

June 7, 2019

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

**Re: *Enbridge Responses to the Minnesota Public Utility Commission's Information Request Nos. 1-9 Regarding Enbridge's Application for Approval of Route Width Variations and Permit Amendment***

**In the Matter of the Application of Enbridge Energy, Limited Partnership for a Pipeline Route Permit for the Line 3 Replacement Project in Minnesota from the North Dakota Border to the Wisconsin Border  
MPUC Docket No. PL-9/PPL-15-137**

Dear Mr. Wolf:

Enclosed please find Enbridge Energy, Limited Partnership's ("Enbridge") Responses to the Minnesota Public Utility Commission's Information Requests Nos.1 through 9 which have been e-filed today on behalf of Enbridge through [www.edockets.state.mn.us](http://www.edockets.state.mn.us).

A copy of this filing is also being served upon the persons on the Official Service List of record. Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ *Christina K. Brusven*

Christina K. Brusven  
*Attorney at Law*  
**Direct Dial:** 612.492.7412  
**Email:** cbrusven@fredlaw.com

66939178.1

Attorneys & Advisors  
main 612.492.7000  
fax 612.492.7077  
[www.fredlaw.com](http://www.fredlaw.com)

Fredrikson & Byron, P.A.  
200 South Sixth Street, Suite 4000  
Minneapolis, Minnesota  
55402-1425

**State of Minnesota  
Public Utilities Commission  
Information Request**

Docket Number: PL9/PPL-15-137

Date of Request: 05/31/2019

Requested From: Enbridge Energy, Limited Partnership

Response Due: 06/07/2019

Type of Inquiry: Other

Requested By: Scott Ek

Email Address: scott.ek@state.mn.us

Phone Number: 651-201-2255

**Request Number: 1**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** What is the width(s) of the deviated temporary workspace that surrounds the modified pipeline rights-of-way proposed to be located outside the designated 700-foot-wide route, specifically modifications 1, 3, 5, 6, 12, 13, and 16?

**Response:**

Modification #	Approx Milepost	Width (Ft)
1	828	1817
2	865	790
3	915	1037
4	925	957
5	927	1336
6	931	1593
7	952.5	1335
8	994	770
9	1019	828
10	1054	2220
11	1062	831
12	1073	1130
13	1095	1217
14	1105	771
15	1110	797
16	1117	1542
17	1120	2663

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**Request Number: 2**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** Modification No. 4 is described as “impacting county road right-of-way,” “adjacent to a roadway,” or “contained within the road right-of-way.” Please clarify whether the modification utilizes a county road right-of-way or is on land adjacent to a county road right-of-way.

Enbridge indicates no additional private lands are required for the modification because it is adjacent to a roadway, but also explains it is within road right-of-way. If within road right-of-way, please provide verification that Clearwater County does not have any concerns with the use of the road right-of-way?

Please explain why no new permits are required for this modification, if this modification is indeed within county road right-of-way?

Has Enbridge acquired land rights needed for this modification?

Is this modification for temporary workspace or will there be permanent pipeline facilities located within the modification?

**RESPONSE:** Modification No. 4 facilitates installation of a permanent cathodic protection (CP) bed. The CP bed is entirely within road right of way. Enbridge has received a permit from Clearwater County for this purpose, and no other land rights are needed. No new permits are required for this modification because the previous design also required a permit from Clearwater County for facilities in the road right of way; this modification simply extends the planned CP bed.

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**Request Number: 3**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** Is Modification No. 9 for temporary workspace or will there be permanent pipeline facilities located within the modification?

**Response:** Modification No. 9 is requested for permanent pipeline facilities. A cathodic protection (CP) bed is being place at this location, and the CP bed extends beyond the existing PUC Designated Route. The parcel affected was purchased in fee by Enbridge on June 27, 2014, and all workspace needed for the CP Bed is contained within the Enbridge-owned parcel (tract MN-CA-C5-069.100).

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**Request Number: 4**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** Modification No. 10 is described as requiring land for temporary and permanent workspace for the pump station. The term “permanent workspace” is not defined in the pipeline routing permit. Please clarify what is meant by “permanent workspace.”

Please provide additional details on the transmission line that is proposed to be constructed (*i.e.*, responsible government unit, required permits, and review).

**Response:**

“Permanent workspace” was intended to refer to “permanent right of way” as described in Section 3.1 of the Route Permit. Enbridge purchased in fee all affected parcels on June 3, 2019. The additional workspace needed for this modification is entirely on Enbridge owned parcels.

Enbridge has requested new transmission service from Great River Energy (GRE) for the proposed Swatara Pump Station. This transmission tap will be supplied from the 230kV transmission line that traverses the parcel on which the proposed pump station will be constructed. Aitkin County has confirmed that there is no local permitting requirement for GRE’s 230-kV tap line serving the proposed Swatara Pump Station. The transmission line will be a 230-kV tap line approximately 1200 feet in length that serves a single customer. As such, it is considered an essential service, and consequently it is exempt from any permitting by Aitkin County. GRE provided the attached document summarizing other permitting and review requirements. Further questions related to this transmission tap can be directed to GRE.



March 27, 2019

**TO FILE**

**RE: Environmental Review**  
Swatera 230-kV Tap Line Project  
Project Number 206950  
Aitkin County, Minnesota

As part of the Enbridge line 3 replacement project Great River Energy will build a new 230-kV tap line project to serve the new Enbridge Swatera substation and pump station. The tap line will be approximately 1,200' in length. The project is located just west of US Highway 169, Section 31, T51N, R26W, Aitkin County, Minnesota.

This project has been reviewed internally for environmental impacts of the proposed transmission.

- **Minnesota Public Utilities Commission (MPUC)** – Due to the length of the tap line being under 1,500' the project is exempt from MPUC jurisdiction. A letter has been filled with MPUC informing them of the project.
- **Minnesota Historical Society (MHS)** — The Project was reviewed by Wenck (Phase 1A Cultural Resources Assessment – see attached letter), who found no previously recorded archaeological resources or standing historic structures within the project area. As such, no further cultural resource review is needed.
- **Department of Natural Resources (DNR)** — The project is located within a scientific and natural area of moderate significance. An NHIS request was submitted to the DNR and it was recommended that disturbance be minimized as much as possible.
- **Minnesota Department of Transportation (MnDOT)** — The closest airport in the area is over 20 miles away. Because airports in the area should not be affected by the Project, a separate MNDOT review was not warranted.
- **U.S. Fish and Wildlife Service (USFWS)** — The project is within  $\frac{3}{4}$  miles of known NLEB records. Due to the tree clearing activities taking place outside of June and July and that known roost trees are more than 150' from tree clearing activities no permit is necessary.
- **U.S. Army Corps of Engineers (Corps)** — There are no wetlands on the proposed Project (see attached Hydrologic Features map). The Project will not impact any NWI wetlands or waterways.

Because less than an acre of soil will be disturbed for this project, a stormwater permit from the MPCA is not required.



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**Request Number: 6**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** The description of Modification No. 12 indicates it would impact parcels of land owned by Aitkin County. Please provide verification that Aitkin County does not have any concerns with the modification? Are any additional permits or approvals required from Aitkin County?

**RESPONSE:** Aitkin County has approved the needed land rights for this modification and has not expressed any additional concerns. No additional approvals are needed from the County.



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**Request Number: 7**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** The maps associated with Modification No. 13 include an area labeled T-167-1 to the northeast of the Gowan North Substation parcel described as additional workspace. Please provide greater detail on this additional workspace. Has Enbridge acquired land rights needed for this modification?

**RESPONSE:** The portion of Modification No. 13 located on T-167-1 is for an extended ditch culvert to accommodate a wide driveway to turn west off of County Road 86 into the Gowan Station. A county permit has been acquired for this work, and no additional land rights are needed.

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**Request Number: 8**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** Has Enbridge acquired land rights needed for Modification No. 15?

**RESPONSE:** Yes, Enbridge owns this tract in fee.

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**Request Number: 9**

**Reference:** Enbridge Energy, Limited Partnership. *Application for Approval of Route Width Variations and Permit Amendment*. May 3, 2019.

**Request:** Has Enbridge acquired land rights needed for Modification No. 17? Please provide verification that Carlton County and the DNR do not have any concerns with the modification?

**RESPONSE:** Enbridge and Carlton County have been discussing this modification and negotiating the terms of use for the County property affected. The discussion with Carlton County is ongoing, and Enbridge will continue to work toward a mutually acceptable agreement for the needed workspace.

The MDNR recommended that Enbridge drop Vennoah Lake as a water appropriation source and use Chub Lake instead. MDNR is aware this modification is ongoing.