

Levi, Andrew (COMM)

From: Matthew Nameth <nameth.matt@gmail.com>
Sent: Saturday, July 08, 2017 2:23 PM
To: MN_COMM_Pipeline Comments
Subject: Stop Reckless Land Management
Attachments: images.jpg

Dear Public Servant,

This letter is in regards to Line 3, docket number CN-14-916, and docket number PPL-15-137. There are many people across the country keeping a eye on your actions. You have the potential to preserve your beautiful State of Minesota for many future generations. Line 3 is posing a major threat to national security. Being the headwaters of the Mississippi River, and a state of the Great Lakes region, the State of MN and it's elected officials have a comitment to protect our nation, and it's waters. I strongly oppose this project and feel the Line 3 project, if approved, will turn into a situation larger than that of Standing Rock. This letter is in no way a threat. The people will come in a good way. Peacefully. Yet they will be assaulted by unregistered private security firms, militarized police forces, and National Guard for taking action against issues that should not be overlooked by the state of MN. Please ask yourself if you want that in your state.

10 THINGS EVERY AMERICAN NEED TO KNOW ABOUT THE LINE 3 DEIS

Enbridge wants to abandon their crumbling Line 3 pipeline in our lands and build a new one in a new corridor through our lakes, wild rice beds, and treaty territories. The [Draft Environmental Impact Statement \(DEIS\)](#) for the Line 3 pipeline found that every single option for the project would have long-term detrimental effects on tribal communities. Most of the issues specific to tribal people and resources are confined to a separate chapter that attempts to provide “an American Indian perspective”, siloed and excluded from the main chapters that assess potential impacts. The 5000+ page document attempts to justify why the oil industry’s need to profit is greater than the need of the Anishinaabeg people to survive.

These are the 10 ways the Line 3 DEIS has failed to serve tribal communities of Minnesota:

1. NO FREE, PRIOR, AND INFORMED CONSENT OF TRIBAL NATIONS

Enbridge seems to have learned nothing from Standing Rock. Nowhere does the document say that free prior and informed consent of Tribal Nations must be attained through formal Nation-to-Nation consultation before any plans or decisions are made for this pipeline. ¹⁴²⁷⁻¹

The State of Minnesota doesn't seem to understand the basic concept of tribal sovereignty. The route alternatives compared in the DEIS include two routes, called RA-07 and RA-08, that would cross the Leech Lake and Fond du Lac Reservations, despite the fact that the tribes clearly will not consent to a new pipeline. Enbridge's "preferred" route would skirt reservations boundaries while still crossing watersheds and lands of 1855 Treaty Territory. This is a clear attempt to circumvent tribal consent.

2. DISREGARD FOR THE HEALTH OF TRIBAL COMMUNITIES

Chapter 9 of the DEIS acknowledges that impacts on tribal communities "are part of a larger pattern of structural racism" that tribal people face in Minnesota. The DEIS also states that "the impacts associated with the proposed Project and its alternatives would be an additional health stressor on tribal communities that already face overwhelming health disparities and inequities", but concludes that is "insufficient reason" to deny the project.

3. NO CONSULTATION OR PLAN FOR PROTECTING SACRED SITES

Just as we saw in North Dakota, the assessment of archeological artifacts were performed by the company, whose best interest is to put the pipeline through their preferred route at any cost. Enbridge admits that 63 sacred sites are slated for destruction, but claims that only 3 are eligible for protection under the National Register of Historic Places (5.4.2.6.1). Pipeline corporations cannot be trusted to understand and implement protections for our numerous sacred sites.

4. NO PROTECTIONS FOR WILD RICE LAKES

The DEIS acknowledges that "traditional resources are essential to the maintenance and realization of tribal lifeways, and their destruction or damage can have profound cultural consequences." It also shows that Enbridge's preferred route would "impact more 1855 Treaty Territory wild rice

lakes and areas rich in biodiversity than any of the proposed alternative routes.” These sensitive areas would be the worst place for a tar sands oil spill.

5. LINE 3 IS GUARANTEED TO SPILL

The DEIS estimates the annual probability of different kinds of spills on the proposed route:

Pinhole leak = 27% (once every 3.7 years)

Small Spill = 107% (once every 11 months), Medium = 7.6%, Large = 6.1%

Catastrophic = 1.1% (once every 87 years)

Basically what this means is that in 50 years, the 1855 treaty territory can expect 14 pinhole leaks, 54 small spills, 4 medium, 3 large, and 1 catastrophic spill.

The DEIS also contains no spill analysis for tributaries of the St. Louis River (which is already a [toxic superfund site](#)) or Nemadji River, where a spill could decimate our sacred Gichigami, Lake Superior.

1427-2

6. NO “WELLS TO WHEELS” ASSESSMENT OF IMPACT

There is zero discussion of how Line 3 starts at the sacrifice zone of the Alberta Tar Sands where Dene and Cree people continue to be poisoned, raped, and murdered by the most extreme extraction project in the world. Further, there is no mention of how with 370,000 bpd of additional capacity, Enbridge will need a new pipeline departing its terminal in Superior. We know that they plan to expand pipelines through Ojibwe and Ho-Chunk territories in Wisconsin to accommodate. Finally at the end of the line, refineries are poisoning communities of color. Residents live with fear of kidney failure, autoimmune diseases and cancer and early death due to [chemical exposure from massive refineries](#). This big picture must be considered to truly assess the impacts the Line 3 pipeline.

7. NO PLAN TO HOLD ENBRIDGE ACCOUNTABLE

Neither the State of Minnesota nor the Federal Government have a plan for enforcing environmental regulations for Line 3. When searching through extensive databases of Enbridge's spill history, the numbers often disappear once they hit the reservation line. How many spills have already ruptured in our communities without any response or reporting?

Many of the DEIS's environmental impacts and plans for minimizing them are drawn directly from Enbridge's permit application without any evidence of compliance or genuine consideration that Enbridge won't follow all the rules. History shows that they continually violate permit conditions.

8. NO PLAN TO STOP SEX TRAFFICKING IN PIPELINE MAN-CAMPS

The DOC assumes "all workers would re-locate to the area" and zero construction jobs will go to Minnesotans. We are all too familiar with how "the addition of a temporary, cash-rich workforce increases the likelihood that sex trafficking or sexual abuse will occur". But the DEIS dismisses this problem quickly, saying that "Enbridge can prepare and implement an education plan or awareness campaign around this issue" (11.4.1). That is in no way an assurance that our women and children will be any safer come 2018 when construction is slated to begin.

9. INADEQUATE ASSESSMENT OF ABANDONMENT

Enbridge's current plan is to cap off the crumbling old Line 3 pipe in sections and leave it in the ground for landowners to take care of, setting a dangerous precedent for future pipelines in Minnesota, including the NEW Line 3. The risks of abandoning pipelines are not adequately assessed in the DEIS. There is no discussion of the dangers of exposed pipe, how fast it will corrode, or how much currently buried pipe will become exposed once it is emptied. These rusting pipes are conduits, and could one day drain a lake or wetland and dump toxified water onto farm fields. What is the plan for cleaning up the contamination from the countless spills that have already occurred along Line 3? There is also no mention of the abandonment of the other 3 ancient pipelines in Enbridge's existing mainline corridor (Lines 1, 2, and 4), which we expect Enbridge will very soon attempt to follow suit. It should also be known that Enbridge will stop paying taxes to the MN counties along the mainline corridor. For many of these poor northern counties including

1427-3

the Leech Lake and Fond du Lac reservations, revenue from Enbridge's property tax makes up a significant portion of the county budget.

10. THE “NO BUILD” OPTION IS NOT GENUINELY CONSIDERED

The DEIS includes an option of the “Continued Use of Existing Line 3” (Chapters 3 and 4), but nowhere is the “No Build” Alternative considered. Enbridge already has a massive pipeline corridor leaking across our territories. It is not the responsibility of our communities to continue to sacrifice our waters and lands so a foreign corporation can maintain their bottom line. When will the “Shut Line 3 Down Because It’s Falling Apart and Poisoning Our Communities” option be considered?



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MS. SHARON NATZEL: Sharon

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Natzel, S-H-A-R-O-N, N-A-T-Z-E-L.

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I'm talking about the new route

1 for the proposed Line 3 pipeline, which I
2 believe threatens Minnesota's clearest lakes,
3 and that's our fresh water.

4 This proposal would really
5 establish a new pipeline corridor, which just
6 south of Park Rapids, Minnesota, all the way
7 to Superior is really a totally new corridor.

8 It would cross the Mississippi
9 River in multiple spots, also. And this is a
10 water rich environment in that new corridor,
11 and some of the sandy soils are very
12 permeable, and also some of the aquifers are
13 connected.

14 The oil spills could pollute and
15 endanger these fresh waters for our drinking,
16 for our recreation, and our wildlife during
17 the project's lifetime, which we know, because
18 of this replacement project, is at least 50
19 years.

20 So this would be 50 years of
21 potential pollution. The Mississippi River
22 does provide drinking water for St. Cloud,
23 Minneapolis, and St. Paul.

24 We also need to consider, in the
25 Yellowstone River 2015 pipeline spill, which

1 happened under the ice, it was near Glendive,
2 Montana, and there the drinking water had to
3 be replaced with truckloads of fresh water
4 that was brought into Glendive.

5 We know that from our ice-out
6 contests around the area, that we have at
7 least three months of frozen ice here.

8 The United States Geological
9 Service, in November of 2010, did a national
10 research program document entitled, "Water
11 Security, National and Global Issues," and
12 they referenced a United Nations' environment
13 program document.

14 In that document it states that,
15 "By 2025, our global fresh water stress that
16 owes to the increasing population on water
17 use, will increase significantly." And we
18 know that overseas that will happen, but even
19 in the United States.

20 And the document projects that
21 by 2050, nearly 5 billion people will be
22 affected by fresh water scarcity.

23 "By 2025," the document states,
24 "Across the United States the water withdrawal
25 as a percentage of total available is

1 projected to be 20 to 40 percent."

2 And we know that even in
3 Minnesota we're starting to look at
4 groundwater management areas because of the
5 amount of fresh water available, and our
6 straight river groundwater management area is
7 now in that.

8 The EPS also states that Lake
9 Superior is 20 percent of the entire global
10 fresh water.

11 The pipeline corridor goes to
12 Lake Superior. The USGS document also
13 explains that the amount of fresh water is
14 finite, and that fresh water makes up only
15 2.5 percent of all the water on earth.

16 So we need to consider, when
17 we're placing a pipeline corridor, just where
18 our waters are and the soils that we're
19 placing the pipeline in.

20 If we need to have pipelines, we
21 need to also consider our fresh water. All of
22 our water is connected and it's needed for
23 life.

24 Thank you.

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Levi, Andrew (COMM)

From: Ken Neihart <kjneihart@gmail.com>
Sent: Sunday, July 09, 2017 6:01 PM
To: MN_COMM_Pipeline Comments
Subject: Public Comment: Line 3 Project (CN - 14-916 and PPL - 15-137).

Specific Comments:

1. Certificate of Need.

With the number of oil pipeline corridors in the state and the decline in demand for oil in the state and the country, a close look has to be taken when considering the CON. Since 2004 there has been a decreased demand of oil of 14-19% in Mn. and 4-5% in the country. We don't need any new pipeline corridors. The PUC needs to study/analysis the system of oil pipelines and pipeline corridors in the state and come up with a workable solution to move these oil products through the state using the existing corridors. The cost of mining tar sand oil also needs to be considered. How much longer will it be cost effective to continue mining it.

2. Alternate route SA-04:

SA-04 is mentioned in some sections and tables in the Executive Summary but not in others. Is this route considered to be an alternate? In my opinion, the route is a much safer and environmental sounder route than the other alternatives that are being considered. The other alternative routes travel through a more water-rich environment. Evaluation of SA-04 is missing from the following figures ES-9, ES-10, ES-11, Table ES-4, and sections on Habitat Fragmentation and Impact of Fish and Wildlife Habitat. To complete a fair and objective evaluation, SA-04 needs to be included into these portions of the final EIS.

1429-1

3. "Stray Current Corrosion":

Stray Current Corrosion describes the effect a high voltage power line can have on a pipeline that is co-located in the same corridor and the risk is increased when the pipeline is located in a water-rich environment such as a swamp, marsh, etc. The stray voltage travels to the pipeline and can cause corrosion in the pipe. A portion of the applicants preferred route is in a utility corridor with a high voltage power line. I didn't see any mention of a "Stray-current Mitigation System" in the DEIS.

1429-2

4. Economic and Employment:

Minnesota Administration Rules 4410. 2300 (content of EIS) paragraph H requires an EIS to consider environmental, economic, employment and sociological impacts. I didn't see any mention of this in the DEIS. Will this paragraph H be covered in the EIS? The applicants preferred route traverses lake county that depends on tourism year round. This tourism industry has a very large impact on the area's economy and needs to be considered in the EIS.

1429-3

5. Aromatic Hydrocarbons:

Benzene and toluene are examples of aromatic hydrocarbons. These two chemicals are added to the bitumen (tar sand) to thin the bitumen so it can be transported in a pipeline. When there is a spill the hydrocarbons either evaporate or find their way to the water column or water table. Once in the water table, they are transported with the water. The bitumen usually sinks to the bottom in water and is difficult to remove and in some cases impossible to remove. The aromatic hydrocarbons are carcinogenic solvents. I have a cabin on West Fox Lake which is in Fifty Lakes. Fifty Lakes is 4-6 miles south of the applicants preferred route and the water table flows in a southwest direction so any spill could find its way to the city. It also could find its way to the drinking water of some of the residents who have shallow wells. Daggett Brook also flows south from the proposed pipeline and flows into the Whitefish Chain of lakes passing through a couple lakes in Fifty Lakes.

General comments:

1. I was disappointed not to see any comments from the DNR or the MPCA. They were supposed to be part of this process! I had expected comments from these two important state agencies. Their comments on this proposed pipeline need to be part of the process. I would suggest devoting a chapter in the EIS to both the DNR and MPCA for their comments on this proposal.

2. I only saw one author of the DEIS listed.

1429-4

3. Has anyone mentioned the three crude oil pipelines exposed on the Tamarac River?

4. Is there 192 water crossing on the proposed pipeline route?
5. How many other DEIS' has Cardno, Inc. done for the state?
6. What is the maximum number of barrels of oil can be transported in the proposed 36" pipe?

| 1429-5

Thank you,
Ken Neihart

Sent from my iPad

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16 MR. JAMIE KYLE NELSON: Jamie Kyle
17 Nelson. J-A-M-I-E, K-Y-L-E, N-E-L-S-O-N.

18 Since 1999 I've lived right across the
19 road from the Viking pipeline station. And the
20 pipeline has always been courteous. The workers
21 have been great to me, they have been good
22 neighbors.

23 I support the new pipeline, proposed
24 pipeline. I think they're great for the community
25 of Viking, they've donated vehicles and money. They

1 paid a huge amount of taxes and I think it would be
2 a shame for the state to deny the pipeline to go
3 through.

4 I would like to see on that chart that
5 shows the accidental crude oil releases, I would
6 like to see a chart that showed the amount of
7 gallons released for, you know, like per million
8 barrels pumped, so that I could compare the amount
9 of gallons that actually leaked between the rail,
10 the pipeline, and trucks based on how much oil is
11 actually transferred so you can see the amount
12 released per million barrels, or however they wanted
13 to do it. I think that would be helpful, to see the
14 comparison between rail, pipeline, and trucks.

15 So, and that's all on the comments, I
16 guess.

17 Thank you.

Line 3 DEIS comments: Docket #'s: CN-14-916 & PPL-15-137

Abandonment:

The DEIS states that Enbridge has indicated that it would develop of a contaminated sites management plan to identify, manage and mitigate historically contaminated soils and waters found during the abandonment or removal of the existing Line 3 (8.3.1.1.1) Where is the actual plan???

Construction and Restoration:

Cathodic protection will not be installed for up to 1 year after pipeline completion (2.3.2.3). Lack of cathodic protection is the causative factor in many pinhole pipeline leaks. The proposed route follows a utility corridor for much of its length. This is unacceptable.

Economic Impacts:

Chapter 5 states that line 3 will create ZERO permanent jobs. Enbridge's application states that existing operations staff will be able to operate the pipeline and that few additional employees would be hired to assist the staff. Zero construction jobs will go to Minnesota. (5.3.4)

Climate Change:

(Executive Summary pg 18) The DEIS acknowledges that Line 3 would contribute to climate change through analysis of 3 different types of emissions: direct, indirect and lifecycle. The direct and indirect emissions alone would be about 453,000 tons of CO₂ per year, costing approx. \$478 billion over a 50 year life span.

The DEIS does not discuss the unprecedented challenges of human casualty, displacement, conflict, natural disaster, biodiversity loss, etc., that climate change is causing, OR the consensus from the Scientific communities that we must leave fossil fuels in the ground. It also fails to acknowledge that across the planet, indigenous people are disproportionately impacted.

Chapter 9 states that ANY of the possible routes for line 3 "would have a long term detrimental effect on tribal members and tribal resources." It also states that "traditional resources are essential to the maintenance and realization of tribal lifeways, and their destruction or damage can have profound consequences." Why is that finding not reason enough to stop this plan???

Chapter 11.4.1: The DEIS acknowledges that "The addition of a temporary, cash rich workforce increases the likelihood that sex trafficking and/or sexual abuse will occur." Asking Enbridge to prepare and implement an educational plan or awareness campaign to address this issue is not likely to change the outcome. Perhaps you haven't noticed the connection between the rape of women and the rape of the planet's resources yet, but it's there, please wake up...

Specific comments:

History shows that Enbridge continually violates permit conditions. Promises of Enbridge pledges to do this or that without a concrete action plan should not be accepted.

Alternatives to the pipeline are ludicrous. Our focus needs to be on replacing fossil fuels with renewable, sustainable resources; wind, solar, geothermal...all will provide jobs.

We all know pipelines leak – we are at the point that ANY leak is unacceptable. The probability of spills on the proposed route shows that in 50 years we could expect 14 pinhole leaks, 54 small leaks, 4 medium, 3 large and 1 catastrophic...

Thank you, Karen Nielsen



Draft Environmental Impact Statement
Public Comments

07/10/2017 for consideration in the final Environmental Impact Statement for the below mentioned dockets.

Submitted by James W Reents
Leader, Pipeline Working Group
Northern Water Alliance of Minnesota

**RE: IN THE MATTER OF THE APPLICATION OF ENBRIDGE
ENERGY,LIMITED PARTNERSHIP FOR A CERTIFICATE OF NEED AND
PIPELINE ROUTE APPLICATION FOR THE LINE 3 REPLACEMENT
PROJECT IN MINNESOTA FROM THE NORTH DAKOTA BORDER TO THE
WISCONSIN BORDER
(DOCKET NOS.PL-9/CN-14-916 AND PL-9/CN-15-137)**

General comments and observations:

In reviewing the document in the time given I would first request that any information included within the EIS provided by the applicant should be highlighted and boxed with different shading such that one can evaluate the parts of the EIS which the applicant's information stands alone.

I object to the perpetuation of the applicant's "PR speak" with the use of anomalies form leaks, ruptures and pipeline failures as well as missing pipeline coating being referred to as "coating holidays". While the applicant is free to use these terms, the Department of Commerce is not. It gives the perception of bias to the applicant.

The Department of Commerce's consultant in preparing the DEIS, Cardo, states in Chapter 5: "professional judgement based upon other impact statements." I would as what other Impact statements and how they affected that professional judgement. Where any of these others done for the applicant rather than a State entity?

If cathodic protection is necessary for a pipeline, why is it installed a year after construction?

- A full economic analysis of need for additional oil transportation through Minnesota is needed. This should take into account not only the touted benefits of the proposed projects in terms of short-term jobs and additional tax contributions, but also the economic impacts of climate change and mitigation from the continued uses of fossil fuels. While there is impact locally, the economic impact should be considered on at least a national scale as decisions fragmented by state regulatory agencies have impacts

that extend well beyond their jurisdictional boundaries. Since the Environmental Impact Statement is to inform the PUC for consideration of approval or denial of the Certificate of Need, the economic analysis will provide an assessment of whether the proposed project is of benefit to the citizens of the State of Minnesota

- Climate Change needs to be integral to the EIS, not just the evaluation of the additional CO₂ released into the atmosphere from the product transported, but also at the end point of consumption, and on the production end. There was a news release from the Minnesota Pollution Control Agency dated June 14th of this year which cites a new report by the State's Interagency Climate Adaptation Agency (ICAT):

“For several decades Minnesota has seen substantial warming during the winter and at night, with increased precipitation throughout the year, *particularly from larger and more frequent rainstorms*. These two effects will continue to be the leading symptoms of climate change.

These changes have *damaged buildings and infrastructure, limited recreational opportunities, changed our growing seasons, and affected the quality of our lakes, rivers, and drinking water.*” (Italics added for emphasis) For the full report, contact: Risikat Adesaogun, 651-757-2056. This report should be considered in the final EIS. At present, there is no evaluation of changes in construction and specifications regarding construction and severe weather events.

- Line 3 abandonment was initially presented by the applicant with the following statement; the existing Line 3 will be flushed and filled with an inert gas and receive continued monitoring. In the DEIS, other methods of abandonment are presented. The questions unanswered in the several approaches are: for how long, and at what point does the liability revert to the state?

- Reasoning for the Line 3 relocation includes a current line that is operating at reduced capacity because of deterioration within the line. Although the date stated by the applicant has varied from 2007 to 2008, if there was such a need, and the line in such a state of deterioration the Federal Government ordered the reduced volume, why has the applicant continued to operate the line for almost a decade in this deteriorated state? Is it a public responsibility to approve another energy corridor for the convenience of the applicant when the current line demonstrates a lack of maintenance on the existing line and poor planning on the part of the applicant in the existing energy corridor? The DEIS states in Section 3.1 that the risks associated with pipeline removal are similar to a new pipeline project. The applicant also states that repair or removal would inconvenience existing landowners. What about the inconvenience of landowners on the proposed route or any of the alternatives?

- Tar sand oil cleanup methodology; none currently exists for cleanup on water and analysis of risk based upon water crossings and water proximity should become part of the EIS Scope. Information is provided regarding the specific gravity of the dilbit stating it is lighter than water and therefore floats. While the NSF study does state that the oil initially floats, it does so only until the diluent evaporates or is floated off; the tar sands sink. This should be corrected and the NSF study should be referenced.



- Evaluation of the cost of carbon mitigation of the proposed trans-shipped oil in light of climate change and atmospheric carbon reduction goals; both statewide, nationally, and also those targets committed to by the US in the 2015 Paris Climate Summit should be included within the EIS. Nothing done in Minnesota impacts only Minnesota. Carbon impacts should be considered from point of extraction to final consumption. 1570-5
- What will become of stranded assets? Current estimates on Bakken and Williston Basin Oil is that they will be depleted in 20 years. The Canadian Government is saying 80 to 90% of the tar sand oils in Alberta should remain in the ground, negating , except for the short term, any need for a new Line 3. What's to become of the infrastructure? Removal? Abandonment? Other proposed uses by the applicant? 1570-6
- Most major players in the Alberta Tar Sands have either delayed, put on hold, and in some cases, such as Statoil, have pulled out of Tar Sand Oil. Need for additional oil should be included within the EIS. This should be based upon current industry data, not government projections which overestimate demand in light of the changing world dynamics.
- Is the proposed Line 3 as a 36-inch diameter pipeline (12% larger by volume) actually a replacement or an entirely new pipeline, which needs a new US State Department approval? Why is it being considered by the state without this determination. The applicant's statement that it can undertake these improvements under a 1960's permit should, at the very least be questioned and confirmed by the U.S. State Department
- The current State Department EIS review of the Alberta Clipper should be included within the scope of the EIS. Presently, the Alberta Clipper is operating at a capacity for which the lie has yet to be approved through the sleight of hand Line 3 / Alberta Clipper bypass at the Canadian Border. The currently underway EIS was a condition of the original approval of the Alberta Clipper. The inclusion would enhance the evaluation of the Sandpiper ? Line 3 Energy Corridor proposals. One example: it is our understanding that the spill modeling in the current DEIS only analyzes 10 mile downstream while the Alberta Clipper review models 20 mile downstream. No explanation is given for the change in criteria and then the information is closely held "for security reasons".

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- The EIS should include spill modeling under both average and worst-case weather conditions on all river crossings as well nearby lakes, streams and wetlands. Too often modeling is done at average or perfect weather conditions that in turn can skew the findings. The northern part of Minnesota through which this proposal passes experiences at least 5 months of winter and almost as long a period of ice cover. This needs to be taken into account with any modeling. See note above; hard to evaluate information that is withheld.
- Impacts on both natural and human resources: including but not limited to those natural and human resources of importance to the Native Bands and including their retained rights under the 1837, 1854, and 1855 Treaty Areas. The statement of dismissal that native groups would be unfairly impacted by the proposed route but it is not a reason for denial appears racist, whether that was the intent or not. The issue of the exploitation of women was dismissed with the statement that the applicant would provide educational training around the issue for its contractors. This is not acceptable.
- The EIS should include the entirety of the project from beginning to end; i.e.: from the Tar Sands of Alberta or the Bakken and Williston Basin fields in North Dakota to the Gulf Coast.
- The EIS should not assume that the criteria for route evaluation include any intermediate through-points (Clearbrook or Superior) . In the public input sessions conducted by the Department of Commerce, it was unclear as to how system alternatives and route alternatives would be evaluated within the EIS. To be fair to both the applicant and the citizens of Minnesota, both system alternatives and route alternatives should be included within the EIS. The inclusion of the rail and trucking alternatives have no basis in reality. If there is a need for an additional 300,000+ BBD of dilbit from Alberta or any combination of oil types, it is currently being accommodated by other transportation methods. To imply greater risk to large urban areas if the proposal is not built ignores both the market place and restrictions (or lack thereof) of hauling liquids of greater hazard. These options should be stricken from the final EIS or at a minimum refined so that they make sense.

1570-7

1570-8

- Enbridge's initial applications include some information, it should not be used to limit the scope of the EIS nor should any conclusions by the applicant become part of the final EIS. Initially within the proceedings, route alternatives were eliminated based primarily on additional cost to the applicant. Cost to the applicant should only be considered if there is also a public cost considered. Instead, based on the evaluation of the EIS of both route and system alternatives, the least environmentally sensitive with the least impact on Minnesota's natural resources should be considered along with the no build option.

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- A request by the Department of Commerce to add an economist speaks to a lack of time and staff to accomplish the incorporation of public comment into the final EIS in the 30 days within their schedule. One would ask, behind the scenes, who is driving the schedule.
- There should be a chapter included in the final EIS which speaks only to water as a public resource within the state. The quality of the water for drinking purposes as well as the downstream demand for that drinking water over the life of the project needs to be included. One study by the Humphrey School of the University of Minnesota states that because of the current rate of water table drawdown by the metro suburbs, all of the metro area (the majority of the population of the state) will be relying on the Mississippi River for their water supplies within 13 years (2030) Swackhammer, UMN.
 - Additionally, there is a blanket statement accepted within the DEIS that the groundwater table is at a depth of 10 feet. In light of the many wetland and water crossings, I would question 10 feet as even an average. I would estimate that the majority of the pipeline, buried at the 7 foot depth stated in the DEIS would be

1570-9

1570-10

within the water table. Pinhole leaks have a potential to contaminate the water table and remain undetected for long periods of time. While the applicant states they will monitor throughput for loss, they use terms like “beyond a certain threshold for line loss” and “predetermined minimums and maximums”. What are these potential losses? Over time? Hydro testing is mentioned with a demand for 11 to 17 million gallons per spread. No water source of water is identified and the water discharge plan which is approved by the applicant. As statement is made about treating the water before discharge, but to what standard? Water testing on an existing line done, I believe in 2015, sourced water from the Red River in North Dakota and discharged it in Wisconsin. No concern was apparent at that time for treatment. In Northern Minnesota, in light of our challenges with aquatic invasive species, we should not be considering these volumes of water transferred from one point to another without a plan approved by the MPCA.

. The construction plans and techniques are obviously provided by Enbridge boilerplate but it is stated that only Enbridge has the right to issue a stop work order. Especially in light of high pollution sensitivity areas identified, does it not seem reasonable that the State and Federal Governments should have the final say as to appropriate construction and adherence to the required permits issued. We don’t want a “fox guarding the henhouse” situation. Any applicant cannot be trusted to adhere to permits and construction techniques unless verified. The State should step up and not just rely on the applicant’s statements.

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MR. JIM REENTS: Jim, J-I-M,

1 Reents, R-E-E-N-T-S. I'm with the Northern
2 Water Alliance of Minnesota's Pipeline working
3 group.

4 I have four points to make
5 today.

6 FACILITATOR: Jim, sorry to
7 interrupt. Could you please move closer to the
8 mic.

9 MR. JIM REENTS: I have four
10 points to make today. The seven spill sites
11 addressed in the draft do not adequately
12 represent the very sensitive and biodiverse
13 lands and waters of this route.

14 Additionally, with Enbridge
15 withholding much of the information, as
16 Richard said, it can't be analyzed. They did
17 not address wild rice wetlands, the St. Louis
18 River tributaries of Lake Superior, the
19 Nemadji River tributaries, the Mississippi
20 River. All will be impacted by inevitable
21 spills, leaks, or anomalies.

22 One thing we know for sure,
23 pipelines spill. It's not if, it's when. And
24 the product proposed for this Line 3 primarily
25 dealing with tar sands oil cannot currently be

1 cleaned up, and in fact, according to the
2 National Science Foundation, there is no
3 current technology to clean up this type of
4 oil in a water environment.

5 Expand the modeling for water
6 spill sites, and I would recommend that the
7 ten-mile impact range for the analysis should
8 at least be doubled to match the analysis that
9 was done for Line 67 by the State Department.

10 The Enbridge permit application
11 cites what they would do to minimize
12 environmental impact. Nowhere does the draft
13 identify what outside entity or agency will
14 monitor these commitments, supervise the
15 permits, and what regulations are in place
16 that these promises become contractual.

17 Name the outside entities that
18 we can look to and show contracts for this
19 critical process.

20 In Chapter 11 of the EIS,
21 Environmental Justice, the draft acknowledges
22 that any of the alternative routes would be
23 detrimental in the long term for tribal
24 impact.

25

2043-1

2043-2



Comment Form
Line 3 Project Draft EIS Public Meeting

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

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Please share your comments on the Line 3 Project Draft EIS. What could be improved in the EIS? What is missing?

I support the L-3 project. ~~I would~~ I would like to see a statistic that shows all the product that travels from point A to point B that actually makes it to its destination throughout North America. The DEIS should show job creation for construction. Thanks

0443-1