



Public Comment Sheet

North Dakota Pipeline Company LLC Sandpiper Pipeline Project

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

PLEASE PRINT CLEARLY

Name: Steve Raatikka

Representing: SMW #10

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St. Cloud, MN 56303

Tel: 320-259-6006

COMMENTS

I support the pipeline.

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 «««

To: Minnesota Public Utilities Commission

121 7th Place East Suite 350

St Paul, MN 55101-2147

Subject: Public Comment on Docket #'s 13-473 and 13-474

RECEIVED
FEB 24 2014
MINNESOTA PUBLIC
UTILITIES COMMISSION

The Lower Crow Wing Lakes Association respectfully requests the Public Utilities Commission to reject the Southern route proposed by Enbridge for its Sandpiper pipeline project. The Association represents the people who live or own property on or near 1st Crow Wing Lake, 2nd Crow Wing Lake, 3rd Crow Wing Lake, and 4th Crow Wing Lakes in Hubbard County. The proposed Southern route of the Sandpiper pipeline would come within a mile of the lakes we represent.

The Association recognizes that the United States is currently dependent on a reliable source of petroleum products. However, if an additional pipeline is necessary, it should be built on a route that minimizes the risk of environmental catastrophe inherent in an oil pipeline project.

The Association strenuously objects to Enbridge's choice of the Southern route for that pipeline when other, less environmentally risky routes are available. Enbridge's "preferred" Southern route would result in hundreds of miles of new oil pipeline being built through and across a combination of irreplaceable lakes, rivers, and environmentally sensitive land in Minnesota. An alternative Northern route is available to Enbridge which would follow existing Enbridge rights-of-way and would avoid subjecting additional Minnesota lands and waters to the very real risks associated with a new oil pipeline.

We believe the permitting of a lengthy new oil pipeline in Minnesota when there is a less risky alternative available, would be a mistake. Further, allowing such a new pipeline to be built and run by a company with Enbridge's track record would be inviting future environmental and health disasters. Enbridge's dismal record of oil spills over the past decade has been documented in other Public Comments and there is no need to repeat that record here, but we point out that there is absolutely no reason to believe that their record in the future will be any different.

The Lower Crow Wing Lakes Association urges the Public Utilities Commission the Public Utilities Commission to reject this unnecessarily risky proposal, and require Enbridge to choose the Northern pipeline route.

Sincerely,



Douglas J. Ralston

Board Member, Lower Crow Wing Lakes Association

2/19/14

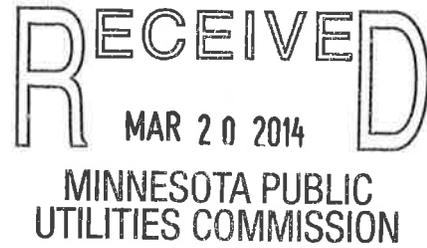
13-474

To: Minnesota Public Utilities Commission

121 7th Place East Suite 350

St Paul, MN 55101-2147

Subject: Public Comment on Docket # 13-474



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Sincerely,

A handwritten signature in black ink, appearing to read "D. Ralston", followed by the date "3/16/14" written in the same ink.

Douglas J. Ralston

Board Member, Lower Crow Wing Lakes Association

March 3, 2014

Kathy and Doug Rasch

43003 191st Ave

Clearbrook, MN 56634

TO:

Larry Hartman, Environmental Review Manager

Energy environmental Review and Analysis

Minnesota Department of Commerce

85 7th Place East, Suite 500

St Paul, MN 55101

To:

Minnesota Public Utilities Commission

RE: Enbridge Pipeline Route, Docket Number PL-6668/PPL-13-474

Dear Members of the Minnesota Public Utility Commission and Minnesota Department of Commerce,

Hello, we are landowners in Clearwater County along the southern route NDCCP(Enbridge) is proposing for their new Sandpiper pipeline. We want to encourage you, the PUC, to evaluate the huge environmental and human impacts of the proposed southern route and consider an alternative route or system to transport the Bakken oil. You know we already have a Minnesota Pipeline Company easement running north to south across our 80 acres. The easement was expanded in 2007. North of our property that expansion cleared all the woodland up to the edge of a good sized wetland. The combined open area now exposed allows west and northwest wind to blow through our farmyard. The NDCCP proposal would again increase that open area, cause more drifting, increase our heating bills, make our road more difficult and all in all diminish the livability of our farmyard. This point is a small consideration we know but one side effect among many that many rural Minnesotans would have to endure if this pipeline route permit is given. Adding another pipeline with an entirely separate company right next to the Minnesota Pipeline Company line will also seriously limit landowner's ability to negotiate least impact routes in the future because only one side of each easement could be expanded.

Our objections to the south route are many. To simplify them we will use the Wetland Conservation Act (WCA) as a model to illustrate our concerns. Minnesota WCA Rule 8420, Chapter 354 was approved by the MN State legislature in 1991 to regulate construction and other activities to protect the environmental value of wetlands in Minnesota. This is generally considered to be for public benefit. WCA is intended to prevent negative environmental impact, specifically to wetlands, namely “No Net Loss” of wetlands and “avoid direct or indirect impacts from activities that destroy or diminish the quantity, quality, and biological diversity of wetlands”. The basic WCA principle is called sequencing. It involves three basic simple steps; avoid, minimize, mitigate, which must be addressed in that order without skipping one step to get to the next. For private landowners it is implemented rather strictly, with little flexibility for construction activities impacting greater than 2,000 – 10,000 sq ft of wetland, depending on specific location and wetland type. NDCP(Enbridge) is a private for-profit company. Shouldn't they be held to the same standards as private citizens?

Back to the three simple steps, the first one being avoidance. Following the shorter Enbridge northern route identified on the attached map and avoiding the southern route will avoid impacts to nearly 700 acres, simply through 48 less miles of pipeline easement. This in itself is a huge reduction in impact. In addition, as the table 2.3.3-1 on page 2-12 of the Sandpiper MN EIR illustrates, the Northern route also crosses less greenfield areas, fewer NWI wetlands (a key factor in the WCA rules), less highly erodible soils, many less acres of prime agricultural land and fewer perennial waterbodies to bore under, all adding up to a marked reduction in environmental impacts by avoiding the southern route. It also means less infrastructure to maintain safely, less miles of pipes to leak and pollute our surface waters, ground water, and soils. While the southern route does apparently cross less State and National forest land, this seems a negligible consideration without any evidence presented of Native Plant Community Inventories, Ecological Assessments or other similar assessments completed to evaluate the quality of the public vs private forest land that would be crossed.

Another option in avoidance is trains. The infrastructure is already in place. Railroad tracks can haul much more than just oil and their safety record (barrel of oil spilled per volume shipped) is better. It is hard to get US data comparing the safety records, but we have Canadian data from Transport Canada that states the rate of spills by rail is .255 spills per cubic meter; by pipeline the rate is .352 spills per cubic meter. A significant difference if that oil is spilled into Minnesota lakes and streams, farmland, forests, and the Upper Mississippi Watershed. This safety record will only improve with Burlington Northern Santa Fe's (BNSF) recent announcement of the purchase of 5,000 new “Next Generation” tanker rail cars, built with safety designs which exceed even recent new safety design standards from 2011, and collaborative efforts between Railroad Companies and NDOT to adopt much stricter safety rules.

In the revised Route Permit Application, section 2.2.3 beginning on page 2-5 discussing the rail option, NDPC states that 2052 rail cars are needed to ship the oil as a pipeline alternative. BNSF's addition of 5,000 new cars will certainly meet that requirement. As for rails consumption of fossil fuels, and its subsequent impact to air quality, no clear comparison of energy used is presented which accounts for Enbridge's daily use, such as the daily airplane patrol of pipeline routes or the fleet of vehicles routinely used in pipeline maintenance. As for disrupted service, pipelines are routinely shut down for “pigging” the lines, checking for weak spots, digging up lines for repair and inspection. Considering Enbridge's spill record of over 800 spills in the last decade, it appears they should spend even more energy and time doing this.

The second step in sequencing is minimizing impact. Under the WCA model this can require private citizens, for public benefit, to modify their planned construction projects to minimize the environmental impacts. Modifications considered to achieve minimizing impacts include taking a shorter route, reducing the footprint of the project, or in some cases, even relocating. In the case of the Sandpiper project, the shorter route is the Northern route. We have already discussed numerous environmental benefits of the northern route. By NDPC's own admission their greatest obstacle with the northern route is tribal land. If NDPC's negotiations with the tribes were as fair as those with the counties, i.e. tax revenues from pipeline, the northern route is still viable. The Minnesota PUC, Department of Commerce or other State agency could help mediate these negotiations?

Environmental impacts could be further minimized by reducing the permanent easement and the temporary work space, which is anything but temporary. In our experience with Minnesota Pipeline Company's last expansion through our property in 2007, they were able to narrow their temporary workspace from 65ft to 45 ft throughout our property. They successfully completed the project within the reduced work space. NDPC wants 70 ft of temporary work space. Why would they need more than the 45 ft Minnesota Pipeline Company needed to complete their line? When Minnesota Pipeline Company expanded adjacent to the easement they already had, they asked for 25 ft additional permanent easement, as they could obviously utilize some of their current easement as work area. NDPC should be able to do the same by following their existing northern easement route. This reduction in easement and work area along the entire pipeline would further minimize environmental impact.

In summary, the greatest avoidance of environmental impact would be to utilize existing railroad infrastructure and not build the pipeline. Recognizing that this is a Routing Permit Application, the best route alternative to reduce environmental impact to prime farmland, greenfield areas, NWI wetlands and permanent water bodies is for NDPC to follow their current easements on the Northern Route.

Of course we understand that WCA does not apply to "public" utilities within the same parameters as it does to private landowners. But it is a model for responsible resource protection. The point is NDPC (Enbridge) shouldn't, as a private company, fall under the umbrage of public utility exception. If we truly want to protect water, wetland, soil, and forest beyond rhetoric, the pipeline, wherever it is built should be built with the greatest effort to protect the environment for all of us. It seems time that government entities like the MN PUC and the Department of Commerce stop being biased and truly help ensure these projects are built with the greatest care. Within that consideration the northern route would be the better choice and we should all work together to make it possible.

Thank you for your time and patience. We would appreciate some feedback from the PUC and Department of Commerce on the concerns and route alternative presented here.

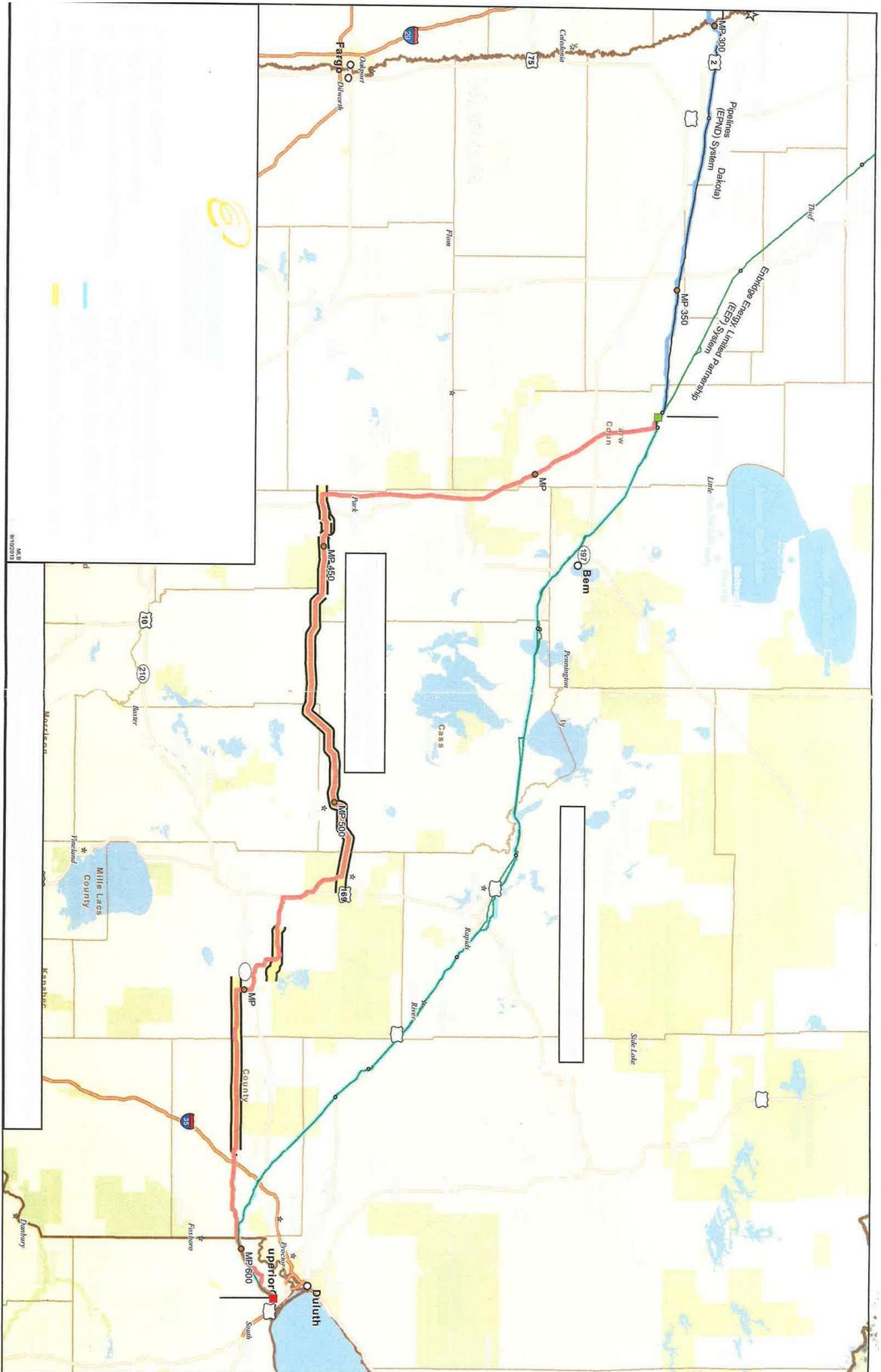
Sincerely,

Doug and Kathy Rasch

43003 191st ave.

Clearbrook, MN 56634

horsehillgdn@gvtel.com



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

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

Sent: Tuesday, April 01, 2014 9:32 PM

To: Hartman, Larry (COMM)

Subject: Rayman Tue Apr 1 21:31:46 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: Janet Rayman

County: Cass County

City: Outing

Email: j_rayman@msn.com

Phone: 612-270-3176

Impact: Please consider the position paper - Sandpiper Pipeline Project (PUC) Docket Number: PL 6668/PPL-13-474. The general consensus in our area is one of disbelief that placing this pipeline is even being considered through the area. It seems like a no brainer that an alternative route away from our waterways or adding another pipeline to the existing route along hwy #2 makes total sense. We have so many regulations imposed on us a lakeshore property owners by the state of MN (DNR) that it doesn't make sense that big companies don't have to play by the same rules. Mitigation: Refer to Sandpiper Pipeline Project (PUC) Docket Number: PL 6668/PPL-13-474. Please consider using the existing pipeline route or go up and around as proposed.

Submission date: Tue Apr 1 21:31:46 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: apache@web.lmic.state.mn.us [<mailto:apache@web.lmic.state.mn.us>]

Sent: Tuesday, April 01, 2014 9:58 PM

To: Hartman, Larry (COMM)

Subject: rayman Tue Apr 1 21:57:58 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: scott rayman

County: Hennepin County

City: plymouth

Email: scott_rayman@irco.com

Phone: 612-363-3723

Impact: I am concerned that the chances of a leak are higher than have been advertised and there is a better route for the pipeline.

Mitigation: I don't understand why existing route with pipeline along hwy 2 couldn't be used. Why increase the footprint to a larger area where there are many water ways and property owners. Submission date: Tue Apr 1 21:57:58 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