MINNESOTA DEPARTMENT OF COMMERCE

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May 12, 2015

Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: Comments and Recommendations of Department of Commerce
Energy Environmental Review and Analysis Staff
Docket No. PL-9/PPL-15-137

Dear Mr. Wolf,

Attached are comments and recommendations of Department of Commerce, Energy Environmental Review and Analysis (EERA) staff in the following matter:

> In the Matter of the Application of Enbridge Pipeline, Limited Partnership, for a Pipeline Routing Permit for the Line 3 Replacement Project in Minnesota from the North Dakota Border to the Wisconsin Border

The application was filed on April 24, 2015, by:

Christina K. Brusven Fredrickson and Byron P.A. 200 South Sixth Street Suite 4000 Minneapolis, MN 55402 cbrusven@fredlaw.com	Arshia Javaherian Senior Legal Council 26 E Superior Street Duluth, Minnesota 55802 Arshia.javaherian@enbridge.com

EERA staff recommends acceptance of the application as complete. Staff is available to answer any questions the Commission may have.

Sincerely,

/s/ Jamie MacAlister
EERA Staff

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MINNESOTA DEPARTMENT OF COMMERCE

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS AND RECOMMENDATIONS OF THE MINNESOTA DEPARTMENT OF COMMERCE ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS

DOCKET NO. PL-9/PPL-15-137

Date…….. May 12, 2015
EERA Staff: Jamie MacAlister .....(651) 539-1775

In the Matter of the Application of Enbridge Pipeline, Limited Partnership, for a Pipeline Routing Permit for the Line 3 Replacement Project in Minnesota from the North Dakota Border to the Wisconsin Border

Issues Addressed: These comments and recommendations address the completeness of the Line 3 Replacement Project pipeline route permit application per Minnesota Rules 7852.2100 to 7852.3100.

Documents Attached:
(1) Map of the Proposed Project

Additional documents and information can be found on http://mn.gov/commerce/energyfacilities/Docket.html?Id=34079 or on eDockets https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showeDocketsSearch&showEdocket=true&userType=public by typing the year (15) and the number (137)

This document can be made available in alternative formats; i.e. large print or audio tape by calling (651) 539-1530.

Introduction and Background

On April 24, 2015, Enbridge Energy, Limited Partnership filed a route permit application to replace the Line 3 crude oil pipeline under the full permitting process (Minnesota Rules 7852.0800). Currently, Line 3 consists of 282 miles of 34-inch pipeline. Enbridge Energy proposes to replace the existing pipeline with 337 miles of new 36-inch diameter pipeline. The proposed project will address integrity and maintenance concerns along the line and restore capacity to meet shipper needs and regional needs.

The project is located in Kittson, Marshall, Pennington, Red Lake, Polk, Clearwater, Hubbard, Wadena, Cass, Crow Wing, Aitkin and Carlton counties.

Project Description and Purpose

Line 3 was originally constructed as a series of loops beginning in 1962 and placed into service in 1968.[1] The integrity management plan for Line 3 has seen an increasing number of integrity digs and repairs in recent years. Starting in 2008, Enbridge voluntarily reduced the pressure and capacity of Line 3 to 390 thousand barrels per day (bpd).

As proposed, the Line 3 Replacement Project will replace 282 miles of 34-inch pipeline with 337 miles of new 36-inch diameter pipeline and restore the line to its historical operating capacity of 760,000 bpd from its current capacity of 390,000 bpd. Associated facilities for the project include upgrading four existing pump stations and adding an additional four pump stations at new locations. The project will also include 27 safety valves. The replacement pipeline will follow the existing Enbridge mainline corridor west of Clearbrook, Minnesota, in Kittson, Marshall, Pennington, Red Lake, Polk, and Clearwater counties to the terminal in Clearbrook. East of Clearbrook, the pipeline will follow approximately 75 percent of existing utility corridors in Hubbard, Wadena, Cass, Crow Wing, Aitkin, and Carlton counties. If a route permit is issued for the preferred route of the Sandpiper Pipeline, Line 3 will be adjacent to Sandpiper east of Clearbrook to the Minnesota/Wisconsin border, with the percent of corridor sharing increasing to almost 98 percent.[2]

Although Line 3 anticipates co-locating with Sandpiper east of Clearbrook, the preferred route for Line 3 replacement is not dependent on the construction of Sandpiper. The development, and ultimate selection, of the preferred route for Line 3 is detailed in Chapter 6 of the application.[3] The applicant provides construction impact calculations for the preferred route of Line 3 with and without the construction of Sandpiper east of Clearbrook.

Once Line 3 Replacement construction is complete and in service, existing Line 3 will be permanently deactivated and remain in place.

Regulatory Process and Procedures

In Minnesota, petroleum pipelines meeting specific size (nominal diameter of six inches or more) and pressure requirements (more than 275 pounds per square inch), require a pipeline routing permit issued by the Minnesota Public Utilities Commission (Commission) per Minnesota Statute 216G.02 Subd. 1. The Line 3 replacement project will have a pipe diameter of 36-inches and an operating pressure of 1,440 pounds per square inch gauge (psig) and therefore requires a route permit from the Commission.

The proposed Line 3 will also require a Certificate of Need (CN) from the Commission, per Minnesota Statute 216B.2421. Enbridge Energy, Limited Partnership filed a CN application to the Commission on April 24, 2015.[4]

Route Permit Application and Acceptance

[1] See Chapter 2 of the Line 3 Replacement Route Permit Application to the Minnesota Public Utilities Commission.
[2] See Chapter 6 of the Line 3 Replacement Route Permit Application to the Minnesota Public Utilities Commission.
[3] *Ibid*.
[4] Application for a Certificate of Need (CN-14-916)

Enbridge Energy is seeking review under the full pipeline route selection procedures. The requirements of this process are detailed in Minnesota Rules 7852.0800 to 7852.2000. Under the full permitting process the applicant must identify its preferred route for the proposed pipeline and associated facilities. All other route alternatives considered by the applicant must be identified.

Route permit applications must provide specific information about the proposed project, including, but not limited to, applicant information, route description, proposed pipeline and associated facilities, and potential environmental impacts and mitigation measures (Minn. Rules 7852.2100 through 7852.3100).

Minnesota Statute 216G.02 Subd. 3(b)(1) requires that "a person proposing construction of a pipeline submit to the commission one preferred route for the pipeline and evidence of consideration of alternatives." These requirements must be addressed in the application as per Minn. Rules 7852.2200 and 7852.3100, respectively.

The Commission may accept an application as complete, reject an application and require additional information to be submitted, or accept an application as complete upon filing of supplemental information (Minn. Rule 7852.2000 Subp. 4).

The Commission has nine months to reach a final decision on the route permit application from the date the application is determined to be complete. The Commission may extend this limit for just cause or upon agreement of the applicant (Minn. Stat. 216G.02 Subd. 3 (b) (5); Minn. Rules 7852.0800). After acceptance of an application, the applicant shall provide any additional relevant information the Commission considers necessary to process the application.

Environmental Review

Applications for pipeline route permits are subject to environmental review under Minn. Rule Chapter 7852. The Environmental Quality Board (EQB) approved of the pipeline routing rules in 1989 as an alternative form of environmental review pursuant to the requirements of Minnesota Rules 4410.3600 Subp. 1., items A. through H.

Consequently, pipelines subject to the routing rules are not reviewed through environmental assessment worksheets (EAWs) or environmental impact statements (EISs), but receive equivalent review under the routing and permitting process established by the pipeline routing rules.

The review processes established for pipelines in Chapter 7852 include an Environmental Assessment Supplement as part of the pipeline routing permit application, a scoping process and environmental analysis to fulfill the intent and requirements of the Minnesota Environmental Policy Act and Minnesota Rules parts 4410.0200 to 4410.6500.

The environmental analysis, the comparative environmental analysis (CEA), evaluates all of the alternative routes authorized by the Commission for consideration at public hearing. This analysis also evaluates other issues identified at the public information meetings and in written comments received prior to the close of the deadline for providing comments or additional route

or route segment proposals (the scoping process). The CEA may be prepared by staff or by the applicant and reviewed by staff.

The environmental review process begins when the Commission determines that a route permit application is complete (Minnesota Rule 7850.2000 Subp. 4). Application acceptance allows initiation of the public participation and environmental review processes.

Public Information Meetings and Route Proposal Acceptance
After acceptance of an application for pipeline route selection, at least one public information/scoping meeting must be held in each county crossed by the applicant's preferred pipeline route to explain the route designation process, to respond to questions raised by the public, and to solicit comments on route and route segment proposals and other issues that should be examined in greater detail in the comparative environmental analysis that will be prepared and made available prior to the start of the public hearings (Minn. Rule 7852.1300).

Commission review of the route permit application under the pipeline route selection process allows other routes and route segments to be proposed for approval by the Commission to be considered at the public hearing. Minnesota Rule 7852.1400 provides that no route shall be considered at the public hearing unless accepted by the Commission before notice of the hearing.

Route or route segment proposals must be made on an appropriate map or aerial photo, contain the data and analysis required in parts 7852.2600, subpart 3, and in 7852.2700 (unless the information is substantially the same as provided by the applicant) and be presented to the Commission within 70 days of application acceptance.

If a route or route segment proposal is submitted to the Commission, the Commission has 10 days to determine if the proposal contains the necessary information. If it does, the proposal may be forwarded to the Commission for a determination of acceptance at the hearing. If the Commission determines that the proposal does not contain the necessary information, the Commission shall inform the proposer in writing of what additional information is required. The proposer must submit the additional information within 10 days to the Commission. The Commission shall determine within five working days whether the amended proposal contains the required information. If the Commission determines that the proposal does not contain the required information, the route proposer may appeal to the Commission at its next regular meeting for consideration of acceptance. If the proposal contains the required information, the Commission must consider acceptance of the route proposal for public hearing.

In previous pipeline route permit proceedings under the full process, the Commission authorized DOC EERA staff to receive and evaluate all route or route segment proposals submitted for consideration. EERA then presented all proposals to the Commission for a final determination on whether they should be accepted for consideration at the public hearing. This practice does not affect the Commission's authority to approve or disapprove of consideration of any route proposal. All compliant proposals are forwarded to the Commission for consideration.

This rule also requires a second round of public information meetings be held prior to the contested case hearing that will be held in each county through which a route is proposed to explain the route designation process, present major issues, and respond to questions raised by

the public. In the MinnCan and Alberta Clipper pipeline proceedings, the second public information meeting was held immediately prior the start of the contested case hearing.

Public Advisor
Upon acceptance of an application for a route permit, the Commission must designate a person to act as the public advisor on the project (Minn. Rule 7852.1200). The public advisor is available to answer questions for the public about the permitting process. In this role, the public advisor may not act as an advocate on behalf of any person.

Citizen Advisory Committee
The Commission may establish citizen advisory committees to evaluated route considered for designation (Minn. Rule 7852.1100). A citizen advisory committee must include at least one representative from the applicable Regional Development Commission, county, municipalities and one town board member along the preferred route.

Public Hearing
Under the full pipeline route selection procedures, the Line 3 Replacement Project pipeline route permit must be referred to the Office of Administrative Hearings for a contested case hearing pursuant to Minn. Rules Chapter 1405. Applications for pipeline route permits will require public hearings to be held after completion of the CEA. The hearings will be conducted in areas along the proposed route and in accordance with the hearing procedure prescribed in Chapter 1405 and be conducted by an administrative Law Judge from the Office of Administrative Hearings, as per Minn. Rule 7852.1700.

EERA Staff Analysis and Comments

Application Completeness
EERA staff participated in pre-filing meetings with Enbridge as well as provided extensive comments on its draft application. Subsequently, EERA staff has conducted a completeness review of the Line 3 Replacement Project application filed with the Commission on April 24, 2015, relative to the application content requirements specified in Minn. Rule 7852.2100 through 7852.3100. Enbridge has included a Completeness Checklist with the Table of Contents, itemizing the required information and where the information can be found within the document.

EERA staff considers its comments on the draft application to have been addressed and that the application meets the content requirements of Minn. Rule 7852.2100 through 7852.3100 and therefore is substantially complete.

Of note is the format change of the application. EERA worked closely with the applicant prior to filing the application to identify format and structural changes to the application, as well as to the map book and other appendices. These changes are intended to allow for improved access of project information and make the application more consistent with other energy facility applications submitted to the Commission. Specifically, the Environmental Information Report (EIR), which is typically submitted as a separate component to the application, is incorporated in the application as Chapter 7: Environmental Impacts of the Preferred Route. This seemingly minor format change provides greater ease of information access as well as context for reviewing impacts.

Another important change made to the application is the treatment of the shared route with Sandpiper. In earlier versions of the application, impacts in shared rights-of-way were not distinguished between projects. The current application now accounts for impacts for both Sandpiper Pipeline and Line 3 where the right-of way is shared.

7852.2100 General Information

The applicant has provided and satisfied this requirement. The project description is provided in Section 4 of the application and provides information on the existing and proposed associated facilities (pump stations), as well as information on the pipeline specifications. Section 2 of the application provides the history of Line 3 and provides the context for the pipeline replacement needed in Minnesota. Section 2 of the application also provides the background on Enbridge's Integrity Management Plan for Line, which is critical for understanding why Line 3 should be replaced rather than replacing sections of pipe.

7852. 2200 Proposed Pipeline and Associated Facilities

The applicant has provided and satisfied this requirement. This information is addressed in Section 4 of the Application. Plot plans for associated facilities are provided in Appendix C. Material data safety sheets have been provided in Appendix F. The material safety sheets provided are specific to Enbridge's Superior Region Response Zone.

7852. 2300 Land Requirements

The applicant has provided and satisfied this requirement. Land requirements are discussed in Section 4.6 of the application and Appendix G (Typical Right-of Way Configuration Drawings). EERA staff recommended and Enbridge has supplied information on the land requirements for Line 3 with and without the construction of the proposed Sandpiper Pipeline. The land requirements also describe the amount of land that will be permanently converted versus temporary land disturbances associated with construction.

7852.2400 Project Expansion

The applicant has provided this information and satisfied this requirement. Section 4.9 of the application provides this information. While the applicant has no plans for expansion, any capacity expansion would require a new Presidential Permit.[5]

7852.2500 Right-of-Way Preparation

The applicant has provided this information and satisfied this requirement. Section 5 of the application and Appendix G provide information on right-of-way preparation and construction. EERA worked closely with the applicant to bring more of this information into the application in addition to the information provided in the appendix so that it would be clear to readers what is generally involved in preparing the right-of-way and what the general construction sequence entails.

[5] See Section 1.4 of the Line 3 Replacement Route Permit Application to the Minnesota Public Utilities Commission

7852.2600 Preferred Route Location; Environment Description

The applicant has provided this information and satisfied this requirement. The visual and cartographic representation of the proposed project is crucial for readers to be able to visualize and locate the project in relation to specific features. EERA staff worked extensively with the applicant to develop maps for the Line 3's preferred route. Appendix B provides maps for the project. Maps are presented as a "set" that includes the route overlain on an aerial photograph and the route over a United States Geological Survey topographic map. To be useful, maps need to be at a scale that is appropriate to show features in relation to the project. The applicants addressed EERA's map comments on scale that will be useful for considering alternate routes and route segments, as well as the features adjacent to and near the preferred route.

7852.2700 Environmental Impact of Preferred Route

The applicant has provided this information and satisfied this requirement. Section 7 of the application describes the environmental impact of the applicant's preferred route. EERA staff provided numerous comments on this section and the applicant has largely addressed staff comments. Specifically, EERA requested the applicant provide impacts of the preferred route with and without the construction of the proposed Sandpiper Pipeline from Clearbrook east to the Wisconsin border. In assessing impacts with and without Sandpiper, particularly for right-of-way comparisons, the information provides a good snapshot of what the impacts look like under both scenarios. Again, bringing this information into the body of the application provides a document that is easier to navigate and that provides a more complete picture of the proposed project.

7852.2800 Right-of-Way Protection and Restoration Measures

The applicant has provided this information and satisfied this requirement. Sections 5 and 7 of the route application address these requirements with additional information provided in Appendix E (Environmental Protection Plan) and Appendix H (Agricultural Protection Plan). While some of this information may seem overly general, any specific mitigation measures necessary for protection and restoration of the right-of-way would be addressed in the route permit.

7852.2900 Operation and Maintenance

The applicant has provided this information and satisfied this requirement. Section 5.3 and Appendix D (Pipeline Safety Report) address this requirement. The applicant references the Pipeline and Hazardous Materials Safety Administration's (PHMSA) rules (49 CFR Part 195), which regulate transportation of hazardous liquids by pipeline. Minn. Rules require an applicant to provide a "general description of the anticipated operation and maintenance practices." Not only has the applicant met the requirement applicants have also provided a Safety Report, which provides more detail than the rule requires.

7852.3000 List of Government Agencies and Permits

The applicant has provided this information and satisfied this requirement. Section 7.18 of the application provides a list of permits needed from government agencies or authorities.

7852.3100 Evidence of Consideration of Alternative Routes

The applicant has provided this information and satisfied this requirement. Section 6 of the route application addresses the route selection process the applicant's used to determine the preferred route. EERA provided numerous comments to the applicants on this section and the applicant has largely addressed staff's comments. Enbridge based the route selection process on three geographic requirements: (1) the project must cross into Minnesota in Kittson County, (2) the project must interconnect with other Enbridge and third-party pipelines at and make deliveries to Clearbrook, and (3) the project must exit Minnesota in Carlton County and connect to the Superior Terminal. Other criteria were also used to determine the preferred route and other routes considered, including but not limited to geographic constraints, engineering constraints/requirements, and opportunities to avoid sensitive resources. Of importance is why the applicant is not considering Line 3 replacement in the existing Enbridge Mainline Corridor east of Clearbrook. The applicant presents various factors, including but not limited to construction safety, inadequate corridor width to accommodate a new Line 3, and human and environmental impacts that it believed precluded that option from being a viable alternative. The applicant has demonstrated that a thoughtful consideration of route alternatives has been completed.

Citizen Advisory Committees

EERA staff has evaluated the merits of establishing Citizen Advisory Committee(s) for the Line 3 Replacement Project.

Department of Commerce EERA staff considered four project characteristics: size (length), complexity, known or anticipated controversy, and sensitive features.

Project Size: Line 3 is approximately 337 miles in length, comprised of 36-inch pipe from the North Dakota to the terminal in Superior. The preferred route parallels Enbridge's existing mainline corridor from the North Dakota/Minnesota border to Clearbrook. East of Clearbrook to the Wisconsin border, it is anticipated that Line 3 will be co-located with the preferred route of the proposed Sandpiper Pipeline. In total, approximately 5,098 acres will be affected by construction. While right-of-way restoration activities will be undertaken for mitigation purposes, the short-term and some long-term impacts may be significant.

Project Complexity: The project is relatively complicated as it involves the construction of a 36-inch pipeline from the North Dakota border to the Wisconsin border across a large geographical area and traverses 12 counties, and a range of northern Minnesota landscape features that vary from almost exclusively agricultural land on the west, to forest, lakes, wetlands, bogs, lands with mineral deposits and specialty farms to the east. The preferred route also passes through a number of different governmental entities that have different interests and concerns, related to both landscape features crossed or impacted, and

jurisdiction. From Clearbrook to the Wisconsin border, many of the lands crossed are managed by the Minnesota Department of Natural Resources.

Known or Anticipated Controversy: At this time staff is aware of several issues associated with the project. Many of the issues and concerns for the preferred route for the Sandpiper Pipeline also apply to Line 3 given the proposed co-location of the two pipelines east of Clearbrook. The applicants have used the information from Sandpiper to avoid and minimize impacts along the preferred route. Issues include, but are not limited to Tribal rights, potential impacts to the Mississippi River Headwaters area, and pipeline safety concerns.

Sensitive Resources: A number of sensitive natural resource features are crossed (streams, rivers, wetlands, forested areas, specialty farms, lands with mineral leases, etc.) and may be affected by the project. These resources include but are not limited to the Headwaters of the Mississippi River, wild rice lakes, public recreation lands, and mineral resources. In some instances these features may be avoided; however, where avoidance is not possible, mitigation requirements will be necessary. The preferred route west and north of Clearbrook is primarily agricultural and crosses relatively fewer sensitive resources compared to the area east and south of Clearbrook. East of Clearbrook, the preferred route crosses or is near the Mississippi Headwaters, numerous wild rice lakes, and public lands. Aitkin and Carlton counties have mineral resources that may be impacted by the preferred route, public lands, and wild rice lakes.

Based on the criteria above, the project's length, complexities, controversies, and sensitive resources, Line 3 does warrant a citizen advisory committee or additional public outreach to assist the public and local units of governments on the permitting process and how to effectively engage in the process. As discussed above, the citizen advisory committee requires participation of a cross-section of local and regional governmental entities. EERA staff believes that two citizen advisory committees across the eastern portion of the preferred route would allow local representatives to offer their insight on local concerns and potential alternatives.

While the pipeline permitting process provides numerous opportunities for the public and state and local governmental units to identify issues and route alternatives to be addressed in the CEA, targeted, focused outreach could also be an effective means of further engaging the public and local units of government.

In addition to a Citizen Advisory Committee (s), EERA staff suggests two other options for further outreach and stakeholder involvement:

1. Provide extended outreach in the affected counties through the Regional Development Commissions or directly to the counties at scheduled county board meetings.
2. Develop focus groups of interested citizens and local units of government and provide outreach through the focus groups.

As mentioned previously, the issues east of Clearbrook where Line 3 and Sandpiper would be co-located, are well developed in the route docket for Sandpiper (13-474). EERA staff anticipates the route alternatives and route segment alternatives developed during the public

meetings for the Sandpiper project would likely apply to Line 3, in addition others that may arise during the public meeting process.

Enhanced and targeted outreach for the project would focus on the affected areas east of Clearbrook. West of Clearbrook, Line 3 follows and the existing mainline corridor where there are fewer sensitive resources.

Tribal engagement will also be a focus of EERA's outreach efforts on Line 3. While the project does not cross tribal land per se, tribal interests in the area is understandably high, from hunting and gathering rights, to concerns of the impact of the pipeline to those rights. EERA anticipates reaching out to the Indian Affairs Council and individual tribes. Meetings will be held in convenient locations for tribal members to attend.

Request for Variance

DOC EERA staff is requesting the Commission for a variance of the provisions of Minn. R. 7852.1400 Subparts 3 and 4 (route proposals) that establish a time limit of 70 days for route proposals to be submitted to the Commission. The 70 day schedule is insufficient to accommodate the necessary procedural steps, given the large project area and the number of public meetings that will be held, as well as providing adequate time for those attending toward the end of the meeting schedule to submit comments and for evaluation of proposed routes and preparation of a summary for the Commission. Therefore, a variance is requested from the requirements of 7852.1400 Subparts 3 and 4 to insure that all persons have adequate time to submit a route or route segment alternative to the Commission for consideration at the public hearings.

The Commission rules at part 7829.3200 allow the Commission to grant a variance to its rules when it determines that the following requirements are met:

A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;

B. granting the variance would not adversely affect the public interest; and

C. granting the variance would not conflict with standards imposed by law.

DOC EERA staff believes that the variance requests does not conflict with conditions A-C above and warrants consideration. Granting a time extension to propose additional route or route segments furthers the public interest and does not impose a hardship on the applicant.
DOC EERA staff does not believe any Commission conditions need to be imposed as a result of granting the variance.

Project Budget

Minnesota Rules 7852.4000 require an application fee to cover actual costs necessarily and reasonably incurred in processing an application for a pipeline routing permit, permit compliance activities, administrative overhead and legal expenses.

EERA has taken staff time, travel, hearing costs, and administrative law and attorney general fees into consideration in developing a budget. EERA is requesting Commission approval of a budget of up to $700,000, which may change during the course of administrative review. This figure does not include any costs associated with the certificate of need docket.

The rules require that Commission budget be reviewed with the applicant, which has been done, and be approved by the Commission. EERA staff believes that the proposed budget will cover all actual costs associated with Commission review of this project. The applicant will be provided with an accounting of all expenditures and may present objections to the Commission. Any unspent funds collected will be returned to the applicant.

Commerce EERA Recommendations

Commerce EERA staff recommends that the Commission accept the route permit application for the Line 3 Replacement Project as substantially complete, with the provision that Enbridge Energy, Limited Partnership provide the Commission and EERA staff with information as necessary to fulfill the requirements to complete the permitting process.

Additionally, EERA staff recommends that the Commission:

- Approve the variance request to the 70 day time limit in Minn. R. 7852.1400
- Approve the EERA proposed project budget of up to $700,000
- Determine that an advisory task force or other outreach effort is warranted at this time; and
- Authorize the DOC EERA staff to implement the requirements of the review process in Minnesota Rules 7852.1300 [Public Information Meetings], 7852.1400 [Route Proposal Acceptance] and 7852.1500 [Alternative Route Analysis].

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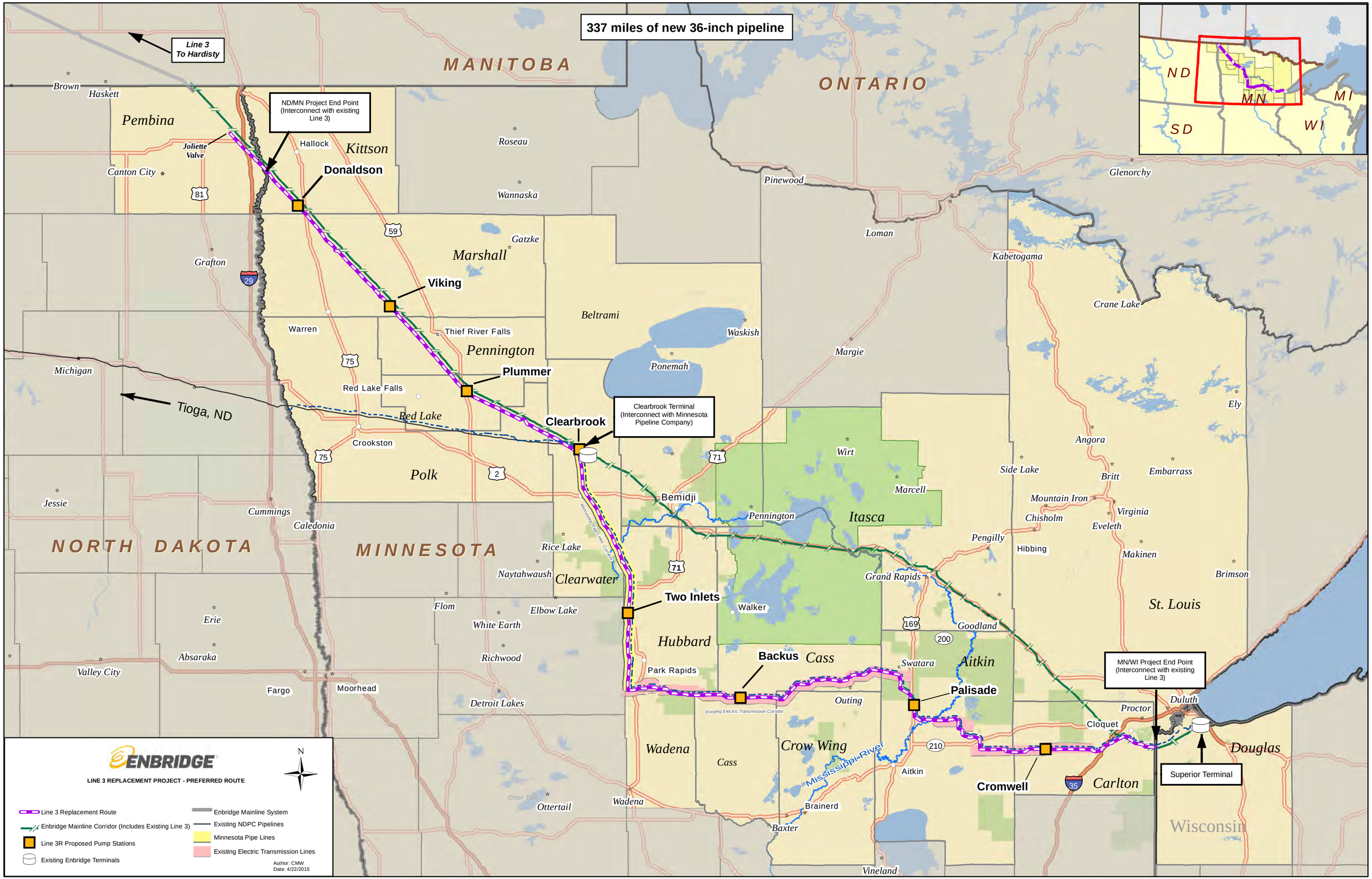
In addition DOC EERA staff will work with Commission staff to implement the requirements of Minnesota Rule 7852.0900 [Application Acceptance Notice] and 7852.1600 [Published Notice of Routes Accepted].


337 miles of new 36-inch pipeline
Line 3
To Hardisty
MANITOBA
ONTARIO
ND
SD
MN
WI
MI
Brown
Haskett
Pembina
Joliette Valve
Canton City
ND/MN Project End Point
(Interconnect with existing Line 3)
Hallock
Kittson
Donaldson
Roseau
Wannaska
Pinewood
Glenorchy
Loman
Kabetogama
Gatzke
Marshall
Grafton
Viking
Crane Lake
Beltrami
Warren
Thief River Falls
Waskish
Pennington
Margie
Ponemah
Michigan
Plummer
Red Lake Falls
Tioga, ND
Red Lake
Clearbrook
Clearbrook Terminal
(Interconnect with Minnesota Pipeline Company)
Ely
Crookston
Wirt
Angora
Polk
Side Lake
Britt
Embarrass
Jessie
Bemidji
Marcell
Mountain Iron
Cummings
Pennington
Itasca
Chisholm
Virginia
Caledonia
Eveleth
Pengilly
NORTH DAKOTA
MINNESOTA
Rice Lake
Hibbing
Makinen
Naytahwaush
Clearwater
Grand Rapids
Brimson
Two Inlets
Walker
St. Louis
Flom
Elbow Lake
Erie
White Earth
Goodland
Hubbard
Absaraka
Richwood
Backus
Cass
Swatara
Aitkin
Valley City
Park Rapids
Palisade
Fargo
Moorhead
Detroit Lakes
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Duluth
Proctor
Cloquet
Wadena
Crow Wing
Cass
Mississippi River
Aitkin
Douglas
Cromwell
Carlton
Superior Terminal
Otter Tail
Ottertail
Wadena
Brainerd
Baxter
Wisconsin
Vineland
Minnesota Pipe Lines Corridor
Existing Electric Transmission Corridor
ENBRIDGE
LINE 3 REPLACEMENT PROJECT - PREFERRED ROUTE
N
Line 3 Replacement Route
Enbridge Mainline Corridor (Includes Existing Line 3)
Line 3R Proposed Pump Stations
Existing Enbridge Terminals
Enbridge Mainline System
Existing NDPC Pipelines
Minnesota Pipe Lines
Existing Electric Transmission Lines
Author: CMW
Date: 4/22/2015