please forward this email to be appropriately recorded in the docket. Thank you.

Dear Ms. Smetana, Mr. Nelson, and Honorable Commissioners,

I am opposed to Enbridge Pipelines (North Dakota Pipeline Company) LLC's proposed southern route for the Sandpiper Pipeline.

This pipeline comes dangerously close to the headwaters of the Mississippi, too close to population and recreation centers, and threatens fragile ecosystems in its immediate path. The pipeline is not wanted by many people I talk with, but no one knows how to get their opinion heard, especially at these big meetings.

Also, please extend the comment period so more people can participate. You have to know it's not a good sign when you haven't heard from many people.

If the Sandpiper Pipeline is deemed necessary, then Enbridge should be required to route the pipeline through their existing northern corridor, or along existing utility corridors.

Thank you,
Steve Peterson
Park Rapids, MN

Hartman, Larry (COMM)

From: David Piehl <davidpiehl2002@yahoo.com>
Sent: Wednesday, April 30, 2014 10:34 AM
To: staff, cao (PUC); Ek, Scott (PUC); Hartman, Larry (COMM)
Subject: Sandpiper Pipeline project in Hubbard County

Attention Tracy Smetana, Scott Ek, and Larry Hartman,

It has recently come to my attention that a plan has been devised whereby a pipeline will pass through the lakes area of Hubbard county, specifically VERY close to Island and Eagle lakes along highway 71.

I am adamantly OPPOSED to this because it really isn't a question of if there will be leaks, but rather when. Why would we endanger the resource we have in the wetlands, and the Mississippi watershed? This would be very poor policy and should NOT be built. The lakes area needs to be preserved for future generation, and is the primary driver of the economy for Park Rapids and Hubbard Co. This should not be sacrificed for corporate profits.

Please oppose the construction of the pipeline in Hubbard County, and feel free to contact me at this email address or my cell phone, 612-840-6971. I am a property owner in Hubbard County, at Eagle Bay Lodge.

Thank you

David Piehl

Hartman, Larry (COMM)

From: apache@web.lmic.state.mn.us
Sent: Sunday, May 04, 2014 7:53 PM
To: Hartman, Larry (COMM)
Subject: Poehler Sun May 4 19:53:21 2014 PL6668/PPL-13-474

This public comment has been sent via the form at: mn.gov/commerce/energyfacilities/publicComments.html

You are receiving it because you are listed as the contact for this project.

Project Name: Sandpiper Pipeline Project / North Dakota Pipeline Company LLC (NDPC)

Docket number: PL6668/PPL-13-474

User Name: Gaius Poehler

County: Ramsey County

City: St. Paul

Email: gaiuslove@yahoo.com

Phone: 6512716724

Impact: The proposed pipeline violates Ojibwe treaty rights, and puts the land and waters of northern Minnesota at definite risk. The problems from environmental destruction now outnumber the benefits. It is therefore time to replace the Sandpiper and other pipelines with renewable alternative types of energy. We're not only doing this for ourselves, we're doing it for our children. Do you love your children? Enough to do things to save their environment?

Mitigation: Renewable energy

search:https://www.google.com/search?q=Renewable+energy+&oq=Renewable+energy+&aqs=chrome..69i57j0l5.14424j0j8&sourceid=chrome&es_sm=93&ie=UTF-8

Submission date: Sun May 4 19:53:21 2014

This information has also been entered into a centralized database for future analysis.

For questions about the database or the functioning of this tool, contact:

Andrew Koebrick
andrew.koebrick@state.mn.us



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

PUC Docket No. PL-6668/PPL-07-13-474

PLEASE PRINT CLEARLY

Name: Gordon Prickett

Representing: North Lake Assoc

Email: Aitkin County Lakes And

Address: 38639 337 Ln
Aitkin, MN 56431

Tel: Rivers Association
(ACLARA)

gordmett@crosbyirinton.net
7218 927 2267

COMMENTS

• North Dakota Pipeline Co., owned by Enbridge Energy (Lake head prior to 2002) comes from a history of accidents, spills, and leaks.

• Aitkin County is a world-wide bird watching destination. Families come here for the natural beauty, recreation at our lakes, rivers, and woods.

• Disruption across 42 miles in Aitkin County by installing & operating a crude oil pipeline disturbs wildlife and people.

→ PLEASE AVOID THE ORGANIC FARM OF HYNN S. MIZNER at Sect. 30, Logan Twp. in Aitkin Co. On her 138 acres, beside the Willow River, she grows lamb, beef, poultry, & vegetables.

Gordon Prickett, P.E. ACLARA President

Please submit comments at meeting to EERA staff or send to:

→ Larry B. Hartman
Energy Environmental Review and Analysis
Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

Email: larry.hartman@state.mn.us
Toll Free: 800-657-3794
Voice: 651-538-1839
Fax: 651-539-0109

Electronic Submittal: <http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>

»»If mailing, fold along dotted line in sequence noted and tape closed ««

Public Advisor
Erney
Wetzel
Steve
Stanger
John
Larry Hartman
Comm
Planner

Comments Continued:

(First-Fold here)



Gordon Prickett
38639 337th Ln.
Aitkin, MN 56431-2122



04 APR 2014
PM 4 1

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Larry B. Hartman
Energy Environmental Review and Analysis
MN Dept of Commerce
85 7th Place E, Ste 500
St. Paul MN 55101-2198

55101601399



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May 16, 2014

Larry Hartman, Environmental Review Manager
Minnesota Dept of Commerce
85 7th Pl E, Suite 500
St Paul, MN 55101

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MAY 27 2014

MAILROOM

Docket # 13-474

Dear Mr. Hartman,

I request that the permit for Enbridge's Sandpaper Pipeline in Minnesota be denied. There has been no Environmental Impact Statement despite the fact that a spill of fracked Bakken oil would clearly devastate pristine lakes, rivers, and aquifers as well as land, all in an area that currently supports 49,000 jobs and generates \$7.2 billion per year. The spill in Kalamazoo, Michigan continued for 17 hours before being stopped, it has still not been cleaned up to pre-spill conditions, and health consequences for those in the vicinity are still being revealed. Enbridge may promise to monitor its pipelines closely, but its track record of over 800 spills in the past decade does not speak well for its construction methods or monitoring effectiveness. As we have seen far too much recently, spills and derailments involving Bakken oil can be deadly.

Who stands to benefit from this pipeline? Only Enbridge—certainly not the people of Minnesota. Certainly not the waters and lands of this beautiful state. Who stands to lose when there is a spill? Everyone: people, water, land, animals. It is not in the environmental or economic interest of Minnesota to permit a pipeline to cross through this state. After meeting with ~~members~~ ^{residents} of the White Earth Reservation, I am convinced that this pipeline is a dangerous and reckless plan that disregards the rights and needs of all who live along the proposed route. Please reject the permit.

Thank you for your attention to this matter. I look forward to your response.

Sincerely,

Meighan Pritchard
Minister for Environmental Justice
United Church of Christ

102 W Boston St
Seattle, WA 98119
206-370-4142

pritchardm@ucc.org

April 16, 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

Reference: Public Utilities Commission Docket Number: PL-6668/PPL-13-474

Mr. Hartman;

I have written a Letter to the Editors of area papers and also addressed Congressman Nolan and MSNBC's Ed Schultz to draw attention to the economic potential for the Lakes region as a result of the North Dakota oil boom and the associated concern with the proposed Sandpiper pipeline impact on the environment.

The Friends of the Headwaters (FOH), centered in Park Rapids, has become very active in opposition to the proposed route and would ask the PUC perform a detailed environmental analysis of the Sandpiper Southern Route Location and present a clear statement of the public risk. Additionally, ask the PUC that they consider the alternate routes as presented by FOH. More information can be obtained from the FOH website.

My letter is enclosed.

Respectfully, Lee Purrier
820 Woodland Ave
Park Rapids, MN 56470
Home: 218-366-2034
Cell: 858-748-1822



RECEIVED

APR 18 2014

MAILROOM

to bring this issue to National attention as he did with the Keystone XL analysis. We also invite you to come over to Park Rapids and meet with both sides of the issue.

Ed;

Your excellent coverage of the Keystone XL pipeline issues beginning with your early support followed by more rigorous evaluation by actually going to Nebraska and talking to those most affected led to your much appreciated fact based opposition.

There is another proposed pipeline in your Lakes Country backyard that needs similar attention. The Sandpiper pipeline is designed to carry Bakken crude from North Dakota thru the pristine Lakes Region from Itasca down past Park Rapids and heading East to Superior, Wisconsin.

This pipeline is strongly opposed by the tribal communities and many residents living on or near the Lakes and Rivers in this area. There is a very active group, Friends of the Headwaters, who are leading the opposition by digging into all environmental concerns and history of Enbridge's pipeline leaks and their effects on similar regions. Your team can obtain the latest information regarding this project on the Friends of the Headwaters Facebook or thru most Search engines.

Water is our gold in this region. We need your help. When you broadcast from Detroit Lakes it would be a golden opportunity to bring this equally important pipeline issue to the attention of your audience.

Thank you for your work on these critical issues.

Lee Purrier
820 Woodland Ave
Park Rapids, MN 56470
Home: 366-2034
Cell: 858-748-1822