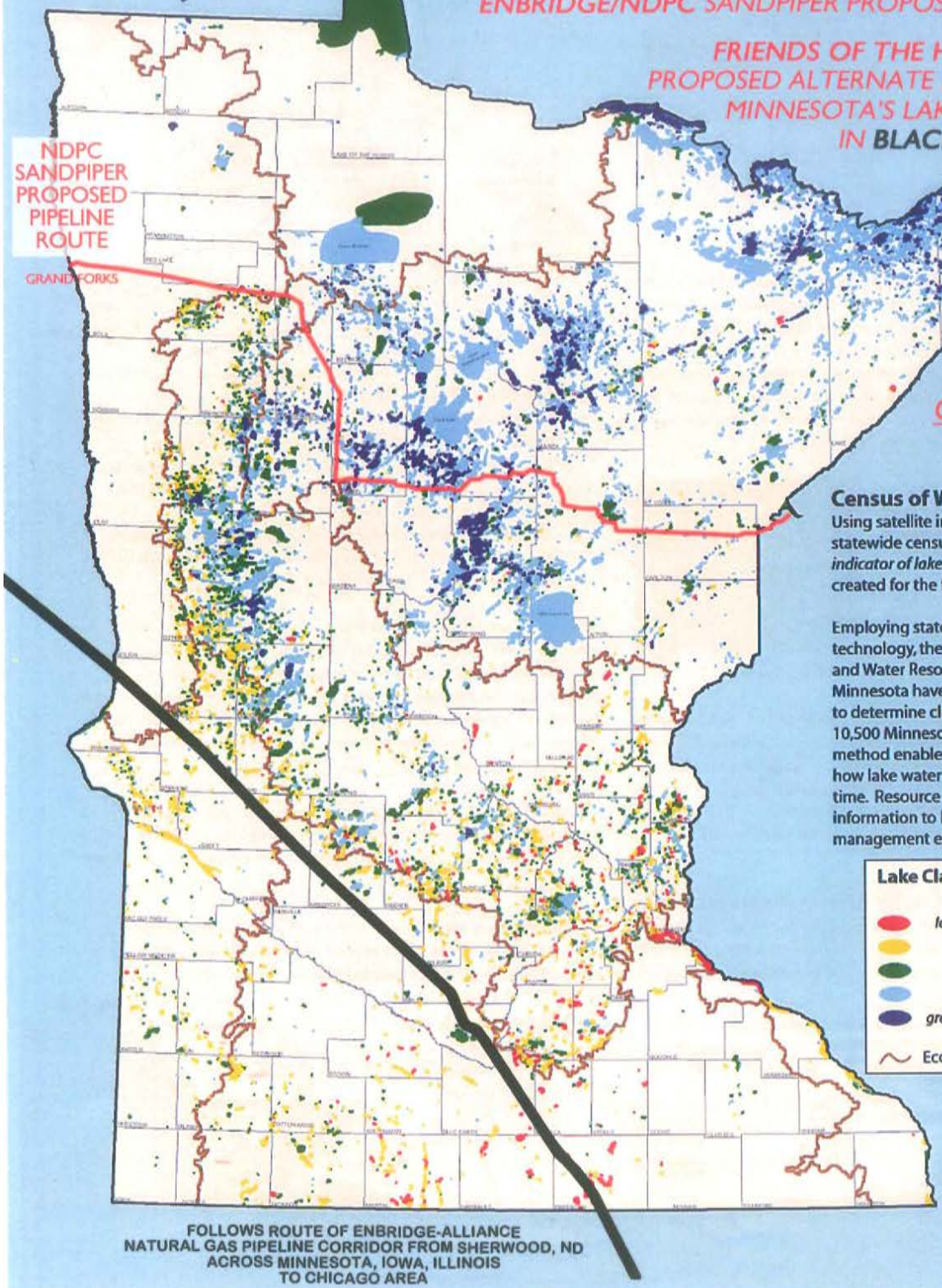
Minnesota Lakes

ENBRIDGE/NDPC SANDPIPER PROPOSED PIPELINE IN **RED**

FRIENDS OF THE HEADWATERS
PROPOSED ALTERNATE ROUTE TO AVOID
MINNESOTA'S LAKE COUNTRY
IN **BLACK**



LOOK WHERE THE CLEAREST LAKES ARE

Census of Water Clarity

Using satellite images taken from space, a statewide census of water clarity – *a key indicator of lake water quality* – has been created for the first time.

Employing state of the art image analysis technology, the Remote Sensing Laboratory and Water Resources Center at the University of Minnesota have used satellite remote sensing to determine clarity transparency for about 10,500 Minnesota lakes. This satellite-based method enables resource managers to analyze how lake water clarity varies statewide over time. Resource managers are using this information to better target monitoring and management efforts.

Lake Clarity Depth

Feet	Meters
less than 1.5	*less than 0.5*
1.5 - 3	*0.5 - 1*
3 - 6	*1 - 2*
6 - 12	*2 - 4*
greater than 12	*greater than 4*

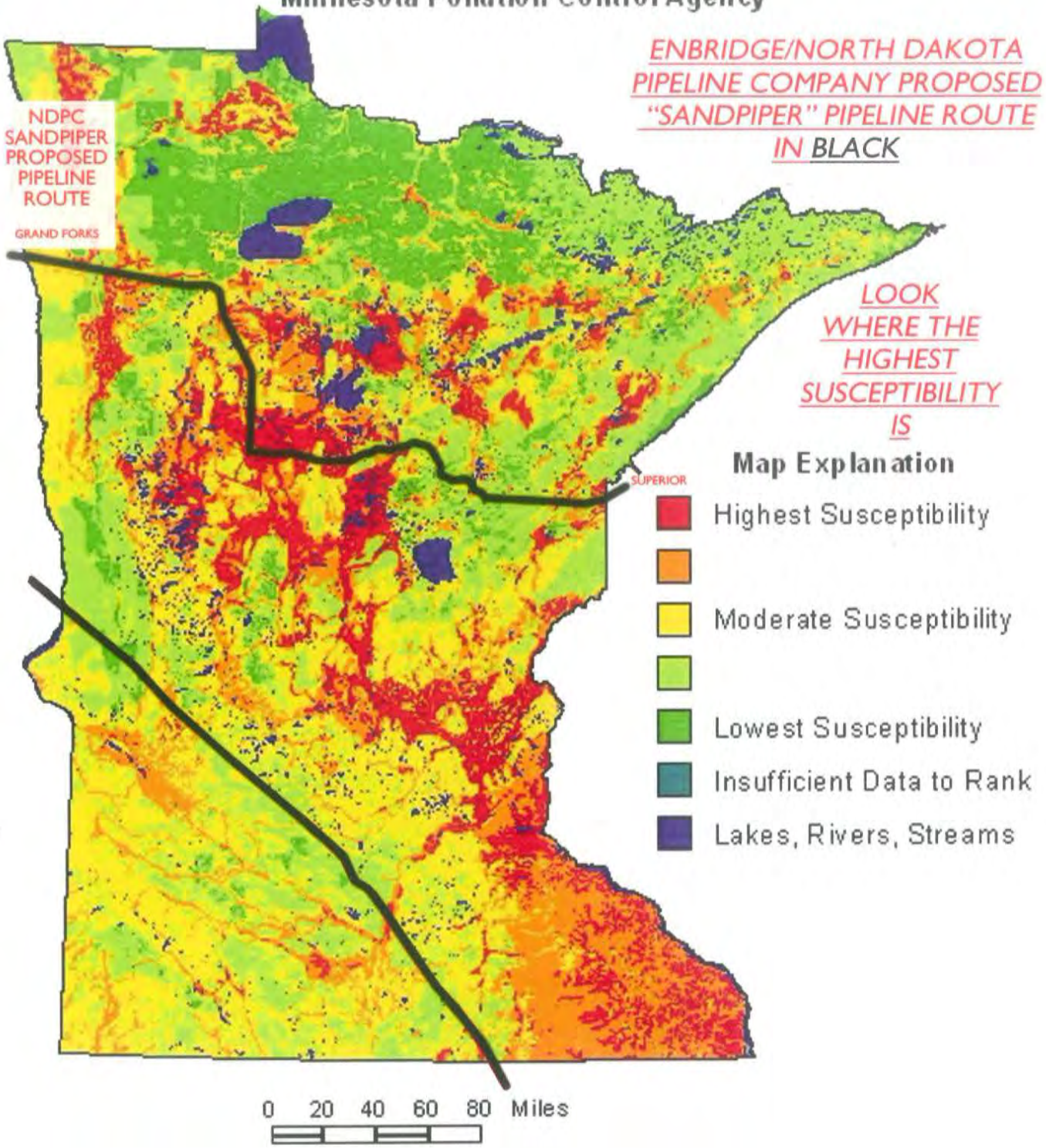
Ecoregion Boundaries

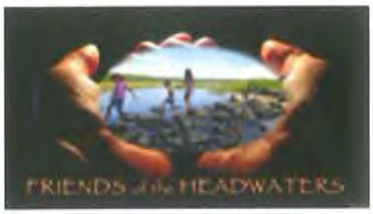
FOLLOWS ROUTE OF ENBRIDGE-ALLIANCE
NATURAL GAS PIPELINE CORRIDOR FROM SHERWOOD, ND
ACROSS MINNESOTA, IOWA, ILLINOIS
TO CHICAGO AREA

REMOTE SENSING LABORATORY
WATER RESOURCES CENTER

Ground Water Contamination Susceptibility in Minnesota

Minnesota Pollution Control Agency

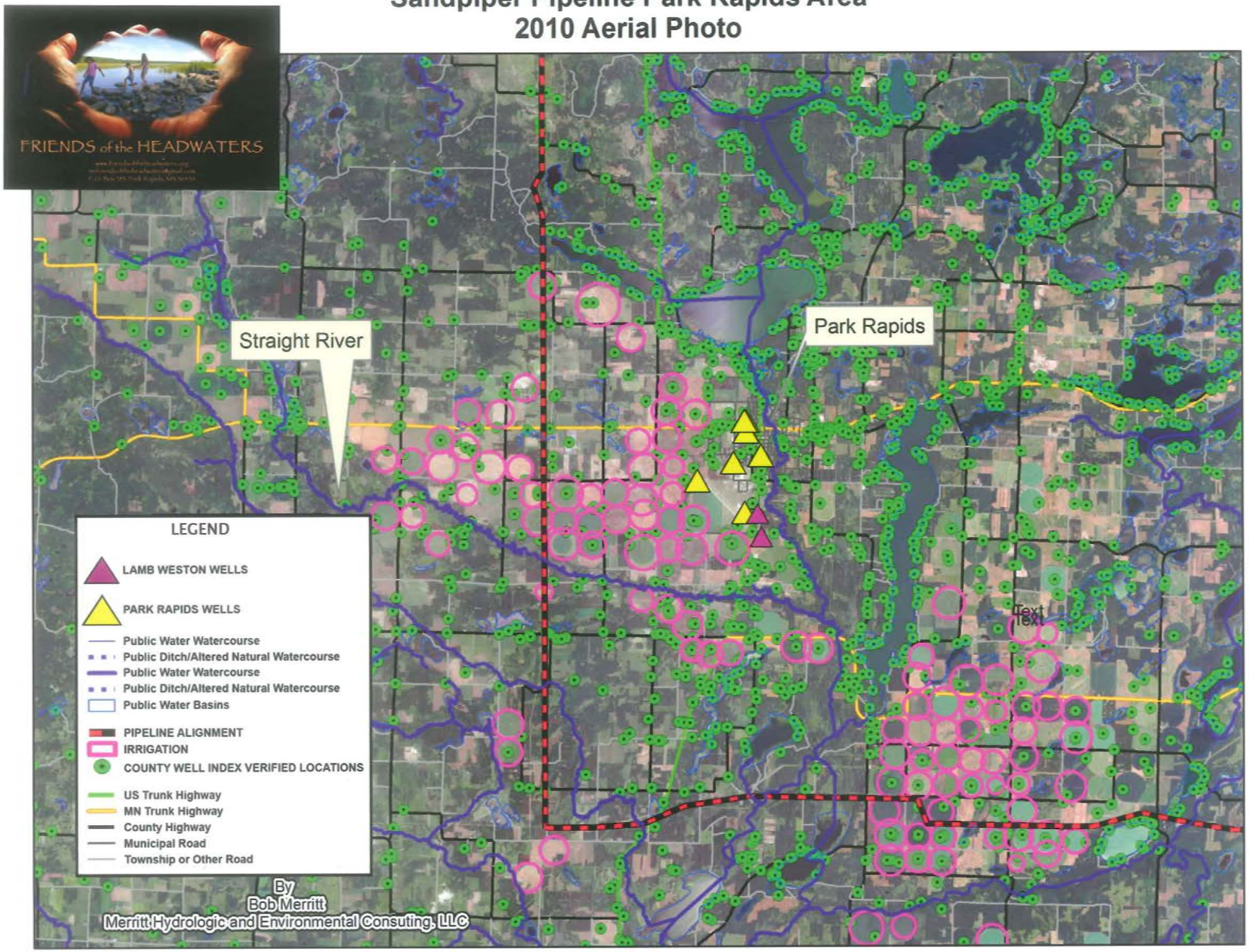




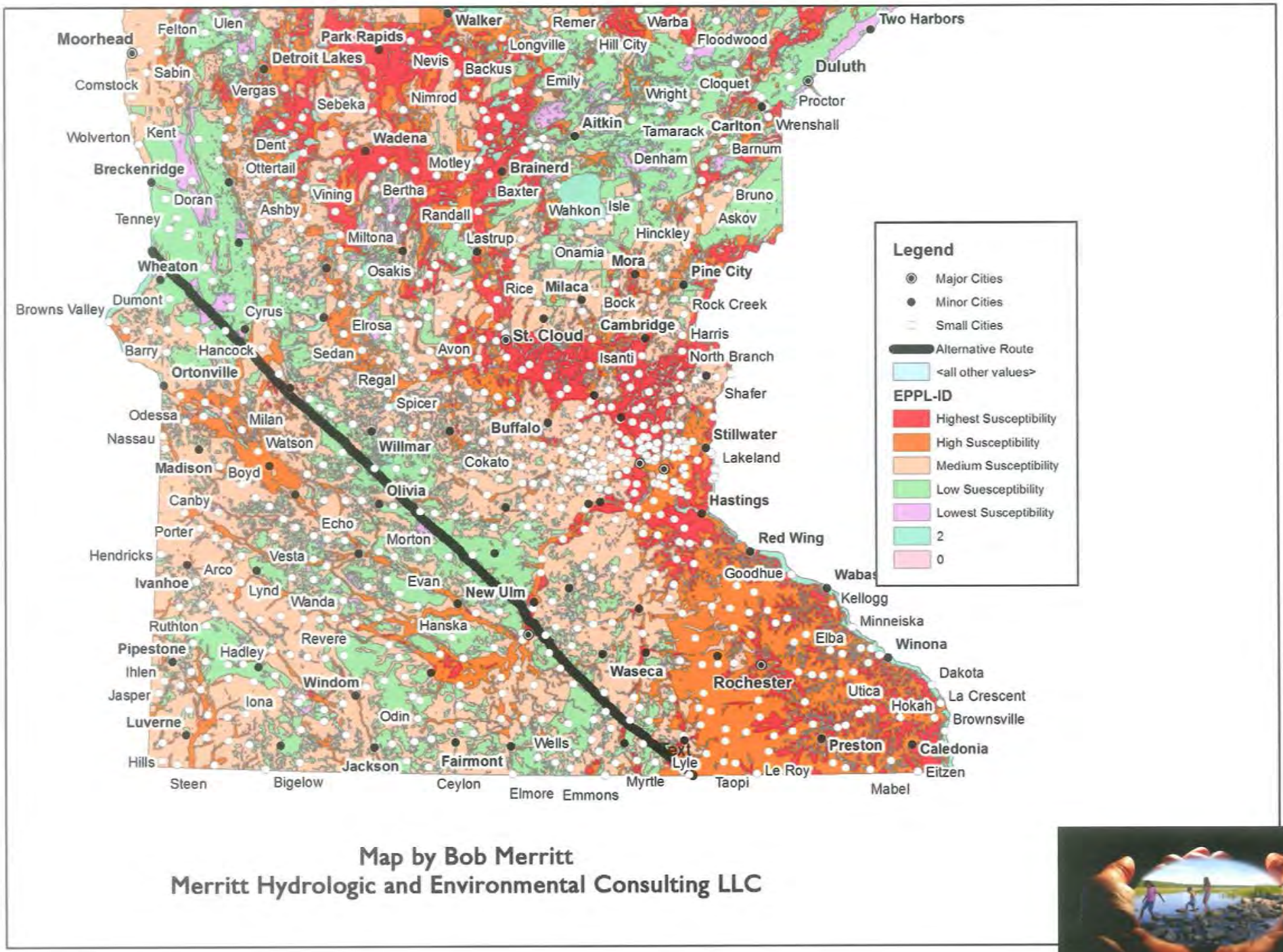
Prepared by Friends of the Headwaters
www.friendsoftheheadwaters.org

MN map from MPCA

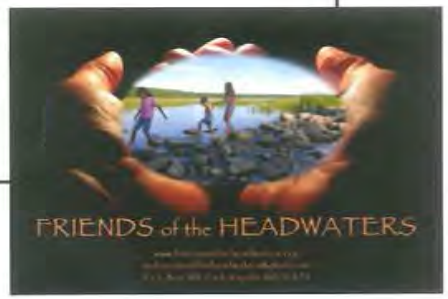
Sandpiper Pipeline Park Rapids Area
2010 Aerial Photo

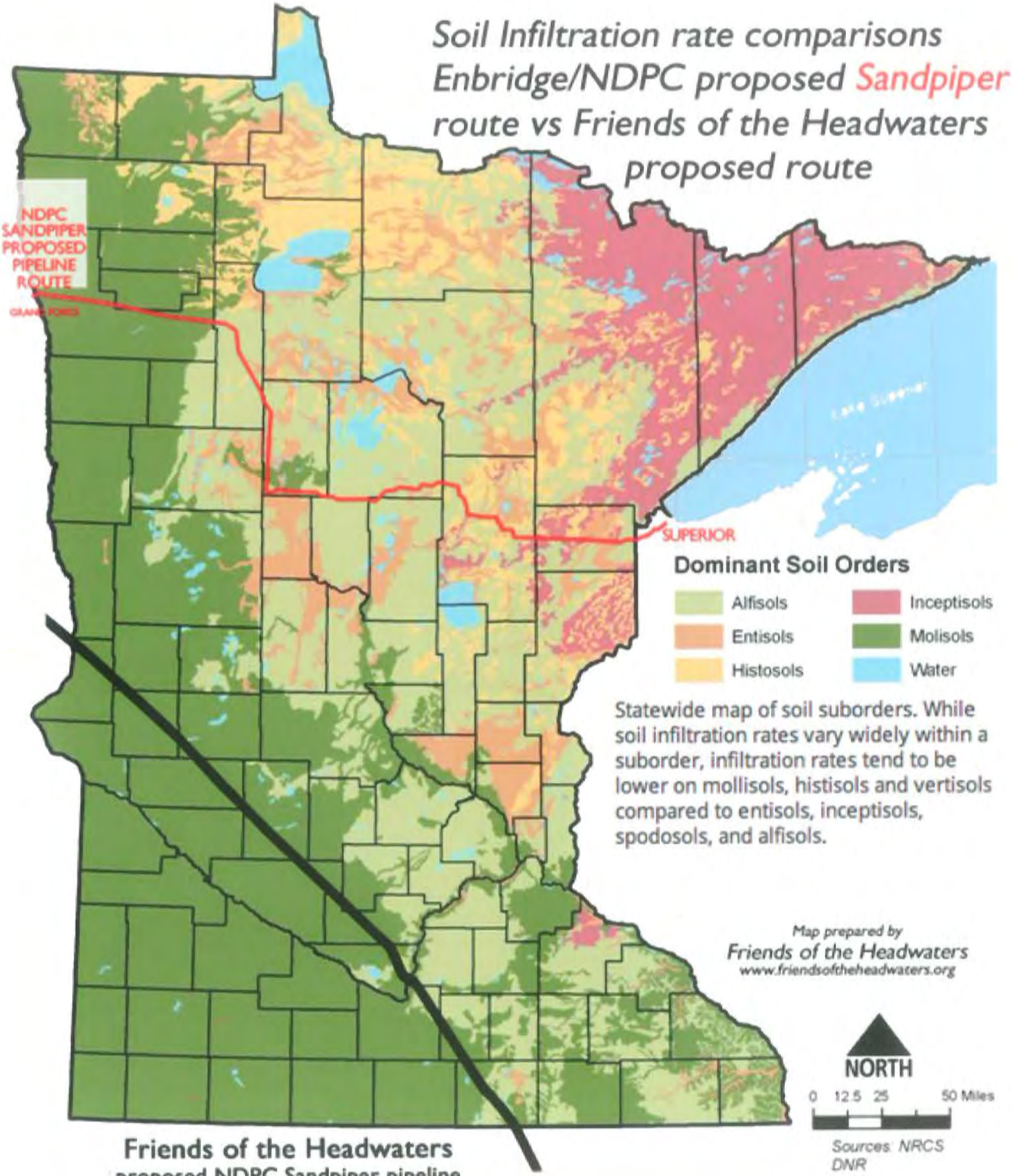


Sandpiper Alternate A With Groundwater Sensitivity



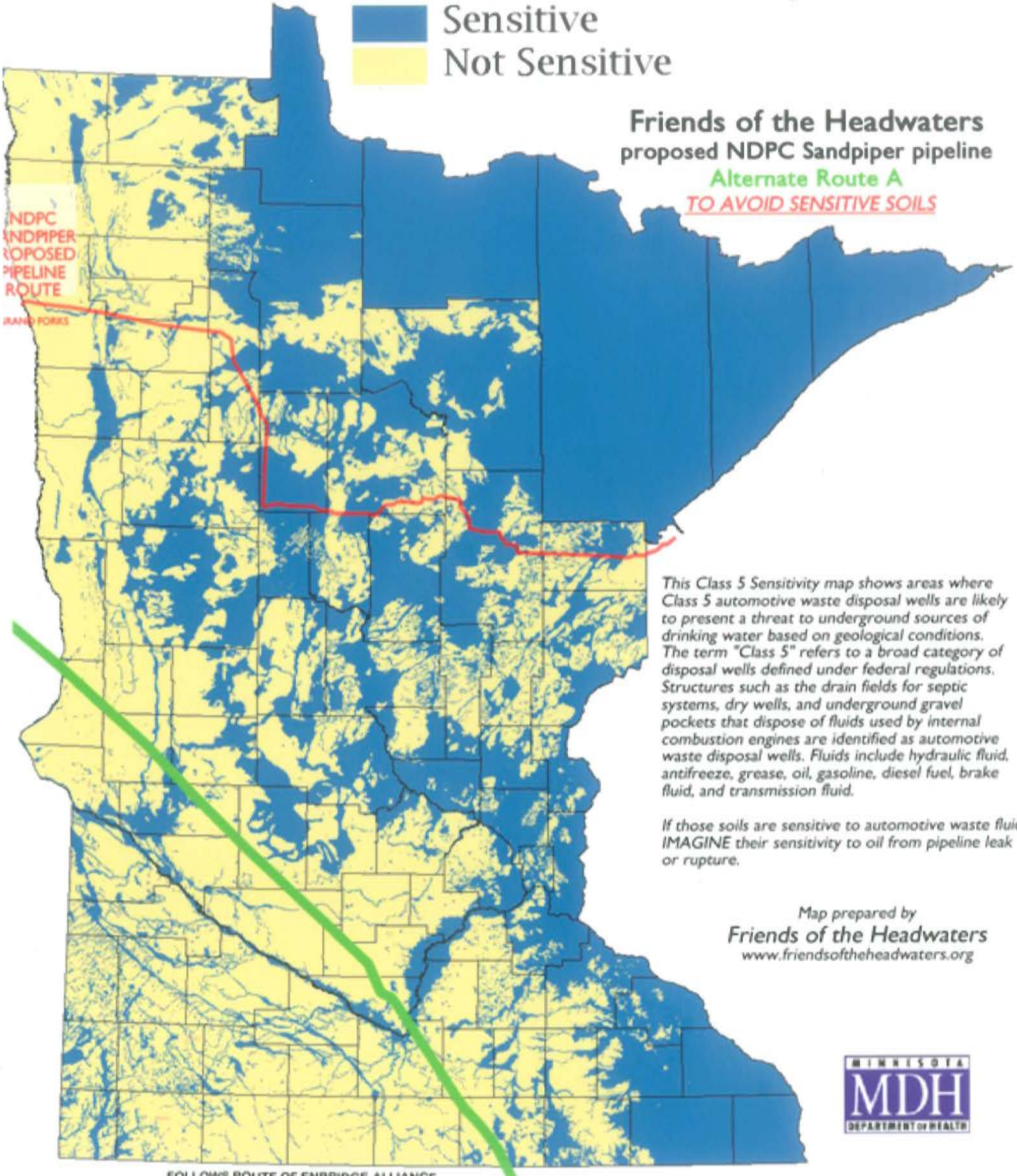
Map by Bob Merritt
Merritt Hydrologic and Environmental Consulting LLC





Friends of the Headwaters
proposed NDPC Sandpiper pipeline
Alternate Route A

Class V Sensitivity

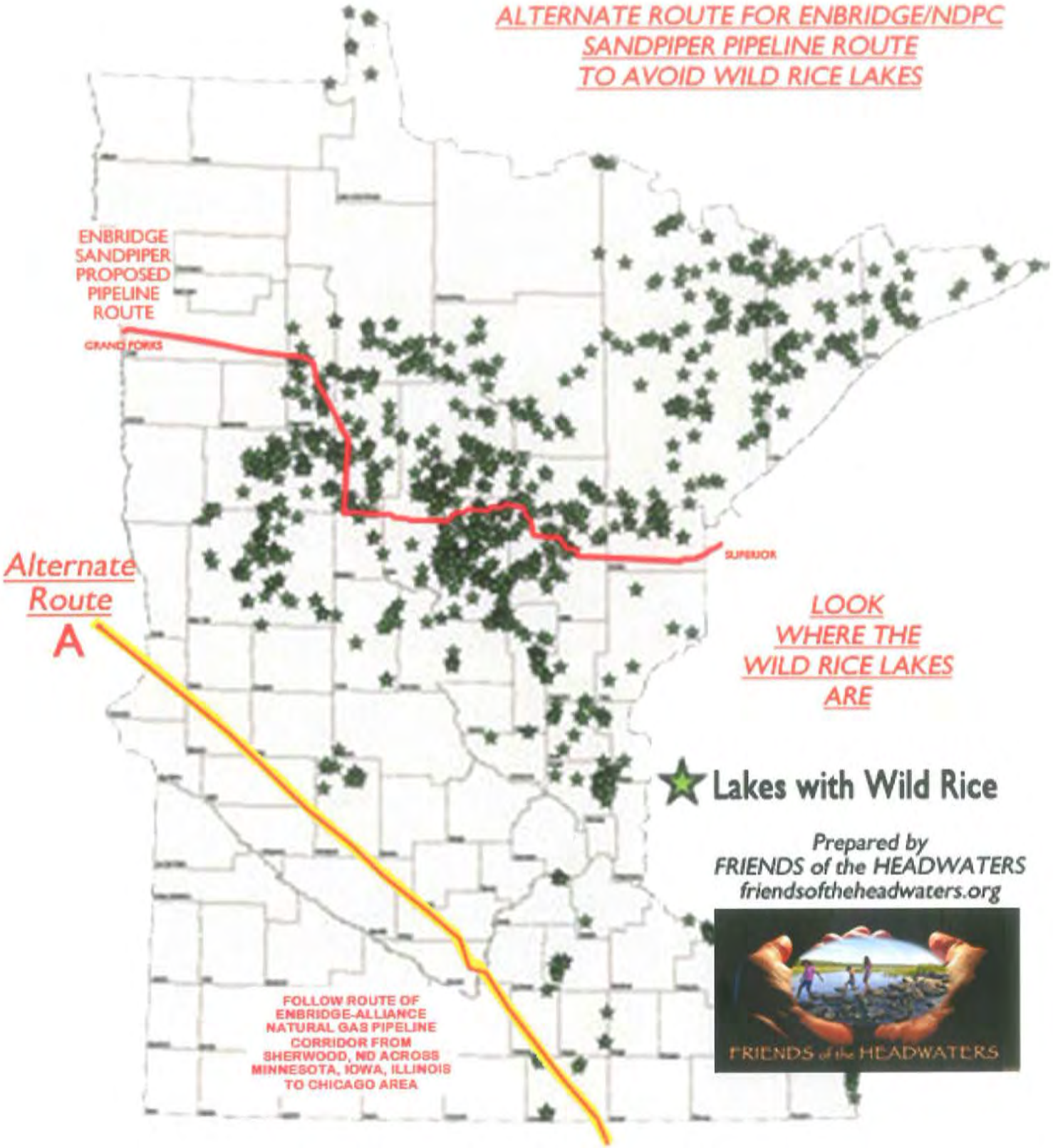


This Class 5 Sensitivity map shows areas where Class 5 automotive waste disposal wells are likely to present a threat to underground sources of drinking water based on geological conditions. The term "Class 5" refers to a broad category of disposal wells defined under federal regulations. Structures such as the drain fields for septic systems, dry wells, and underground gravel pockets that dispose of fluids used by internal combustion engines are identified as automotive waste disposal wells. Fluids include hydraulic fluid, antifreeze, grease, oil, gasoline, diesel fuel, brake fluid, and transmission fluid.

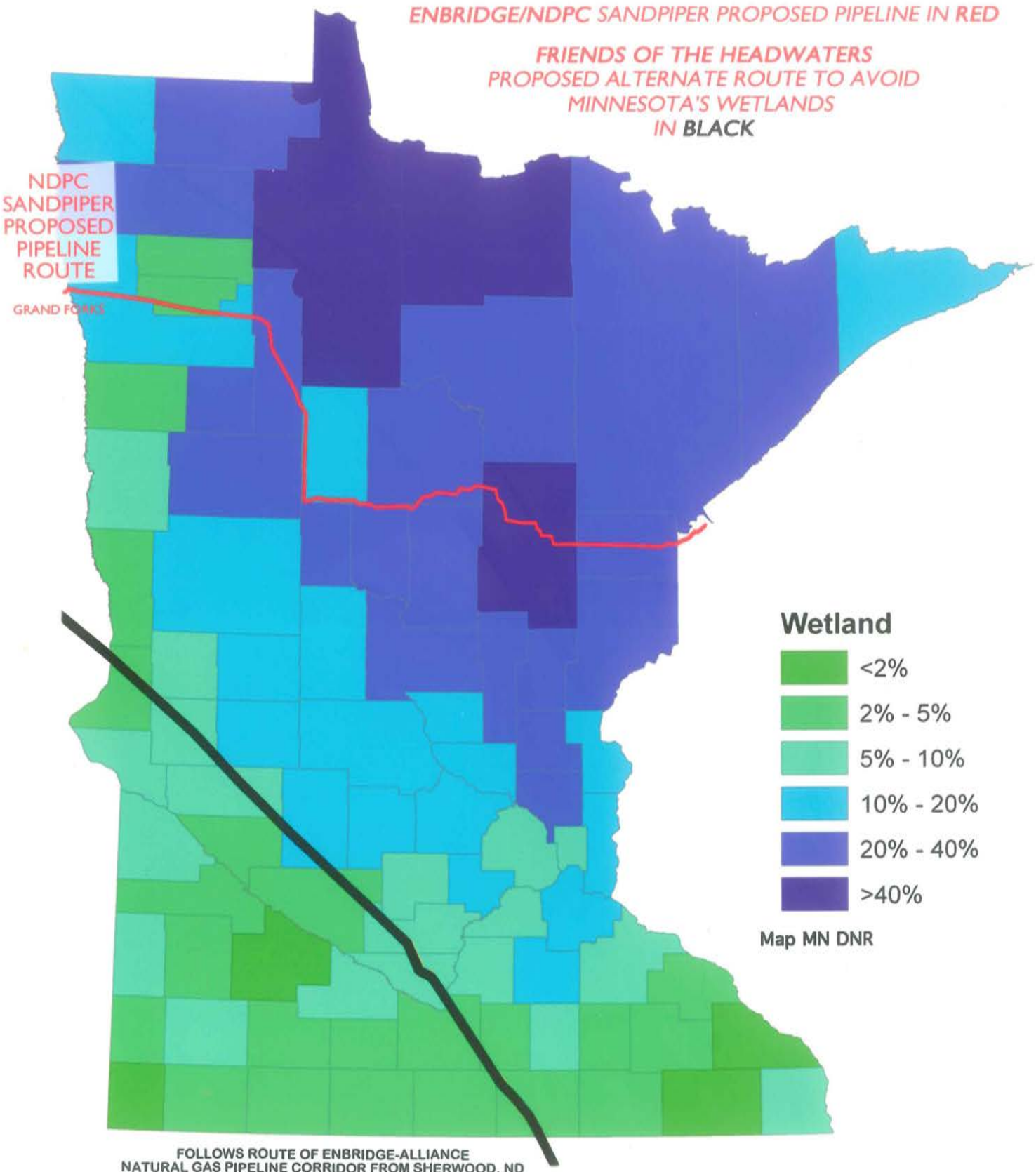
If those soils are sensitive to automotive waste fluids, IMAGINE their sensitivity to oil from pipeline leak or rupture.

Map prepared by
Friends of the Headwaters
www.friendsoftheheadwaters.org

MINNESOTA MDH DEPARTMENT OF HEALTH


ALTERNATE ROUTE FOR ENBRIDGE/NDPC
SANDPIPER PIPELINE ROUTE
TO AVOID WILD RICE LAKES
ENBRIDGE SANDPIPER PROPOSED PIPELINE ROUTE
GRAND FORKS
SUPERIOR
Alternate Route A
LOOK WHERE THE WILD RICE LAKES ARE
Lakes with Wild Rice
Prepared by
FRIENDS of the HEADWATERS
friendsoftheheadwaters.org
FRIENDS of the HEADWATERS
FOLLOW ROUTE OF ENBRIDGE-ALLIANCE NATURAL GAS PIPELINE CORRIDOR FROM SHERWOOD, ND ACROSS MINNESOTA, IOWA, ILLINOIS TO CHICAGO AREA

Friends of the Headwaters
proposed NDPC Sandpiper pipeline
Alternate Route A

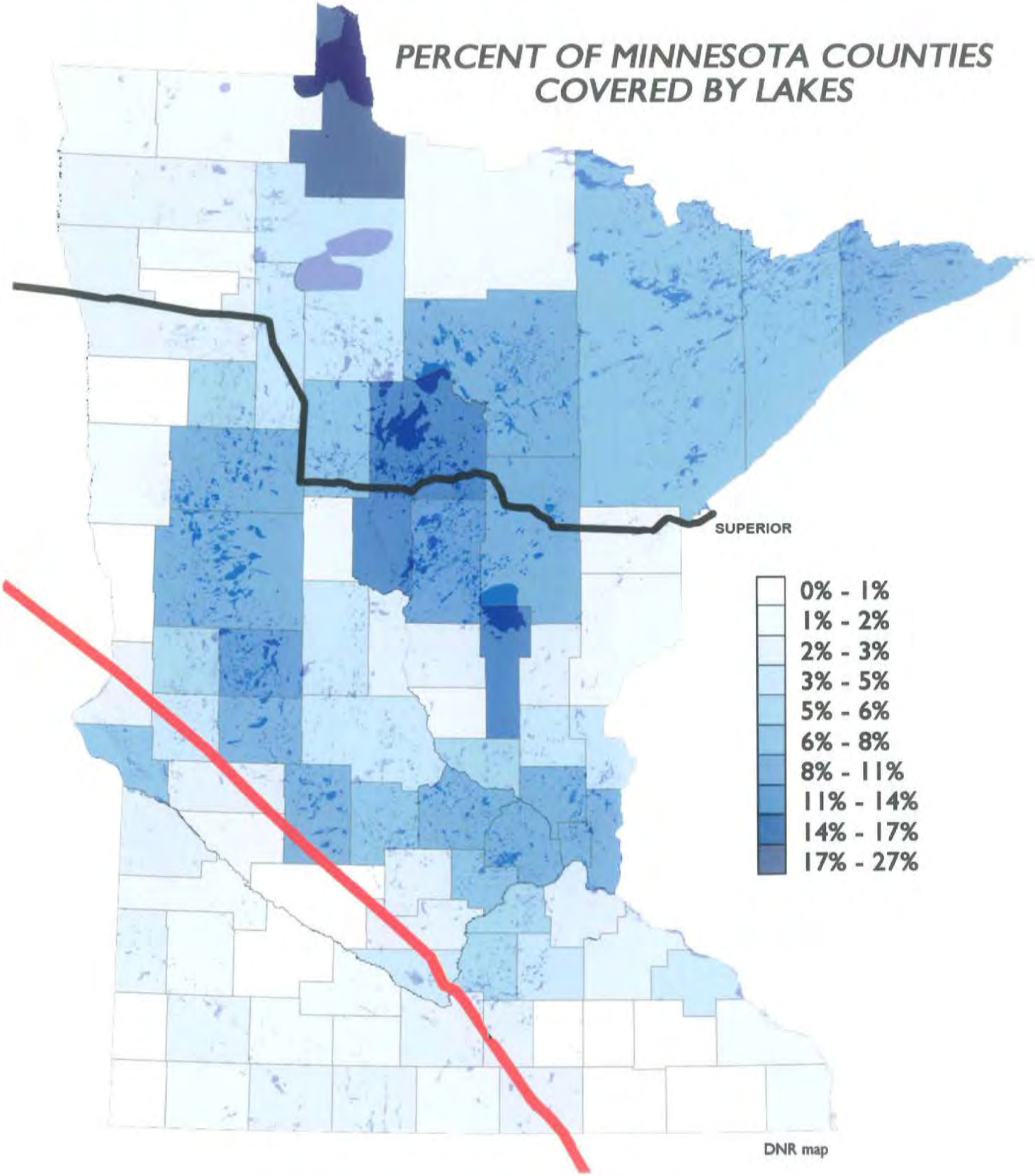


FOLLOWS ROUTE OF ENBRIDGE-ALLIANCE
NATURAL GAS PIPELINE CORRIDOR FROM SHERWOOD, ND
ACROSS MINNESOTA, IOWA, ILLINOIS
TO CHICAGO AREA

Friends of the Headwaters

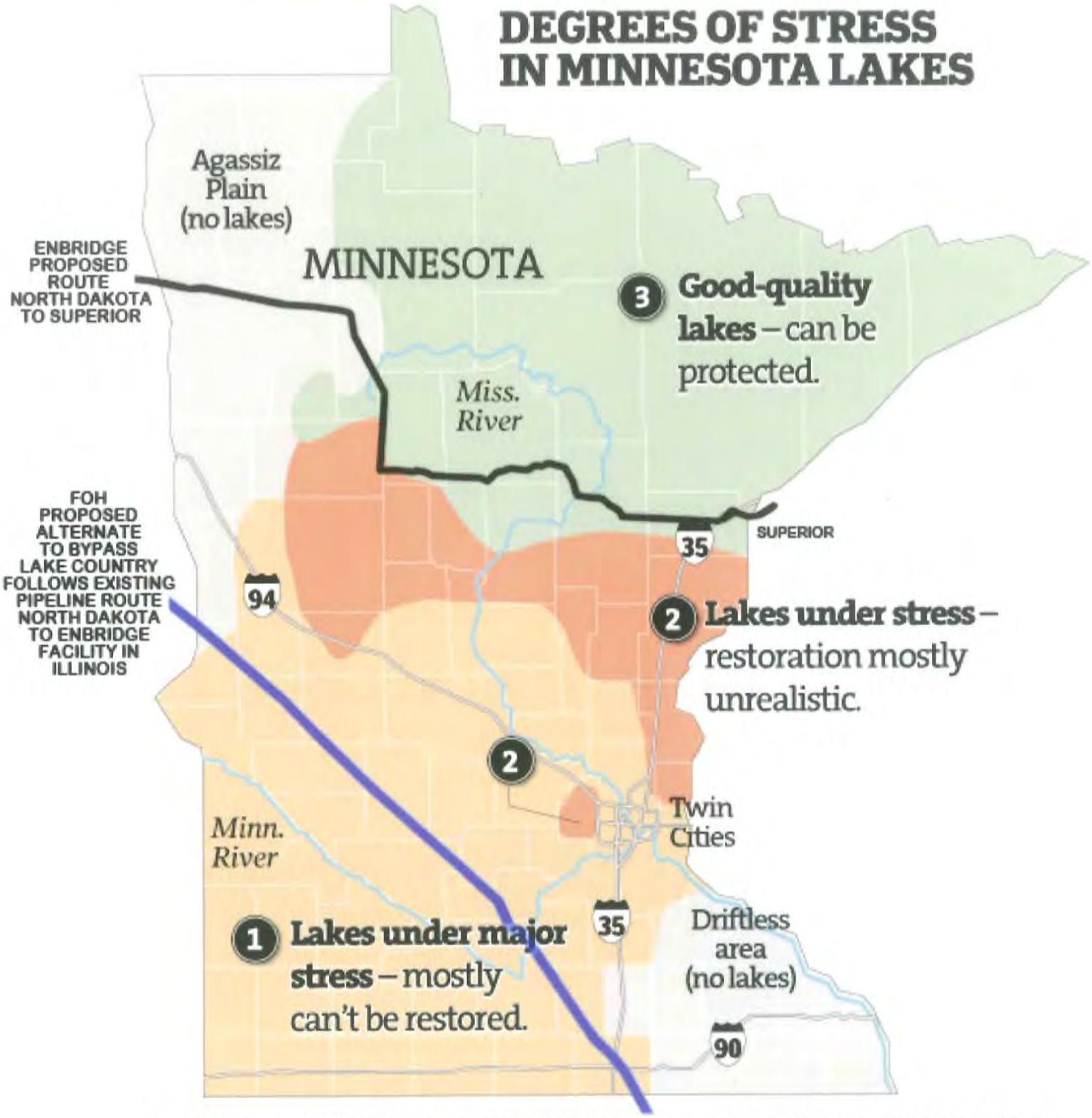
Enbridge Sandpiper pipeline route

FOH Alternate Route (SA-04)



DNR map

Friends of the Headwaters
NDPC Sandpiper pipeline
FOH Alternate Route (SA-04)



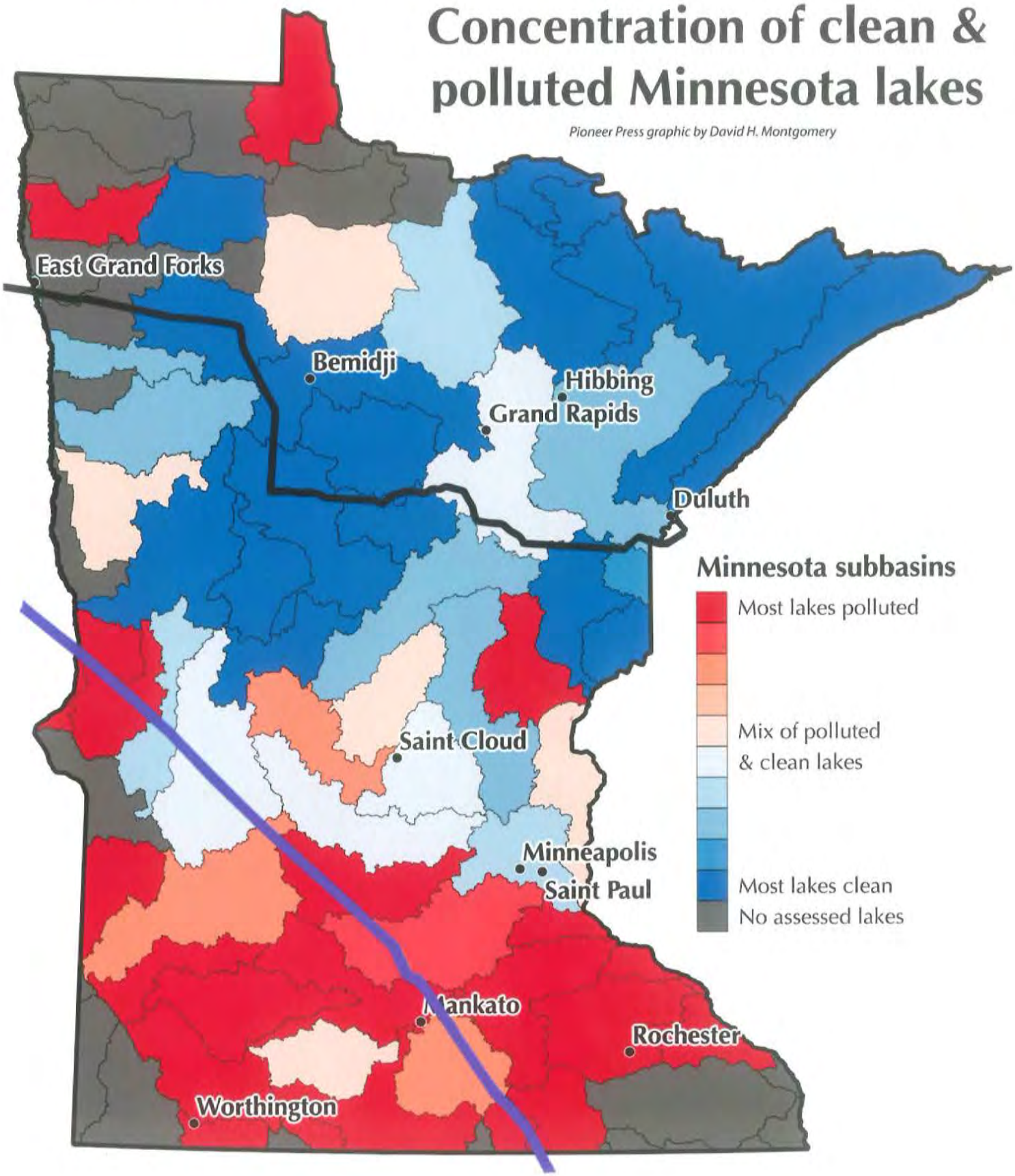
Source: Provided by Ron Way using information from the Minnesota Department of Natural Resources and the U.S. Environmental Protection Agency

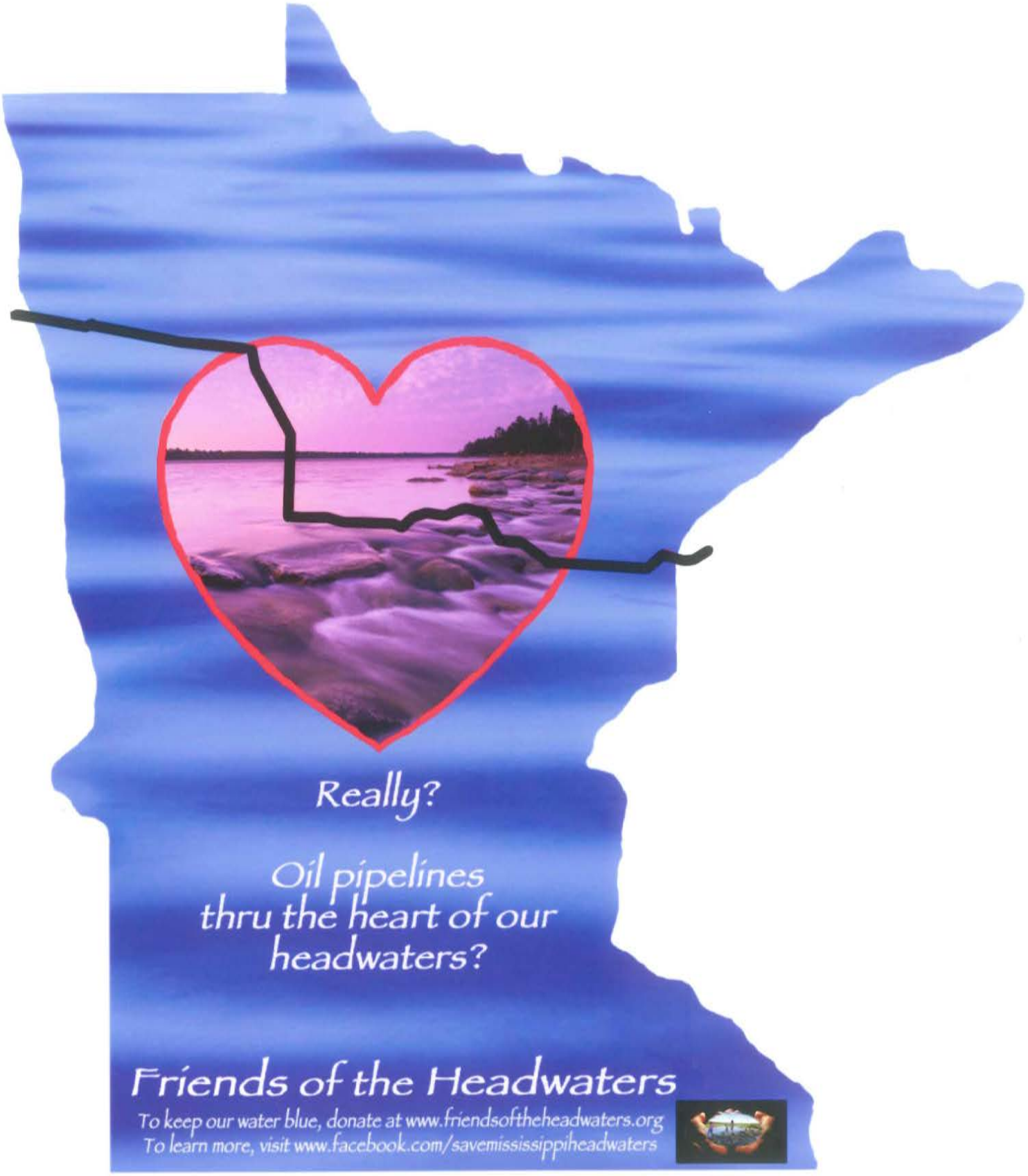
MARK BOSWELL • Star Tribune

Friends of the Headwaters

Enbridge Sandpiper & Line 3 portion proposed pipelines

FOH Alternate Route (SA-04)

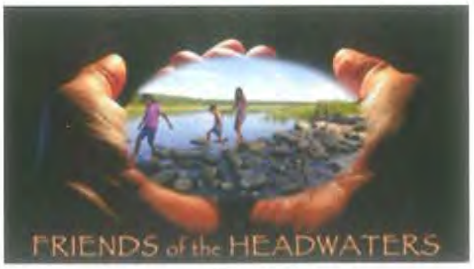


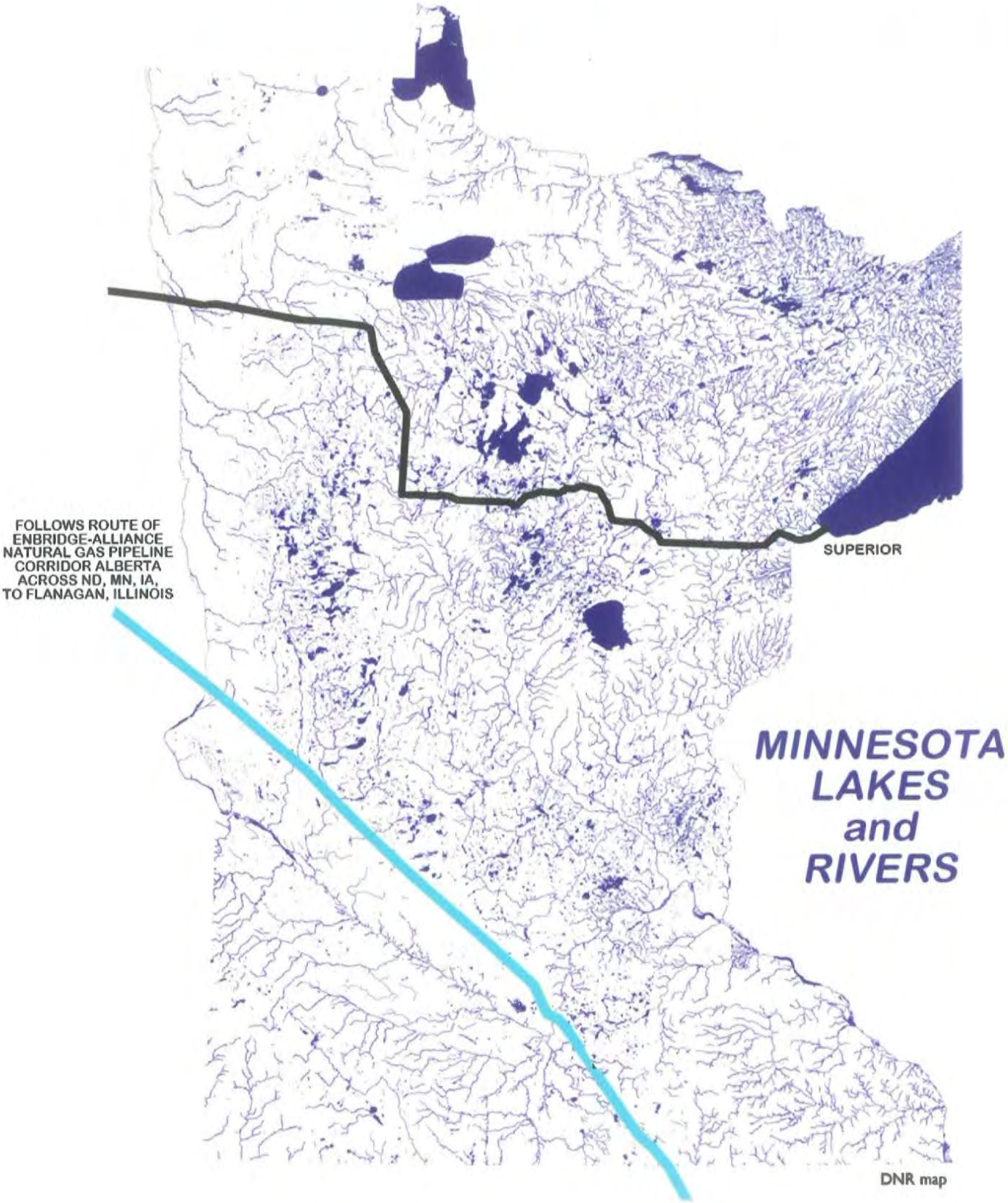

Really?
Oil pipelines
thru the heart of our
headwaters?
Friends of the Headwaters
To keep our water blue, donate at www.friendsoftheheadwaters.org
To learn more, visit www.facebook.com/savemississippiheadwaters

Friends of the Headwaters

Enbridge Sandpiper pipeline route

FOH Alternate Route (SA-04)





DNR map

Minnesota Land Cover

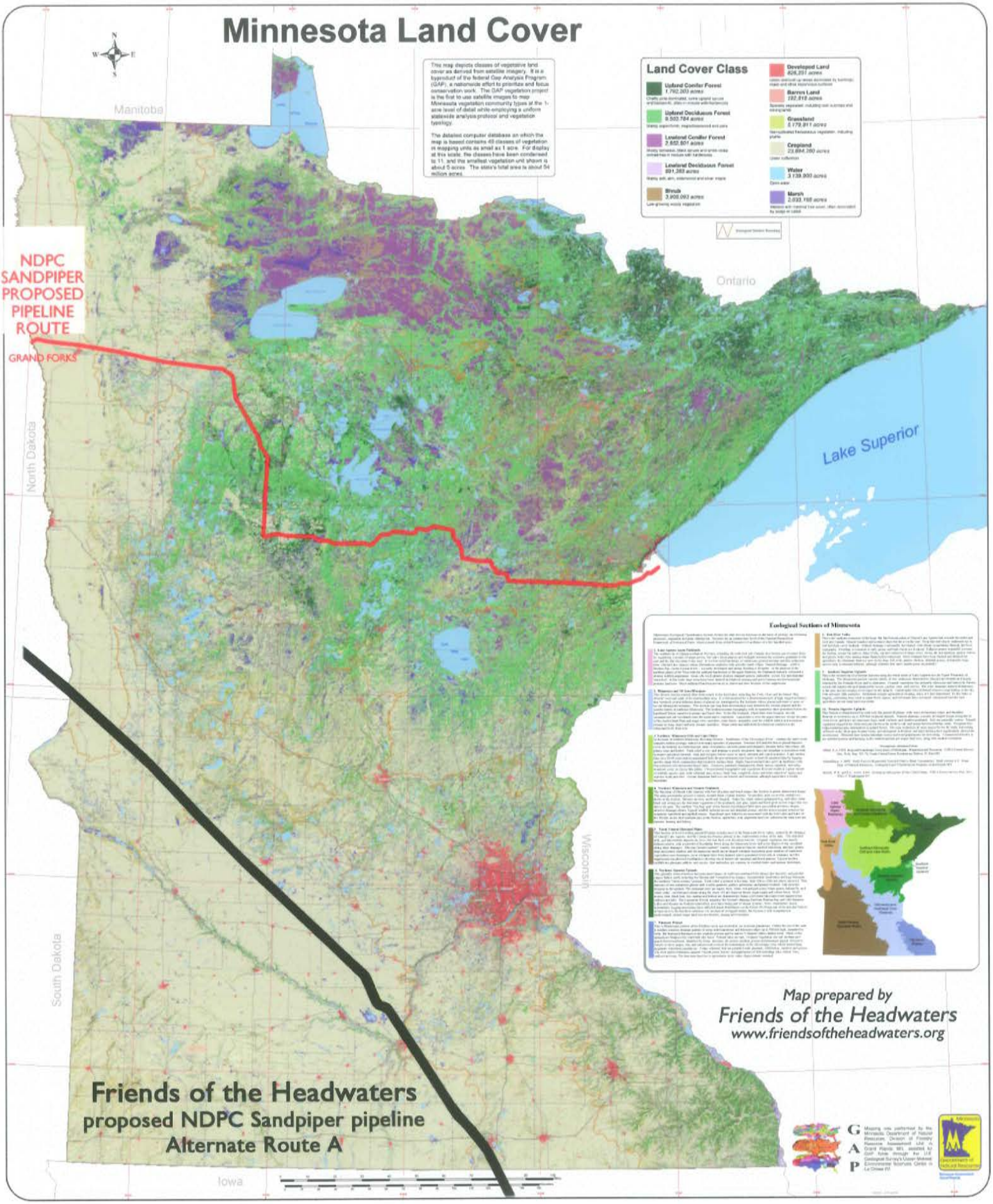
This map depicts classes of vegetative land cover as derived from satellite imagery. It is a byproduct of the federal Gap Analysis Program (GAP), a nationwide effort to prioritize and focus conservation work. The GAP vegetation project is the first to use satellite images to map Minnesota vegetation community types at the 1-acre level of detail while employing a uniform statewide analysis protocol and vegetation typology.

The detailed computer database on which the map is based contains 49 classes of vegetation in mapping units as small as 1 acre. For display at this scale, the classes have been condensed to 11, and the smallest vegetation unit shown is about 5 acres. The state's total area is about 54 million acres.

Land Cover Class

- **Upland Conifer Forest** 1,792,203 acres — Chiefly pine dominated, some upland spruce and balsam fir, often in mixture with hardwoods
- **Upland Deciduous Forest** 9,503,784 acres — Mainly aspen/birch, maple/basswood and oak
- **Lowland Conifer Forest** 2,652,601 acres — Mostly tamarack, black spruce and white cedar, sometimes in mixture with hardwoods
- **Lowland Deciduous Forest** 891,283 acres — Mainly ash, elm, cottonwood and silver maple
- **Shrub** 3,900,093 acres — Low-growing woody vegetation
- **Developed Land** 626,251 acres — Urban, statewide up-dated, dominated by buildings, roads and other impervious surfaces
- **Barren Land** 122,818 acres — Sparsely vegetated, including rock outcrops and strip pits
- **Grassland** 5,179,811 acres — Non-cultivated herbaceous vegetation, including prairie
- **Cropland** 23,894,280 acres — Under cultivation
- **Water** 3,139,900 acres — Open water
- **Marsh** 2,033,155 acres — Wetlands with herbaceous cover, often dominated by sedge or cattail

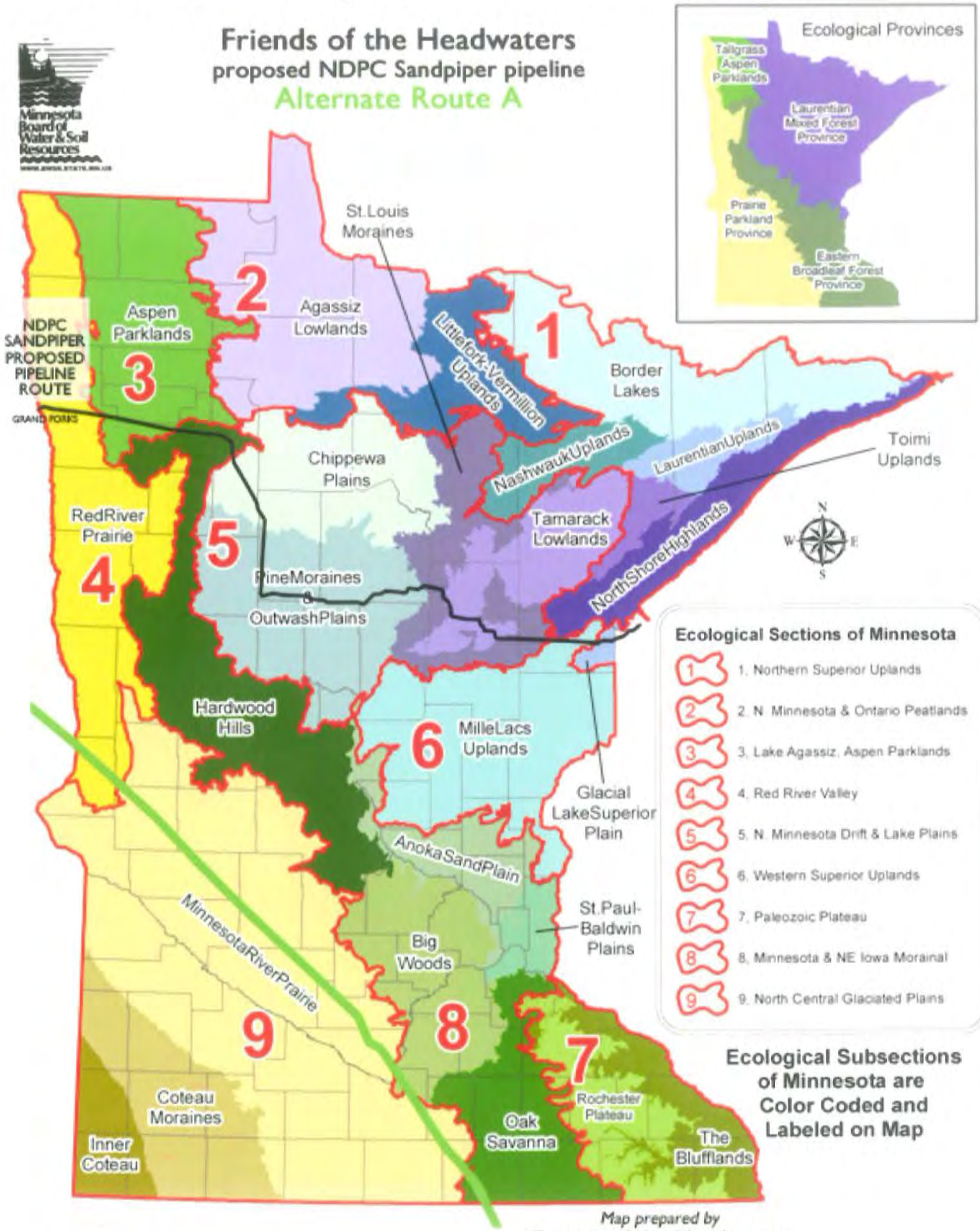
Biological Section Boundary



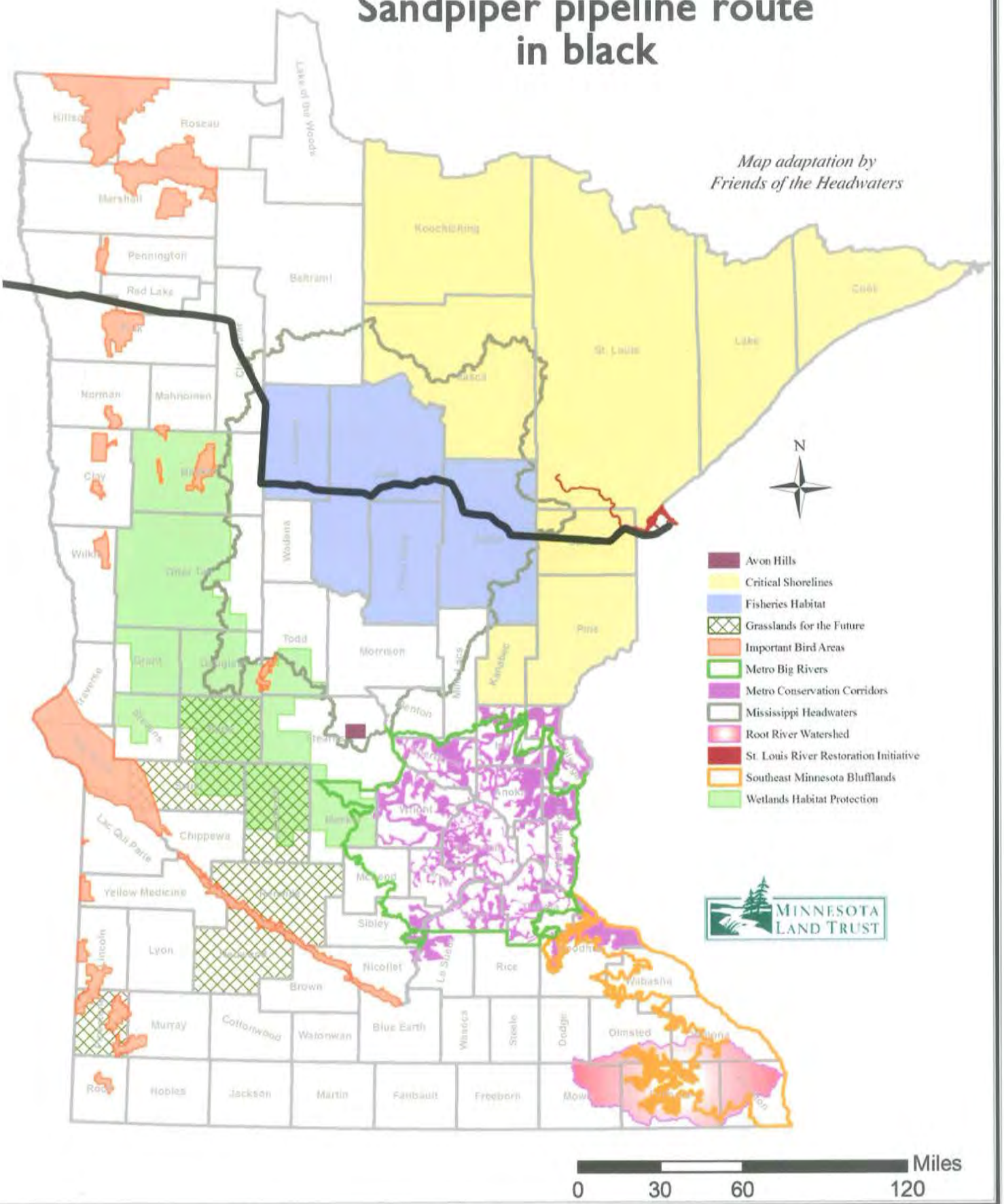
Map prepared by
Friends of the Headwaters
www.friendsoftheheadwaters.org

Mapping was performed by the Minnesota Department of Natural Resources Division of Forestry Resource Assessment Unit in Grand Rapids, MN, assisted by Gap Tools through the US Geological Survey's Upper Midwest Environmental Sciences Center in La Crosse WI.

Minnesota Ecological Sections and Subsections

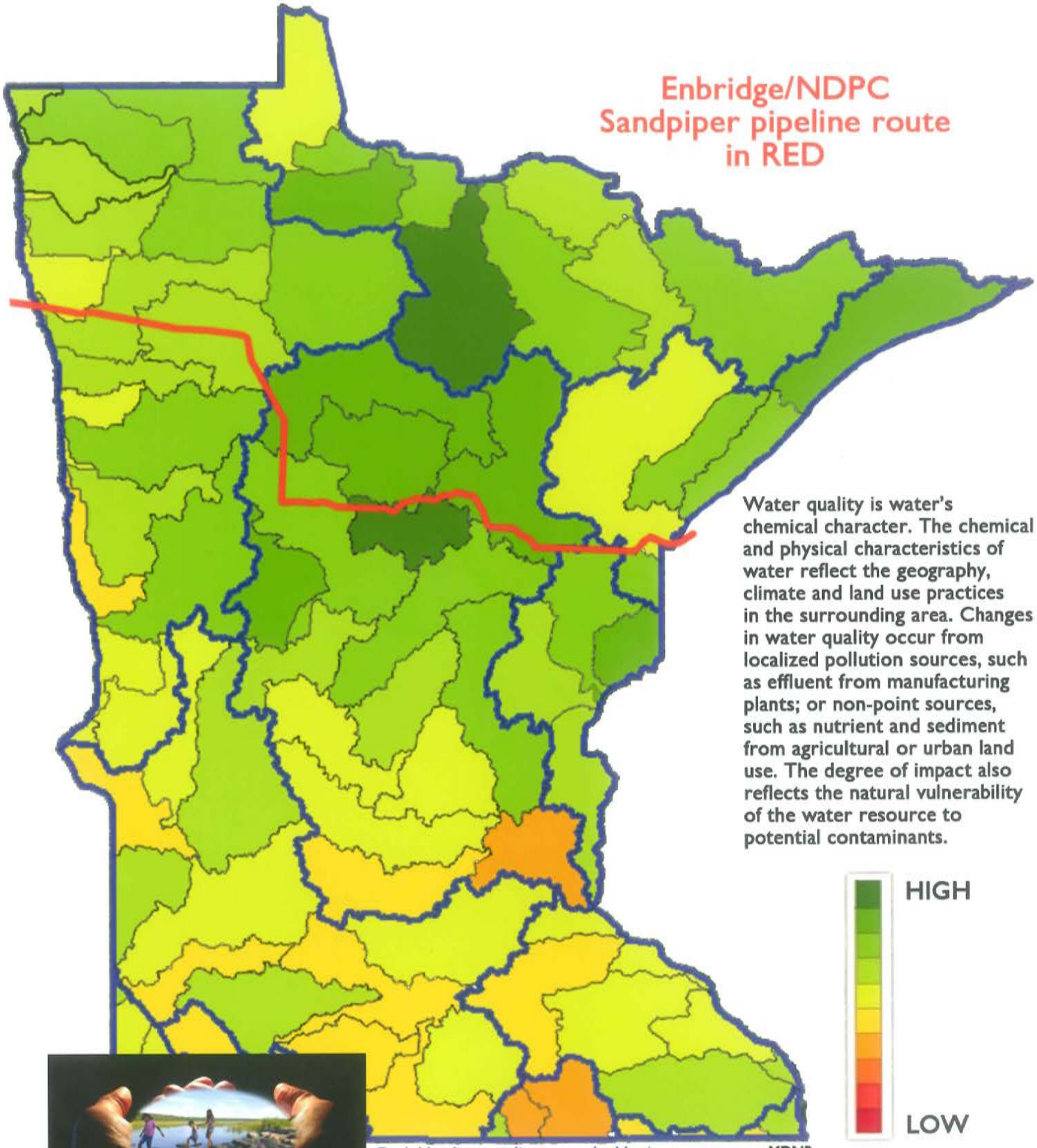


Enbridge/NDPC Sandpiper pipeline route in black



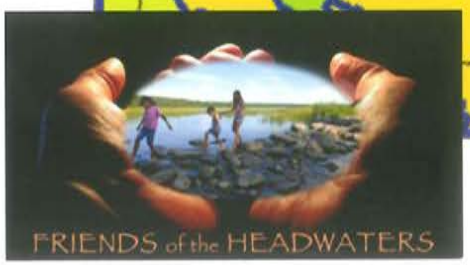
FRIENDS of the HEADWATERS

MINNESOTA WATER QUALITY ZONES



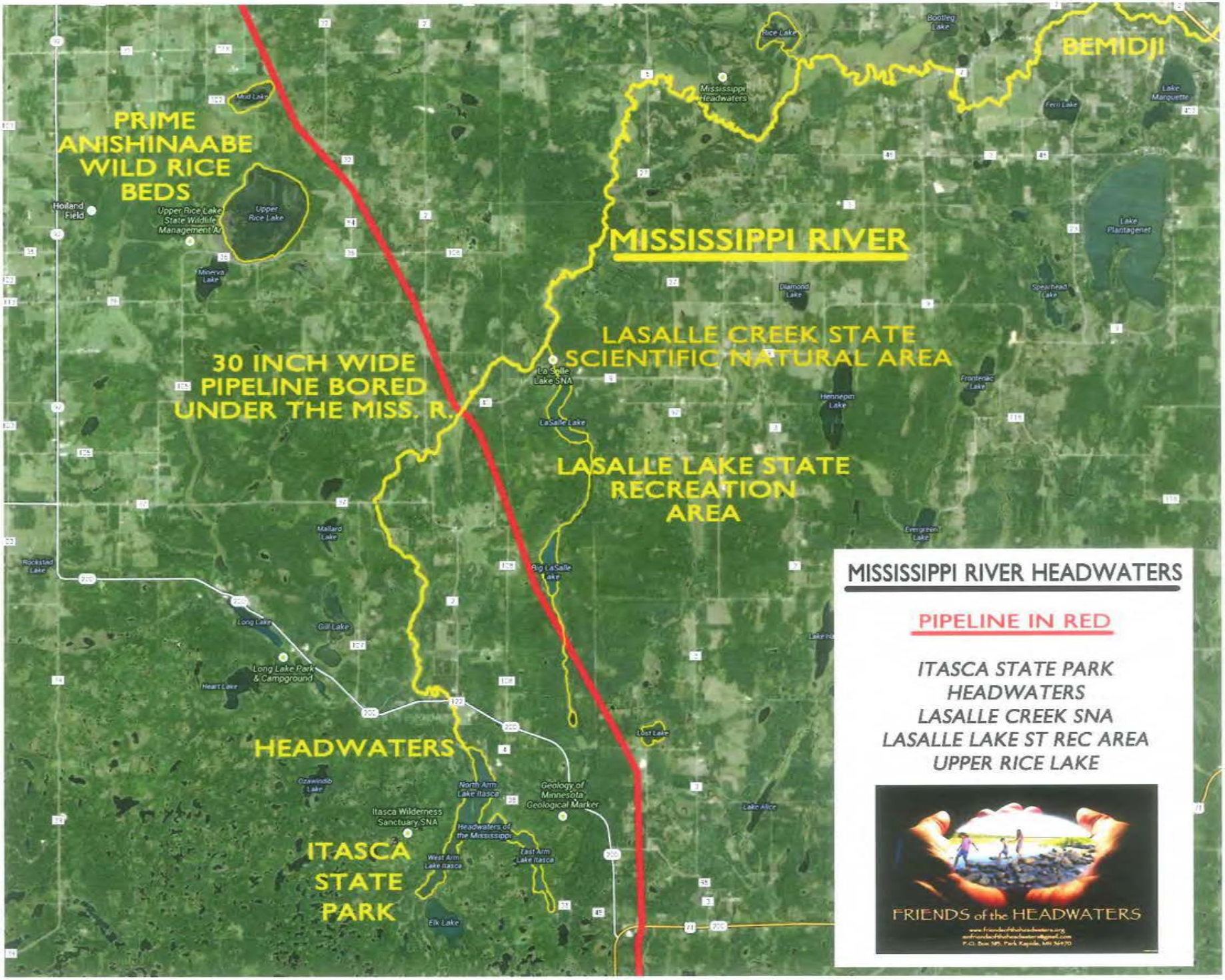
Water quality is water's chemical character. The chemical and physical characteristics of water reflect the geography, climate and land use practices in the surrounding area. Changes in water quality occur from localized pollution sources, such as effluent from manufacturing plants; or non-point sources, such as nutrient and sediment from agricultural or urban land use. The degree of impact also reflects the natural vulnerability of the water resource to potential contaminants.

Dark blue lines outline watershed basins map source: MDNR

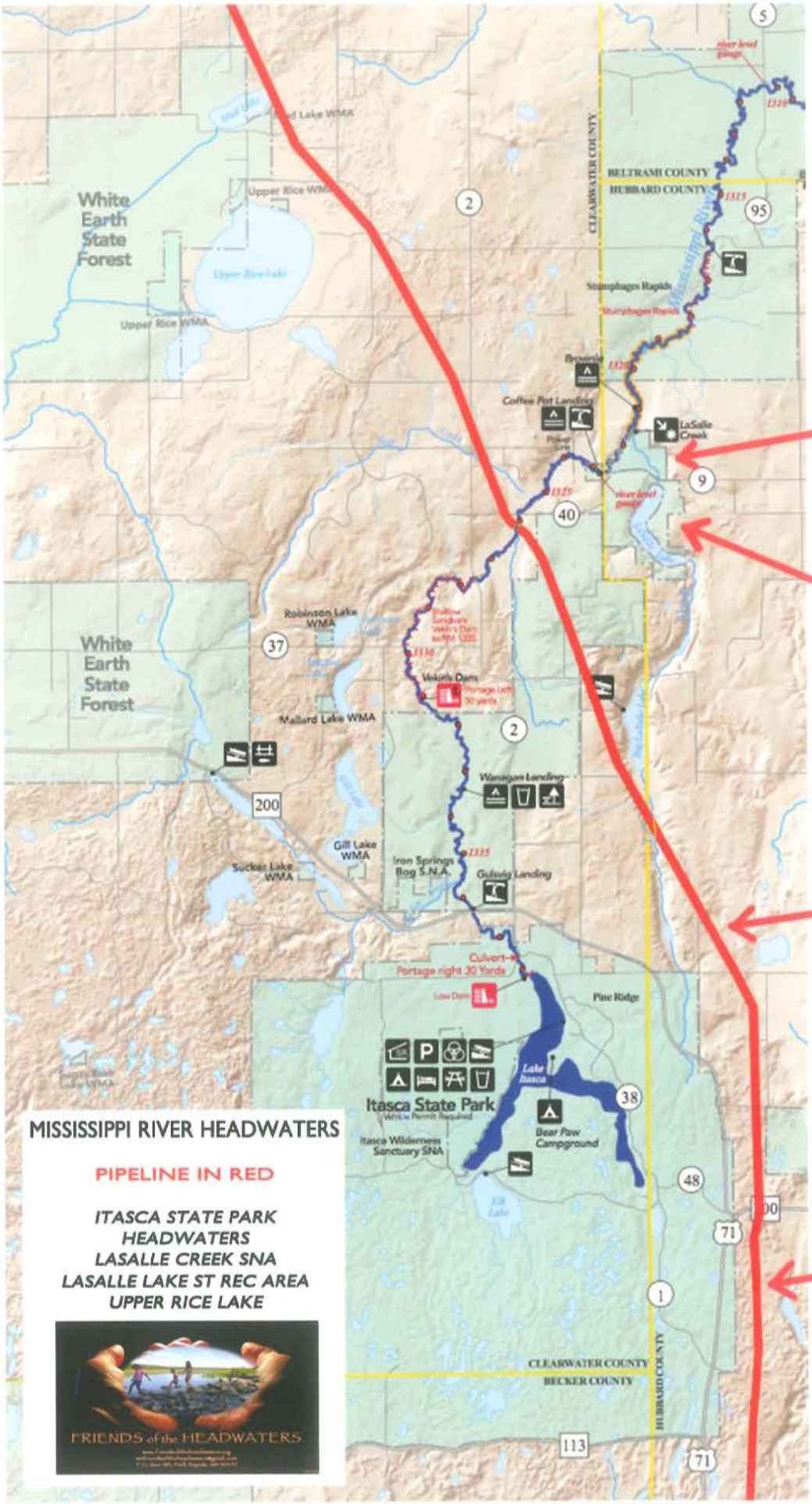


Friends of the Headwaters
ROUTE COMPARISON MAP

Friends of the Headwaters
ROUTE COMPARISON MAP


PRIME ANISHINAABE WILD RICE BEDS
BEMIDJI
MISSISSIPPI RIVER
LASALLE CREEK STATE SCIENTIFIC NATURAL AREA
30 INCH WIDE PIPELINE BORED UNDER THE MISS. R.
LASALLE LAKE STATE RECREATION AREA
HEADWATERS
ITASCA STATE PARK
Upper Rice Lake
Upper Rice Lake State Wildlife Management Ar
Hoiland Field
Mississippi Headwaters
Rice Lake
Bootleg Lake
Lake Marquette
Lake Plantagenet
Spearhead Lake
Diamond Lake
Frontenac Lake
Hennepin Lake
Evergreen Lake
La Salle Lake SNA
LaSalle Lake
Big LaSalle Lake
Mallard Lake
Long Lake
Gull Lake
Long Lake Park & Campground
Heart Lake
Lost Lake
Lake Alice
Ozawindib Lake
North Arm Lake Itasca
Geology of Minnesota Geological Marker
Itasca Wilderness Sanctuary SNA
Headwaters of the Mississippi
West Arm Lake Itasca
East Arm Lake Itasca
Elk Lake
Minerva Lake
Mud Lake
Rockstad Lake
MISSISSIPPI RIVER HEADWATERS
PIPELINE IN RED
ITASCA STATE PARK
HEADWATERS
LASALLE CREEK SNA
LASALLE LAKE ST REC AREA
UPPER RICE LAKE
FRIENDS of the HEADWATERS

SANDPIPER & LINE 3 REROUTE PROXIMITY TO LA SALLE LAKE SNA & SRA

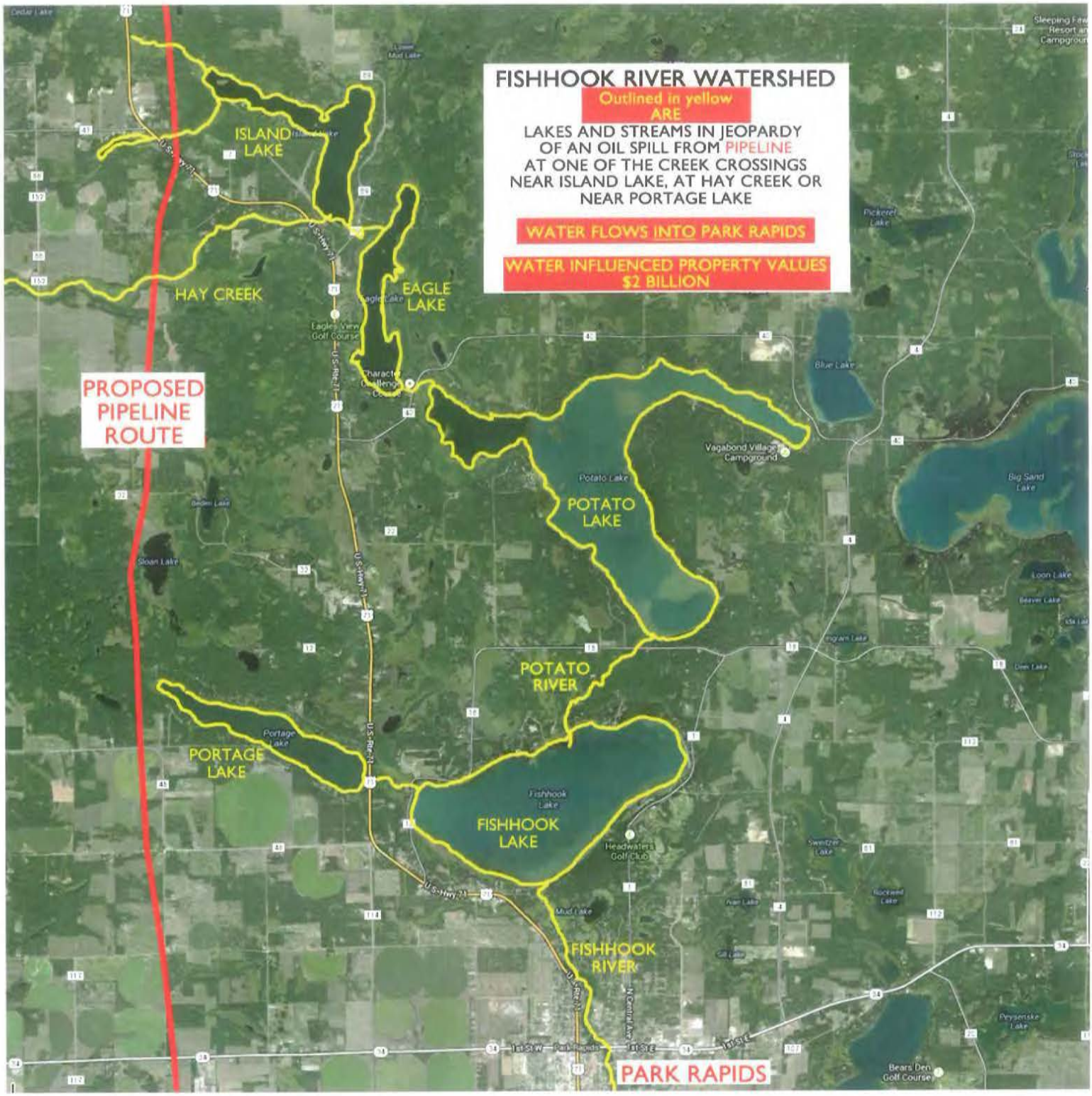


LaSalle Lake SNA

LaSalle Lake State Recreation Area

SANDPIPER LINE 3 REROUTE CORRIDOR

LOOK HOW CLOSE TO ITASCA STATE PARK



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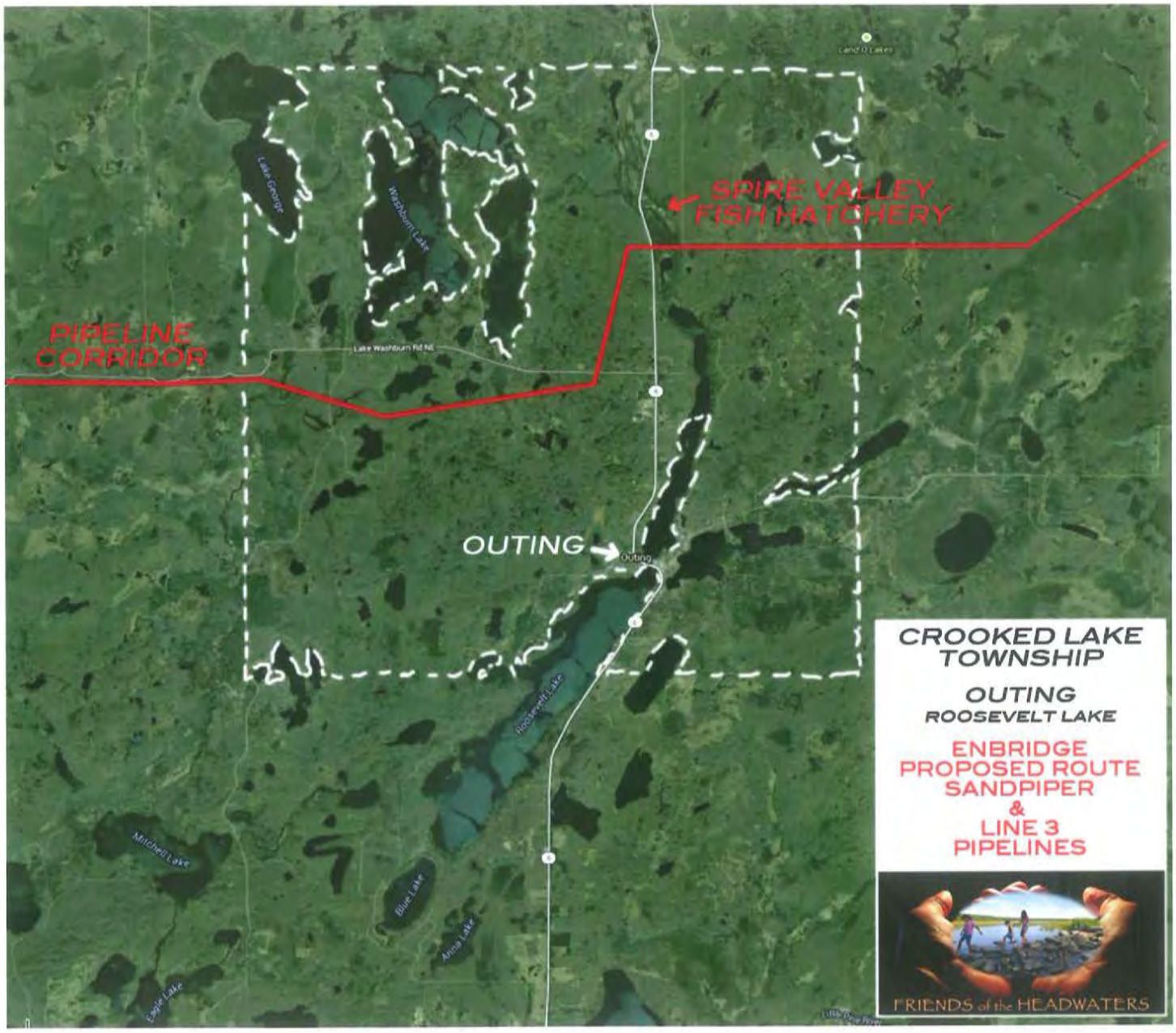
Park Rapids, MN 56470
mnfriendsoftheheadwaters@gmail.com
https://www.facebook.com/savemississippiheadwaters
https://www.friendsoftheheadwaters.org


SPIRE VALLEY
FISH HATCHERY
PIPELINE
CORRIDOR
OUTING
Lake George
Washburn Lake
Lake Washburn Rd NE
Land O Lakes
Roosevelt Lake
Mitchell Lake
Blue Lake
Anna Lake
Eagle Lake
CROOKED LAKE
TOWNSHIP
OUTING
ROOSEVELT LAKE
ENBRIDGE
PROPOSED ROUTE
SANDPIPER
&
LINE 3
PIPELINES
FRIENDS of the HEADWATERS

POSITION PAPER - ENBRIDGE/NORTH DAKOTA PIPELINE COMPANY (NDPC) LLC
SANDPIPER PIPELINE PROJECT

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

April 2, 2014

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

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

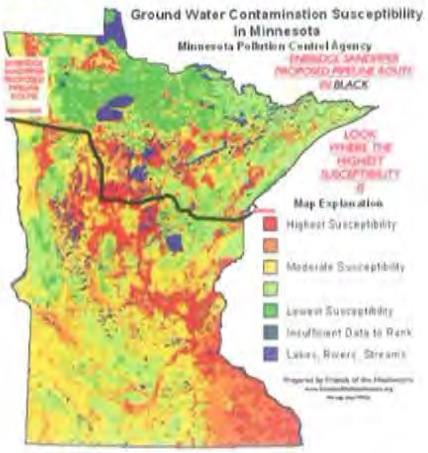
We believe Enbridge/NDPC's proposed "southern corridor" will NOT protect the high quality waters along this route.

Friends of the Headwaters also believes Enbridge intends to proliferate another multiple pipeline corridor with their southern route proposal.

Note: Enbridge presented just that in an investor conference held April 2, 2014 in New York City. See 50th page of their pdf at this link:
http://www.enbridgepartners.com/WorkArea/linkit.aspxLinkIdentifier=id&ItemID=17004

Besides our important residential and recreational lakes Minnesota's best wild rice lakes are also extremely vulnerable to this proposed pipeline. Those lakes are culturally and economically significant to Minnesota's Ojibwa tribes as well as being important food sources for our migratory waterfowl populations.

The "southern corridor" will severely jeopardize the Straight River aquifer in southern Hubbard County. The aquifer is critical as the sole drinking water source for the county seat, Park Rapids. as well as supporting the county's primary agricultural crop, potatoes. Annual revenue from the potato crop approaches $500 million. A leak/rupture in the aquifer would severely impact this agricultural revenue, damage Park Rapids' potable water source, and despoil a renowned brown trout stream, as well.



Hubbard County natural resources support a vibrant tourism community with nearby Itasca State Park, home to the headwaters of America's most famous river, the Mississippi, and with its family-owned lake country resort businesses. The Minnesota Tourism Office estimates $30 million dollars are spent in Hubbard County every vacation season. A catastrophic oil spill on the level of Enbridge's Kalamazoo River spill would devastate the county's tourism business.

Given the high risks to the county, state and private lands and waters along the proposed southern route, *Friends of the Headwaters* strongly disagrees with the PUC/DOC's position that a full environmental impact study (EIS) is not necessary for the confirmation of Enbridge/NDPC's route proposal. A PUC/DOC conducted CEA (comparative environmental analysis) will fail to meet MEPA standards. *Friends of the Headwaters* believes a complete EIS with the requisite and cumulative leak/spill scenarios and assessments for the lakes and rivers, trout streams, wild rice beds, lake homes and resorts, ground water sources, farmlands, wetlands, wildlife, local communities and their economies will validate Friends of the Headwaters' position of moving the Sandpiper route to a lower risk part of the state.

Therefore, *Friends of the Headwaters* is proposing a number of alternate routes for the Enbridge/NDPC Sandpiper pipeline that do not traverse any of Minnesota's clearest and cleanest lakes, rivers, trout streams, and fragile aquifers. Details and maps to follow.

Prior to presenting the details and maps *Friends of the Headwaters* wants it known that its technical consultants' requests for the Enbridge GIS mapping software were ignored by the company and the PUC. Access to the software was ultimately granted a few days before the closing date for public comment on route alternatives, but much too late to be of effective use by *Friends of the Headwaters* consultants. Maps were constructed from satellite aerial photography, road maps, DNR & PCA maps and existing pipeline corridor maps available at various sources on the Internet including Enbridge's website.

Before preparing these alternate routes *Friends of the Headwaters* first used the document 7852.1900 "Criteria for Pipeline Route Selection"
made available at the March 12, 2014 PUC/Enbridge Sandpiper Public Hearing in Park Rapids, MN to determine the fallibility of Enbridge/NDPC's proposed southern corridor route. *Friends of the Headwaters'* comparative economic and environmental analysis of the impact of Enbridge/NDPC's Sandpiper pipeline upon the listed "Criteria for Pipeline Route Selection" fell short of meeting the requirements to maintain, sustain and protect the lands, waters and people along the proposed corridor.

Under Subp. 3. Criteria:
A. human settlement, existence and density of populated areas, existing and planned future land use, and management plans.

Hubbard County realizes $34 million dollars annually in tax revenue(2012 data). 59% of its properties are water-influenced, meaning either on or have a view of a lake or river. Those parcels yield a $20 million dollar figure. The Fishhook Chain of Lakes watershed is mostly in Todd and Arago Townships. Taxes on the water-influenced properties in those two townships is about $2 million annually.

If a large rupture on the order of the Enbridge 1991 Grand Rapids, MN spill (1.7 million gallons) occurs at Hay Creek near the top of that watershed, it would dramatically impact the property values on those lakes resulting in a significant loss of tax revenue to the county, state, Park Rapids and its school district. It will be years before the county recovers from the damage. Not only will it incur the loss of tax revenues, but also the loss of residents, small businesses, tourists, and property values.

B. the natural environment, public and designated lands, including but no limited to natural areas, wildlife habitat, water, and recreational lands.

Any pipeline leak/spill/rupture will severely impact the sustainable environmental quality of life in Hubbard County. Itasca State Park, Mississippi River headwaters, LaSalle Scientific and Natural Area, Straight River brown trout fishery, Hay Creek and the Fishhook Chain of Lakes watershed, Straight River aquifer, Shell River, the Crow Wing River, and the many other nearby lakes all support and provide numerous recreational opportunities, swimming, fishing, hunting, hiking, biking, bird watching, boating, and others. $30 million tourism dollars a season are at risk.

C. lands of historical, archaeological and cultural significance

The history of Native Americans and the early explorers in and around Itasca State Park is an asset to drawing tourists to the park. The wild rice waters in Hubbard and Clearwater Counties are culturally and economically significant. The proposed Sandpiper route is dangerously close to Upper Rice Lake, the Anishinaabe's best wild ricing lake in Clearwater County. The wild rice harvested there is commercially and domestically important to the White Earth Ojibwa.

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

All future business, residential, retirement and agricultural growth will be impacted by any pipeline leak/spill/rupture. Over 500 jobs and $500 million dollars in revenue/year is generated by the potato crop alone. Besides potatoes and the commodity crops of corn and beans, fresh fruit and vegetables are also grown and marketed locally to residents and tourists by smaller farms operating within the Straight River aquifer. Farm incomes and tourists dollars drive the local small business economy.

Although some small businesses may see a short term gain from pipeline construction, the long term economic vitality of the community, its businesses and people may not recover from a spill.

Enbridge/NDPC touts the tax payments it will be making annually to Hubbard County. The public has heard two figures, either $3 million or $5 million dollars, but relative to the value of the Bakken crude proposed to pass through the county each year, $14.6 billion dollars, that tax revenue seems woefully short for the risks assumed. What costs will the county incur for infrastructure repair after construction? What will be the costs of training police, fire, paramedic and medical personnel in the special hazards of oil spills and fires? We haven't heard anything about the PUC requiring a significant Escrow account to ensure funds are available when a pipeline fails.

The state and its northern counties derive income from their forest lands. Those forest taken out of production along "Greenland" portions of the proposed route will mean a loss of timber jobs and income, as well as a loss of habitat for wildlife, especially birds.

E. pipeline cost and accessibility

How much higher are the construction costs of multiple bores under rivers and streams? What are the contingency plans and costs for controlling "frackouts" in stream beds during a bore. Friends of the Headwaters has learned a "frackout" occurred on nearly every stream or river bore during this area's last pipeline construction project in 2007. What are the costs and issues for winter construction of wetland areas along the route? How do the company and clean-up agencies access those wetlands areas in non-winter seasons if and when a leak/spill/rupture occurs? What are the economic consequences of summer construction and congestion issues with roads and traffic? How will availability of lodging not just for construction crews but also for tourists be affected. How will the compatibility of construction workers be with tourists, residents and local businesses. How trustworthy and reliable will these workers be with respect to property and paying for services. Some resort owners have informed Friends of the Headwaters they will not provide lodging for pipeline workers due to previous pipeline worker negative experiences. Will Enbridge/NDPC be financially responsible for covering damages or lost income from disreputable and irresponsible workers? *Friends of the Headwaters* believes only a properly executed EIS will provide the comprehensive assessment for the above scenarios.

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

Although Enbridge/NDPC is proposing to use existing energy corridors in Hubbard County numerous landowners along the route have complained of poor easement usage, property damage, poor restoration or reclamation efforts, and generally bad relations with other pipeline companies. They are skeptical of Enbridge claims to treat them better given accounts they have seen or heard from landowners on the Enbridge northern

pipeline corridor. Landowners along the proposed route are also concerned of the liability issues regarding detection and reporting of any leaks or spills. Attorneys have warned landowners to be wary of the language within the Enbridge/NDPC easement contract.

G. natural resources and features

Friends of the Headwaters has no faith in Enbridge/NDPC's word they can safely protect the lands and waters of Minnesota's lake country.

All pipelines leak eventually. While conducting a complete EIS for the Pebble Mine near Bristol Bay, Alaska, the EPA examined the history of pipeline spills relative to the age and mileage of all pipelines. They determined that every pipeline will leak at least once every 30 years over every 30 miles of length. Not surprising the history of Enbridge spills along their northern corridor in Minnesota fits that profile quite well. To quote from a 2003 MPCA report to the NTSB: "nearly three dozen non-third-party spills, leaks or ruptures on just one Enbridge 34 inch line between 1972 and 2003. About 87% of the petroleum gallons spilled from all Minnesota pipelines in the period 1991 to 2002 was from that Enbridge line. This is equal to about 48% of the reported gallons of petroleum spilled from all sources in Minnesota during that period. Included in the Enbridge 34 inch line spills are the 1.7 million gallon rupture in 1991 in Grand Rapids and the 250,000 gallon rupture on July 4, 2002 in Cohasset. 300,000 gallons of the Grand Rapids spilled flowed to a river. Luck with the timing of the spill and river ice conditions kept thousands of gallons of crude from entering the Mississippi River. Oil in the Mississippi would likely have fouled the St. Cloud, St. Paul, and Minneapolis drinking water intakes for months. Likewise the Cohasset spill could have easily entered the Mississippi River if it had happened in a different segment of that 34 inch pipeline."

The Mississippi River Headwaters, Itasca State Park, the Straight River aquifer and brown trout stream, the Shell and Crow Wing Rivers, the Fishhook Chain of Lakes, Upper Rice Lake and other wild rice lakes, and some of the clearest lakes in the state are all at risk from this proposed Sandpiper southern corridor and Enbridge's stated plans to make it a multiple pipeline corridor.

H. the extent to which human or environmental effects are subject to mitigation by regulatory control and by application of the permit conditions contained in Minn. Rule, part 7852.3600 for pipeline right-of-way preparation, construction, cleanup, and restoration practices.

Enbridge's history with the Alberta Clipper line, Line 3 and other lines in the northern corridor is well known as stated above. The PUC completely ignored the numerous landowner complaints of Enbridge's poor behavior, cleanup, followup, and restoration efforts or lack thereof on the Certificate of Route and Need Applications for the Alberta Clipper line. *Friends of the Headwaters* has learned some landowners are losing buildings, well houses, wood lots, and in some cases homes to Enbridge/NDPC's easement demands. Eminent domain actions are especially disliked.

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

Now that Enbridge has stated the Line 3 rebuild (NYC Investor Conference 4/2/14) will occur in the Sandpiper "southern corridor", a comprehensive EIS(environmental impact study) conducted by the proper state and federal regulatory authorities is absolutely essential. As previously stated, all leak/spill/rupture risk scenarios must be assessed and fully described for high value resources. The EIS must also compare all reasonable and prudent alternative routes. EIS studies should be required to use GIS software to optimize the potential alternative routes other than Enbridge/NDPC's routes.

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

A project of this magnitude as planned through the heart of *"The Land of 10,000 Lakes"* must conform to the standards prescribed in MEPA.

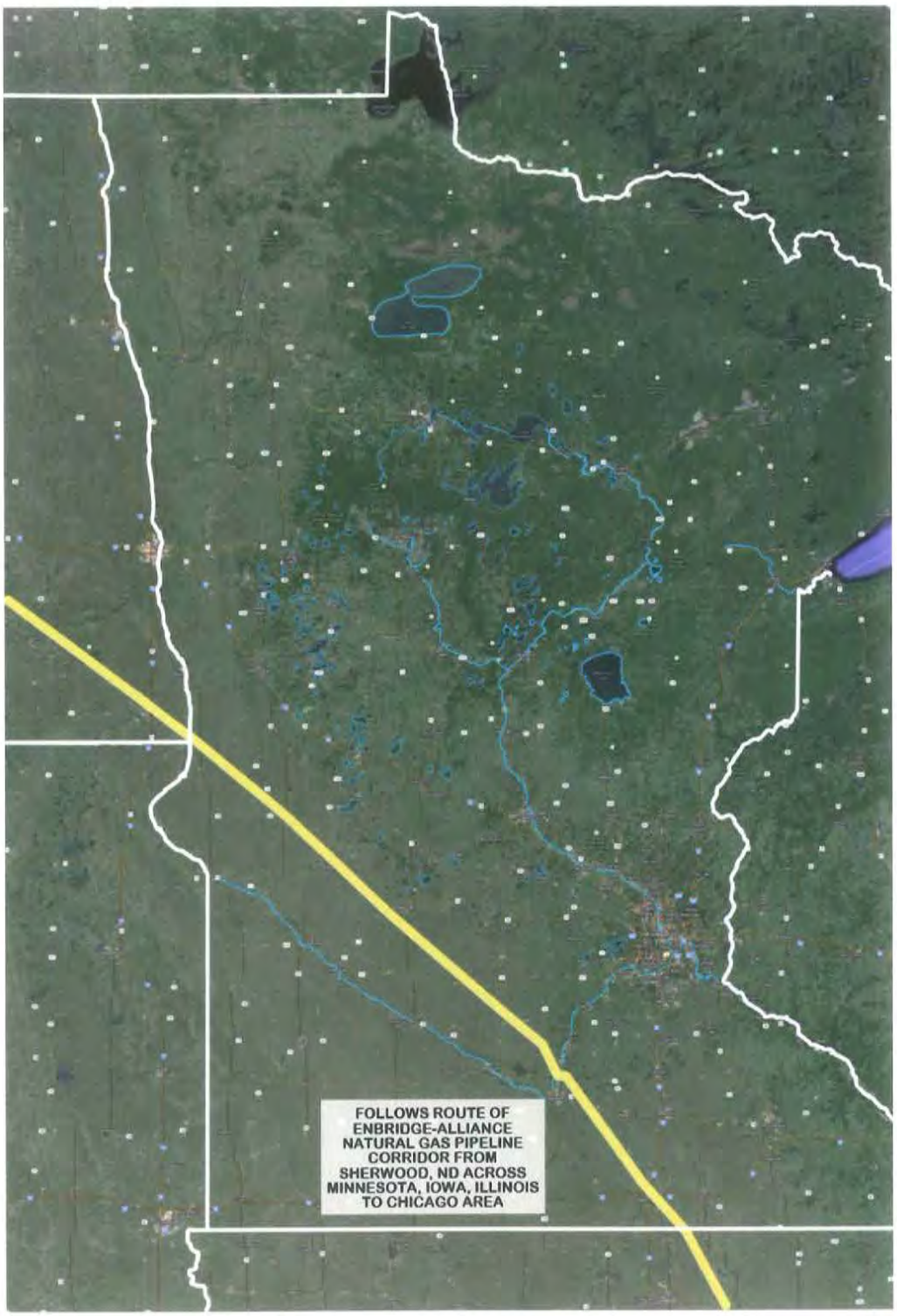
"No state action significantly affecting the quality of the environment shall beallowed, nor shall any permit for natural resources management and development be granted, where such action or permit has caused or is likely to cause pollution, impairment, or destruction of the air, water, land or other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

Since *Friends of the Headwaters* does not believe this proposed multiple pipeline "southern" corridor with the Sandpiper and now Line 3 rebuild can meet the high standards set above for quality, safety and sustainability of the lands and especially waters along the route, *Friends of the Headwaters* is proposing a "real" southern corridor for Sandpiper.

ALTERNATE ROUTE "A"

ALTERNATE ROUTE "A"

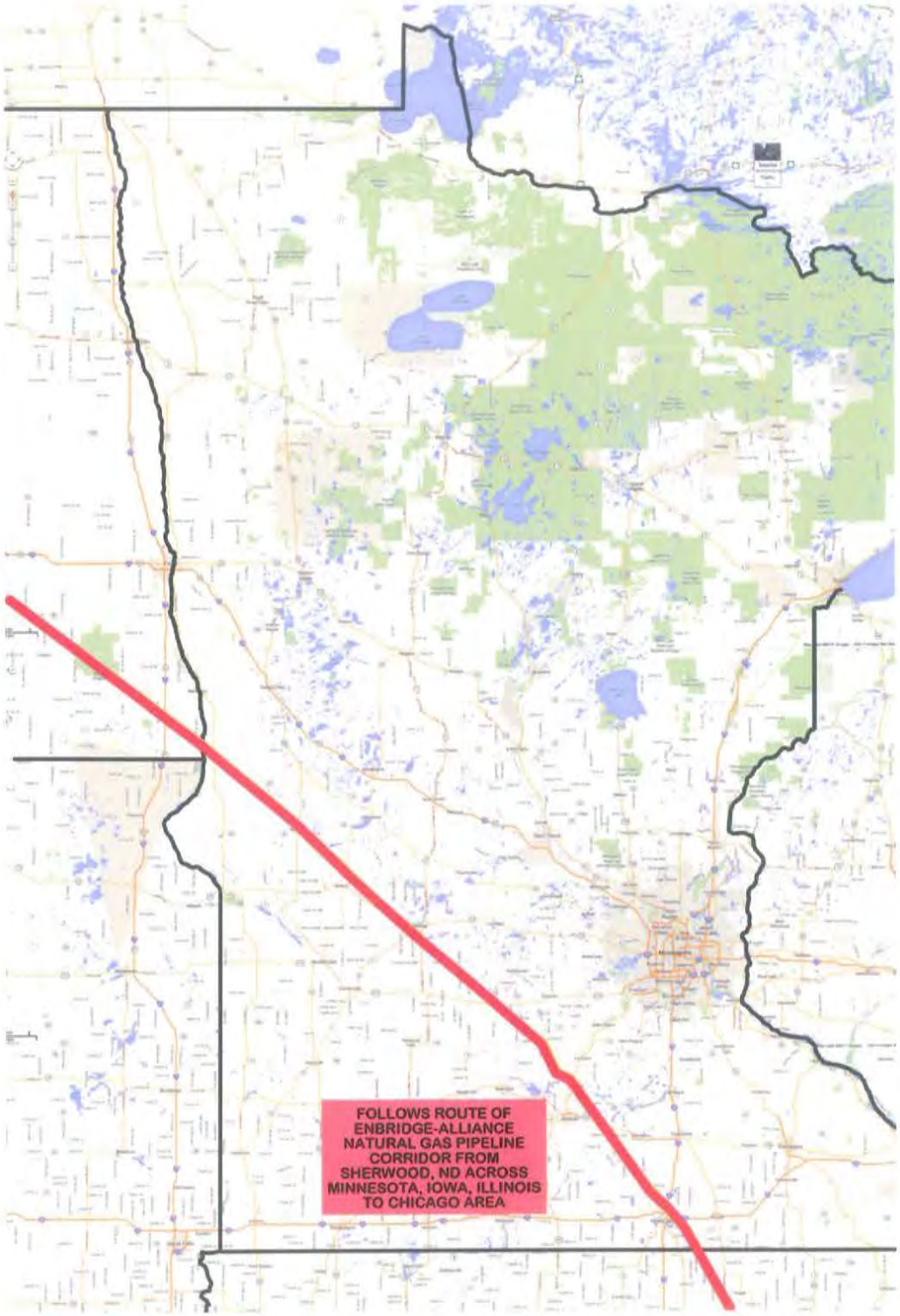
This ALTERNATE ROUTE A utilizes an existing energy corridor of which Enbridge is a 50% shareholder with Alliance Company of Canada. This corridor originates in Canada and ends west of the Chicago. The proposed Enbridge/NDPC pipeline route would intersect this corridor east of Minot, ND at which point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



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

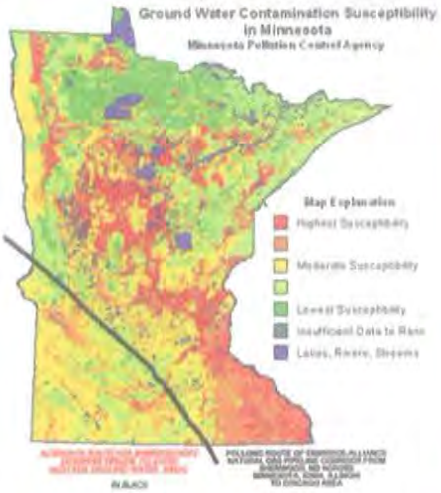
ALTERNATE ROUTE "A"

Note: Enbridge's Mark Curwin, Senior Director for Strategic Coordination of Major Project Executions in the US, stated their construction preference is to build pipelines across farmland. He made these remarks at a public meeting in Park Rapids on Jan. 29, 2014. In attendance were two Minnesota legislators, Roger Erickson and Rod Skoe,as well as local Hubbard County government, agency and business officials. Mr. Curwin gave the reasons of better soils, easier construction, easier access, less natural habitat destruction, cheaper and quicker. After construction the farmland can be put back into crop production. Access to leaks and spills is much easier. Winter wetland construction would be at a minimum.



ALTERNATE ROUTE "A"

ALT ROUTE A avoids all the major risk areas of the lake country: high quality lakes and streams, sensitive aquifers, culturally significant wild ricing waters, and valuable lakeshore and vacationland assets.



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

Although the route does not end in Superior, it still ties into the existing Enbridge system in Illinois with routing options to Michigan and Ontario that avoid our greatest freshwater lakes of Lake Superior and the Mackinac Straits of Lakes Michigan and Huron. The Illinois Hub also allows Enbridge access to its pipelines to Oklahoma and points south.

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

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

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

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

"Cherish the natural resources as a sacred heritage,
for your children and your children's children."
Teddy Roosevelt

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

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

May 29, 2014

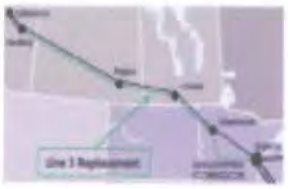
Prepared by
Richard Smith
Friends of the Headwaters
P.O. Box 583
Park Rapids, MN 56470

TO REVIEW:

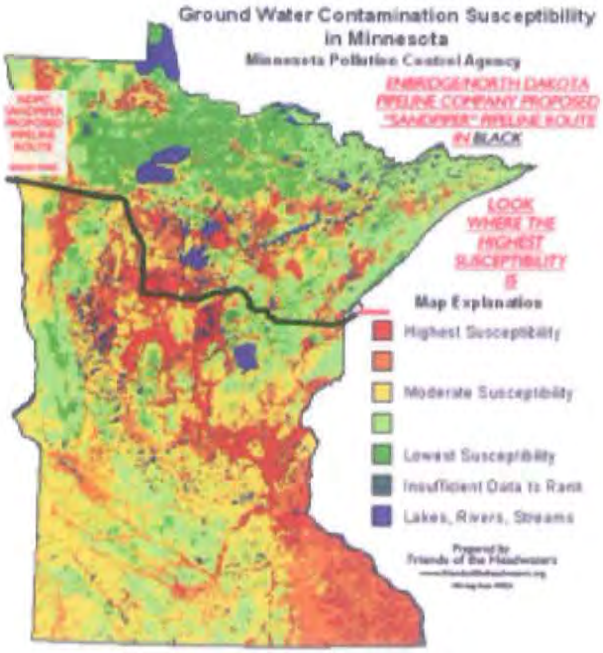
Friends of the Headwaters opposes the Enbridge/NDPC Sandpiper pipeline as currently projected to cross Minnesota's lake country from Grand Forks, ND to Superior, WI.

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

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



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

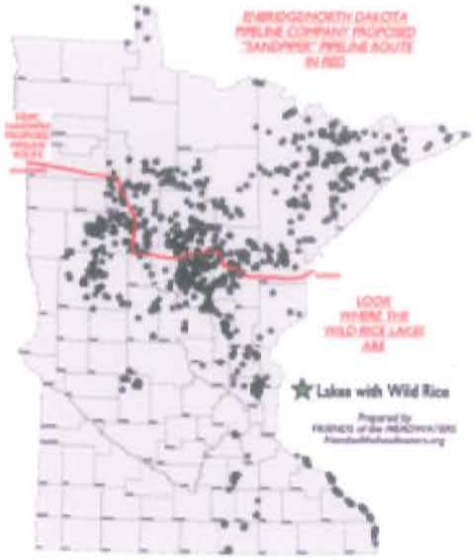


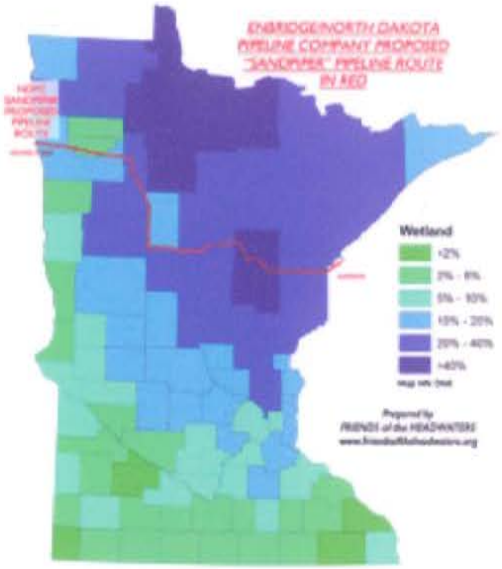
AT RISK: MINNESOTA'S

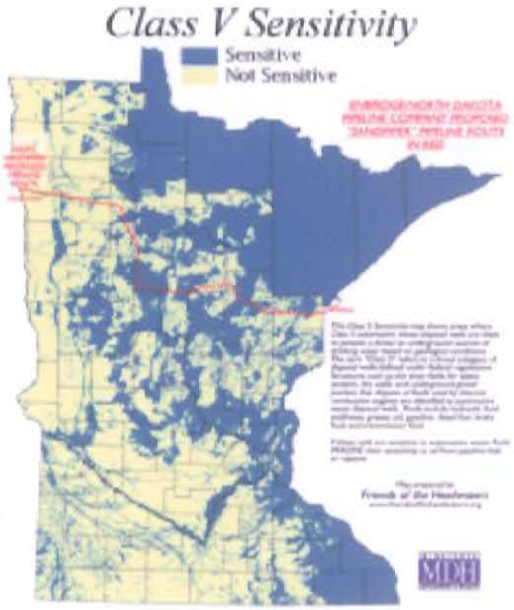
CLEAREST AND CLEANEST LAKES
GROUND WATER AQUIFERS
WILD RICE LAKES
WETLANDS
MOST SENSITIVE SOILS TO SPILLS
DIVERSITY OF VEGETATION
SENSITIVE ECOLOGICAL ZONES
THE LAKE SUPERIOR BASIN
HIGH VALUE RECREATIONAL AND RESIDENTIAL WATERS

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

ENBRIDGE/NDPC COULD NOT HAVE PICKED A WORSE ROUTE.







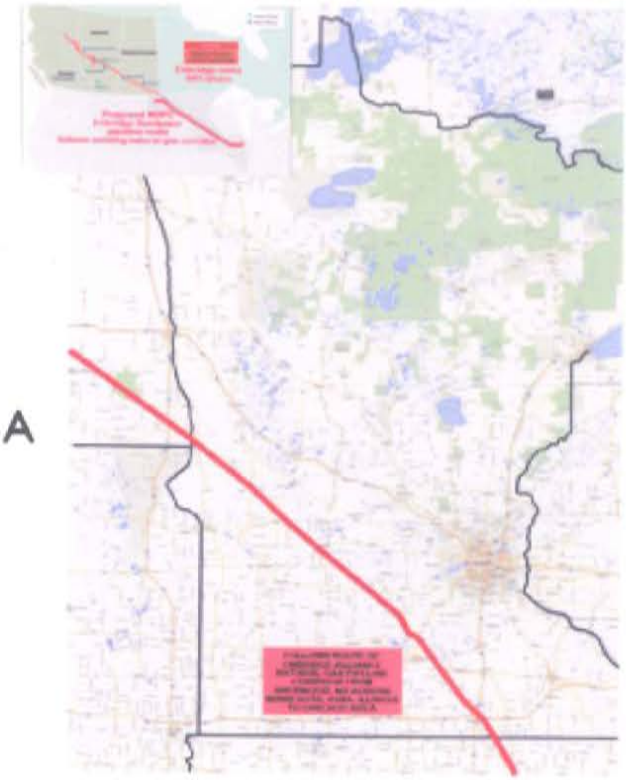
Given the high risk factors of Enbridge/NDPC's proposed Sandpiper 'southern corridor' route *FRIENDS of the HEADWATERS* has proposed a true 'southern corridor' across Minnesota which eliminates the potential for spills and damage to the state's most environmentally sensitive lands and waters.

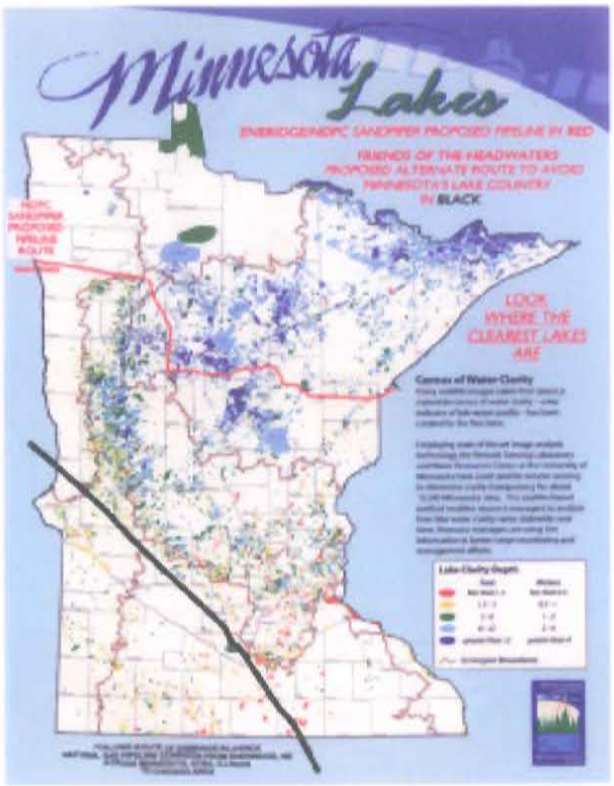
FRIENDS of the HEADWATERS Alternate Route A utilizes an existing energy corridor of which Enbridge is a 50% shareholder with Alliance Company of Canada. This corridor originates in Canada and ends west of Chicago. The proposed Enbridge/NDPC pipeline route would intersect this corridor east of Minot,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

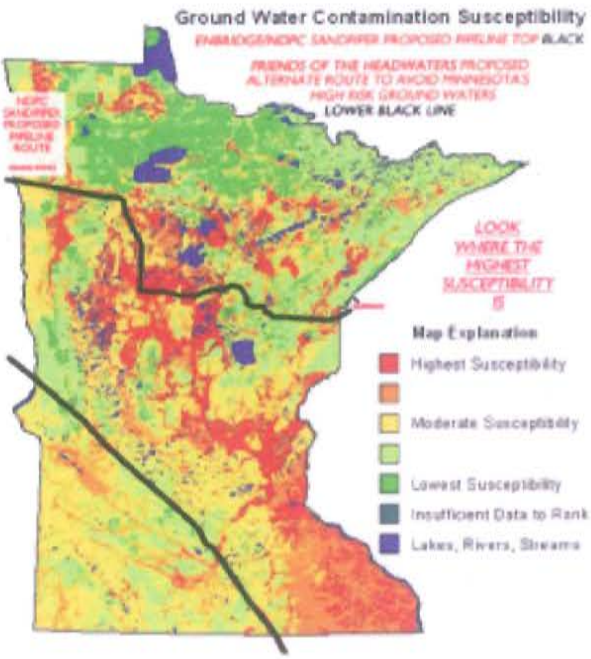
Alternate Route A below.

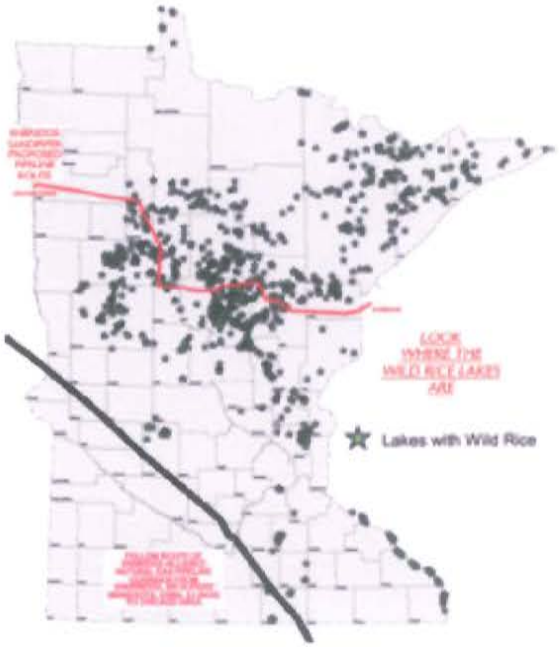
Compare the route risk factors in following maps.

A

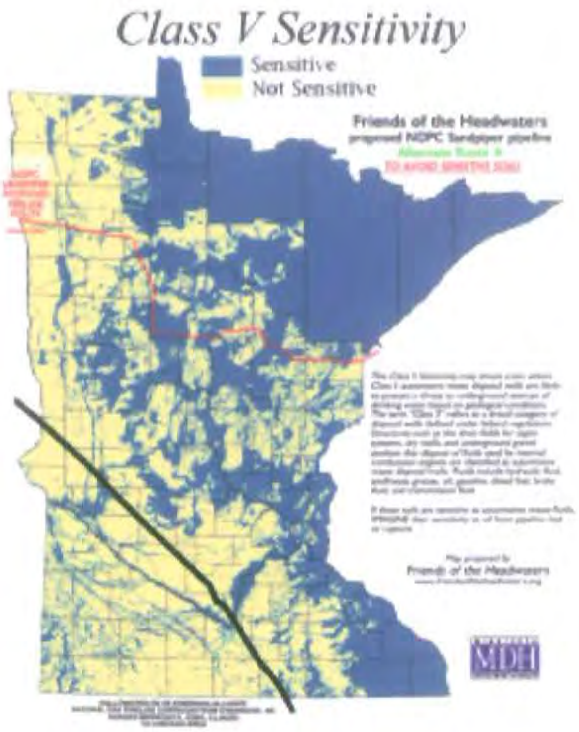


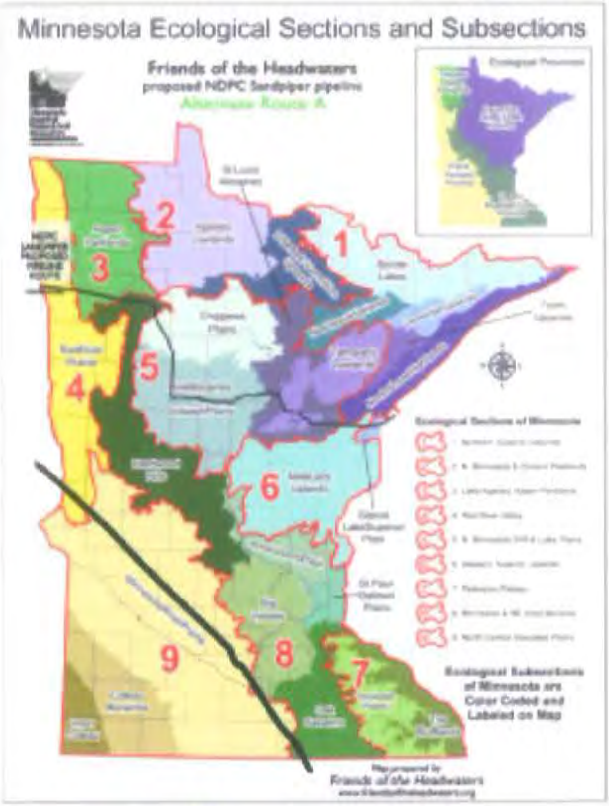


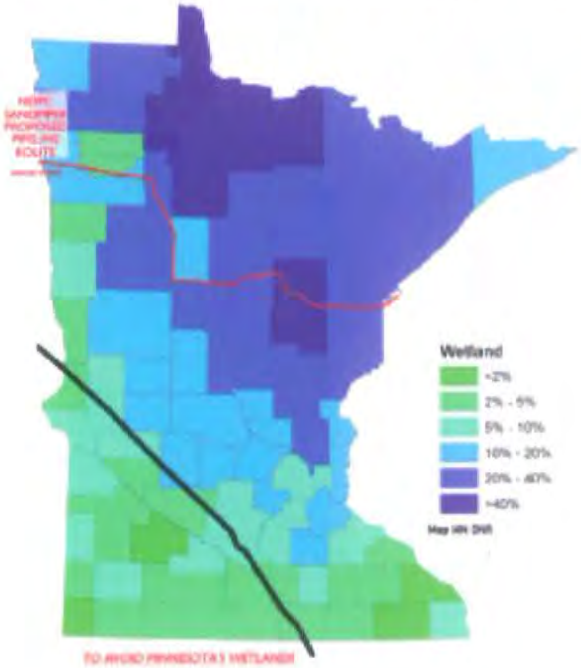




Route map comparisons continued:







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

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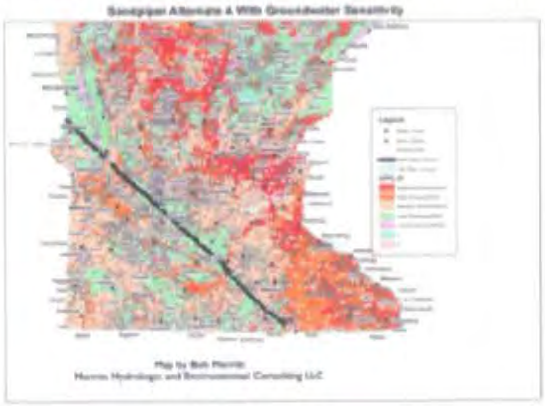
Two additional maps by Bob Merritt, hydrologist, showing Alternate Route A in better detail.



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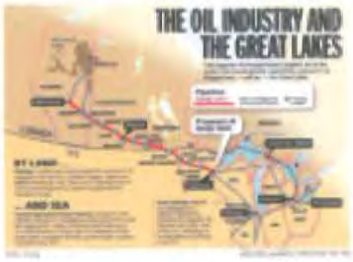
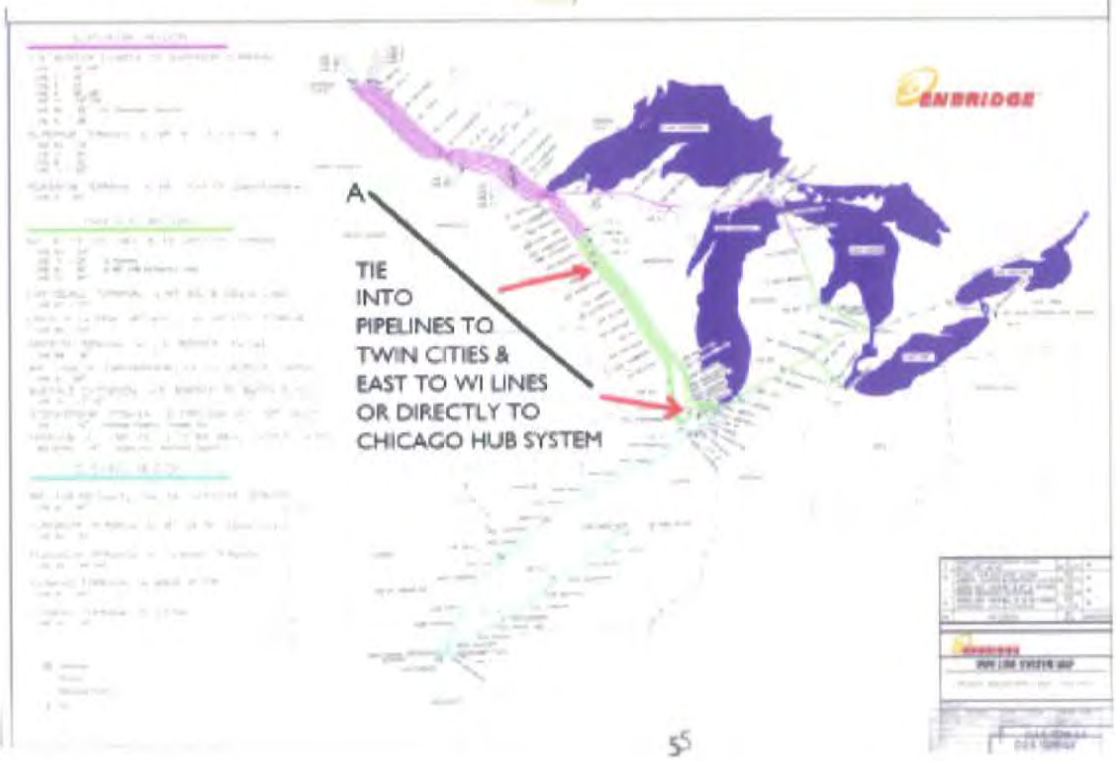


Since it's an existing corridor the company should have access to the mapping previously done for the pipeline already there. ALT ROUTE A also intersects pipelines in southern Minnesota owned and operated by other companies which provide the option of re-routing Bakken crude to the refineries in Rosemont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

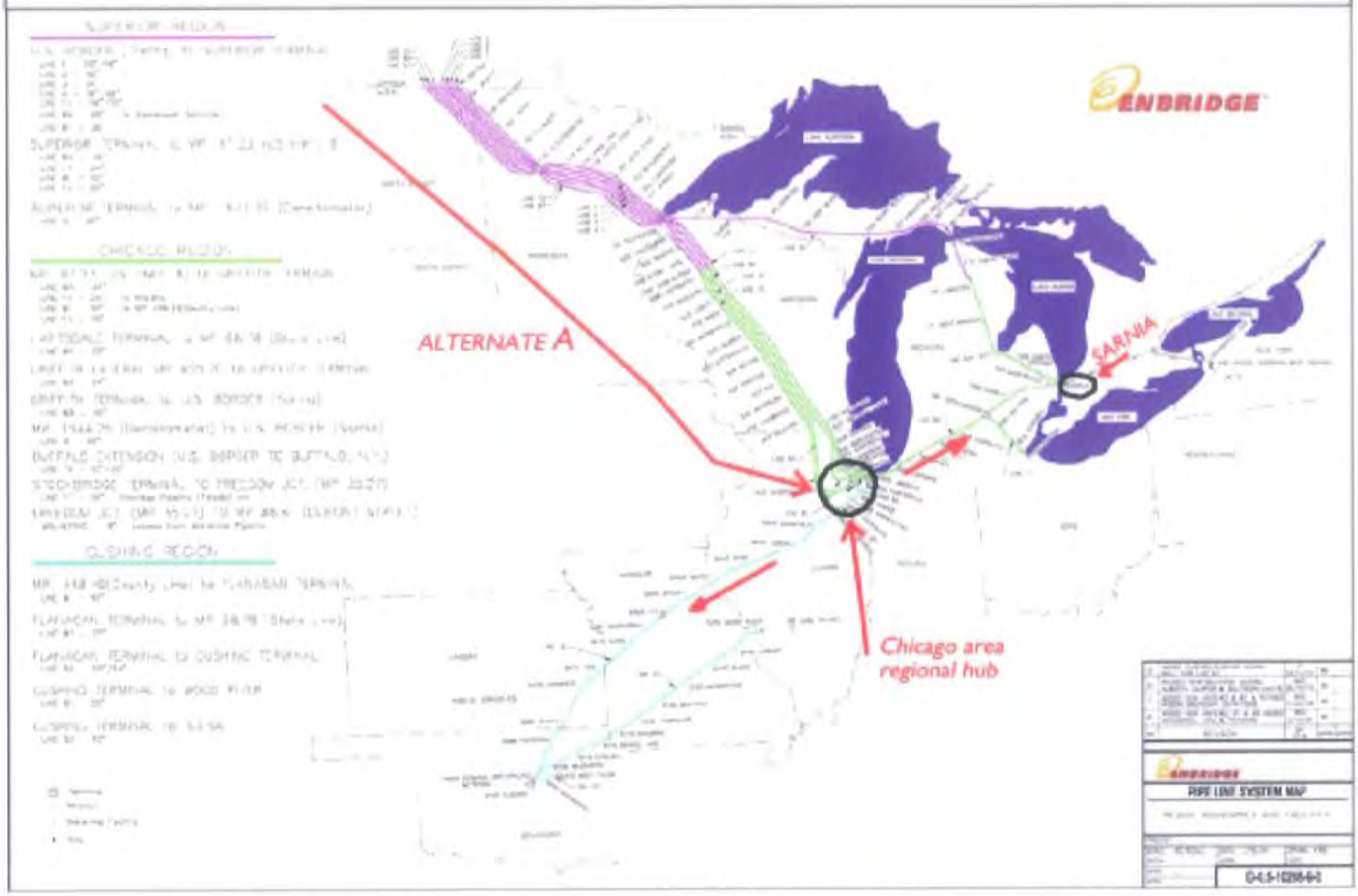
The Illinois Hub also allows Enbridge access to its pipelines to Oklahoma and points south.

Now Serving the Bakken



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

Figure 7853.0510-2
Pipeline System Map



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

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

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

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

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

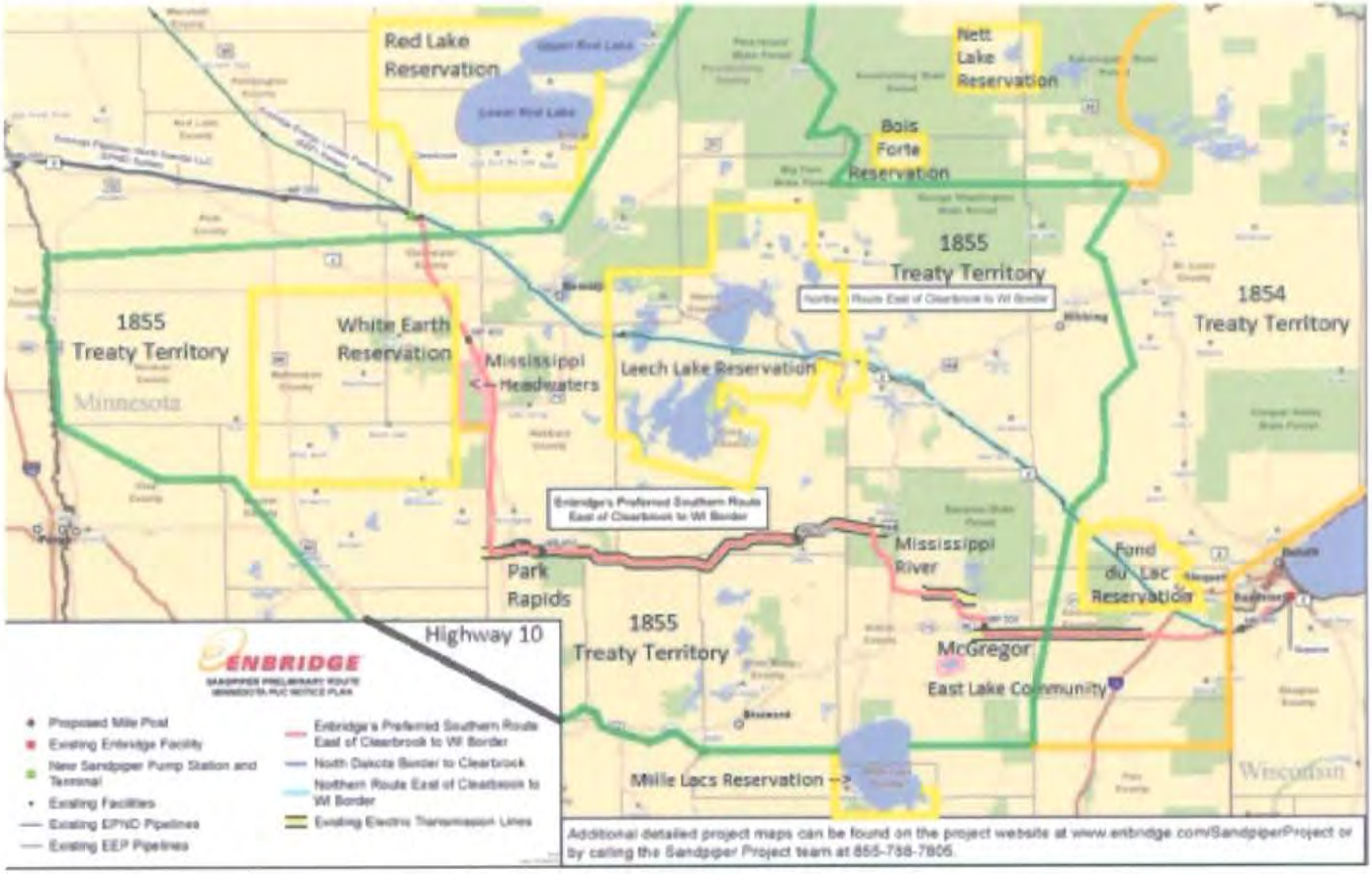
Costs should not be a factor. After all, once the Sandpiper is constructed, 375,000 barrels of oil will pass through it daily. At the current world price for a barrel of oil that amounts to $40 million dollars per day or $14.6 billion dollars annually. Even though Enbridge is charging a fee to move the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

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

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

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

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



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

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

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

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

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

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

From: James Gagne
To: *COMM_Pipeline Comments
Subject: Sandpiper
Date: Monday, April 18, 2016 11:06:35 AM

To whom it may concern,

It is was past time to approve this pipeline and let the company move forward with building it. It is just ridiculous how this has approval has gotten delayed by the left wing environmentalists. Pipelines are by far the safest way to transport oil and you all know it. We are going to have major oil spill one of these days because of all the oil that is being transported via trains it is dangerous and needs to be stopped.

Thanks,

James R. Gagne
2615 West Lafayette Road
Excelsior, MN 55331
612-709-5158
jgagne61@gmail.com

MINNESOTA DEPARTMENT OF COMMERCE

Comment Form: Scoping

Energy Environmental Review and Analysis

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

Name: Chuck Gayette Phone:

Street Address: 18400 165th ST. SW

City: Red Lake Falls MN State: ZIP: 56750

Email: chuckgayette@gmail.com

My comments pertain to:

- ☐ **Sandpiper Pipeline Project**
- ☐ **Line 3 Replacement Project**
- ☒ **Both Projects**

I am opposed to both projects. They are simply not needed. Enbridge Pipelines, most of them, are over 50 years old. Some are sitting above ground and corroding. The diligent care and maintenance of these existing pipelines is crucial and should be what gets needed attention.

Enbridge has a sordid history of leaks - over 800.

I live in the North and this land is good land. One-fifth of the world's fresh surface water supply lies here and it is worth protecting.

The Sandpiper line of fracked oil will cross ~~and facilitate~~ pristine ecosystems and facilitate the creation of a national sacrifice area in western North Dakota.

I have lived half of my 67 years in Minnesota - the home state of my mother. She grew up on the Iron Range. I was drawn to this state from my previous home in Michigan for the "Land of 10,000 lakes", its beauty and its diverse terrain. Now it too often is used as a playground of profit land to be abused driven by greed. It's crucial that sustainable energy sources - WIND, SOLAR get our attention

If including additional pages please number them and tell us how many you are providing: _____ pages

Please do not let these destructive projects proposed HAPPEN. Sincerely - Chuck Gayette

From:	Chad Gilbert
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 9:00:05 AM

Dear Ms. MacAlister,

I support the project its economical impacts are good for Minnesota and the US.
Enbridge has agreed to use skilled trained labor which ensures a quality built project using local Minnisota Middle Class Families.
Please approve this job creator and environmental friendly project as quickly as possible and put Minnisota families to work.

Sincerely,

Chad Gilbert
36013 Road 33
Mancos, CO 81328
chad798@yahoo.com

MINNESOTA DEPARTMENT OF COMMERCE

Comment Form: Scoping
Energy Environmental Review and Analysis

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

Name: Harvey Goodsky Jr. Phone: 218·392·0615

Street Address:

City: McGregor State: MN ZIP: 55760

Email:

My comments pertain to:

- ☒ **Sandpiper Pipeline Project**
- ☐ **Line 3 Replacement Project**
- ☐ **Both Projects**

Congress shall have the power to regulate commerce with foreign nations among the several states and with the anishinaabeg

Article #1
section #8
United States Constitution!

If including additional pages please number them and tell us how many you are providing: _____ pages

From:	Bud Stone - Grand Rapids Area Chamber of Commerce
To:	*COMM_Pipeline Comments
Cc:	"Byers, Jennifer"; Patrick Hughley; "Becky LaPlant"; mike@weberjohnsonpa.com; Loren Solberg; "Wayne Roskos"
Subject:	Scoping EIS comments for Sandpiper (13-473 & 13-474) and Line 3 Replacement Projects
Date:	Tuesday, May 24, 2016 3:05:51 PM

Jamie MacAlister
MN Dept. of Commerce
85 7th Place East, Suite 500
St. Paul, MN 55101

The Grand Rapids Area Chamber of Commerce, with a dues paying membership of more than 550 businesses and individuals, has long been a firm supporter of the Enbridge Energy proposed Sandpiper and Line 3 Replacement pipeline projects. As has been proven time and again, it is safer and more economical to transport crude oil by pipeline than by truck or rail. That alone is reason enough reason to work with Enbridge to remove barriers that would delay the Sandpiper Project or the replacement of Line 3. At the present time we are pleased that the scoping process for these two projects is moving forward and we strongly encourage the MN Dept. Of Commerce and the MN PUC to continue to support a consistent and timely regulatory process and complete the evaluation of these two projects within the 280 day time limit that has been provided. Too many times we have seen un-warranted delaying tactics jeopardize projects that would provide jobs and economic stability to our State. We hope that the Dept. of Commerce and the PUC will remain alert and take the positive steps to ensure the scoping process for these two projects takes place in a manner that continues to move these projects forward in a fair and non-partisan way.

Best Regards,

Bud Stone, President

Bud Stone - President
Grand Rapids Area Chamber of Commerce
One NW Third Street
Grand Rapids MN 55744
bud@grandmn.com
218-326-6619
1-800-472-6366 Toll free
www.grandmn.com
www.facebook.com/grchambermn

From:	Sr. Bryan Greene, First
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 9:00:12 AM

Dear Ms. MacAlister,

Enbridge has been doing this for almost 70 years, they have the skills, the knowledge and the technology to provide a pipeline route that has the least amount of environmental impact. We need projects like this to help local economies with tax revenue and trickle down. The country needs these projects to become energy independent. Oil won't last forever but so many things rely on it and until it is depleted, which won't happen for another 150 years, we're still going to need pipelines like these to transport crude

Sincerely,

Bryan Greene
8220 S Marshall Ct
Littleton, CO 80128

From: Cedrik Gustafson
To: *COMM_Pipeline Comments
Subject: Sandpiper and L-3 projects!
Date: Tuesday, May 10, 2016 7:04:50 PM

To the PUC and department of Commerce,

I desperately urge you to pass the Sandpiper and Line 3 replacement projects. I have lived next to the Enbridge Terminal in Clearbrook for 36 years, not once have we ever had a concern or anxiety for the pipeline. I also work as a contractor for Enbridge doing a variety of work from constructing new pump stations to doing "Integrity" digs and maintenance work. The company I work for was recently awarded contracts for the Sandpiper stations in North Dakota and Minnesota, but have been put on hold because of permit issues. Enbridge means a lot to our community and employ's a lot of pipeliners in the area. It's not just the employee like myself that suffer from immeasurable delays, but our small businesses, our local mom and pa shops, and most importantly our families. Please take this into consideration when making your decision.

Thanks!

Cedrik Gustafson,

Sent from my iPhone

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