

KEITH M. CARLSON LAW FIRM

807 Cloquet Avenue • P.O. Box 770
Cloquet, MN 55720

KEITH M. CARLSON
Attorney at Law

Telephone 218-879-1373 • Fax 218-879-1458
E-mail: keithmcarlsonlaw@hotmail.com

June 17, 2020

Minnesota Public Utilities Commission
121 7th Place East
Suite 350
Saint Paul, Minnesota 55101-2147

Re: OBJECTION TO APPLICATION TO AMEND LINE 3
PIPELINE ROUTING PERMIT

PUC Docket Number PL9/PPL-15-137

To: Minnesota Public Utilities Commission:

I represent Brandon Suonvieri and Jennifer Suonvieri in their request that the Minnesota Public Utilities Commission deny Enbridge's request to Modification 13 (Mile Post 1095) in their application. In 2007, Brandon and Jennifer Suonvieri granted an easement to Enbridge Energy for the installation of additional pipelines on their property. In August of 2018, the Suonvieri's entered into negotiations with Enbridge Energy for an expansion of the easement for Line 3 which resulted in the amendment to the right-of-way.

During the negotiations occurring in 2018, Enbridge representative Zak Bradburn, Enbridge promised the Suonvieri's that the location of the pumping station to later be installed would not change. Mr. Bradburn further promised that Enbridge would be using the same pipeline route and would cross the easement further down to the east and as a result, the Suonvieri's would not be able to observe the line to the pumping station or the pumping station itself. The Suonvieri's signed the Amendment to the Right of Way based upon Enbridge's promises. The Suonvieri's were adamant and only signed the agreement as a result of the promises that the line to the pumping station and the pumping station would not change.

The proposed change in the pumping station is in violation of the promises that Enbridge agents stated. Enbridge will be removing numerous trees that border the Suonvieri property and if the modification 13 is granted, the Suonvieri's will be able to see the new line and the pumping station from their deck. Although the change in the location of the pumping station is not be on the Suonvieri's property, the change adversely affects my clients as a result of the visibly to see the line entering the pumping station and also the pumping station.

As a result of the visibility of the line and the pumping station, my client's property value would be reduced. The lighting of the pumping station and the pumping station itself would be visibly seen by the Suonvieri's. Enbridge cites the reason for the Modification 13 change is "to accommodate a landowner's request." However, the change is not necessary and does not affect the remaining requests by Enbridge for modifications.

Further, the promises made to the Suonvieri's by Enbridge including the guarantee that the location of the pumping station will not change must be adhered to. Therefore, the Suonvieri's strenuously object to the application to amend modification 13 of the Line 3 pipeline permit.

If you have any questions, please contact me.

Sincerely,



Keith M. Carlson
KMC/mk