

Levi, Andrew (COMM)

From: katie capistrant <kannxc@gmail.com>
Sent: Saturday, June 17, 2017 1:40 PM
To: MN_COMM_Pipeline Comments
Subject: DEIS comment

Docket # CN-K1-916 and PPL-15-137

Hello, I am a resident of Minnesota, born and raised and I want my voice to be heard about this proposed new line 3 pipeline.

My first issue is the impact it would have on wild rice lakes. In figure ES-10 of the DEIS there shows that the proposed route would go through 17 (much more than any alternative route) wild rice lakes as well as through sensitive wetland area rich in bio diversity. I personally supplement my food supply for the year with wild rice that i harvest in Minnesota as well as enjoy the process of being out on the lakes each year. While I enjoy being in the outdoors and love to eat wild rice, I acknowledge that this is more than just a hobby for indigenous folks who have been living on this land for thousands of years. It is a crucial part of their way of life culturally, as well as being a source of economic income and a source of healthy food for folks who often have health problems because of the inequity that continues to be done to them, poverty and inaccessibility to healthy food. The new pipeline would be extremely detrimental to important habitat for wild rice, medicines on the land, other wild food and fish native and non native folks rely on, not to mention the detrimental effect it could have long term. In chapter 9 the DEIS states that line 3 "would have a long-term detrimental effect on tribal members and tribal resources." This statement clearly shows that Enbridge does not care about the impact it would have on the tribal people. For one because Enbridge never bothered to consult them about this pipeline, secondly because in chapter 11 Enbridge states that the negative health impacts, though an act of structural racism on a group of people already under stress and inequity, are not a reason to deny the project. Because Enbridge does not care about the impacts this would have on indigenous peoples and non native residents of Minnesota it is up to us and the state of Minnesota to regulate this company and protect our land and water.

There are also many other concerns I have with this project especially concerning Enbridge's hope to abandon the existing line 3 as well as many missing details in the DEIS that need to be addressed. For one the DEIS does not contain a spill analysis for tributaries of the St. Louis River and the Namadji River where spills could gravely impact Lake Superior.

Enbridge proposes abandoning the existing line 3 without clean-up. This would cause the pipe to eventually rise up to surface level, deteriorate and lower property taxes (8.3.1). Also the estimated cost to clean up is huge. If it is so costly that it is deemed unfeasible to clean up, why should it be left to local landowners, the state of Minnesota, and future generations to foot the bill? Whether it be cost of clean up, lower property values, death to natural resources, displacement of people and animals, or the long term effects of climate change, why is it left on our shoulders to deal with the mess that this corporation is making? Are they planning to abandon the other pipelines along the corridor as well? What about the new line 3 in 60 years? Does the government of Minnesota represent an oil company or the people who reside here?

The DEIS also states (8.3.1.1.1) That they plan to "identify, manage and mitigate historically contaminated soils and waters found during the abandonment or removal of the existing line 3." Where is this detailed plan? I would like to see this in writing as a contract as opposed to an empty promise.

Also There are currently government subsidies going to the fossil fuel industry, though the demand is dropping. The impact on the environment from extracting, refining and eventually burning fossil fuels from fracking due to greenhouse gases is incredible and should be enough for the state of Mn to question whether or not it's time to get on the right track and fund alternative energies. Alternative energies would also be great for creating jobs in MN, something that supporters of this project claim would happen with line 3 construction. If Minnesota wants

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to comply with terms of the Paris climate agreement, then further support of the fossil fuel industry should be out of the question.

One of the main arguments for the pipeline construction is creating jobs. wouldn't clean up of the existing pipeline before new construction create even more jobs? In the DEIS (5.3.4) Enbridge states that the company will use exiting employees to operate the new line 3 cited "all workers would re-locate to the area." This means no new permanant jobs for residents of Minneasota. 0288-2

Page 18 goes on to show the estimated costs to remedy the effects this new project would have on climate change, both from emissions of refining the oil and the burning of the fuel. I ask the legislators of Minnesota who are supposed to be representing me and the other residents of Mn, to demand a more thorough EIS, to demand clean up of the existing Line 3, to respect the Indigenous Nations voices and rights, and to respect the water and future of our natural resources. I want to see these fossil fuels left in the ground and for funding and government support to go to a more viable long term source of energy.

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MS. JACI CHRISTENSON: Jaci

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Christenson, J-A-C-I, C-H-R-I-S-T-E-N-S-O-N.

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My comments first of all, to the next generation, I am going to fight until the last day I have on this earth for you.

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Today I address the concerns of horizontal directional drilling, otherwise known as HDD. It's kind of a mouthful. I had no idea what this was until I started delving into the impacts on our Minnesota rivers with regards to this line.

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It is used to cross pipelines under rivers.

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According to the DEIS, HDD would

1 be the method of choice in many rivers in this
2 preferred Line 3 route, including two of our
3 wild rice waters, Hay Creek and Shell River.
4 This is from Chapter 5, page 49.

5 So what is this HDD, which I sat
6 shaking my head as I was reading the DEIS.
7 Well, here's a direct quote from the DEIS:
8 Chapter 5, page 71, "During drilling, fluid
9 which comprises water, bentonite clay, and
10 possible Minnesota PCA-approved additives, is
11 circulated through the drilling pipe to
12 lubricate the drill bit, remove drill cuttings,
13 and stabilize the open hole.

14 "The potential exists for an
15 inadvertent release or frac-out of this
16 drilling fluid to occur when pressurization of
17 the drill hole is beyond the containment
18 capability of the overburdened soil material,
19 which would allow this drilling fluid to flow
20 to the ground or river bed surface.

21 "Although bentonite clay is
22 nontoxic, drilling mud can smother aquatic
23 wildlife and increase turbidity in affected
24 surface waters. Additives may be mixed with
25 the fluids, mud for viscosity for lubricating

1 reasons."

2 There is no gentle way for me to
3 say this? For me, HDD rapes our earth, and
4 when our earth tries to reclaim itself, it is
5 choked with drilling mud.

6 Is this honestly our best? At
7 the very least, this DEIS must disclose these
8 additives and their effects on our ecosystem.

9 HDD will be used under some of
10 our most pristine, most sensitive waters and
11 anywhere there's flowing moving water. That's
12 from chapter 5, page 712.

13 Guess what? That description
14 comprises pretty much all of the water in this
15 preferred route of Line 3.

16 "Specifically regarding those
17 wild rice waters of Hay Creek and Shell River,"
18 the DEIS states, "if HDD frac-out," this is a
19 direct quote, "introduction of contaminants,
20 introduction of invasive aquatic plants and
21 non-native strains of wild rice and altered
22 lakebed conditions occur as a result of the
23 construction, impacts would be major."

24 We cannot approve a route that
25 comes with a major risk of taking wild rice

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1 from its people. I wasn't around when we
2 killed the bison, but I am not going to stand
3 back and watch us kill wild rice, too.

4 I was able to find an additional
5 source cite in the DEIS footnotes regarding
6 frac-out impacts. This comes from the
7 Interstate Natural Gas Association of America.
8 I have the website documented here.

9 "Additionally, the effects of HDD
10 crossing construction have not been well
11 studied. A better understanding of potential
12 environmental impacts from HDD crossings is
13 required for balanced evaluation crossing
14 techniques and their application to specific
15 water crossings."

16 We do not even have the
17 information to proceed with this project.

18 By Enbridge's own admission, from
19 the Enbridge Drilling Mud Containment, Response
20 and Notification Plan, chapter 4.3, page 3,
21 direct quote, "Containment is not feasible for
22 in-stream releases."

23 HDD will be used rather
24 extensively on Line 3, so how often can we
25 expect a failed HDD or a frac-out under our

1 rivers?

2 Well, like much of this DEIS, the
3 answer to these serious questions is, "It can
4 be difficult to predict." That is the direct
5 quote from this DEIS.

6 I do not accept that, and I know
7 we can do better than this. We are brilliant.
8 This is a cop-out. I was able to find one case
9 study cited in the DEIS regarding the frequency
10 of these frac-outs.

11 This is from Slade 2000,
12 Stockbridge to Freedom Junction, Michigan, on
13 the Enbridge line. Direct quote from the DEIS
14 5.2.1.2.4, Chapter 5, page 73, "It can be
15 difficult to predict the probability of an
16 occurrence. Longer crossings and HDDs passing
17 through glacial tills, boulders, and gravels
18 have a higher risk of failure.

19 "Slade 2000 studied a pipeline
20 construction project from Stockbridge to
21 Freedom Junction, Michigan. This was a
22 35-mile, 16-inch crude petroleum pipeline using
23 11 HDDs to cross through wetlands, streams, and
24 state recreational areas.

25 "Results determined multiple

1 relatively minor releases regarding less
2 cleanup and two major frac-outs, resulting in
3 significant volume, location, and ecology
4 issues."

5 35 miles, 11 crossings, multiple
6 minor releases and two major frac-outs? Line 3
7 will cross flowing water, rivers, streams,
8 creeks, brooks, more than 80 times over this
9 337 miles.

10 How many major frac-outs should
11 we expect? If we use the case study, one major
12 frac-out for every 5.5 river crossings.

13 And concluding, after spending
14 three weeks, basically every spare moment that
15 I had, trying to pour over this DEIS and how it
16 will impact our rivers -- which, by the way,
17 for the record, this process is very unfair to
18 the public.

19 Really, the core component
20 missing here is, and throughout this whole
21 DEIS, is morality. We have a lesson to learn
22 from our native communities. They live with
23 morality and they know how to relate to our
24 earth and one another.

25 Let's follow their lead.

1 MR. CURTIS COBB: I'm Curtis
2 Cobb. My concern -- I have two concerns. One
3 is --

4 FACILITATOR: Curtis, could you
5 just spell your last name for the record.

6 MR. CURTIS COBB: Cobb, C-O-B-B,
7 like corn on the cob, two Bs.

8 The pipeline is meeting federal
9 standards for thickness and strength. As an
10 engineer, I am always concerned with is that
11 enough?

12 Most civil engineers, when they
13 design structures in this country, they
14 actually multiply the stress, and they triple
15 it to make sure bridges and structures in this
16 country are strong enough.

17 My question is, is this pipeline
18 really going to be strong enough to withstand
19 some of the stresses that the earth and the
20 environment and the fluid itself puts on this
21 pipeline?

22 I understand that the pressure
23 in this pipeline is over a thousand pounds a
24 square inch. That's quite a bit. While
25 that's a normal pressure, steel always has its

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1 weaknesses.

2 So that's my concern, is, number
3 one, is the pipeline strong enough?

4 As far as the environment goes,
5 pipelines are the most efficient and safest
6 way to transport most fluids. We have a huge
7 number of pipelines in this country and they
8 all do pretty well. That doesn't mean they
9 don't break, but it's pretty good.

10 Issue number one, is the
11 pipeline strong enough.

12 My other concern is the -- this
13 pipeline aids and abets one of the biggest
14 environmental disasters going on in this
15 earth, and that is the processing of the oil
16 sands in Canada.

17 A Canadian friend of mine did a
18 six-month study of what was going on up there.
19 And what happens is as they process these oil
20 sands, there's always a toxic residual. That
21 toxic residual just gets put into ponds.

22 Those ponds now cover 176 square
23 kilometers. That's about 100 square miles of
24 poisonous fluid ponds.

25 If a bird lands in the pond,

1 it's instant death.

2 These ponds are between 30 and
3 100 feet deep. They are designed to leak this
4 poison into the ground, which they are doing
5 at about 1 percent per year. It is poisoning
6 square miles, thousands of square miles of
7 groundwater in Canada.

8 We do not need this oil. It is
9 all there to take advantage of a relatively,
10 you might say, unusual form of oil residual.

11 The -- there's been a huge
12 amount of money spent in doing this. I think
13 there's been over \$11 billion spent on
14 building oil refineries there. It employs
15 about 50 or 60 thousand people.

16 So this pipeline really aids and
17 abets that environmental disaster.

18 So I have no objection to the
19 pipeline, just what it serves.
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MR. MARTY COBENAIS: Marty

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Cobenais, last name is C-O-B-E-N-A-I-S. I am

1 with the North Star chapter of the Sierra
2 Club. I'm an executive committee member. I'm
3 also a soil and water conservation supervisor
4 here throughout the county.

5 So this is kind of to you guys.
6 The first question, are you guys willing to
7 have a new pipeline go through your property,
8 have it abandoned, and left in your backyard?
9 That's basically what you guys are asking of
10 us to have done. So are you willing to do
11 that yourselves?

12 I'll get back to that question.
13 That will be my final one.

14 Oil consumption in the USA is
15 down 18 percent level past -- since 2009. The
16 main reasons -- fuel efficient cars, people
17 driving less, airlines flying less. And yes,
18 we still need oil. We all came here today in
19 clothes. We still need oil. Thank God we
20 still have oil, otherwise we'd all be sitting
21 here naked.

22 Way back in the beginning, Harry
23 Ford -- Henry Ford had an option between two
24 fuels in his automobiles. First, crude oil,
25 the second was hemp oil. Hemp oil -- yes, I

1 said hemp oil, a renewable. So would we
2 really be here in 2017, if we had hemp oil as
3 our main fuel?

4 We wouldn't be. We wouldn't be
5 having this conversation about pipelines, and
6 it would be safe to fall on railroads and
7 everything else, and it's renewable. Once
8 again, it's renewable. Not like this stuff.
9 We are getting off of this stuff because we're
10 running out of it.

11 And we probably wouldn't have
12 Enbridge. Some of us would probably be happy
13 with that.

14 Speaking of Enbridge, they say
15 that they need this pipeline to bring oil to
16 us. But remember that in 2008, they also said
17 they need the Alberta Clipper. And nine
18 months before they started the Alberta
19 Clipper, the oil companies said, "We don't
20 need that. We actually told you not to build
21 it." They tried to get Enbridge not to build
22 Alberta Clipper.

23 Last year, we just had the
24 Sandpiper, and due to different regulations
25 and everything else, they said, "Well, we

1 don't need the Sandpiper now, either. We're
2 going to throw that away and we're going to go
3 invest in Dakota Access over in North Dakota."
4 So do they really need this pipeline?

5 Those are two questions for the
6 DEIS. Enbridge states that they remain
7 committed to the environment. In both the
8 Bemidji and Duluth papers, Barry Simonson, the
9 project director, stated that they anticipate
10 over 6,000 integrity digs in the next 15 years
11 for just Line 3 alone, so it's in their best
12 interest to just replace it and abandon it in
13 the pipeline corridor.

14 So if you already have over
15 6,000 integrity digs planned, is it really in
16 the best interest to not have -- it's just
17 going to make an environmental nightmare. If
18 you already say that it has rust and cracks
19 and everything else in it, to just leave it in
20 the ground? That doesn't make sense.

21 I also got to hear Barry on the
22 radio station the other day, and he states
23 that the pipes would be capped, purged, and
24 filled with nitrogen. It also says that in
25 the draft EIS.

1 However, there would be no
2 electronic monitoring like you do in current
3 pipelines for pressure loss, but they would
4 fly the route for leaks.

5 This is interesting now.
6 Considering that they're going to fill it with
7 nitrogen and they have to fly the routes
8 anyways to monitor it if there's any other
9 leaks, how do you know when nitrogen is in the
10 air?

11 You guys look like farmers. Do
12 you know nitrogen -- when you put nitrogen out
13 on your field, do you see it? More of a gas.
14 You don't see it, so you're not going to see
15 if there's a nitrogen leak.

16 Thus, remember that all
17 pipelines leak. Tar sand is also the fuel
18 efficient -- the worst fuel efficiency. It
19 takes six barrels of water to make one barrel
20 of oil, which then they dilute to put
21 chemicals in to make it go through the lines.

22 So it's probably only about four
23 gallons to make that -- or four barrels to
24 make that half a barrel, just to go through
25 the lines.

1 One of the other things that
2 they talked about is that they're going to use
3 dams and stuff like that on different rivers
4 and different spots along the route to divert
5 the water around different areas.

6 And yet they say that they're
7 environmentally friendly, but I don't know any
8 of us that can really replace a river as is.
9 So if you're going to divert on the river so
10 you can dig a trench in it, you're not going
11 to replace it as it is.

12 So I guess I would tell them
13 that they need to directionally go underneath
14 all waterways, not just the ones they feel are
15 important like the Mississippi and stuff like
16 that, but that they need to go underneath all,
17 and in the depth of up to at least 15 to
18 20 feet, triple wall it, make it efficient.

19 The other part that they also
20 talk about is that when they go through
21 swamps, they like to bury it, the buoyancy
22 part of it. What they did with Alberta
23 Clipper is they put four inches of concrete
24 around it when they went through the swamps to
25 keep it weighted down.

1 And that's a lot of concrete,
2 because we have lots of swamps up here.

3 The interesting part -- and I
4 know I'm running over my time -- is that it's
5 funny that we have the Minnesota Pollution
6 Control Agency here, because I have one of
7 their pages here about temporary and permanent
8 closure of underground storage tanks.

9 After five years, a gas station
10 that is closed is required to remove their
11 tank or fill it full of inanimate objects. So
12 concrete or fill it full of dirt, and fill it
13 in, or they're supposed to remove all their
14 pipes, their tanks, and everything else.

15 Earlier I said they're going to
16 cap the end of these pipes. It's going to
17 make basically a tank for them or tanks
18 underneath there. So it doesn't make any
19 sense not to also make them -- require them to
20 remove these pipelines. It's going to do the
21 same damage.

22 Finally, there's going to be
23 some talk about jobs, tax money, and I'm sure
24 today or even some of these booths are talking
25 about jobs and stuff, and I know in the EIS it

1 does.

2 Currently Enbridge is in the
3 Minnesota tax court system asking for money
4 back; says the State overtaxed them. In
5 Clearwater County alone, they're asking for
6 over \$7 million from Clearwater County -- that
7 says Clearwater County has to repay them.

8 I know there's some different
9 opinions out there and saying that -- they're
10 trying to get the State to say they're going
11 to pay it back, but in the end, it's going to
12 end up hurting all of us.

13 So basically what I'm asking is
14 to not allow this pipeline, that I think this
15 pipeline should not go through anywhere, as do
16 some of the tribes in the area. I believe Joe
17 Palmer has already sent that to you guys,
18 resolutions from tribes.

19 So what they should do is turn
20 off Line 3, as it is a safety hazard, and
21 remove it from the ground permanently.

22 So at the end, again, I ask, are
23 you guys willing to have this pipeline go
24 through your backyard or leave a pipeline in
25 your backyard? Thank you.

Levi, Andrew (COMM)

From: nccwisdom@gmail.com on behalf of Nancy Cosgriff <nancy@thirdagepartners.net>
Sent: Sunday, July 02, 2017 12:51 PM
To: MN_COMM_Pipeline Comments
Subject: Enbridge Line 3 Pipeline

Dear MN Department of Commerce I find the Enbridge Line 3 DEIS to be unacceptable! We must not let our earth and river's be damaged for the sake of business' efficiency and profit! See below for just several reasons why we must say NO to Enbridge Line 3!

Re: dockett numbers CN-14-916 and PPL-15-137

1. DEIS Chapter 5.2.1.2.4

Horizontal Directional Drilling (HDD) will be used to cross under our most pristine, most sensitive waters, and anywhere there is flowing water, which describes most of the route. The potential exists for contamination through release of drilling fluid to the ground and/or water, termed a "frac-out." The DEIS cites a 35 mile section of Enbridge pipeline in Michigan where there were 11 HDD crossings, multiple minor releases and 2 major frac-outs. MN will not accept the risk of a frac-out every 5.5 river crossings.

0996-1

2. DEIS Chapter 10.2.4.1.1

"The annual probability of a spill incident for the Applicant's preferred route was estimated as 0.249 incidents per year with a recurrence interval of 4.0 years."

0996-2

Every year there would be a 25% risk of an oil spill, which means a risk of one spill every four years. We should not accept this high risk probability.

Risk from Line 3 is in conflict with several of our Minnesota Statutes:

1. MN Statute 103F.305 Scenic River Protection Policy

<https://www.revisor.mn.gov/statutes/?id=103F.305>

2. MN Statute 116D.02 Declaration of State Environmental Policy

<https://www.revisor.mn.gov/statutes/?id=116d.02>

Thank you for reading and revising the DEIS!

--

Nancy Cosgriff D.Min.

Facilitator ~ Spiritual Guide ~ Life Coach

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"Mindfulness is loving all the details of our lives." Pema Chodron

Levi, Andrew (COMM)

From: Kyle R. Crocker <kcrocker@paulbunyan.net>
Sent: Friday, July 07, 2017 1:37 PM
To: MN_COMM_Pipeline Comments
Cc: Kyle R. Crocker
Subject: Comment of the Line 3 Project Draft EIS

Members of the Commission,

I have reviewed select portions (including appendices) of the Draft EIS for the proposed Enbridge Line 3 Project: docket numbers CN-14-916 and PPL-15-137. I would like to file this substantial comment on the document. I am very familiar with many of the issues involved, having served in leadership roles in environmental organizations (e.g. several terms as president of a local lake association, and chair of BSU's Environmental Advisory Committee) and I am closely acquainted with the corridor of the Mississippi River and its surrounding wetlands between Lake LaSalle and Pine Point. While the Draft represents a reasonable overview of the inter-related dimensions of decision-making involved, I do not think it is adequate in many of its details and conclusions. I will focus on just a few of these in my comments below.

I have lived for twenty-four years beside Grant Creek, a significant tributary of the Mississippi, about a mile downstream from the present Line 3 crossing. (Indeed I serve as a volunteer stream monitor on it for the PCA). During this time I have come by canoe and ski to know well a large, complex area of river, stream, wetland and forest of the Headwaters SF. Based on this intimate experience, I have found that the data represented in the mapping of the area is insufficient for routing decisions.

The hydrology of this region is extremely complicated, and the maps included in the document oversimplify it grossly. Channels in riverine marshes are never as simple as the maps imply. They are never easy lines on paper. Almost no attention is given to characteristics of the wetlands concerned. In Appendix G ('Watercourse Crossings') this oversimplification is also reflected. The three 'techniques' discussed and pictured in Figures G-1-2-3 are ridiculous in actual circumstances, even child-like.

1373-1

In the mapping and other sections addressing vegetation, both terrestrial and aquatic, specific information on habitat and dominant species is virtually ignored. The potential for seriously disrupted ecologies is thus very underrated in Chapter 12. Nor does Appendix D ('Access Roads Table') account for the habitats affected by the hundreds of new roads proposed, even if they are intended to be 'temporary.' In forest and wetland, any road corridor changes the ecological character of the site indefinitely.

1373-2

There are further instances of this sort that I could cite, but your time is limited. Of course I share with many others grave concerns for the effects that even a minor spill in sensitive areas would present. The risk assessment of this fairly likely event is very under-developed in the draft document. As an outdoorsman, knowing the formidable problems of access in emergencies, the very possibility gives me nightmares. As a retired university professor, I also must question 'sources

and authorship' here. A great deal is being taken on faith directly from the commercial entities making the proposal. Conflicts of interest?

And why is an EIS, especially for the heart of such a vulnerable area, been placed with the Department of Commerce, even if 'assisted' by the DNR and PCA? Should not these science-based agencies of State government take central responsibility? If the superficial nature of what I have briefly noted here characterizes the whole of this massive draft document, it will need very deep revisions by field scientists and managers. The continuing health of Minnesota waters, our diverse communities and economies depend on this.

Thank you for your attention to my comments.

Respectfully,

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