

April 14, 2022

Mr. Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
127 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

RE: EERA Comments and Recommendations on Application Completeness  
Dubuque-Twin Cities Pipeline Relocation for the Runway 2/20 Project  
**Docket No. IP-7057/PPL-21-266**

Dear Mr. Seuffert:

Attached are comments and recommendations of Minnesota Department of Commerce, Energy Environmental Review and Analysis (EERA) staff in the following matter:

In the Matter of the Application of BP Midwest Products Pipelines Holdings LLC  
for a Route Permit for the Dubuque-Twin Cities Pipeline Relocation for the Runway  
2/20 Project in the city of Rochester in Olmsted County

The route permit application was filed on March 29, 2022:

Jay Taylor Project Engineer 30 S. Wacker Drive Chicago, IL 60606 Phone: 312-809-3390 Email: <a href="mailto:Jay.Taylor@bp.com">Jay.Taylor@bp.com</a>	Brian Meloy Stinson LLP 50 South Sixth Street, Suite 2600 Minneapolis, MN 55402 Direct: 612-335-1451 Email: <a href="mailto:Brian.Meloy@stinson.com">Brian.Meloy@stinson.com</a>
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EERA recommends the Minnesota Public Utilities Commission (Commission) accept the application as complete.

Staff is available to answer any questions the Commission might have.

Sincerely,

*/s/ Larry B. Hartman*

Energy Environmental Review and Analysis

c: Louise Miltich, EERA  
Bret Eknes, Commission EFP Supervisor  
Cezar Panait, Commission staff

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## BEFORE THE PUBLIC UTILITIES COMMISSION

### ENERGY ENVIRONMENTAL REVIEW AND ANALYSIS COMMENTS AND RECOMMENDATIONS

#### BP Pipeline Relocation Project

*Docket No. IP-7057/PPL-21-266*

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**Date:** April 14, 2022

**Staff:** Larry Hartman | [larry.hartman@state.mn.us](mailto:larry.hartman@state.mn.us) | (651) 539-1840

**Issues Addressed:** These comments and recommendations address the completeness of the route permit application submitted for the project, and the presence of disputed issues.

**Attachments and Figures:** Figure 1 Pipeline Relocation Overview, Figure 2 Project Area Overview, Figure 3 Preferred Route Detail, Attachment 1 Partial Exemption Pipeline Flowchart, Attachment 2 Application Completeness Checklists

Additional documents and information, including the route permit, can be found on eDockets by searching “21” for year and “266” for number: <https://www.edockets.state.mn.us/EFiling/search.jsp>.

This document can be made available in alternative formats, that is, large print or audio, by calling (651) 539-1530 (voice).

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## Introduction and Background

On March 29, 2022, BP Midwest Product Pipeline Holdings LLC (“BP” or “Applicant”), filed a Route Permit Application under the partial exemption procedures (Minnesota Rule 7852.0600) to remove approximately 5,995 feet of an existing 10-inch-diameter, steel finished products (gasoline and diesel fuel) pipeline and relocate the pipeline outside of airport property with a new pipeline approximately 10,171 feet in length between Mile Post (MP) 347.50 to 348.60.<sup>1</sup> The pipeline relocation is necessary to accommodate an extension of the 2/20 Runway at the Rochester International Airport owned by the city in Olmsted County.

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<sup>1</sup>BP Midwest Product Pipelines Holding LLC (BP), Application to the Minnesota Public Utilities Commission for a Route Permit for the Dubuque-Twin Cities Pipeline Relocation for the Runway 2/20 Project – Uninterrupted Service, Rochester International Airport, March 29, 2022 See eDockets, Document ID No’s. ([Cover Letter & Application Text \(20223-184190-01\)](#), [Figures \(20223-184190-02\)](#), [Exhibit B – Engineering Plans \(20223-184190-03\)](#) & [20223-184190-04](#), [Exhibit C – Safety Data Sheets \(20223-184190-05\)](#), [Exhibit B – Agricultural Mitigation Plan \(20223-184190-06\)](#) and [Letter from Mayor of Rochester \(20223-184190-07\)](#)).

On April 4, 2022, the Minnesota Public Utilities Commission (Commission) issued a notice soliciting comments on the following topics:

- Does the route permit application contain the information required under Minn. R. 7852.2100 to 7852.3100?
- Should the Commission accept the application as complete to begin the review process?
- Are there any contested issues of fact with respect to the representations made in the route permit application?
- Are there other issues or concerns related to this matter?<sup>2</sup>

### Project Purpose

BP Midwest Product Pipelines Holdings LLC (BPMW), a Delaware limited liability company, is relocating a portion of the 10-inch-diameter, steel finished products (gasoline and diesel) pipeline in Olmsted County, MN to accommodate a runway expansion project at the Rochester International Airport [Federal Aviation Administration (FAA) identifier (RST)] (Airport or RST) and to satisfy federal grant assurance requirements that require clear title on lands acquired by federally funded projects.

The Airport is in the City of Rochester (City). In March 2019, the FAA designated crosswind Runway 2/20 as a secondary runway due to the paramount need for reliable medical access to RST related to health care provided by Mayo Clinic. To continue safe and efficient operation of RST, the Airport identified a plan to reconstruct and extend RST's north-south runway, Runway 2/20, while maintaining uninterrupted service. Runway 2/20 is 7,301 feet long and 150 feet wide. Runway 2/20 has an approximately three-quarter-length parallel taxiway, 60 feet wide, to the west and seven connector taxiways.<sup>3</sup>

BP is proposing to relocate 10,171 feet of their pipeline outside of RST property. The project is being conducted in response to FAA's runway expansion project at the Airport to conform to runway line of sight requirements. The 10-inch diameter steel pipeline will be installed to a depth which provides a minimum depth of cover of 4.5 feet. The pipeline is currently used in the transportation of gasoline and diesel and will continue to transport these petroleum products following the relocation. There will be no change in pipeline operations following the proposed pipeline reroute.<sup>4</sup>

### Project Location

BP's existing Dubuque-Twin Cities pipeline runs in a southeast to northwest direction approximately 615 feet southwest of the Runway 2 threshold and within the footprint of the Runway 2 extension. The Preferred Route is located outside the Airport property, in the

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<sup>2</sup> Notice of Comment Period, April 4, 2022, See eDockets No. [20224-184397-01](#).

<sup>3</sup> Application Text ([20223-184190-01](#)), p. xi.

<sup>4</sup> Application Text ([20223-184190-01](#)), p. 2.

Southwest ¼ of Section 16, and Northwest, Southwest, and Southeast ¼'s of Section 21, Township 105N, Range 14W in High Forest Township in Olmsted County.<sup>5</sup>

BPMW holds a blanket easement (i.e., an encumbrance that covers the entire parcel), over the RST Project parcel where the existing pipeline is located. The FAA's runway safety area (RSA) design standards require the area to be free of objects, except for objects that need to be in the RSA because of their function; therefore, the pipeline cannot remain within the RSA, and must be relocated. In addition, current federal grant assurances prohibit agreements in which the Airport's property interest is subordinate to another entity on lands purchased with federal funds. For the pipeline to remain on RST Project property, the Airport and BPMW would need to execute a subordination agreement, with BPMW's interest being subordinate to the Airport. This arrangement was not agreeable to both parties. As a result, BPMW's rights in the project runway area are to be released, and the pipeline relocated, to maintain compliance with federal grant assurance requirements.<sup>6</sup>

A 1,716-foot segment of the existing Dubuque-Twin Cities pipeline is located within the existing RSA and ROFA of Runway 2. The pipeline is a batch purpose line that traverses southern Minnesota via Dubuque, Iowa, and terminates approximately 80 miles north of RST at the NuStar Energy Terminal in Roseville, MN. The pipeline does not provide service to RST and was installed prior to the establishment of the Airport.<sup>7</sup>

The relocated pipeline will be completely outside future Airport property while minimizing impacts to three impacted landowners. BPMW holds existing blanket easements over properties owned by two of these impacted landowners. BPMW will be completing the combination of the following: acquiring new easements, modifying existing easements and releasing easements.<sup>8</sup>

The pipeline relocation will take place between MP 347.50 and MP 348.60 within High Forest Township. From its departure and tie-in point on the southern end, the relocated pipeline will travel northwest for approximately 750 feet adjacent to the existing pipeline and then turn west for approximately 2,210 feet, crossing 31st Avenue SW, then turn southwest for approximately 750 feet, then turn northwest for approximately 1,800 feet, crossing 95th Street SW, then turn north for approximately 260 feet, then turn northeast for approximately 1,650 feet, and then turn north for approximately 1,000 feet crossing 90th Street SW, and then turn northeast for approximately 1,750 feet where it will reconnect with the existing pipeline. The relocated pipeline will remain in the Township, Range and Sections detailed above.<sup>9</sup> The engineering plans for the Preferred Route are provided in the application (**Exhibit B: Engineering Plans (20223-184190-03)**).

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<sup>5</sup> Application Text ([20223-184190-01](#)), p. 2.

<sup>6</sup> Application Text ([20223-184190-01](#)), p. 2.

<sup>7</sup> Application Text ([20223-184190-01](#)), p. 2.

<sup>8</sup> Application Text ([20223-184190-01](#)), p. 2.

<sup>9</sup> Application Text ([20223-184190-01](#)), p. 2

## Project Description

The proposed pipeline will include installation of approximately 10,171-feet of 10.750-inch outside diameter steel pipeline (Grade X-42) with a 0.365-inch wall thickness for line pipe and 0.500-inches for pipe used for road crossings.<sup>10</sup>

The maximum allowable operating pressure (MAOP) for this portion of the pipeline is 1,303 psig. The nominal operation pressure is 515 psig. There are no plans to change the existing operating pressure.<sup>11</sup>

## Associated Facilities

No major above-ground facilities will be installed with the proposed project. Pipeline markers will be installed at road crossings in accordance with applicable federal and state regulations. BPMW plans to install test stations at road crossings to monitor cathodic protection. Alternating current mitigation and other cathodic protection facilities may be installed at a future date as warranted by a cathodic protection study to be conducted after construction. Cathodic protection and alternating current mitigation would include non-conductive ground mats and grounding rods. Cathodic protection for the pipeline will be provided by sacrificial anodes buried along the route.<sup>12</sup>

At the tie-in locations, depicted as TP-1 and TP-2 on the engineering plans (Exhibit B, there are larger limits of disturbance. This will allow for the outage, drain-down, and tie-in scope associated with tying in the new line to the existing line. In this area there are plans to have a temporary pig launcher and receiver, temporary above grade storage tanks, above grade temporary piping, and construction equipment and vehicles.<sup>13</sup>

Associated facilities include an additional 4.867 acres which be utilized for the contractor pipe lay down area. This additional temporary workspace (ATWS) is located south of 90<sup>th</sup> Street SW and illustrated in **Figure 2**.<sup>14</sup>

All equipment associated with the ATWS will be removed from the area upon completion of the project.<sup>15</sup>

## Land and Right-Of-Way Requirements

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<sup>10</sup> Application Text ([20223-184190-01](#)), p. 4.

<sup>11</sup> Application Text ([20223-184190-01](#)), p. 4.

<sup>12</sup> Application Text ([20223-184190-01](#)), p.4-5.

<sup>13</sup> Application Text ([20223-184190-01](#)), p.4-5.

<sup>14</sup> Application Text ([20223-184190-01](#)), p.4-5.

<sup>15</sup> Application Text ([20223-184190-01](#)), p.4-5.

BP is requesting Commission approval for a Preferred Route with a width of 200 feet, for the length of the pipeline replacement (10,171 feet) for a total acreage of 46.7 acres. The permanent ROW easement will be 10,171 feet in length and 50 feet in width for a total estimated acreage of 11.67 acres.<sup>16</sup>

Additional temporary workspace (ATWS) will be required at the southern tie-in, which will consist of an area of disturbance of 275 feet by 283 feet, for an estimated 1.79 acres, and a similar area around the northern tie-in of 275 feet by 283 feet for an estimated 1.79 acres. An additional 4.867 acres will be utilized for the contractor pipe lay down area south of 90<sup>th</sup> Street SW. ATWS is illustrated in **Figure 2**.<sup>17</sup>

BPMW is estimating a ditch depth of 7 feet and width of 5 feet. The excavated volume of soil is estimated at 13,185 cubic yards. To meet the requirements set forth in USDOT pipeline standards 49 CFR Part 195.248, and to be consistent with Minnesota Statute 216G.07, Subdivision 1, the depth of cover over the pipeline will be a minimum 4.5 feet. The Land Type Associations and Topography maps are illustrated in **Figure 3** and **Figure 4**, respectively and detailed in **Table 1** below.<sup>18</sup>

**Table 1**  
**Anticipated Land Requirements**

Preferred Route	Description	Permanent ROW (acres)	Preferred Route and ATWS (acres)	Total Land Requirements (acres)
		New ROW		
<b>East-West Segment of Pipeline - South of Runway 2/20</b>	Where the Preferred Route will be located south of Runway 2/20, from I-90 to 95 <sup>th</sup> Street SW.	6.35 (upland)	19.21 (upland)	25.56 (upland)
		0.17 (wetland)	0.34 (wetland)	0.51 (wetland)
<b>South-North Segment of Pipeline - West of Runway 2/20</b>	Where the Preferred Route will be located from 95 <sup>th</sup> Street SW, north along the west side of Runway 2/20.	5.06 (upland)	15.27 (upland)	20.33 (upland)
		0.11 (wetland)	0.24 (wetland)	0.35 (wetland)

<sup>16</sup> Application Text ([20223-184190-01](#)), p.4-5.

<sup>17</sup> Application Text ([20223-184190-01](#)), p.4-5.

<sup>18</sup> Application Text ([20223-184190-01](#)), p.4-5

The proposed cover amounts meet the requirements set forth in state (Minn. Stat. 216G.07, Subd. 1) and federal standards (Department of Transportation 49 CFR Part 192.327). Minnesota statute requires the proposed pipeline to be buried with a minimum level cover of not less than 4.5 feet (54-inches) in all areas where the pipeline alignment crosses public drainage facilities, county, or state highway rights-of-way, and actively cultivated agricultural lands. The proposed pipeline relocation does not parallel any other rights-of-way

The Project is expected to cost approximately \$12,500,000 million.<sup>19</sup>

## Regulatory Process and Procedures

In Minnesota, no person may construct a pipeline designed to transport natural gas at a pressure of more than 275 pounds per square inch (psi) without first obtaining a route permit from the commission,<sup>20</sup> unless the pipeline is excluded or exempted from the commission's routing authority.<sup>21</sup> The proposed project is designed to operate at a nominal pressure of 515 psig. As a result, the proposed project requires a route permit from the commission.

The pipeline routing permit requirements are outlined in Minnesota Rules, chapter 7852. If the applicant does not expect the proposed pipeline and associated facilities to have significant impacts on humans or the environment, they can apply for a partial exemption from pipeline route selection procedures, as provided for in Minnesota Rules, part 7852.0600, described below and illustrated in **Attachment 1 - Partial Exemption Process**.

Minnesota Statute 216G.02 Subdivision 3(b) (8) requires the commission to decide whether to grant or deny the partial exemption within 90 days after commission acceptance of the partial exemption application.

The commission shall conduct a public information meeting in each county in which the pipeline and associated facilities are proposed to be located. The purpose of the public information meeting(s) is to assist the commission in determining whether to grant or deny the partial exemption.

A person may file comments with the commission stating reasons why the commission should grant or deny the partial exemption.

In deciding whether to grant or deny the partial exemption, the commission shall consider any comments that are filed, the record of the public information meeting(s), and the information contained in the application relevant to the criteria for partial exemption in Minnesota Rules, part 7852.0700.

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<sup>19</sup> Application Text ([20223-184190-01](#)), p.3.

<sup>20</sup> Minnesota Statute [216G.02](#), subdivision 1.

<sup>21</sup> Minn. Stat. [216G.02](#), subd. 3(b)(7), Minnesota Rule [7852.0300](#).



If the commission does not grant the partial exemption, the applicant may (re)apply for review pursuant to the Pipeline Route Selection Procedures of Minnesota Rules, parts 7852.0600, and 7852.2100 to 7852.3100.

Pursuant to Minnesota Statutes 216E.10, subdivision 3(b), an applicant for a permit under chapter 216G will notify the Commissioner of Agriculture if the proposed project will impact cultivated agricultural land. The Department of Agriculture shall be the lead agency on the development of any agricultural mitigation plan required for the project.

### Route Permit Application and Acceptance

The applicant is seeking review under the partial exemption procedures. These procedures are outlined in Minnesota Rules 7852.0600 [Exemption from Route Selection Procedures], and 7852.2100 to 7852.300 [Application Contents].

Applicants must submit a route permit application consistent with the filing requirements of Minnesota Rule 7852.2000. The application must contain the information required in Minnesota Rules 7852.2100 to 7852.3000. This includes, but is not limited to, applicant information, route description, proposed pipeline and associated facilities description, and potential environmental impacts and mitigation measures. The applicant must identify a preferred route.<sup>22</sup>

Upon receiving a route permit application for a pipeline, the commission may accept it as complete, accept it as complete upon filing of supplemental information, or reject it and require that additional information be submitted.<sup>23</sup> After acceptance of the application, the applicant must provide any additional relevant information the commission considers necessary to process the application.<sup>24</sup> If the Commission determines that a route permit application is complete, the review process begins.

The commission is required to decide within 90 days from the date an application is accepted.<sup>25</sup>

### EERA Staff Analysis and Comments

EERA staff participated in pre-filing discussions with the applicant, as well as provided numerous comments on drafts of the route permit application. Subsequently, EERA staff conducted a completeness review of the Dubuque-Twin Cities Pipeline Relocation Project for the Rochester Airport Pine Project route permit application, which was filed on March 29, 2022, relative to the application content requirements specified in Minnesota Rules 7852.2100 to 7852.3000. **Attachment 2 – Completeness Checklist.**

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<sup>22</sup> Minn. Stat. [216G.02](#), subd. 3(b)(1), Minn. R. [7852.2200](#).

<sup>23</sup> Minn. R. [7852.2000](#), subp. 4.

<sup>24</sup> Minn. R. [7852.2000](#), subp. 4.

<sup>25</sup> Minn. Stat. [216G.02](#), subd. 3(b)(8).

EERA staff believes that the filed application meets the content requirements of Minnesota Rules 7852.2100 to 7852.3000 and, therefore, is substantially complete.

### **Disputed Issues of Fact**

EERA is not aware of any disputed issues of fact. Staff believes that any issues that surface may be addressed through the partial exemption review process.

### **Project Budget**

Minnesota Rule 7852.4000 requires an application fee to cover actual costs necessarily and reasonably incurred in processing an application for a pipeline route permit, permit compliance activities, administrative overhead, legal and other expenses.

EERA has included staff time, travel, commission, and attorney general fees in developing an initial budget estimate. EERA requests the commission approve a budget of up to \$50,000. EERA staff believes this estimate will cover all actual costs associated with commission review of this project; however, this initial estimate may change during administrative review.

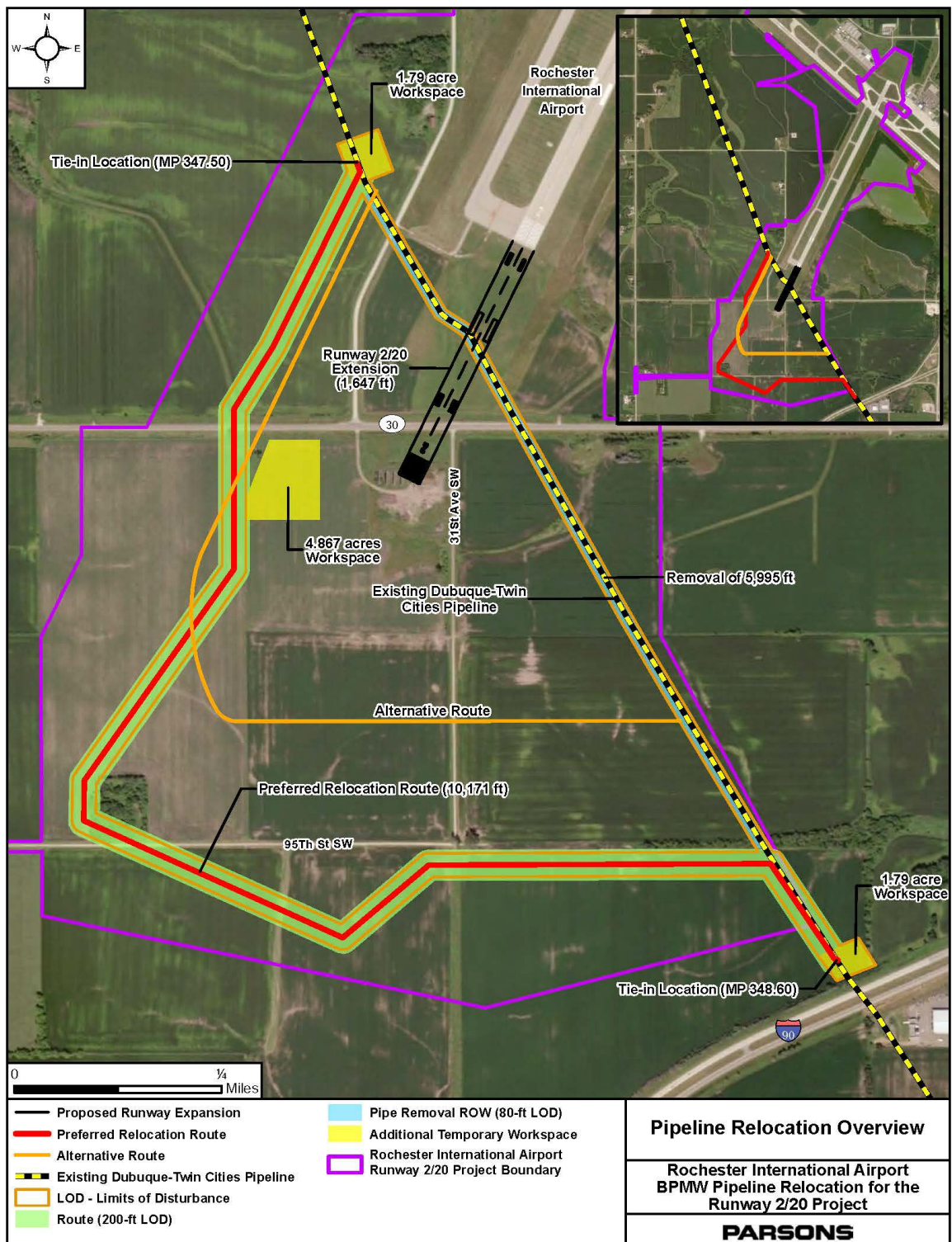
The rules require that the project budget be reviewed with the applicant and approved by the commission. The proposed project budget was discussed with the applicant prior to application filing on March 29, 2022. An accounting of all expenditures will be provided to the applicant and the applicant may present objections to the commission. Any unspent funds will be returned to the applicant.

### **EERA Staff Recommendation**

EERA staff recommends that the Commission accept the route permit application for the Rochester Pipeline Relocation Project as complete.

Additionally, EERA staff recommends that the Commission approve of the proposed project budget of \$50,000.

Figure 1 Pipeline Relocation Overview



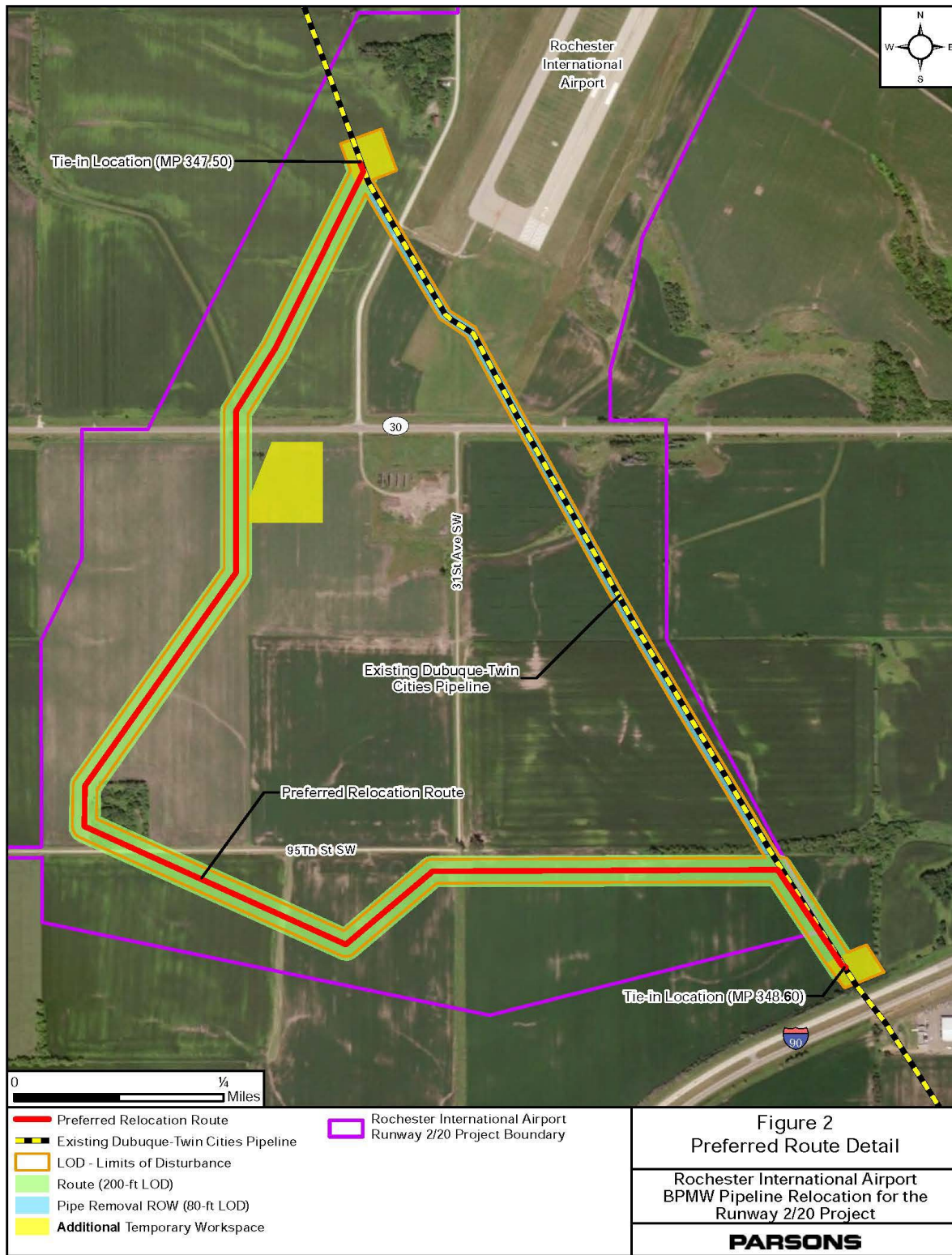


**Figure 1**  
Project Area Overview

Rochester International Airport  
BPMW Pipeline Relocation for the  
Runway 2/20 Project

**PARSONS**

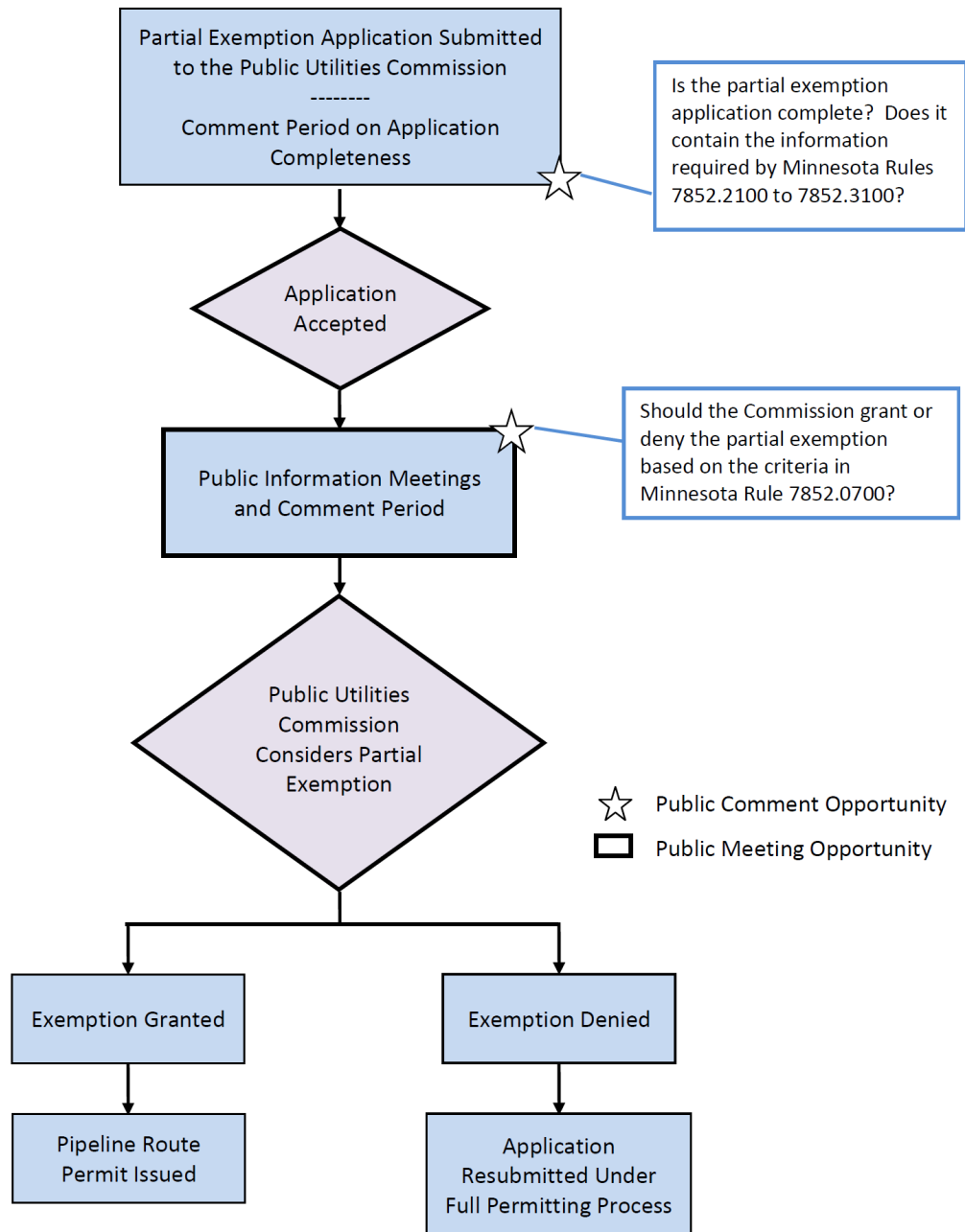
Figure 3 Preferred Route Detail





## Attachment 1 Partial Exemption Process

### Pipeline Routing Flowchart Partial Exemption Process Minnesota Rules 7852



## Attachment 2 Application Completeness Checklist

### ***Minnesota Rule 7852.0600 Application Procedures and Requirements***

A person submitting an application for a pipeline routing permit must comply with the application procedures of part 7852.0600 and submit an application that contains the information required in parts 7852.2100 to 7852.3000.

Minnesota Rules	Description of Requirement	Page
<b>7852.2100. GENERAL INFORMATION.</b>		
Subpart 1.	<b><u>Cover letter:</u></b> Each application must be accompanied by a cover letter signed by an authorized representative or agent of the applicant. The cover letter must specify the type, size, and general characteristics of the pipeline for which an application is submitted.	Yes
Subpart 2.	<b><u>Title page and table of contents:</u></b> Each application must contain a title page and a complete table of contents.	Yes
Subpart 3.	<b><u>Statement of ownership:</u></b> Each application must include a statement of proposed ownership of the pipeline as of the day of filing and an affidavit authorizing the applicant to act on behalf of those planning to participate in the pipeline project.	1
Subpart 4.	<b><u>Background information:</u></b> Each application must contain the following information: A. The applicant's complete name, address, and telephone number; B. The complete, name, title, address, and telephone number of the authorized representative or agent to be contacted concerning the applicant's filing; C. The signatures and titles of persons authorized to sign the application, and the signature of the preparer of the application if prepared by an outside representative or agent; and D. A brief description of the proposed project which includes: 1. General location; 2. Planned use and purpose; 3. Estimated cost; 4. Planned in-service date; and 5. General design and operational specifications for the type of pipeline for	1-3
<b>7852.2200. PROPOSED PIPELINE AND ASSOCIATED FACILITIES DESCRIPTION.</b>		
Subpart 1.	<b><u>Pipeline design specifications:</u></b> The specifications for pipeline design and construction are assumed to be in compliance with all applicable state and federal rules or regulations unless determined otherwise by the state or federal agency having jurisdiction over the enforcement of such rules or regulations. For public information purposes, the anticipated pipeline design specifications must include but are not limited to: A. Pipe size (outside diameter) in inches; B. Pipe type; C. Nominal wall thickness in inches;	4

Minnesota Rules	Description of Requirement	Page
	D. Pipe design factor; E. longitudinal or seam joint factor; F. class location and requirements, where applicable; G. Specified minimum yield strength in pounds per square inch; and H. Tensile strength in pounds per square inch.	
Subpart 2.	<b><u>Operating pressure:</u></b> Operating pressure must include: A. Operating pressure (pounds per square inch gauge [psig]); and B. Maximum allowable operating pressure (psig).	4
Subpart 3.	<b><u>Description of associated facilities:</u></b> For public information purposes, the applicant shall provide a general description of all pertinent associated facilities on the right-of-way.	4
Subpart 4.	<b><u>Product capacity information:</u></b> The applicant shall provide information on planned minimum and maximum design capacity or throughput in the appropriate unit of measure for the types of product shipped as defined in part	5
Subpart 5.	<b><u>Product description:</u></b> The applicant shall provide a complete listing of products the pipeline is intended to ship and a list of products the pipeline is designed to transport, if different from those intended for shipping.	5
Subpart 6.	<b><u>Material safety data sheet:</u></b> For each type of product that will be shipped through the pipeline, the applicant shall provide for public information purposes the material identification, ingredients, physical data, fire and explosive data, reactivity data, occupational exposure limits, health information, emergency and first aid procedures, transportation requirements, and other known regulatory	5 & Exhibit C
<b>7852.2300. LAND REQUIREMENTS.</b>		
For the proposed pipeline, the applicant shall provide the following information: A. Permanent right-of-way length, average width, and estimated acreage; B. Temporary right-of-way (workspace) length, estimated width, and estimated acreage; C. Estimated range of minimum trench or ditch dimensions including bottom width, top width, depth, and cubic yards of dirt excavated; D. Minimum depth of cover for state and federal requirements; and E. Right-of-way sharing or paralleling: type of facility in the right-of-way, and the estimated length, width, and acreage of the right-of-way.		6
<b>7852.2400. PROJECT EXPANSION.</b>		
If the pipeline and associated facilities are designed for expansion in the future, the applicant shall provide a description of how the proposed pipeline and associated facilities may be expanded by looping, by additional compressor and pump stations, or by other available methods		7
<b>7852.2500. RIGHT-OF-WAY PREPARATION PROCEDURES AND CONSTRUCTION ACTIVITY SEQUENCE.</b>		
Each applicant shall provide a description of the general right-of-way preparation procedures and construction activity sequence anticipated for the proposed pipeline and associated facilities.		8-11



Minnesota Rules	Description of Requirement	Page
<b>7852.2600. PREFERRED ROUTE LOCATION; ENVIRONMENTAL DESCRIPTION.</b>		
Subpart 1.	<b><u>Preferred route location:</u></b> The applicant must identify the Preferred Route for the proposed pipeline and associated facilities on any of the following documents, which must be submitted with the application: A. United States Geological Survey topographical maps to the scale of 1:24,000, if available; B. Minnesota Department of Transportation county highway maps; or C. Aerial photos or other appropriate maps of equal or greater detail in items A and B. The maps or photos may be reduced for inclusion in the application. One full-sized set shall be provided to the Commission.	12 & Figures 1-13
Subpart 2.	<b><u>Other route locations:</u></b> All other route alternatives considered by the applicant must be identified on a separate map or aerial photos or set of maps and photos or identified in correspondence or other documents evidencing consideration of the route by the applicant.	11 & Figure 5
Subpart 3.	<b><u>Description of environment:</u></b> The applicant must provide a description of the existing environment along the Preferred Route.	12-21
<b>7852.2700. ENVIRONMENTAL IMPACT OF PREFERRED ROUTE.</b>		
The applicant must also submit to the Commission along with the application and analysis of the potential human and environmental impacts that may be expected from pipeline right-of-way preparation and construction practices and operation and maintenance procedures. These impacts include but are not limited to the impacts for which criteria are specified in part 7852.0700 or 7852.1900.		22 - 31
<b>7852.2800. RIGHT-OF-WAY PROTECTION AND RESTORATION MEASURES.</b>		
Subpart 1.	<b><u>Protection:</u></b> The applicant must describe what measures will be taken to protect the right-of-way or mitigate the adverse impacts of right-of-way preparation, pipeline construction, and operation and maintenance on the human and natural	32
Subpart 2.	<b><u>Restoration:</u></b> The applicant must describe what measures will be taken to restore the right-of-way and other areas adversely affected by construction of the pipeline.	33
<b>7852.2900. OPERATION AND MAINTENANCE.</b>		
Pipeline operations and maintenance are assumed to be in compliance with all applicable state and federal rules or regulations, unless determined otherwise by the state or federal agency having jurisdiction over the enforcement of such rules or regulations. For public information purposes, the applicant must provide a general description of the anticipated operation and maintenance practices planned for the proposed pipeline.		34
<b>7852.3000. LIST OF GOVERNMENT AGENCIES AND PERMITS.</b>		
Each application must contain a list of all the known federal, state, and local agencies or authorities and titles of the permits they issue that are required for the proposed pipeline and associated facilities.		35