

From: [Barry Babcock](#)
To: [*COMM Pipeline Comments](#)
Subject: Comment on Sandpiper Pipeline
Date: Wednesday, May 25, 2016 12:41:45 PM

To Those Concerned:

There are so many imposing dangers to placing oil pipelines through the water rich regions of northern Minnesota that a comment piece could go on for pages but I will specifically talk about the "last remaining wilderness on the Mississippi."

The first forty river miles on the Mississippi, from Itasca State Park to Beltrami County Road 7 is by all accounts, the last remaining wilderness on the 2,550 miles of this great river. Here, the water flows gin clear through boreal forests of jack pine, red pine, and spruce and through some of the richest and most diverse wetlands in North America.

<!--[if !supportLineBreakNewLine]-->

<!--[endif]-->

A Minnesota DNR inventory has identified species of threatened, endangered, or special concern; Timber Wolves, Trumpeter Swans nests in Beltrami County (protected species), Bald Eagle nests, Bog Adders Mouth (endangered species in Iron Springs Bog in Clearwater County), Hump Bladderwort (rare), Ramshead Orchid (a threatened species in Hubbard County), and two mussels of concern; the Creek Heel Splitter and Black Sand Shell Mussels. Clustered Burr Reed is rare species found here. A geologic feature unique to this area and is the LaSalle Tunnel Valley. The prolific wetlands here are home to a plethora of wetland species like the Virginia rail, which is of special concern, There is also a wide variety of ducks and other waterfowl.

Though the expansive wilderness doesn't compare to the one million acre Boundary Waters Canoe Area, the region still has enough wild and semi-wild lands left to give one the feeling of being in a remote and wild place. What it has that the BWCA does not is a more diverse community of both plants and animals. The region here has seen the deciduous and coniferous forests advance and retreat. With the retreats and advance in the timber line has come and gone the prairie. Three biomes come together here: prairie,

hardwoods, and conifers, which gives the added scope of diversity. The sandy and loamy soils also provide richer nutrients for the base layer on the pyramid of life. Other soils here have been acidified by jack pines for thousands of years, which has hampered diversity, but in turn these soils have become habitat for endangered species such as the Ramshead orchid and other species that favor these acid soils.

That the proposed pipeline route would cross the river within 15 miles of its source, through LaSalle Rec Area, and then run along the edge of Itasca State Park, the crowned jewel of Minnesota's state park system, is a looming threat that we deplore.

This is "Headwaters Country" in north central Minnesota and defines us, our land, our history; both Ojibwe and non-Indian.

The only ethical placement of this pipeline would be well outside of our water rich country of northern Minnesota. Even if the chances of a spill or leak occurring are extremely small, it is still not worth the risk in placing such an important region in jeopardy.

This river and park are not just state treasures, they are national treasures. Do not put in harms way an area that has come down through the ages to us as something that transcends commerce and energy. The ecological and cultural importance of this are vital to the well being of not only us humans but the plant and animal communities that inhabit this beautiful country.

Thank you;

Barry W. Babcock

38998 315th Ave

Laporte, MN 56461

solaris@paulbunyan.net



This email has been checked for viruses by Avast antivirus software.
www.avast.com

Doris Bandel



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Violation Tracker Parent Company Summary

Parent Company Name: Enbridge

Ownership Structure: publicly traded

Headquartered in: Texas

Industry: pipelines

Penalty total since 2010: \$6,548,688

Number of records: 15

Notes:

The penalty dollar total above may be adjusted to account for the fact that the list of entries below may include both agency records and settlement announcements for the same case; or else a penalty covering multiple locations may be listed in the individual records for each of the facilities. Duplicate penalty amounts are marked with an asterisk in the list below.

Associated Names:

DUFOUR PETROLEUM, LP; Enbridge, ENBRIDGE ENERGY LIMITED PARTNERSHIP, Enbridge Energy Partners LP, Enbridge Energy Partners, L.P., ENBRIDGE G & P (EAST TEXAS) LP; ENBRIDGE G&P (NORTH TEXAS) L.P.; ENBRIDGE PIPELINES (EAST TEXAS) L.P.; ENBRIDGE PIPELINES (OZARK) L.L.C.; ENBRIDGE PIPELINES (TEXAS GATHERING) L.P.; ENBRIDGE PIPELINES (TOLEDO) INC; ENBRIDGE PIPELINES EAST TEXAS MARQUEZ PLANT; ENBRIDGE PIPELINES TEXAS GATHERING LP / TEX OK CMPSR STA

Links:

For an overview of this company's accountability track record, read its Corporate Rep Sheet [here](#).

Subsidy Tracker data on financial assistance to this company by federal, state and local government agencies can be found [here](#).

Individual Penalty Records:

Download results as [CSV](#) or [XML](#)

Company	Facility State	Year	Agency	Penalty Amount
ENBRIDGE ENERGY LIMITED PARTNERSHIP		2012	PHMSA	\$3,699,200
Enbridge Energy Partners L.P.	Minnesota	2010	PHMSA	\$2,400,000
ENBRIDGE ENERGY LIMITED PARTNERSHIP		2012	PHMSA	\$112,500
ENBRIDGE G & P (EAST TEXAS) LP	Texas	2010	OSHA	\$96,480
ENBRIDGE PIPELINES (TOLEDO) INC		2012	PHMSA	\$68,600
ENBRIDGE PIPELINES EAST TEXAS MARQUEZ PLANT	Texas	2012	EPA	\$46,008
ENBRIDGE G&P (NORTH TEXAS) L.P.	Texas	2014	OSHA	\$32,850
ENBRIDGE PIPELINES (OZARK) L.L.C.		2010	PHMSA	\$28,800
DUFOUR PETROLEUM, LP	Mississippi	2011	FMCSA	\$18,010
ENBRIDGE PIPELINES (TEXAS GATHERING) L.P.	Texas	2014	OSHA	\$14,700
ENBRIDGE PIPELINES (EAST TEXAS) L.P.	Texas	2012	OSHA	\$8,800
Enbridge		2014	FRA	\$7,500
ENBRIDGE PIPELINES TEXAS GATHERING LP / TEX OK CMPSR STA	Oklahoma	2012	EPA	\$5,250
Enbridge Energy Partners L.P.		2012	FRA	\$5,000
Enbridge		2014	FRA	\$5,000

In 2009 the PHMSA [fined](http://primis.phmsa.dot.gov/comm/reports/enforce/documents/320076022/320075022_FinalOrder_06022009.pdf?nocache=2855) (http://primis.phmsa.dot.gov/comm/reports/enforce/documents/320076022/320075022_FinalOrder_06022009.pdf?nocache=2855) Enbridge Pipelines LLC-North Dakota \$105,000 for a 2007 accident that released more than 9,000 gallons of crude oil.

In March 2010 the PHMSA [proposed](http://primis.phmsa.dot.gov/comm/reports/enforce/documents/320076022/320075022_03032010.pdf?nocache=2601) (http://primis.phmsa.dot.gov/comm/reports/enforce/documents/320076022/320075022_03032010.pdf?nocache=2601) a fine of \$28,800 against Enbridge Pipelines LLC for safety violations in Oklahoma.

The huge Michigan spill occurred in July 2010 when an Enbridge pipeline in Michigan [ruptured](http://www.nytimes.com/2010/07/29/us/29michigan.html) (http://www.nytimes.com/2010/07/29/us/29michigan.html), sending more than 800,000 gallons of crude oil into the Kalamazoo River, a major state waterway that flows into Lake Michigan. Within a couple of days, the spill stretched for some 35 miles. The incident occurred only months after the company was [warned](http://online.wsj.com/article/SB10001424052748703578104575397742148887922.html) (http://online.wsj.com/article/SB10001424052748703578104575397742148887922.html) that it was not properly monitoring corrosion on the pipeline.

A few weeks after the accident, two members of Congress [asked](http://www.buffingtonline.com/html-wires/20100914/us-michigan-river-spill) (http://www.buffingtonline.com/html-wires/20100914/us-michigan-river-spill) Attorney General Eric Holder to look into allegations that Enbridge was pressuring Michigan residents affected by the spill to waive their right to sue the company in exchange for temporary housing, air purifiers and other immediate needs.

The PHMSA later [imposed](http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Press%20Release%20Files/phmsa1512.pdf) (http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Press%20Release%20Files/phmsa1512.pdf) a record civil penalty of \$3.7 million against Enbridge Energy, which it [said](http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Press%20Release%20Files/NTSB%20Enbridge%20Statement.pdf) (http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Files/Press%20Release%20Files/NTSB%20Enbridge%20Statement.pdf) exhibited a "lack of a safety culture." This was echoed in the findings of the National Transportation Safety Board, which [determined](http://www.ntsb.gov/doclib/reports/2012/201201201.pdf) (http://www.ntsb.gov/doclib/reports/2012/201201201.pdf) that it was not until 17 hours after the spill started that Enbridge began to take steps to address the problem. The NTSB chair was [quoted](http://www.ntsb.gov/news/2012/120710.html) (http://www.ntsb.gov/news/2012/120710.html) in an agency press release as saying: "This investigation identified a complete breakdown of safety at Enbridge. Their employees performed like Keystone Kops and failed to recognize their pipeline had ruptured and continued to pump crude into the environment."

While the controversy over the Michigan accident was still active, Enbridge experienced another [spill](http://yosemite.epa.gov/opadmpress.nsf/0/ABC3E5E9F620D6778525779A0003911D) (http://yosemite.epa.gov/opadmpress.nsf/0/ABC3E5E9F620D6778525779A0003911D) at one of its pipelines in Romeoville, Illinois, a suburb of Chicago.

The Michigan and Illinois accidents brought a spate of bad publicity for Enbridge, including a *Christian Science Monitor* [piece](http://www.csmonitor.com/USA/2010/0914/Oil-spills-hit-on-land-too-Aging-pipelines-imperil-Midwest) (http://www.csmonitor.com/USA/2010/0914/Oil-spills-hit-on-land-too-Aging-pipelines-imperil-Midwest) that referred to the company's "larnished reputation" and cited data showing that over the previous decade Enbridge had been responsible for more than 600 spills. A [report](http://www.polaris.org/~/media/Files/2010/07/07-29-national-35489771_1_enbridge-line-source-of-freight-crude-hazardous-materials-safety-administration) (http://www.polaris.org/~/media/Files/2010/07/07-29-national-35489771_1_enbridge-line-source-of-freight-crude-hazardous-materials-safety-administration) by the Polaris Institute put the number even higher—more than 800 spills between 1999 and 2010 in which some 6.8 million gallons of oil were spilled in the U.S. and Canada.

In December 2011 a Canadian judge [fined](http://www.cbc.ca/news/story/2011/12/23/enbridge-ordered-to-pay-875000.html) (http://www.cbc.ca/news/story/2011/12/23/enbridge-ordered-to-pay-875000.html) Enbridge C\$875,000 for safety violations linked to a 2003 natural gas pipeline explosion in Toronto that killed seven people.

In July 2012, less than a month after the publication of the damning National Transportation Safety Board report on the Michigan accident, an Enbridge pipeline in Wisconsin ruptured and spilled some 50,000 gallons of oil. One member of the U.S. Congress responded by [saying](http://articles.washingtonpost.com/2012-07-29/national/35489771_1_enbridge-line-source-of-freight-crude-hazardous-materials-safety-administration) (http://articles.washingtonpost.com/2012-07-29/national/35489771_1_enbridge-line-source-of-freight-crude-hazardous-materials-safety-administration): "Enbridge is fast becoming to the Midwest what BP was to the Gulf of Mexico." PHMSA [told](http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Press%20Releases/phmsa1812.pdf) (http://www.phmsa.dot.gov/staticfiles/PHMSA/DownloadableFiles/Press%20Releases/phmsa1812.pdf) the company not to reopen the pipeline until the agency had approved a plan for corrective action.

Enbridge's problems related to the Michigan incident are far from over. In March 2013 the U.S. EPA [ordered](http://yosemite.epa.gov/opadmpress.nsf/324e040292e1e51f85257358003f533a/19cdd21822f762cd86257b2e006ecbb9?opendocument) (http://yosemite.epa.gov/opadmpress.nsf/324e040292e1e51f85257358003f533a/19cdd21822f762cd86257b2e006ecbb9?opendocument) the company to perform additional dredging to remove oil from the Kalamazoo River, a process that Enbridge's U.S. affiliate [estimated](http://www.theglobefund.com/globe-investor/enbridge-clean-up-may-cost-1-billion-company-warns/article10041757/) (http://www.theglobefund.com/globe-investor/enbridge-clean-up-may-cost-1-billion-company-warns/article10041757/) could bring its total cleanup bill to nearly \$1 billion.

Apart from its safety record, Enbridge is targeted by environmentalists for its role in transporting crude oil from the controversial tar sand operations of northeastern Alberta, which are regarded as one of the largest contributors to global warming as well as a major source of air and water pollution and forest destruction. Enbridge's predecessor companies had some involvement in the tar sands as early as the 1970s. That role expanded greatly in the late 1990s, when Enbridge completed construction of an \$800 million expansion of its pipeline system to bring tar sands oil to Eastern Canada and the U.S. Midwest.

In recent years Enbridge has spent billions of dollars to expand its oil pipeline capacity, much of it dedicated to the tar sands industry. It is now proceeding with its Northern Gateway Project, which involves the construction of parallel pipelines from the Alberta tar sands region to the port of Kitimat on the Pacific shore of British Columbia.

[Pipelines and Salmon in Northern British Columbia](http://pubs.pembina.org/reports/pipelines-and-salmon-in-northern-bc-report.pdf) (<http://pubs.pembina.org/reports/pipelines-and-salmon-in-northern-bc-report.pdf>)
(Pembina Institute, October 2009).

Note: This page draws from a [corporate website](http://www.crocodile.com/uk/news.htm) (<http://www.crocodile.com/uk/news.htm>) originally prepared by the author for the Crocodyl website in July 2010.

Last updated April 11, 2013.

From: [Kelsey Barrick](#)
To: [*COMM Pipeline Comments](#)
Subject: Pipeline
Date: Thursday, May 26, 2016 9:45:14 AM

Please do not proceed with this mining project. If you have any soul whatsoever you will see the harm this will cause to our Mother and all its beings.

Peace,

Kelsey

From: [Keith Bartlett](#)
To: [*COMM Pipeline Comments](#)
Subject: Sandpiper and Line 3
Date: Wednesday, April 27, 2016 10:08:58 AM

I feel that a pipeline is the safest way to move the oil through our state. Current increase of oil being moved by rail is very concerning as it increases the chances of a spill by forces out of control by the carrier, by rails shifting causing derailment, by traffic at intersections that could cause derailment are two that come to mind with very little thought.

History has proven that pipeline have had considerable less spills than rail. The rail incidents have often led to intense fires as well as a spill. That would be devastating to the residents of Minnesota when we have a oil train derailment in a city that ignites into a fire.

Environmentally how much damaged is done to Minnesota with the increased rail traffic with that big engine spewing out massive amount of pollution out the exhaust as to compared to a few pumps running quietly in the middle of nowhere.

Keith Bartlett

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Jeff Bergeron
1834 West Chub Lake RD
Carlton, MN 55718

Jamie MacAlister, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Dear Jamie MacAlister:

I am writing in regards to the two proposed lines coming in close proximity of our South Boundary: Sandpiper 668/CN-13-473 and PPL-13-474; Line 3: PL-9/CN-14-916 and PPL-15-137. My wife and I have a one acre lot with three lines running through the west part of our property already. The lines are owned by Trans Canada. These lines are 36" to 42" in size and running at about 900 PSI. I had to contact Trans Canada to pound a fence post into the ground to install a fence for our garden. That just shows how close these lines are to our house.

It comes with great concern that Enbridge is now proposing to put two of their lines which will once again be in close proximity of our South Boundary property. These two lines are very concerning to us as they will have to cross the three lines owned by Trans Canada. I vividly recall in the 1990's when two gas lines located South of Carlton County land fill; South of Highway 210 and west of Highway Interstate 35 rubbed together and ruptured. Debris flew from the leak to both Interstate 35 and Highway 210. I am sure your office has this leak on record? The good news at that time was this area was not populated. However; in this current proposal not only my family but many others are within close range of the crossing of pipeline and I believe is located in Wetlands.

We have lived here for the past 33 years; raised our children and planned to retire in this house we made comfortable for ourselves. My concern and fear has raised to the point of offering Enbridge to purchase our property; not wanting to risk harm to my family if another leak were to occur. Enbridge declined purchasing our property and refused to offer any fair compensation due to their compensation rules.

It would be greatly appreciated and preferred if Enbridge would re-route these lines instead of having to follow utility electrical easement below our home. My wife, children and I would like to go on record as strongly opposing the Sandpiper and line 3 installation.

Sincerely from concerned property owners,

Jeffrey Bergeron

Bobbi Jo Bergeron

Jeffrey & Bobbi Jo Bergeron

218-565-8599

4-23-2016

RECEIVED

APR 28 2016

MAILROOM

From: [Joshua Bernstein](#)
To: [*COMM Pipeline Comments](#)
Subject: Pipeline Comment
Date: Monday, May 09, 2016 12:54:12 PM

Jamie MacAlister
Environmental Review Manager
Minnesota Department of Commerce
85 Seventh Place East, Suite 500
St. Paul, MN, 55101

May 9, 2016

Joshua A. Bernstein, Ph.D.
Assistant Professor
Department of English
University of Minnesota Duluth
410 Humanities, D155A
1201 Ordean Court
Duluth, MN 55812-3041
Office: 218-726-8549
Email: jbernste@d.umn.edu

To the Environmental Review Manager:

As an academic and a parent in Minnesota, I would like to urge you in the strongest possible terms to please reject the two proposed oil pipelines, the “Sandpiper” and “Line 3,” in Minnesota. There is simply no economic justification for the kinds of ecological and human health risks posed by these pipelines, as I believe any honest scientist or policymaker will attest. One need only look at Enbridge’s 2010 Kalamazoo River oil spill as evidence for what will likely occur in Minnesota if these pipelines are built. Apart from the incalculable ecological damage and human health effects caused by that spill, Enbridge, as I understand it, was initially fined only \$3.7 million for the accident, even though the full costs of cleanup were estimated in 2012 to be \$767 million. That ordinary citizens should have to foot the majority of the bill for that accident, particularly after suffering its effects, is, if true, nothing short of appalling. I am even more disturbed that, in light of that accident and many others of its sort, Enbridge could advance its proposals this far in Minnesota.

Although I know Enbridge and other interests have lobbied heavily to make these proposed pipelines in Minnesota sound feasible, please do not be duped by their efforts. The safety and wellbeing of millions of people, including future generations, depend on this decision, and I trust you will act accordingly. Finally, I don’t think you need reminding that the lands potentially affected by these pipelines constitute a national treasure, and, in many cases, the sacred heritage of Native Americans. Please do the responsible thing and reject these proposed pipelines immediately.

Sincerely,
Dr. Joshua Bernstein

From: [pamela bezotte"](#)
To: [*COMM Pipeline Comments](#)
Subject: Pipeline
Date: Tuesday, May 24, 2016 12:15:49 PM

I am writing in regards to the Pipeline proposal by Itasca State Park. I have lived around this area for years and I know the nature of the purity of the area, as well as the precariousness of water purity. Common sense alone speaks to an unwise decision of placing a potential pollutant into an area and at the source of a river that runs through our continent. An accident or leak into a major river straight from the river's source, which is where the pipeline is planned to run would be devastating to the whole continent. The pipeline could run in an area without a major river's source. The groundwater and all aquifers throughout MN are highly subject to pollutants even if the river itself is not seen (which I could not imagine) as a concern. Please listen to reason and common sense and do not risk the death of a major waterway. Thank you for your time.

Pamela Bezotte MSED
Sent from my iPhone

Vicki Bibeau

11 May 2016

I have lived over half of my life bordering the Chippewa National forest. I am a block away from the Mississippi River and a block from the original LINE 3 that runs along Highway 2 to Duluth which is 100 miles from my house in the forest. I have seen the Enbridge fires in Cohasset burning off the oil spill with huge black smoke for days floating west in the sky.

I am aware of the Oil spill in the Prairie River in Grand Rapids that was a major disaster. ^{and} We all should know about the recent oil spill near Clearbrook while there was still snow on the ground.

What about the abandonment of the original LINE 3? Enbridge is calling the proposed new pipeline "Sandpiper" but also wants to put in a new Line 3 along with it? The original LINE 3 along Highway 2 is planned to be abandon and abandoned oil pipes WILL corrode. Enbridge proposes to leave it there with no clean up what so ever? This is abandonment of a ^{soon to be} corrosive oil pipeline, I would compare this man-made problem to Flint Michigan with the lead in their poisoned water. its Pipeline Fatigue- you can't have any new toys until you get rid of the ones that are broken.... I think they should clean up that OLD LINE 3 before they put more pipelines in the ground.

Do we ^{^ All} know that Enbridge has changed their name on this project just for Sandpiper and now refer to themselves as North Dakota Pipeline Company? It might sound more "American" to the average citizen but it is STILL a foreign company from another country, right?

Are we all aware that Enbridge hired an AD company to create the maps that are ^{outside} _{in} this room and DOC is using them as displays?

Are the people who attend these meetings aware that, many times the Union workers (and some are bused in) are not from nor live IN Minnesota? Enbridge also has testified that this job will bring 22 permanent jobs. 22 jobs. That number is from Enbridge's testimony.

I am concerned that the 'hearings' for this new pipeline are only held during fall to spring and nothing in the summer when many people live up here at the lake & cabins and would certainly have something to say.

Most comments[^] on the Rail Road issue seems to be incorrect when I check the facts. The oil company buys the rail cars for the oil. I do know, that I would rather have a RR oil car derailed and spill a certain known amount of oil along a railroad track than a pipeline spill into the earth and water with an unknown amount of destruction creating an impossible total clean up especially in places you cannot get to easily.

I am offended by the "Maps" that Enbridge provides for this project. How can they help the EIS if MOST of the lakes and rivers are not shown on Enbridge's maps that many of their many oil pipelines run through. I suggest to all in this room that you google Minnesota lakes on a Map search and LOOK at the water & lakes. Then compare it to what maps Enbridge provides and posts on their website.

I travel routes that connect the watersheds, the lakes and the rivers, especially for the past two years traveling down to Saint Paul to the PUC's hearings, court battles and motions. It is a 400 mile round trip as so many in these Departments of Minnesota know very well by now.

It is a known fact that Enbridge has NO answers on how they plan to restore the many wild rice beds when a Oil spill occurs. You all do know that natural Wild Rice ONLY grows in Minnesota and along the Canadian and Wisconsin borders, right? You are aware that the black wild rice you can buy in the twin cities is not really Wild Rice from Minnesota, right?

You do understand that wild rice is harvested by two people IN a canoe in our lakes and rivers with 2 long sticks to knock each grain of wild rice into the canoe, right? And you know that people that LIVE up here, eat that rice several times a week if not daily to supplement their existence? It is one of the oldest and most traditional foods known on this continent. And only grows HERE in Minnesota in our lakes and rivers, totally naturally.

You cannot eat or drink oil or money.....

'Water will get you through times of no oil, BUT oil will not get you through times of NO Water'.

The oil spills, leaks, and releases will create a devastation in Minnesota

and down river to the gulf of Mexico that will last longer than your grandchildren's lifetime..... "so when they ask...."

My belief is that YOU as citizens of Minnesota and employees of Minnesota, listen and learn from all of us who come to these hearings and are fearless enough to give comment. WE want to believe that you will do your job and come to the reality that the EIS will show, prove and verify that a foreign oil company (from anywhere) can not buy itself in Minnesota by going through our lakes, rivers and land with destruction that will eventually come,,,,, from proof of the abandonment lines Enbridge could care less about.

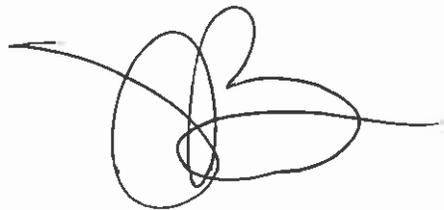
This must be the real EIS focus:

The Abandonment RISKS ~vs~ Enbridge profits...

And NOT just construction routes for the Environmental Impact Statement, BECAUSE Enbridge has TWO MORE OLD PIPELINES on Hwy 2 after this, that will also need to be replaced and not abandoned. Thank you.

And when all is said + done and it gets approved by the State of Minnesota it WILL be bigger than Keystone XL.

→ That is not a good thing for Minnesota.

A handwritten signature in black ink, consisting of a large, stylized letter 'B' with a horizontal line extending to the right.

Jamie MacAlister
Environmental Review Manager
MN Department of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

Re: Comments on Sandpiper/Line 3 EIS scoping , Docket #s PL-6668/CN- 13-473 and PPL-13- 474, Line 3: PL-9/CN-14- 916 and PPL-15- 137)

May 26, 2016

Dear Mr. MacAlister:

Thank you for the opportunity to comment on the proposed Sandpiper and Line 3. I am a professional freshwater ecologist, with M.S. and PhD degrees in Conservation Biology from the University of Minnesota- St. Paul, Department of Fisheries, Wildlife, and Conservation Biology. My professional career has been devoted to protecting clean water, healthy watersheds and aquatic ecosystems. Protecting clean water and healthy lake and river systems benefits both conservation and human welfare in Minnesota (e.g. sense of well-being, long-term social and economic health).

In addition to my professional expertise, I am a landowner on an existing pipeline easement. My property lies on the Todd/Morrison County border crossed by four Koch pipelines that run from Clearbrook to Koch terminal in St. Paul. Koch is currently building a new pumping station on a property adjacent to mine in order to move more oil at higher pressure. Therefore, I have ongoing personal experience with what it means to have one's own private property, which one has attempted to properly steward and care for, appropriated by eminent domain, subject to reduced property values, reduced future options, and living with the ever-present risk. It is even possible that I would be affected personally by at least one of the proposed alternate routes for Sandpiper.

The following comments represent my personal opinion alone--a perspective that is rooted deeply in both my direct experience as a landowner and informed by my professional expertise in the environmental field.

The proposed Sandpiper pipeline consists of approximately 616 miles of new 24-inch- and 30-inch-diameter pipeline, from North Dakota, Minnesota, and Wisconsin and terminating at the existing Enbridge Superior station and terminal facility near Superior, Wisconsin. In Minnesota, approximately 303 miles of new 24-inch- and 30-inch-diameter, underground crude oil (from the Bakken) pipeline would be constructed along the SPP route. In Minnesota, there would be approximately 73 miles of new 24-inch-diameter pipeline (average capacity of 225,000 barrels per day ["bpd"]), beginning at the North Dakota-Minnesota state line near Grand Forks, North Dakota, and extending to a new terminal near Clearbrook, Minnesota. The proposed Sandpiper corridor enters Minnesota just south of Grand Forks,

North Dakota. It heads east to Enbridge's Clearbrook terminal and then south toward Park Rapids along an existing crude oil corridor. South of Park Rapids, the pipeline would follow a transmission line corridor to Superior, Wisconsin. The proposed Line 3 replacement involves approximately 337.1 miles of new 36-inch diameter, underground crude oil (light, medium, and heavy crude) pipeline constructed along the L3R route between the North Dakota/Minnesota border and the Minnesota/Wisconsin border. Both projects involve substantial disturbance along an entirely new pipeline corridor that cuts across what citizens and agencies have all identified as some of the highest quality lake, river, wetland, wild rice, and forested watershed habitats remaining in Minnesota, including areas identified as high conservation priority under the 2015 update to the State Wildlife Action Plan and many, many lakes and watersheds identified as high priorities for protection through the MPCA's recent Watershed Restoration and Protection Strategy development processes being conducted in each of the state's major watersheds.

The EIS has identified issues of concern as limited to (1) Spill analysis, (2) Groundwater, (3) Surface Water Resources ; (4) Wild Rice, (5) Tribal Concerns , and (6) Pipeline Decommissioning.

Certainly each of these is a critical issue and should be thoroughly examined in the EIS. Both the long-term impacts of the pipeline, as well as the potential acute and chronic effects of any releases should be evaluated. The effects of oil releases on aquatic systems may be far-reaching. The EIS should address impacts to habitat, wetlands, lake and river shores, streambeds, and lake bottoms; potential groundwater contamination ; contamination of wildlife; and fate and transfer of spills and degradation products where effects may persist for years, such as marshes, backwaters, and sensitive shorelands¹.

With respect to pipeline decommissioning, I am disturbed that the Line 3 replacement proposal seeks to follow the new Sandpiper route through some of Minnesota's highest quality and highest biodiversity lakes, wetlands, and northern forests, rather than remove and replace the problematic existing pipeline that is being abandoned with completely inadequate monitoring and oversight. This is simply unacceptable.

However, to this list of issues I would add consideration in much greater depth of (7) habitat fragmentation and loss, especially the cumulative effects of habitat fragmentation and loss; and (8) implications for and from climate change.

7) The first issue – cumulative effects of habitat loss – is recognized in nearly every article and conservation biology textbook as one of the most significant threats to biodiversity globally. Ecological research is clear on this point: habitat loss, fragmentation and degradation are one of the most significant issues in natural resources management and conservation². These effects apply to roads and

¹ Pezeschki et al. 2000, Kingston 2002

² MacArthur and Wilson 1967, Ricklefs and Miller 2000, Noss and Cooperrider 1996; Stein, Kutner, and Adams 2000; Forman et al. 2002; Hilty et al 2006; Groves and Game 2015 (Craig R. Groves , Edward T. Game. 2015. Conservation Planning: Informed Decisions for a Healthier Planet. MacMillan Publishing, Greenwood Village, CO.)

corridors and also provide vectors for introduction of nuisance and invasive species. The assessment of the effects of forest and wetland fragmentation should be included, given the amount of new corridor disturbance proposed by this project/route. Public record comments on pipeline projects in the eastern U.S. (including the proposed Atlantic Coast Pipeline (ACP) and associated projects), have included a compelling case for the assessment of cumulative habitat effects, programmatic approaches to large-scale energy infrastructure, and landscape-scale application of the mitigation hierarchy (avoidance, minimization, and measures to offset or compensate) for energy and other infrastructure development. President Obama's Executive Order 13604 and the May 2013 Presidential Memorandum (PM) on "Modernizing Federal Infrastructure Review and Permitting Regulations, Policies, and Procedures" specifically calls for these measures, which should be applied to the Sandpiper EIS also.

8) Implications of Sandpiper and Line 3 for and from climate change. Pursuing the path implied by development of these and other new pipelines—continued business-as-usual in terms of piecemeal projects and infrastructure development aimed at extracting the next big source of potentially economically recoverable fossil fuels-- represents an unsustainable path that in conjunction with all the other projects is propelling us towards the very real possibility of sudden, irreversible, catastrophic and sudden, severe climate change. Nearly all scientists who have looked at the potential paths out of this crisis agree—to avoid calamitous warming beyond 2-4 °C will require making the transition to renewable fuels more rapidly than we have ever previously imagined, along with protecting and restoring a significant amount of "Nature" to reverse the trend and re-capture carbon in storage. I agree with the three basic concerns outlined by MN350, an organization that is providing much-needed leadership on climate change. As an individual and a scientist who has devoted my career and personal life to conservation, environmental and sustainability issues, I consider climate change to be the most significant threat facing humanity perhaps in the entire history of civilization.

Climate change reality and Carbon impacts of Tar Sands Oil

The growing consensus among climate scientists is that in order to avoid the worst case scenarios of runaway climate change (> 10 °C global temperature increases; massive and abrupt sea level rise) we need to shift away from fossil fuels as fast as possible³. Construction of new pipelines to continue extraction of shale oil and tar sands oil from remaining reserves is potentially incompatible with the strategies needed to reduce emissions to a level that may avoid the worst impacts of climate change. The only way to create the demand, the jobs, and the momentum for the transition is to ensure that new fossil fuel developments internalize the cost they are imposing on future generations. Even if there are supply constraints, and prices increase, that would only hasten the reduction in use and the transition to renewable sources.

Oil sands, on a "well-to-wheels" basis, have at least 15 to 20 percent higher greenhouse emissions than conventional oil. In Canada, the region of the world that is being exploited for oil shales is part of the

³ <http://www.theguardian.com/environment/2016/may/23/world-could-warm-by-massive-10c-if-all-fossil-fuels-are-burned>

vast boreal region that has been an essential carbon sink. The very act of developing the infrastructure to extract tar sands in the first place liquidates an enormous carbon sink right off the bat. In 2012, analysis showed Canada failing to meet its globally agreed-to targets for emissions reductions expansion by 50%, primarily because of oil sands expansion.⁴

Water pollution and other waste concerns plague mining-based projects that produce large volumes of tailings that have negative consequences for communities, especially native communities, at the source.⁵ This is also a concern in the Bakken region where water resources are already under significant pressure.

Given the need—universally acknowledged by climate change scientists—to make the most aggressive possible switch to alternative renewable sources of energy and away from fossil fuels as soon as possible, there is significant question as to whether there can be considered any public need or public benefit from new pipeline infrastructure. Given the existing economic climate for fossil fuels, the benefit may not even accrue in the short-term, as these projects may not even really be needed to meet current demand. Enbridge itself has indicated its intent and desire to move beyond oil sands dependency beyond 2019.⁶ Some analysts have projected that long-term demand for oil may be dramatically lower than the oil industry's projections⁷, if the world moves to restrict carbon emissions in the face of rapidly emerging disasters and unfolding evidence. As a result of decades of opposition, Canada appears to be questioning its own decision to pursue tar sands development full-bore. And as price volatility impacts oil producers, often pipeline safety and maintenance are the casualties, compounding the negative impacts. Already Enbridge has shown some signs of vulnerability, both in repeated, demonstrated pipeline safety failures and leaks, as well as its inability and/or unwillingness to responsibly deal with the existing Line 3 by replacing the current failing pipeline, and/or completely removing it and mitigating the damage it has caused. Liability for these damages is also the liability Minnesotans face if Enbridge is unable in the future to honor its financial and legal obligations and commitments with respect to pipeline safety, maintenance, spill prevention (and/or cleanup), decommissioning, and environmental mitigation.

Process concerns

I agree with those who have argued that the responsibility under law and rule of the DOC is to advocate for the public's best interest in matters that could potentially impact water resources that are among the most highly valued assets of Minnesotans in terms of our quality of life, culture, and our economies. I question the DOC's adoption of Enbridge's private purpose route as the "Project Purpose" in the draft Scoping document. The company hired to do the EIS, Cardno, has a longstanding client relationship with Enbridge and as such is not a disinterested party. As early as 2011, a *New York Times* article questioned

⁴ <http://www.pembina.org/blog/668>

⁵ <http://www.circleofblue.org/waternews/2010/world/tarsandsoilproductionisanindustrialbonanzaposesmajorwaterusechallenges/>

⁶ <http://www.nationalobserver.com/2016/02/19/news/enbridge-wants-break-its-oilsands-addiction>

⁷ <http://oilprice.com/Energy/Energy-General/What-The-Oil-And-Gas-Industry-Is-Not-Telling-Investors.html>

the appointment of Cardno to the review of Keystone XL based on demonstrable instances of conflict of interest.⁸ Finally, I am concerned about the lack of assurance that the MPCA and DNR will participate in the preparation of the EIS.

Tribal Rights

I support the full exercise of Tribal and Treaty rights for Native Americans in Minnesota, including the White Earth Band and Leech Lake Band of Ojibwe. The U.N. Declaration on the Rights of Indigenous Peoples requires States to consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free, prior and informed consent before adopting and implementing legislative or administrative measures that may affect them (article 19). States must have consent as the *objective* of consultation before the undertaking of projects that affect indigenous peoples' rights to land, territory and resources, including mining and other utilization or exploitation of resources (article 32).⁹ The proposed pipeline affects many resources (wild rice, fish, gathering) and lands potentially impacted by the new pipeline route. International standards require a prior agreement from the Bands that the process for the EIS will be adequate.

Enbridge Safety Record:

Enbridge has a notably poor safety record. For example, in a document from May 6, 2014, the Pipeline and Hazardous Materials Safety Administration held Enbridge up as the industry model of what not to do.¹⁰ After the fatal accident on Line 3 repairs in November 2007 in Clearbrook, MN, Enbridge was cited for failing to safely and adequately perform maintenance and repair activities, clear the designated area from possible sources of ignition, and hire properly trained and qualified workers. Additional incidents include 6,000 barrels spilled from a pipeline that ruptured in a marsh in Itasca County (July 4, 2002, Cohasset, MN); 8,810 barrels leaked in Plummer, MN September 22, 1998; and 40,500 barrels leaked in Grand Rapids, MN, March 2, 1991. That's not to mention Enbridge's responsibility for the largest release in U.S. history at Kalamazoo, MI, a spill which is still in litigation.

Enbridge has routinely downplayed the actual risks of a spill happening at some point, somewhere, along the pipeline. Regarding the potential risks of the Keystone XL pipeline, Professor Meshkati wrote for the New York Times that "human error" is inevitable in the foreseeable future, despite increasing levels of computerization and automation, given that such complex systems will operate under the centralized control of a few human operators." To improve pipeline safety would require "total systems reorientation through strengthening the regulatory oversight and improving the management of pipeline technology. Above all, we need to devise a robust organizational and operating system, nurture a strong safety culture and improve human-systems integration."^{11,12} UT professor Mohammad Najafi

⁸ http://www.nytimes.com/2011/10/08/science/earth/08pipeline.html?_r=0

⁹ <http://www.ohchr.org/Documents/Issues/IPeoples/FreePriorandInformedConsent.pdf>

¹⁰ <https://www.federalregister.gov/articles/2014/05/06/2014-10248/pipeline-safety-lessons-learned-from-the-release-at-marshall-michigan>

¹¹ <http://www.nytimes.com/roomfordebate/2011/10/03/what-are-the-risks-of-the-keystone-xl-pipeline-project/no-technology-is-risk-free>

asked why we should take the risk, given that “the oil extracted from a sensitive wilderness is not worth the possible costs.”

I think this is a critical juncture for Minnesotans, and the nation as a whole. On behalf of *all* Minnesotans, current and future, we need to ensure thorough and responsible consideration of the project and the alternatives, and choose the best path forward.

Thank you for your service to the citizens of the State of Minnesota.
Respectfully submitted,

Kristen Blann, Ph.D.
40234 US 10
Cushing, MN 56443

From: [Jerry Bond](#)
To: [*COMM Pipeline Comments](#)
Subject: Scoping EIS comment for Sandpiper (13-473 & 13-474) and Line 3 Replacement (14-916 & 15-137)
Date: Friday, May 06, 2016 9:50:07 AM

Dear Ms. MacAlister,

We need safe pipeline infrastructure to safely transport these products! Safer than railway or truck transportation by far. Need independence from foreign gas at oil. Put your money on American construction that is so much safer than previous built pipelines that are in use to this day. Thank you and God bless America

Sincerely,

Jerry Bond
525 Jordan Ct
Olive Hill, KY 41164
jabond63@yahoo.com

RECEIVED

MAY 26 2016

MAILROOM

Date: May 25, 2016

To: Minnesota Department of Commerce
Attn: Jamie Macalister – Environmental Review Manager

From: Dawn Bourdeaux
Trustee for Erie – Bourdeaux Family Revocable Trust
MN-CL-011.000, MN-CL-012.000, MN-CL-014.000

RE: Enbridge Sandpiper, Line 3 replacement, Clearbrook West 115 kV Transmission Line and Clearbrook West Terminal (New Tank Farm for Sandpiper)
PUC Docket Numbers: PL-9/CN-14-916
PUC Docket Numbers: PL-9/PPL-15-137
PUC Docket Numbers: ET/TL -14-665
PUC Docket Numbers: PL6668/PPL-13-474

Thank you for the opportunity to comment at the Public Scoping meeting in St Paul.

Can you please put comments in all the PUC Dockets for Sandpiper, Line 3 replacement, Clearbrook West 115 kV Transmission and Clearbrook West Terminal - #PL-9/CN-14-916, #PL-9/PPL-15-137, ET/TL-14-665, PL6668/PPL-13-474?

I am writing in regards to the following properties **MN-CL-001.000, MN-CL-012.000 and MN-CL-014.000 (Erie – Bourdeaux Family Revocable Trust)** off of Taflin Lake Road in Pine Lake Township in Clearwater County. Currently going through the properties are EPP Corridor (7 lines) and NDPC Line 81. With the replacement line 3 and Sandpiper we will have 10 pipelines and they have also a 115 kV Transmission Line going through our properties. We are OVER fatigued with the amount of pipelines going through our properties already. For the Line 3 replacement line they want to change routes when the line leaves Clearbrook, because of fatigued, it is already fatigued before it gets to the Clearbrook Terminal. The route needs to change before you even get to Clearbrook, because of the same reasons Enbridge does not want to follow the current line 3 route to Superior, WI. The line 3 replacement line should follow the current route for line 3 exactly and the old pipes removed.

All the following projects are phased and connected actions and need to be in the EIS (Environmental Impact Statement): Sandpiper – docket #13-474, Line 3 replacement – docket #15-137, Clearbrook West 115 kV Transmission line – docket #14-665 and Clearbrook West Terminal (New Tank Farm for Sandpiper.) All routes and alternatives must be considered in the EIS, for ALL of these phased and connected projects.

Enbridge has purchased the following property MN-CL-013.200 for a new tank farm for the Sandpiper Line. Enbridge can NOT access the Sandpiper Line or NDPC Line 81 on this property. For their tank farm to work, they need to defer the pipes from our properties. Currently **Enbridge has an easement for the Sandpiper Line to go straight through the properties ID # MN-CL-011.000, MN-CL-012.000 and MN-CL-014.000 (as seen on attached map) and want that easement honored and not to follow the proposed sandpiper line to defer the pipes into their new tank farm on ID #MN-CL-013.200.** If they defer the sandpiper line over to the new tank farm, then we are losing valuable farming land, because the land is never the same once they dig. We have lost our valuable soil on other parts of our farms due to Enbridge's digging and them putting the clay base on top. I do not understand why Enbridge would purchase land that they cannot access the Sandpiper Line on their own property. On September 9, 2015 we were asked for even more easement land

because Enbridge wants to have NDPC Line 81 go into the new tank farm. Our family should not have the burden of losing our excellent agriculture land in order for Enbridge to get their new tank farm.

An EIS (Environmental Impact Statement) study needs to be done first on Enbridge's new tank farm on MN-CL-013.200, before a Certificate of Need or Route Permit is issued. There are two lakes very close to the proposed new tank farm and are the Erie Lake and Klongerbo Lake. Currently on the Erie Lake there are 12 trumpeter swans. Each year more trumpeter swans are on Erie Lake. We also have eagles between the lakes and even an eagle nest on property MN-CL-011.000. Also there are all kinds of wildlife on these properties. On Lake Erie we have springs and a hot springs. The springs stay open year round. The temperature does not matter; they are always open, even when it is 60 below 0.

Property ID # MN-CL-014.000 is going to be a CENTURY FARM for our family in January 2017.

Between the Sandpiper line being very close to the homestead building site and power lines that would start to go through the homestead that Enbridge and Minnkota Power want. It has been in our family planning that we are going to be rebuilding on the old homestead in the next 5 years. Currently the old farm house is standing. The farm is so important to our family and our heritage. Our family wants to keep our farm homestead (future century farm) free of power lines and pipelines. **The land has provided our family an agriculture living for 99 ½ years.** It will soon be a Century Farm in the State Of Minnesota and we need to be able to receive that honor and be able to pass the farm down to future generations.

On Line 3 replacement line move the workstation over to Enbridge property ID # MN-CL-013.200 and not on Erie – Bourdeaux Family Revocable Trust property ID # MN-CL-014.000.

Currently we are waiting to be paid for two death certificates for my mother Marilyn Erie (passed away April 8, 2014), which have been given to Enbridge and they even asked for a third certificate because they have missed place two death certificates already. I have been called my mother name just in August 2015, which is very difficult. Why can't Enbridge get their paperwork correct, especially since they have received death certificates? Also we are waiting on payment for crop damage back in 2013. Enbridge has said they want to put the crop damage payment into the new proposed easement for the new tank farm. Why should we have to wait for crop damage money, when we have turned in the paperwork for the damages? Also my father Harvey Erie was told if we sign the easements for the new proposed sandpiper line to go into Enbridge new tank farm, we would get the hay crop for 2015 off of Enbridge's property MN-CL-013.200, when the agent left, my father went to check the cattle and the previous renter was already cutting the hay on Enbridge's new tank farm property. Enbridge never planned on the Erie – Bourdeaux Family Revocable Trust to receive the hay off their property (MN-CL-013.200) in 2015 as part of the easement agreement, because nothing was ever in writing, just verbal by Enbridge. Enbridge representative did not bring anything in writing from Enbridge and would not put anything in writing for the hay crop land, but kept telling my dad we could have the hay crops off the land for 2015 for us signing the easements that day.

With ALL the tanks at the Clearbrook Terminal and the new Clearbrook West Terminal and pipelines, SAFETY NEEDS TO BE ADDRESSED. When my mom passed away on April 8, 2014, there were no Fire Fighters from the Gonvick Fire Department to come out for the call. **ALL the fire fighters are volunteers and we understand they cannot be available at all times.** They need to make a living to support their families. Just south of Clearbrook two men lost their lives due to an explosion while repairing a line. **Need to have first responders available at ALL times to handle any kind of emergency from the pipelines, tank farms, transmission lines and etc.**

I do not feel that Enbridge can put up a new tank farm on property ID # MN-CL-013.200, when they cannot access the Sandpiper Line or NDPC Line 81. By looking at the maps, Enbridge knew they could not access the Sandpiper Line or NDPC Line 81 on the property ID # MN-CL-013.200 they purchased. **Enbridge needs to honor the easement that they asked for and received by Harvey and Marilyn Erie back in November 2013 for the Sandpiper Line to go straight through the Erie – Bourdeaux Family Revocable Trust properties.** Also an Environmental Impact Statement needs cover the connected projects for the new tank farm & Clearbrook West 115 kV Transmission Line before a certificate of need or route permit are granted.

Also we have concerned with the EPP Corridor (7 lines, 8 with replacement line 3), Line 81 and Sandpiper with the amount of pipe and the 115 kV transmission line for stray voltage. Also have great concern with paralleling pipelines with transmission would lead to corrosion of the pipeline.

Animal disease from property # MN-CL-015.000 to our property. We'll need to work with the MN State Veterinary and make sure no animal disease get on our property. All equipment will need to be cleaned and cannot come back and far between the properties. Soil cannot be exchange or moved. Our breeding of cattle can go back just as far as our old farm (MN-CL-014.000) will be a **CENTURY FARM** in January 2017. You cannot replace our herd of cattle or our century farm.

On Erie Lake (MN-CL-013.000 and MN-CL-014.000) and Klongerbo Lake (MN-CL-014.000) we have shoreline rules. On both Erie Lake and Klongerbo Lake we have 150 feet setback around all the lakes. Also the wetlands connected to Erie Lake. Also on properties MN-CL.011.000, MN-CL.013.000 and MN-CL-014.000 have restricted use. Lake Erie provides fresh water for wildlife (Swans, Ducks, Deer, Eagles, Beavers, etc.) and the beef cattle.

Minnesota needs to also include LANDOWNER PROTECTIONS rules/terms/conditions. Example Iowa Utilities Board placed terms & conditions, along with \$25 million on their permit for the Dakota Access Pipeline. Landowners need to have protection for their property.

Environmental:

- Consider the corrosive nature and impacts of electrical transmission when run parallel to pipelines.
- Proposed route – 900 foot route (Clearbrook West 115 kV Transmission Line) route width on Erie-Bourdeaux Revocable Trust property demonstrates routing challenges in appropriateness and Minnesota's proposed route.
- Safety to access powerlines and pipelines.

EIS (Environmental Impact Statement):

- Protections of ALL Lakes and Wetlands.
- Human Settlement
- Cultural Values
- Tourism
- Long term farming
- Century farm for Erie – Bourdeaux Families
- Long Standing Family Farms
- Loss of two home sites
- EIS address displacement of livestock, pasture and loss of pasture land.
- Noise

- Public Health and Safety
- Recreation
- Socioeconomics - EIS to address loss of building sites, loss of property value, loss of value as residential and future development, loss of value for agricultural production and gravel mining.)
- Land Base Economies (Agriculture, Forestry, Mining)
- Timing of Projects (If all projects are going at once, we will be unable to farm the land and have no crops or hay for cattle.) Puts our farm out of business.
- Air
- Geology
- Groundwater – high water tables. Showing links between groundwater, surface water and wetlands. Includes the springs and hot springs on the Erie – Bourdeaux Property.
- Rare and Unique Resources – including sensitive/protected resources.
- Vegetation – clearing impacts, potential pesticide use on RoW.
- Wildlife and Wildlife Habitat. Also address potential for USFWS recommendation of eagle take permit and bat take permit. Eagles nests on Erie – Bourdeaux property.
- EIS address that Minnesota Pollution Control Agency recommended consideration of alternative for tank farm near Crookston for the Sandpiper Terminal and Pumping Station proposed for Clearbrook West Terminal.
- **Pipeline Route Alternatives – FOH SA-04 and MPCA SA-03**

I have also attached maps of the property's, letter, water feature maps, USDA map, and route alternatives being discussed in this letter.

Thank you for your time and consideration in this matter.

Sincerely,



Dawn Bourdeaux

Trustee for Erie – Bourdeaux Family Revocable Trust
 31187 151st Street
 Princeton MN 55371

Enbridge Sandpiper & Line 3 replacement
 PUC Docket Numbers: PL-9/CN-14-916 Certificate of Need
 PUC Docket Numbers: PL-9/PPL-15-137 Route Permit
 PUC Docket Numbers: ET/TL -14-665 Clearbrook West 115 kV Transmission
 Clearbrook West Terminal
 PUC Docket Numbers: PL6668/PPL-13-474

Exhibit A

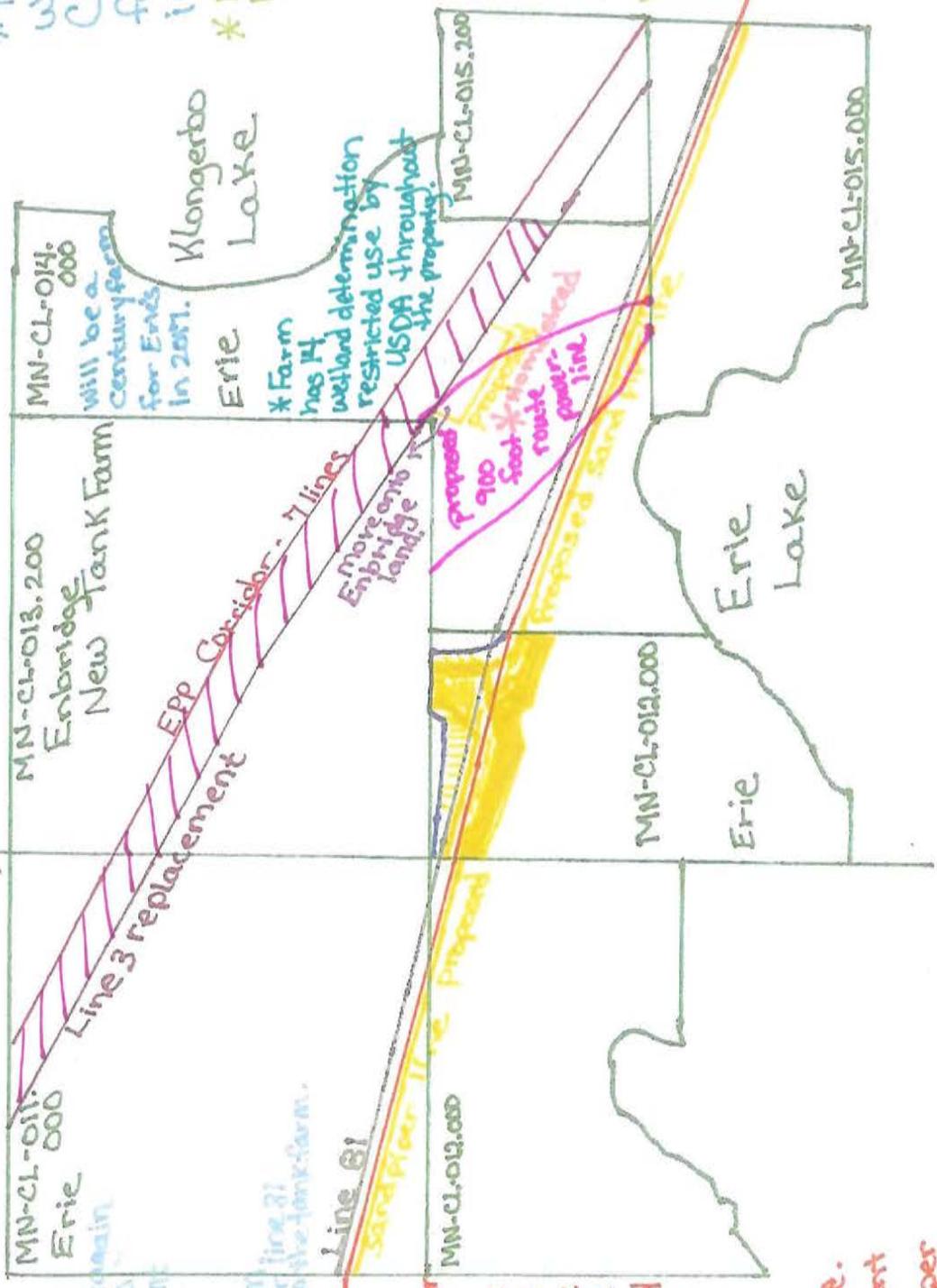
- Property Maps
- Enbridge to honor easement already given to go straight through the Erie – Bourdeaux property and not have lines go into the New Clearbrook West Terminal.
- Alternative Route A & B for Sandpiper and Line 81 going into and out of the New Clearbrook West Terminal.
- Letter written by Mark Erie
- Erie – Bourdeaux Soil – given out at family reunion.

PUC Docket Numbers: PL-9/CV-14-916
 PL-9/PPL-15-137
 C N-13-473
 PPL-13-474
 Docket # 14-605
 ET-6/PZ-14-605

Erie - Bourdeaux Family
 Revocable Trust
 MN-CL-011.000
 MN-CL-014.000
 MN-CL-013.000

- Yellow** - Sandpiper proposed route
- Orange** - Easement already given for Sandpiper line
- Silver** - line 81
- Dark Red** - line 3 replacement
- Red** - EPP corridor

* Homestead on Old Farm



* MN-CL-014.000 will be a Century Farm for our family in 2017.
 * Enbridge and Minnkota Power also want easement for High Voltage lines through Erie properties, Separated from all the land easements for the proposed Sandpiper Line. **DO NOT** want high voltage lines on our properties.

Easement Enbridge has for the Sandpiper line through Erie - Bourdeaux Family Revocable Trust properties.

* Enbridge just asked for more easement on line 31 in the New Tank Farm. Management for the Sandpiper line is in the New Tank Farm.

Easement given to Enbridge for the Sandpiper line, by Harvey + Marilyn Erie Nov. 2013. Want Enbridge to follow the easement they already have and not to follow the proposed Sandpiper line. **DO NOT** want the Sandpiper Proposed Line/centerline. Enbridge wants way to much easement for the Sandpiper line to go straight through, that easements Erie's already given easement for the Sandpiper Proposed line to happen, need to follow easement already have. needs to be horizontal and not to let the Sandpiper Proposed line to happen, need to follow easement already have.

Erie - Bourdeaux



Legend

- Sandpaper Proposed Centerline
- Line 3 Replacement
- Sandpaper ATWS
- Line 3 Replacement ATWS
- Sandpaper TWS
- Line 3 Replacement TWS
- Tract Boundary

*** gravel pit would be about here**
 Harvey Erie Tracts

NORTH DAKOTA PIPELINE COMPANY LLC
 Proposed Sandpaper Alignment

0 100 200 Feet

Erie-Bourdeaux



NORTH DAKOTA
PIPELINE COMPANY LLC
 Proposed Sandpaper Alignment

Legend

- Sandpaper Proposed Centerline
- Line 3 Replacement
- Sandpaper ATWS
- Line 3 Replacement ATWS
- Sandpaper TWS
- Line 3 Replacement TWS
- Tract Boundary
- NDPC Line 01
- EEP Corridor
- Harvey Erie Tracts

** We want Enbridge to honor the easement that they asked for and signed by Harvey + Marilyn Erie for the Sandpaper to go straight through our property. Enbridge to honor easement for Sandpaper signed for already.*

Erie-Bourdeaux properties

(A)

Route Sandpiper Alternative and Line 81



NORTH DAKOTA PIPELINE COMPANY LLC
 Proposed Sandpiper Alignment

Legend

- Sandpiper Proposed Centerline
- Line 3 Replacement
- NDFC Line 81
- ▭ Sandpiper ATWS
- ▭ Line 3 Replacement ATWS
- ▭ EEP Corridor
- ▭ Sandpiper TWS
- ▭ Line 3 Replacement TWS
- ▭ Tract Boundary
- ▭ Harvey Eide Tracts

* MN-CL-013.000 is our best agricultural field.

Eric
Bourgeois
Properties

Route Sandpiper + Line 81 Alternative B



NORTH DAKOTA
PIPELINE COMPANY LLC
Proposed Sandpiper Alignment

**Route Alternative would not
have Sandpiper and line 81
on MN-CL-013.000.**

- Sandpiper Proposed Centerline
- Sandpiper ATWS
- Sandpiper TWS
- Line 3 Replacement
- Line 3 Replacement ATWS
- Line 3 Replacement TWS
- NDPC Line 81
- EEP Corridor
- Tract Boundary

* MN-CL-013.000 is our best agricultural field.
* Miss wetlands
* Miss Century Farm Homestead
* Timing of projects still would
have all MN-CL-013.000 to farm
and more pasture land.

Fire-
beamix

Powerline - 115 kv transmission - 900ft - wetland



Google Earth

© 2015 Google

Imagery Date: 4/14/2015 47°42'32.29" N 95°29'08.05" W elev 1294 ft eye alt 5276

1991



Google earth

miles
km

1

What the Farm Means to Our Family

Some say Farmers don't care about their land and are consistently aiming to make it the more productive without considering the impacts. This couldn't be farther from the truth for our family farm. The original Farmstead has been in our family for almost 100 years. It's been our pride and joy and its part of my families past, present, and future.

Watching a sunset with cows and crops filling the view is so extremely peaceful. Or seeing a deer in the distance or a bald eagle flying overhead and then my favorite a white swan swimming in the lake always makes me feel very privileged to be stewards of such a beautiful piece of land.

As a kid I spent a lot of time with my grandpa and his passion for the land was passed down to my dad and my siblings. And grandpa probably got his passion from great grandpa. I have deep and wonderful memories of being on the farm. Respect for the land runs deep in my family.

Written by:
Mark Erie

Erie-Bourdeaux Soil

This soil is from the Erie Family Farm.
It is rich in success, hard work, and
family love. Spread this dirt in your
flower garden and you will always be
close to your Erie heritage and home.

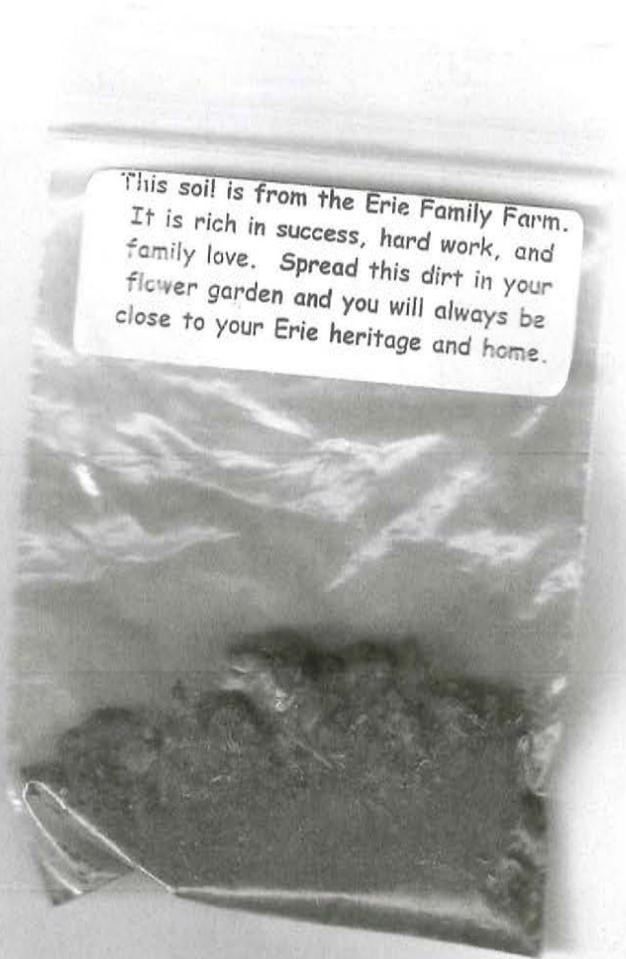
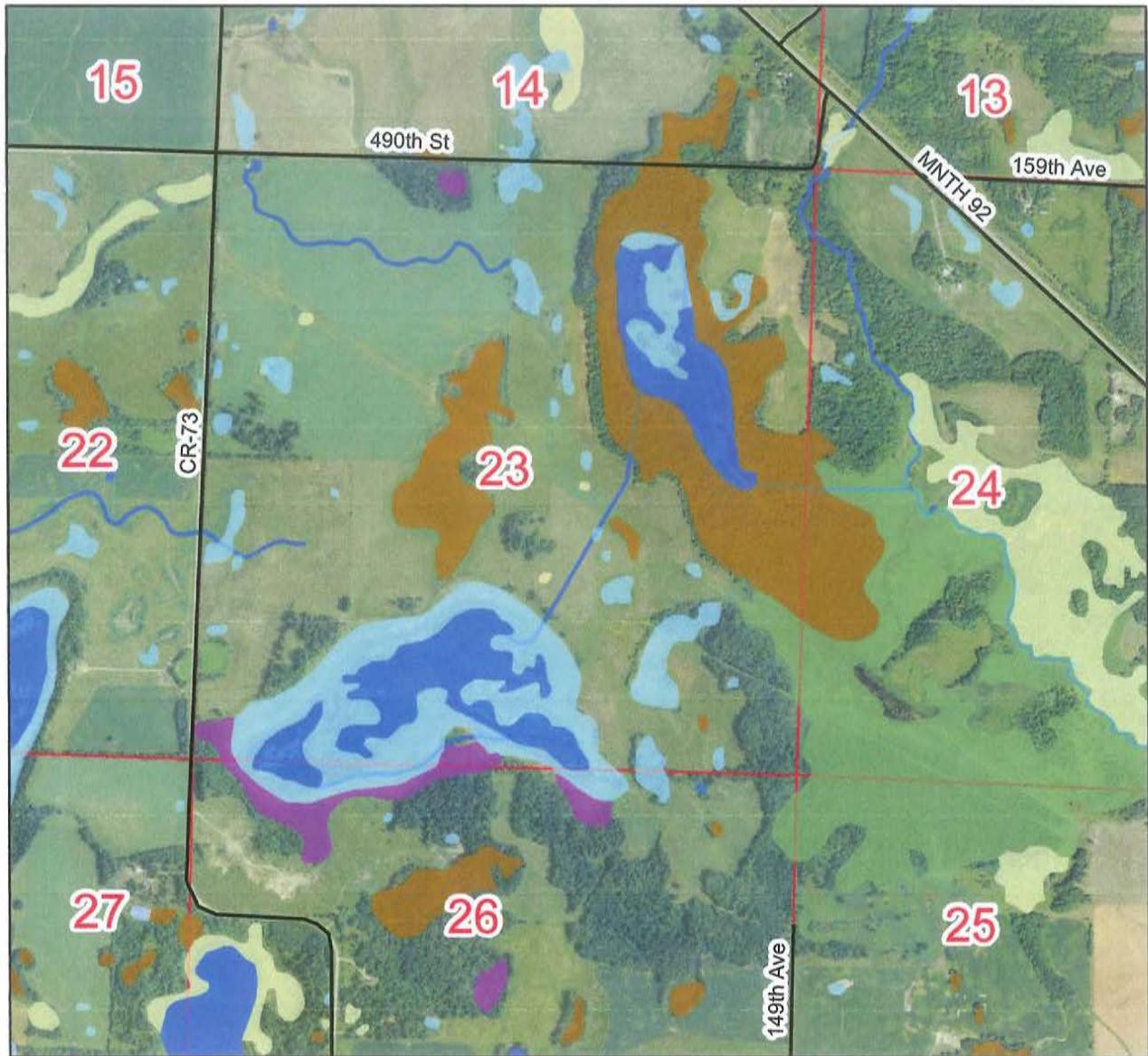


Exhibit B

Wetlands

- Surrounding Areas of Erie-Bourdeaux Family Revocable Trust Properties – MPCA
- Clearwater County GIS Map showing wetlands layer

Erie- Water Features: Surrounding Area of Bourdeaux Properties



* Springs on
Erie Lake
* Hot Spring
on Erie
Lake

Legend

— Flowline - Nat'l Hydrological Data

— Road

□ Section Line

NWI - Circular 39 Classification - Polygons

1 - Seasonally Flooded Basin or Flat

2 - Wet Meadow

3 - Shallow Marsh

4 - Deep Marsh

5 - Shallow Open Water

6 - Shrub Swamp

7 - Wooded Swamp

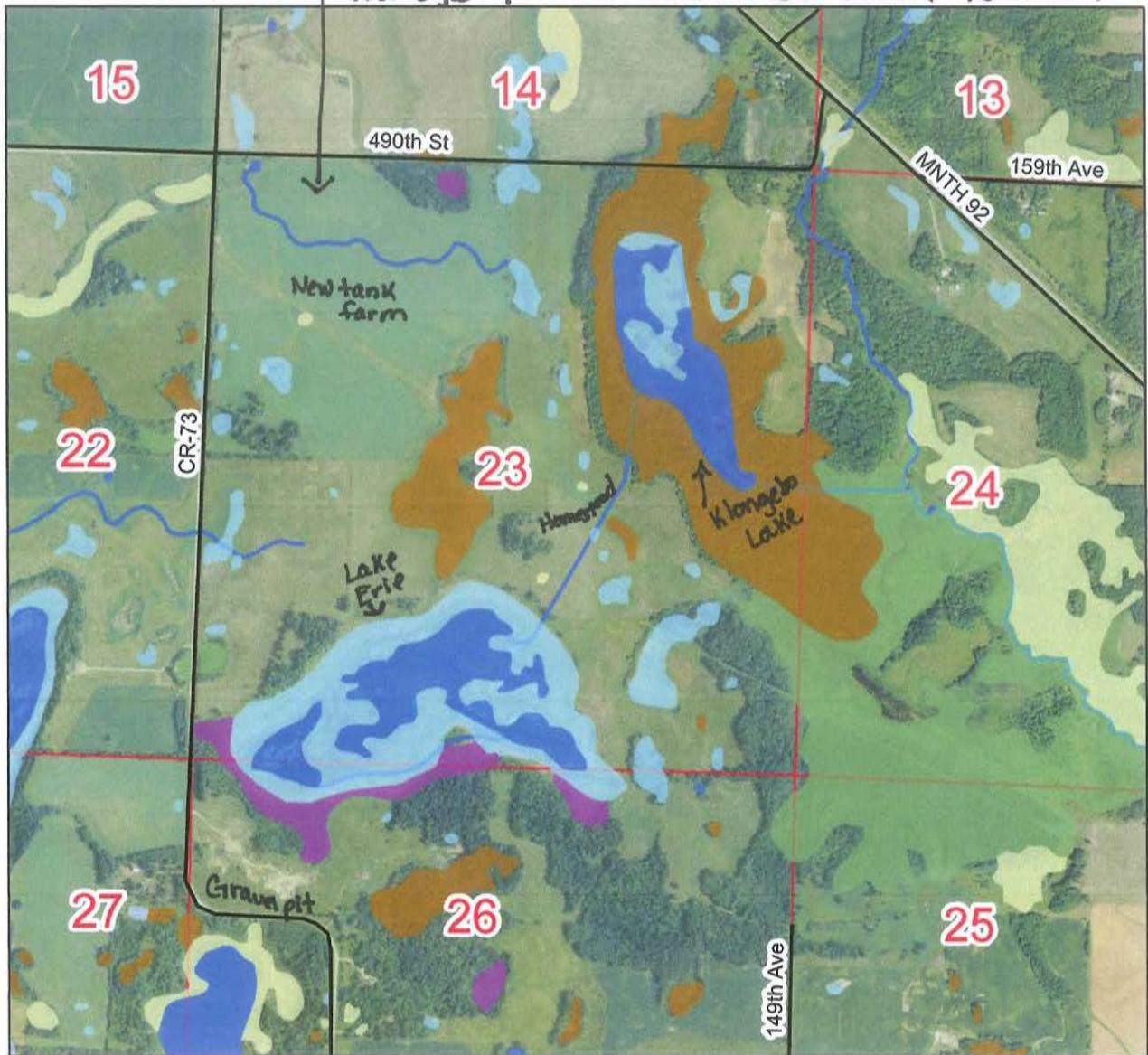
8 - Bogs



March 2, 2016

Water Features: Surrounding Area of Bourdeaux Properties

Erie-
Enbridges propose West Clearbrook Terminal



* Springs on Erie Lake

* Hot Spring on Erie Lake

Legend

— Flowline - Nat'l Hydrological Data

— Road

□ Section Line

NWI - Circular 39 Classification - Polygons

1 - Seasonally Flooded Basin or Flat

2 - Wet Meadow

3 - Shallow Marsh

4 - Deep Marsh

5 - Shallow Open Water

6 - Shrub Swamp

7 - Wooded Swamp

8 - Bogs







Exhibit C

- Minnesota Pollution Control Agency Letter – regarding West Clearbrook Terminal – new tank farm.



Minnesota Pollution Control Agency

520 Lafayette Road North | St. Paul, Minnesota 55155-4194 | 651-296-6300

800-657-3864 | 651-282-5332 TTY | www.pca.state.mn.us | Equal Opportunity Employer

August 6, 2014

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

Dear Mr. Haar:

RE: Enbridge Sandpiper Pipeline Project, Docket No PL 6668/PPL-13-474

The Minnesota Pollution Control Agency (MPCA) has reviewed the comments and recommendations submitted by the Department of Commerce (DOC) on July 16, 2014, which will be considered by the Public Utilities Commission (Commission) at the August 7, 2014, hearing for the Enbridge Sandpiper Pipeline project. The MPCA offers the following comments on the project and the DOC's July 16, 2014, recommendations.

The recent boom in the production of oil and gas in North Dakota and surrounding areas has brought about an increase in the number of planned and proposed projects in Minnesota for the transportation, storage, and processing of these resources and their related products and uses. This activity has increased citizen and Agency interest in the amount and quality of information available to adequately assess the individual and cumulative environmental impacts of these projects and to fully inform decision-making processes.

Many alternatives to the proposed Sandpiper project and route have been suggested in the routing (PPL-13-474) and certificate of need (CN-13-473) proceedings, including rail transport, trucking, and numerous pipeline routes. The Commission will determine which alternatives are to be addressed in greater detail as the environmental review, certificate of need, and permitting processes move forward.

Given the high potential of additional pipelines and replacement or upgrading of existing pipelines in the near future, and within the same corridors, it is critical that the current effort consider multiple alternatives, including both route and system alternatives. For the reasons outlined below, limiting the alternatives to route options alone at this stage would unnecessarily narrow the scope of project options to reduce environmental and public health risks.

In our comments, the MPCA has suggested both route and system alternatives; these are discussed in the DOC's July 16, 2014, filing. I am concerned that the system alternative recommended for consideration by the MPCA may not be evaluated in these proceedings, since it does not include the Clearbrook terminal. The DOC evaluated the MPCA's system alternative, SA-03, and developed a connector segment to Clearbrook that would convert SA-03 into a route alternative. The MPCA supports inclusion of the SA-03 route with the connector segment developed by DOC as a less environmentally harmful route alternative than the proposer's route.

Mr. Burl Haar, Executive Secretary
Page 2
August 6, 2014

The MPCA's view is that the environmental impacts of system alternatives need to be considered as well as route alternatives. A system alternative that will transport oil to an alternative terminal with significantly less environmental harm should be evaluated in these proceedings.

My understanding is that system alternatives are considered in the Certificate of Need (CN) proceeding for this project. I also understand that DOC conducts environmental review of system alternatives in High Voltage Transmission Line certificate of need proceedings in the form of an Environmental Report (ER), but that this review is not conducted for pipeline certificate of need proceedings. The MPCA respectfully requests that the Commission request the DOC to prepare an ER-type review of alternatives to the project, including SA-03 as originally proposed by the MPCA without the connector segment to Clearbrook, for introduction into the CN proceeding. This position is based on MPCA's understanding as follows:

1. The project purpose can be met without constructing new storage capacity in Clearbrook. If the new terminal were to be built at a more westerly location, such as Crookston, a 75-mile long pipeline to Clearbrook could be constructed for the purpose of sending the oil that Enbridge is contractually obligated to send through Clearbrook (for transport to St. Paul refineries), while the remainder of the Bakken crude could be sent via a less environmentally harmful route well to the south of the sensitive water resources, and then on to the Superior, Wisconsin terminal.
2. Locating terminal facilities near Crookston, or at another site closer to the border of North Dakota, could offer other pipeline routes as viable alternatives, such as the proposed "System Alternatives" identified in the July 16, 2014, DOC recommendations. A terminal closer to the Minnesota/North Dakota border could be the point of origination for future pipelines that would travel to the south and avoid the potential threat to sensitive water resources that the MPCA has identified as being associated with the currently proposed Sandpiper route.

Thank you for consideration of our request.

Sincerely,



John Linc Stine
Commissioner

JLS:bt

Exhibit D

- USDA – Clearwater County: Wetland Determination/Restricted Use
- Springs and Hot Spring
- Shows Transmission Line (900 Foot) through wetlands.



2016 Program Year

Map Created December 17, 2015



Unless otherwise noted: crops are non-irrigated

- Corn = yellow for grain
- Soybeans = common soybeans for grain
- Wheat = HRS for grain or HRW for grain
- Oats and Barley = Spring for grain
- Rye = for grain
- Peas = process

- Alfalfa, Mixed Forage AGM, GMA, IGS = for forage
- Beans = Dry Edible
- NAG = for GZ
- Canola = Spring for seed
- Sunflower = oil or non-oil for grain

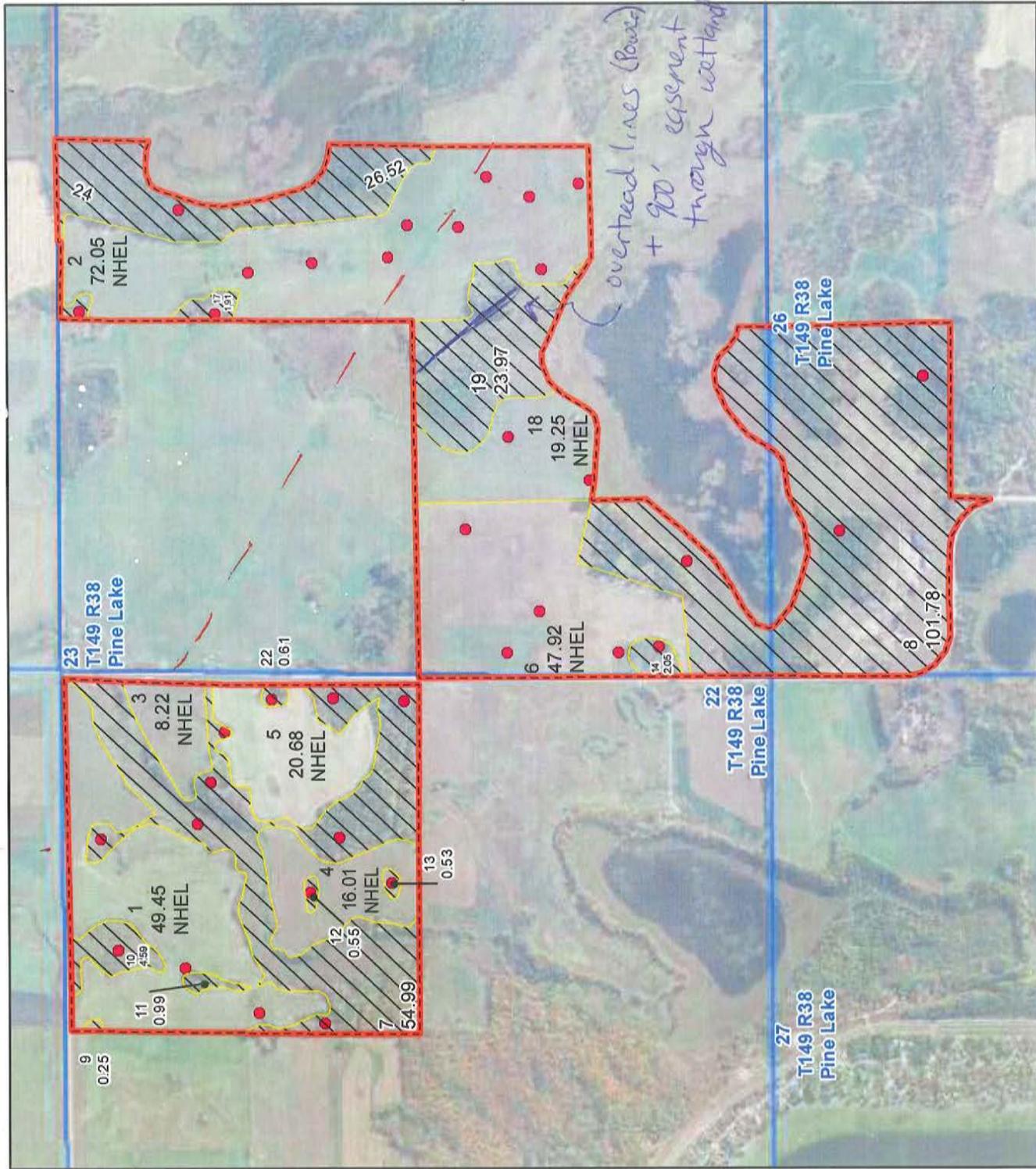
going in
Common Land Unit

- Non-Cropland
- Cropland
- Tract Boundary
- PLSS

Wetland Determination
Identifiers

- Restricted Use
- Limited Restrictions
- Exempt from Conservation
- Compliance Provisions

Tract Cropland Total: 233.58 acres



USDA FSA maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or the 2015 NAIP imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. The USDA Farm Service Agency assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact NRCS.

Cari Reepke - NRCB 218-6074 4084 441 141
Farm 2327

Haney wants to make...

Tract 13135



2016 Program Year

Map Created December 17, 2015



Unless otherwise noted: crops are non-irrigated
 Corn = yellow for grain
 Soybeans = common soybeans for grain
 Wheat = HRS for grain or HRW for grain
 Oats and Barley = Spring for grain
 Rye = for grain
 Peas = process

Alfalfa, Mixed Forage AGM, GMA, IGS = for forage
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 Canola = Spring for seed
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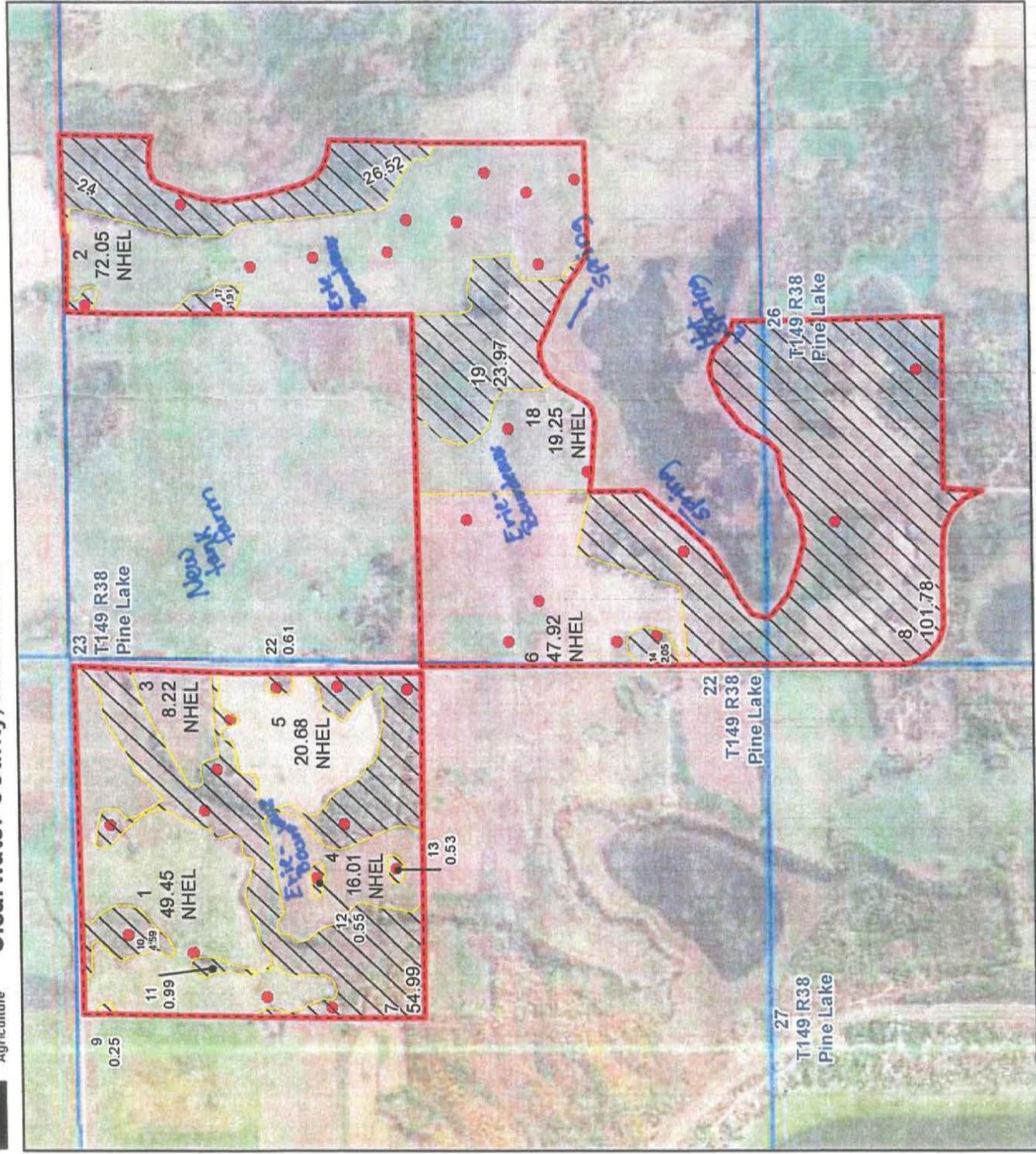
Common Land Unit

- Non-Cropland
- Cropland
- Tract Boundary
- PLSS

Wetland Determination Identifiers

- Restricted Use
- Limited Restrictions
- Exempt from Conservation
- Compliance Provisions

Tract Cropland Total: 233.58 acres



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Exhibit E

- Erie – Bourdeaux Aggregate Mine

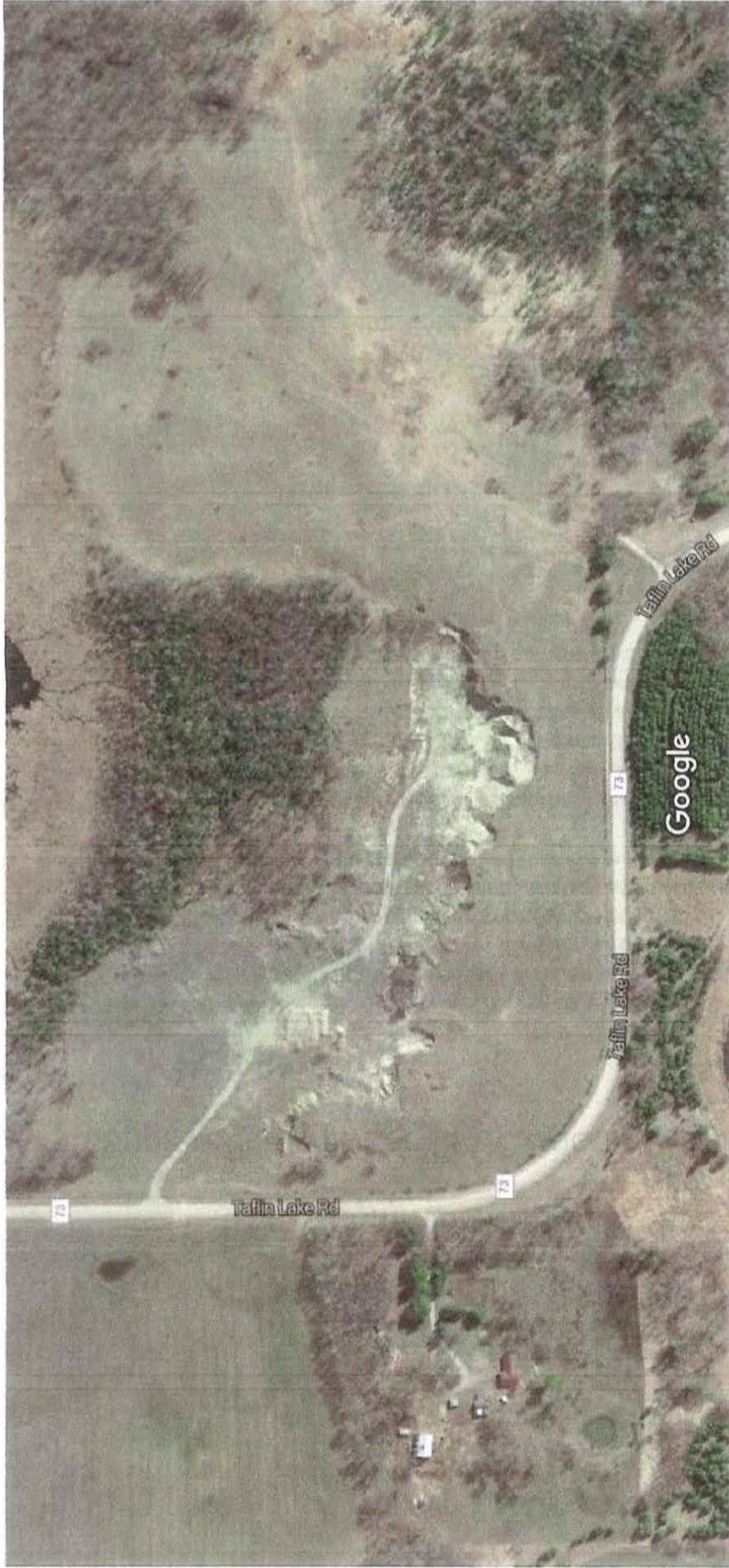


Exhibit F

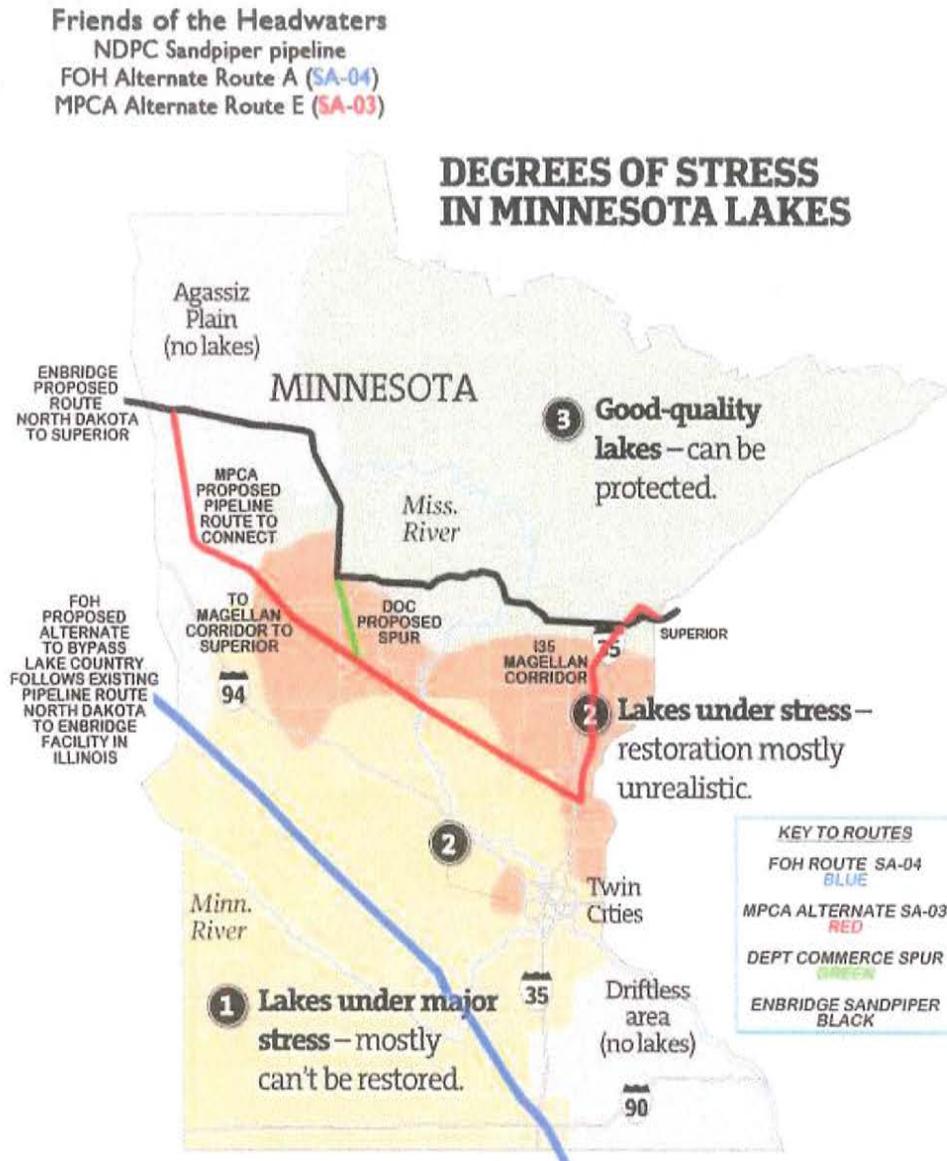
Route Alternatives

- FOH Alternate Route A (SA-04)
- MPCA Alternate Route E (SA-03)

[Click here](#) for a description of the Line 3 Project and detailed information needed to submit comments to the PUC.

Consider using information from the following to bolster your own personal comments:

1. Maybe you saw the [recent article in the STRIB](#) about how stressed MN lakes are. FOH has employed that map to make our case. Minnesota's best-quality waters would be jeopardized by these pipelines.



Source: Provided by Ron Way using information from the Minnesota Department of Natural Resources and the U.S. Environmental Protection Agency

MARK BOSWELL • Star Tribune

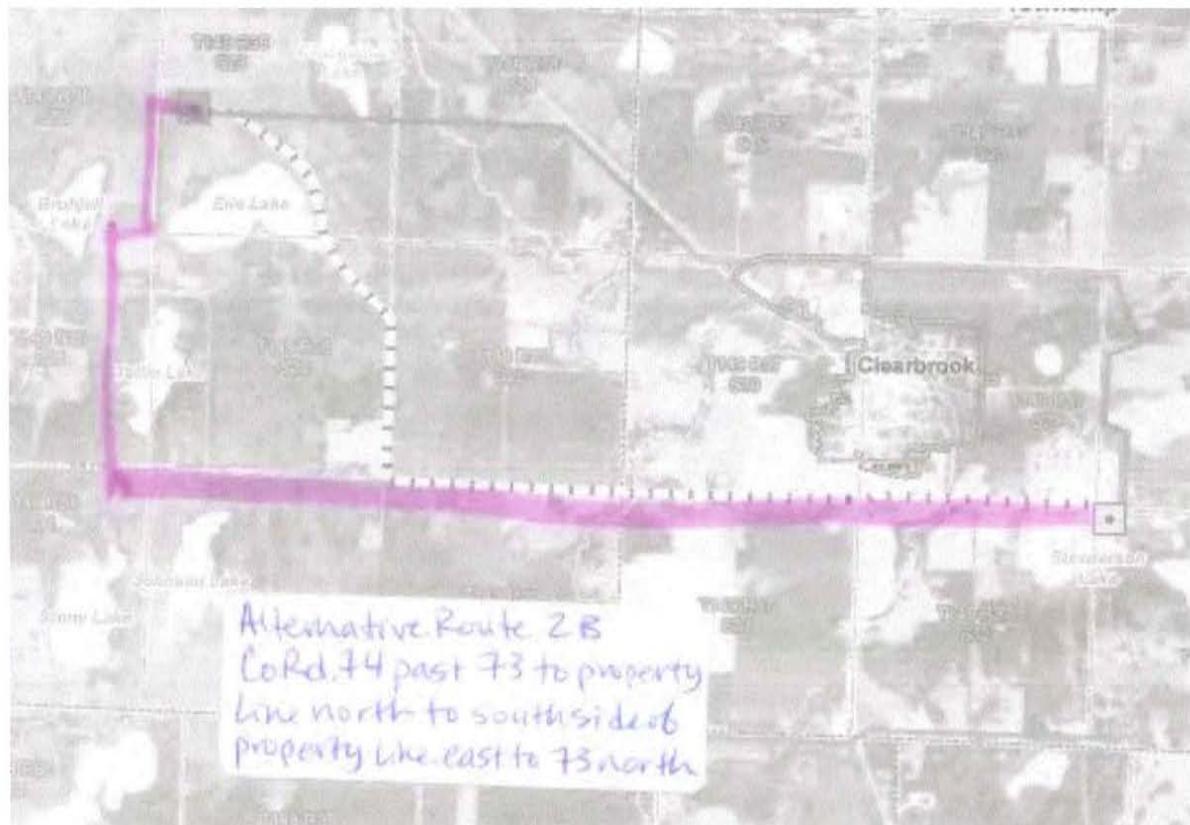
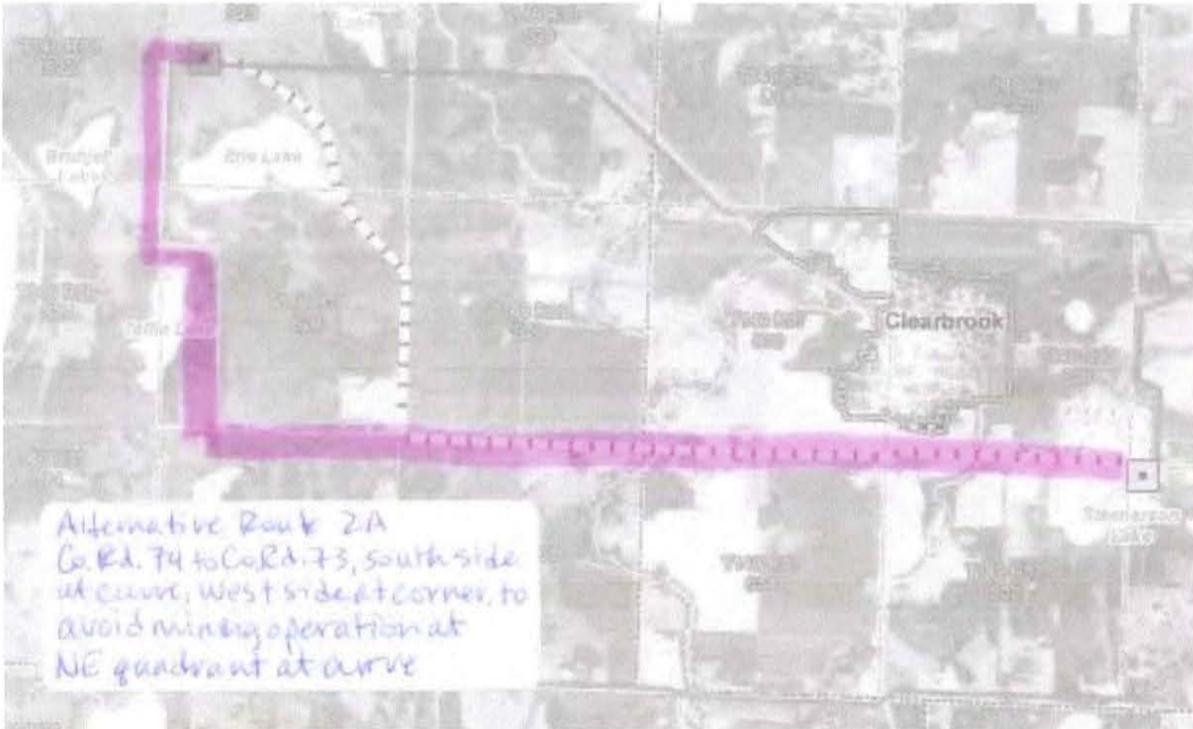
Exhibit G

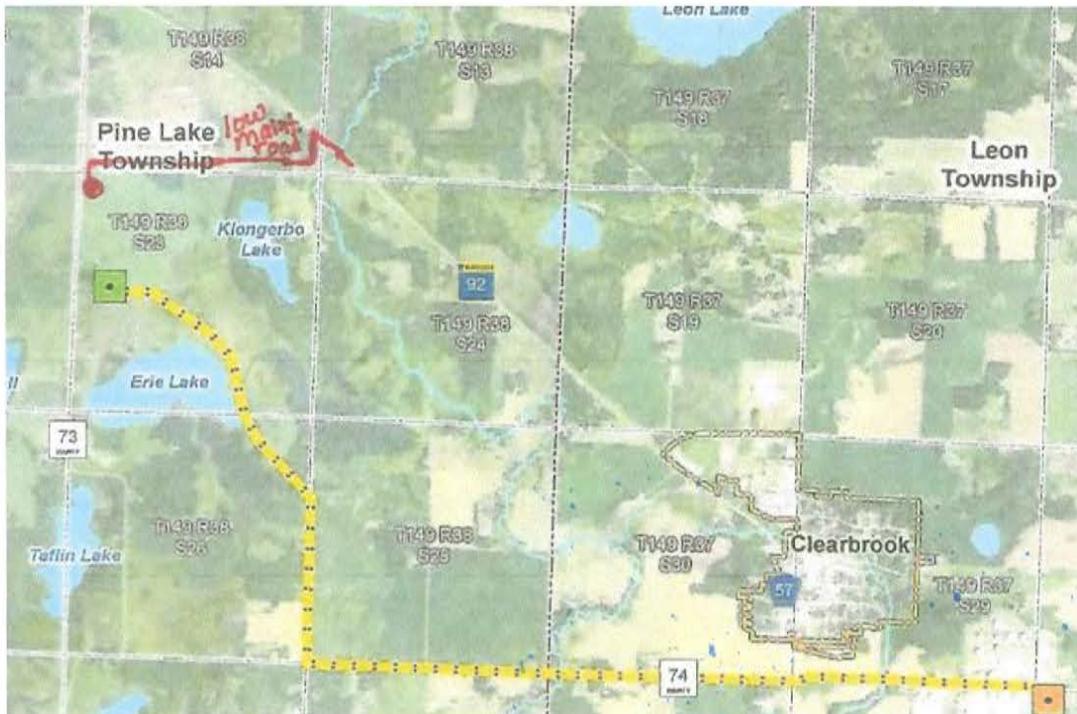
- Route Alternatives for Clearbrook West 115 kV Transmission Line

Transmission

and 4A

Alternate Routes – Alternate Routes 2A, 2B and 3A, 3B and 3C (see rationale below):





3B
Follow 92
NW to
Low Maint.
Road

3C Follow 92 NW



4A



Alternative Route 4A

Co. Rd. 74 to 159th Ave

(turn before cemetery R16.025.300)
to 92 NW to Taflin Lake Rd,
South on east side of Taflin
to Tank Farm | terminal.

Please provide your contact information. This information and your comments will be publicly available.

Name: Sharon Bring Phone: 218-874-3113
Street Address: 20897-360th St NW
City: Strandquist State: MN ZIP: 56758
Email: 2bring@wiktel.com

My comments pertain to:

- Sandpiper Pipeline Project
- Line 3 Replacement Project
- Both Projects

I'm a County Commissioner for Marshall County.

I see these projects are extremely important to our economy as it provides jobs to people who may choose to live elsewhere without it.

It is important to our tax base for our small communities as our school district, townships and small cities benefit tremendously and help rural Minnesota stay alive. We can offer better schools which brings students in from other areas and more young people want to move into our school district. It provides workers with local food from cafes and patronize our gas stations. Another concern for our citizens is the roads as we have a harder time getting funding to maintain. It is important to keep the oil in the pipelines as our rail and road infrastructure are overloaded now. Our farming communities have many more permits trailers on our roads which is also important for the farmers but thereby requires more road maintenance.

It is also important to keep the oil industry as important to keep in our rural areas and not depend on fossil fuel.

We are a largely agricultural area and farmers provide the food for the majority of our wildlife. Whether it is stocked hay bales that the wildlife eat or a feast out in our fields the wildlife are fed well which provides another source of income for those benefiting from hunters, birdwatchers etc.

Mr. J. MacAlister, Environ. Rev. Mgr.
Min. Dept. of Commerce
St. Paul, MN.

Tuesday 4-12-16
369 A.E. Selvidere St.
St. Paul, MN. 55107

RECEIVED

APR 14 2016

MAILROOM

Ref: Sandpiper: PL-6668/CN-13-473
PPL-13-474
Line 3: PL-9/CN-14-916
PPL-15-137

Dear Review Mgr. Mr. MacAlister,

Environmental Hazard (See enclosed Article of
4-12-16 By Blake Nicholson, Star-Tribune "Keystone Oil
is flowing again after leak, spill") of the
Sandpiper Pipe line Project should not be permitted
to repeat the event described.

The expansion of fossil fuel delivery only encourages
the further use of carbon based pollutants that have
our planet in crisis predicament.

The Sandpiper Pipeline Project should be rejected
in its' entirety.

"Thank You" for your consideration in this matter.

Sincerely,
Robert A. Brode

NATION & WORLD

WEDNESDAY, APRIL 12, 2016

Keystone oil is flowing again after leak, spill

By BLAKE NICHOLSON
Associated Press

BISMARCK, N.D. — TransCanada Corp. has resumed sending oil through the Keystone Pipeline after a weeklong shutdown prompted by a leak and oil spill in southeastern South Dakota.

The pipeline came back online Sunday, but with a reduced pressure under a controlled restart whose terms were ordered by the federal Pipeline and Hazardous Materials Safety Administration. TransCanada also will be reviewing construction records, doing additional inspections of the pipeline and additional ground and air monitoring, spokesman Mark Cooper said Monday.

TransCanada estimated about 400 barrels of oil, or just under 17,000 gallons, spilled onto private land during the leak, the duration of which the company said is unknown. Federal regulators sent the company an order Saturday that said an "anomaly" on a weld on the pipeline was to blame for the leak, but the cause wasn't immediately determined. When a third-party metallurgist hired by TransCanada discovered the leak, it was releasing oil at a rate of about two drops per minute.

State Department of Natural Resources environmental scientist Brian Walsh said oil contaminated only the nearby soil and not any waterways or aquifers. Tainted soil was removed and work will continue to restore the site, Cooper said. The two directly affected landowners will be compensated for their time and any damages, he said.

"We recognize this is a significant inconvenience to their day-to-day lives," Cooper said.

The leak was discovered April 2 on the pipeline that transports crude from Alberta to refineries in Illinois and Oklahoma, passing through the eastern Dakotas, Nebraska, Kansas and Missouri. It can handle 550,000 barrels, or about 23 million gallons, daily.

From: [Terry Brumfield](#)
To: [*COMM Pipeline Comments](#)
Subject: Scoping EIS comment for Sandpiper (13-473 & 13-474) and Line 3 Replacement (14-916 & 15-137)
Date: Monday, May 09, 2016 5:20:07 PM

Dear Ms. MacAlister,

The U.S. people need to be independent of foreign oil and gas. If we develop oil and gas in this country, that means jobs, that means tax dollars for this country. We need to take care of this country FIRST!!
With the help of the gas and oil companies using UNION LABOR to build these projects, we can insure a project DONE RIGHT!!!

Sincerely,

Terry Brumfield
1516 Katie Ln
Enid, OK 73701
terrybrumfield61@yahoo.com

Craig Bunness

April 16, 2016

Dear Governor Dayton:

We are County Commissioners from counties along the Enbridge Mainline system and the Sandpiper Pipeline and Line 3 Replacement Project routes in northern Minnesota. We requested a meeting with you several weeks ago in the hope of sharing our support for these projects and how important they are to our constituents; the Minnesotans who have lived and worked alongside Enbridge's existing pipelines for 65 plus years. We understand that your schedule didn't align with our request and would like to thank your Chief of Staff for meeting with a few of us.

First, we would like to thank you for your continued support. We appreciate that you understand how important these projects are to our economy and the safety of all Minnesotans located along the oil train routes that cross our state. Every day of further delay is another day that more oil is unnecessarily crossing our state on trains instead of in pipelines where it belongs.

Millions of dollars in local property tax revenue and thousands of jobs are at stake. Our area businesses benefit greatly when projects like these are constructed. Sometimes these projects are the difference between businesses closing or staying open for the area. Delays by agencies can kill projects like these. Local support for these projects is strong in our counties and we want to make sure you are aware of that.

We ask you and your agencies to work as expediently as possible in supporting the PUC so they can review and permit these projects in a timely manner. The jobs and tax and economic benefits from Sandpiper are past due and Line 3 has already lost months in the process.

We invite you, your staff or the Lieutenant Governor to visit with us and our constituents in our home counties anytime so we can further talk about how these projects would benefit our area and the state. Thank you for your time Governor Dayton.

Sincerely,

Joan Lee
Craig Bunness
Nick Nicholas
Don Diedrich
Warren Strandell
Polk County Commissioners

Ken Borowicz
Sharon Bring
Gary Kiesow
Rolland Miller
LeRoy Vonasek
Marshall County Commissioners

Neal Illies
John Nelson
Dean Newland
Daniel Stenseng
Arlen Syverson
Clearwater County Commissioner

Cody Hempel
Don Jensen
Neil Peterson
Oliver "Skip" Swanson
Darryl Trveitbakk
Pennington County Commissioner

John Anderson
Joe Bouvette
Leon Olson
Craig Spilde
Betty Younggren
Kittson County Commissioner

Anthony "Chuck" Flage
John Lerohl
Charles Simpson
Dave Sorenson
Ron Weiss
Red Lake County Commissioners



Aug. 4, 2014

Minnesota PUC

The Polk County Board of Commissioners is on record — in a unanimous action — in support of the proposed route of the Sandpiper Pipeline. We believe that the route developed by Enbridge, in conjunction with local governments, not only makes sense but meets all rules and regulations regarding safety and the protection of the environment.

Any delay in the construction process must be avoided.

The Sandpiper is the best method for the delivery of oil to refining facilities at Superior, Wis., and to the East. The proposed route crosses the entire width of Polk County. The message that we are hearing from constituents is that there is strong support for the project. The only concern that we hear — one that we as commissioners share — is that all existing rules regarding safety and the protection of the environment are followed.

Polk County could benefit greatly from the Sandpiper. Enbridge is already the top property taxpayer in the county at close to \$2 million a year. This is about 10 percent of our total county tax levy. The Sandpiper would add to that total. Like all local government units, Polk County could make good use of additional revenue to provide better services without a tax consequence for property owners. It is estimated that local units of government in Minnesota would see an additional \$25 million in property taxes from the Sandpiper.

Should the oil that is scheduled to be delivered to the Superior, Wis., terminal be shipped by truck instead, we could see 1,300 trucks a day going down U.S. Highway 2... right through Polk County and right through many of the lands that opponents want avoided. That could occur sooner rather than later if there is a route change that would further delay construction of the pipeline. Beyond the serious safety issue that this would present is the fact that the heavy traffic would raise havoc with road systems all the way across the state.

The use of railroads to transport oil is not a good option. Beyond the safety issues that have occurred recently is the fact that the extensive use of rail for the movement of oil has created a very serious problem for agriculture in that it has become extremely difficult to arrange trains to move grain to market. Because of this, huge amounts of last year's crop still remain in storage on the farm or at country elevators. Virtually all existing storage is full. There is no room for this year's crop. This already a critical situation that is only going to get worse until a new pipeline is in place for the moving oil to refineries.

OPINION > COLUMNISTS

Jim Stratton: A 'silent wall of disdain' at Minnesota regulatory agencies?

By JIM STRATTON |

February 18, 2016 | UPDATED: 18 hours ago

Recent reports disclosing the discovery of pejorative emails by a Minnesota Pollution Control Agency regulator pertaining to the Sandpiper oil pipeline are deeply concerning and raise serious questions about the fairness, objectivity and ultimate credibility of state agencies on regulatory matters.

The Sandpiper project is a key component of the economies of numerous counties, cities, townships and school districts along its route. It has strong support in Greater Minnesota, not only because of the jobs, sturdy tax base and other economic benefits it delivers, but for the ecological benefits it provides as a safe, environmentally sound alternative to hauling Bakken light crude by rail through our towns, or over our already congested and aging highway system.

We have wondered with frustration at the delays in approving this project and the benefits it would provide to local communities across the state. If these delays are in any way attributable to the personal beliefs of staff within the department — who are actively working in opposition rather than in strict adherence to applicable rule and law — those individuals need to be identified and weeded out of the process.

Our regulatory process relies on the confidence that it is administered by state-agency staff who are impartial and not motivated to put personal political philosophies ahead of a strict adherence to the laws of the state.

The revelation that a state regulator would be working in active opposition to a permit application is a startling development that raises a disconcerting but critical question about how deep this problem runs within the agencies of the state.

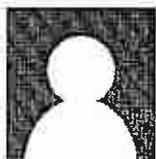
I hope Gov. Dayton and legislative leadership can appreciate the gravity of the concern that exists over this discovery. It tempers a notion that is widely held among public- and privately held organizations alike, which understand — but are afraid to say — that a silent wall of disdain exists deep within the regulatory agencies for projects that would deliver positive economic benefits to Greater Minnesota.

There is a clear and growing perception that you cannot build in this state anymore, because it is becoming exhaustive and far too costly to run the precarious obstacles of the bureaucratic minefield if your project is out of favor with the political beliefs of agency regulators.

This is a circumstance that did not always exist and raises real questions about the type of employee the agencies have been hiring over the last 10 to 15 years. Any investigation should take a long look at correcting an imbalance in hiring practices that do not recognize the value of a candidate who understands economic development and environmental protection are not mutually exclusive.

The Minnesota Rural Counties Caucus supports the request for a full and independent investigation into this incident by the Office of the Legislative Auditor, and encourages any investigation into whether other employees are working in advocacy roles against good projects, rather than abiding by standards established under the law.

Jim Stratton of Alexandria is chair of the Minnesota Rural Counties Caucus and a Douglas County Commissioner.



Jim Stratton



Board of Commissioners

Polk County Government Center
612 N Broadway – Room 211
Crookston, MN 56716-1452
Phone: (218) 281-5408
Fax: (218) 281-3808
www.co.polk.mn.us

COMMISSIONERS
CRAIG BUNESS, Crookston
WARREN STRANDELL, East Grand Forks
NICK NICHOLAS, Crookston
WARREN AFFELDT, Fosston
DON DIEDRICH, Warren

COUNTY ADMINISTRATOR
CHARLES S. WHITING

June 24, 2014

Letter to the Editor:

It is very concerning that the public comment period for the Sandpiper Pipeline project through Minnesota has been reopened and extended beyond the end of the original period. Any delay in the approval process must be avoided. This project needs to be decided on its merits and by compliance with all existing rules and regulations; not extended and/or delayed because of the highly organized efforts of a few opponents who keep repeating their views at every possible hearing and opportunity.

The Sandpiper is the best method for the delivery of oil to refining facilities at Superior, Wis., and to the East. The proposed route of this pipeline crosses the entire width of Polk County. The message that we are hearing from residents is that there is strong support for the project. The only concern that we hear — one that we as commissioners share — is that all existing rules regarding safety and the protection of the environment are followed.

The nation needs the Sandpiper, along with the Line 67 upgrade and the Keystone, as a way to provide jobs, to bolster the economy and to eliminate all importation of oil from countries that would do us harm.

Polk County needs the Sandpiper, too. Enbridge is the top property taxpayer in the county at close to \$2 million a year. This is about 10 percent of our total county tax levy. With the construction of the Sandpiper, tax revenues for local governments — and this is by Enbridge Company estimate — could increase by \$4 million in the first year alone. This revenue would go a long way toward providing better services without a tax consequence for our property owners.

While opponents are citing situations — most of which are no more possible than lightning strikes — that could cause environmental damage, we believe the frequency of these possibilities is highly unlikely and that pipelines are the safest and most efficient method for moving the needed oil product.

Should the oil that is scheduled to be delivered to the Superior, Wis., terminal be shipped by truck alone — with the Bakken now producing a million barrels a day — we could see 1,300 trucks a day going down U.S. Highway 2... right through Polk County and right through many of the lands that opponents want avoided.

Beyond the serious safety issue that this would present is the fact that the heavy traffic would raise havoc with road systems all the way across the state.

The use of railroads to transport oil is not a good option either. Beyond the safety issues that have occurred recently is the fact that the extensive use of rail for the movement of oil has created a very serious problem for agriculture in that it has become extremely difficult to arrange trains to move grain to market. Because of this, huge amounts of last year's crop still remain in storage on the farm or at our country elevators. Virtually all existing storage is full. There is no room for this year's crop. And this already critical situation is only going to get worse until another method of moving oil to refineries is in place.

The safety record and efficiency of pipelines makes it the best alternative. The State of Minnesota needs to keep the approval process on schedule to make it happen within all existing rules and regulations; not allow the procedure to be extended beyond the normal process or otherwise be delayed.

Sincerely,

Craig Bunes
Polk County commissioner, Dist. 1

Warren Strandell,
Polk County commissioner, Dist. 2

Nick Nicholas
Polk County commissioner, Dist. 3

Warren Affeldt
Polk County commissioner, Dist. 4

Don Diedrich
Polk County commissioner, Dist. 5