



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

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

PLEASE PRINT CLEARLY

Name: Brad Hageman

Representing: Land Stewards of MN

Email: bradhageman@aol.com

Address: 11861 Hwy 25 NE
Foley, MN
56329

Tel: 320-387-3071

COMMENTS

1/2 mile
like mine

Hello Larry, thank you for addressing me at the McGregor meeting by introducing yourself. If all the meetings went as the McGregor one and we had control this pipeline would not happen! Sad to say it probably will. Please ✓ the Soo Line Trail. I don't agree with their findings. I'm starting to believe they have stock in the pipe being made with all the zig-zags instead of a straight shot. All land that is that close with direct drainage to the Sandy River/Drainage Ditch should be off limits. They ruined it back in the 30's according to my Grand father when it was dug. Lets not ruin it further with this pipeline. I've only looked at a small section and am be-

fuddled with its layout. Can we not go through past or the roads at U.S. Steels 7,000 acres by Palisade? Formerly Thompson Fields.

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 ««

I have ponds that I love and big plans to link all together. Please don't allow this to happen. ::

Comments Continued:

I have an 1 1/2 acre lot I broke off from my ^{80^{acre}} property to sell. Will I be compensated now that they are ruining 1/3 of it for development? Who will buy it now with the easement? A church offered \$40,000, I wanted 50. My retirement home is going right on the proposed easement. I have planned this for 40 years! Trees have been groomed for 20 years. Just look at old aerial photo graphs.

(First-Fold here) My property value will be less. Who decides? Tax abatement.

BRAD OR ALECIA A. HAGEMAN
11861 HWY. 25 N.
TOLEY, MN 56329

Tape here
MINNEAPOLIS MN 554

17 MAR 2014 PM 9 L



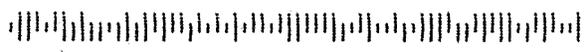
Justice
DEPT OF JUSTICE

RECEIVED
MAR 19 2014

MAILROOM

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

5510186013

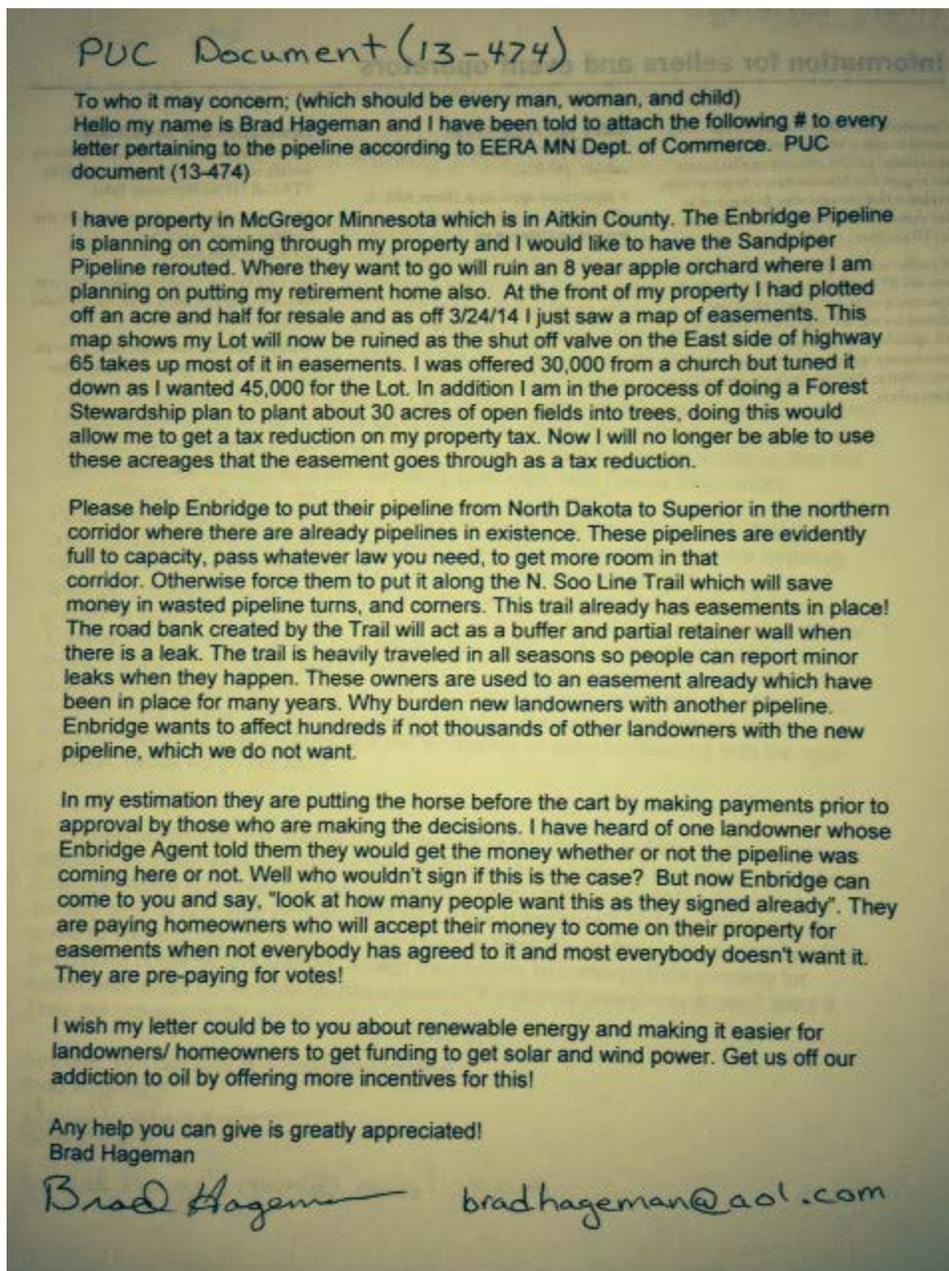


(Second-Fold here)

From: [Brad H](#)
To: [Nelson, Casey \(COMM\)](#)
Subject: doc. (13-474)
Date: Monday, March 24, 2014 11:38:46 AM

Subject: Pic doc. (13-474)

Sorry if this looks familiar but there is new information written down as of today that I didn't realize on the easements and my property. Please read and respond, thank you.



Sent from my iPhone

From: [Brad H](#)
To: Sen.Carrie.Ruud@senate.mn
Cc: [RUSS HAGEMAN](#)
Subject: Enbridge sandpiper Pipeline
Date: Monday, March 17, 2014 7:57:43 PM

PUC Docket number 13-474

Please..... Do all you can to get the Enbridge Sandpiper Pipeline either put into the northern corridor where they already have pipelines even if it is full. Or make Enbridge use the Soo Line Trail , not my property and others. I want to build my retirement home right where they are bringing the pipeline. They will ruin my apple orchard. And my 50 foot pine tree that I've watched grow for 50 years and dreamed that someday would end up at the White House for Christmas all decorated and my Deerstand of 40 years. I will be sending a letter that I believe you have received from other people affected by the pipeline.
Brad Hageman Foley Minnesota owns property north of McGregor 2 miles on Hwy. 65

Sent from my iPhone

From: [Hartman, Larry \(COMM\)](#)
To: [Nelson, Casey \(COMM\)](#)
Subject: FW: District 10 Newsletter
Date: Friday, March 28, 2014 4:59:01 PM

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

larry.hartman@state.mn.us

Phone: 651-539-1839

800-657-3794

Fax: 651-539-0109

Cell: 612-210-4810

mn.gov/commerce/energy/facilities

From: Brad H [mailto:bradhageman@aol.com]
Sent: Monday, March 17, 2014 8:17 PM
To: Sen.Carrie.Ruud@senate.mn; Hartman, Larry (COMM); Nelson, Casey (COMM); sandpiperproject@enbridge.com
Cc: staff, cao (PUC); Ek, Scott (PUC)
Subject: Fwd: District 10 Newsletter

PUC document 13-474

The letter below was from another person who does not want the pipeline. I am with her thinking. My private letter follows please read all the way through.

Subject: Re: District 10 Newsletter

Good afternoon, Senator. I have many questions and did have an opportunity to ask a number of them at the meeting. It was very well attended, and local people had an opportunity to ask questions and (for the most part) received some kind of answers. the Aitkin Independent Age will be running an article on the meeting in tomorrow's paper.

The elephant in the room was why, when pretty much everyone thinks this public infrastructure should be located on public land as much as possible, Enbridge is categorically refusing to use the Soo Line right of way to locate this pipeline. I guess we will see if the Public Utilities Commission is responsive to public will in this. As you know, many of the counties are willing to have the pipeline

follow the Soo Line trail, and it would avoid unwanted impacts to private lands.

I look forward to hearing how you are able to support your constituents in this.

Brad Hageman

I own land in McGregor Minnesota. The Pipeline is wanting to come through a quarter-mile of my property this will affect my property. I have an acre and half lot off my 80 to sell and now one 10th of that will no longer be able to be sold or used by whoever buys it and it will ruin my property value. I was doing a forest stewardship program where I was going to plant trees they give me money back on tax abatements for doing this now those acres that the pipeline will be taking up will probably not fall under the program costing me money for life.

From: [Hartman, Larry \(COMM\)](#)
To: [Nelson, Casey \(COMM\)](#)
Subject: FW: Sent to senators
Date: Friday, March 28, 2014 4:36:46 PM

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

larry.hartman@state.mn.us
Phone: 651-539-1839
800-657-3794
Fax: 651-539-0109
Cell: 612-210-4810
mn.gov/commerce/energy/facilities

-----Original Message-----

From: Brad H [<mailto:bradhageman@aol.com>]
Sent: Thursday, March 20, 2014 12:51 PM
To: Hartman, Larry (COMM); sandpiperproject@enbridge.com
Subject: Sent to senators

Hello my name is Brad Hageman.

I have property in McGregor Minnesota which is in Aitkin County. The Enbridge Pipeline is planning on coming through my property and I would like to have it rerouted. Where they want to go will ruin an apple orchard where I am planning on putting my retirement home. Also, a lot that I plotted off the front of my property for resale will now be ruined. In addition I was doing a Forest Stewardship plan to plant my 30 acres of open fields into trees, doing this would allow me to get a tax reduction on my property tax. Now I will no longer be able to use these acreages that the easement goes through.

Please help Enbridge fight to put their pipeline from North Dakota to Superior in the northern corridor where there are already pipelines in existence. These pipelines are evidently full to capacity, pass whatever law you need to get more room in that corridor.

Otherwise force them to put it along the Soo Line Trail which will save money in wasted pipeline turns, and corners. This trail already has easements in place. What they want to do will affect hundreds if not thousands of other landowners with the new pipeline we do not want.

I wish my letter could be to you about renewable energy and making it easier for landowners/homeowners to get funding to get solar and wind power. Get us off our addiction to oil.

In my estimation they are putting the horse before the cart. They are paying homeowners who will accept their money to come on their property for easements when not everybody has agreed to it and most everybody doesn't want it.

Any help you can give is greatly appreciated!

Brad
bradhageman@aol.com
320-293-4663

Sent from my iPhone

From: bradhageman@aol.com
To: [Hartman, Larry \(COMM\)](#)
Subject: PUC Docket Number (13-474) Enbridge Pipeline
Date: Monday, February 10, 2014 11:34:50 AM
Attachments: [letter_of_defiance.docx](#)

Dear Mr. Hartman, please look over my attached letter about Enbridge Sandpiper Pipeline proposed route. I would like to propose an alternative route and or ask for a segment alteration to where the pipeline will go under Hwy 65 North of McGregor 2 miles. I hope this is made public. Is this Sandpiper Pipeline a done deal?

Brad Hageman

bradhageman@aol.com

To Whom It May Concern; unless Enbridge is giving away ridiculous amounts of money for coming through my property, I am not interested in the Sandpiper Pipeline and will fight it tooth and nail.

I will say it again to you as I have published in local papers from day one. If this is going to happen regardless of what is right, smart, and Earth Friendly then, WHY DON'T THEY USE THE SOO LINE TRAIL as their route? The existing right of ways are there and those owners are already used to the traffic of summer and winter recreation and God forbid, if there are leaks they would be noticed right away due to the traffic. I plan on retiring on my land in 10 years and have been planting and grooming my property for this. The route they want will disturb my apple orchard that was planted 8 years ago. I am also doing a forest stewardship program and planting this summer the whole area they want to go through is where I am planting trees. My hunting season was ruined as their surveyors traipsed all over our hunting area right up to, into, and after the season. My property is a High Consequence Area (HCA) as my property is ½ a mile from the Sandy River with my hills draining directly to the swamp which is part of the Sandy Lake /River Watershed. I tried digging ponds and was told not to go deeper than 5' as this would alter the water table and I can tell you in many areas of my property there is a layer of clay two feet below the surface and it is 1 to 2 feet deep and then sand. The pipeline will probably alter the wetland as they are sure to be lower than this.

As a contractor it is ironic that just a few weeks back I got a publication for Pipeline Safety that shows how to respond to an oil spill that shows horrific damage to the property and surrounding environment. Dead vegetation, vapor cloud, liquid in the ground that goes unnoticed for weeks leaching in and around, rainbow sheen, mud or water bubbling up, and fire or explosion would really suck in my pristine part of my world.

http://www.huffingtonpost.com/2013/10/10/north-dakota-oil-spill-tesoro_n_4079323.html shows an oil spill that was caught by a N.D. farmer because he was out there combining. Any other time and much more devastation would have resulted. Mayflower, Arkansas also. I think we need to put our time into renewable energy sources not fossil fuels. All this pipeline will do is further our problems while making the oil/ gas companies richer. I don't want this pipeline, it is not a good choice for my backyard or the Earth!

Brad Hageman

13-474

Rice, Robin (PUC)

From: Brad H <bradhageman@aol.com>
Sent: Friday, March 21, 2014 12:40 PM
To: staff, cao (PUC)
Subject: Enbridge pipeline

Hello my name is Brad Hageman.

I have property in McGregor Minnesota which is in Aitkin County. The Enbridge Pipeline is planning on coming through my property and I would like to have it rerouted. Where they want to go will ruin an apple orchard where I am planning on putting my retirement home. Also, a lot that I plotted off the front of my property for resale will now be ruined. In addition I was doing a Forest Stewardship plan to plant my 30 acres of open fields into trees, doing this would allow me to get a tax reduction on my property tax. Now I will no longer be able to use these acreages that the easement goes through.

Please help Enbridge fight to put their pipeline from North Dakota to Superior in the northern corridor where there are already pipelines in existence. These pipelines are evidently full to capacity, pass whatever law you need to to get more room in that corridor.

Otherwise force them to put it along the Soo Line Trail which will save money in wasted pipeline turns, and corners. This trail already has easements in place. What they want to do will affect hundreds if not thousands of other landowners with the new pipeline we do not want.

I wish my letter could be to you about renewable energy and making it easier for landowners/homeowners to get funding to get solar and wind power. Get us off our addiction to oil.

In my estimation they are putting the horse before the cart. They are paying homeowners who will accept their money to come on their property for easements when not everybody has agreed to it and most everybody doesn't want it.

Any help you can give is greatly appreciated!

Brad

bradhageman@aol.com

[320-293-4663](tel:320-293-4663)

Sent from my iPhone

RECEIVED
MAR 21 2014

13-474

MINNESOTA PUBLIC UTILITIES COMMISSION

To who it may concern; (which should be every man, woman, and child)

Hello my name is Brad Hageman and I have been told to attach the following # to every letter pertaining to the pipeline according to EERA MN Dept. of Commerce. PUC document (13-474)

I have property in McGregor Minnesota which is in Aitkin County. The Enbridge Pipeline is planning on coming through my property and I would like to have the Sandpiper Pipeline rerouted. Where they want to go will ruin an 8 year apple orchard where I am planning on putting my retirement home also. An acre and a half off the front of my property I had plotted off for resale will now be ruined. In addition I am in the process of doing a Forest Stewardship plan to plant my 30 acres of open fields into trees, doing this would allow me to get a tax reduction on my property tax. Now I will no longer be able to use these acreages that the easement goes through as a tax reduction.

Please help Enbridge to put their pipeline from North Dakota to Superior in the northern corridor where there are already pipelines in existence. These pipelines are evidently full to capacity, pass whatever law you need, to get more room in that corridor. Otherwise force them to put it along the N. Soo Line Trail which will save money in wasted pipeline turns, and corners. This trail already has easements in place! The road bank created by the Trail will act as a buffer and partial retainer wall when there is a leak. The trail is heavily traveled in all seasons so people can report minor leaks when they happen. These owners are used to an easement already which have been in place for many years. Why burden new landowners with another pipeline. Enbridge wants to affect hundreds if not thousands of other landowners with the new pipeline, which we do not want.

In my estimation they are putting the horse before the cart by making payments prior to approval by those who are making the decisions. I have heard of one landowner whose Enbridge Agent told them they would get the money whether or not the pipeline was coming here or not. Well who wouldn't sign if this is the case? But now Enbridge can come to you and say, "look at how many people want this as they signed already". They are paying homeowners who will accept their money to come on their property for easements when not everybody has agreed to it and most everybody doesn't want it. They are pre-paying for votes!

I wish my letter could be to you about renewable energy and making it easier for landowners/ homeowners to get funding to get solar and wind power. Get us off our addiction to oil by offering more incentives for this!

Any help you can give is greatly appreciated!

Brad Hageman
Brad Hageman
320-293-4663

bradhageman@aol.com

From: [Brad H](#)
To: [Lynn Sue Mizner](#); [Ek, Scott \(PUC\)](#); [Hartman, Larry \(COMM\)](#); [Nelson, Casey \(COMM\)](#);
[Sen.Carrie.Ruud@senate.mn](#); [Senator Al Franken](#); [staff_cao \(PUC\)](#); [sandpiperproject@enbridge.com](#)
Subject: Pipeline Communication
Date: Monday, March 31, 2014 5:50:36 PM

Because I have not heard anything from Enbridge Sandpiper Pipeline Lorraine Little or others, I have started to contact as many people as I can who might help to reroute or stop the Sandpiper Pipeline.

My property is very valuable to me, my family, friends, and relations.

I plan on doing whatever I can to maintain it's current state of being.

Below is a letter from Vicky Munson of Sierra Club. I encourage others to send letters to her and our state representatives, anyone you can think of who might help.

Brad Hageman

Begin forwarded message:

From: Vicki Munson <vicki.munson@sierraclub.org>
Date: March 31, 2014 at 3:43:06 PM CDT
To: bradhageman@aol.com
Subject: Re: Pipelines

Greetings Brad :-) Thanks for your message. The Sierra Club in Minnesota is watching with interest the pipeline developments that are being proposed to cross our state. The campaign is developing, though I don't see anything published about it on our website yet. I see that there is a Beyond Oil Campaign kick-off meeting tonight. I may have more information for you in the near future. - vic

On Fri, Mar 14, 2014 at 2:45 PM, SierraClub Information
<information@sierraclub.org> wrote:

----- Forwarded message -----

From: Brad H <bradhageman@aol.com>
Date: Thu, Mar 13, 2014 at 6:24 PM
Subject: Pipelines
To: "information@sierraclub.org" <information@sierraclub.org>

Can any help come to us here in Minnesota? They're (Sandpiper Pipeline) trying to put a 30 inch pipeline from North Dakota to Superior Wisconsin. I was at a meeting today where many people voiced their opinions against the pipeline.

We do not want it, and it is being forced upon us. I will probably lose my hill where I want to put my retirement home as they are proposing to come right through my area with a 150 foot easement. Please help!

Good luck with the pipeline from Alberta Sands down to the Gulf of Mexico.

Sent from my iPhone

--

Vicki Munson
Chapter Coordinator
Sierra Club North Star Chapter
2327 E Franklin Av #1
Minneapolis MN 55406
(612)659-9124 ext. 301
www.northstar.sierraclub.org

From: Dan Hamann [mailto:Dan.Hamann@spectrum-fs.com]

Sent: Tuesday, February 25, 2014 10:53 AM

To: Hartman, Larry (COMM)

Subject: Sandpiper Pipeline

I am a property owner in Park Rapids, MN. I am generally in favor of routing the proposed Enbridge Sandpiper pipeline through Hubbard County. I believe pipelines are the safest way to transport petroleum products, as opposed to rail or truck. I think this would create jobs in the local area, and help to develop our national self-sufficiency in oil by allowing a direct pipeline from the Bakken Shale to the Great Lakes.

Dan Hamann

9290 W. Dodge Rd., Suite 203

Omaha, NE 68114

From: Erik Hansen [mailto:ehansen@sterlingcollege.edu]
Sent: Monday, March 31, 2014 11:04 AM
To: Hartman, Larry (COMM)
Cc: margaret sorensen
Subject: Docket Number 13-474 Sandpiper pipeline

Dear Mr. Hartman,

I am writing to oppose the construction of the so-called Sandpiper pipeline through North Central Minnesota.

While I now live in Vermont, I was born and educated in the state, with undergrad and graduate degrees from the University of Minnesota. I vacation annually back in the Minnesota and, in my recent retirement, am contemplating moving back to my home state.

I strongly encourage putting a stop to any pipeline transporting fossil fuels through Minnesota. It is time we stop our addiction to oil. The best way to do that is simply to say "no". This will also encourage further development of renewable energy sources such as solar and wind.

For many years I led study-abroad programs from Sterling College in upstate Vermont to Scandinavia and Japan. During these field programs we looked at many projects demonstrating the wisdom of sustainable development. Repeatedly I was encouraged that it really is possible to wean ourselves off our dependence on fossil fuel. It can be done. Let's begin now by opposing construction of this pipeline. And let's allow the headwaters of the Mississippi River remain sacred forever.

Sincerely yours,

Erik S. Hansen
Sterling College
Dean of Work, Retired

From: Mary Claire Hansen [mailto:hmaryclaire@gmail.com]

Sent: Wednesday, March 19, 2014 7:11 PM

To: Hartman, Larry (COMM)

Subject: I am disheartened to hear of any type or kind of pipeline going through our Itasca State Park as well as through our clean streams and rivers. This is a disgrace to our environment so even consider this. There are other ways and other pipelines that co...

Re: Location of Sandpiper pipeline

Larry Hartman
Minnesota Dept. of Commerce
85 7thPlace East, Suite 500
St. Paul, MN, 55101
ATTN: PPL-13-474

I am concerned about the location of the proposed route of the Sandpiper pipeline, namely, through good farmland, which is scarce in northeastern Minnesota, and more particularly, intensively farmed, organically certified land. I know personally how much time and work is involved in building the fertility and doing all the things necessary to obtaining organic certification. I did this type of farming for a number of years. (My husband and I were among the earliest organic growers in Minnesota). At age 88 that is long behind me, but I certainly know the value of such land.

I think every effort should be made to find a route further north of the proposed one. I think there are alternatives where such valuable and irreplaceable farm land would not be destroyed. This is important to a large community which is dependent upon this source of locally grown food.

Mary Alice Harvey
Mary Alice Harvey

801 E. 2nd St., Apt. 213, Duluth, Mn. 55805

RECEIVED

APR 03 2014

MAILROOM

Mary Alice Harvey
801 E. 2nd St., Apt. 213
Duluth, MN 55805-2169



DULUTH MN 55805



Larry Hartman
Mn. Dept. of Commerce
85 7th Place East, Suite 500,
St. Paul, MN 55101

PP1-13-474

POSTNET
55101

From: Jim Hawley [mailto:jjhawley@frontiernet.net]
Sent: Sunday, March 16, 2014 12:09 PM
To: Hartman, Larry (COMM)
Subject: Docket Number PL-6668/PPL-13-474 -- Comments Attached re: Sandpiper Pipeline Route

Mr. Hartman -

Attached in the Word document below are our comments on the Sandpiper Pipeline Route.
Please let us know if you have any issues opening the attachment.

Thanks.

Jim and Judy Hawley
51976 209th Place
McGregor, MN 55760
Home: 218-426-4476
Cell: 651-247-1332
jjhawley@frontiernet.net

March 16, 2014

State of Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Public Utilities Commission (PUC) Docket Number: PL-6668/PPL-13-474
Regarding the Sandpiper Pipeline Route

Dear Commissioners:

The construction and placement of a petroleum pipeline is a complex situation, with many facets. All other things being equal, we believe few would ever elect to have a pipeline going through their back yard.

In order to have access to these resources, someone will have to be near to their delivery, whether that delivery is by rail, truck, or pipeline.

As we discussed the Sandpiper project, we distilled the issue to one of risk. The relationship of the Big Sandy Lake Watershed and the viability of the McGregor area community at-large is inseparable. We have the example of the 2012 Big Sandy Lake Watershed flooding to evidence the loss of business, and businesses, and people deciding to leave the area.

If, more likely when, the local environment is damaged by an oil spill, certainly specific individuals will be affected. Furthermore, if the watershed and lakes area are damaged, the entire community will be negatively affected:

- tourism will decline, impacting local businesses and, thus, families choosing to reside in the area
- property values will decline, lowering the property tax base and, thus, negatively affecting school district and community infrastructure
- immeasurable declines will occur in the area's quality of life

Looking at the pipeline routing question from a risk management perspective, we believe a pipeline in the area is close to a pure risk. If there is a leak, the adverse effect has the potential to be devastating to the area. The gain that the community receives in the form of property taxes and temporary employment gains would be more than offset by the damages outlined above.

So, when faced with a question of risk there are actions that can be taken to manage it. First, you avoid it. Second, you try to reduce it. Third, you decide to absorb it in full. Fourth, you try to mitigate it in some fashion.

If Sandpiper goes through as proposed, the risk cannot be avoided. The risk is reduced through all the actions taken by Enbridge in their quality and continuous improvement initiatives. But, parts wear out, acts of nature occur, human beings make mistakes. We have personal experience in the manufacturing of implants that go into the human body, surgical instrumentation, and pharmaceutical manufacturing. Our companies pursued all the initiatives in their manufacture that go into quality and continuous improvement, including satisfying the FDA, ISO 9000, Baldrige Quality Award criteria, etc., and guess what, errors still occurred. Equipment can fail, notwithstanding preventive maintenance protocols. People make mistakes, notwithstanding supervision and training. The community and its residents are very limited as far as being able to mitigate the risk of a pipeline spill, notwithstanding potential financial remuneration described by Enbridge.

So, we're left with the opportunity to mitigate the risk via the route the pipeline takes.

The existing Northern Route is described by Enbridge as untenable. Based on their Minnesota Environmental Information Report (the Report) and comments made at the March 13 public information meeting in McGregor, it is difficult to discern whether the Northern Route is truly untenable, or just more difficult than they care to pursue or invest in.

We would point out that each route other than Sandpiper is described in the Report as either "... would have met the project objective ..." or "... would meet the project objective ..."

Clear to us is that the Sandpiper or Soo Line Routes represent the most onerous alternatives due to where they cross the watershed and the community. While the risk of loss cannot be measured precisely, the proximity of these routes to the lakes, particularly Big Sandy – which is the watershed's funnel to the Mississippi River – and city of McGregor creates, from a common sense perspective, the greatest loss potential. The Aitkin Powerline Route will hit the watershed further east, providing for distance, and thus time, to respond if a leak were to occur. That said, we reject Enbridge's assertion that the Aitkin Powerline Route "... did not convey a significant environmental advantage over the preferred route" when one considers both the quantitative and qualitative adverse effect on the total environment incorporating the damages referred to above.

The Allete Powerline Route was rejected for reasons that it would seem the company could mitigate, such as construction and safety risks, and limited access. Winter construction issues would seem to represent costs to be incurred if one is in the business of building and installing pipelines. If one of the reasons making the Northern Route less viable is proximity to population centers; then it would follow a factor in favor of the Allete Powerline Route would be the avoidance of the population centers in the McGregor area.

So, in conclusion, for the reasons presented above, we believe that either the Northern Route or the Allete Powerline Route is significantly preferable to Sandpiper, and Soo Line or Aitkin Powerline Routes, when one considers the potential adverse effect on the Big Sandy Lake Watershed or McGregor area community at-large.

Thank you for your consideration of these comments. Please feel free to contact us with any questions.

James C. and Judy A. Hawley
51976 209th Place
McGregor, Minnesota 55760
jjhawley@frontiernet.net

**Paul and Elizabeth Heck
1173 Sunset Hill Road
Outing, MN 56002**

**Larry Hartman
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101**

**Date: April 3, 2014
Re: Sandpiper Pipeline ppl-13-474**

Mr. Hartman,

We have serious concerns over the preferred southern routing of the Sandpiper Pipeline and the proximity to both Lake Roosevelt and the Spire Valley Hatchery. In no way should a pipeline be routed near critical and valuable habitats or recreational features. The proposed route winds around the west and north end of Lake Roosevelt, a popular recreational lake with a large number of permanent and seasonal residents. Any spill in this area would drain directly in to the lake with devastating results. The area where the pipeline continues to the east also drains directly into Lake Roosevelt. The odds of having a spill reach this high tax value lake are unacceptable.

The Spire Valley Hatchery is adjacent to the proposed pipeline route directly to the north of Lake Roosevelt. This Minnesota DNR hatchery is valued for producing steelhead and Kamloops rainbow trout. Again, a spill here would be devastating and far reaching beyond this immediate community. This area also includes two sites of historic cultural significance; and old logging camp and a historic hunting community.

We feel strongly that Enbridge should take the responsibility and initiative to route the pipeline to avoid these treasured areas. We also believe it is imperative for Enbridge to absolutely increase its safety practices across all pipeline routes.

Thank you for the opportunity to comment on this project

Elizabeth and Paul Heck, JD

From: Kathy Herbranson [mailto:kgherbranson@gmail.com]
Sent: Friday, April 04, 2014 10:40 AM
To: Hartman, Larry (COMM)
Subject: PUC Docket No. PL-6668/PPL-07-13-474

Mr. Hartman,

We are sending comments on PUC Docket No. PL-6668/PPL-07-13-474 for submission, since the link provided at the McGregor public meeting is not operational (<http://mn.gov/commerce/energyfacilities/publicComments.html?projectId=33599>). in addition to comments an article from the LA Times is being included for submission.

Thank you for submission of these comments.

Gary and Kathy Herbranson

April 2, 2014

North Dakota Pipeline Company LLC Sandpiper Pipeline Project
PUC Docket Number: PL-6668/PPL-07-13-474 or PL-6668/PPL-13-474
(different numbers on information received at McGregor meeting)

COMMENTS

Dear Minnesota Public Utilities Commission,

After attending a public information meeting in McGregor, MN regarding the Sandpiper Pipeline Route to gain information, several concerns regarding this pipeline were raised for us. We urge you to deny the route request for the southern Sandpiper route.

In Aitkin County, the Big Sandy Lake Watershed encompasses over 420 square miles and the county contains the most miles of the Mississippi River in the entire US. There are exceptional wetlands, swamps and bogs in this area, which makes the pipeline invasive to critical habitat in this area, along with a significant negative impact in the event of a spill. The major industry in this area is the land; for farming, logging, fishing and recreation/tourism. Industry does not bring people to this area for jobs, rather the majority of jobs created are through entrepreneurship supported by tourism/recreation. As demonstrated in a flood of the area in recent years, several businesses were not able to survive, due to the nature of the economy. In the event of a spill, the negative effects to the area and county would most likely be multiplied.

One of the criteria is to use existing right of ways, which Enbridge already has access to with its northern route. It seems if Enbridge is trying to determine a new corridor, which would provide access for more than one line without much public awareness.

By trying to reroute their pipeline, Enbridge avoids having to request approval from the tribal and federal entities affected by the existing pipeline route. It's apparent that is *for the convenience of Enbridge* -- not for the good of our state -- Enbridge would rather skip the trouble of dealing with the tribal and federal governments, and instead run the pipeline through eight state forests, three state wildlife management areas, a national hiking trail, and miles upon miles of a large watershed that empties into one of the largest and most popular lakes in Minnesota -- Big Sandy Lake -- which outlets into the Mississippi River.

According to an article on August 18, 2012 by Matt Pearce Neela Banerjee of the Los Angeles Times, “A major rival to the controversial Keystone XL oil pipeline project is vastly boosting its U.S. pipeline system, but it's avoiding the same scrutiny that federal regulators, environmentalists and landowners are giving Keystone owner TransCanada Corp. Enbridge Inc. is proceeding largely unencumbered with plans to spend \$8.8 billion in the U.S. to transport greater volumes of petroleum to the Gulf Coast and other markets than TransCanada would with its Keystone XL pipeline project from Alberta, Canada, to the Gulf Coast. Rather than building a single new pipeline, Enbridge is replacing smaller, existing pipeline with bigger pipes, adding pumping capacity and installing new supply lines alongside existing ones. The Calgary, Alberta, energy pipeline and storage company is forging ahead even though it has been bedeviled recently by high-profile oil spills. TransCanada's Keystone XL plan, and its additional 830,000 barrels a day, snagged on the so-called presidential permit process, in which the State Department conducts environmental and other reviews of infrastructure projects that cross American borders. But Enbridge, which runs the longest pipeline system in Canada and the U.S., can proceed without new presidential permits — and the rigorous review they bring — because the company already has permits from the initial construction years ago and because the physical work will take place in the United States.

*We can increase the capacity crossing the border by anywhere from 800,000 barrels a day to 1 million barrels a day without the need for a new presidential permit," Steve Wuori, president of the company's liquid pipeline division, said during a March 7 investor conference call. **The task of determining the safety or wisdom of Enbridge pipeline routes falls on a patchwork of local, county and state jurisdictions through the Midwest and East, most of which lack intensive pipeline expertise.***" The article in its entirety is attached.

According to information provided, the pipeline is designed to bring 225,000 barrels of oil per day into an expanded terminal at Clearbrook, MN, and 375,000 barrels of oil per day from there to Superior. Where do the extra 150,000 barrels of oil per day come from? Is this route being proposed to accommodate the oil from Canada? Is it worth the risk to our environment, when Enbridge's track record with oil spills seems to be the worst on record?

Minnesota Statute 116D.02 subdivision 2 states that it is the State's responsibility to: *"(10) preserve important existing natural habitats of rare and endangered species of plants, wildlife, and fish, and provide for the wise use of our remaining areas of natural habitation, including necessary protective measures where appropriate..."*

Please, limit the number of pipelines passing through Minnesota. Deny this re-route, and have Enbridge use its existing pipeline route, in order to follow the above statute. If this pipeline is approved without an environmental impact assessment, Enbridge will have established infrastructure, environmental protocol and the market connections it needs to install more pipelines in this corridor in the future. Enbridge will have been able to avoid the scrutiny of federal regulators and the impact on the MN environment.

The public comment period was short and the public meetings were held during a time frame in which seasonal residents were either not able to take part in the process or even aware of the pipeline route, it seems the "public information" process has provided for limited public involvement on such an important topic that affects all Minnesotans.

Sincerely,

Gary and Kathy Herbranson
49899 210th Place
McGregor, MN 55760
218-426-4565
email: kgherbranson@gmail.com

Keystone XL rival Enbridge avoids scrutiny of oil pipeline plans

Enbridge is proceeding largely unencumbered with plans to spend \$8.8 billion in the U.S. to send greater volumes of oil to the Gulf Coast and other markets.

August 18, 2012 | By Matt Pearce and Neela Banerjee, Los Angeles Times

ANN ARBOR, Mich. — A major rival to the controversial Keystone XL oil pipeline project is vastly boosting its U.S. pipeline system, but it's avoiding the same scrutiny that federal regulators, environmentalists and landowners are giving Keystone owner TransCanada Corp. Enbridge Inc. is proceeding largely unencumbered with plans to spend \$8.8 billion in the U.S. to transport greater volumes of petroleum to the Gulf Coast and other markets than TransCanada would with its Keystone XL pipeline project from Alberta, Canada, to the Gulf Coast.

Rather than building a single new pipeline, Enbridge is replacing smaller, existing pipeline with bigger pipes, adding pumping capacity and installing new supply lines alongside existing ones.

The Calgary, Alberta, energy pipeline and storage company is forging ahead even though it has been bedeviled recently by high-profile oil spills.

TransCanada's Keystone XL plan, and its additional 830,000 barrels a day, snagged on the so-called presidential permit process, in which the State Department conducts environmental and other reviews of infrastructure projects that cross American borders.

But Enbridge, which runs the longest pipeline system in Canada and the U.S., can proceed without new presidential permits — and the rigorous review they bring — because the company already has permits from the initial construction years ago and because the physical work will take place in the United States.

"We can increase the capacity crossing the border by anywhere from 800,000 barrels a day to 1 million barrels a day without the need for a new presidential permit," Steve Wuori, president of the company's liquid pipeline division, said during a March 7 investor conference call.

"And I think that's very important in the politically charged environment in which we find ourselves," he said.

The task of determining the safety or wisdom of Enbridge pipeline routes falls on a patchwork of local, county and state jurisdictions through the Midwest and East, most of which lack intensive pipeline expertise.

"All these companies are going, 'How are we going to get oil from Canada to U.S. refineries without this mess? How do we avoid the political issues?'" said Brigham A. McCown, former head of the top federal pipeline regulator and attorney of international energy transportation law.

"And the answer is, find an existing pipeline that crosses the border and add capacity to that pipeline. It's no different from taking a two-lane road and turning it into a four-lane highway."

Enbridge, which earned nearly \$1 billion last year, has not attracted the national attention of the Keystone XL project largely because of the piecemeal — and still early — nature of its upgrades. Only a few environmental groups have raised alarms thus far.

Yet some of the projects would be significant.

The company aims to build a larger line alongside its pipeline from Flanagan, Ill., to Cushing, Okla.; add a line alongside a newly acquired pipeline that runs from Cushing to the Texas Gulf Coast, a project that it's splitting with another pipeline company; and increase the capacity of a line from northwest Indiana through Michigan. Smaller projects are planned as well. Most of the changes are expected to be finished in 2014. Once completed, they would push an additional 310,000 barrels a day through Michigan toward Ontario and take 850,000 barrels a day to the Gulf Coast.

Enbridge spokeswoman Lorraine Little said the company's upgrades aren't an attempt to avoid the scrutiny that fell upon Keystone XL; they're driven by surging oil demand in different parts of North America.

"The process is what it is," she said. "We have to abide by what's been laid out for us in order to complete a project. And so if it means going state by state and complying with their regulatory requirements, that's what we have to do."

Enbridge's recent spills raise questions about its safety record.

The company was recently fined \$3.7 million for a Marshall, Mich., spill that dumped 20,082 barrels of oil in the Kalamazoo River in 2010, the biggest penalty ever from the nation's pipeline authority, the U.S. Transportation Department's Pipeline and Hazardous Materials Safety Administration.

In July, an Enbridge pipeline in Wisconsin spewed 1,200 barrels of oil, and U.S. pipeline regulators reiterated "long-standing concerns" about the company's "pattern of failures."

According to company data collected by the Polaris Institute, a left-leaning Canadian think tank, Enbridge has leaked 161,475 barrels of oil in 804 spills from 1999 to 2010.

Enbridge said it has learned from the Marshall spill.

"We as a company have taken a look to see what we can do to prevent that from happening again," Little said. "I would say that's the No. 1 goal — to prevent another Marshall incident. We've undertaken a lot of initiatives since that incident occurred."

Dear MPUC: THIS STORY WILL APPEAR IN THE SPRING OR SUMMER ISSUE OF THE MINNESOTA DEER HUNTERS ASSOCIATION MAGAZINE.

Mark Herwig
1958 Florence St.
White Bear Lake, MN 55110
651.209.4951

Please change the route to existing pipeline routes north of me - along Hwy. 210 - or the

I own 44 acres of land on County Road 4 six miles west of Mahtowa. The pipeline is proposed to go through my land.

500
Line
Route
South
Thunder.

Who's Land?

The joys and trials of owning some deer land

Story and photos by Mark Herwig

Mark Herwig

Author's Note: *In part I, printed in the Spring Issue 2013, I described my dreams of owning land and my experience buying that land. Part II hits on the highs and lows of the reality of owning land – and what a year it has been.*

After the pure joy of buying 44 acres of aspen forest for deer and grouse hunting 12 miles south of Cloquet and becoming a landowner for the first time in October 2012, there came June 10, 2013. On that day, I received a call from both Enbridge oil pipeline company wanting to survey for an oil pipeline west-east through my land and from a neighboring landowner wanting an easement to put in a power line just inside my east property line. Is this really happening?

I've known enough landowners to know there would be challenges, but two big ones the same day not eight months after taking ownership! I told them both no, that I wanted some of my land left to do what I want to do with it, that is hunt, camp, hike, etc.

As I understand it, the pipeline easement would be 50 feet wide when done, but would denude another 75 feet during construction – this astride an existing 50-foot power line easement. I didn't mind the power line and clearing because I wanted a shooting lane and grassland/food plot habitat. The power line easement, 33 feet of which is already on my deed, was for another 17 feet. Boy, my little 44 acres was getting chopped up pretty quick.

Next time, if there is one, I'll check with the county to see what plans others may have for any land I might buy. If I'd known about the oil pipeline plans, I would not have purchased this land. Apparently, there are already several oil

pipelines carrying Canadian oil running just north of my land to the port in Duluth/Superior. The proposed Enbridge pipeline would carry North Dakota oil to the Port of Superior, Wisconsin.

To be honest, I may attempt to sell my land yet and buy somewhere else more peaceful...or buy a second parcel. Really, though, are there any quiet places left these days with all the much human population and development expansion? Like any relationship, there are good and bad times. The passage of time also deepens the ties that bind owner and land regardless of the ups and downs. And so it has been for me and my land since that disturbing day in June.

Moving ahead

In January 2013 I received funding from the Natural Resources Conservation Service (NRCS) in Duluth to do a conservation activity plan (CAP). One goal is to improve habitat for the golden winged warbler, which is in danger of being listed under the Endangered Species Act because it has experience one of the steepest declines of any North American songbird in the last 45 years. The plan calls for cutting 10.5 acres of aspen in four patches among the 22 acres of forest on my land. The remaining 22 acres are wetland and the power line clearing grassland.

On April 6, I attended my first MDHA banquet with the St. Croix Valley Chapter. I loved the noon-3pm format and even won a nice cooler, which I have since used. I had a lot of fun and the food was great. I had a nice chat with Dennis Quarberg, a MDHA vice president, and learned about the chapter's youth recruitment mission. It fired me up about owning some hunting land.

In May, I made two trips to Camp Moose Horn, as I call my land since it lies in the Moose Horn River watershed. I planted oaks, sugar maples, mulberry, dog woods, other fruiting shrubs and a few flowering crabs – all within 8-foot wire fencing. I can't wait to see the blossoms this spring. One morning, and later that evening, a pair of sandhills cranes trumpeted across my land from the south where they no doubt were nesting.

In July, a Sandstone contractor was finally able to get to work smoothing out my access road and start on two food plots on the power line clearing. A very wet spring delayed his work. The plots got done by early August and grew well enough. Trail cams showed a good number of deer, bucks, does and fawns using the plots. It was great fun checking the trail cam every time I went up.

On a sunny August 8, an NRCS official and forester with the American Bird Conservancy (ABC) came by to check my land out for implementing the CAP. The

two groups are working together with private landowners to improve habitat for the golden winged warbler. It's a lucky coincidence the warbler likes the same habitat deer, grouse, woodcock and bear like – the other species I want to nurture.

On our walk, we discovered a beaver had moved into a permanent wetland. Later it built a small lodge astride a dirt access road and started piling up a food cache before winter set in. He was already cutting the aspen the NRCS later marked for logging. Another forest manager. Welcome.

We walked on and bear scat, full of berries (the cut will provide even more habitat for berries), predator scat with snowshoe hare hair in it, red June berries, gray dog wood bearing fruit (grouse love it), curly everlasting (beautiful clusters of white flowers), spreading dog vein (looks like sumac) and balsam popular trees. Earlier, the dainty yellow blossoms of the blue-bead lilly were everywhere too.

As we walked back to my trailer, a doe fled a bedding area to the east. I leave this area undisturbed as a refuge to help keep deer on the property. I also had several doe/fawn pairs on my trail cam as well as two gobbler turkey one June day – I'll be hunting them this spring!

Come September, I started hunting grouse and woodcock, bagging woodcock every trip, but no grouse. I missed a few, but they are scarce as the birds are in the low part of their 10-year cycle. I saw wolf tracks on my land one day.

In October, I purchased a larger trailer for Camp Moose Horn, a 24-footer and a generator to run the power. That summer, a buddy and I trailered our scooters up and toured the area, finding several good public grouse areas. I also checked out the nearby Kettle Lake Wildlife Management Area and discovered it is full of wild rice. I've since made two flails using Camp Moose Horn aspen saplings. The flails are using to bend over and knock the rice grains into a canoe. I intend to gather some of the bounty this fall.

Sadly, I've also had to deal with the continuing oil pipeline issue. I donated funds to the Carlton County Land Stewards, which is fighting to relocate the pipeline north where a pipeline corridor already exists. The Stewards figure why ruin a whole new swath of land when a pipeline farm is already set up and operating so near. I have up Steward signs and wrote the Minnesota Public Utilities Commission, which will decide the pipeline issue. I've learned, however, that many locals favor the pipeline because it will bring additional taxes to all levels of local government. I understand that.

My new friends in Carlton County, and they include agency folks, old college friends in Duluth, neighbors and shop owners, have counseled me to stay put regardless the pipeline. They say it will open another shooting lane for me and provide more grassland for wildlife, that I'll get a payment for the easement and I've already made it a second home. We'll see. Pipelines leak and with one may come more.

In the meantime, I had a second season deer hunting. I had a shot at a buck, but passed because it wasn't a good shot. I've shot a lot of deer and feel no need to gut- or butt-shoot an animal. I had great fun talking to the neighbors last season, however, who scored six deer. One neighbor two properties west shot a doe, but couldn't find it until six hours later. When he did, wolves had helped themselves, leaving only hide and bones. I still don't mind sharing with the wolves, but I sure hope to get a nice deer up there someday. One logger counseled patience. He said spring 2013 was very hard on the fawn crop. Now, winter 2013-14 has turned out to be brutal. That's life in the northland.

In December, the NRCS/ABC team braved deep snows and cold temps to mark four cut areas with blue spray paint. The patch cutting provides more edge and age class timber that wildlife love. That month I also contracted with a Cloquet paper company and logger to cut the 10.5 acres next winter – or even this winter if the buyer needs the logs sooner. The NRCS help has been great. A 10.5-acre on cut is too small for most commercial loggers. Since I will likely get paid by the NRCS, I was able to entice a logger to do the cut by offering a discount on the stumpage (logging term for payment/cord). I have enjoyed working with the NRCS because they know a lot about forest ecology, management and how to get the job done for wildlife. I encourage others to work with them too. They are local and I liked the fact all three folks I've worked with are deer hunters! You bet, they are one of us.

I also enrolled in the state Sustainable Forestry Initiative, which pays a small amount/acre/year for landowner agreeing not to development his land for eight years. This is a good program that helps maintain wild lands for our wildlife, water and soil resources and hunting heritage at a time they are under increasing human attack from all directions.

True, I have contributed to habitat fragmentation, which is bad for some species, but I am greatly improving the habitat for wildlife and have committed to keep it that way for years to come.

For sure, owning this land has brought me more joy than distress. I'll continue to dream of "Mr. Big" coming out of the woods by my stand. In the meantime, I am finding other joys at Camp Moose Horn. I'm working on a piece of furniture that will include Adirondack-style split twigs cut from aspen saplings on my land. I look forward to seeing how Mr. Beaver progresses with his home. Maybe there's a Mrs. Beaver and beave-lets in the offing this spring! I've kept some pumpkin and squash seeds from last year's garden to plant this spring for a foodplot....for both me and the deer!

I'll do some birding again this spring. One day last spring I spotted a female golden winged warbler, a group of black and white warblers flitting about, chattering as they gobbled up insects on the aspen trunks and a striking yellow, white and black evening grosbeak. I look forward to turkey hunting, ricing and, of course, fall deer season. The land keeps on giving and those of us who take from it must give back. It's an unspoken contract carried on the wind that hunters, more than most, hear most clearly.

From: Tal and Rich [mailto:rhess48@arvig.net]
Sent: Monday, March 24, 2014 7:12 PM
To: Hartman, Larry (COMM)
Cc: jeff@mnlakesandrivers.org
Subject: Proposed Sandpiper Pipeline Routing

Mr. Hartman:

My name is Richard Hess and I am a resident of Minnesota. I am a retired Fisheries Biologist and I live in the Longville area of North Cass County. I relocated here from Illinois due to my love for the Northwoods and its many bodies of water that provide quality fishing and other water recreation opportunities. During my career I was involved in a number of environmental issues threatening water bodies in the United States which included industrial pollution and contamination from a variety of chemical compounds.

The proposed route of the Sandpiper Pipeline travels across much of North Central Minnesota's woodlands, and near and even beneath important bodies of water. The proposed route appears to traverse Cass County from about Backus through the southern portion of North Cass County before it exits Cass County near Land O' Lakes State Forest. These areas contain critical terrestrial and aquatic habitats that would not only be disrupted by the construction of the proposed pipeline, but are also threatened by future accidents resulting from pipeline spills. The resulting contamination would be hazardous to all living organisms, difficult and expensive to remediate, and could have long lasting detrimental effects on our natural resources.

While I understand the need for oil in our country and the need to increase capacity for transporting the oil coming from sources in North Dakota, I question why a new route is proposed between Clearbrook, MN

and Superior, WI. Enbridge already has constructed an existing mainline between these two locations. I do not know the dimensions of this right-of-way, but I ask why can't they construct this proposed pipeline within that existing right-of-way? I see no apparent reason why any new areas should be opened to this proposed pipeline, if it could follow the path of the existing mainline. Enough risks to our environment and natural resources already exist there, so we should avoid exploiting new areas to the disruption and potential contamination threat that this proposed route would present.

Thank you for your time, and I shall await your reply.

Respectfully,

Richard Hess
P.O. Box 270
Longville, MN 56655

83 Velina Dr.
Albany, NY 12203
March 21, 2014

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

Dear Larry Hartman:

I am writing to comment on the proposed Sandpiper pipeline across Minnesota. This proposal has been assigned docket numbers 13-473 and 13-474 by the Minnesota Public Utilities Commission.

While I am not a resident of Minnesota, I do spend some time in the summer at a lake in Crow Wing County. While the pipeline is a number of miles away from this lake, I am concerned about the effects on waters of a major spill from the proposed pipeline – especially after reading about the spill from an Enbridge pipeline along the Kalamazoo River. Although a spill of that magnitude might not occur, the importance of lakes to Minnesota should make one be very concerned about the possibility.

I have questions which may be applicable for comparing possible routes as well as for overall environmental reviews.

What are the potential impacts of a major oil spill into water on human activities (e.g. recreation such as fishing or swimming)? Could people be unable to use lakeside property they own? Could it cause problems for many people? How much drinking water could be threatened by a spill? How far away from the pipeline could there be a substantial impact? How long could such an impact last? Years? Decades? What are the sentimental impacts for people who have enjoyed a lake throughout their lifetimes if it is contaminated by an oil spill? How well does the route minimize the risk of contaminating lakes and rivers enjoyed by many?

There are questions about government preparation for a major spill into water. Would local first responders be equipped to deal with a major spill in their jurisdiction or in a stream flowing into their jurisdiction? Who pays for such equipment – especially in localities where the pipeline itself is not providing taxes but where a spill upstream may cause problems? Will the state have emergency equipment near the pipeline to deal with a spill? If the route of the new pipeline is not near an existing pipeline, how well have these factors been considered?

If there is a major spill impacting a lake, what will the impact be on wildlife such as loons or bald eagles (which I have seen in Crow Wing County)? Deaths of loons in an oil spill would be heart-breaking for those who enjoy loons and their calls. Deaths of bald eagles in an oil spill would be discouraging for those who have been encouraged by the recovery in numbers of bald eagles in recent decades. How well does the route minimize the risk of contaminating lakes which support such wildlife?

I thank you for your attention.

Sincerely yours,

Martin V. Hildebrand

Martin V. Hildebrand

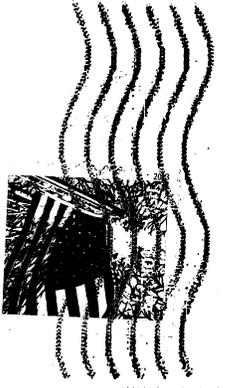
RECEIVED

MAR 27 2014

MAILROOM

Martin Hildebrand
83 Odessa Dr.
Albany, NY 12203

ALBANY NY 122
22 MAR 2014 PM 11



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

ES101601333



-----Original Message-----

From: Gary Hill [<mailto:hillx001@umn.edu>]

Sent: Thursday, April 03, 2014 8:00 AM

To: Hartman, Larry (COMM)

Subject: Sandpiper Pipeline Proposal Document #PPL-13-474

Dear Honorable Commissioners,

My name is Gary Hill and I am a homeowner living near the proposed Sandpiper southern route which I strongly oppose

In the matter of North Dakota Pipeline Company's (Enbridge Energy Partners) application for a certificate of need to place a pipeline in the Sandy Lake watershed north of McGregor, Minnesota, I strongly urge you to deny their request to place a pipeline in their "preferred route". The State of Minnesota is rapidly being covered with pipelines pumping crude oil from the the west and north through our state to Superior, Wisconsin and beyond. While it is being touted as the safest means of transporting oil to the refineries to meet a short term goal, in the long run, the oil spills that are sure to follow, will prove to be devastating to the state, the environment and its people.

What disturbs me deeply is that the citizens of the state of Minnesota deserve to have a long range policy in place to assess the need for pipelines and the effect they will have on the environment. Just because a pipeline company applies for a certificate of need, does not mean there is inherently a need for a pipeline. The Sandpiper Pipeline project proposed by North Dakota Pipeline Company (Enbridge) represents only a fraction of their proposed expansion throughout North America. For example, Enbridge is proposing to upgrade its Line 67 to carry additional tar sands crude oil from Canada to Superior Wisconsin and beyond. Enbridge recently wrote that it will cost 2.6 billion dollars to remove and replace the 46 year old line, which has been the source of many spills. This replacement will increase its capacity to nearly 800,000 barrels/day. The increase in oil transported by the new proposal would rival the volume proposed by the Keystone XL pipeline expansion. It doesn't seem logical or prudent to go forward with both proposals. The Sandpiper pipeline proposal is projected to cost about the same as the replacement of Line 67, or 2.6 billion dollars. From an economic and environmental standpoint it would make more sense to replace aging pipelines with new and larger pipelines in existing corridors, rather than build new ones which put at risk additional lands and waterways, given that the cost is the same. Since pipelines have a limited lifespan and spills happen more often than not in the older pipelines, I think it makes good sense to restrict the growth of pipelines being built in the state. In most cases, once approval of a right-of-way route is given, it opens the door for easy installation of multiple pipelines in the corridor without greater scrutiny. Unfortunately, pipelines have a history of spills that threaten human health and the environment. Enbridge Energy Partners alone has had over 800 pipeline oil spills from 1999-2010 which dumped more than 1,000,000 gallons of crude oil into the environment. In 2010 alone, Enbridge pipelines had 91 spills totaling 1,400,000 gallons into rivers, streams and the environment. In 2009 Enbridge paid a \$1,100,000 settlement for a lawsuit by the State of Wisconsin for 545 environmental violations in the state. In 2011 there were 2,000 claims against Enbridge for damages. The clean up of the Kalamazoo River spill is expected to cost more than \$1,000,000,000. These statistics alone should make one wary of issuing any permit which would allow Enbridge Energy Partners of Canada to build any pipelines anywhere near the state of Minnesota. They currently have over 44 projects proposed or underway to either build, maintain or replace failing pipelines. The problem is that they will always be guided by profit and take the path of least resistance, not the path that makes the most sense for the environment and safety of the people whose property is crossed by their pipelines. Therefore, they are seeking another route (Sandpiper "preferred" route) for additional pipelines to cross our county and state, which I strongly oppose.

In light of the fact that Enbridge Energy Partners is planning to replace one of several pipelines in their northern corridor because it is old and has continual maintenance needs, I suggest that the most logical thing to do is to require Enbridge to replace its old pipelines in existing corridors with new and larger pipelines that will not only be safer but also meet the increased demand. It is essential that they clean up their existing mess before embarking on a new southern Sandpiper route which will expose additional lands and waterways to the hazards of an oil spill. We the people of Minnesota deserve better than to be bullied by a company whose track record is so horrible.

The case could also be made that in the absence of a long range energy policy in the state, why are we paving the way for the continuing dependence on fossil fuels by allowing oil companies and pipeline companies who are in the business to make a profit and exploit a limited resource, determine our future? It is time to say no to this insane expansion of oil dependency and take a look at the whole picture. Do we really want to destroy our lands and waterways in the most beautiful part of our state for the sake of a few more years of oil? What is the urgency here? How many of these lines will still be in existence or need repair in 50 years? Why not have the courage to draw a

line in the sand now and say no? Rather than react, act to develop a long range plan that will meet the true needs of the people of Minnesota, rather than corporate greed.

Please say no to the southern "preferred route" of the Sandpiper Pipeline proposal.

Require Enbridge Partners to replace all aging and vulnerable pipelines in their existing corridors with new and larger pipelines to increase capacity, before allowing any new pipeline routes through the state.

Develop a long range plan to meet the needs of all parties involved, with preference given to the Treaty Rights of Native Americans and the rights of the people of the state of Minnesota.

Respectfully,

Gary Hill
50569 218th Place
McGregor, MN 55760

From: Janet Hill [mailto:janet.hill@rocketmail.com]
Sent: Wednesday, March 12, 2014 2:12 PM
To: Hartman, Larry (COMM)
Subject: Docket #13-474 Sandpiper: Alternative Routes and Segments

Dear Mr. Hartman,

I am writing to urge the MN PUC not to approve the permit for Enbridge to build the Sandpiper pipeline corridor on its proposed route. Enbridge should do whatever is required to expand their existing northern corridor, and not add yet another pipeline corridor to northern Minnesota. If they are limited to one corridor, they will be able to maintain their pipelines more easily at a lower cost, and the number of counties affected will be far fewer.

Proliferation of pipelines in northern Minnesota, with its unusually large number of lakes, will lead to environmental and economic disaster if an oil leak occurs, which is not a far-fetched scenario.

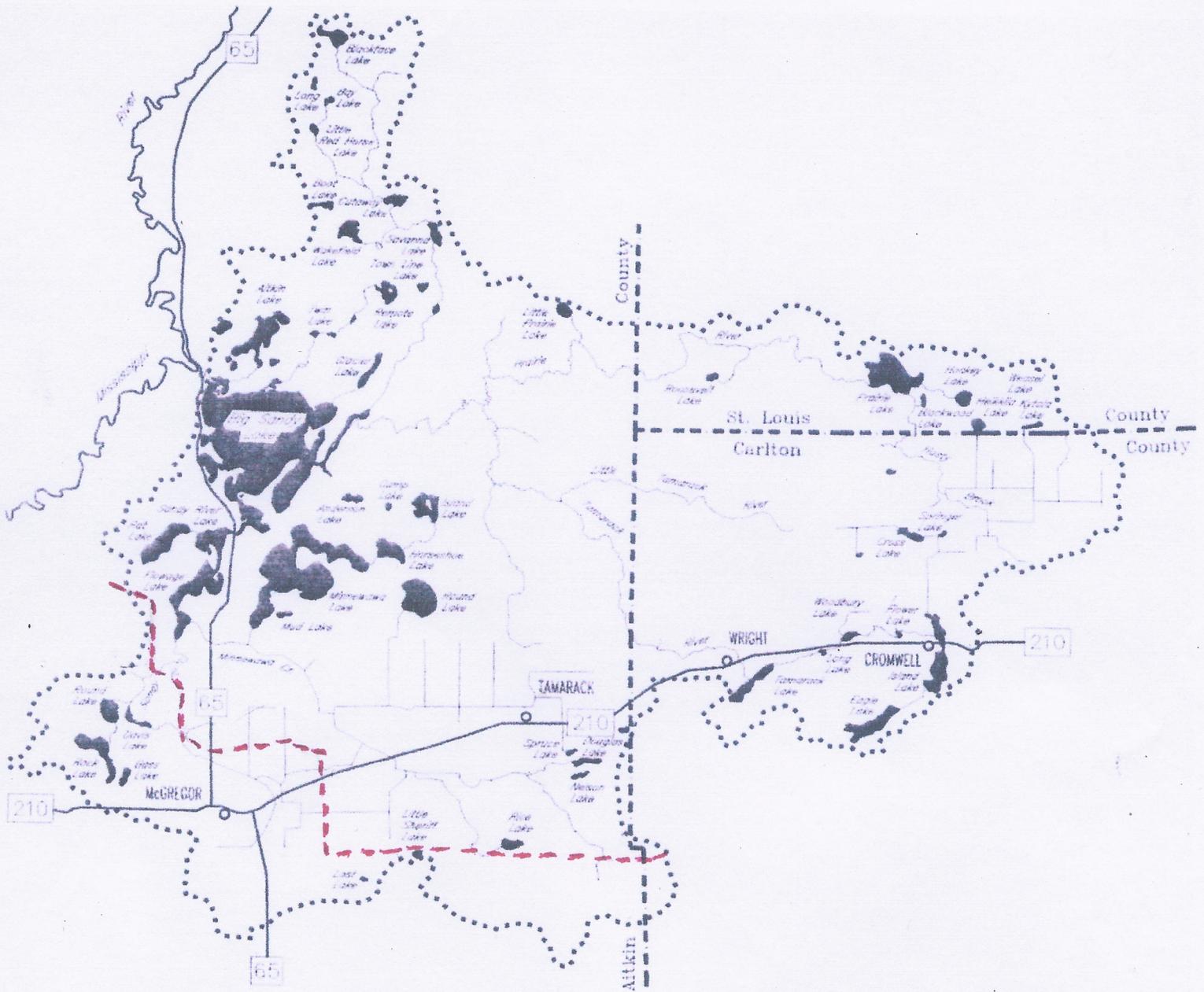
Politicians who claim that this will be good for the state due to tax revenues are ignoring the enormous cost of cleanup from oil spills, and the resulting decreased property values. As for jobs, an additional pipeline corridor will create few permanent jobs in Minnesota, certainly not enough to warrant such a threat to additional lakes and rivers.

The mission of the Minnesota Public Utilities Commission is “to create and maintain a regulatory environment that ensures safe, reliable and efficient utility services at fair and reasonable rates,” so you are, by your own definition, required decline the proposed Sandpiper corridor. Adding more pipeline corridors to our state is not safe or reliable, as evidenced by Enbridge’s history of pipeline spills. Adding another pipeline corridor may be efficient for Enbridge, but it is not efficient for the state of Minnesota, which is the entity you work for.

Please do the right thing for the current and future residents of Minnesota: reject the proposed Sandpiper corridor and require that Enbridge expand their existing corridor along the northern route.

Janet Hill

Map of the Big Sandy Area Lakes Watershed Management Project



PROPOSED SANDPIPER PIPELINE ROUTE -----

From: Janet Hill [mailto:janet.hill@rocketmail.com]
Sent: Tuesday, March 25, 2014 12:29 PM
To: Hartman, Larry (COMM)
Subject: Public comment, docket PPL-13-474 -- Sandpiper

I am writing to suggest an alternative route for the Sandpiper pipeline corridor: the existing northern route.

When Enbridge added the Alberta Clipper pipeline to their existing northern corridor in 2010, they must have known that they would soon need another pipeline to carry Bakken oil. They went ahead and filled up their pipeline corridor anyway, and now are telling us that it's full and they need another one. Despite Enbridge's assertions that they're being "driven by demand," the fact is that in their haste to deliver tar sands, they got themselves into trouble of their own making, and they now want the state of Minnesota to sacrifice even more of our land and lakes and rivers to them to bail them out so they can make all the profits possible from tar sands and Bakken oil. It's not a requirement that Enbridge profit from transporting both tar sands and Bakken oil. It's certainly not something that the state of Minnesota or even the U.S. needs to be concerned about, as there is, they tell us, a LOT of oil in North Dakota. It stands to reason that we don't need the additional Alberta tar sands if this is the case.

At the recent public meetings along the proposed Sandpiper corridor, Enbridge representatives offered nothing by way of compensation for our land and water. They sat at their table at the front of the room with their long-range plans and their lawyers, and repeated their talking points, even in the face of some excellent comments and questions. Minnesota residents who attended the meetings, by contrast, didn't have access to the same information Enbridge had, or lawyers working for us full-time to tell us what **our** rights are. What are Enbridge's long range plans? Do they plan at any point to address the reality of climate change? They know the answers to this; we don't. This is the kind of information we need to make an informed decision. We can't rush blindly into something with such profound implications to our state's future without knowing all the facts. Enbridge is asking us to.

One man who stood up to comment at the public meeting I attended earlier this month was a logger. He asked the Enbridge panel if Enbridge will provide mats to local businesses so that large vehicles like logging trucks can safely cross the pipeline out in the field. He said that providing his own bridges over the pipeline costs him as much as \$15,000 apiece. The Enbridge representatives told him no, he'll have to pay for those crossings himself. This is the spirit of cooperation Enbridge is offering the state of Minnesota.

The U.S. is addicted to oil, and I admit that I'm addicted to it just like every other American. But every scientific report that's come out in the past several months has pointed to dire consequences if we don't start to address climate change. We need to start swinging in the other direction at some point, individually and as a country. Denying Enbridge's request to add another oil pipeline corridor to beautiful northern Minnesota is as good a place to start as any. Many of us are willing to sacrifice for the future survival of the planet, and Enbridge and other oil companies should be willing to sacrifice as well, by starting to make their profits from renewables instead of expanding on the antique technology of oil. There is a lot of money to be made in renewables, for anyone currently profiting from oil. If there weren't, Enbridge wouldn't already be invested in wind power in Canada.

Please make Enbridge find a way to use their existing northern corridor, even if it means they must convert their Alberta Clipper tar sands pipeline to Bakken oil. Enbridge coolly asks Minnesota residents to adjust to decades of threats from oil spills -- and pay the price of actual oil spills -- but a better solution would be to expect Enbridge to adjust to life without profits from transporting tar sands. They can use the Alberta Clipper pipeline for Bakken oil, and put the money they save from building a new corridor into their wind power holdings in Canada. I don't think they'll suffer for long.

Sincerely,
Janet Hill
50569 218th Place
McGregor, MN 55760

-----Original Message-----

From: apache@web.lmic.state.mn.us [<mailto:apache@web.lmic.state.mn.us>]

Sent: Thursday, April 03, 2014 9:32 AM

To: Hartman, Larry (COMM)

Subject: Hill Thu Apr 3 09:31:52 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: Jenny Hill

County: Cass County

City: Pine River

Email: jenny.hill@gmail.com

Phone: 2185873489

Impact: I am a homeowner in the Pine River area. I think much more serious consideration needs to be given to the risk of water contamination caused by a pipeline leak which would impact not only public health but also wildlife and fundamental natural resources so important to our quality of life and tourism in our area.

Mitigation:

Submission date: Thu Apr 3 09:31:52 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

-----Original Message-----

From: Mark Hobson [<mailto:markhobson@mac.com>]

Sent: Wednesday, February 26, 2014 5:06 AM

To: Hartman, Larry (COMM)

Subject: Sandpiper

Although I do not oppose this pipeline, I would like to know why the new pipeline does not follow/parallel the route of the Existing Enbridge Mainline System. Wouldn't the existing route minimize exposure?

Also, I want to demand/ensure the newest, safest technologies are used in building and maintaining the pipeline.

Mark Hobson
23877 County 80
Nevis, Mn 56467

612-804-5627

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger
David C. Boyd
Nancy Lange
J. Dennis O'Brien
Betsy Wergin

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of the Application of North
Dakota Pipeline Company LLC for a
Pipeline Routing Permit for the
Sandpiper Pipeline Project in Minnesota

HONOR THE EARTH'S
MOTION FOR
ALTERNATIVE SANDPIPER
PIPELINE ROUTE 29-94

DOCKET NO. PL-6668/PPL-13-474

To: The above-named Commission

Recognizing the pipeline review process follows Minn. Stat. 216G and Minn. Rules 7852 and that pursuant to Minn. R. 7829.3200, the Commission is authorized to vary any of its rules upon making *certain* findings, *Honor the Earth* moves this Commission to accept the 29-94 Alternative Route for the Sandpiper pipeline application referenced above. *Honor the Earth* has also served and filed a Motion¹ to extend the present deadlines to in order to provide additional community public hearings and the extension of the current April 4 deadline for submission of alternative routes.

The purpose of pipeline routing criteria is to guide “the commission in determining the route of a pipeline in parts 7852.0800 to 7852.1900. The commission shall make a specific written finding with respect to each of the criteria. (Id. Subp 1) The Rules provide that when “determining the route of a proposed pipeline, the commission shall consider the characteristics, the potential impacts, and methods to minimize or

¹ See submission number 20144-97971 under this caption available via eDockets.

mitigate the potential impacts of all proposed routes so that it may select a route that minimizes human and environmental impact.” (Id. Subp 2).

Pursuant to Subp. 3. which provides a variety categories for which the commission shall consider the impact on the “pipeline route selection used in determining whether a proposed pipeline and associated facilities qualify for partial exemption and issuance of a pipeline routing permit ...” As such, *Honor the Earth* now provides a brief analysis of the criteria which “the commission shall consider the impact of the pipeline and associated facilities on the following” social, economic and environmental categories:

A. human settlement, existence and density of populated areas, existing and planned future land use, and management plans.

The proposed 29-94 Alternative Sandpiper pipeline route should qualify for an exemption for the pipeline routing permit because it is in the current corridor of the existing right-of-way of the (west side of Interstate 29 in North Dakota) Southside of I-94 through Minnesota to the Twin Cities. There will be encounters with human settlements at interchanges but not much different than what happens on the Clipper Corridor through other urban areas including Cass Lake, Deer River, Cohasset, Grand Rapids to Duluth & Superior. Aside from three or four larger metropolitan areas like Fargo and St. Cloud, those cities will be like Grand Forks with the pipeline to Duluth/Superior.

By using the Interstate right-of-way Corridor, many multiple uses and costs can be saved/shared as a symbiotic project in the existing or increased width of corridor, planned future uses like pipeline emergency response centers and management plans with regard to protecting the environment and accessibility of public safety equipment and personnel in the event of an oil spill or other related disasters.

The most recent expression of this Alternative Sandpiper route was in response to an article "Crude oil pipeline planned, would pass through three Game and Fish wildlife management areas" in the Arkansas Times posted by Cowper Chadbourn on 03/20/2014

I love technology and the lifestyle it provides me. I also love the outdoors. If a new pipeline is needed, I'd like to see it routed right down the middle of I-40, where the additional impact over what already exists will be minimal, thousands of people will know it is there and witness both the construction and the day to day operation, see things like if it is being maintained or not, and report any leaks within minutes. Current laws or regulations prevent that? Then change them! Oh, and just so one company is not profiting via the dollars it saves by using public property, be sure to charge them a little something that is still a bargain for them but generates revenue to maintain I-40 or some other infrastructure that serves us all.²

B. the natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational land.

Alternative Route 29–94 is being proposed to avoid and prevent unnecessary risks and harms of the natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands as described in the purpose of Minnesota’s Environmental Policy

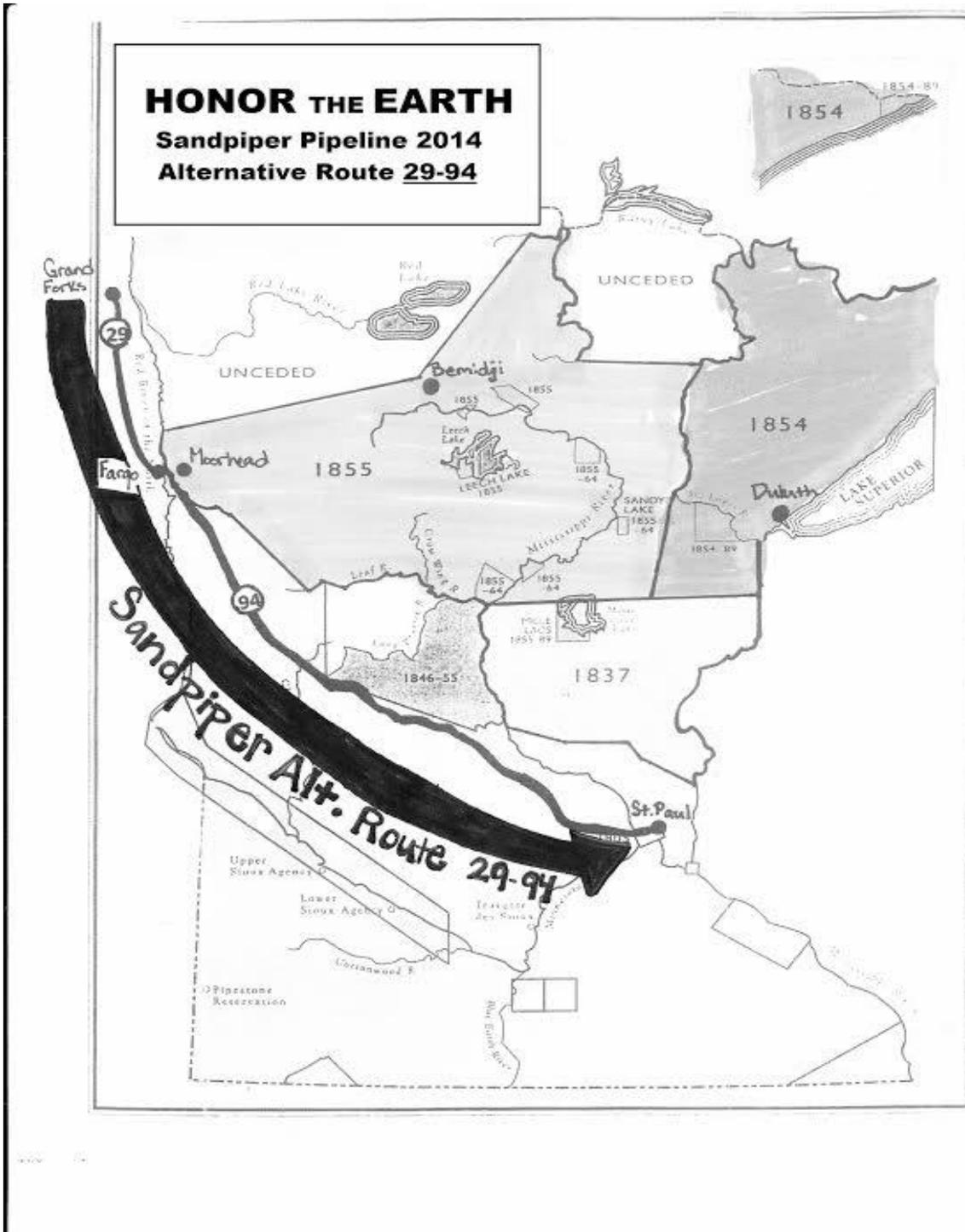
(a) to declare a state policy that will encourage productive and enjoyable harmony between human beings and their environment; (b) to promote efforts that will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of human beings; and (c) to enrich the understanding of the ecological systems and natural resources important to the state and to the nation.

Minn. Stat. 116D.01 PURPOSE.

C. lands of historical, archaeological, and cultural significance.

As noted above, lands of historical, archaeological and cultural significance to the Minnesota Chippewa, as well as all of the other humans who have come to live in northern Minnesota will be spared additional future risks to one of the greatest sources of freshwater for Minnesota and the United States. This Alternative Sandpiper route would be consistent with respect of Chippewa Treaty rights to preserve their present ecosystem, for future ecosystems. See Alternate Sandpiper Route Illustration map in relation to the various ceded and unceded territories at the time Minnesota statehood in 1858.

² "Crude oil pipeline planned, would pass through three Game and Fish wildlife management areas"
<http://www.arktimes.com/arkansas/crude-oil-pipeline-planned-would-pass-through-three-game-and-fish-wildlife-management-areas/Content?oid=3247516>



As shown above, I-29 and I-94 Alternative Sandpiper Route mostly skirts the western and southern Chippewa ceded territories in Minnesota and keeps potential oil spills away from 1) the Red River to Hudson Bay, 2) the Mississippi River to the Gulf of Mexico and 3) the St Louis River and other tributaries to Lake Superior to the Atlantic Ocean. This is HUGE safety.

D. economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations.

The economies within the 29-94 corridor are the same ones that are already tolerating the air pollution, light pollution, noise pollution, water pollution from oil related products and emissions.

By comparison the economies of the presently proposed Sandpiper route include tourism, recreation, agriculture, forestry and clean water for the hunting, fishing and gathering for the Chippewa and everyone else up north, and the drinking water of everybody downstream.

E. pipeline cost and accessibility.

Pipeline cost and accessibility should be improved due to much greater accessibility in the existing corridor of an interstate or widened strip-taking adjacent to the length of the interstate would provide better cost-benefit ratio for maintenance and Public Safety in the event of an oil spill or routine pipeline maintenance. Response time for oil spill discovery, mitigation and clean-up will be improved and more easily accomplished.

F. use of existing rights-of-way and right-of-way sharing or paralleling.

Use of existing right-of-way and right-of-way sharing/paralleling will be a cost savings to everyone who has already paid, as citizens for that right-of-way and the risk of future oil spills will be where the greatest amount of users and beneficiaries of the oil can also be the vigilant watch dogs in the event of a leak. Certain cities along the corridor will become the focus for pipeline safety resources and pipeline maintenance.

G. natural resources and features.

Impact to the natural resources of the corridor will be minimal, aside from a potential taking of additional strips adjacent to the south side of I 94. The Minnesota Department of Transportation has done all the environmental impact analysis on the environment risks. MnDOT also conducts monitoring of the environment with its water quality unit and air quality unit as well as environmental remediation.

H. the extent to which human or environmental effects are subject to mitigation by regulatory control and by application of the permit conditions contained in part

7852.3400 for pipeline right-of-way preparation, construction, cleanup, and restoration practices.

By using the I-94 corridor the extent to which human or environmental effects need mitigation is greatly reduced because prior permit conditions have been met for other types of road right-of-way preparation, construction cleanup and restoration practices. This corridor can become a model for co-location, public safety and logical mitigation with regard to the *preferred Sandpiper route*.

I. cumulative potential effect of related or anticipated future pipeline construction.

The PUC should take this opportunity to consider the cumulative potential effect of related or anticipated future pipeline construction and start to avoid any aquifers and swamps and wetlands north of I-94. To provide for more future pipeline construction, sufficient right-of-way should be accessed and acquired by applicant as part of this application alternative route.

J. relevant policies, rules, and regulations of the state and federal agencies and local government land use laws including ordinances adopted under Minnesota Statutes, section 299J.05, relating to the location, design, construction, or operation of the proposed pipeline and associated facilities.

The relevant policies, rules, and regulations of the state and federal agencies with regard to land-use laws are important for location, design, construction and operation should be able to accommodate this alternative route especially for long-term protection of the health, safety and welfare of the all the public and the environment.

As such, by having emergency equipment located along the interstate communities of greater size, or minimum distance communities they most benefit from any perceived reduction in the cost of gas and oil, and they will also have the increased safety protections of fire departments and emergency responders and other public safety personnel.

On the flipside of the coin, *everything else is at risk* in rural, dispersed areas where few services and emergency equipment exist for many miles in the most pristine, freshwater resource of the North American continent.

Interstate corridors presently accommodate various utilities and pipelines and would not face significant environmental, economic, or social impacts beyond that already present

for the adjacent populations and which have been thoroughly studied and reviewed. MnDOT has many maps, construction plans, aerial photography, known grades, routes and elevations with known soil types of the earth, water, wetlands and other environmental areas of concern. Nothing new needs to be created, the state already possesses all the information.

WHEREFORE, based on the prior filings, yesterday's Motion to Extend deadlines along with attachments and letters to the Governor and Commerce Commissioner, and in recognition of the *known* extreme, inevitable, irreparable harms the current Sandpiper Route proposed by Applicant Enbridge will cause, Petitioner *Honor the Earth* prays this Commission will accept and approve this Alternate Sandpiper Route 29-94 as a more logical way to avoid all the *known* ecosystem we all need to survive and properly place the potential risks, where the greatest benefits and public safety protections are most likely to have faster response times and damage control equipment and personnel.

Respectfully submitted April 4, 2014.

/s/ Frank Bibeau
Frank Bibeau
51124 County Road 118
Deer River, Minnesota 56636
Cellular 218-760-1258
E-mail frankbibeau@gmail.com

Peter Erlinder
International Humanitarian Law Institute
325 Cedar Street, Suite 308
St. Paul, MN 55101
Cellular 651-271-4616
Email proferlinder@gmail.com

ATTORNEYS FOR *HONOR THE EARTH*

Rice, Robin (PUC)

From: Elizabeth Horst <locktob@charter.net>
Sent: Thursday, February 20, 2014 4:33 PM
To: staff, cao (PUC)
Subject: Sandpiper Pipeline

Re:Enbridge Pipeline Route
Docket Numbers 13-474

Honorable Commissioners:

I am opposed to Enbridge Pipelines (N. Dakota Pipeline Co.) LLC's proposed Southern route for the Sandpiper Pipeline. We have land on an environmental lake close Park Rapids in Hubbard County. It is a shame to even consider a pipeline through this gorges lake and river area of Minnesota.

Everyday we hear about spills that are affecting our environment, why would we consider such a route for a pipeline? I understand Enbridge has had many spills. I feel our water may turn out to be a more valuable asset than our oil. Can't this pipeline go along existing utility lines?

Please consider alternative routes.

Elizabeth Horst
1305 Northway Circle
St.Cloud, MN 56303

From: Peter Hovde [mailto:hovde@cord.edu]
Sent: Friday, April 04, 2014 3:49 PM
To: Hartman, Larry (COMM)
Subject: Comment on Docket Number PL-6668/ PPL-13-474

Comment on Docket Number PPL-13-474

North Dakota Pipeline Company, LLC- Routing Permit for the Sandpiper Pipeline.

We would like to compliment the PUC on its Geronimo Energy Aurora project decision. It is refreshing to see a regulatory agency which has not been captured by the very corporate entities and their short term interests the agency is supposed to regulate.

We reacted in disbelief to the news that a pipeline was being proposed that would run just east of Itasca State Park and right through the heart to the lake district. We set to work researching the matter. It is one of those issues where concerns only get worse, the more you look into it. We would encourage the Public Utilities Commission to reject the proposed Sandpiper route in favor of the northern more direct route, or rejecting the pipeline proposal altogether, in favor of encouraging more projects like the Xcel-Geronimo Energy Aurora project.

We would like to offer a number of comments on the proposed Sandpiper pipeline.

Frost Heave. Frost heave of buried pipelines is of particular concern in areas with seasonably cold temperatures, such as Minnesota. An article in the *Canadian Geotechnical Journal* examines exactly those risks. Just a sampling of problems: Upheaval buckling is a well-known phenomenon in buried pipelines: it can lead to large upward movements of a segment of the pipeline. As the pipeline arches upward, the top wall of the pipeline radically thins, making fracture much more likely.

Stresses in the pipe due to frost heave occur because of the differences in the amount and rate of frost heave. When the pipeline passes from sandy ground (which shows little frost heave) to silty ground (which commonly shows significant heave) and freezing occurs, the pipe will be lifted in the silty segment and restrained by the sand. The points of transition from one type of soil to another are of particular concern. Freely available ground water is also highly conducive to frost heave. When the water seasonably melts, the pipeline often does not go back to its original state, but keeps the bend, which will likely increase even further in subsequent years.

The photos taken by the Ojibwe people riding the route of existing pipelines show pipelines emerging out of the ground, likely from such frost heaving.

With the high variability of soil types and water content in the glacial moraine—over which almost the entire length of the north-south portion of the pipeline is planned—a disturbingly large number of opportunities for frost heavy and upheaval buckling, and disturbingly large consequences for the area should the line rupture.

Source: Andrew C. Palmer and Peter J. Williams (2003) "Frost heave and pipeline upheaval buckling." *Canadian Geotechnical Journal*. 40: 10-33-1038.

Oil Spill and Clean Up Record. The Enbridge representatives at the various meetings and hearings made solemn promises that any future oil spills would be promptly and thoroughly cleaned up.

Clean Up Feasibility. Very much of the Sandpiper proposed route is through forested areas. When oil spills in a forested area, the oil follows the roots down into the earth, it then having an easier time getting into the groundwater. That oil around the roots affects

"...the root systems and indirectly affecting plant respiration and nutrient uptake. Also, without complete remediation of contaminated soil in a vegetation zone, long-term effects on vegetation could be expected." (From Draft Supplemental Environmental Impact Statement Keystone XL Project, page 38.)

Even with the best of intentions, equipment and unlimited funding, it is hard to take Enbridge's promises seriously. To clean up a spill in such an area would require destroying the forest in order to save it.

Risk to Groundwater. We understand that Enbridge would be responsible for cleaning up a spill which threatened the water supply of communities such as Park Rapids. The PUC representative at a Park Rapids hearing confirmed what we had found in our research: that Enbridge would not be responsible for cleaning up the wells of individual cabin and rural home owners with their private wells. As usual, the little people wind up holding the bag. The impact of a large spill on owners' dreams and the tourism industry in the area would be massive indeed.

Enbridge's Spill and Clean Up Record. Enbridge's cleanup of its record-setting oil spill in the Kalamazoo River is anything but confidence building. The July 2010 spill still has not been cleaned up, and Enbridge is resisting EPA's order to complete the dredging. (Enbridge Resisting Final Clean-Up of Its Michigan Oil Spill. Lisa Song, *InsideClimate News*, Jan 28, 2013.) Enbridge's record of detecting leaks and their responses to them belies their public assurances. Some items:

ITEM: [The EPA's website](#) says more than 1.1 million gallons of oil have already been recovered during the ongoing cleanup. Enbridge officially estimated the spill at 843,444 gallons. (More oil removed already than Enbridge acknowledges spilled....)

ITEM: A ruptured pipeline near Michigan's Kalamazoo River leaked oil for more than 17 hours, even as 16 high-priority alarms sounded in the operator's control room in Canada. Control room workers restarted the pipeline twice during that period—and were preparing for a third restart—when they learned from an outside party about the massive spill in 2010.

ITEM: NTSB investigators cited factors that they said worsened the spill and increased the amount of oil that leaked into the river. Mistakes in the company's Alberta-based control room allowed the leak to go undetected for over 17 hours as oil continued to flow through the line. And once it was detected, the company's initial response was ineffective due to a lack of equipment and trained personnel.

ITEM: From the Executive Summary of the accident investigation report of the National Transportation Safety Board (NTSB)

On Sunday, July 25, 2010, at 5:58 p.m., eastern daylight time, a segment of a 30-inch-diameter pipeline (Line 6B), owned and operated by Enbridge Incorporated (Enbridge) ruptured in a wetland in Marshall, Michigan. The rupture occurred during the last stages of a planned shutdown and was not discovered or addressed for over 17 hours. During the time lapse, Enbridge twice pumped additional oil (81 percent of the total release) into Line 6B during two startups; the total release was estimated to be 843,444 gallons of crude oil. The oil saturated the surrounding wetlands and flowed into the Talmadge Creek and the Kalamazoo River. Local residents self-evacuated from their houses, and the environment was negatively affected. Cleanup efforts continue as of the adoption date of this report, with continuing costs exceeding \$767 million. About 320 people reported symptoms consistent with crude oil exposure. No fatalities were reported.

Safety issues identified during this accident investigation include the following:

- The inadequacy of Enbridge's integrity management program to accurately assess and remediate crack defects.
- The failure of Enbridge's control center staff to recognize abnormal conditions related to ruptures.
- The inadequacy of Enbridge's facility response plan to ensure adequate training of the first responders and sufficient emergency response resources allocated to respond to a worst-case release.
- Inadequate regulatory requirements and oversight of crack defects in pipelines.
- Inadequate regulatory requirements for facility response plans under 49 CFR 194.115, which do not mandate the amount of resources or recovery capacity required for a worst-case discharge.

(From NTSB's report "Enbridge Incorporated Hazardous Liquid Pipeline Rupture and Release.") http://www.nts.gov/news/events/2012/marshall_mi/index.html

Threat to Unusually Sensitive Areas. The Federal Pipeline and Hazardous Materials Safety Administration (PHMSA) and its Office of Pipeline Safety (OPS) is responsible for identifying Unusually Sensitive Areas (USAs), "areas that are unusually sensitive to environmental damage in the event of a hazardous liquid pipeline release." If a pipeline threatens a USA, a risk assessment must be made.

"The risk assessments will include consultations, when necessary, with Federal and state agencies responsible for protecting threatened and endangered species, depleted marine mammals, or *critical drinking water resources*." (Emphasis mine)

As noted above, since the area along the proposed Sandpiper route is studded with private drinking water wells for cabins and resorts, it is reasonable that USAs might exist along the route.

Citing security concerns, PHMSA limits the accessibility of drinking water USAs to pipeline operators only, and not to the general public, although USA final reports are available to state and local government agencies. To make reasoned judgements about the proposal without public access to these data is simple impossible. We assume that PUC will have access to these PHMSA data and will use it in their decision making.

<http://www.phmsa.dot.gov/pipeline/ini.a.ves/usa>

UNUSUALLY SENSITIVE AREA DATA

http://www.npms.phmsa.dot.gov/data/data_usa.htm

PROCEDURES FOR REQUESTING USA DATA

http://www.npms.phmsa.dot.gov/data/USA_data/USA_Ops_SH.htm

Minnesota's Natural Treasures. What we find most upsetting of all about the Sandpiper proposed route is the close proximity to two of the most pristine and precious places south of the BWCA, Itasca State Park and the Mississippi Headwaters, and to put those places at risk of major and permanent damage.

It appears that the pipeline route may lie just outside the watershed of Lake Itasca. But, given the jumbled soils of this entire area--the terminal moraine of the last glacier--predicting where oil pollution would **not** wind up in the groundwater is a fool's errand. And the borders of the ecosystem that supports the lake, the park, and the headwaters are much beyond those more limited areas.

It is our understanding that the proposed route would violate Minnesota statutes protecting the Mississippi Headwaters. These alone would seem to obviate the proposed route.

“The joint powers board of Clearwater, Beltrami, Cass, Hubbard, Itasca, Aitkin, Crow Wing and Morrison Counties, the MHB (Mississippi Headwaters Board) is mandated by Minnesota Statutes 103F.361-377 to enhance and protect the natural, cultural, historic, scientific and recreational values of the headwaters region.”

www.mississippiheadwaters.org/Overview.asp

For all these reasons and more, we hope PUC's decision will reject Enbridge's routing permit for its proposed Sandpiper route from the multiple risks the pipeline would impose, risks to the future of Minnesota's natural icons and the cultural *and economic* treasure of Minnesota's lake district.

Thank you,

Peter and Charlene Hovde

Long Lost Lake, Clearwater County

From: Arthur Howe [mailto:arthurkatyhowe@comcast.net]
Sent: Sunday, March 30, 2014 8:40 PM
To: Hartman, Larry (COMM)
Subject: Docket 13-474 Question

Arthur T Howe
13988 Chippewa Loop
Park Rapids MN 56470

March 30 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 (PUC) Docket Number: PL6668/PPL-13-474

Dear Mr. Hartman,

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

Sincerely,

Arthur Howe

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

From: Larry Howell [mailto:lhowell2@gmail.com]
Sent: Thursday, April 03, 2014 5:27 PM
To: Hartman, Larry (COMM)
Subject: Enbridge Sandpiper Pipeline

Enbridge is proposing to deviate from its originally established right of way which was from Clearbrook to Bemidji to Grand Rapids to Superior. Instead it is proposing a "preferred route" running south from Clearbrook to south of Park Rapids, then east to McGregor and Superior. The Straight River and numerous trout streams will be crossed.

As an avid and passionate trout fisherman, I urge all constituents to closely scrutinize the pipeline route and to ensure the greatest possible protections for trout streams and their aquifers.

Thank you.

Larry Howell

-----Original Message-----

From: apache@web.lmic.state.mn.us [<mailto:apache@web.lmic.state.mn.us>]

Sent: Tuesday, March 04, 2014 7:05 AM

To: Hartman, Larry (COMM)

Subject: Hurd-Lof Tue Mar 4 07:04:35 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: Lu Ann Hurd-

Lof County: Hubbard

County City: Akeley

Email: luann47@gmail.com

Phone: 218-652-4081

Impact: Please add my name to the list of those requesting an extension in the public hearing date in Park Rapids for the Sandpiper pipeline project. I don't have a number but know that many of our seasonal residents won't return until mid-April. I understand this could impact the proposed project start date, but it also could make the public hearing process more meaningful and less likely to be criticized in the future.

Mitigation:

Submission date: Tue Mar 4 07:04:35 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