

May 5, 2020

### **VIA ELECTRONIC FILING**

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

Re: 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. Seuffert:

Enbridge Energy, Limited Partnership ("Enbridge") requests that the Minnesota Public Utilities Commission ("Commission") approve route width variations and a permit amendment for the Pipeline Routing Permit ("Route Permit") for the Line 3 Replacement Project ("Project") pursuant to Minn. R. 7852.3400 and Sections 3.5 and 10 of the Route Permit. As described in more detail in this filing, Enbridge requests 12 route width and centerline modifications of the PUC Designated Route.<sup>1</sup> The following table provides an overview of the requested modifications.

Modification	Mile		
No.	Post	County	Reason for Modification
1	828	Marshall	Avoidance of impacts to cultural resources.
2	915	Clearwater	Landowner and U.S. Fish and Wildlife
			Service ("USFWS") coordination.
3	925	Clearwater	Installation of cathodic protection ground
			bed.
4	927	Clearwater	Reduce impacts to wetlands protected by
			USFWS conservation easements.
5	931	Clearwater	Minimize impact to landowner farming
			activities.
6	994	Wadena	Shift of route to location where Enbridge has

<sup>&</sup>lt;sup>1</sup> The PUC Designated Route is the route identified in the Route Permit issued to Enbridge on May 1, 2020 in Docket No. PL9/PPL-15-137.

Modification	Mile		
No.	Post	County	Reason for Modification
			existing land rights.
7	1019	Cass	Landowner request to relocate cathodic protection ground bed.
8	1054	Aitkin	Further design of facilities associated with Swatara Pump Station on property to be owned by Enbridge.
9	1062	Aitkin	Installation of cathodic protection ground bed.
10	1073	Aitkin	Avoid heavily saturated area with constructability concerns.
11	1095	St. Louis	Landowner coordination.
12	1117	Carlton	Optimal crossing of I-35 and co-location with existing Lines 67, 13, and 4 in this location.

# 1. Enbridge's May 3, 2019 Application for Approval of Route Width Variations and Permit Amendment.

On May 3, 2019, Enbridge submitted its prior Application for Approval of Route Width Variations and Permit Amendment ("2019 Application") pursuant to the Route Permit issued to Enbridge on January 18, 2019 in this docket. On May 31, 2019, DOC-EERA provided comments concluding that "The Permittee's analysis demonstrates that the requested modifications are minor enough deviations from the originally permitted route that they do not affect the potential significant adverse environmental effects of the project." DOC-EERA further commented that "Based on the existing record, EERA staff does not believe the Commission should require further study, hold additional public meetings, or assess additional fees."

The 2019 Application included 17 route width and centerline modifications. Each of the modifications requested by Enbridge in this application was included in the 2019 Application. However, for the purposes of efficiency and to avoid confusion, Enbridge's current request does not include modifications involving only additional temporary workspace ("ATWS") because ATWS located outside the Designated Route is already contemplated by the Route Permit. Specifically, Section 3.3 of the Route Permit provides that Enbridge "is authorized to use additional temporary workspace outside the typical construction workspace to facilitate specific aspects of construction . . . Additional temporary workspace outside of the authorized route will be obtained from affected landowners through rental agreements. As applicable, additional temporary workspace may be reviewed and modified by federal and state permitting authorities as part of other approval processes."

### 2. Applicable Law.

Section 10 of the Route Permit provides that Enbridge may apply to the Commission for amendments to the Route Permit in accordance with Minn. R. 7852.3400. Pursuant to Minn. R. 7852.3400, Enbridge may apply to the Commission for an amendment of the route location or conditions in the Route Permit. An application for an amendment must include information sufficient for the Commission to determine:

- A. whether, in light of the criteria in parts 7852.0700 and 7852.1900, the requested changes are significant enough to warrant commission study and approval;
- B. whether to order public information meetings near the affected area; and
- C. whether additional fees shall be assessed.

The Commission makes the above determinations within 45 days or, if it decides to study the application further, within 70 days.<sup>2</sup>

In addition, Section 3.5 of the Route Permit provides that "[r]oute width variations may be allowed" in the event of:

- 1. Unforeseen circumstances encountered during the detailed engineering and design process.
- 2. Federal or state agency requirements.
- 3. Existing infrastructure within the pipeline route, including but not limited to railroads, natural gas and liquid pipelines, high voltage electric transmission lines, or sewer and water lines.

As described in more detail below and in the attached filing, the requested modifications are insignificant, the resulting impacts have generally been contemplated within the existing record, and no further study is necessary for Commission approval.

<sup>&</sup>lt;sup>2</sup> Minn. R. 7852.3400.

### 3. Summary of Analysis.

a. Significance of Requested Modifications When Considering Routing Criteria.

As noted previously, the modifications requested by Enbridge are generally proposed to avoid or mitigate Project impacts (including aligning construction practices and Project design more closely with prior pipeline construction in these areas). Specifically:

- One modification is proposed to avoid impacts to cultural resources (No. 1);
- Four modifications are proposed to accommodate landowner requests (Nos. 2, 5, 7 and 11);
- Two modifications are proposed to reduce wetland impacts (Nos. 4 and 10);
- Two modifications are proposed to align Project construction and design more closely with prior pipeline construction and/or design in these locations (Nos. 6 and 12); and
- Three modifications are proposed as a result of further detailed design and/or construction engineering analysis (Nos. 3, 8 and 9).

Thus, as described further in this filing, the requested modifications to the PUC Designated Route have similar or lesser human and environmental impacts as the corresponding section of the PUC Designated Route. Where modifications are requested for construction-related issues, the modifications have generally been designed to minimize impacts, including by being located in previously disturbed areas. In addition, each of the modifications requested by Enbridge in this filing has been included in Enbridge's application submissions to the MDNR, Minnesota Pollution Control Agency, and U.S. Army Corps of Engineers.

Further, the requested modifications fall within the categories identified in Section 3.5 of the Route Permit for which route width variations are authorized.

### b. Public Information Meetings.

The requested modifications are in close proximity to the PUC Designated Route, and Enbridge has been coordinating with potentially affected landowners concerning the modifications. As discussed in more detail in this filing and except where specifically noted, Enbridge generally has all land rights needed for each modification, several of which are proposed on property that is already or will be owned in fee by Enbridge. Further, as noted above, the requested modifications have similar or lesser human and environmental impacts than the PUC Designated Route. As such, Enbridge respectfully submits that additional public information meetings are not warranted.

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#### Additional Fees. c.

Enbridge agrees to pay any additional fees, to the extent the Commission determines they should be assessed.

#### 4. Enclosed Documents.

With respect to each requested modification, Enbridge includes: (1) a description of the proposed modification; (2) the purpose of and justification for the modification; (3) an analysis of the potential impacts of the modification on the human and natural environment; and (4) a map depicting the permitted route segment and corresponding proposed modification (see Attachment D). In addition, Attachment A lists the sources used to complete the analysis provided in this filing.

#### 5. Conclusion.

Because the overall impact of each proposed modification is comparable to the corresponding segment of the permitted route, Enbridge respectfully requests that the Commission grant an amendment to the Route Permit for the locations described above and shown in the enclosed attachments. Specifically, Enbridge requests that the Commission amend the Route Permit issued on May 1, 2020 by replacing the specific PUC Designated Route maps included in Attachment 3 of the Route Permit with those included as Attachment D in this request.

This letter has been e-filed today through www.edockets.state.mn.us and is also being served upon the persons on the Official Service List of record. In addition, this filing is being served upon affected landowners (i.e., parcels affected by the requested modifications and parcels adjacent thereto. See Attachment C for a list of affected landowners).

Sincerely,

/s/ Christina K. Brusven

Christina K. Brusven Attorney at Law **Direct Dial:** 612.492.7412

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# MODIFICATION NO. 1 MP 828

### **Modification No. 1 – Milepost 828**

Enbridge requests a route modification outside the PUC Designated Route near MP 828 in Marshall County, Minnesota.

### A. Description of Proposed Route Modification

As seen in the enclosed revised Maps 033 and 034, Enbridge seeks a route modification outside the PUC Designated Route near MP 828 in Wanger Township, Marshall County, for the Project's crossing of the Tamarac River. The requested modification is approximately 4,939 feet in length and would cross the Tamarac River farther west than the crossing in the PUC Designated Route.

### B. Reason for Proposed Route Modification

Enbridge requests this modification to avoid impacts to cultural resources identified during Tribal Cultural Resource ("TCR") field surveys along the PUC Designated Route. Enbridge performed further design and engineering work in response to this issue, coordinated additional field surveys, and in coordination with the TCR management team, concluded that the proposed modification would avoid impacts to the cultural resources identified in this area.

### C. Analysis of Potential Human and Environmental Impacts

Tables 1.1 and 1.2 below show the impacts of the modification being requested at MP 828. The third and fourth columns of Table 1.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification avoids cultural resource impacts and results in less wetland impacts. Although the modification also results in greater impacts to forested and agricultural land and will not be co-located with existing right-of-way, these impacts are necessary to avoid impacting the identified cultural resource site. Enbridge has acquired the additional land rights needed for this modification.

Table 1.1
<b>Analysis of Route Modification No. 1 (Milepost 828)</b>
for the Line 3 Replacement Project

Resource/Category	Units	<b>PUC Designated Route</b>	<b>Requested Modification</b>
Total Length	Feet	4,126	4,939
Length Parallel to Existing Rights-of-Way	Feet	1,822	382
Roads Crossed	Number	0	0
Parcels Crossed	Number	3	6
Residences within 300 feet of the Pipeline Route	Number	0	0
Total Impacts on Surveyed Wetlands	Acres	0.32	0.24
Land Use			
Forested Land Crossed	Acres	0.00	1.20
Agricultural Land Crossed	Acres	10.40	13.77
Developed Land Crossed	Acres	0.00	0.31
Wetlands Crossed <sup>a</sup>	Acres	0.00	0.00
Open Land Crossed	Acres	0.00	0.00

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using Gap Analysis Program ("GAP") land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Table 1.2			
Route Comparison of Route Modification No. 1 (Milepost 828)			
Human settlement, existence and density of	The requested modification would have no		
populated areas, existing and planned future	additional impact on these features because the		
land use, and management plans	parcels crossed are of similar nature to those		
	previously impacted and no new structures are impacted by the modification.		
Natural environment, public and designated	The requested modification will result in a		
lands, including but not limited to natural	different crossing location of the Tamarac		
areas, wildlife habitat, water, and recreational	River, which is a Minnesota Public Water		
lands	Inventory ("PWI") watercourse. The requested		
	modification would avoid crossing an oxbow/wetland feature associated with the		
	river.		
Lands of historical, archaeological, and	The purpose of the requested modification is to		
cultural significance	avoid a cultural site that was identified during		
	Enbridge's field survey. Based on Enbridge's		
	survey and the TCR Survey, no lands of		
	historical, archeological, or cultural		
	significance would be impacted by		
	construction along the requested modification.		
Economies within the route, including	The requested modification would increase		
agricultural, commercial or industrial, forestry, recreational, and mining operations	impacts on agricultural lands by 3.37 acres. These types of impacts were previously		
recreational, and mining operations	contemplated in the PUC permitting process		
	and do not have the potential to significantly		
	impact these resources.		
Pipeline cost and accessibility	This modification will increase pipeline cost		
	slightly because of the increased length of the		
	requested modification when compared to the		
	PUC Designated Route.		
Use of existing rights-of-way and right-of-way	This modification would reduce the amount of		
sharing or paralleling	right-of-way sharing or paralleling by approximately 1,440 feet, as it diverges from		
	the existing Enbridge Mainline right-of-way to		
	avoid a cultural site and provide for an optimal		
	crossing location of the Tamarac River.		
Natural resources and features	The requested modification would reduce		
	impacts on surveyed wetlands by 0.08 acre and		
	increase impacts on forested lands by 1.2 acres.		
	These types of impacts were previously		
	contemplated in the PUC permitting process		
	and do not have the potential to significantly		
	impact these resources.		

Table 1.2		
Route Comparison of Route Modification No. 1 (Milepost 828)		
Extent to which human or environmental	Any change in impacts on regulated features	
effects are subject to mitigation by regulatory	would be reflected in permits issued for the	
control and permit conditions	Project. No new permits are required due to	
	this modification.	
Cumulative potential effects of related or	The requested modification would not result in	
anticipated future pipeline construction	a significant change in potential cumulative	
	effects because the overall length and acreage	
	of the impact is insignificant relative to the	
	scale of the whole Project.	
Relevant applicable policies, rules, and	The same policies, rules, and regulations of	
regulations of other state and federal and local	other state, federal, and local land use laws	
government land use laws	would apply to the requested modification and	
	the PUC Designated Route.	

# MODIFICATION NO. 2 MP 915

### **Modification No. 2 – Milepost 915**

Enbridge requests a route modification outside the PUC Designated Route near MP 915 in Clearwater County, Minnesota.

#### A. Description of Proposed Route Modification

As seen on the enclosed revised Maps 134 and 135, Enbridge requests a route modification between MP 915 and MP 916 in Holst Township, Clearwater County. The requested modification is approximately 3,736 feet in length.

#### B. Reason for Proposed Route Modification

This modification arises after coordination with landowners and the United States Fish and Wildlife Service ("USFWS"). The landowner of tract MN-CL-C5-014.000 within the PUC Designated Route did not sign a voluntary easement, so Enbridge proposed moving the centerline alignment to the tract to the west, which shifted a portion of the route on tract MN-CL-C5-013.000. USFWS has a conservation easement on this tract that precedes Enbridge's request for an easement. Enbridge and USFWS have come to an informal agreement that will reduce the impacts of the Project within USFWS easement wetlands on that tract. The USFWS correspondence is attached to this request as Attachment B.

### C. Analysis of Potential Human and Environmental Impacts

Tables 2.1 and 2.2 below show the impacts of the modification being requested at MP 915. The third and fourth columns of Table 2.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification reduces impacts on surveyed wetlands by 1.08 acres, increases impacts on forested lands by 0.42 acre, and would not be co-located with the existing right-of-way. The modification is consistent with Enbridge's coordination with USFWS and reduces impacts to one of that agency's conservation easements. Enbridge has acquired all required land rights for this modification.

Open Land Crossed

Table 2.1 Analysis of Route Modification No. 2 (Milepost 915) for the Line 3 Replacement Project				
Resource/Category Units PUC Designated Route Requested Modification				
Total Length	Feet	3,419	3,736	
Length Parallel to Existing Rights-of-Way	Feet	3,419	1,371	
Roads Crossed	Number	0	0	
Parcels Crossed	Number	3	3	
Residences within 300 feet of the Pipeline Route	Number	0	0	
Total Impacts on Surveyed Wetlands	Acres	2.62	1.54	
Land Use				
Forested Land Crossed	Acres	7.82	8.24	
Agricultural Land Crossed	Acres	0.00	0.00	
Developed Land Crossed	Acres	0.00	0.00	
Wetlands Crossed a	Acres	0.00	0.00	

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Acres

0.00

0.00

Table 2.2		
Route Comparison of Route Modification No. 2 (Milepost 915)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because the parcels crossed are of similar nature to those previously impacted and no new structures are impacted by the modification. This modification is requested as a result of further landowner coordination.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	Although the requested modification continues to cross one USFWS conservation easement, the modification was designed in consultation with the USFWS to minimize impacts.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would have no additional impact on these features.	
Pipeline cost and accessibility	This modification will increase pipeline cost slightly because of the increased length of the requested modification when compared to the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification would reduce the amount of right-of-way sharing by approximately 2,048 feet, as it diverges from the Minnesota Pipe Line right-of-way to avoid the landowner tract where a voluntary easement could not be obtained and minimize impacts to USFWS interests	
Natural resources and features	The requested modification would reduce impacts on surveyed wetlands by 1.08 acres but would increase impacts on forested lands by 0.42 acre but are not substantial enough to have the potential to significantly impact these resources.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	

Table 2.2		
Route Comparison of Route Modification No. 2 (Milepost 915)		
Cumulative potential effects of related or	The requested modification would not result	
anticipated future pipeline construction	in a significant change in potential cumulative	
	effects because the overall length and acreage	
	of impact is insignificant relative to the scale	
	of the whole Project.	
Relevant applicable policies, rules, and	The route modification reflects an informal	
regulations of other state and federal and local	agreement between Enbridge and USFWS	
government land use laws	and will reduce impacts of the Project in	
	USFWS easement wetlands on these parcels.	

## MODIFICATION NO. 3 MP 925

### **Modification No. 3 – Milepost 925**

Enbridge requests permission for workspace outside the PUC Designated Route near MP 925 in Clearwater County, Minnesota.

### A. Description of Proposed Route Modification

As seen on the enclosed revised Map 148, Enbridge seeks a modification to the PUC Designated Route near MP 925 in Nora Township, Clearwater County. The requested modification consists of approximately 7,011 square feet outside of the PUC Designated Route.

#### B. Reason for Proposed Route Modification

This modification is requested to allow for the installation of cathodic ground bed at this location. Cathodic protection systems are installed to mitigate the threat of external corrosion on pipelines. Although the requested modification is outside the PUC Designated Route as described above, Enbridge's additional design and engineering work has indicated that this area will be required for the installation of the cathodic ground bed at this location.

### C. Analysis of Potential Human and Environmental Impacts

Tables 3.1 and 3.2 below show the impacts of the modification being requested at MP 925. The third column of Table 3.1 provides specific data on the area of the requested modification that is outside the PUC Designated Route. This modification impacts one parcel that is already crossed by the PUC Designated Route. Enbridge anticipates that no additional private land rights will be required, as this modification will impact county road right-of-way. As shown on the tables below and related maps, this modification does not result in significant impacts because it is in a cleared area that is adjacent to a roadway.

<b>Table 3.1</b>
<b>Analysis of Route Modification No. 3 (Milepost 925)</b>
for the Line 3 Replacement Project

	•	Requested Modification Outside
Resource/Category	Units	<b>PUC Designated Route</b>
Total Area	Square Feet	7,011
Length Parallel to Existing	Feet	
Rights-of-Way		N/A
Roads Crossed	Number	0
Parcels Crossed	Number	1
Residences within 300 feet of	Number	
the Pipeline Route		0
Total Impacts on Surveyed	Acres	
Wetlands		0.00
Land Use		
Forested Land Crossed	Acres	0.13
Agricultural Land Crossed	Acres	0.00
Developed Land Crossed	Acres	0.03
Wetlands Crossed a	Acres	0.00
Open Land Crossed	Acres	0.00

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Table 3.2		
Route Comparison of Route Modification No. 3 (Milepost 925)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because it is located on a parcel already crossed by the PUC Designated Route and the workspace is contained within the road right-of-way.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would have no additional impact on these features because it is located within a road right-of-way.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would have no additional impact on these features.	
Pipeline cost and accessibility	Pipeline cost and accessibility will be similar to that of the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification is adjacent to existing roadway.	
Natural resources and features	A Geographic Information System ("GIS") analysis suggests that the requested modification would increase impacts on the forested area land use type by 0.13 acre, however visual imagery shows that the workspace is located within an existing cleared area.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required for this modification.	
Cumulative potential effects of related or anticipated future pipeline construction	The requested modification would not result in a significant change in potential cumulative effects because the overall length and acreage of impact is insignificant relative to the scale of the whole Project.	
Relevant applicable policies, rules, and regulations of other state and federal and local government land use laws	The same policies, rules, and regulations of other state, federal and local land use laws would apply to the requested modification and the PUC Designated Route.	

## MODIFICATION NO. 4 MP 927

### Modification No. 4 – Milepost 927

Enbridge requests a route modification outside the PUC Designated Route near MP 927 in Clearwater County, Minnesota.

### A. Description of Proposed Route Modification

As seen on the enclosed revised Maps 151 and 152, Enbridge seeks a route modification outside the PUC Designated Route near MP 927 in Nora and Moose Creek Townships, Clearwater County, Minnesota. The requested modification is approximately 7,081 feet in length.

### B. Reason for Proposed Route Modification

This modification is requested to reduce impacts to wetlands protected by USFWS conservation easements on the portion of the PUC Designated Route that was formerly RSA-05. Based on Enbridge's further design and engineering work, as many as 10-12 protected wetlands would have been impacted by the original route of RSA-05. Although the requested modification is outside the PUC Designated Route as described above, it moves the pipeline off USFWS easement wetlands, and Enbridge has coordinated with USFWS on conservation measures to further reduce impacts. *See* April 10, 2018 letter included as <u>Attachment B</u>.

### C. Analysis of Potential Human and Environmental Impacts

Tables 4.1 and 4.2 below show the impacts of the modification being requested at MP 927. The third and fourth columns of Table 4.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification would reduce impacts on surveyed wetlands and forested lands by 0.73 acre and 1.30 acres, respectively. It would reduce collocation and would increase impacts on agricultural land by 2.5 acres. The requested modification supported the route presented by Enbridge to the USFWS regarding impacts on this conservation easement and would address a commitment Enbridge made to USFWS. Enbridge has obtained all land rights needed for this modification.

		Table 4.1	
Analy	ysis of Route N	Modification No. 4 (Milepo	st 927)
	for the Lin	e 3 Replacement Project	
Resource/Category Units PUC Designated Route Re			Request
Total Length	Feet	6.766	

Resource/Category	Units	<b>PUC Designated Route</b>	Requested Modification
Total Length	Feet	6,766	7,081
Length Parallel to Existing Rights-of-Way	Feet	6,766	4,348
Roads Crossed	Number	2	1
Parcels Crossed	Number	5	5
Residences within 300 feet of the Pipeline Route	Number	0	0
Total Impacts on Surveyed Wetlands	Acres	4.48	3.75
Land Use			
Forested Land Crossed	Acres	9.88	8.58
Agricultural Land Crossed	Acres	6.58	9.13
Developed Land Crossed	Acres	0.46	0.1
Wetlands Crossed a	Acres	0.00	0.00
Open Land Crossed	Acres	0.00	0.00

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* <u>Attachment A</u>). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Table 4.2		
Route Comparison of Route Modification No. 4 (Milepost 927)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would not have any additional impact on human settlement. The requested modification would be near an uninhabited property with a fenced pasture and small shed.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would minimize impacts on protected wetlands located within a USFWS conservation easement.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The modification would result in an increased impact on agricultural land of about 2.5 acres. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Pipeline cost and accessibility	This modification will increase pipeline cost slightly because of the increased length of the requested modification when compared to the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification would reduce the amount of right-of-way sharing or paralleling by approximately 2,418 feet to avoid the USFWS easement.	
Natural resources and features	The requested modification would reduce impacts on surveyed wetlands and forested lands by 0.73 acre and 1.30 acres, respectively.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	
Cumulative potential effects of related or anticipated future pipeline construction	The requested modification would not result in a significant change in potential cumulative effects because the overall mileage or acreage of impact is insignificant relative to the scale of the whole Project.	

Table 4.2			
Route Comparison of Route Modification No. 4 (Milepost 927)			
Relevant applicable policies, rule	s, and	The route modification would support a	
regulations of other state and federal and local		pipeline route consistent with Enbridge's	
government land use laws		commitment to the USFWS regarding	
		impacts to conservation easements.	

## MODIFICATION NO. 5 MP 931

### Modification No. 5 – Milepost 931

Enbridge requests a route modification outside the PUC Designated Route near MP 931 in Clearwater County, Minnesota.

#### A. Description of Proposed Route Modification

As seen in the enclosed revised Maps 155 and 156, Enbridge seeks a route modification outside the PUC Designated Route near MP 931 and 932 in Moose Creek Township, Clearwater County, to accommodate a landowner request. The requested modification is approximately 4,918 feet in length.

### B. Reason for Proposed Route Modification

This modification arises from the landowner's request to move the pipeline to the westerly edge of these tracts and adjacent to the boundary of the property to minimize impacts to farming activities.

### C. Analysis of Potential Human and Environmental Impact

Tables 5.1 and 5.2 below show the impacts of the modification being requested at MP 931. The third and fourth columns of Table 5.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification would reduce impacts on agricultural lands by 0.17 acre, increase impacts on surveyed wetlands by 0.44 acre, and reduce impacts on forested land by 1.07 acres. All parcels impacted by this modification were previously impacted by the PUC Designated Route, and Enbridge has acquired all land rights needed for this modification.

Table 5.1			
Analysis of Route Modification No. 5 (Milepost 931)			
for the Line 3 Replacement Project			
Resource/Category Units PUC Designated Route Requested Modification			
Total Length	Feet	5,278	4,918
Length Parallel to Existing Rights-of-Way	Feet	500	500
Roads Crossed	Number	1	1
Parcels Crossed	Number	4	4
Residences within 300 feet of the Pipeline Route	Number	0	0
Total Impacts on Surveyed Wetlands	Acres	0.76	1.20
Land Use			
Forested Land Crossed	Acres	6.37	5.30
Agricultural Land Crossed	Acres	7.81	7.64
Developed Land Crossed	Acres	0.30	0.28
Wetlands Crossed <sup>a</sup>	Acres	0.00	0.00
Open Land Crossed	Acres	0.00	0.00

Open Land Crossed Acres 0.00 0.00

a Wetland acres presented here were developed using GAP land cover data (see Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

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Table 5.2		
Route Comparison of Route Modification No. 5 (Milepost 931)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features; however, it would address a landowner request.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification will cross an Unnamed Stream also designated as a PWI watercourse. The PUC Designated Route would also cross this stream in a different location. The requested modification would have no additional impact on these features.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would reduce impacts on agricultural lands by 0.17 acre.	
Pipeline cost and accessibility	This modification will increase pipeline cost slightly because of the increased length of the requested modification when compared to the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification would have no additional impact on these features.	
Natural resources and features	The requested modification would increase impacts on surveyed wetlands by 0.44 acre and reduce impacts on forested land by 1.07 acres. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	
Cumulative potential effects of related or anticipated future pipeline construction	The requested modification would not result in a significant change in potential cumulative effects because the overall mileage or acreage of impact is insignificant relative to the scale of the whole Project.	

Table 5.2			
Route Comparison of Route Modification No. 5 (Milepost 931)			
Relevant applicable policies, rules, and The same policies, rules, and regulations of			
regulations of other state and federal and local	other state, federal and local land use laws		
government land use laws	would apply to the requested modification		
	and the PUC Designated Route.		

## MODIFICATION NO. 6 MP 994

### Modification No. 6 – Milepost 994

Enbridge requests a route modification for workspace outside the PUC Designated Route near MP 994 in Wadena County, Minnesota.

### A. Description of Proposed Route Modification

As seen in the enclosed revised Map 241, Enbridge seeks a route modification outside the PUC Designated Route near MP 994 in Huntersville Township, Wadena County. The requested modification would result in approximately 3,073 square feet outside the PUC Designated Route.

### B. Reason for Proposed Route Modification

This modification is the result of a shift in the centerline alignment to a location where Enbridge has acquired land rights on a parcel owned by Lessard-Sams Outdoor Heritage Council and administered by the MDNR. The alignment shift caused the temporary workspace and permanent right-of-way to shift slightly outside of the PUC Designated Route.

### C. Analysis of Potential Human and Environmental Impacts

Tables 6.1 and 6.2 below show the impacts of the modification being requested at MP 994. The third column of Table 6.1 provides specific data on the area of the requested modification that is outside the PUC Designated Route. The modification is located on land administered by the MDNR and was included in Enbridge's 2018 application to the MDNR for a License to Cross Public Lands. The 2018 application was updated and resubmitted to MDNR on December 20, 2019.

Table 6.1
<b>Analysis of Route Modification No. 6 (Milepost 994)</b>
for the Line 3 Replacement Project

	*	Requested Modification Outside
Resource/Category	Units	PUC Designated Route
Total Area	Square Feet	3,073
Length Parallel to Existing	Feet	*N/A
Rights-of-Way		
Roads Crossed	Number	0
Parcels Crossed	Number	1
Residences within 300 feet of	Number	0
the Pipeline Route		
Total Impacts on Surveyed	Acres	0.00
Wetlands		
Land Use		
Forested Land Crossed	Acres	0.07
Agricultural Land Crossed	Acres	0.00
Developed Land Crossed	Acres	0.00
Wetlands Crossed <sup>a</sup>	Acres	0.00
Open Land Crossed	Acres	0.00

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

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<sup>\*</sup> Workspace only

Table 6.2		
Route Comparison of Route Me	odification No. 6 (Milepost 994)	
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because the modification results in only a slight shift of the impacts on a parcel previously impacted by the PUC Designated Route.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would increase impacts on MDNR-administered lands within the Huntersville State Forest by 0.07 acre. This modification was included in Enbridge's 2018 application to the MDNR for a License to Cross Public Lands, which was updated in December 2019.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would increase impacts on forested land within the Huntersville State Forest by 0.07 acre. This impact would be temporary, and vegetation would be allowed to reestablish within the workspace.	
Pipeline cost and accessibility	Pipeline cost and accessibility will be similar to that of the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification is for temporary workspace only. At this location, the pipeline does not share and parallel an existing third-party right-of-way.	
Natural resources and features	The requested modification would increase impacts on forested lands by 0.07 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	

Table 6.2		
Route Comparison of Route Modification No. 6 (Milepost 994)		
Cumulative potential effects of related or	The requested modification would not result	
anticipated future pipeline construction	in a significant change in potential cumulative	
	effects because the overall length and acreage	
	of impact is insignificant relative to the scale	
	of the whole Project.	
Delevent applicable policies gules and	The same policies, rules, and regulations of	
Relevant applicable policies, rules, and regulations of other state and federal and local	other state, federal and local land use laws	
	would apply to the requested modification	
government land use laws	and the PUC Designated Route.	

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## MODIFICATION NO. 7 MP 1019

### **Modification No. 7 – Milepost 1019**

Enbridge requests permission for workspace outside the PUC Designated Route near MP 1019 in Cass County, Minnesota.

#### A. Description of Proposed Route Modification

As seen on the enclosed revised Map 266, Enbridge seeks a modification to the PUC Designated Route near MP 1018 to 1019 in Barclay Township, Cass County. The requested modification consists of approximately 2,930 square feet outside of the PUC Designated Route on property that is owned by Enbridge.

### B. Reason for Proposed Route Modification

This modification is requested to accommodate a landowner request that the cathodic protection ground bed be relocated from the landowner's property onto Enbridge-owned property. Although the requested modification is outside the PUC Designated Route as described above, Enbridge's additional design and engineering work in response to the landowner request has indicated that this area will be required for the installation of the cathodic ground bed at this location.

### C. Analysis of Potential Human and Environmental Impacts

Tables 7.1 and 7.2 below show the impacts of the modification being requested at MP 1019. The third column of Table 7.1 provides specific data on the area of the requested modification that is outside the PUC Designated Route. As shown on the tables below, this modification would not result in significant impacts because it is proposed within a cleared area along a roadway and is on a parcel owned by Enbridge.

Table 7.1		
<b>Analysis of Route Modification No. 7 (Milepost 1019)</b>		
for the Line 3 Replacement Project		

	•	Requested Modification Outside	
Resource/Category	Units	PUC Designated Route	
Total Area	Square Feet	2,930	
Length Parallel to Existing	Feet	N/A	
Rights-of-Way			
Roads Crossed	Number	0	
Parcels Crossed	Number	1	
Residences within 300 feet of	Number	0	
the Pipeline Route			
Total Impacts on Surveyed	Acres	0.00	
Wetlands			
Land Use			
Forested Land Crossed	Acres	0.00	
Agricultural Land Crossed	Acres	0.07	
Developed Land Crossed	Acres	0.00	
Wetlands Crossed <sup>a</sup>	Acres	0.00	
Open Land Crossed	Acres	0.00	

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Table 7.2			
Route Comparison of Route Mo	dification No. 7 (Milepost 1019)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because the modification shifts impacts to existing road right-of-way on property owned by Enbridge.		
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would have no additional impact on these features because the modification is located within an existing road right-of-way.		
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.		
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would increase impacts on agricultural lands by 0.07 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.		
Pipeline cost and accessibility	Pipeline cost and accessibility will be similar to that of the PUC Designated Route.		
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification is adjacent to an existing roadway.		
Natural resources and features	The requested modification would have no additional impact on these features.		
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.		
Cumulative potential effects of related or anticipated future pipeline construction	The requested modification would not result in a significant change in potential cumulative effects because the overall length and acreage of impact is insignificant relative to the scale of the whole Project.		
Relevant applicable policies, rules, and regulations of other state and federal and local government land use laws	The same policies, rules, and regulations of other state, federal and local land use laws would apply to the requested modification and the PUC Designated Route.		

## MODIFICATION NO. 8 MP 1054

#### Modification No. 8 – Milepost 1054

Enbridge requests a route modification outside the PUC Designated Route near MP 1054 in Aitkin County, Minnesota.

#### A. Description of Proposed Route Modification

As seen in the enclosed revised Map 302, Enbridge seeks a route modification outside the PUC Designated Route near MP 1054 in Macville Township, Aitkin County, for facilities associated with the proposed Swatara Pump Station along the portion of the PUC Designated Route previously known as RSA-22.

#### B. Reason for Proposed Route Modification

This modification is requested to site facilities associated with the pump station along the portion of the PUC Designated Route formerly known as RSA-22. Enbridge selected this location along this portion of the route after additional design, engineering, environmental, and landowner consultation.

#### C. Analysis of Potential Human and Environmental Impacts

Tables 8.1 and 8.2 below show the impacts of the modification being requested at MP 1054. The third column of Table 8.1 provides specific data on the area of the requested modification that is outside the PUC Designated Route. As shown on the tables below, this modification would result in impacts on 1.54 acres of agricultural lands, 3.93 acres of surveyed wetlands and 8.78 acres of forested lands. It would impact an archaeological resource survey site that is proposed as not eligible for the National Register of Historic Places ("NRHP"), with a recommended action of no further investigation or avoidance needed. Enbridge proposes to locate the pump station within an existing gravel pit on the property, adjacent to the PUC Designated Route. Enbridge has a purchase agreement to acquire this property; although there is one existing residence, it will be demolished after Enbridge purchases the property. This location for the modification minimizes environmental impacts by reducing clearing of forested land and optimizes the site from an engineering standpoint by reducing earthwork and placing the foundations on competent soils.

<b>Table 8.1</b>
<b>Analysis of Route Modification No. 8 (Milepost 1054)</b>
for the Line 3 Replacement Project

	•	Requested Modification Outside	
Resource/Category	Units	PUC Designated Route	
Total Area	Square Feet	745,530	
Length Parallel to Existing	Feet	*N/A	
Rights-of-Way			
Roads Crossed	Number	1	
Parcels Crossed	Number	5	
Residences within 300 feet of	Number	1	
the Pipeline Route			
Total Impacts on Surveyed	Acres	3.93	
Wetlands			
Land Use			
Forested Land Crossed	Acres	8.78	
Agricultural Land Crossed	Acres	1.54	
Developed Land Crossed	Acres	0.00	
Wetlands Crossed <sup>a</sup>	Acres	0.00	
Open Land Crossed	Acres	0.00	

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

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<sup>\*</sup> Workspace only

Human settlement, existence and density of populated areas, existing and planned future land use, and management plans  Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Lands of historical, archaeological, and cultural significance  Lands of historical, archaeological, and converted one site within the modification. Based on coordination to date, Enbridge's recommendation that this site is not eligible for inclusion in the NRHP.  Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archaeological, or cultural significance would be impacted by construction along the requested modification.  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located vithin the MDNR Site of Biological Significance would be impacted by construction along the requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within	Table 8.2			
populated areas, existing and planned future land use, and management plans  Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Individual environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Lands of historical, archaeological, and cultural significance  Eands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Fine requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  Lands of historical, archaeological, and cultural significance  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Pipeline cost and accessibility  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands    Commonstructural significance   Commonstructu	1			
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  The requested modification would be partially located within the MDNR Site of Biological Significance ("SOBS") site of moderate diversity (5.86 acres). These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Lands of historical, archaeological, and cultural significance  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Forestry, recreational, and mining operations of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	land use, and management plans			
lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands  lands  lands  located within the MDNR Site of Biological Significance ("SOBS") site of moderate diversity (5.86 acres). These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Lands of historical, archaeological, and cultural significance  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification would result in impact son 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Use of existing rights-of-way and right-of-way sharing or paralleling  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	N. 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
areas, wildlife habitat, water, and recreational lands  Significance ("SOBS") site of moderate diversity (5.86 acres). These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
diversity (5.86 acres). These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Feonomies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	<u> </u>	_		
were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing		` ′		
Lands of historical, archaeological, and cultural significance  Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Fine requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	lands	* * * * * * * * * * * * * * * * * * * *		
Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
Lands of historical, archaeological, and cultural significance  Enbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
Lands of historical, archaeological, and cultural significance  Benbridge's archaeological survey documented one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Forestry, recreational, and mining operations of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
cultural significance  one site within the modification. Based on coordination to date, Enbridge does not expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Economies within the route, including agricultural, archeological, or cultural significance would be impacted by construction along the requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	Lands of historical, archaeological, and			
expect the USACE or MN State Historic Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Use of existing rights-of-way and right-ofway sharing or paralleling  Pipeline cost and accessibility or that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
Preservation Office ("SHPO") to disagree with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-ofway sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing		coordination to date, Enbridge does not		
with Enbridge's recommendation that this site is not eligible for inclusion in the NRHP. Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-ofway sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing		=		
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Accordingly, based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Forestry, recreational, and mining operations of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing		$\mathcal{C}$		
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archeological, or cultural significance would be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Forestry, recreation modification is in the PUC permitting process and do not have the potential to significantly impact these resources.  Fipeline cost and accessibility will be similar to that of the PUC Designated Route.  Forestry, recreational, and mining operations  Forestry, recreational, and mining operations  Forestry, recreations  Forestry, recreations  Forestry, recreations  Forestry, recr		, ,		
be impacted by construction along the requested modification.  Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations  Forestry, recreational, and mining operations portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-ofway sharing or paralleling  The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing		•		
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations    The requested modification would result in impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.    Pipeline cost and accessibility		_		
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agricultural, commercial or industrial, forestry, recreational, and mining operations  Impacts on 1.54 acres of agricultural lands. A portion of the land within the modification is located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-ofway sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	Economies within the route, including			
located on a private sand/gravel pit which is not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-ofway sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	,	=		
not currently in use. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	forestry, recreational, and mining operations	-		
were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
permitting process and do not have the potential to significantly impact these resources.  Pipeline cost and accessibility Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  Use of existing rights-of-way and right-of-way sharing or paralleling The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
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Pipeline cost and accessibility  Use of existing rights-of-way and right-of-way sharing or paralleling  Pipeline cost and accessibility will be similar to that of the PUC Designated Route.  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing				
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Use of existing rights-of-way and right-of-way sharing or paralleling  The requested modification is for temporary and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	Pipeline cost and accessibility			
way sharing or paralleling  and permanent workspace needed to construct the pump station. The pipeline would continue to share and parallel an existing	Use of existing rights-of-way and right of			
the pump station. The pipeline would continue to share and parallel an existing				
continue to share and parallel an existing	way sharing or paranoning			
<u> </u>				
		third-party right-of-way.		

Table 8.2		
Route Comparison of Route Mo	odification No. 8 (Milepost 1054)	
Natural resources and features	The requested modification would result in impacts on surveyed wetlands and forested lands of 3.93 and 8.78 acres, respectively. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	
Cumulative potential effects of related or anticipated future pipeline construction	There will be a short (approximately 1,250 feet) transmission line associated with the Swatara Pump Station. Because a transmission line would also have been needed were the pump station in a different location, these types of impacts were already contemplated during the PUC permitting process. The requested modification would not result in a significant change in potential cumulative effects because the overall length and acreage of impact is insignificant relative to the scale of the whole Project.	
Relevant applicable policies, rules, and regulations of other state and federal and local government land use laws	The same policies, rules, and regulations of other state, federal and local land use laws would apply to the requested modification and the PUC Designated Route.	

## MODIFICATION NO. 9 MP 1062

#### Modification No. 9 – Milepost 1062

Enbridge requests permission for workspace outside the PUC Designated Route near MP 1062 in Aitkin County, Minnesota.

#### A. Description of Proposed Route Modification

As seen on the enclosed revised Maps 309 and 310, Enbridge seeks a modification to the PUC Designated Route near MP 1061 to 1062 in northwest Aitkin Township, Aitkin County. The requested modification consists of approximately 9,570 square feet outside of the PUC Designated Route.

#### B. Reason for Proposed Route Modification

This modification is requested to allow for the installation of cathodic ground bed at this location. Cathodic protection systems are installed to mitigate the threat of external corrosion on pipelines. Although the requested modification is outside the PUC Designated Route as described above, Enbridge's additional design and engineering work has indicated that this area will be required for the installation of the cathodic ground bed at this location because of the length of the ground bed.

#### C. Analysis of Potential Human and Environmental Impacts

Tables 9.1 and 9.2 below show the impacts of the modification being requested at MP 1062. The third column of Table 9.1 provides specific data on the area of the requested modification that is outside the PUC Designated Route. The parcel impacted by this modification was already crossed by the PUC Designated Route, and Enbridge has acquired all land rights needed for this modification. As shown on the tables below, this modification is located in a previously cleared area and thus does not result in significant impacts.

Table 9.1
<b>Analysis of Route Modification No. 9 (Milepost 1062)</b>
for the Line 3 Replacement Project

	•	Requested Modification Outside	
Resource/Category	Units	PUC Designated Route	
Total Area	Square Feet	9,570	
Length Parallel to Existing	Feet	N/A	
Rights-of-Way			
Roads Crossed	Number	0	
Parcels Crossed	Number	1	
Residences within 300 feet of	Number	0	
the Pipeline Route			
Total Impacts on Surveyed	Acres	0.00	
Wetlands			
Land Use			
Forested Land Crossed	Acres	0.05	
Agricultural Land Crossed	Acres	0.10	
Developed Land Crossed	Acres	0.08	
Wetlands Crossed <sup>a</sup>	Acres	0.00	
Open Land Crossed	Acres	0.00	

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

Table 9.2			
Route Comparison of Route Mo	odification No. 9 (Milepost 1062)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because the parcel was previously crossed by the PUC Designated Route and no new structures would be impacted by the modification.		
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would result in 0.22 acre of additional impact on a MDNR SOBS site of moderate diversity which is already crossed by the PUC Designated Route. The requested modification would also increase impacts on private lands located within the boundaries of the Hill River State Forest by 0.22 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.		
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.		
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would increase impacts on agricultural lands by 0.10 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.		
Pipeline cost and accessibility	Pipeline cost and accessibility will be similar to that of the PUC Designated Route.		
Use of existing rights-of-way and right-of-way sharing or paralleling	The requested modification is for permanent workspace only. The pipeline would continue to share and parallel an existing third-party right-of-way.		
Natural resources and features	The requested modification would increase impacts on forested lands by 0.05 acre, although visual imagery indicates that the land is partially cleared and actual impacts may be less than indicated by the GIS analysis.		

Table 9.2		
Route Comparison of Route Modification No. 9 (Milepost 1062)		
Extent to which human or environmental	Any change in impacts on regulated features	
effects are subject to mitigation by regulatory	would be reflected in permits issued for the	
control and permit conditions	Project. No new permits are required due to	
	this modification.	
Cumulative potential effects of related or	The requested modification would not result	
anticipated future pipeline construction	in a significant change in potential cumulative	
	effects because the overall length and acreage	
	of impact is insignificant relative to the scale	
	of the whole Project.	
Relevant applicable policies, rules, and	The same policies, rules, and regulations of	
regulations of other state and federal and local	other state, federal and local land use laws	
government land use laws	would apply to the requested modification	
	and the PUC Designated Route.	

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# MODIFICATION NO. 10 MP 1073

#### **Modification No. 10 – Milepost 1073**

Enbridge requests a route modification outside the PUC Designated Route near MP 1073 in Aitkin County, Minnesota.

#### A. Description of Proposed Route Modification

As seen in the enclosed revised Map 321, Enbridge seeks a route modification outside the PUC Designated Route near MP 1073 and 1074 in Cornish Township, Aitkin County. The requested modification is approximately 4,377 feet in length.

#### B. Reason for Proposed Route Modification

This modification is requested to avoid a large, heavily saturated area that presents significant constructability concerns. Enbridge conducted additional design, engineering, environmental, and landowner consultation and determined that the proposed modification would avoid a large surveyed wetland and would not present the same constructability concerns.

#### C. Analysis of Potential Human and Environmental Impacts

Tables 10.1 and 10.2 below show the impacts of the modification being requested at MP 1073. The third and fourth columns of Table 10.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification would reduce impacts on surveyed wetlands by 3.52 acres and increase impacts on forested lands by 0.15 acre, but it would deviate from an existing utility corridor. The requested modification also would avoid impacts to state-listed plants identified during field survey. This modification would impact parcels owned by Aitkin County, and Enbridge has the land rights needed for this modification.

Table 10.1 Analysis of Route Modification No. 10 (Milepost 1073)						
for the Line 3 Replacement Project						
Resource/Category	Resource/Category Units PUC Designated Route Requested Modification					
Total Length	Feet	4,181	4,377			
Length Parallel to Existing Rights-of-Way	Feet	4,181	457			
Roads Crossed	Number	0	0			
Parcels Crossed	Number	2	2			
Residences within 300 feet of the Pipeline Route	Number	0	0			
Total Impacts on Surveyed Wetlands <sup>a</sup>	Acres	5.35	1.83			
Land Use						
Forested Land Crossed	Acres	10.99	11.14			
Agricultural Land Crossed	Acres	0.00	0.00			
Developed Land Crossed	Acres	0.00	0.00			
Wetlands Crossed <sup>a</sup>	Acres	0.00	0.00			
Open Land Crossed	Acres	0.00	0.00			

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

<b>Table 10.2</b>		
Route Comparison of Route Mo		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because it is located on county-owned land and does not have any structures.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would result in 0.16 acre of additional impact within a MDNR SOBS site of high biodiversity that is already crossed by the PUC Designated Route. The requested modification would also increase impacts on county tax-forfeited lands within the Savanna State Forest by 0.16 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would increase impacts on county tax-forfeited forested lands within the Savanna State Forest by 0.16 acres. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Pipeline cost and accessibility	Pipeline cost and accessibility will be similar to that of the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	This modification would reduce the amount of right-of-way sharing or paralleling by approximately 3,724 feet to avoid a large saturated wetland area.	
Natural resources and features	The requested modification would reduce impacts on surveyed wetlands by 3.52 acres and would increase impacts on forested lands by 0.15 acre. The requested modification also would avoid impacts to state-listed plants identified during field survey.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	

<b>Table 10.2</b>		
Route Comparison of Route Modification No. 10 (Milepost 1073)		
Cumulative potential effects of related or	The requested modification would not result	
anticipated future pipeline construction	in a significant change in potential cumulative	
	effects because the overall length and acreage	
	of impact is insignificant relative to the scale	
	of the whole Project.	
Relevant applicable policies, rules, and	The same policies, rules, and regulations of	
regulations of other state and federal and local	other state, federal and local land use laws	
government land use laws	would apply to the requested modification	
	and the PUC Designated Route.	

## MODIFICATION NO. 11 MP 1095

#### **Modification No. 11 – Milepost 1095**

Enbridge requests a route modification outside the PUC Designated Route near MP 1095 in St. Louis County, Minnesota.

#### A. Description of Proposed Route Modification

As seen in the enclosed revised Map 343, Enbridge seeks a route modification outside the PUC Designated Route near MP 1095 in Floodwood Township, St. Louis County. The requested modification is approximately 2,422 feet in length.

#### B. Reason for Proposed Route Modification

This modification is requested in response to a landowner request to move the Project's route westerly near the Gowan Pump Station location. Enbridge proposes this specific modification after consulting with affected landowners.

#### C. Analysis of Potential Human and Environmental Impacts

Tables 11.1 and 11.2 below show the impacts of the modification being requested at MP 1095. The third and fourth columns of Table 11.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification would increase impacts on agricultural lands by 0.40 acre and would increase impacts on surveyed wetlands and forested areas by 0.46 and 0.75 acre, respectively. These impacts are not anticipated to be significant when balanced against accommodating the landowner's request. All changes are within property owned by Enbridge, with the exception of a portion of the modification in the northeast corner of the map (labeled T-167-1 on the map), and that will be located in existing road right-of-way.

<b>Table 11.1</b>				
Analysis of Route Modification No. 11 (Milepost 1095)				
Resource/Category	for the Line 3 Replacement Project			
Total Length	Units Feet	PUC Designated Route 2,228	Requested Modification 2,422	
Length Parallel to Existing Rights-of-Way	Feet	2,228	1,749	
Roads Crossed	Number	2	1	
Parcels Crossed	Number	5	9	
Residences within 300 feet of the Pipeline Route	Number	0	0	
Total Impacts on Surveyed Wetlands	Acres	0.16	0.62	
Land Use				
Forested Land Crossed	Acres	1.17	1.92	
Agricultural Land Crossed	Acres	2.92	3.32	
Developed Land Crossed	Acres	0.89	0.76	
Wetlands Crossed <sup>a</sup>	Acres	0.00	0.00	
Open Land Crossed	Acres	0.00	0.00	

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

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<b>Table 11.2</b>		
Route Comparison of Route Modification No. 11 (Milepost 1095)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features; however, it would address a landowner request.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	The requested modification would have no additional impact on these features.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would increase impacts on agricultural lands by 0.40 acre. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Pipeline cost and accessibility	This modification will increase pipeline cost slightly because of the increased length of the requested modification when compared to the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	This modification would reduce the amount of right-of-way sharing or paralleling by approximately 479 feet to accommodate a landowner request.	
Natural resources and features	The requested modification would increase impacts on surveyed wetlands and forested areas by 0.46 and 0.75 acre, respectively. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Any change in impacts on regulated features would be reflected in permits issued for the Project. No new permits are required due to this modification.	
Cumulative potential effects of related or anticipated future pipeline construction	The requested modification would not result in a significant change in potential cumulative effects because the overall length and acreage of impact is insignificant relative to the scale of the whole Project.	

<b>Table 11.2</b>		
Route Comparison of Route Modification No. 11 (Milepost 1095)		
Relevant applicable policies, rules, and	The same policies, rules, and regulations of	
regulations of other state and federal and loca	other state, federal and local land use laws	
government land use laws	would apply to the requested modification	
	and the PUC Designated Route.	

## MODIFICATION NO. 12 MP 1117

#### **Modification No. 12 – Milepost 1117**

Enbridge requests a route modification outside the PUC Designated Route near MP 1117 in Twin Lakes Township, Carlton County.

#### A. Description of Proposed Route Modification

As seen on the enclosed revised Maps 366 and 367, Enbridge seeks a modification to the PUC Designated Route between MP 1117 in Twin Lakes Township, Carlton County and 1118. The requested modification is approximately 5,165 feet in length.

#### B. Reason for Proposed Route Modification

Enbridge requests this modification for the crossing of I-35 to allow for an optimal crossing of that interstate and to be co-located with the existing Lines 67, 13, and 4 pipelines in this area. This modification would avoid a residence and waterbody present on this segment of the PUC Designated Route.

#### C. Analysis of Potential Human and Environmental Impacts

Tables 12.1 and 12.2 below show the impacts of the modification being requested at MP 1117. The third and fourth columns of Table 12.1 provide environmental data on the applicable portion of the PUC Designated Route and the requested modification. As shown on the tables below, this modification would increase impacts on surveyed wetlands and forested areas by 3.00 acres. The requested modification would reduce impacts on agricultural lands by 0.87 acre. The requested modification is co-located with existing Enbridge pipelines in this area. Other than the modification's crossing of the MDNR-administered Willard Munger State Trail (which is also crossed by the PUC Designated Route), Enbridge has acquired all land rights needed for this modification. The Willard Munger Trail crossing was included in Enbridge's 2018 application for a License to Cross Public Lands, which was updated and resubmitted to the MDNR on December 20, 2019.

Table 12.1 Analysis of Route Modification No. 12 (Milepost 1117)			
Resource/Category Units PUC Designated Route Requested Modification			
Total Length	Feet	4,488	5,165
Length Parallel to Existing Rights-of-Way	Feet	4,488	5,165
Roads Crossed	Number	4	4
Parcels Crossed	Number	9	8
Residences within 300 feet of the Pipeline Route	Number	2	2
Total Impacts on Surveyed Wetlands	Acres	4.00	7.00
Land Use			
Forested Land Crossed	Acres	6.00	9.00
Agricultural Land Crossed	Acres	2.41	1.54
Developed Land Crossed	Acres	2.81	3.20
Wetlands Crossed <sup>a</sup>	Acres	0.00	0.00
Open Land Crossed	Acres	0.00	0.00

<sup>&</sup>lt;sup>a</sup> Wetland acres presented here were developed using GAP land cover data (*see* Attachment A). This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

56

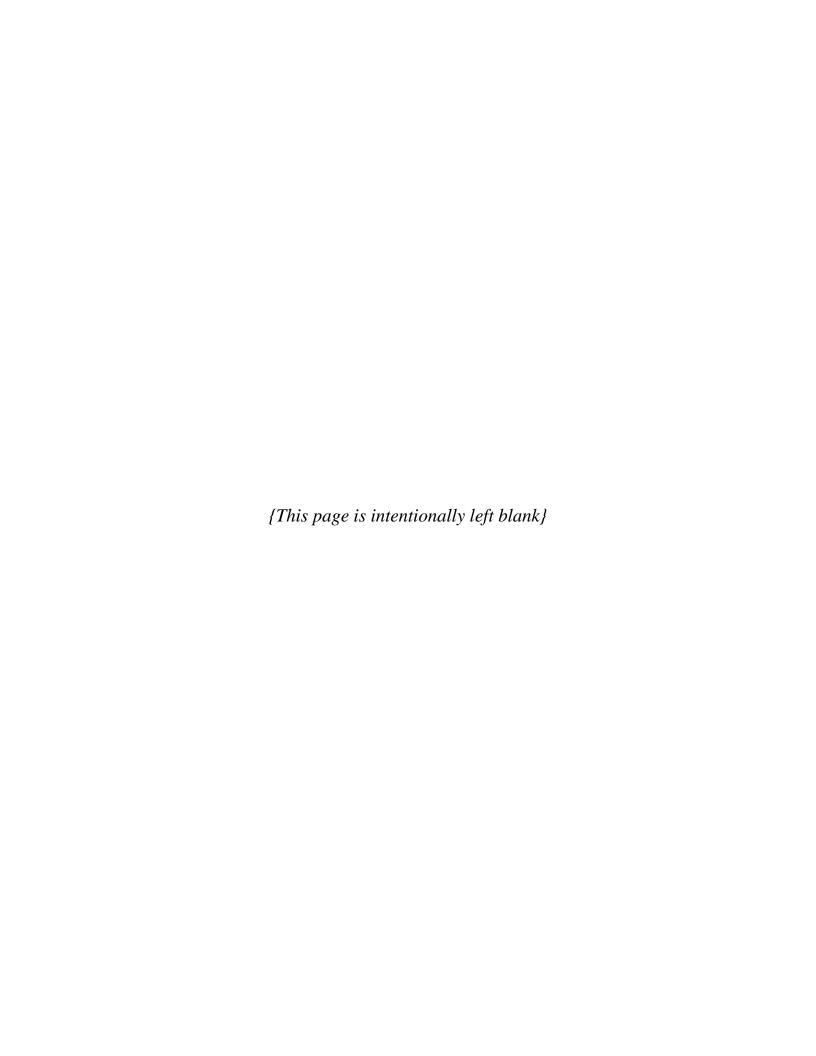
<b>Table 12.2</b>		
Route Comparison of Route Modification No. 12 (Milepost 1117)		
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	The requested modification would have no additional impact on these features because the same number of residences is located within 300 feet of the pipeline and none of the structures are impacted.	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	Both the PUC Designated Route and the proposed modification cross the Willard Munger State trail, although the crossings occur in different locations. The requested modification would result in 0.86 acre of additional impact to a MNDR SOBS site of moderate diversity. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	
Lands of historical, archaeological, and cultural significance	Based on Enbridge's survey and the TCR Survey, no lands of historical, archeological, or cultural significance would be impacted by construction along the requested modification.	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	The requested modification would reduce impacts on agricultural lands by 0.87 acre.	
Pipeline cost and accessibility	This modification will increase pipeline cost slightly because of the increased length of the requested modification when compared to the PUC Designated Route.	
Use of existing rights-of-way and right-of-way sharing or paralleling	Both the PUC Designated Route and the requested modification parallel existing Enbridge pipelines; the requested modification parallels the rights-of-way for Enbridge's Lines 67, 13, and 4.	
Natural resources and features	The requested modification would increase impacts on surveyed wetlands and forested areas by 3.00 acres. These types of impacts were previously contemplated in the PUC permitting process and do not have the potential to significantly impact these resources.	

<b>Table 12.2</b>		
Route Comparison of Route Modification No. 12 (Milepost 1117)		
Extent to which human or environmental	Any change in impacts on regulated features	
effects are subject to mitigation by regulatory	would be reflected in permits issued for the	
control and permit conditions	Project. No new permits are required due to	
	this modification.	
Cumulative potential effects of related or	The requested modification would not result	
anticipated future pipeline construction	in a significant change in potential cumulative	
	effects because the overall length and acreage	
	of impact is insignificant relative to the scale	
	of the whole Project.	
Relevant applicable policies, rules, and	The same policies, rules, and regulations of	
regulations of other state and federal and local	other state, federal and local land use laws	
government land use laws	would apply to the requested modification	
	and the PUC Designated Route.	

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## Attachment A

**Data Sources** 



The following data sources were used to complete the analyses contained in the tables included in this filing. For the purposes of these analyses, a feature is considered crossed if it intersects with the construction workspace for the requested modification.

Table x.1			
	Source Table		
Analysis of R	oute Modific	eation for the Line 3 Replacement Project	
Resource/Category <sup>a</sup>	Units	Source	
Total Length	Feet	Measured from point where modification deviates from centerline shown in Route Permit to point where it rejoins centerline shown in Route Permit using GIS software.	
Length Parallel to Existing Rights-of-Way	Feet	Enbridge civil and cadastral survey	
Roads Crossed	Number	Enbridge civil and cadastral survey	
Parcels Crossed	Number	Enbridge civil and cadastral survey	
Residences within 300 feet of the Pipeline Route	Number	Enbridge civil and cadastral survey and aerial imagery	
Total Impacts on Surveyed Wetlands	Acres	Enbridge wetland survey data	
Land Use			
Forested Land Crossed	Acres	GAP Land Cover: <a href="https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects">https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects</a>	
Agricultural Land Crossed	Acres	GAP Land Cover: <a href="https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects">https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects</a>	
Developed Land Crossed	Acres	GAP Land Cover: <a href="https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science center objects=0#qt-science_center_objects">https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects</a>	
Wetlands Crossed <sup>b</sup>	Acres	GAP Land Cover: <a href="https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects">https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects</a>	
Open Land Crossed	Acres	GAP Land Cover: <a href="https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects">https://www.usgs.gov/gapanalysis/land-cover-data-download?qt-science_center_objects=0#qt-science_center_objects</a>	

<sup>&</sup>lt;sup>a</sup> For this analysis, "crossed" means the features intersects with the proposed construction workspace for the modification.

<sup>&</sup>lt;sup>b</sup> Wetland acres presented here were developed using GAP land cover data. This data should be used for land use data comparison purposes only. Actual wetland impacts based on survey data are presented in the "Total Impacts on Surveyed Wetlands" row, above.

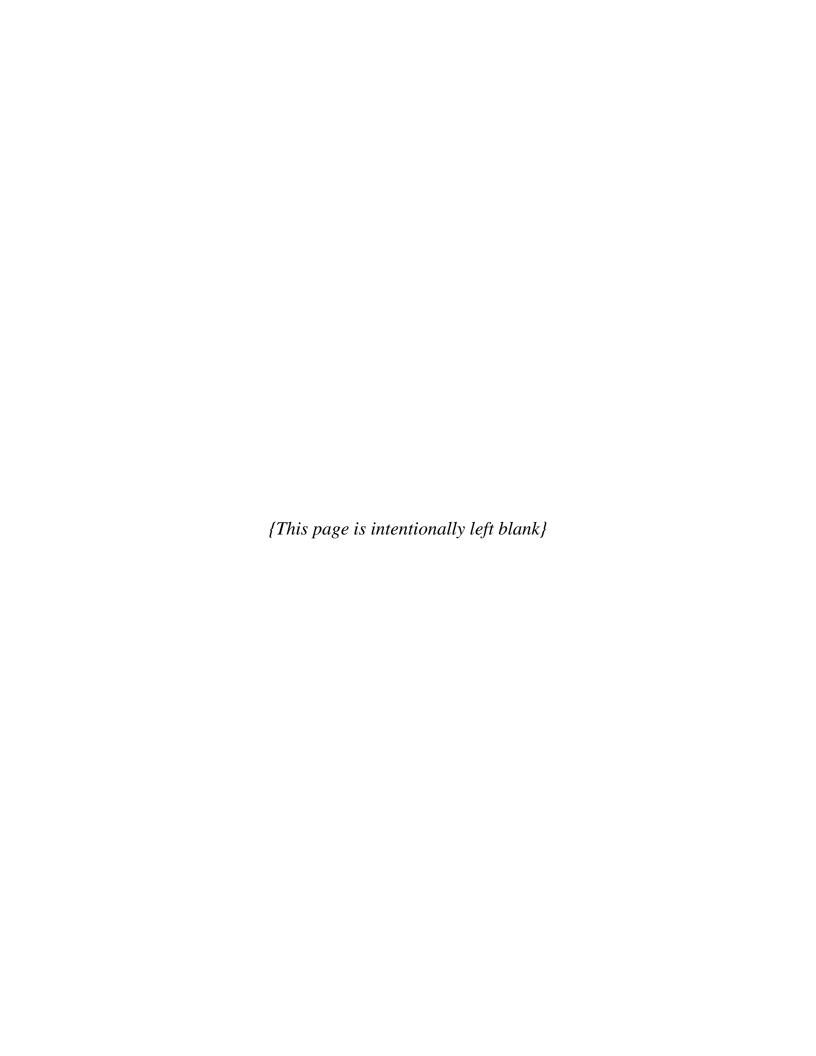
Table x.2		
Route Comparison of Route Modification		
H-m-m	Source	
Human settlement, existence and density of populated areas, existing and planned future land use, and management plans	<ul> <li>Review of aerial imagery and presence or absence of evidence of human settlement (homes, fencing, structures)</li> <li>Residences within 300 feet of the proposed pipeline route (table x.1)</li> </ul>	
Natural environment, public and designated lands, including but not limited to natural areas, wildlife habitat, water, and recreational lands	<ul> <li>Minnesota Public Waters Inventory Wetlands, Basins, and Watercourses: <a href="https://gisdata.mn.gov/dataset/water-mn-public-waters">https://gisdata.mn.gov/dataset/water-mn-public-waters</a></li> <li>USFWS conservation easements and wetlands: obtained through consultation and <a href="https://www.fws.gov/gis/data/CadastralDB/links_cadastral.html">https://www.fws.gov/gis/data/CadastralDB/links_cadastral.html</a></li> <li>Minnesota DNR State Forest Boundaries: <a href="https://gisdata.mn.gov/dataset/bdry-state-forest">https://gisdata.mn.gov/dataset/bdry-state-forest</a></li> <li>Minnesota DNR Fee Surface Administered Land (forestry, wildlife, parks and trails, water access sites, and other Minnesota DNR-administered lands): <a href="https://gisdata.mn.gov/dataset/bdry-dnr-managed-areas">https://gisdata.mn.gov/dataset/bdry-dnr-managed-areas</a></li> <li>MCBS Sites of Biodiversity Significance: <a href="https://gisdata.mn.gov/dataset/trans-sites-of-biodiversity">https://gisdata.mn.gov/dataset/biota-mcbs-sites-of-biodiversity</a></li> <li>Snowmobile Trails: <a href="https://gisdata.mn.gov/dataset/trans-state-trails-minnesota">https://gisdata.mn.gov/dataset/trans-state-trails-minnesota</a></li> </ul>	
Lands of historical, archaeological, and cultural significance	<ul> <li>Enbridge cultural resource field survey results</li> <li>Tribal cultural resource field survey reports</li> </ul>	
Economies within the route, including agricultural, commercial or industrial, forestry, recreational, and mining operations	<ul> <li>GAP Land Cover – "Agricultural Land Crossed" (see table x.1)</li> <li>GAP Land Cover – "Forested Land Crossed" (see table x.1)</li> <li>Minnesota DNR State Forest Boundaries:         <ul> <li><a href="https://gisdata.mn.gov/dataset/bdry-state-forest">https://gisdata.mn.gov/dataset/bdry-state-forest</a></li> </ul> </li> <li>Minnesota DNR Fee Surface Administered Land (forestry, wildlife, parks and trails, and other Minnesota DNR-administered lands) and County Tax Forfeit lands: <a href="https://gisdata.mn.gov/dataset/bdry-dnr-managed-areas">https://gisdata.mn.gov/dataset/bdry-dnr-managed-areas</a></li> <li>Aerial imagery for features such as gravel pits</li> </ul>	
Pipeline cost and accessibility	Enbridge Construction and Engineering review of the PUC     Designated Route compared to modification. Access roads, constructability concerns, waterbody avoidance, and landowner request were among the factors considered.	
Use of existing rights-of- way and right-of-way sharing or paralleling	Enbridge civil and cadastral survey.	

Table x.2 Route Comparison of Route Modification			
Natural resources and features	<ul> <li>Enbridge surveyed wetlands (see table x.1, "Total Impacts on Surveyed Wetlands")</li> <li>GAP Land Cover – "Forested Land Crossed" (see table x.1)</li> <li>Aerial imagery to verify evident land use data discrepancies</li> <li>Enbridge protected flora field survey results</li> <li>Minnesota Natural Heritage Information System data: Available by license only</li> </ul>		
Extent to which human or environmental effects are subject to mitigation by regulatory control and permit conditions	Review of activities against current permitting efforts. No permit conditions are known at the time of survey.		
Cumulative potential effects of related or anticipated future pipeline construction	Length and acreage of modification, considered in relation to the total impacts of the Project		
Relevant applicable policies, rules, and regulations of other state and federal and local government land use laws	Review of activities against applicable regulations		

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## Attachment B

USFWS April 10, 2018 letter





### United States Department of the Interior



#### FISH AND WILDLIFE SERVICE

Tamarac National Wildlife Refuge 35704 County Highway 26 Rochert, Minnesota 56578-9638 Phone: 218/847-2641 Fax: 218/847-9141

April 10, 2018

Enbridge Inc. Ms. Sara Ploetz 26 East Superior Street Duluth, MN 55802

Dear Ms. Ploetz:

Thank you for the opportunity to review Enbridge's Line 3 pipeline replacement proposal. This project crosses three properties in Clearwater County with U.S. Fish and Wildlife Service (FWS) wetland conservation easements. FWS wetland conservation easements provide valuable habitat for migratory birds, especially waterfowl and prohibit protected wetlands from being burned, drained, filled or leveled. The subject properties are located as follows:

T.146N, R.37W, Section 12, N1/2SW1/4, NW1/4SE1/4 and S1/2NE1/4

T.148N, R.37W, Section 17, S1/2NW1/4 and N1/2SW1/4

T.148N, R.37W, Section 17, S1/2SW1/4

We have reviewed the subject proposal and have determined that the pipeline installation and associated construction as planned, will avoid FWS wetland easement interests by constructing around protected wetland basins, or be confined to prior existing rights of way acquired by Enbridge before the acquisition of the wetland conservation easement. A field review of all three properties will be conducted this spring that will aid in identifying any problem areas or unforeseen impacts to wetlands before construction begins.

In the spirit of cooperation, our organizations have agreed to incorporate the following Cooperative Conservation Measures to minimize impacts to FWS easement wetlands lying within the existing pipeline right of way.

#### Cooperative Conservation Measures

- 1. When possible, timing of construction will coincide with fall or winter periods to avoid impacts to nesting and breeding wildlife.
- 2. Dewatering of wetlands will be avoided or minimized to the extent possible.
- 3. Back-filling operations will involve placement of soil into original horizons to the extent possible.
- 4. Excess fill from pipeline trenching operations will be removed from the wetland basin after back-filling/compaction is complete.

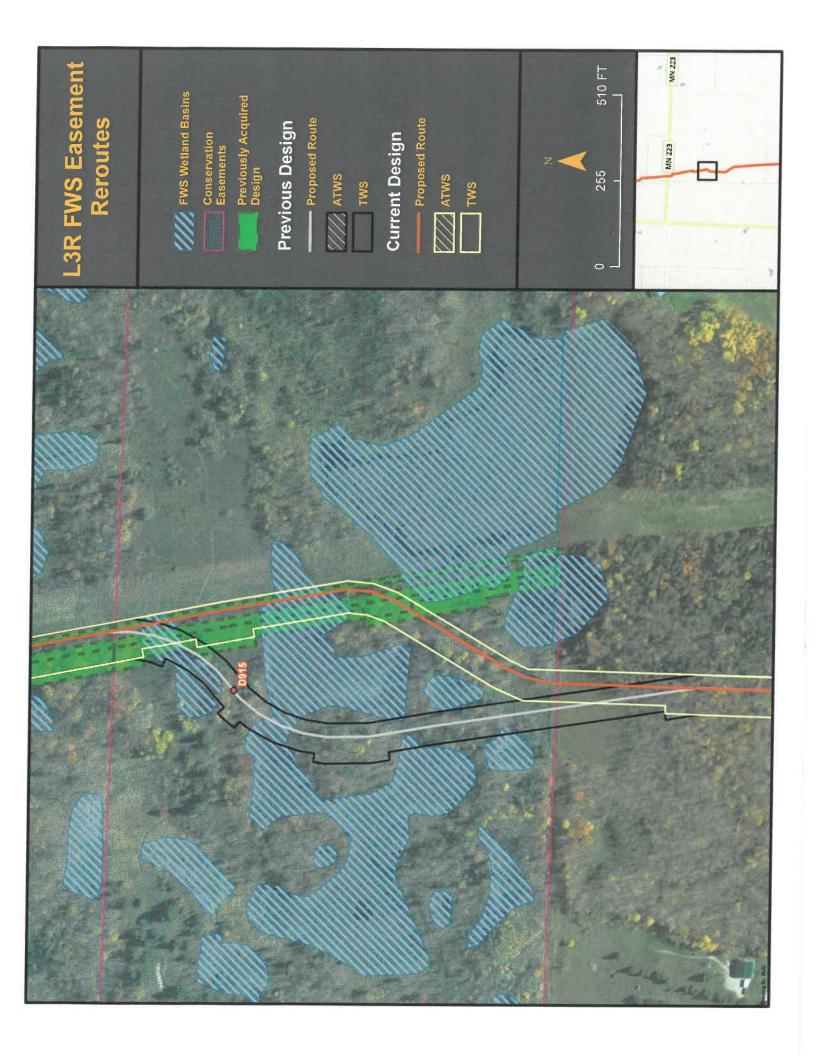
- 5. Trench Breakers or other similar strategies will be implemented upstream and downstream of wetlands with open trenching operations to prevent artificial drainage or sedimentation of the wetland.
- 6. Trees, other organic material or construction debris will not be buried or piled within wetland basins.
- 7. Enbridge will consult with FWS regarding construction operations that have the potential to impact trees with known active nests.
- 8. FWS may provide technical assistance if cultural resources are encountered while crossing properties with FWS wetland conservation easements.

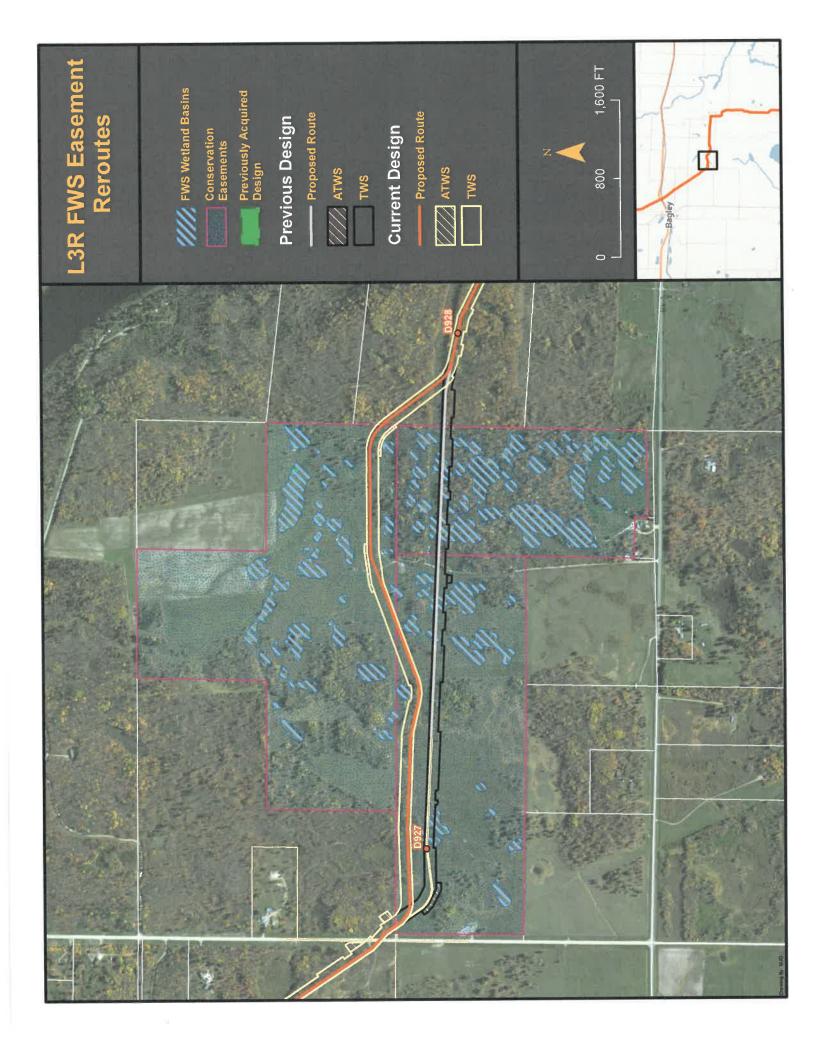
As a reference, I have enclosed the maps previously provide by Enbridge of the three properties depicting the pipeline corridor and wetlands protected by the conservation easement.

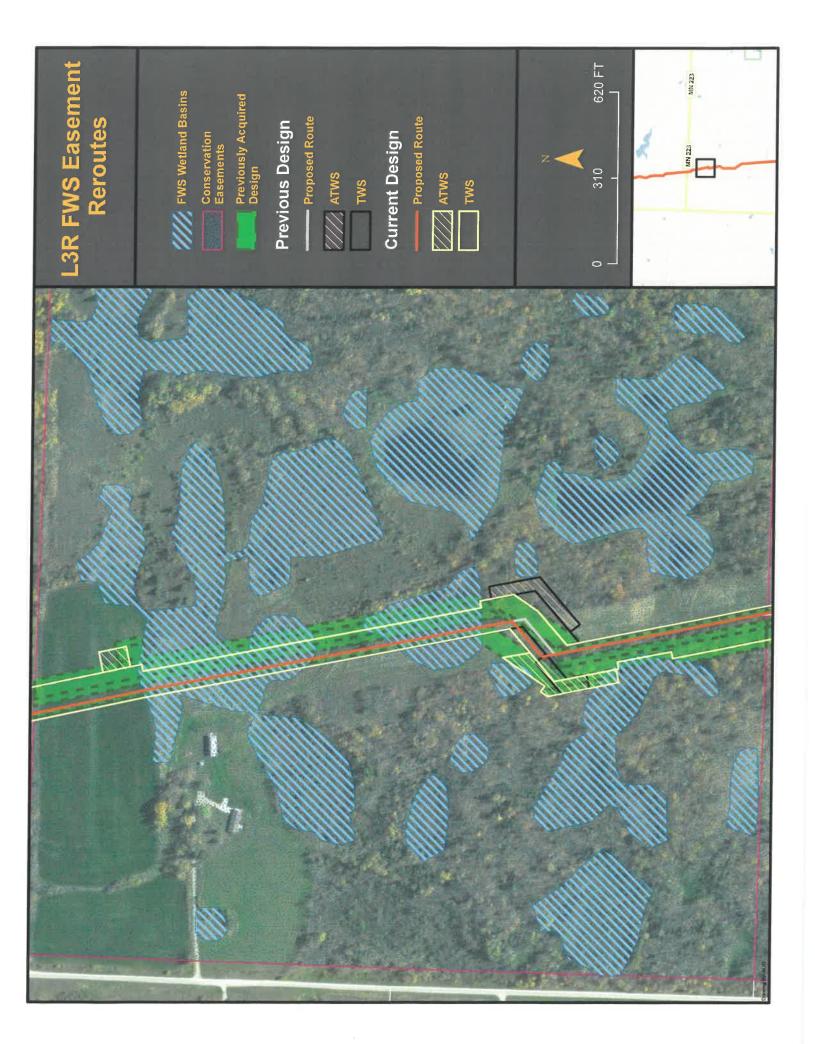
Thank you for your cooperation and efforts to consider alternatives that avoid and minimize impacts to wetlands along the pipeline corridor. We appreciate the opportunity to work closely with you throughout the review process of this project and look forward to visiting again after snowmelt. In the meantime, please feel free to contact me with any questions or concerns regarding the subject tracts or the U.S. Fish and Wildlife Service's wetland conservation easement program.

Sincerely,

Neil J. Powers Project Leader

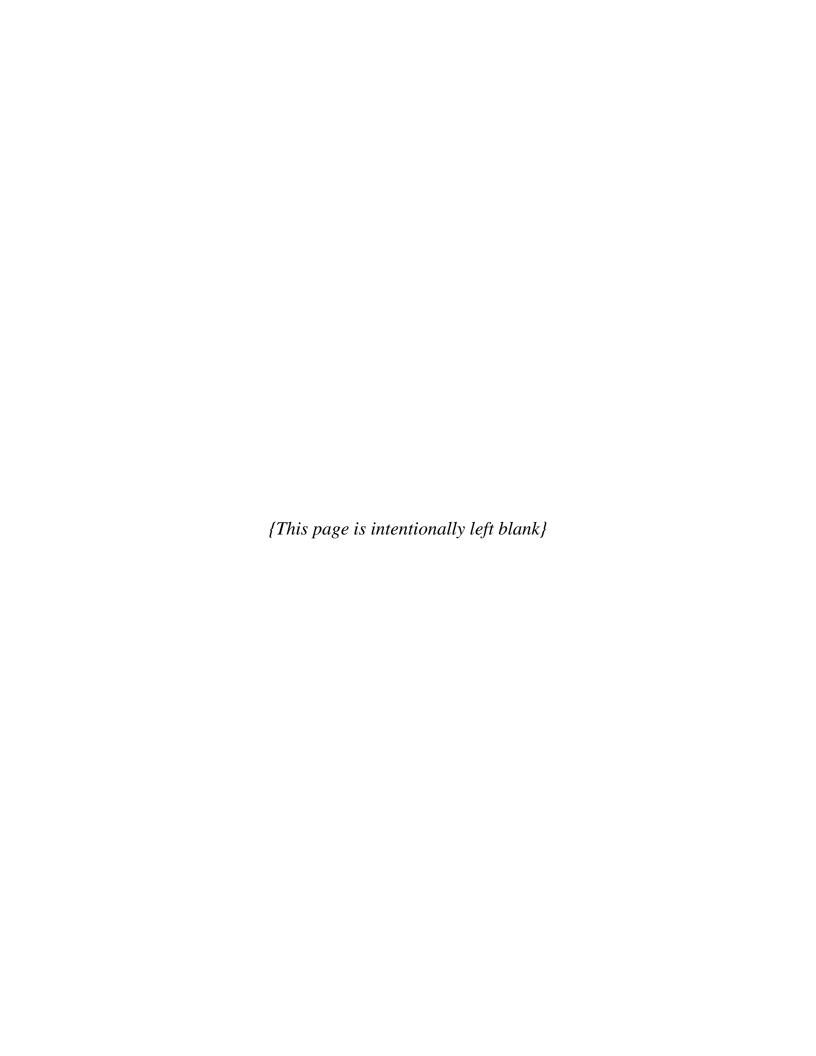






## **Attachment C**

Mailing List of Affected Landowners



Landowner Mailing List - Enbridge Route Permit Amendment Request PL-9/PPL-15-137 Bonnie J Oien Anderson Donald D Arro Bayle Bellefy 22688 320th Street 5424 30th Street SE 4866 Hinglely Road Bemidji, MN 56601 Floodwood, MN 55736 Bagley, MN 56621 Lynn M and Mark L Bellefy Arnette and Kenneth Ray Borowicz Greg Borowicz P O Box 257 22960 320TH Street PO Box 344 Stephen, MN 56757 Stephen, MN 56757 Bagley, MN 56621 Loretta Borowicz **Greg Borowicz Borowicz Farms** Christopher J and Kelly N Brauhn PO Box 344 P O Box 257 20929 280th Street North Stephen, MN 56757 Ulen, MN 56585 Stephen, MN 56757 C & G Gift Estate Trust **Brett David Wendy Dawn Carter** JoNette and Scott Corrow 527 Tower Street Northwest 22275 Walkerbrook Drive 535 Jackson Street Southwest Clearbrook, MN 56634-4290 Bagley, MN 56621-4745 Hutchinson, MN 55350 Mary Ann Durand Adam E Fradenburgh Jeffrey R and Mary J Gryskiewicz PO Box 263 1120 Park Ave NW 31382 360 Street Northwest Bemidji, MN 56601 Stephen, MN 56757 Argyle, MN 56713 North Dakota Pipeline Company, Hvidsten Farms Nadene N and Victor R Lopez PO Box 329 2055 Yndestad Road HC Stephen, MN 56757 Carlton, MN 55718 119 North 25th Street East Superior, WI 54880 Julie Pawloski Alvin and Nancy Oien Elizabeth and Rodney Pawloski 21407 340th Street 3427 Dailey Street PO Box 263 Phoenix, AZ 85053 Bagley, MN 56621 Stephen, MN 56757 Larry L and Penni L Pietz Douglas A Rasch Kathy A Rasch 58085 320th Place 43003 191ST Avenue 43003 191ST Avenue Palisade, MN 56469 Clearbrook, MN 56634 Clearbrook, MN 56634 Linda Rasmussen Nancy A Solem-Reisinger State of Minnesota 717 Island View Drive 975 Trettle Lane 100 Rev Dr Martin Luther King Jr

State of Minnesota, Department of Natural Resources 1201 East Highway 2

Grand Rapids, MN 55744

Bemidji, MN 56601

State of Minnesota, Department Of Transportation District 2A 1123 Mesaba Avenue Duluth, MN 55811

Cloquet, MN 55720

Janelle Sundby 2001 Eastwood Drive#102 Thief River Falls, MN 56701

Saint Paul, MN 55155

Boulevard

## Landowner Mailing List - Enbridge Route Permit Amendment Request PL-9/PPL-15-137

Betty J Surdez 23845 320TH ST Bagley, MN 56621 Mark W and Rose Surdez 23845 320TH Street Bagley, MN 56621 Paul L Surdez 23845 320TH Street Bagley, MN 56621

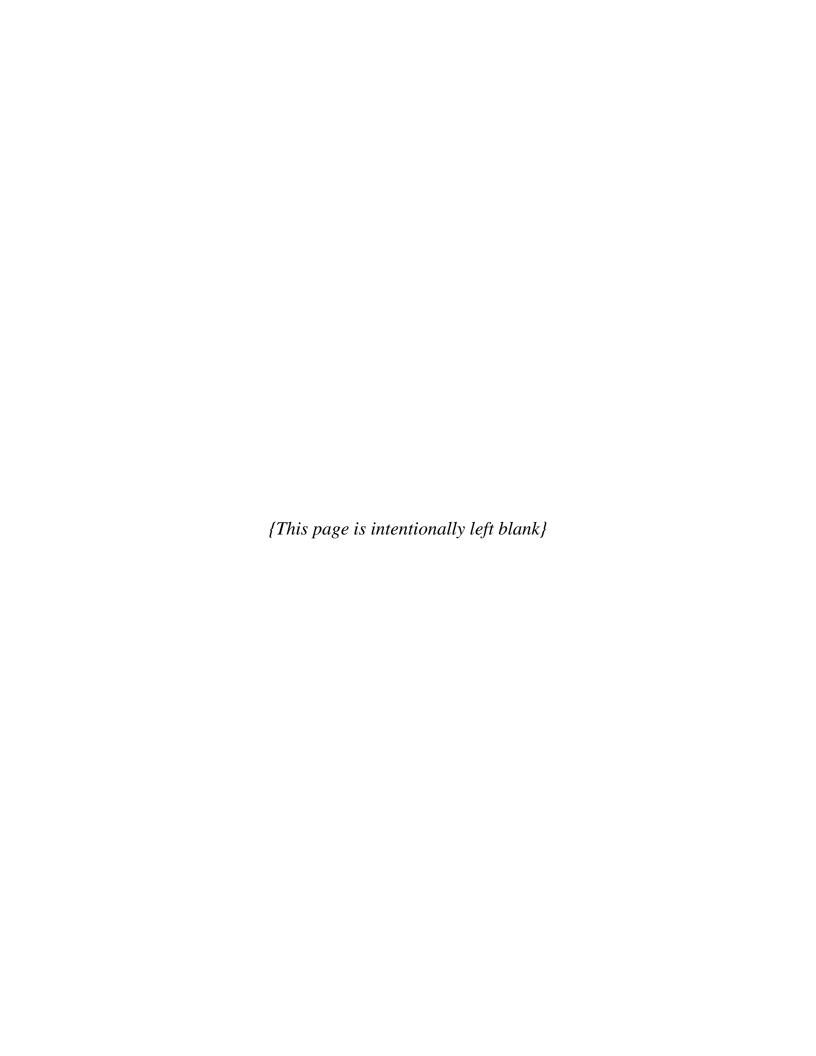
Tri-State Holdings, LLC 119 North 25th Street East Superior, WI 54880 Jessica L and John A Jr. Tuttle 1412 John Road Cloquet, MN 55720 Leeann L Vettleson 42794 181ST Avenue Clearbrook, MN 56634

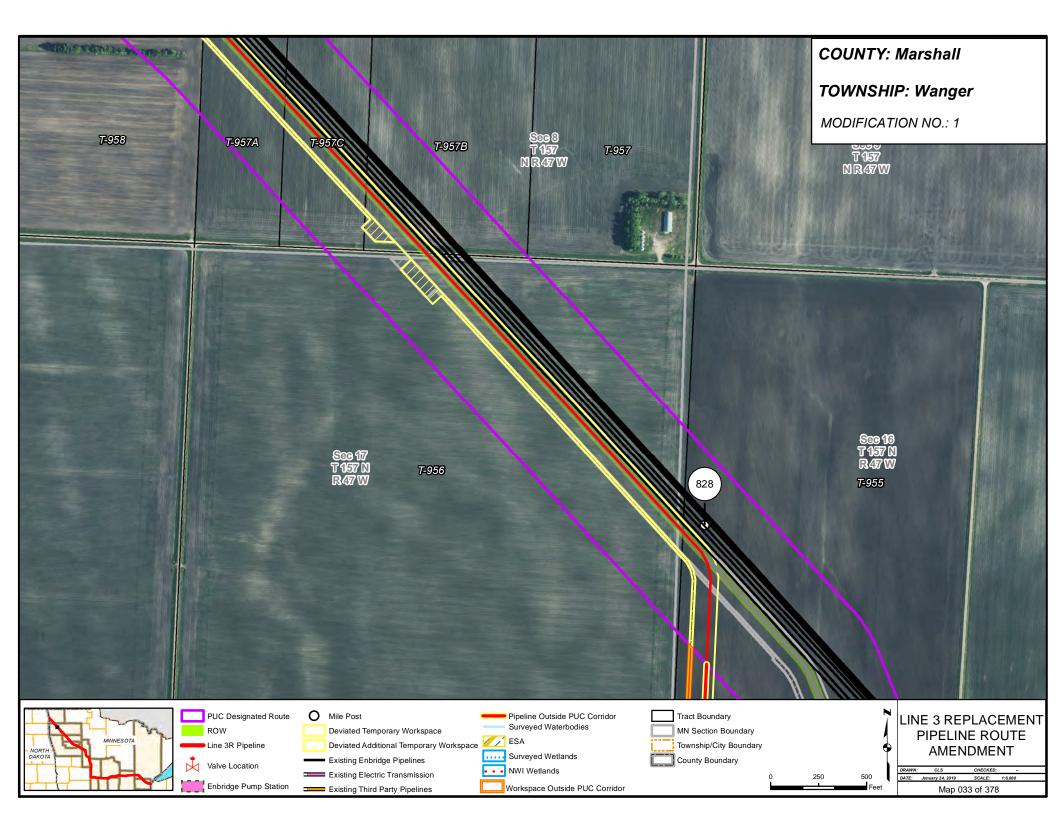
Travis A Vettleson 42794 181ST Avenue Clearbrook, MN 56634 Dennis P and Kathy D Waller 2080 Yndestad Road Carlton, MN 55718 Terri Lynn Wittwer 11050 Bush Road Floodwood, MN 55736

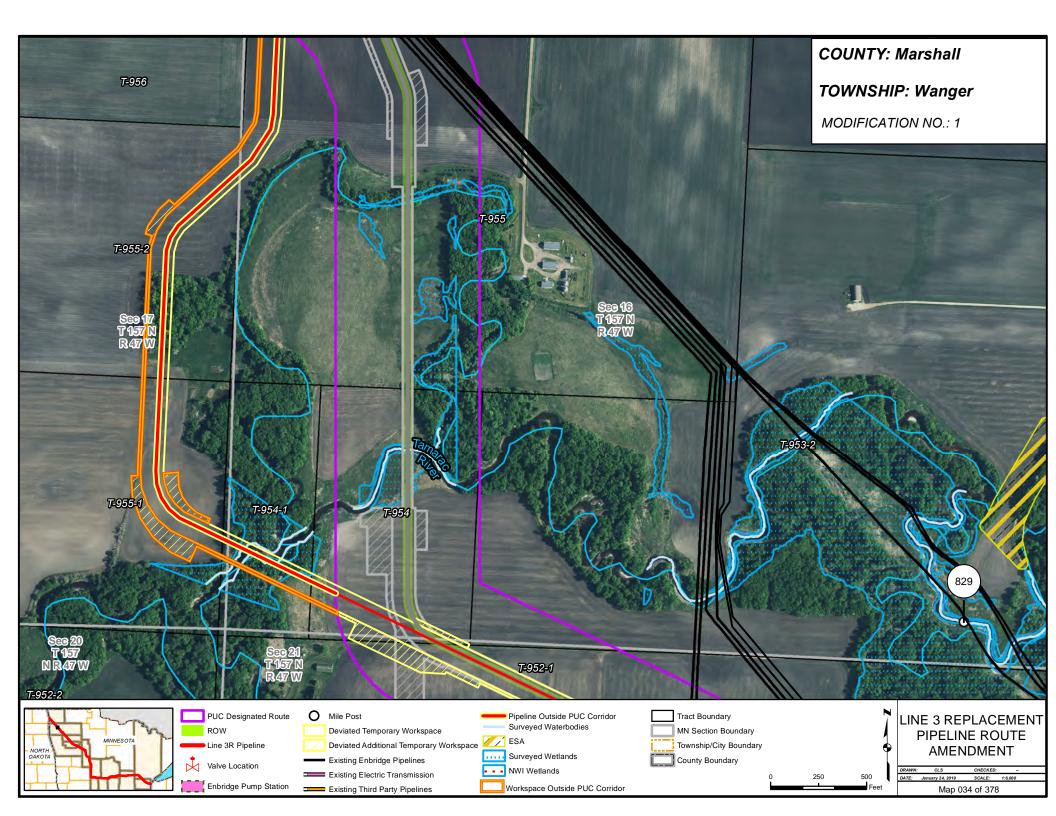
Dale W and Lori A Zylka 2102 Yndestad Road Carlton, MN 55718

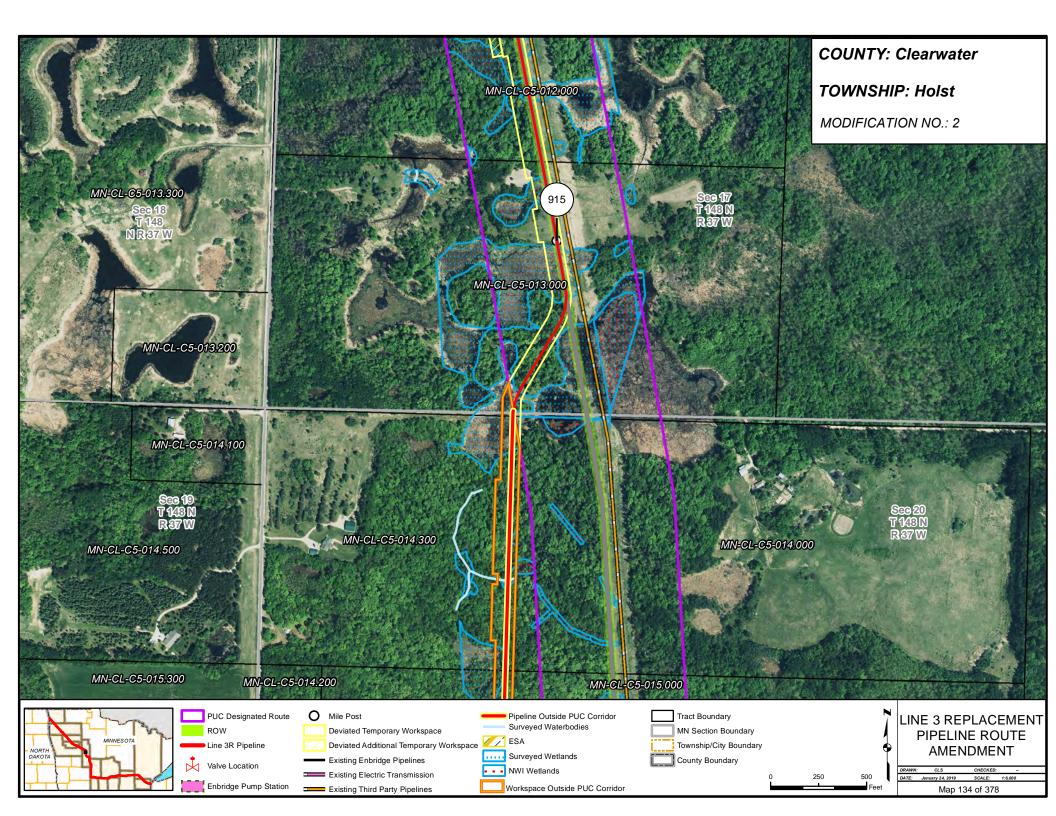
## **Attachment F**

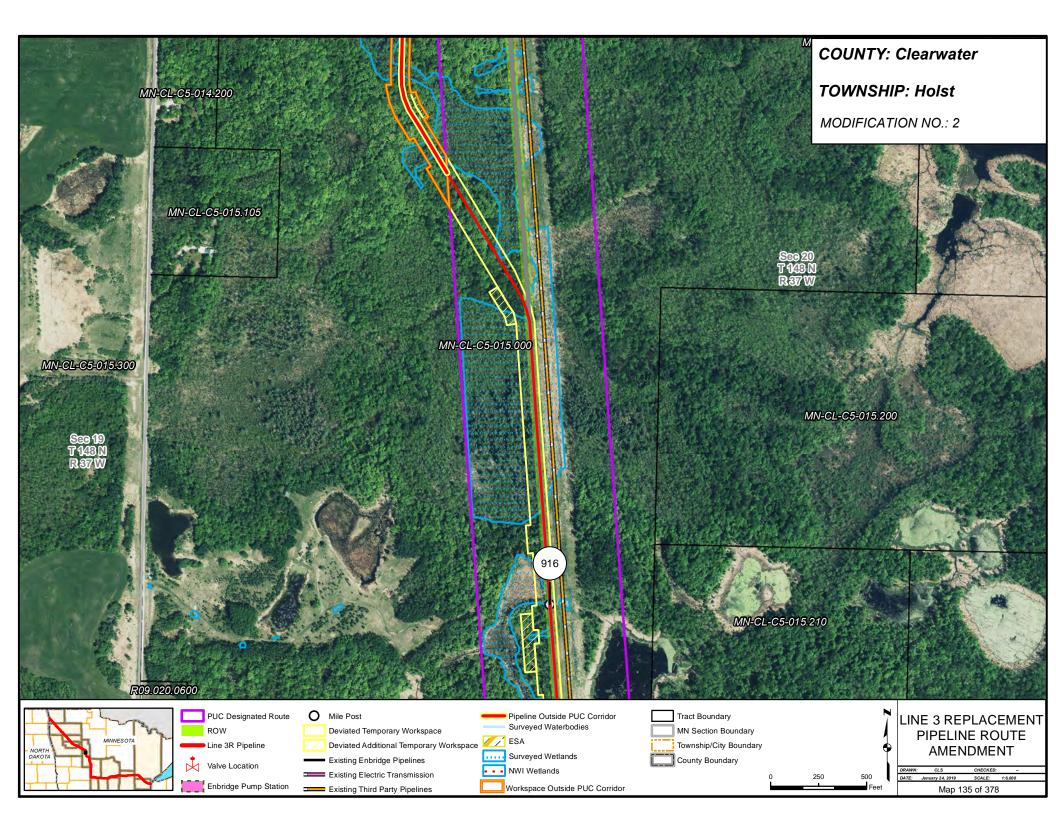
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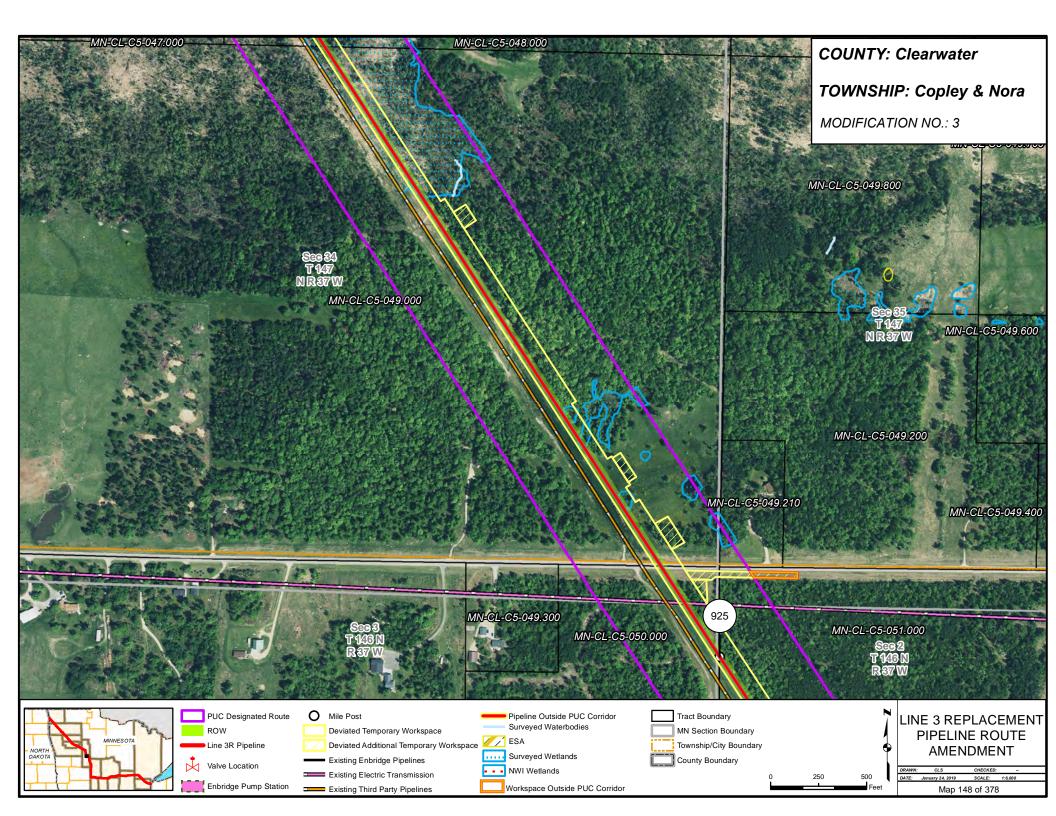


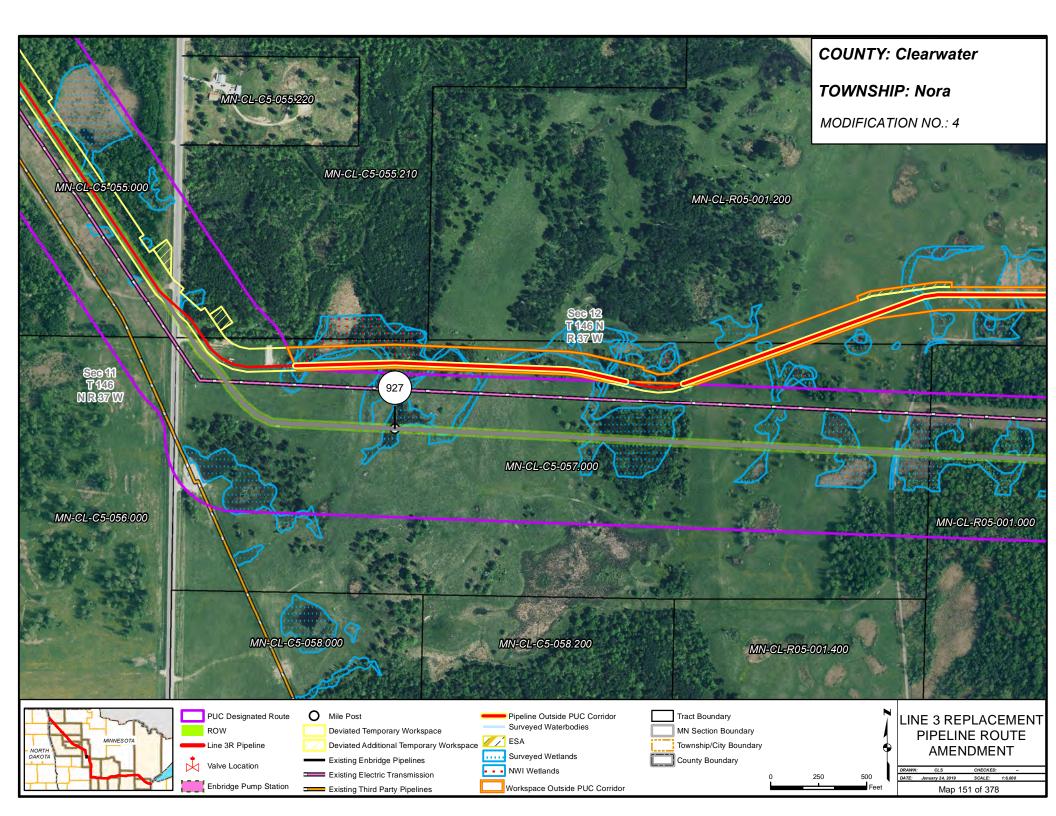


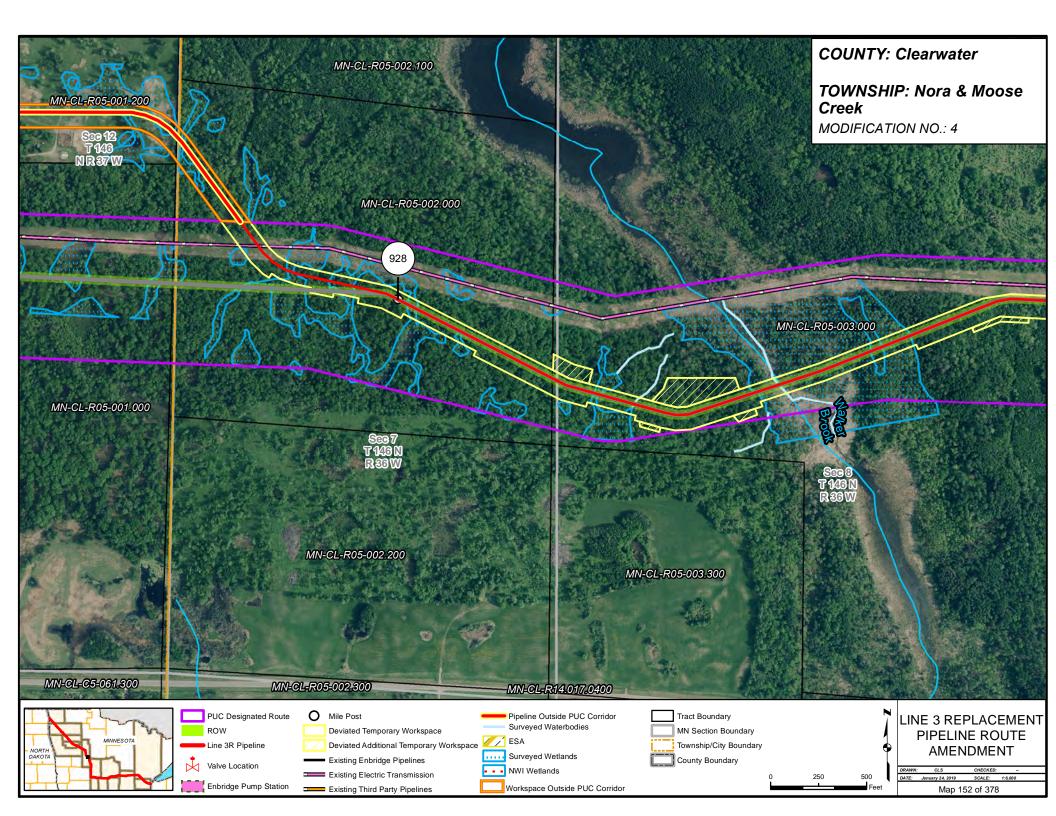


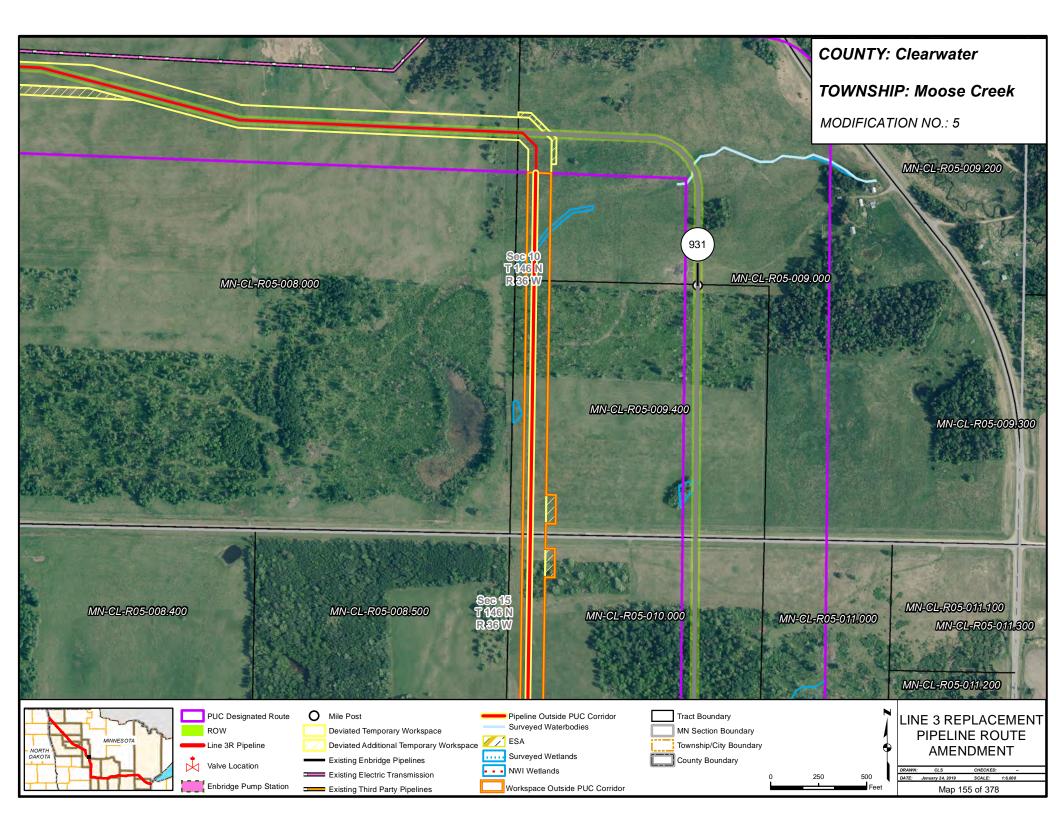


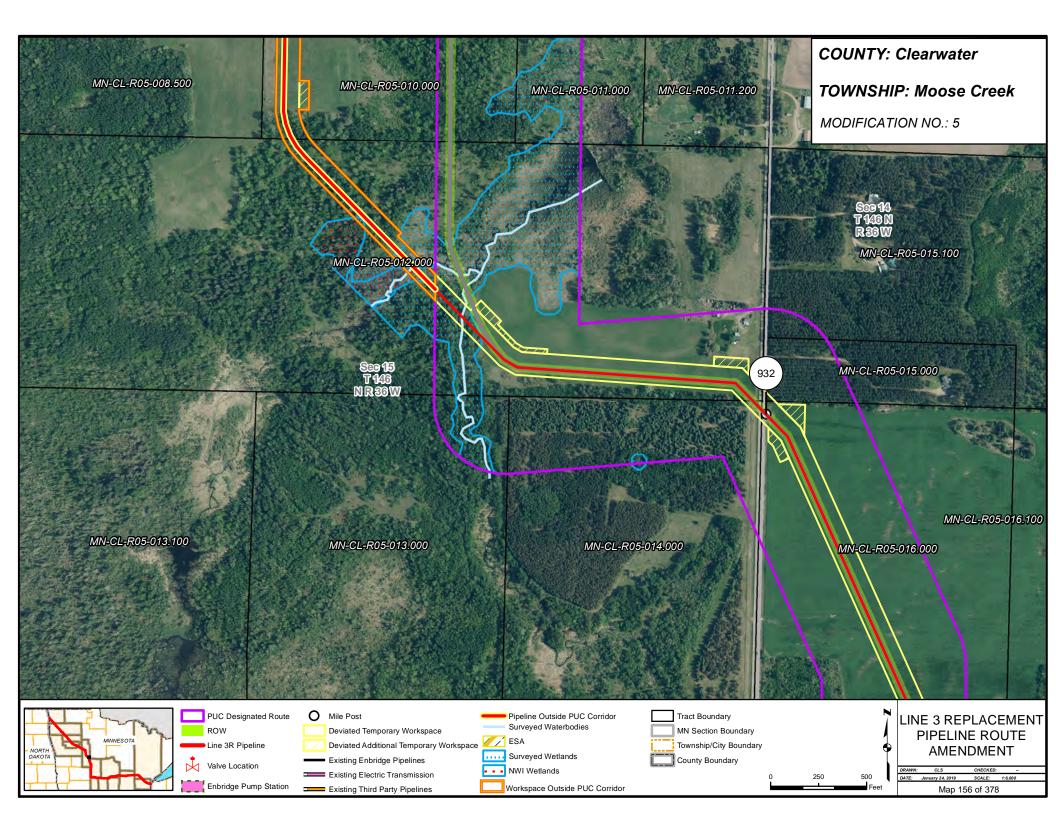


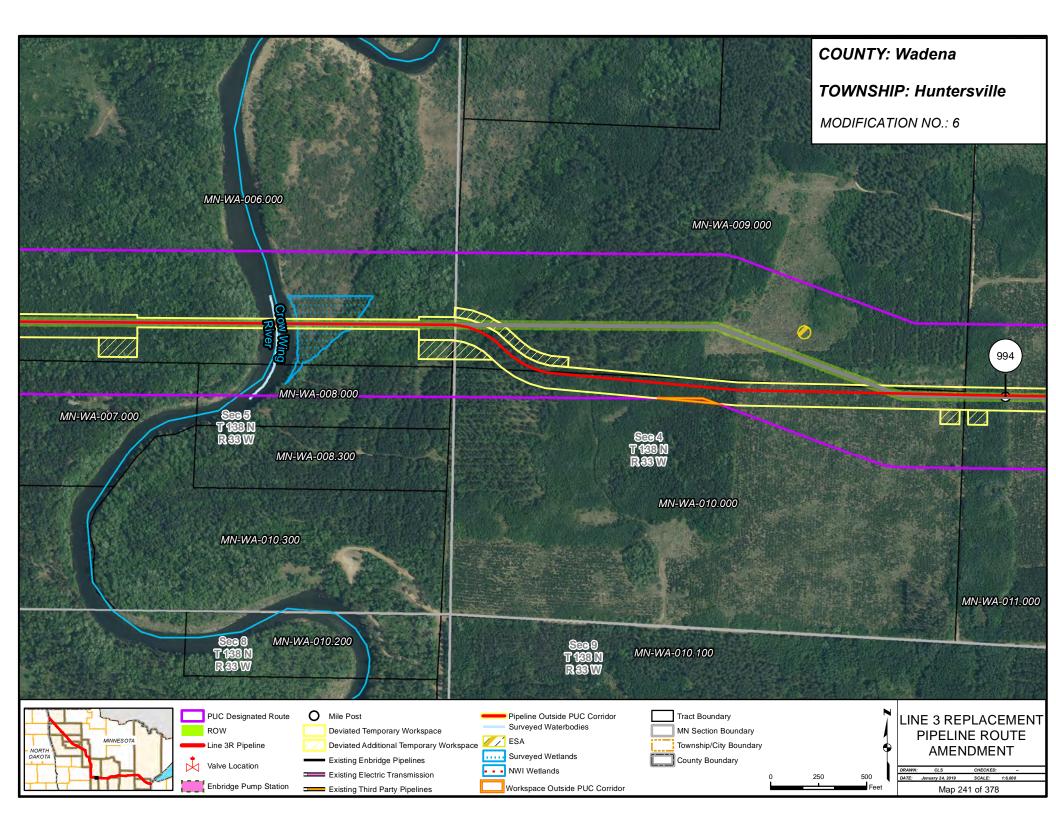


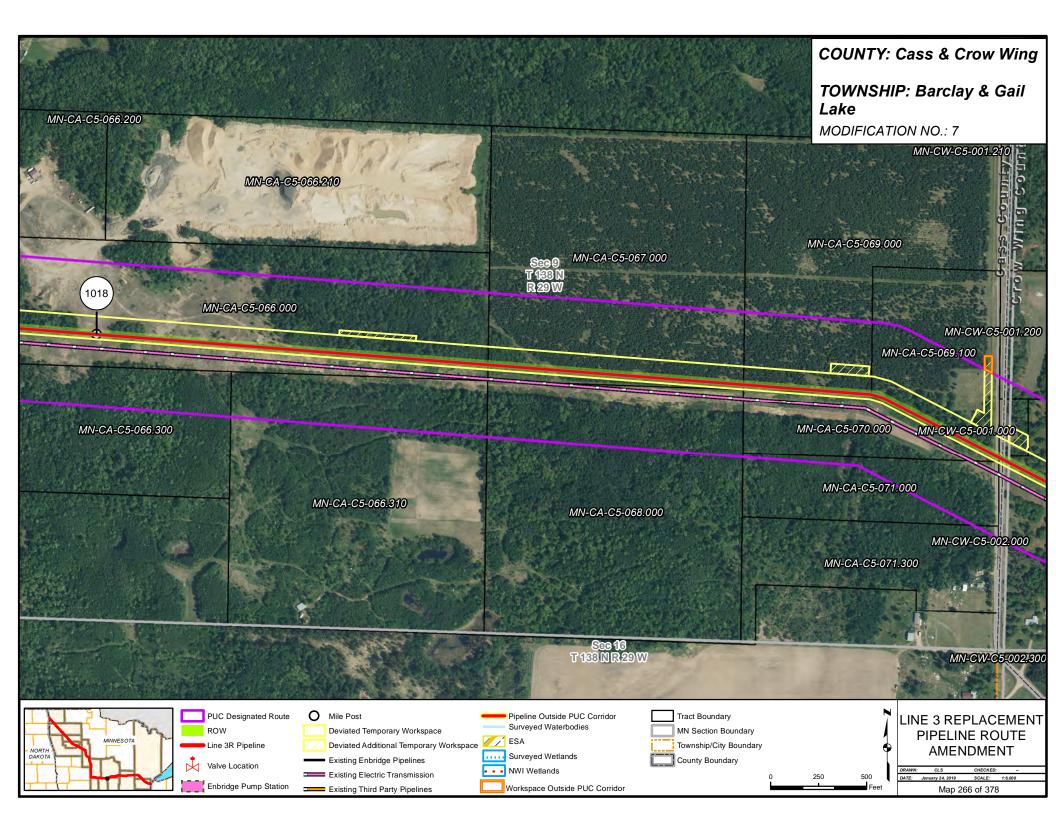


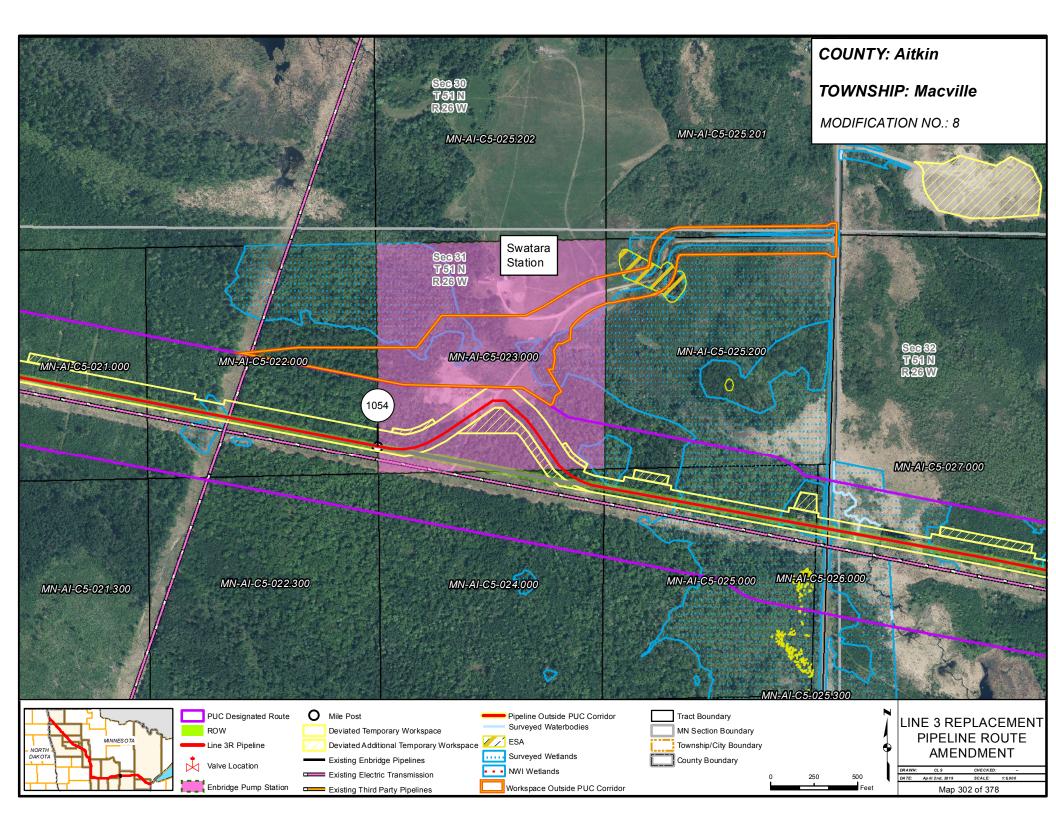


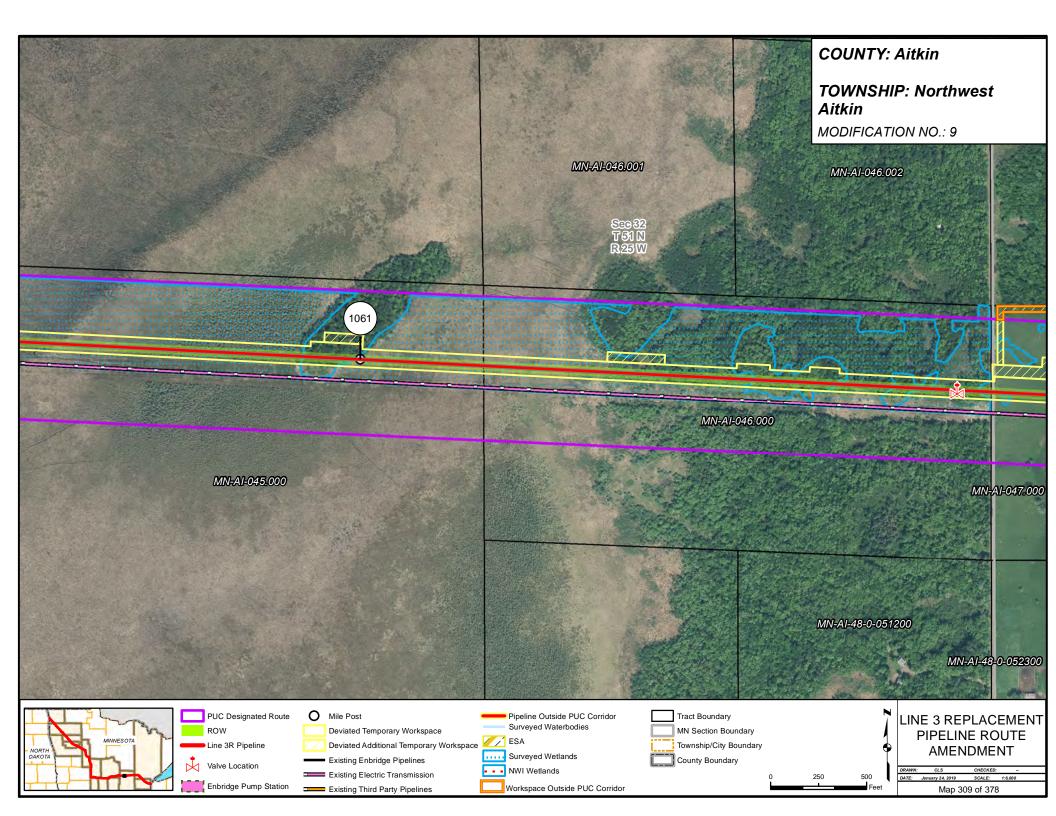


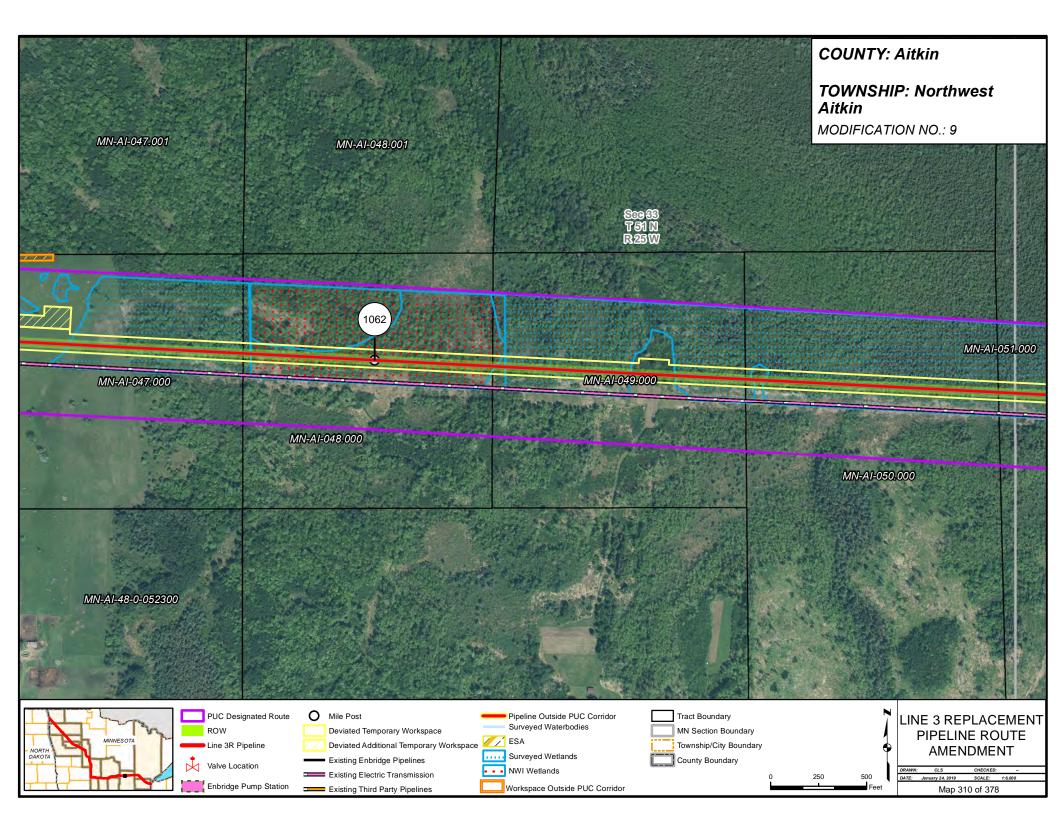


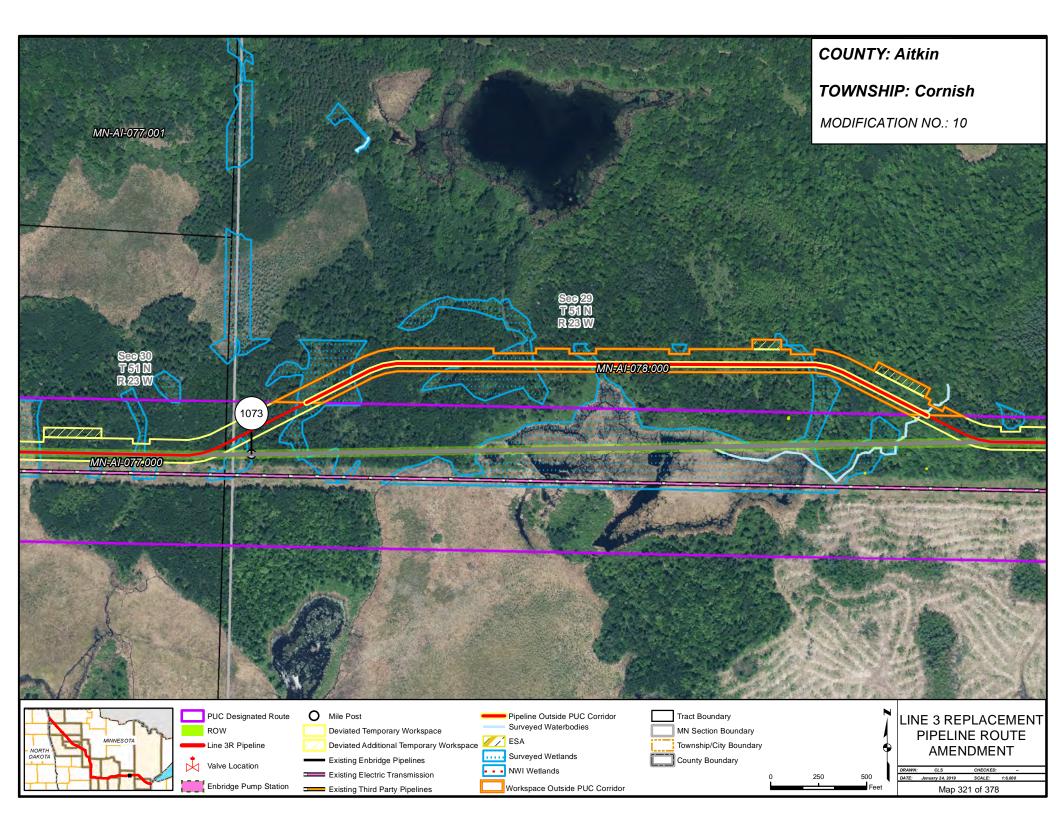


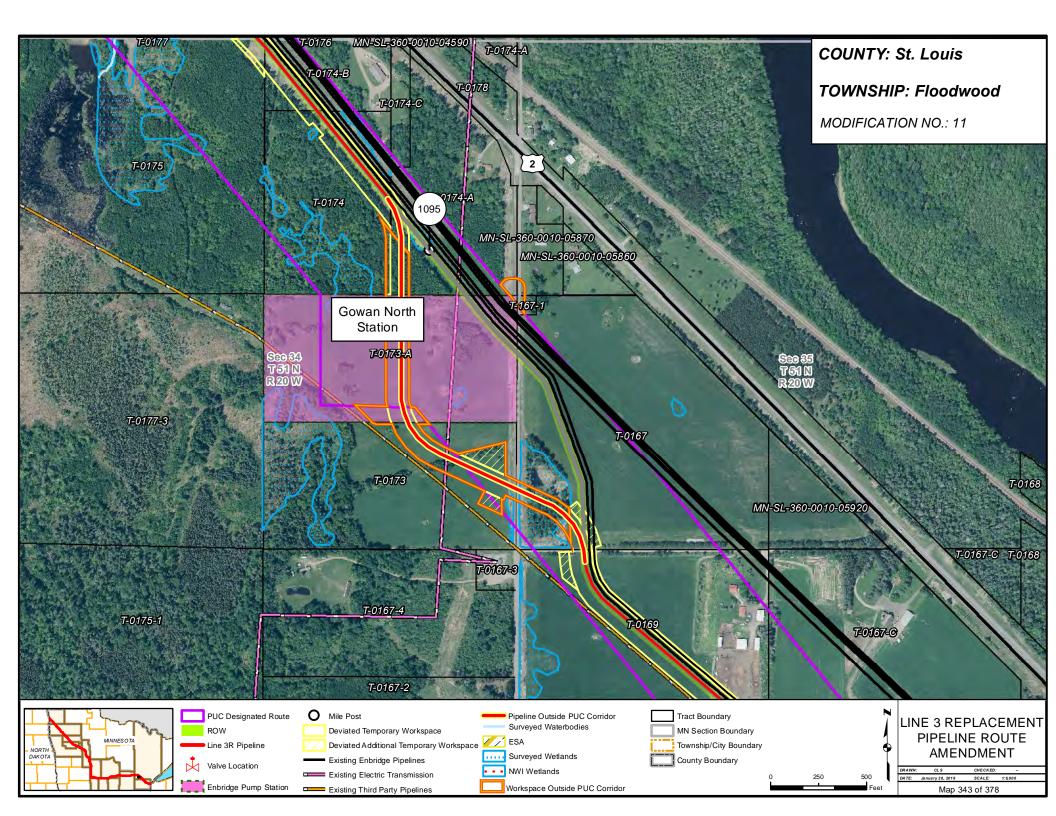


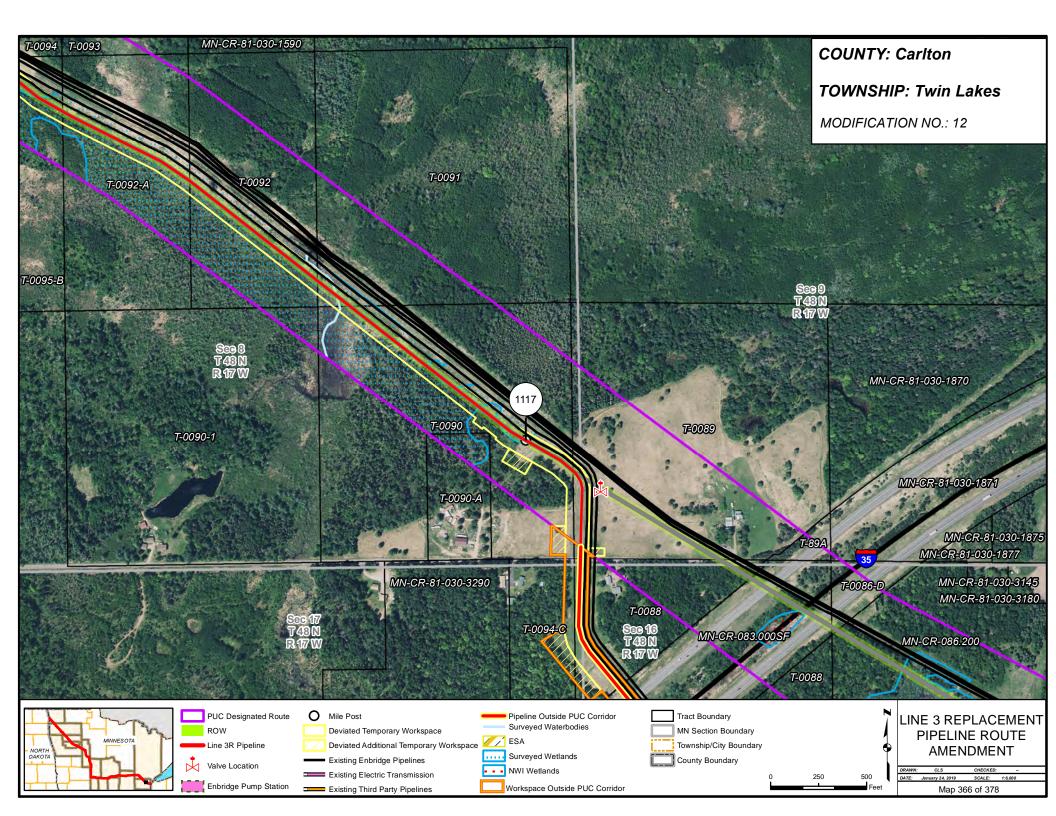


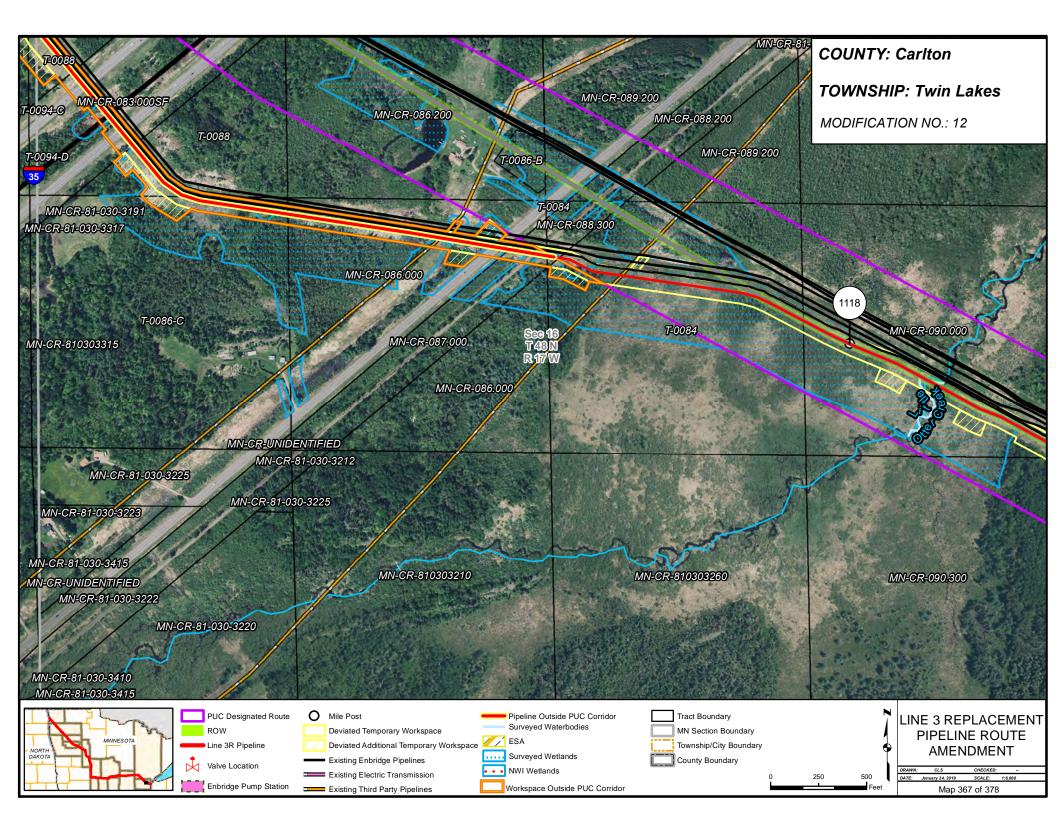












In the Matter of the Application of Enbridge Energy, Limited Partnership for a Pipeline Route Permit for the Line 3 Replacement Project in Minnesota from the North Dakota Border to the Wisconsin Border

MPUC Docket No. PL-9/PPL-15-137

## CERTIFICATE OF SERVICE

- I, Katelyn Benz, hereby certify that I have this day, served true and correct copies of the following documents to all persons at the addresses indicated on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at Minneapolis, Minnesota.
  - 1. Cover Letter
  - 2. Application for Approval of Route Width Variations and Permit Amendment with Attachments A-D

Dated this 5th day of May, 2020.

/s/Katelyn Benz

69935515 v1

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Ahern	ahern.michael@dorsey.co m	Dorsey & Whitney, LLP	50 S 6th St Ste 1500  Minneapolis, MN 554021498	Electronic Service	No	OFF_SL_15-137_Official
Kenneth	Barker	kenneth.barker@centurylin k.com	Centurylink Communications, LLC	100 CenturyLink Drive  Monroe, LA 71203	Electronic Service	No	OFF_SL_15-137_Official
Sarah	Beimers	sarah.beimers@state.mn.u s	Department of Administration - State Historic Preservation Office	50 Sherburne Avenue Suite 203 St. Paul, MN 55155	Electronic Service	No	OFF_SL_15-137_Official
Brian	Bell	bell.brian@dorsey.com	Dorsey & Whitney LLP	50 South Sixth St. Suite 1500 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-137_Official
Frank	Bibeau	frankbibeau@gmail.com	White Earth Band of Ojibwe	51124 County Road 118  Deer River, Minnesoa 56636	Electronic Service	No	OFF_SL_15-137_Official
Seth	Bichler	sethbichler@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Rd  Cloquet, MN 55720	Electronic Service	No	OFF_SL_15-137_Official
Paul	Blackburn	paul@honorearth.org		PO Box 63  Callaway, MN 56521	Electronic Service	Yes	OFF_SL_15-137_Official
Paul	Blackburn	paul@paulblackburn.net		PO Box 17234  Minneapolis, MN 55417	Electronic Service	No	OFF_SL_15-137_Official
Ellen	Boardman	eboardman@odonoghuela w.com	O'Donoghue & O'Donoghue LLP	5301 Wisconsin Ave NW Ste 800 Washington, DC 20015	Electronic Service	No	OFF_SL_15-137_Official
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-137_Official
Dan	Chapman	Daniel.Chapman@xcelener gy.com		N/A	Electronic Service	No	OFF_SL_15-137_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400	Electronic Service	Yes	OFF_SL_15-137_Official
				St. Paul, MN 55101			
Brendan	Cummins	brendan@cummins- law.com	Cummins & Cummins, LLP	1245 International Centre 920 Second Avenue S Minneapolis, MN 55402	Electronic Service outh	No	OFF_SL_15-137_Official
Randall	Doneen	randall.doneen@state.mn.u s	Department of Natural Resources	500 Lafayette Rd, PO Box 25 Saint Paul, MN 55155	Electronic Service	No	OFF_SL_15-137_Official
lohn E.	Drawz	jdrawz@fredlaw.com	Fredrikson & Byron, P.A.	Suite 4000 200 South Sixth Stree Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-137_Official
Donovan	Dyrdal	dyr-valley@hughes.net		13142 180TH ST NW  Thief River Falls, Minnesota 56701	Electronic Service	No	OFF_SL_15-137_Official
Kate	Fairman	kate.frantz@state.mn.us	Department of Natural Resources	Box 32 500 Lafayette Rd St. Paul, MN 551554032	Electronic Service	No	OFF_SL_15-137_Official
_eili	Fatehi	leili@advocatepllc.com	Sierra Club	4849 12th Ave S  Minneapolis, MN 55417	Electronic Service	Yes	OFF_SL_15-137_Official
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-137_Official
Rachel	Freeman	rachel.freeman@scotiaban k.com	Global Equity Research	40 King St. W. 65th Floor Toronto, ON, CANADA M5W 2X6	Electronic Service	No	OFF_SL_15-137_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Anna	Friedlander	afriedlander@odonoghuela w.com	O'Donoghue & O'Donoghue LLP	5301 Wisconsin Ave NW Suite 800 Washington, DC 20016	Electronic Service	No	OFF_SL_15-137_Officia
Thomas	Hingsberger	thomas.j.hingsberger@usace.army.mil	Corps of Engineers, St. Paul District	180 5th St E Ste 700  Saint Paul,  MN  55101	Electronic Service	No	OFF_SL_15-137_Officia
Kari	Howe	kari.howe@state.mn.us	DEED	332 Minnesota St, #E200 1ST National Bank Blo St. Paul, MN 55101	Electronic Service lg	No	OFF_SL_15-137_Officia
Samuel	Jackson	sam@cummins-law.com		1245 International Centre 920 Second Ave Sout Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-137_Official
Arshia	Javaherian	arshia.javaherian@enbridg e.com	Enbridge Energy	26 East Superior Street Suite 309 Duluth, MN 55802	Electronic Service	No	OFF_SL_15-137_Officia
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	No	OFF_SL_15-137_Officia
Hudson	Kingston	hudson@advocatepllc.com	Advocate PLLC	4849 12th Ave S  Minneapolis, MN 55414	Paper Service	No	OFF_SL_15-137_Officia
Ray	Kirsch	Raymond.Kirsch@state.mn .us	Department of Commerce	85 7th Place E Ste 500  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-137_Officia
Anthony	Kit	a.kit@kghl.net		2828 N Harwood St Suite 1240 Dallas, TX 75202	Electronic Service	No	OFF_SL_15-137_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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