

To: Katrina Hapka, Environmental Quality Board

Fr: Peg Furshong, CURE

Date: 9 November 2021

RE: Heartland Greenway Carbon Pipeline Petition for an EAW

Please find the attached petition, signatures and supporting material.

We look forward to hearing from you that you have confirmed our complete petition request.
Feel free at anytime to contact us with any questions you may have.

Peg Furshong | peg@cureriver.org

Anne Borgendale | anne@cureriver.org



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office phone | 320-269-2984

PETITION FOR ENVIRONMENTAL ASSESSMENT WORKSHEET

Regarding Navigator CO₂ Ventures' Heartland Greenway project, to construct a pipeline network to transport carbon dioxide through Minnesota farmlands and waterways and deliver it to Illinois for underground storage or additional industrial applications such as enhanced oil extraction

The Minnesota Environmental Policy Act (MEPA) Minn. Stat. § 116D.04, subd. 2a(c), and Minnesota Rules 4410.1100, gives citizens of Minnesota the right to petition for environmental review. The undersigned individuals therefore petition for preparation of an Environmental Assessment Worksheet (EAW) on Navigator CO₂ Ventures' Heartland Greenway project ("the Project"). Petitioners believe that the facts below clearly show that this project "may have the potential for significant environmental impacts" and that, accordingly, the Environmental Quality Board (EQB) is required to order an EAW under the MEPA.¹

This Project cannot be segmented so as to avoid full MEPA review. The Project involves phased and connected actions, parts of a larger interstate pipeline network, and must be assessed together with the entirety of the Project contemplated by Navigator CO₂ Ventures (Navigator). Because of their lack of capacity to assess climate change impacts, inexperience with environmental review of pipelines, as well as their inability to account for all extra-jurisdictional impacts, it would be inappropriate for any local government to be an RGU on the Project.

This petition lays out the information required by Minnesota Rules 4410.1100, subp. 2,² in the order dictated by the rule.

A. Description of the proposed project.

Navigator is developing a project called Heartland Greenway. The Project includes CO₂ capture facilities at various ethanol plants in Minnesota, crossing the border into Iowa, and joining a pipeline system stretching across several other Midwest states. Lateral pipelines would be constructed to gather the captured CO₂ from ethanol facilities to mainline pipelines that would transport the CO₂ to Illinois where it would be injected into geologic formations (or potentially used for enhanced oil recovery).

CO₂ pipelines for this type of project typically transport extremely cold high-pressure CO₂ in liquid form can range in size from six inches to two feet in diameter. In Minnesota, the Navigator project appears to involve construction of a pipeline through south-central Minnesota, as well as a segment that runs parallel to a large portion of the southwest corner of the state.³ Limited

¹ If the rules do not require assigning EQB as the Responsible Government Unit (RGU) under a mandatory category, nonetheless the most practical arrangement may be for EQB to become the RGU and rely on other expert state agencies as cooperating agencies, and to oversee the efforts of fully consulting with the Lower and Upper Sioux Communities.

² Available at <https://www.revisor.mn.gov/rules/4410.1100/#rule.4410.1100.2>.

³ Maps for this project appear to be non-final and different maps provided by the company show slightly different routes within Minnesota and near the Minnesota border. Such uncertainty is cause for more scrutiny since the company appears to be open to route alternatives that could have less environmental and social impact overall.

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additional information about this specific project has been made available by the company, but it is subject to PUC approval in the state of Iowa as a hazardous liquid pipeline and may be in Minnesota as well. The company's project timeline indicates it will be applying for necessary permits in late 2021.⁴

B. The proposer of the project.

Navigator CO2 Ventures LLC.

Address: 2626 Cole Avenue, Suite 900, Dallas, TX 75204.

Phone: (214) 880-6030.

"Contact us" website: <https://www.navigatorco2.com/contact>.

C. The name, address, and telephone number of the representative of the petitioners.

Peg Furshong, Director of Operations & Programs, Clean Up the River Environment (CURE).

Address: 117 S 1st Street, Montevideo, MN 56265.

Phone: (320) 269-2984.

D. A brief description of the potential environmental effects which may result from the project.

Pipeline construction and operation has the potential for significant environmental effects. This is undisputable as the EQB has established mandatory EAW and Environmental Impact Statement (EIS) categories for hazardous liquid pipelines and other pipelines.⁵ The pipelines covered by Minnesota's regulatory authority,⁶ and therefore the MEPA mandatory categories, is broad enough to cover the Project proposed by Navigator. Minnesota's Public Utilities Commission (PUC) regulates pipeline routing with authority broad enough to cover all hazardous liquid and high-pressure gas pipelines⁷ – the PUC regulations are a demonstration that we know these are major construction projects that may significantly impact humans and the environment. Indeed, the most recent oil pipeline that the PUC oversaw the routing of was

⁴ Heartland Greenway, Project Status, <https://heartlandgreenway.com/project-status/>.

⁵ Minn. R. 4410.4300, subp. 7, *available at* <https://www.revisor.mn.gov/rules/4410.4300/#rule.4410.4300.7> (designating the EQB as the Responsible Government Unit (RGU) for EAW preparation for various forms of pipelines); Minn. R. 4410.4400, subp. 24, <https://www.revisor.mn.gov/rules/4410.4400/#rule.4410.4400.24> ("For routing of a pipeline subject to the full route selection procedures under Minnesota Statutes, section [216G.02](#), the Public Utilities Commission is the RGU" and must prepare an EIS).

⁶ Minn. Stat. 216G.02, Subd. 1, *available at* <https://www.revisor.mn.gov/statutes/cite/216G.02#stat.216G.02.1> (defining the hazardous liquid and high-pressure pipelines subject to the EIS mandatory category cited *id.*).

⁷ Minn. Stat. 216G.02, Subd. 3, *available at* <https://www.revisor.mn.gov/statutes/cite/216G.02#stat.216G.02.3> ("The Public Utilities Commission shall adopt rules governing the routing of pipelines.").

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subject to a mandatory EIS.⁸ It would be inconsistent with both MEPA regulations and recent agency practice to allow the Project to proceed without rigorous environmental review.⁹

Minnesota's overall regulatory scheme further demonstrates that the Legislature clearly intended for pipeline routing to be subject to regulatory review and oversight, including MEPA. The Pipeline Routing Act (Minn. Stat. 216G) gives the state environmental review and permitting responsibility for routing of pipe with a nominal diameter of six inches or more that is designed to transport hazardous liquids.¹⁰ The apparent legislative intent, similar to Power Plant Siting Act,¹¹ was to have state-level oversight of this infrastructure to minimize the human and environmental impact, and avoid unnecessary human and environmental impacts that may result of a patchwork of local politics creating uncoordinated routing. Further proof that MEPA review is required, the Legislature explicitly showed especial concern for the protection and restoration of agricultural land crossed by a pipeline.¹² The legislature obviously sought to protect agricultural land and livelihoods from destructive pipelines and poor construction practices regardless of what hazardous substance was transported therein.

It is a spurious reading of Minnesota law to think that this Project can avoid MEPA review because it is transporting a new kind of hazardous liquid. While liquid CO₂ is widely considered to be hazardous and this project is being regulated in other states as a hazardous liquid pipeline,¹³ the PUC's implementing rules for the Minnesota Pipeline Routing Act narrow the universe of hazardous liquids down to just petroleum, petroleum products, and anhydrous ammonia.¹⁴ However, this is clear legal error on the part of the PUC since the relevant statute on pipeline

⁸ See Minnesota Department of Commerce, Final Environmental Impact Statement Text – Revised, Dec. 9, 2019, <https://mn.gov/eera/web/file-list/13765/>.

⁹ While it may be debatable that an oil spill and a CO₂ leak would have the same environmental impacts, it is beyond question that the standard for an EAW (“may have the *potential* for significant environmental impacts”) is met here, where a large hazardous liquid pipeline project would cut across a large section of southern Minnesota farmland.

¹⁰ Minn. Stat. 216G.02, Subd. 1.

¹¹ Minn. Stat. 216E.02, Subd. 1, *available at* <https://www.revisor.mn.gov/statutes/cite/216E/full#stat.216E.02.1> (“The legislature hereby declares it to be the policy of the state to locate large electric power facilities in an orderly manner compatible with environmental preservation and the efficient use of resources. In accordance with this policy the commission shall choose locations that minimize adverse human and environmental impact while insuring continuing electric power system reliability and integrity and insuring that electric energy needs are met and fulfilled in an orderly and timely fashion.”).

¹² See Minn. Stat. 216G.07, Subd. 5, <https://www.revisor.mn.gov/statutes/cite/216G.07#stat.216G.07.5>.

¹³ Iowa Utilities Board, Public Informational Meetings on the Proposed Summit Carbon Pipeline, Oct. 15, 2021, <https://iub.iowa.gov/press-release/2021-10-15/public-informational-meetings-proposed-summit-carbon-pipeline> (“The proposed project is classified as a hazardous liquid pipeline, which is governed by Iowa Code chapter 479B and the IUB’s administrative rules at 199 Iowa Administrative Code chapter 13.”).

¹⁴ Minn. R. 7852.0100, subp. 18, <https://www.revisor.mn.gov/rules/7852.0100/#rule.7852.0100.18>.

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routing is not similarly restricted to an arbitrary subset of potential substances to-be-transported.¹⁵ Regardless of what the PUC regulations may define as a hazardous liquid pipeline, the Project “may have the potential for significant environmental impacts” and is therefore covered by MEPA regardless of the PUC’s regulations.¹⁶

Based on environmental review of similar projects in other jurisdictions and environmental review for pipeline construction projects in Minnesota, as well as statements by Navigator about the Project, the potential for significant environmental effects exists in the following areas:

- **Land use and management:** Establishment of a pipeline corridor can result in permanent conversion of land cover and can impede future land use that is incompatible with safe operation of the pipeline. The Legislature highlighted this very issue when it comes to agricultural lands.
- **Natural environment:** Pipeline construction involves significant land disturbance with potentially significant impacts on: soil health, water quality,¹⁷ wildlife mobility/access, wetland conversion, water quantity (water appropriations), and groundwater – particularly near surface aquifers.¹⁸ Long-term, the presence of the pipeline has the potential to cause groundwater impacts (preferential flow along the pipe), safety impacts (leaks and explosions), habitat fragmentation, and the eventual cost and perpetual risk of abandonment in situ.
- **Lands of historical, archaeological, and cultural significance:** Pipeline construction involves extensive ground disturbance with the potential to result in degradation or destruction of archaeological and culturally significant resources.¹⁹ The long-term presence of a pipeline in the ground has the potential to significantly impact cultural uses and the experience and connection to culturally important resources and values.

¹⁵ Minn. Stat. 216G.02, Subd. 1.

¹⁶ Indeed, the EAW mandatory categories in Minn. R. 4410.4300, subp. 7, name the EQB as the RGU, making the PUC’s participation irrelevant. Additionally, regardless of the mandatory categories’ exact wording, the Project’s construction and operational footprint is sufficiently large and destructive to require an EAW.

¹⁷ The example of Line 3’s pollution at water crossing and wetlands should be cause for higher standards of environmental review for any future pipelines proposed in the state. Rilyn Eischens, *Enbridge Line 3 drilling fluid spills: What we know so far*, Minnesota Reformer, Aug. 16, 2021, <https://minnesotareformer.com/2021/08/16/enbridge-line-3-drilling-fluid-spills-what-we-know-so-far/>.

¹⁸ The recent agency experience of Enbridge’s Line 3 doing significant and lasting damage to a major Minnesota aquifer is but one example of the dangers posed by a poorly-planned or executed pipeline project. See Minnesota Department of Natural Resources, Ann Pierce letter to Leo Golden, Enbridge Energy, LLP, Sept. 16, 2021, <https://files.dnr.state.mn.us/features/line3/administrative-penalty-order-enbridge-energy-9-16-21.pdf> (including an Administrative Penalty Order for Enbridge’s breach of an artesian aquifer causing uncontrolled groundwater appropriations).

¹⁹ For example, construction of the Dakota Access Pipeline was widely reported to have destroyed sites of archeological and sacred significance to the Standing Rock Sioux. See Chip Colwell, *Why Sacred Sites Were Destroyed for the Dakota Access Pipeline*, The Conversation, Nov. 26, 2016, <https://www.ecowatch.com/sacred-sites-standing-rock-2103468697.html>.

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- **Economies within the route:** Pipeline corridor establishment can create permanent changes to the local economy associated with changes tax base, land use and property values. Furthermore, a Project that is designed to make industrial fertilizer²⁰ and ethanol production more profitable for customers²¹ would only increase the acreage of field corn,²² and could have a negative impact on acreage that would otherwise be in conservation programs and the species and water that relies on such conservation programs.
- **Human health impacts:** Ruptured CO₂ pipelines can poison large numbers of nearby people.²³ “CO₂ is odorless, colorless and heavier than air” but in pressurized and cooled form when the pipeline ruptures it comes out “in a dense, powdery white cloud that sinks to the ground and is cold enough to make steel so brittle it can be smashed with a sledgehammer.”²⁴ When a pipeline ruptured in Satartia, Mississippi, 49 people were hospitalized, and the only reason they immediately knew they were being poisoned was because the pipeline was carrying hydrogen sulfide, which had an odor that alerted people to the danger.²⁵ Conversely, the Project would apparently be carrying pure CO₂, which could sicken people without their even being able to perceive its presence.
- **Cumulative potential effects:** Navigator has stated that it is “in discussions with multiple parties that consume CO₂ who would desire delivery interconnection points to provide a ratable, consistent source for CO₂ acquisition.”²⁶ The most likely and profitable use for is enhanced oil recovery, which is subsidized by the federal government. This use for Navigator’s Project is made even more likely by Navigator’s announcement that it is partnering with Advanced Resources International,²⁷ a company that uses CO₂ to conduct

²⁰ Navigator Approved To Proceed With Development and Construction of Heartland Greenway System in Midwest, PR Newswire, Oct. 14, 2021, <https://www.prnewswire.com/news-releases/navigator-approved-to-proceed-with-development-and-construction-of-heartland-greenway-system-in-midwest-301399943.html> (“Navigator's current and future customers for the system include many rural value-added ag processors from the ethanol and fertilizer industries.”).

²¹ Ethanol refineries are currently sitting idle because of a lack of demand for their products. Jerry Perkins, *Dozens of Ethanol Plants Remain Idle in Early 2021*, Successful Farming, Jan. 14, 2021, <https://www.agriculture.com/news/business/dozens-of-ethanol-plants-idle-production-in-early-2021>.

²² Currently 57 percent of Iowa’s field corn is used to produce ethanol. Iowa Corn, Corn: it’s everything, <https://www.iowacorn.org/media-page/corn-facts>.

²³ Dan Zegart, *The Gassing Of Satartia*, Huffington Post, Aug. 26, 2021, https://www.huffpost.com/entry/gassing-satartia-mississippi-co2-pipeline_n_60ddea9fe4b0ddef8b0ddc8f.

²⁴ *Id.*

²⁵ *Id.*

²⁶ Navigator Approved To Proceed With Development and Construction of Heartland Greenway System in Midwest, PR Newswire, Oct. 14, 2021, <https://www.prnewswire.com/news-releases/navigator-approved-to-proceed-with-development-and-construction-of-heartland-greenway-system-in-midwest-301399943.html>.

²⁷ *Id.*

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enhanced oil recovery.²⁸ The fact that this project may increase access to fossil fuels that are then shipped, processed, and burned, creates the potential for global cumulative effects from this Project and must be adequately studied and mitigated.

- E. Material evidence indicating that, because of the nature or location of the proposed project, there may be potential for significant environmental effects. The material evidence must physically accompany the petition. It is not sufficient to merely provide a reference or citation to where the evidence may be found.**

The nature of this Project, a plan to build a pipeline system of “approximately 1,300 miles across five Midwest states to nearly 20 receipt points,”²⁹ is by itself likely to have the potential for significant environmental impacts. In Wyoming, the Bureau of Land Management prepared an EIS for the Wyoming Pipeline Corridor Initiative, itself billed as a plan to prepare pipeline corridors “for future use of pipelines associated with carbon capture, utilization and storage (CCUS), enhanced oil recovery (EOR) and delivery of associated petroleum products.”³⁰ While the plan was first proposed in 2012 the agency only was able to complete environmental review in early 2021.³¹ Similarly, in this case since there is no statutory deadline for environmental review or permitting,³² it is to be expected that a full environmental review can and should take as much time as necessary to fully vet the potential for significant environmental impacts.

- The BLM’s scoping, DEIS, FEIS, response to comments, and Record of Decision, for that project is available at <https://eplanning.blm.gov/eplanning-ui/project/1502028/570> and the FEIS is attached herein as **Exhibit A**.

Generally speaking, pipelines are heavily impactful on the environment and as a result they require the highest level of environmental review. While it transports a different hazardous liquid, the Line 3 process is illustrative. To comply with state law that project required a full EIS. Additionally, the pipeline’s Routing Permit lists a large number of conditions that regulators deemed necessary to protect the environment and the public – further demonstration that these projects do impact such resources and must be studied in order to be mitigated.

- The Minnesota Department of Commerce’s EIS for the Line 3 pipeline replacement project is available at <https://mn.gov/eera/web/file-list/13765/> and its executive summary document is attached herein as **Exhibit B**.

²⁸ Advanced Resources International, Inc., Consulting: Enhanced Recovery, https://www.adv-res.com/consulting_enhanced_recovery.php

²⁹ Navigator Approved To Proceed With Development and Construction of Heartland Greenway System in Midwest, PR Newswire, Oct. 14, 2021, <https://www.prnewswire.com/news-releases/navigator-approved-to-proceed-with-development-and-construction-of-heartland-greenway-system-in-midwest-301399943.html>.

³⁰ Wyoming Energy Authority, Wyoming Pipeline Corridor Initiative, <https://www.wyoenergy.org/portfolio/projects/wyoming-pipeline-corridor-initiative/>.

³¹ *Id.*

³² At this point Navigator has not applied for a Certificate of Need or Route Permit from the PUC and it is unclear whether they intend to do so even though Minnesota statute appears to require it.

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- The Minnesota PUC's Routing Permit for the Line 3 pipeline replacement project is available at <https://www.edockets.state.mn.us/EFiling/edockets/searchDocuments.do?method=showPoup&documentId={80F0B166-0000-C83B-95D1-DBD35DC260AE}&documentTitle=201810-147316-02> and is attached herein as **Exhibit C**.

It is also beyond question that the Project's location endangers lands that are of particular significance to the Upper and Lower Sioux Communities, as well as Dakota peoples both inside and outside the state of Minnesota. While these lands may not be currently held in trust for the relevant tribes, it is nevertheless their business to oversee the continued preservation of their cultural and archeological sites. The recent and well-documented history of pipelines destroying Indigenous cultural and spiritual sites is by itself a reason to conduct a full environmental review on the Project, as it may have the potential to significantly impact irreplaceable cultural resources.

- The original treaty cessions map for the state of Minnesota is available through the Library of Congress at <https://www.loc.gov/resource/g3701em.gct00002/?sp=33&r=-0.981,-0.052,2.962,1.434,0> and is attached herein as **Exhibit D**.
- The map of Navigator's planned routes is reflected in this map, obviously crossing a large portion of historic Dakota lands:

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Aside from the well-documented potential for poisoning discussed above, CO₂ is commonly used to euthanize animals and is deadly in large concentrations.

- Information on the flow rate of CO₂ commonly used to euthanize laboratory animals is available at <https://www.bu.edu/researchsupport/compliance/animal-care/working-with-animals/euthanasia/carbon-dioxide-euthanasia-for-rats-and-mice/> and is attached herein as **Exhibit E**.

Additionally, the nature of this project is to perpetuate a climate crisis, and this project would likely be harmful to the effort to move the economy toward clean energy and net zero emissions.

- CIEL's report [Confronting the Myth of Carbon-Free Fossil Fuels: Why Carbon Capture is Not a Climate Solution](#) is attached herein as **Exhibit F**.

All of the articles and press releases cited in footnotes above are attached herein as **Exhibit G**.

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The fact that this company has hidden its true intentions and plans is not a reason to give it a MEPA pass.

Hiding behind vague statements such as “Navigator values the rural industries and landscapes that the Heartland Greenway will influence” and the promise of public meetings in the future,³³ Navigator has not provided rural Minnesota residents with any information on the potential impacts of the Project on their environment, lives, and livelihoods. The company’s failure to be forthcoming with the public about the scope and impact of its Project is itself cause for the EQB to give this Project a hard look under MEPA. It is prudent to err on the side of caution in assessing whether there is the potential for significant human and environmental effects, and this project obviously could cause irreversible damage to natural resources and human health. The project proposer’s lack of transparency and communication with the public about its plans makes it difficult to achieve a high level of specificity in identifying potentially significant human and environmental effects for this Project, but nevertheless, the material evidence provided here establishes that projects of this nature do have known environmental risks.³⁴ It is reasonable for EQB to require MEPA review in order to better understand the potentially significant human and environmental effects of this Project.

EQB cannot assign this MEPA analysis to an incompetent RGU.

Furthermore, it is worth noting that in recent discussions of calculating climate change impacts of projects many local governments have revealed that they do not have the capacity to act as an RGU for projects with significant climate change analysis under the cumulative impacts EAW question. Similarly, local governments have no experience conducting environmental review for pipeline projects, which are normally conducted by state agencies. As a result, it is appropriate for EQB to oversee the preparation of MEPA documents, or potentially assign this task out to an experienced agency such as the Department of Commerce. It would be unfair and inappropriate to burden local governments with the responsibility of preparing an EAW in this case.

³³ Navigator Approved To Proceed With Development and Construction of Heartland Greenway System in Midwest, PR Newswire, Oct. 14, 2021, <https://www.prnewswire.com/news-releases/navigator-approved-to-proceed-with-development-and-construction-of-heartland-greenway-system-in-midwest-301399943.html>.

³⁴ While this evidence is not necessarily specific to the exact details of Navigator’s Project, it is indeed enough to show the potential for significant environmental impacts, the trigger for full environmental review under MEPA. As a result, it would be more efficient for EQB to order an EIS rather than starting with an EAW but since the petition process is for an EAW that is how petitioners are obligated to proceed.

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We, the undersigned, assert that Navigator CO₂ Ventures LLC's Project may have the potential for significant environmental impacts and therefore EQB is required to conduct an Environmental Assessment Worksheet before any government entity can approve any action on the Project.

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Heartland Greenway Carbon Pipeline Petition

Time	Name (First)	Name (Last)	Mobile Phone	Address (Address)	Address (City)	Addr	Address
10/31/2021 10:16	Mary	Johannsen	(612) 636-7917	2418 Aldrich Ave No	Minneapolis	MN	55411
10/31/2021 10:26	Juliann	Rule	(320) 363-8760	35002 115th Ave.	Avon	MN	56310
10/31/2021 10:39	Jim	Falk	(320) 875-4341	1170 Highway 9 NE	Murdock	MN	56271
10/31/2021 10:39	Janet	Anderson	(952) 545-6662	3343 Beard Avenue N.	Robbinsdale	MN	55422
10/31/2021 10:54	Mark	Owens	(507) 438-1321	1104 3rd St NW	Austin	MN	55912
10/31/2021 11:25	Verlaine	Halvorsen	(651) 485-1058	3510 The Mall	Minnetonka	MN	55345
10/31/2021 11:32	Glenda	Noble	(952) 442-1890	336 W 5th St	Waconia	MN	55387
10/31/2021 11:57	Margaret	Kuchenreuther	(320) 288-9454	905 W 4th St.	Morris	MN	56267
10/31/2021 11:59	John	Ihle	(218) 979-0254	27451 S. Hwy 34	Barnesville	MN	56514
10/31/2021 12:26	Michael	McMahon	(512) 770-7268	4121 31st Ave S	Minneapolis	MN	55406
10/31/2021 12:27	Doretta	Reisenweber	(218) 349-3491	101 W Kent Rd	Duluth	MN	55812
10/31/2021 13:21	Thomas	Casey	(952) 472-1099	2854 Cambridge Lane	Mound	MN	55364
10/31/2021 14:42	lisa	bergerud	(612) 224-5874	3132 longfellow ave	MINNEAPOLIS	MN	55407
10/31/2021 14:53	Peg	Challgren	(952) 929-9671	7091 135th St W	Apple Valley	MN	55124
10/31/2021 15:42	Dorothy	Anderson	(320) 841-1375	2558 271 Ave	Madison	MN	56256
10/31/2021 16:45	Linda	Olson	(218) 722-9740	117 E. 8th St.	Duluth	MN	55805
10/31/2021 17:48	Lynn C.	Lang	(320) 202-0341	1721 Polaris Ct.	Saint Cloud	MN	56303
10/31/2021 20:23	Karen	Falk	(320) 333-8059	1170 HWY 9 NE	Murdock	MN	56271
10/31/2021 20:32	Jane	Eastes	(612) 590-0066	39251 Sylvanus Trail	Battle Lake	MN	56515
10/31/2021 21:03	Dave	Jungst	(320) 288-3689	1 Willow Lane	Morris	MN	56267
10/31/2021 22:25	Arne	Kildegaard	(320) 589-6214	548 E. 5th St.	Morris	MN	56267
11/1/2021 0:09	brian	wojtalewicz	(320) 760-8416	2095 110th st sw	Appleton	MN	56208
11/1/2021 0:57	marilyn	gockowski	(218) 728-4198	1427 Cliff Ave	Duluth	MN	55811-2722
11/1/2021 7:51	Ann	Miller	(218) 464-3658	2921 E 1st St	Duluth	MN	55812
11/1/2021 9:25	Janine	Wojtalewicz	(320) 808-5983	2095 110th St. SW	Appleton	MN	56208
11/1/2021 10:36	Loretta	Jaus	(507) 254-1234	22891 651 Ave	Gibbon	ME	55335
11/1/2021 10:45	Peter	Kennedy	(906) 869-2192	602 Peck street	Murdock	MN	56271
11/1/2021 11:30	Gail	Linnerson	(612) 331-8711	141 Belvidere St. E	Saint Paul	MN	55107
11/1/2021 11:45	Jennifer	Wahls	(218) 310-9058	PO Box 30064	Winona	MN	55987
11/1/2021 11:48	Michelle	Kaisersatt	(507) 351-6945	44398 Hillside Court	St. Peter	MN	56082
11/1/2021 12:11	Alice	Madden	(206) 372-8471	3343 16th Av S, #3, #3	Minneapolis	MN	55407
11/1/2021 15:25	Terry	VanDerPol	(320) 226-8110	80402 115 th St	Granite Falls	MN	56241
11/1/2021 15:25	Teresa	Peterson	(320) 226-1227	41956 County Hwy 7	Belview	MN	56214

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11/1/2021 15:26	Anne	Borgendale	(320) 226-7292	2268 373rd Ave	Montevideo	MN	56265
11/1/2021 15:33	Audrey	Arner	(320) 226-2873	9060 40th St SW	Montevideo	MN	56265
11/1/2021 16:09	Peg	Furshong	(320) 333-6132	81307 150th St	Sacred Heart	MN	56285
11/1/2021 16:27	Maggie	Schuppert	(917) 767-5278	1543 Edmund Ave.	Saint Paul	MN	55104
11/1/2021 16:44	Steven	Petrich	(320) 293-3576	81307 150th St	Sacred Heart	MN	56285
11/1/2021 16:47	Laura	Youngbird	(701) 640-4895	803 11th St N	Breckenridge	MN	56520
11/1/2021 16:48	Felix	Youngbird	(701) 640-4898	803 11th St N	Breckenridge	MN	56520
11/1/2021 16:56	Rhyan	Schicker	(585) 857-2121	721 4th ave	madison	MN	56256
11/1/2021 17:38	Josephine	Hoffman	(701) 261-5263	4127 Boardman St	Minneapolis	MN	55417
11/1/2021 18:23	Andrew	Hodny	(320) 321-9165	2268 373rd Ave	Montevideo	MN	56265
11/1/2021 18:37	Amber	Moore	(612) 768-6064	3524 Elliot Ave	Minneapolis	MN	55407
11/2/2021 9:43	Duane	Ninneman	(320) 808-3101	P O Box 154 37490 US Hwy	Ortonville	MN	56278
11/2/2021 11:08	Dani	Prados	(917) 775-2917	726 Prentice St	Granite Falls	MN	56241
11/2/2021 11:11	Malena	Handeen	(320) 314-2474	5075 100th Avenue NW	Milan	MN	56262
11/2/2021 11:28	Robert	Larsen	(507) 430-0276	611 Fallwood Rd0	Redwood Falls	MN	56283
11/2/2021 11:37	Shane	Loeffler	(218) 220-8656	2160 Carter Ave	Apt 1	MN	55108
11/2/2021 12:03	Christy	Dolph	(612) 868-1565	3323 Benjamin St NE	Minneapolis	MN	55418
11/2/2021 13:14	Maureen	Laughlin	(320) 760-0089	37490 US Hwy 75, PO Box 154	Ortonville	MN	56278
11/2/2021 13:26	Beth	OKeefe	(507) 430-4368	38775 Reservation highway 1	Morton	MN	56270
11/2/2021 14:33	Athena	Kildegaard	(320) 349-0661	548 E. 5th St.	Morris	MN	56267
11/2/2021 15:24	ERIK	HATLESTAD	(320) 905-1543	104 3RD AVE SE	New London	MN	56273
11/2/2021 16:15	Ann	Borman	(651) 336-7212	403 East 3rd Street	Morris	MN	56267
11/2/2021 17:09	PHILIP	HERNICK	(651) 341-1778	1046 Briar Creek Rd	Eagan	MN	55123
11/2/2021 17:11	Jane	O'Laughlin	(612) 825-3756	4629 Colfax Ave S	MINNEAPOLIS	MN	55419
11/2/2021 17:14	John	Shaw	(319) 331-4348	35646 Graystone Rd	Battle Lake	MN	56515
11/2/2021 17:20	Len	Jennings	(651) 644-4510	2222 Hillside Ave	St. Paul	MN	55108
11/2/2021 17:39	Kathryn	Wolford	(612) 850-8040	1226 West 53rd Street	Minneapolis	MN	55419
11/2/2021 18:01	David	Minge	(651) 493-9488	1142 Portland Ave	St. Paul	MN	55104
11/2/2021 18:07	Ramona Kitto	Statelty	(651) 263-0942	8074 Stratford Circle S	Shakopee	MN	55379
11/2/2021 18:15	Andrew	Rosenau	(320) 248-6825	89670 County Rd 37	Maynard	MN	56260
11/2/2021 18:28	Glen	Jacobsen	(320) 365-4089	74461 410th St.	Bird Island	MN	55310
11/2/2021 18:56	Joleen	Rosenau	(320) 226-5359	89670 County Road 37	Maynard	MN	56260
11/2/2021 19:01	Dale	Rosenau	(320) 226-5654	11343 US Hwy 212	Sacred Heart	MN	56285
11/2/2021 19:06	Stephanie	Rosenau	(320) 564-4691	11343 US Hwy 212	Sacred Heart	MN	56285

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11/2/2021 19:50	Hans	Langseth	(507) 360-4642	721 4th Ave	Madison	MN	56256
11/2/2021 20:12	Jennifer	Schally	(651) 439-6756	1104 Creekside Circle	Stillwater	MN	55082
11/2/2021 21:11	Lila	Salls	(320) 815-4358	38742 State Hwy 7	Ortonville	MN	56278
11/2/2021 21:16	Sarah	Wolbert	(612) 741-6074	1633 Lafond Ave	Saint Paul	MN	55104
11/2/2021 21:21	John	Salls	(320) 349-0324	38842 State Hwy 7	Ortonville	MN	56278
11/3/2021 10:20	Sean	Carroll	(763) 297-1931	2947 Ulysses Street NE	Minneapolis	MN	55418
11/3/2021 10:31	Ted	Suss	(507) 828-3377	19650 270th street	Lucan	MN	56255
11/3/2021 10:42	Matt	Norton	(612) 669-1630	143 Orlin Ave SE	Minneapolis	MN	55414
11/3/2021 10:49	philip	Solseng	(612) 723-9539	16330 Carver Highlands Dr.	Carver, Minnesota	MN	55315
11/3/2021 11:03	Hudson	Kingston	(218) 248-1490	13675 Deer Road	Ely	MN	55731
11/3/2021 11:04	Sharon	Pazi Zea	(320) 226-7204	1600 8th Ave	Granite falls	MN	56241
11/3/2021 11:06	sharon	day	(651) 325-8077	14931 315th st	center city	MN	55012
11/3/2021 11:29	Amy	Waananen	(763) 486-0154	1249 Blair Avenue	Saint Paul	MN	55104
11/3/2021 11:46	Molly	Malone	(612) 234-1199	112 Tepeeotah Road	Tracy	MN	56175
11/3/2021 11:49	Lloyd	Hansen	(612) 210-5713	3001 Washburn Place	Bloomington	MN	55431
11/3/2021 11:54	Jordan	Almen	(320) 424-1758	110 West Grant Street	Apt 6K	MN	55403
11/3/2021 11:57	Kay	Slama	(320) 905-6051	5380 132nd Ave NE	Spicer	MN	56288
11/3/2021 12:06	Robert	Spomer	(320) 212-9714	5390 132nd Ave NE	Spicer	MN	56288
11/3/2021 12:10	Cindy	Rice	(612) 423-3312	531 Horseshoe Drive	Willmar	MN	56201
11/3/2021 12:18	Cindy	Rice	(612) 423-3312	531 Horseshoe Drive	Willmar	MN	56201
11/3/2021 12:41	Hannah	Epp	(320) 250-8255	3402 22nd St	Apt 306	MN	56301
11/3/2021 12:59	Noreen	Hautala	(218) 213-0792	POB 38	Grand Rapids	MN	55744
11/3/2021 13:26	Colleen	Borgendale	(612) 723-2486	5100 14th Ave S	Minneapolis	MN	55417
11/3/2021 13:27	Clovis	Curl	(415) 902-6384	3151 Aldrich Ave S #3	Minneapolis	MN	55408
11/3/2021 13:30	Nicholas	Duros	(715) 571-4809	5100 14th Ave S	Minneapolis	MN	55417
11/3/2021 13:40	Rita	Chamblin	(806) 939-6618	9025 Kinn Dr NE	Bemidji	MN	56601
11/3/2021 14:40	Carole	Fernholz	(320) 226-2315	2745 Highway 40	Madison	MN	56256
11/3/2021 16:56	Randall	Streier	(218) 245-3319	23348 county road 53	Bigfork	MN	56628
11/3/2021 16:58	Charlee	Gorham	(203) 654-0633	3241 Park Avenue Apt 2	Minneapolis	MN	55407
11/3/2021 17:03	Wesley	Hromatko	(507) 760-0876	752 121st Street	Lake Wilson	MN	56151
11/3/2021 17:55	Lyn	Wanek	(320) 219-1699	P.O. Box 302	Carlos	MN	56319
11/3/2021 17:58	Barb	Miller	(920) 203-3412	310 4th Ave South	St Cloud	MN	56301
11/3/2021 18:09	Cameran	Bailey	(760) 712-8859	2015 NE Taylor St	Minneapolis	MN	55418
11/3/2021 18:10	Kari	Dorry	(320) 305-4167	39753 Apple Valley Road	Ortonville	MN	56278

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11/3/2021 18:58	Steve	Molenaar	(320) 295-0063	5560 22nd Street SW	Willmar	MN	56201
11/3/2021 20:23	Vickie	Cyr	(320) 905-4747	Po box 19456	Minneapolis	MN	55419
11/3/2021 22:39	Darwin	Dyce	(507) 476-2042	1764 330th St.	Ghent	MN	56239
11/4/2021 0:29	Stacy	Miller	(651) 303-2580	990 Kensington Trail Apt 102	EAGAN	MN	55123
11/4/2021 7:29	Misty	Butler	(320) 226-8488	127 E St	MARSHALL	MN	56258
11/4/2021 10:02	Sandy	Spieler	(612) 402-7846	3227 23rd av so	Minneapolis	MN	55407
11/4/2021 10:44	James	Van Der Pol	(320) 905-0318	4075 110th Avenue NE	Kerkhoven	MN	56252
11/4/2021 10:44	Laura	Thielke	(320) 808-4720	62793 270th St	Chokio	MN	56221
11/4/2021 12:09	Kirstin	Lindstrom	(801) 529-5828	1320 120th St. SW	Milan	MN	56262
11/4/2021 15:32	Michael	Salvevold	(218) 770-2062	25564 Dahl Rd	Detroit Lakes	MN	56501-9435
11/4/2021 15:32	Stacy	Salvevold	(218) 770-2062	25564 DAHL RD	DETROIT LAKES	MN	56501
11/4/2021 17:33	Lucy	Tokheim	(320) 769-2142	2057 361st Ave	Dawson	MN	56232
11/4/2021 20:22	Sam	Benson	(218) 329-3833	1901 Stevens Ave, Apt. 206	Minneapolis	MN	55403
11/5/2021 9:54	Megan	Falvey	(612) 267-3007	10 Como Ave	Saint Paul	MN	55103
11/5/2021 10:47	Vicki	Poier	(320) 269-7869	1075 1st Ave. N	Montevideo	MN	56265
11/5/2021 10:48	Hal	Moore	(218) 727-5319	502 Madison Ave	Duluth	MN	55811
11/5/2021 11:20	Jill	crafton	(952) 944-5583	10351 Decatur Ave S	Bloomington	MN	55438
11/5/2021 11:40	Tom	Thompson	(218) 848-8031	1370 White Lake Drive	Duluth	MN	55803
11/5/2021 12:05	Doretta	Reisenweber	(218) 349-3491	101 West Kent Road	Duluth	MN	55812
11/5/2021 12:59	Matthew	Sheets	(320) 766-4395	105 East 3rd Street	Morris	MN	56267
11/5/2021 13:11	Sara	Wolff	(651) 491-1229	710 Linwood Ave	Saint Paul	MN	55105
11/5/2021 14:28	Bobby	King	(507) 450-7258	3101 \$3rd Ave S	Minneapolis	MN	55406
11/5/2021 14:52	Janet	Keough	(218) 343-5007	2787 NORTHWOODS LN	DULUTH	MN	55803-9703
11/5/2021 14:52	Peter	Buesseler	(218) 760-3952	196 Swedmark DR SW	Bemidji	MN	56601
11/5/2021 14:52	Judy	Chucker	(952) 210-8604	2260 Ridge Dr Apt 32	St. Louis Park	MN	55416
11/5/2021 15:08	Julian	Sellers	(651) 698-5737	1875 Juliet Avenue	Saint Paul	MN	55105
11/5/2021 15:53	Ann	Cohen	(612) 209-7209	1831 Ashland Avenue	Saint Paul	MN	55104
11/5/2021 15:55	Brian	Buxton	(952) 956-0261	9317 Hyland Creek Rd	Bloomington	MN	55437
11/5/2021 16:39	Evan	Mulholland	(603) 219-5850	5104 Vincent Ave. S.	Minneapolis	MN	55410
11/5/2021 17:13	Brett	Benson	(651) 368-1226	1383 OSCEOLA AVE	Saint Paul	MN	55105
11/5/2021 17:51	Johannah	Frisby	(612) 281-3744	12 River Terrace Court, Apt #203	Minneapolis	MN	55414
11/5/2021 18:01	Lois	Norrgard	(612) 998-6484	10368 Columbus circle	Bloomington	MN	55420
11/5/2021 19:13	Jean	Ross	(612) 824-2080	3624 Bryant Ave. S.	Minneapolis	MN	55409
11/5/2021 19:48	Alice	West	(218) 213-4546	315 1st Ave East	Grand Marais	MN	55604-3109

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11/5/2021 23:04	Tim	Anderson	(218) 269-4797	2195 Olson Rd	Carlton	MN	55718
11/6/2021 10:36	jim	hawkins	(612) 655-5321	1425 W 28th St Apt 209	Minneapolis, 55408	MN	55408
11/6/2021 10:43	Wallace	Wadd	(651) 738-9038	2530 Queensport Rd	Woodbury	MN	55125-3527
11/6/2021 11:41	Robert	Lamp	(651) 395-1992	7595 Currell Blvd Unit 251466	Woodbury	MN	55125
11/6/2021 13:39	Teresa	Clarke	(906) 221-4302	602 Peck St	Murdock	MN	56271
11/6/2021 17:08	maggie	smith	(612) 297-4588	210 s 1st St.	Montevideo	MN	56265
11/6/2021 20:49	DyAnn	Andybur	(218) 341-7804	4119 mcculloch street	duluth	MN	55804
11/7/2021 6:57	Brett	Smith	(612) 702-6513	5300 Irving Ave South	Minneapolis	MN	55419
11/7/2021 8:26	Buff	Grace	(651) 323-3167	722 Everett Street South	Stillwater	MN	55082
11/7/2021 8:46	Brian-Paco	Bertrand	(507) 401-0535	PO Box 72	Marshall	MN	56258
11/7/2021 18:02	Ryan	Meehan	(218) 275-0234	PO Box 35	Granite Falls	MN	56241
11/7/2021 20:02	Allison	Broesder	(507) 476-5914	608 W Redwood St	Marshall	MN	56258
11/7/2021 22:22	Kathleen	Felt	(507) 304-2416	702 Cornelia Street	North Mankato	MN	56003
11/8/2021 10:00	Steve	Schultz	(612) 812-1647	3150 Excelsior Blvd, #410	Minneapolis	MN	55416
11/8/2021 10:45	Judy	Grant	(651) 646-6355	3807 Garfield Ave. S., Apt 5	Minneapolis	MN	55409-1135
11/8/2021 10:51	Jeanne	Cirisan	(805) 610-9742	18746 Clear View Ter	Minnetonka	MN	55345
11/8/2021 11:45	Terri	Burnor	(651) 324-2343	1657 Watson AVE.	St. Paul	MN	55116
11/8/2021 11:52	Bill	Schnell	(218) 398-3079	701 SW 11th Ave	Grand Rapids	MN	55744
11/9/2021 11:33	Lisa	Fitzpatrick	(218) 726-8093	5229 Peabody St.	Duluth	MN	55804