

# Minnesota Department of Natural Resources

500 Lafayette Road • St. Paul, MN • 55155-40



August 21, 2014

Burl Haar, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul MN 55101-2147

Re: Sandpiper Pipeline Project – System Alternatives  
PUC Docket Numbers: PL-6668/CN-13-473 (Certificate of Need)  
PL-6668/PPL-13-474 (Route Permit)

The Minnesota Department of Natural Resources (DNR) previously provided input regarding the Pipeline Routing Permit Application and scoping for the Comparative Environmental Assessment (CEA) for the Sandpiper Pipeline Project. During the comment periods ending April 4, 2014 and May 30, 2014, the DNR requested further analysis of a number of routes and route segments in the relative vicinity of the Preferred Route proposed by the North Dakota Pipeline Company. The DNR also attended the August 7, 2014 PUC Agenda Meeting regarding routing alternatives. We appreciate the Public Utilities Commission (PUC) determination that routes identified in DNR letters will be further analyzed in the CEA. The following comments are submitted regarding the topic of “system alternatives,” generally defined as routes that do not share one or both of the Preferred Route Clearbrook, Minnesota and Superior, Wisconsin terminals.


Though the DNR review did not focus on system alternatives, our previous letter stated that the DNR “supports the efforts of state and federal resource agencies to encourage analysis of topics including various routes in the event of a leak, leak risk analysis, and reducing impacts to wetlands, lakes and streams.” The Preferred Route for the Sandpiper Project is proposed in a region of the state that contains a concentration of important lakes for fisheries, trout streams, sensitive aquifers, public conservation lands, and mineral and forestry resources. The DNR is also concerned about “greenfield” routing along areas without previous disturbance.

Considering the current demand for transportation of oil from North Dakota and the Enbridge Line 3 project proposed to follow the Sandpiper Pipeline route, the Sandpiper route could become a new corridor for multiple pipelines. Therefore, the DNR encourages the PUC to strongly consider analysis of one or more system alternatives having fewer environmental and natural resource impacts than the Preferred Route in addition to route alternatives approved for inclusion in the CEA. Environmental review of one or more system alternatives should be equivalent to the analysis conducted for route alternatives. If a system alternative is included in the scope of an environmental review document, the DNR encourages interagency coordination so that the DNR can provide data regarding a new corridor prior to environmental review document publication.

Thank you for the opportunity to provide these additional comments regarding system alternatives.



Sincerely,

A handwritten signature in black ink that reads "Jamie Schrenzel". The signature is fluid and cursive, with the first name "Jamie" being larger and more prominent than the last name "Schrenzel".

Jamie Schrenzel  
Principal Planner  
Environmental Review Unit  
(651) 259-5115

cc: Larry Hartman, Minnesota Department of Commerce  
Patrice Jensen, Minnesota Pollution Control Agency  
Sara Ploetz, Enbridge