Levi, Andrew (COMM)

From: Rhonwen Personal <rhonwencj@gmail.com>
Sent: Monday, July 10, 2017 8:04 PM
To: MN_COMM_Pipeline Comments
Subject: re the Line 3 Draft Environmental Impact Statement (DEIS):

Dear MN Department of Commerce: I find the Enbridge Line 3 Draft Environmental Impact Statement to unacceptable. See below for reasons why:

1. DEIS Chapter 5.2.1.4
During pipeline construction and maintenance, Enbridge plans to store and apply petroleum products and hazardous chemicals 100 feet from surface waters.
This is an unacceptable risk to MN waters. For comparison, the Boundary Waters Canoe Area Wilderness rule for protecting water is to keep dish soap 150 feet from shore.

2. 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.

3. 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."
Every year there would be a 25% risk of an oil spill and one every four years. We should not accept this high risk probability.

4. DEIS Chapter 10.4.1
Regarding river oil spills, the DEIS uses a 10 mile Region of Interest (ROI), when we know that an oil spill can pollute more than 35 miles downstream (Enbridge's oil spill in the Kalamazoo was 35 miles). The ROI in the EIS should include at least 35 miles of impact. 2266-1

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

Warm Regards,

Rhonwen Tas

MS. NANCY TERHARK: My name is Nancy, N-A-N-C-Y, Terhark, T-E-R-H-A-R-K. I live in the city of Park Rapids just north of here.

I have many concerns with the Enbridge relocated and expanded Line 3 pipeline, but my testimony today will be primarily about the part of the pipeline that goes through the Pineland Sands Straight River Aquifer.

The water from this already compromised aquifer is the main source of water for the City of Park Rapids as well as the source of many private wells, much agricultural and irrigation and various industries in the area.

Enbridge hopes to relocate and expand Line 3 and bring tar sands/build this/coal lake blend oil not only through the lakes, rivers, and waters that make Park Rapids the destination of many tourists, fishermen, and outdoor enthusiasts, but also through the source of drinking water the Park Rapids residents consider vital to their lives.

Those of us who live in Park Rapids have been through changes in our water quality and the cost of treatment for these changes have been added to our water bills for the past two years.

The Pineland Sands Straight River Aquifer has recently come under study by the Minnesota DNR and ECA.

In February of 2015, the DNR Commissioner Tom Landwehr said he was ordering the study of water and wildlife impacts in the

Pineland Sands Aquifer.

A quote from the Star Tribune on February 5th, 2015, he says, "We simply have to get a better handle on what's happening with the water use and quality of this very, very, very important aquifer."

He also spoke about the already compromised aquifer and how some municipalities were having to invest in deeper wells, and the area was home to a number of unique species.

In October of 2016, another Star Tribune article quotes MPCA Commissioner John Linc Stine, "What we do to our land, we do to our water."

The article, "Minnesota's Threatened Rivers," talks about the dangers of continuing to pollute the upper Mississippi watershed, which includes the Pineland Sands Straight River Aquifer, which feeds into the Crow Wing River and continues onward to the Mississippi River.

Most recently, the Minnesota DNR has designated the Straight River groundwater management area that's one of three compromised areas that the DNR put at the top of their list

for a plan to be sure that the groundwater aquifers remain sustainable.

Sustainable cities included in the mapping area include Park Rapids, Osakis, and Hansford.

My questions, to go along -- a couple to go along with that and a couple that don't -- with all the studies being done by the Minnesota DNR and Minnesota Pollution Control Agency, I'm just wondering if any of the information was included in the DEIS? Were the DNR and the MPCA truly involved in it, and if so, in what capacity?

Why was the Pineland Sands Aquifer, an already compromised at risk aquifer system, passed over when selecting the still study sites? There were seven still study sites, but that was not one of them, and a more thorough analysis of different locations is needed.

There's some horizontal drilling under streams and river beds that contain additives that are toxic to aquatic wildlife and vegetation.

The Straight River, a nationally

known brown trout stream, suffered a frac-out during (indiscernible) four project. The public needs to be given a list of these additives to adequately comment.

BAR Engineering, here to testify as an advocate for Enbridge during the Sandpiper hearings. They referred to the groundwater south of Park Rapids as insignificant because it was already polluted.

How can they be trusted to be objective and to behave differently? Enbridge and their contractor prepared the entire report on oil releases and pinhole leaks.

Obviously it works to their benefit to downplay risks and damages. How can we trust them to write an objective report? Why was this not done by an independent expert reviewer?

1547-1

More questions: Who are the private contractors used to compile the EIS? Do they have a work history with the applicant who hired them, State of Minnesota or Enbridge?

And last, but not least, this came to my computer yesterday, I believe it was. It's the definition of regulatory

capture, which is a question I have in the Minnesota DOC.

And the definition is: "Regulatory capture is a theory associated with George Stigler, a Nobel Laureate economist. It is the process by which regulatory agencies eventually come to be dominated by the very industries they were charged with regulating. Regulatory capture happens when a regulatory agency, formed to act in the public's interest, eventually acts in ways that benefit the industry it's supposed to be regulating, rather than the public."

And I ask the Minnesota DOC if they have become a regulatory agency that has fallen victim to Enbridge.

Thank you for your time.

Levi, Andrew (COMM)

From: Kristen Blann <kblann@TNC.ORG>
Sent: Monday, July 10, 2017 3:13 PM
To: MN_COMM_Pipeline Comments
Subject: Docket Nos. CN-14-916 and PPL-15-137 Draft Environmental Impact Statement (DEIS) for Enbridge Energy's Proposed Line 3 Pipeline Project; Request for Public Comment and Review
Attachments: TNC comments on L3_CN-14-916 and PPL-15-137_July 10 2017.pdf

On behalf of The Nature Conservancy in MN, ND, and SD, please accept these comments on Docket Nos. CN-14-916 and PPL-15-137 Draft Environmental Impact Statement (DEIS) for Enbridge Energy's Proposed Line 3 Pipeline Project.

Thank you for this opportunity to provide comment.

Sincerely,

Kristen

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July 10, 2017

Jamie MacAlister, Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101-2198

RE: Docket Nos. CN-14-916 and PPL-15-137 Draft Environmental Impact Statement (DEIS) for Enbridge Energy's Proposed Line 3 Pipeline Project; Request for Public Comment and Review

Dear Ms. MacAlister,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement (DEIS) for Enbridge Energy's proposed Line 3 Replacement Project. These comments are submitted on behalf of The Nature Conservancy in Minnesota, North Dakota and South Dakota ("the Conservancy"). These comments are in response to the DEIS and include comments about project impacts as well as specific information and analyses that we respectfully request be included in the Final Environmental Impact Statement for the Project.

The mission of The Nature Conservancy is to conserve the lands and waters on which all life depends. The Conservancy is a leading conservation organization working in all 50 states and more than 65 countries. We have helped conserve nearly 15 million acres of land in the United States and more than 118 million acres globally. As a pragmatic, science-based, non-confrontational organization, The Nature Conservancy works closely with energy developers as well as state and federal agencies to inform siting and operation of energy sources in a way that balances the needs of nature and people. Our approach is not to question whether energy development and associated transmission infrastructure should proceed, rather the question is where and how to locate energy development to avoid and minimize impacts and how to incorporate mitigation measures for impacted habitats and species.

The Nature Conservancy is also committed to reducing greenhouse gas emissions, including lessening reliance on fossil fuels as a critically important step in a transition to a low-carbon future and in reducing the impacts of climate change.

Enbridge Energy's ("the Applicant") preferred route for the Line 3 Replacement Project crosses through several areas of deep conservation investment for The Nature Conservancy, including: Agassiz Beach Ridges, Kettle and Snake Rivers, Sugar Hills, Upper Mississippi River, Brainerd Lakes, and the St. Louis River Estuary. In these areas, The Conservancy has worked with public agencies, corporations, private landowners, and local communities to "keep clean water clean", and to undertake land protection, management, and restoration

actions across public and private lands, e.g. the $44M Upper Mississippi River Forest Project completed in 2010 that protected 188,000 acres of forest land, wetlands, lake and river frontage through working forest conservation easements intended to prevent fragmentation and conversion of large forest blocks. We continue to work regularly in specific areas of the Mississippi headwaters (e.g. Rum River watershed, Camp Ripley Sentinel Landscape, Brainerd Lakes area, Anoka Sand Plain), in partnership with more than 30 agencies and NGOs, to rigorously develop and implement strategies to protect the healthiest forested watersheds, lake, wetland and riverine habitats so that they continue to support a diversity of species in the face of a changing landscape and changing climate.

The quality of lakes and streams are intimately linked to the quality of the lands adjacent to them. The extensive network of rivers and streams, thousands of lakes and adjacent high quality forests that make up the headwaters of the Mississippi River are especially important. For this reason, the Mississippi Headwaters Basin in Minnesota has been identified as a major freshwater conservation priority for The Nature Conservancy in Minnesota, North Dakota, and South Dakota. This landscape provides significant habitat to an abundance of biological diversity. Its exceptional lakes, extensive forests, important freshwater resources, and climate-resilient strongholds support native species, including the federally protected bald eagle, gray wolf, and Canada lynx, and state-listed species of concern (e.g. short-eared owl, red-shouldered hawk; little brown myotis, big brown and northern long-eared bats; Blanding's turtles; black sandshell, fluted shell, elktoe, spike, and creek heelsplitter freshwater mussels; and many, many others identified as state species of greatest conservation need (SGCN) such as the golden-winged warbler). Additionally, this region is critically important to the supply of fresh, clean drinking water to nearly 2 million Minnesotans, as well as millions of people downstream who are dependent on the valuable, clean, water resources that originate in the Mississippi headwaters.

Recognizing the importance of the Mississippi Headwaters region, from Lake Itasca to the Twin Cities, The Nature Conservancy has recently launched a new initiative aimed at protecting healthy lands and waters and keeping clean water clean. This new initiative, the Minnesota Headwaters Fund, is working to raise significant public and private funds to protect high priority fish and wildlife habitat as well as clean drinking water benefits in Minnesota's healthiest watersheds. The goal of the Minnesota Headwaters Fund is to provide a sustainable funding source for the conservation of natural ecosystems that simultaneously supports biodiversity conservation benefits, such as protecting aquatic habitat for native fish and wildlife, while ensuring clean, drinking water supplies for local and downstream communities.

Of particular interest and concern to the Conservancy is potential long-term degradation and loss of wild rice habitat. Wild rice is an indicator for healthy water quality and watershed function, in that it tends to decline in response to cumulative watershed stresses such as altered hydrology or water quality. It is a significant cultural and natural resource to both people and wildlife, providing food and habitat for numerous wildlife species, many of which are also sensitive or state species of greatest conservation need (SGCN; e.g. American bittern, Sora rail, Yellow Rail, Trumpeter swans) as well as important game species (e.g. American black duck, Northern pintail). Although the extent of wild rice has declined

significantly across the northern states, including some parts of Minnesota, the portion of the state where the pipeline is proposed contains some of the healthiest remaining stands of wild rice in the U.S. The cultural and ecological significance of wild rice to Minnesota—and the value of protecting it—cannot be overstated. Chapter 5 of the DEIS states that Enbridge's preferred route would impact more wild rice lakes, forests, and areas ranking high or outstanding for biodiversity than any of the proposed alternative routes.

The Applicant's preferred route for the Line 3 replacement would involve approximately 340 miles of new 36-inch diameter, underground crude oil (light, medium, and heavy crude) pipeline that would be constructed along a route between the North Dakota/Minnesota border and the Minnesota/Wisconsin border. The proposed corridor runs from North Dakota, Minnesota to the existing Enbridge Superior station and terminal facility near Superior, Wisconsin. It enters Minnesota just south of Grand Forks, North Dakota, heads east to Enbridge's Clearbrook terminal and then south toward Park Rapids along an existing crude oil corridor. From Clearbrook Terminal, the new Line 3 proposes the same new route as the previously proposed and now withdrawn (or deferred) "Sandpiper" pipeline. Although both projects follow existing electric transmission right of way and other infrastructure for much of the preferred route, both also involve substantial disturbance along a new pipeline corridor that is proposed to cross what citizens, tribes, and agencies have all identified as some of the highest quality lake, river, wetland, wild rice, and forested watershed habitats remaining in Minnesota, including areas identified as high conservation priority in the 2015 update to the State Wildlife Action Plan, as well as many lakes and watersheds identified as high priorities for protection through the Minnesota Pollution Control Agency's recent Watershed Restoration and Protection Strategy development processes being conducted in each of the state's major watersheds.[1]

Specifically in reference to the Conservancy's identified freshwater priorities in the Mississippi Headwaters, the Line 3 corridor proposes to cross the highest scoring aquatic priority areas in several places (Attachment B, Fish and Wildlife Benefits Model and C, Priority Areas for Drinking Water):

1. The Mississippi River headwaters north of Lake Itasca and the state park
2. US 71 corridor crossing, west of Island and Potato Lakes
3. The Shell River southwest of Park Rapids
4. The large wetland complex west of MN64 and south of MN87, associated with the Crow Wing River crossing south of First, 2nd and 3rd Crow Wing Lakes.
5. Pine River watershed: headwaters in the Foothill State Forest and south of Pine Mountain Lake; as well as the headwater areas between Roosevelt and Washburn Lakes
6. The Mississippi River crossing in Aitkin County
7. The entire corridor in Aitkin County from where the route crosses the Sandy River flowage (upstream of Davis Lake) to the headwaters where it crosses into Carlton County and the Kettle River headwaters

[1] See Crow Wing River WRAPS, Pine River WRAPS; Leech Lake River Watershed WRAPS reports. https://www.pca.state.mn.us/water/watersheds

Cumulative Effects

Chapter 12 of the DEIS addresses potential cumulative effects, and both Chapters 5 and 12 address the issue of habitat fragmentation. The DEIS is clear in many places that construction and operational impacts from the Applicant's Preferred Route result in the greatest amount of disturbance to and loss of forested habitat, and the largest number of crossings of wild rice lakes. We note that the figures in the Executive Summary and Chapter 5 on impacted forest and wetland acres as well as wild rice, trout streams, and lakes of biodiversity significance from the preferred route are significant. For example, the DEIS notes that "a total of 38 miles of the Applicant's preferred route, for example, would permanently fragment 21 large-block habitats" (Executive Summary pg ES-15, Chapter 5, pg 5-264). The negative impacts of cumulative effects are not fully captured by simple summaries of impacted acres. Ecological research is clear on this point: habitat loss and fragmentation is one of the leading causes of biodiversity declines and losses locally and globally, and the effects are cumulative and may be irreversible when habitat loss or fragmentation reaches certain thresholds[2]. In addition to direct habitat impacts, infrastructure corridors also provide vectors for introduction and spread of nuisance and invasive species. Therefore, we raise the question of whether the DEIS has adequately accounted for the cumulative impacts of habitat fragmentation for sensitive biological and ecological resources. Impacts from cumulative effects of habitat fragmentation, degradation, and loss are extremely difficult to mitigate. We also note that one of the alternative routes considered (SA-04) largely eliminates the impacts to large forest blocks as well as the need for extensive ecological mitigation. 2267-1

We appreciate that the DEIS evaluates climate change impacts, including the specific greenhouse gas emissions associated with the proposed Project and its alternatives in Sections 5.2.7 and 6.3.7 (including direct and indirect effects) and the cumulative potential effects of greenhouse gas emissions on climate in Section 12.5. We note that the DEIS makes it clear that climate change in all cases compounds the risks from the project, including potentially exposing the project itself to higher risk of damages and spills (pages 12-35 and 12-36). The DEIS also acknowledges that most of the state-listed species along the Applicant's preferred route are unlikely to be very adaptable to climate change (pages 12-38 to 12-39), which compounds their vulnerability to habitat loss and disturbance. To these observations, we add that wild rice is also sensitive to water quality and hydrologic disturbance, and is likely to be negatively impacted by increased frequency and intensity as well as unseasonal timing of precipitation events. 2267-2

[2]Groves and Game (2015) contains a thorough discussion and references (Craig R. Groves, Edward T. Game. 2015. *Conservation Planning: Informed Decisions for a Healthier Planet*. MacMillan Publishing, Greenwood Village, CO.) These thresholds, though real, are often difficult to quantify, especially in advance.

The Need for a Comprehensive, Statewide Approach to Energy Infrastructure Siting and Development.

The state of Minnesota would benefit from a comprehensive, statewide approach to evaluating energy infrastructure, such as a Generic EIS as provided for in MINN. R. 4410.3800 (2009).[3] Enbridge's Line 3 project represents at least the 5th request in recent years for a Certificate of Need for a major pipeline project or expansion[4], including the Sandpiper project which would have followed much the same route in Minnesota, withdrawn in 2015.[5] A 2016 paper found that energy sprawl is, and will likely continue to be, the largest driver of land use change in the U.S. for the foreseeable future.[6] The study's authors recommended improved siting of facilities and infrastructure, energy conservation, and more end-use energy production (such as rooftop solar) in order to speed the transition to low-carbon energy production while avoiding impacts to natural areas that support wildlife and benefit people. In previous public record comments on pipeline projects in the eastern U.S. (e.g. the proposed Atlantic Coast Pipeline (ACP) and associated projects), conservation organizations, including The Nature Conservancy in North Carolina, Virginia, and West Virginia as well as the Conservancy's Central Appalachian and Albemarle Sound Projects have specifically requested programmatic approaches to large scale energy infrastructure, and landscape-scale application of the mitigation hierarchy (avoidance, minimization, and measures to offset or compensate) for energy and other infrastructure development, as called for in President Obama's Executive Order 13604 and the May 2013 Presidential Memorandum (PM) on "Modernizing Federal Infrastructure Review and Permitting Regulations, Policies, and Procedures." Conversion of forest and wetlands is already one of the most pressing conservation issues affecting the Mississippi Headwaters region.[7] The current DEIS acknowledges in many areas (e.g. Chapters 5, 10, 12) that the risks, impacts, and costs to habitat, drinking water, and climate are significant; yet in our view the analysis does not go far enough in summarizing the cumulative and synergistic costs. Likewise, we find it likely that going forward, there are additional alternatives to meeting Minnesota/society's energy needs that have not been fully identified and scoped. A statewide assessment led by the State of Minnesota would identify least impactful route corridors, provide better certainty for developers, and reduce conflicts and the need for project-by-project evaluation each time a new one is proposed. This would also meet the need for assessing the "Water-Energy Nexus", highlighted as a major issue in the 2011 Minnesota Water Sustainability Framework.

2267-3

[3] MINN. R. 4410.3800 Generic EIS, Subpart 1. Order for: A generic EIS may be ordered by the EQB to study types of projects that are not adequately reviewed on a case-by-case basis."

[4]Minnesota's Petroleum Infrastructure: Pipelines, Refineries, Terminals. Updated: October 2016. INFORMATION BRIEF. St. Paul, MN: Research Department Minnesota House of Representatives. http://www.house.leg.state.mn.us/hrd/pubs/petinfra.pdf

[5] Ibid. Note, however, that the section on "reasonable and foreseeable actions" includes the possible scenario of co-location of additional, unspecified pipeline projects in the near future.

[6] Trainor AM, McDonald RI, Fargione J (2016) Energy Sprawl Is the Largest Driver of Land Use Change in United States. PLoS ONE 11(9): e0162269. https://doi.org/10.1371/journal.pone.0162269

[7] Lark, TJ, JM Salmon, and HK Gibbs. 2015. Supplementary Information for "Cropland expansion outpaces agricultural and 1 biofuel policies in the United States" Environ. Res. Lett. 10 (2015) doi:10.1088/1748-9326/10/4/044003. See also: Star Tribune series "Minnesota's Threatened Rivers", http://www.startribune.com/mighty-mississippi-river-faces-mounting-environmental-threats/393294611/

Risk and Potential Impacts of Spills and Accidental Releases

The DEIS addresses potential changes in wetlands, beaches, shores, streambeds, and lake bottoms; contamination of groundwater aquifers; contamination of wildlife; and fate and transfer of spills and degradation products where effects may persist for years such as marshes, backwaters, and protected shores[8].

The DEIS estimates the annual probability of different kinds of spills on the proposed route (Chapter 10, Tables 10.2-4 – 10.2-6):
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)

This suggests that over 50 years, much of the affected area can expect up to 14 pinhole leaks, 54 small spills, 4 medium, 3 large, and 1 catastrophic spill. The risk that this poses to our aquatic priorities is a serious concern. The final EIS should include response plans and commitments to full mitigation in the event of a spill or accidental release, including financial accountability. The effects of oil releases on aquatic systems may be far-reaching. As part of any selected route permits, the state should ensure that adequate monitoring is in place, funded by the Applicant, to ensure early detection of and avoidance of impacts from construction, maintenance, and/or operational leaks or spills to biologically and culturally significant natural resources, fish and wildlife habitat, and drinking water. We also request that detailed, comprehensive, and fully resourced spill response and mitigation plans be developed and made publicly available.

Mitigation

The Conservancy's approach to environmental review is guided by the "mitigation hierarchy," which provides that the guiding principles for conserving natural resources are to avoid, minimize, mitigate and compensate for environmental impacts, in that order. The DEIS generally addresses the need to avoid and minimize impacts (Chapter 5). For example, the DEIS acknowledges both direct and indirect impacts on groundwater, surface waters, as well as protected wildlife resources such as bald eagles and other migratory bird species federally protected under the Migratory Bird Treaty Act of 1918 and the Bald & Golden Eagle Protection Act of 1940. The DEIS states the "Applicant would work with Minnesota DNR and USFWS to develop measures to avoid and minimize destruction of migratory birds" (p. 5-262, 263).

Mitigation for construction and operations, as well as emergency spill response plans and post-spill mitigation, are discussed. However, we reiterate the importance of committing to full mitigation plans for affected species, water bodies, interior forests, and other identified high-value ecological resources for both construction impacts as well as potential damages from accidental spills and releases, focusing on offsets and compensatory mitigation. The

[8] Kingston, P. F. (2002). Long-term environmental impact of oil spills. Spill Science & Technology Bulletin, 7(1), 53–61

Conservancy requests that the Applicant be required to fully develop mitigation plans for critical resources likely to be impacted by the proposed project in advance of permitting construction and more fully describe those plans in the FEIS. We further emphasize the importance of having adequate monitoring in place to ensure early detection of and avoidance of impacts from construction, maintenance, and/or operational leaks or spills to biologically and culturally significant natural resources, fish and wildlife habitat, and drinking water.

Furthermore, it is not clear that existing plans and requirements for mitigation will be required to fully address cumulative effects as described in Chapter 12. The final EIS should include commitments to the full mitigation hierarchy, according to best practices and principles for mitigation considering landscape context, additionality, equivalence, and temporal location.[9] In the event of a major spill, it seems unlikely that existing obligations to compensate for damages will be adequate to compensate for the loss of resilience from cumulative effects of habitat loss, degradation, and climate change.

Summary

The DEIS does a thorough job of presenting the significant potential costs of and impacts from the proposed Line 3 Replacement Project and alternatives for Minnesota's high quality forests, wetlands, lakes and rivers, fish and wildlife, cultural and recreational natural resources. These impacts clearly have the potential to negatively impact The Nature Conservancy in MN, ND, and SD's freshwater aquatic priorities in the Mississippi Headwaters, St. Croix, and Lake Superior watersheds. This applies both to construction impacts as well as potential damages from accidental spills and releases.

Regardless of the final decision regarding the Certificate of Need for the proposed route or an alternative, we respectfully request that the final EIS and subsequent permits include the following elements:

- commitment to full mitigation plans (including offsets and compensatory mitigation where appropriate) for affected species, water bodies and wetlands, interior forests, and other identified high-value ecological resources for both construction impacts as well as potential damages from accidental spills and releases
- commitment to complete mitigation plans (including offsets and compensatory mitigation as necessary) for all state and federally listed species (including species listed by neighboring states) as well as state listed SGCN (as appropriate)
- Adequate monitoring in place to ensure early detection of and avoidance of impacts from construction, maintenance, and/or operational leaks or spills to biologically and culturally significant natural resources, fish and wildlife habitat, and drinking water
- Adequate spill response and mitigation plans

[9]McKenney B. and J. Wilkinson. 2015. Achieving Conservation and Development: 10 Principles for Applying the Mitigation Hierarchy. Development by Design Program, The Nature Conservancy. https://www.nature.org/ourinitiatives/applying-the-mitigation-hierarchy.pdf

The Conservancy's overarching recommendation is that the state of Minnesota engage in a more thorough and comprehensive process to evaluate ongoing and future energy infrastructure impacts as a whole, rather than one project at a time. A comprehensive process such as development of a Generic Environmental Impact Statement on Energy Infrastructure (ideally encompassing alternatives designed to meet Minnesota's identified needs for a transition to renewable energy and achieve state climate / CO_2 emissions targets) would simultaneously consider the purpose and need of each project, the cumulative impacts of these projects on land and water resources in Minnesota—perhaps in conjunction with impacts in neighboring states—and identify areas to permanently avoid for habitat conservation, drinking water protection, and other priority resource values. Such an assessment should be completed prior to issuing a Certificate of Need for additional pipeline and other energy infrastructure projects in the future.

Thank you for the opportunity to provide comments on this important issue. If you have any questions about these comments, please contact me at 612-331-0705, or dshaw@tnc.org.

Sincerely,

Douglas T. Shaw, Ph.D
Assistant Chapter Director
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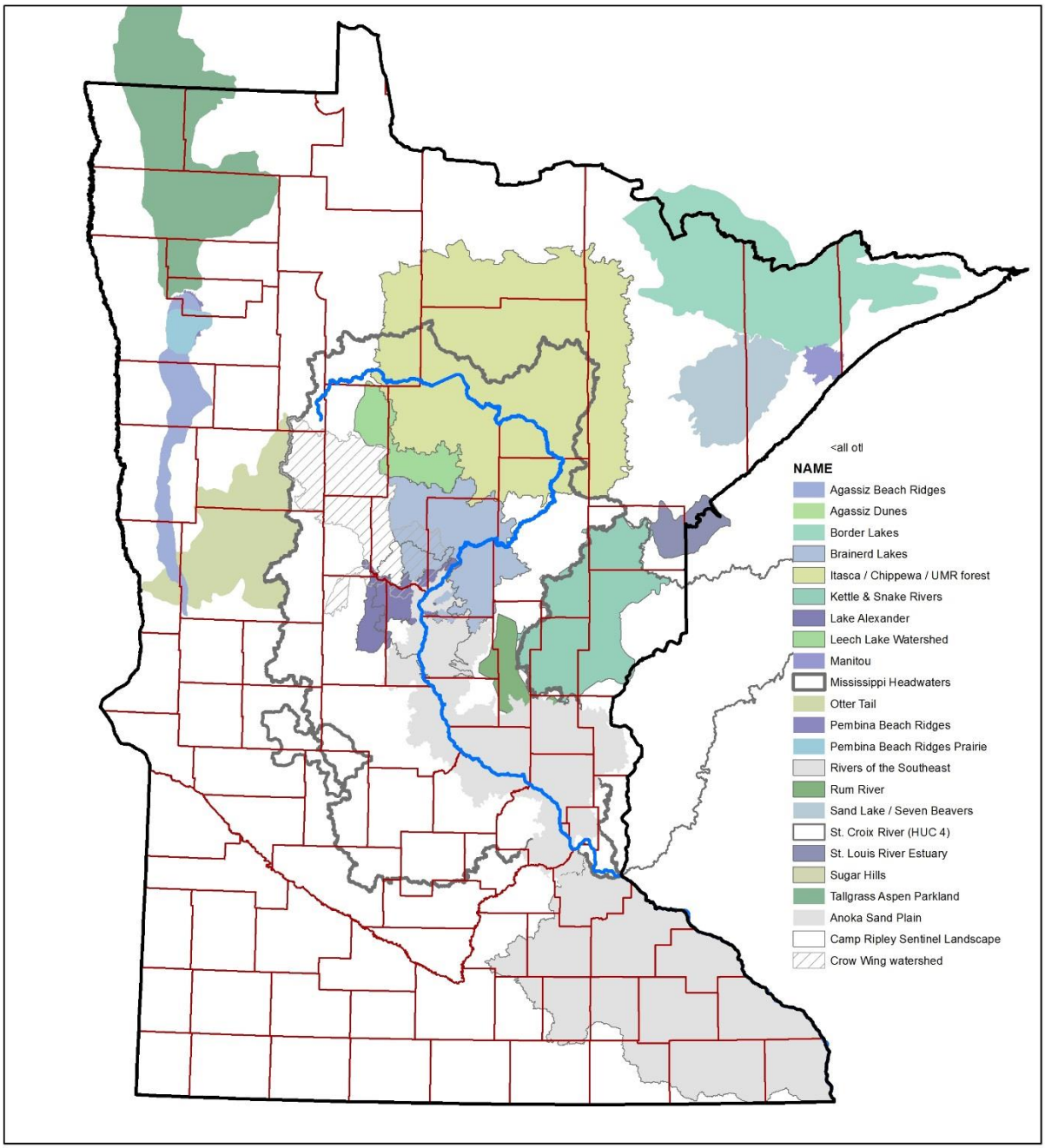
Attachments:

Figure A. Active Conservation Priority Landscapes for The Nature Conservancy in the Mississippi River Headwaters & Northern Minnesota

Figure B. Applicant's Preferred Route in relation to The Nature Conservancy's Freshwater Multiple Benefits analysis for setting Mississippi Headwaters Protection Priorities (Fish and Wildlife Module).

Figure C. Applicant's Preferred Route in relation to The Nature Conservancy's Freshwater Multiple Benefits analysis for setting Mississippi Headwaters Protection Priorities (Drinking Water Module)

Attachments



Active Conservation Priority Landscapes
for The Nature Conservancy
in the Mississippi River Headwaters &
Northern Minnesota

The Nature Conservancy
Protecting nature. Preserving life.™

Figure A. Active conservation landscapes for The Nature Conservancy in MN, ND, and SD.

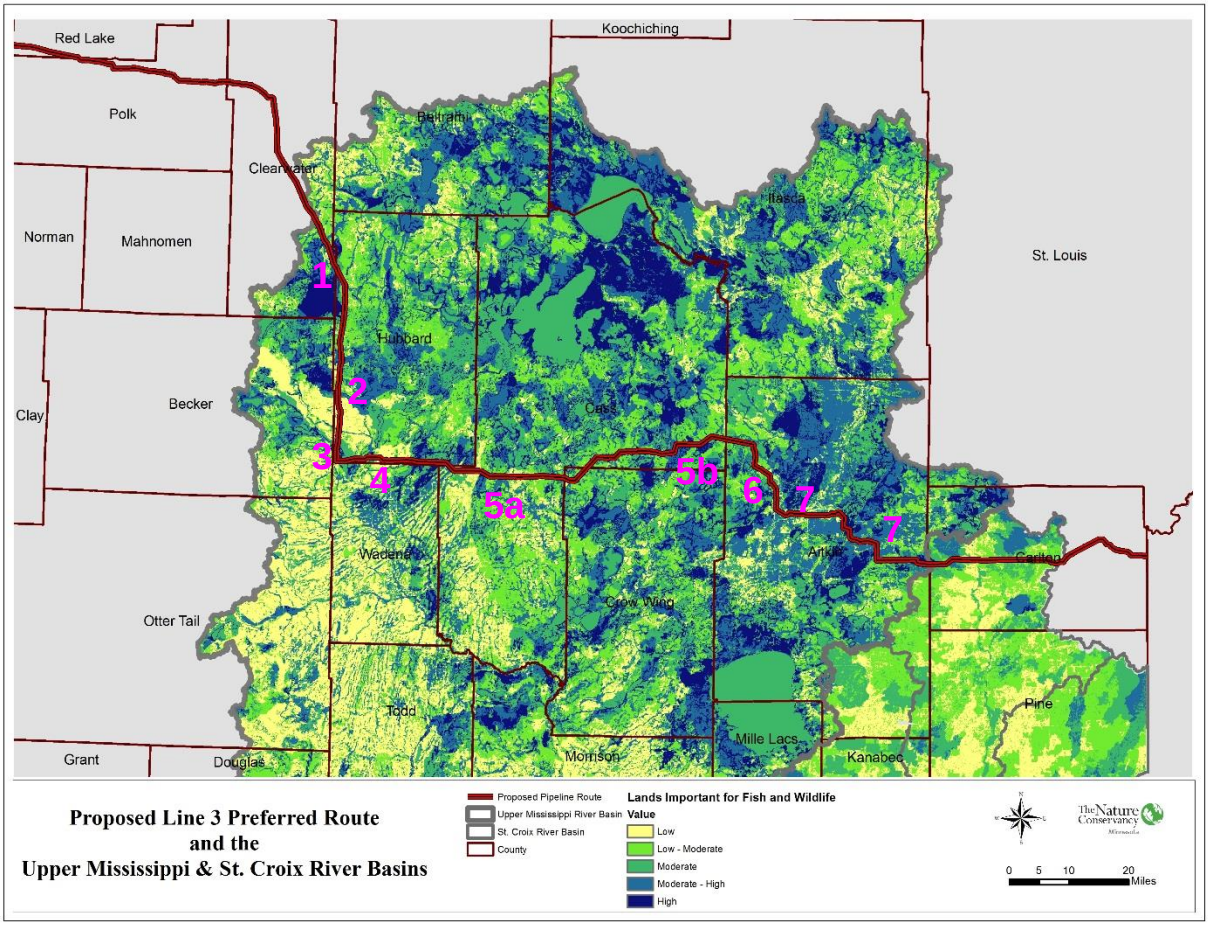


Figure B. Applicant's Preferred Route in relation to The Nature Conservancy's Freshwater Multiple Benefits analysis for setting Mississippi Headwaters Protection Priorities (Fish and Wildlife Module).

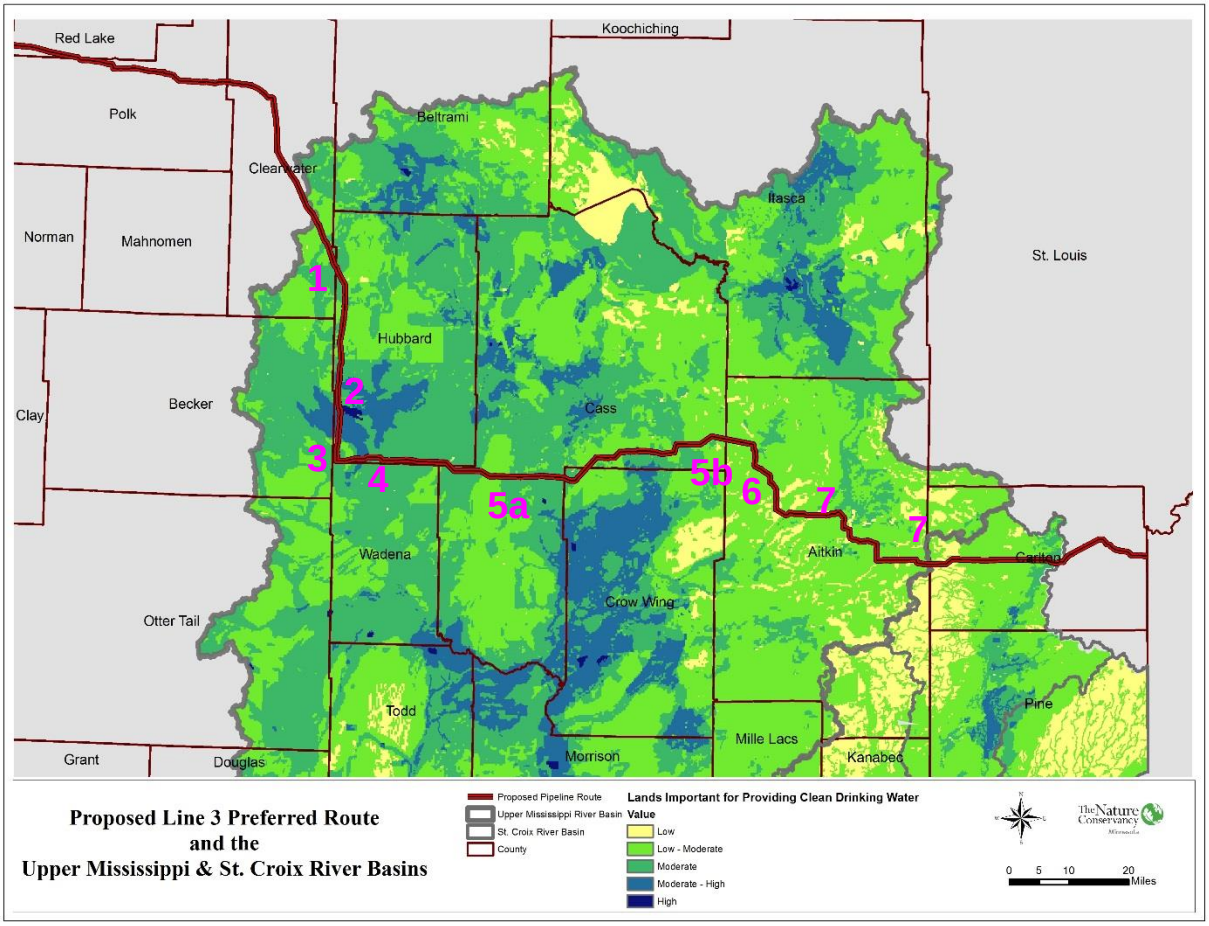


Figure C. Applicant's Preferred Route in relation to The Nature Conservancy's Freshwater Multiple Benefits analysis for setting Mississippi Headwaters Protection Priorities (Drinking Water Module)

Levi, Andrew (COMM)

From: Jennifer <jenniferinthegardens@msn.com>
Sent: Sunday, July 09, 2017 12:50 AM
To: MN_COMM_Pipeline Comments
Subject: CN-14-916 and PPL-15-137

I have grave concerns about Enbridge's proposed Line 3 expansion and relocation tar sands oil pipeline route. In addition, I even question the NEED for the pipeline as alternative energy is fast becoming less expensive, far safer and wiser for our earth and its inhabitants. With clean water becoming ever more scarce on our earth, it is not only prudent, but more critically important than ever that we work carefully together to keep oil out of some of North America's cleanest water here in northern Minnesota. The risks are too great; the potential damage too severe. My values dictate that life and health for people, plants, animals, land, water and air are more precious and important than corporate demands and profits.

Nevertheless, here are a couple of specific questions needing your sincere and thorough attention.

1. Enbridge has proposed to horizontally drill under certain stream and river beds. The drilling fluids used for that process contain additives. These additives are toxic to aquatic wildlife and vegetation if a frac-out occurs. The Straight River, a nationally known brown trout stream, suffered a large frac-out during construction of the MinnCan Line 4 project. A drilling materials list should be provided to the public. The public cannot adequately comment without knowledge of these materials. What are those additives? 1488-1

2. The Applicant's Preferred Route has numerous minor route alternatives to avoid significant features in the environment. Why were "minor route alternatives" not considered in the overall SA-04 route analysis?

3. In the Geology and Soils analysis why aren't the specific, not the generic, types of soils used in consideration of impacts whether construction or oil spills? 1488-2

4. A recent Enbridge direct mail promotion states 13,600 jobs will be created by the Applicant's project, but in the draft EIS the maximum number of jobs created is 4800, 600 local workers and 4200 non-local workers. Which is the correct figure? Explain the discrepancy. Who provided the information for calculating those numbers? 1488-3

Looking forward to a care-filled review,

Jennifer Therkilsen
19715 Grandview Drive
Park Rapids, MN

Levi, Andrew (COMM)

From: Rachel Thibault <rachel.thibault53@gmail.com>
Sent: Sunday, July 09, 2017 10:17 PM
To: MN_COMM_Pipeline Comments
Subject: Docket CN14-916 & PPL-15-127 Draft EIS for proposed Line 3 pipeline
Attachments: Pipeline testimony.docx

Please see attached testimony regarding the DEIS for Line 3 project.

Rachel & Jack Thibault
Minnetonka, MN 55305

Hello,

We are writing to state that we oppose the proposed Line 3 replacement project. We are lifetime residents of Minnesota. Like all Minnesotans, we are proud of our pristine northern lakes, which are famous for wildlife, fishing and recreation.

Our key concerns related to this proposed new pipeline are that the DEIS (Draft Environmental Impact Statement) does not fully address the many risks associated with (1) building the pipeline; (2) abandoning the existing Line 3 pipeline; and (3) leaks that, statistically, will likely occur. The DEIS states many risks of Enbridge's proposal but does not fully analyze the impact to our environment—this is a key gap that needs to be corrected in the final EIS.

1. Many of the environmental impacts and plans for minimizing them are drawn directly from Enbridge's permit application ("Enbridge would do this" and "Enbridge would do that") without any evidence that Enbridge will do what is claims it will do. The DEIS should analyze the likelihood of compliance and the cost to the environment if they do not.

2. In Section 8.3.1.1.1 related to abandonment of the existing Line 3, the DEIS states that Enbridge has indicated that it would develop a contaminated sites management plan to identify and mitigate contaminated soils and waters found during the abandonment of Line 3. We need to see that plan, yet there is no plan. It should be submitted and scrutinized.

3. In Section 8.3.1.2, the risks to critical habitat as a result of the aging pipeline creating hydrological connections are stated. While Enbridge proposes segmentation to mitigate the risk, they admit that the potential need for more segmentation requires further study – and the DEIS states that state, federal and tribal agencies may require more segmentation; these studies need to be done now and be included in the EIS.

4. The DEIS contains no spill analysis for tributaries of the St. Louis River or Nemadji River, where spills could decimate Lake Superior and the harbors of the Twin Ports.

5. The DEIS looks at a 30 year timeline to calculate impact—but lines 1-4 are all 55-65 years old. The analyses need to be redone using a more realistic time line .

6. The 7 sites chosen for spill modeling are not representative of the locations and resources put at risk along the entire corridor. A more thorough analysis of different locations is needed - for example, what about Lake Superior?

   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)

1489-1

Using the DEIS probabilities - Over a 50 year pipeline lifetime, we can expect 14 pinhole leaks, 54 small spills, 4 medium, 3 large, and 1 catastrophic spills. What would one small spill – let alone 54 small or 3 large spills – do to our pristine MN lakes?

7. Chapter 2, "Project Description" states that Enbridge has requested a 750-foot route width--375 feet on each side of the proposed Line 3 centerline. They claim only 50 of the 750 feet would remain a permanent right-of-way (2.1)—so why do they need to affect such a broad area? This is not a small amount of land that would be damaged/destroyed by the construction, given the 340 mile length of the requested pipeline.

8. Enbridge's proposed process for restoring wetlands includes dumping the soil back in the trench (the soil being compacted as a resulted of driving equipment over it, which is bad for the soil), sowing some oats and "letting nature take it's course". This is inadequate, and the DEIS should address proper restoration. Studies have shown that even with proper restoration practices, it can take decades to get back to the biological functioning it was at prior to disturbance.

9. The DEIS states that it will be very risky to remove and clean up the existing Line 3 because the pipelines are very close together. "The distance between pipelines within this corridor varies, but they are generally 10 to 15 feet apart" (8.3.1). This is not consistent with our extensive observations and physical measurements on the land. Also, they routinely dig up pieces of pipe for maintenance purposes. Why is it suddenly risky?

    - The DEIS COMPLETLY IGNORES APPLICABLE POLICY REFERENCES
    - Paris Climate Accord & Dayton's Re-commitment to Accord
    - State Energy Policy
    - Minnesota Environmental Policy Act
    - Greenhouse Gas policy
    - Legislative Energy Commission: Primer on Minnesota Energy - March 11, 2016
    - Minnesota's 2025 Energy Action Plan
    - Global Climate Leadership Memorandum of Understanding (Under 2 MOU)
    - Next Generation Energy Act
    - Civic Engagement Plan (Gov's Order)

10. 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 community that we must leave fossil fuels in the ground.

11. The decision on Enbridge's request to abandon Line 3 could set a precedent, yet there is no mention of the potential abandonment of the three other aging pipelines in Enbridge's existing mainline corridor across MN (Lines 1, 2, and 4), which Enbridge might next attempt to abandon. Nor is there any discussion of the abandonment of the NEW Line 3 in 50-60 years. We don't know whether Enbridge will still be around in 50-

60, or 100 years – if they are not, we would put a costly burden on future generations – risking their health and right to clean water and land.

In addition, the DEIS does not address the fact that the demand for oil is declining, posing the question of whether building new, increased capacity infrastructure for a declining energy source at a very high risk to our environment makes sense for MN.

Please do not grant a Certificate of Need.

Jack & Rachel Thibault

Levi, Andrew (COMM)

From: troo0001 University of Minnesota <troo0001@umn.edu>
Sent: Sunday, July 09, 2017 11:37 AM
To: MN_COMM_Pipeline Comments
Subject: Comments on Line 3 DEIS
Attachments: Comments on Chapter 8 of the Enbridge Line 3 Replacement Draft EIS, Submitted by Troy Trooien 9 July 2017.pdf

Hello
The attached pdf document contains my comments on line 3 DEIS. Please add them to the record.

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Comments on Chapter 8 of the Enbridge Line 3 DEIS

Dealing with the existing line 3 is a process that will involve considerable costs and risks. Enbridge has produced a deactivation plan that calls for abandoning existing line 3 in the ground. Naturally, Enbridge's plan is one that primarily reflects its own interests. The major shortcomings of Chapter 8 of the DEIS are that it is not sufficiently critical of the Enbridge deactivation plan and fails to balance the Enbridge perspective with independent perspectives.

The law requires that the EIS provide the information and analysis the PUC and the public will need to make decisions about the treatment of existing line 3. Because the DEIS fails to point out the obvious shortcomings of the Enbridge deactivation plan, it must be redrafted. Following are matters that need more attention.

1. Purging and cleaning Abandoned Line 3

Enbridge claims:

- Line 3 will be purged of oil
- Line 3 will be cleaned
- The techniques to be used for these operations exist and are adequate

Enbridge claims to have tested a pipeline cleaning method. Referencing that test, Enbridge makes the following statement in the first paragraph of page 19 of 83 of Appendix B: "Scientific analysis of the rinse water concluded that 99.9999987% of the product was removed from the pipeline after the cleaning regime was completed."

The stated fact (that the rinse water had a very low percentage of "product") is misleading. If the Enbridge cleaning method leaves oil in the pipe, a batch of rinse water is not likely to remove it. After all, water and oil do not readily mix. Thus, the discovery that the rinse water contains very little oil is not an indication that the cleaning method was effective. If Enbridge had wanted to demonstrate that their cleaning method was effective, they would have entered the pipeline and examined it. There is no indication they did so.

If Enbridge is to be allowed to abandon existing line 3 in the ground, they must purge and clean it, at the absolute minimum. Whatever cleaning method is used must be effective. As written, the DEIS accepts the Enbridge cleaning process uncritically.

It is not sufficient to accept the applicant's statement that they have an effective cleaning method. It is the responsibility of the PUC to know that an effective method exists. The purpose of the EIS is to examine the Enbridge plan critically, to subject it to analysis of independent experts, and to compare it to methods used by others. Only then will the EIS have fulfilled its purpose of fully informing the choices that need to be made by the PUC.

Furthermore, the PUC must condition any permit it may grant with timelines and penalties to assure the work is completed. The EIS would serve the public interest better if it drew the PUC's attention to this by stating it clearly.

2. Deactivation plan has no completion date for purging and cleaning Line 3

1493-1

In the second paragraph on page 19 of 83 appears the following statement:

"As mandated by the Department of Justice Consent Decree, cleaning and purging of the existing Line 3 must begin within three months of the in-service date (ISD) for the Line 3 Replacement Project."

The following shortcomings are problematic:

- There is no mention of when the cleaning must be completed.
- There is no provision for verification that the work is done correctly.
- There are no penalties for failure to do the work correctly or to complete the work.

These shortcomings must be addressed by the PUC. The EIS would serve the public interest better if it drew the PUC's attention to this by stating it clearly.

3. Using cathode protection to mitigate the risk Line 3 becoming a water conduit

1493-2

Enbridge states it will mitigate the risk of Line 3 becoming a water conduit by maintaining cathodic protection (CP) indefinitely. By using CP to slow down the deterioration of Line 3, Enbridge hopes to delay the time when water will enter the pipeline. CP is an active system. It requires devices to create the current, cables to carry the current to the pipeline, and cables to carry the current from the pipeline to an anode field. Breaks in the pipeline must be bridged with electrical cables. Any, and all, of these components can and will fail.

Enbridge promises to maintain the CP for decades. Enbridge's track record suggests we should be very skeptical about this promise. Consider their performance during the Kalamazoo spill. Even though the stakes were very high, they failed to act for many hours while nearly a million gallons of crude oil spilled into the Kalamazoo River. The stakes involved with the ongoing maintenance of Line 3 are, in comparison, much lower.

If Enbridge fails to maintain the CP system, the pipeline will corrode sooner than if CP is maintained. In either case, they will lose no oil, pay no fines, nor fail to meet delivery schedules. If Enbridge does not maintain an operating and revenue-generating pipeline, how can we be asked to believe they will maintain an abandoned one?

The EIS must be modified to remind the PUC that it must include provisions to guarantee that Enbridge maintains the CP system. The maintenance requirements must be stated clearly, there must be a verification process, and there must be financial penalties in the event Enbridge fails.

4. Using segmentation to mitigate the risk Line 3 becoming a water conduit

The water conduit risk is described this way in Section 4.2.1 (page 19/83) of Appendix B:

"If the structural integrity of the pipeline is compromised, water and surrounding materials may infiltrate the pipe and have the potential of travelling downslope and exiting the pipe at another location. Water conduits may cause water migration to or from sensitive environmental features such as wetlands, watercourses, water supply areas such as aquifers, areas with sodic/saline or sandy soils, agricultural lands, and areas with a high water table."

Enbridge proposes to mitigate the water conduit risk by segmenting the abandoned pipe. Segmentation is the process of blocking the pipeline such that water cannot pass.

Pump stations and main line valves (MLV) are natural and obvious locations for segmentation. In both cases the pipeline rises above ground level which means segmentation can be accomplished without digging down to the pipeline, cutting it, welding plates on both openings, installing an electrical cable for CP, and then covering the pipe again.

Indeed, Enbridge proposes to use 7 pump stations and 40 MLVs as segmentation points. However, there is a difference in elevation of 640 feet along the 282 miles of Line 3 in Minnesota (see Table 4-1). Additional segmentation points may be needed. Enbridge describes what appears to be a truly sophisticated approach to determine if additional segmentation will be needed to protect the environment. The approach is described in sections 4.2.2.2.1 and 4.2.2.2.2 of their deactivation plan (page 22 of 83 of Appendix B).

Enbridge reaches the following conclusion (Section 4.2.2.4 of their deactivation plan (page 23 of 83 of Appendix B)):

"Based on the engineering assessment completed, 47 locations have been identified in the state of Minnesota for isolation (see Table 4-1). These 47 locations consist of the 40 mainline valves, 6 pump stations, and one co-located pump station/terminal within MN. There are three additional locations that have been identified as potential segmentation locations (items 8, 10 and 12 in Table 4-1) due to elevation changes and waterbody characteristics; these locations are currently being analyzed based on site specific factors (e.g., soil characteristics, topography, and hydraulic connectivity) and will be used as segmentation locations if determined that the water conduit effect poses a risk. Additionally, final isolation locations are subject to further refinement based upon the completion of the field assessment and detailed engineering and constructability review."

After all the data, scientific analysis, assessments, desk top reviews, computer assisted iterative modeling, topographical reliefs, hydraulic disconnections, and pipeline profile data, Enbridge can identify only 3 additional locations that will need segmentation! Worse yet, a careful reading of the text reveals that these locations are only being analyzed, and are "subject to further refinement based upon the completion of the field assessment and detailed engineering and constructability review", and

Enbridge will carry out segmentation at these points only "if determined that the water conduit effect poses a risk".

It is clear that Enbridge intends to segment the pipeline only in those locations where it can do so with little or no effort. This may or may not be adequate. What is objectionable is the appearance of a rigorous process that is more of a public relations stunt than a good faith effort to protect the environment. The elaborate description of an exhaustive process is a smokescreen whose purpose is to lull the public into a false sense of security. This exercise calls into question Enbridge's credibility and sincerity.

The final EIS must make it clear to the PUC that Enbridge must be obligated to segment the pipeline in all places where doing so will mitigate the risk of Line 3 becoming a water conduit. Enbridge's calculations must be verified by independent parties and the completion of the work must be enforceable by penalties and other legal remedies.

5. **The citation of "state and federal regulations" creates a false sense of security**

1493-3

Section 8.1 of the DEIS states: "As part of the Project, Enbridge proposes to abandon the existing Line 3, permanently removing it from service, following state[1] and federal[2] regulations, which outline the process and requirements for pipeline abandonment."

- The state laws that "outline the process and requirements for pipeline abandonment" are nothing more than the "Gopher State One Call" law that requires document retention for all abandoned underground utilities.
- Footnotes 3 and 4 of chapter 8 of the DEIS refer to CFR 192, but this must be a typographical error, as this law applies to natural gas pipelines.
- Footnotes 3 and 4 of chapter 8 of the DEIS refer to CFR 195, which does apply to pipelines for hazardous liquids, but mentions only reporting.

The idea that there is a set of state and federal laws that outline the process and requirements for environmentally sound pipeline abandonment is comforting. However, by citing laws that only require Enbridge to keep records of the location of an abandoned pipeline, the DEIS creates a false sense of security. If laws that outline the process and requirements for abandonment do exist, the EIS should bring them to the attention of the PUC. Only then can the PUC and the public begin to form an opinion as to whether the Enbridge deactivation plan satisfies those requirements.

6. **The overall impact of pipeline construction and decommissioning**

The first paragraph of Section 3.1 of the Enbridge Line 3 Permanent Deactivation Plan (U.S.), which can be found in Appendix B of the DEIS states:

"Pipeline removal would create impacts to the environment, land use, and public safety similar to a new pipeline project (commenter's emphasis). Environmental hazards associated with pipe removal are related to the disturbance of the soil, potential impacts to the groundwater, and potential impacts to human activities, natural wildlife and vegetation. Reduced soil stability during and after excavation can

also be a concern, as it can lead to increased localized erosion and destabilized slopes. These hazards may cause considerable disruption to ongoing and future land management activities. These risks increase significantly during a large-scale removal project. "

This statement can be taken to mean two, and only 2, things:

- *If meant literally*, Enbridge is telling us that pipeline construction activities are too destructive to the environment and too disruptive of human activities to be allowed. Thus, Line 3 Replacement ought NOT be constructed.
- *If <u>not</u> meant literally*, Enbridge is telling us that pipeline construction activities are inconvenient, but no more than that. Thus, if construction of a replacement for Line 3 is acceptable, then removal of existing Line 3 is also acceptable.

The EIS fails to address this contradiction. This shortcoming must be corrected.

1493-4

7. Quantity of timber mats needed to remove Line 3 exaggerated at least a hundred fold

The first paragraph on page 8 (page 13/83) of the Enbridge Line 3 Permanent Deactivation Plan (U.S.) states:

"Unlike the installation of a new pipeline (i.e., a pipeline installed as the outside pipe in a multi-pipe corridor), where crews can work over areas where there aren't active pipes underneath, the removal of a pipeline within a multi-pipe corridor necessitates the placement of timber mats over the active pipelines. The placement of these mats creates a working and travelling surface for large equipment to use when excavating and pulling out the abandoned pipe. Enbridge estimates approximately 600,000 – 900,000 mats would be required to safely remove Line 3 from the ground. Securing this volume of mats at one time may not be feasible."

Simple calculations indicate the suggested numbers of timber mats needed to remove line 3 are at least a hundred times greater than what is needed.

Enbridge's illustrations (Figure 3-1 on page 14 of 83 in Appendix B) suggests that each mat is approximately 10 feet square in size. Furthermore, the figures suggest the matting would be placed in 5 rows to create a protected area 50 feet wide. If you take the number of mats Enbridge claims it would need (600,000 to 900,000) and arrange them to form a 50 foot wide working space, the resulting space would be between 227 and 340 miles long. (The Minnesota part of Line 3 is only 282 miles long!)

The idea that a safe working space hundreds of miles long would be needed is preposterous. A more reasonable approach would be to create a work space 1000 feet in length, complete the removal operations, and then move the mats to the next area. If Enbridge chose such a method, a 1000 foot long work space could be formed with 500 timber mats. If Enbridge had 10 crews working this way, they would need 5000 mats.

The numbers Enbridge suggests (between 600,000 and 900,000 mats) appear to be a self-serving, gratuitous and disingenuous exaggeration whose purpose is to make an operation they prefer not to

undertake, seem impossible. Its inclusion in the EIS is a flaw that must be corrected. An independent and credible effort to assess the matter must be found and included in the EIS.

1493-4 Cont'd

1493-5

8. Heavy equipment cannot be operated in wetlands

The last paragraph on page 13/83 of the Enbridge Line 3 Permanent Deactivation Plan (U.S.) argues that existing line 3 should be abandoned in place because it will likely be impossible to operate heavy equipment in wetlands. This statement gives rise to the following observations:

- If it is indeed not safe to remove a pipeline from wetlands, that is not a valid reason to leave the pipe in place in areas that are not wetlands.
- If pipelines cannot be removed from wetlands, pipelines ought not be constructed through wetlands.
- How was it possible for Enbridge to build existing Line 3 in wetlands if it's not possible to operate heavy equipment in such terrain?

These contradictions in the Enbridge Line 3 Permanent Deactivation Plan need to be addressed. Its uncritical inclusion in the EIS is a flaw that must be corrected. The Enbridge plan must be complemented with reliable and independent study of the implications of abandonment.

Conclusion

It is difficult to know whether these shortcomings in Chapter 8 of the Draft Environmental Impact Statement are the result of inexperience, incompetence, or overreliance on material supplied by Enbridge. In any case, the DEIS fails in its role of informing the PUC and the public about the environmental impacts of the project and must be redrafted to address these shortcomings.

MINNESOTA

Comment Form
Line 3 Project Draft EIS Public Meeting

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

Name: S. Tyra

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City: Outing State: MN Zip Code: 56662

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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?

Concerns about both **cyber terrorism** and **physical acts of terrorism** abound in this day and age, and are not going away. Any acknowledgment of or plan to manage this potential for an environmental disaster is missing from the DEIS, with one exception.

- The **only** mention of terrorism (physical) in the DEIS is in Chapter 10 (*Accidental Crude Oil Releases*), section 1.2.2 and relates only to crude oil transport by rail – no mention at all of a plan by Enbridge to manage/handle a sophisticated cyber-attack with resulting "unanticipated releases" of crude oil from pipelines into the environment, possibly throughout the entire Enbridge operation. This is not implausible. When the federal government is worried about a nation-wide power grid cyber-attack, I have to believe that the interruption of an oil pipeline network would be an attractive target as well. What is Enbridge doing to "mitigate" this potential threat? 1933-1
- Physical acts of terrorism to a pipeline are a concern as well. A plane can be shot out of the sky – certainly a series of explosions can be coordinated to take out sections of underground pipeline causing massive spills. Set-up activities can be conducted relatively "in the dark" as rural area pipelines have low-ish populations and these destructive activities could go unnoticed. A physical attack does not necessarily mean terrorism, either – it could be pipeline vandalism or other criminal activity with unknown motivation to cause environmental damage. What is Enbridge doing to "mitigate" this potential threat? 1933-2

Another concern: Where is research regarding the potential for an earthquake to cause "unanticipated releases" from a pipeline? While not a major a concern here, we have had up to 10 recorded quakes, one with a magnitude of 4.6, several in the area where Enbridge wants to put Line #3. 1933-3

Enbridge has been held up BY THEIR PEERS IN THE INDUSTRY as an example of how NOT to run an energy delivery company. Why MN would consider allowing this company to expand their operation here is beyond me. If this goes through, MN officials should be ashamed, because the only reason Enbridge would be allowed to proceed is MONEY. Energy demand is down and will continue to decrease as the use of solar and wind energy is perfected and increases. Other energy delivery companies have ceased their operations in the tar sands areas. There is no reason to allow Line #3 to be built ... except one. (see above)

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