



Heartland Corn Products

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February 12, 2026

Via Electronic Filing

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St Paul, MN 55101

Re: *In the Matter of the Application of Heartland Corn Products for a Route Permit for the Heartland Corn Natural Gas Pipeline Project in Sibley County*
Docket No. IP-7108/GP-23-43

Dear Ms. Bergman:

Heartland Corn Products (“HCP”) respectfully files these Reply Comments pursuant to the Minnesota Public Utility Commission’s (“Commission”) December 12, 2025 Notice of Comment Period on Request for Pipeline Construction Completion Certification for the Heartland Corn Natural Gas Pipeline Project (“Project”). HCP recently became aware that, although it did not receive notification through eDockets, a single comment was filed during the Initial Comment period by Winthrop resident Mr. Dale Malheim.¹ HCP apologizes for the delay in filing these Reply Comments and respectfully requests the Commission consider them in evaluating whether to accept HCP’s completion certification.

Although HCP appreciates Mr. Malheim’s ongoing interest in the Project,² HCP does not believe that his comments accurately reflect the Project or justify rejecting the Project’s certification. As a threshold matter, they do not call into question that “the construction and remediation of the permitted pipeline has been completed in compliance with all permit conditions and landowner agreements”—the standard for certification under HCP’s permit (Permit Section 16) and Minn. R. 7852.3900. As certified in HCP’s August 16, 2025 Section 16 Compliance Filing, “there are no unresolved complaints related to HCP’s construction or restoration activities associated with the

¹ See eDockets ID No. [202512-225921-01](#).

² Mr. Malheim has submitted oral and written comments throughout this proceeding, including proposing an alternative route that the Commission ultimately did not adopt. See, e.g., HCP’s July 13, 2023 Response Comments (eDockets ID No. [20237-197473-01](#)), at 5–6; EERA Staff Comments and Recommendations, as adopted by the Commission’s October 27, 2023 Order Granting Partial Exemption and Issuing Route Permit (eDockets ID No. [202310-199931-01](#)), at 5, 12.

HCP Pipeline Project. . . . [and] HCP has met the conditions in the pipeline easements and is current on the easement compensation payments.”³

To the extent Mr. Malheim’s comments suggest that additional easements or compensation are required, that suggestion is misplaced. As discussed in HCP’s prior Response Comments and Application, HCP secured all property rights necessary to install and operate the Project through voluntary negotiation with landowners for easement option agreements.⁴ HCP exercised those options prior to Project construction, and the relevant easements have been recorded in the Sibley County Recorder’s Office. All property owners whose rights have been affected by the Project have entered into an agreement with HCP and received compensation. HCP has received no complaints—whether related to restoration, compensation, or otherwise—from landowners that granted such easements.

Although the Project pipeline and right-of-way are located adjacent to Mr. Malheim’s property, they do not traverse any portion of his property and do not impact his property rights, and HCP does not require or intend to request access to or use of Mr. Malheim’s property. HCP’s operating partner, the Hutchison Utilities Commission (“HUC”), has responded to utility locate requests near Mr. Malheim’s property, which were processed through Gopher State One Call. HUC has marked the Project consistent with HUC’s operating policies, which are on file with the Minnesota Office of Pipeline Safety, and applicable regulations. HUC has utilized Project easements to access areas for marking, marked only within the Project easements, and has not accessed Mr. Malheim’s property while marking the Project.

HCP will continue to operate and maintain the pipeline through use of existing Project easements and respectfully requests that the Commission accept HCP’s completion certification. HCP appreciates the Commission’s attention to this filing and again apologizes for any inconvenience HCP’s delay may have caused. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'T. Patrick', with a stylized flourish at the end.

Tom Patrick
Heartland Corn Products
Chief Executive Officer

³ See eDockets ID No. [20258-222222-01](#).

⁴ See HCP’s July 13, 2023 Response Comments (eDockets ID No. [20237-197473-01](#)), at 6; HCP’s Application for a Pipeline Route Permit (eDockets ID Nos. [20234-194503-01](#) to [20234-194503-08](#)), at 7, 14.