

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's Application for Approval of Route Width Variations and Permit Amendment for the Line 3 Project***

**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:

Enbridge Energy, Limited Partnership ("Enbridge") submits these reply comments regarding its Application for Approval of Route Width Variations and Permit Amendment ("Modification Request"). As an initial matter, Enbridge acknowledges that the procedural posture of this docket has changed as a result of the Minnesota Court of Appeals' June 3, 2019, decision. As such, Enbridge will not address Friends of Headwaters' May 31, 2019, comments regarding the finality of the routing permit.

Second, Enbridge appreciates the May 31, 2019, comments from the Department of Commerce, Energy Environmental Review and Analysis ("DOC-EERA"). Enbridge agrees with DOC-EERA's conclusions regarding the Modification Request.

Third, Enbridge has reviewed the May 31, 2019, comments submitted by Keith Carlson on behalf of Brandon and Jennifer Suonvieri. The Suonvieris appear to comment regarding Modification Request No. 13, related to the Gowan Pump Station. As noted in the Modification Request, Enbridge has the necessary property rights for this modification, with the exception of a portion of the modification which will be located in existing road right-of-way. As shown on Attachment 1, Modification Request No. 13 does not affect the Suonvieris' property. The location of the Gowan Pump Station site has not changed since Enbridge concluded negotiations

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with the Suonvieris and they executed easement agreements. The Suonvieri residence is approximately 1,000 feet from the area of the requested modification, and there are four other residences in closer proximity. (See attached map.) Both topography and trees will obscure the view of the pump station, and the residence does not have a direct view of the pump station. Given this location, and the Suonvieri residence's distance of approximately only 150 feet from U.S. Highway 2, Enbridge does not agree that the location of the Gowan Pump Station will adversely affect this property. At one time, Enbridge sought to locate the Gowan Pump Station on or near the Suonvieri parcel. However, after negotiations regarding such location were unsuccessful, Enbridge relocated the Gowan Pump Station to its current location, which, as noted, is approximately 1,000 feet from the property. This is the location depicted in the Route Permit, and Requested Modification No. 13 does not move any facilities closer to the Suonvieri parcel or otherwise increase impacts thereupon.

A copy of this filing has been e-filed today on behalf of Enbridge through [www.edockets.state.mn.us](http://www.edockets.state.mn.us) and 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*

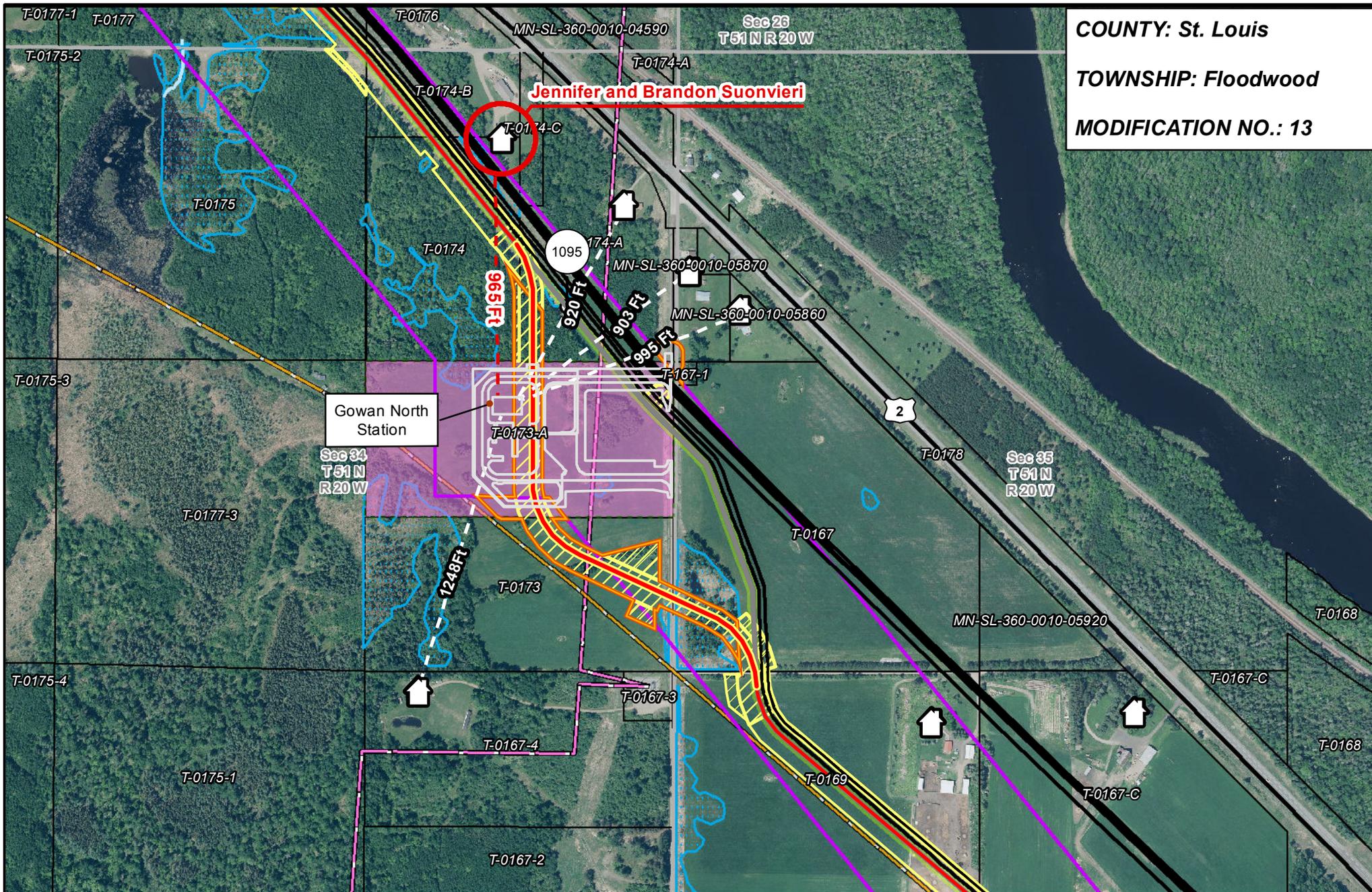
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Attachment

66939345

# Attachment 1

**COUNTY:** St. Louis  
**TOWNSHIP:** Floodwood  
**MODIFICATION NO.:** 13



- |                       |   |                                |                        |
|-----------------------|---|--------------------------------|------------------------|
| PUC Designated Route  | Mile Post                               | Pipeline Outside PUC Corridor  | Tract Boundary         |
| ROW                   | Deviated Temporary Workspace            | Surveyed Waterbodies           | MN Section Boundary    |
| Line 3R Pipeline      | Deviated Additional Temporary Workspace | ESA                            | Township/City Boundary |
| Valve Location        | Existing Enbridge Pipelines             | Surveyed Wetlands              | County Boundary        |
| Enbridge Pump Station | Existing Electric Transmission          | NWI Wetlands                   |                        |
|                       | Existing Third Party Pipelines          | Workspace Outside PUC Corridor |                        |

**LINE 3 REPLACEMENT PIPELINE ROUTE AMENDMENT**

DRAWN: CLS      CHECKED: --  
 DATE: January 28, 2019      SCALE: 1:6,000

0      250      500  
 Feet

Map 343 of 378