



Minnesota Coalition of Lake Associations  
**Resolution**  
On  
Enbridge, Inc.  
Sandpiper / Line 3 Utility Corridor  
Need and “Preferred” Route

Regarding PUC Dockets:

# CN-13-473: Sandpiper Certificate of Need

# PPL-13-474: Sandpiper Route Permit

#PL-9/CN-14-916: Line 3 Certificate of Need

#PL-9/PPL-15-137: Line 3 Route Permit

**Whereas**, the proposed routing of oil pipelines imperil the unspoiled Mississippi Headwaters, lakes and streams in Minnesota, which constitute an irreplaceable heritage for the future generations;

**Whereas**, the wetlands, aquifers, and soils of the affected region are integral to the health of the overall water heritage;

**Whereas**, the wild rice beds within the affected region are both sacred to indigenous peoples and a key source of nourishment for all;

**Whereas**, utility corridors by their nature create the potential for habitat fragmentation;

**Whereas**, the economic value of clean water is well established, regarding the tourism industry and livability standards of all people in the region;

**Whereas**, the preferred routing of the Sandpiper and Line 3 endanger these delicate and remote regions;

**Whereas**, Enbridge, like all pipeline operations, has a record of spills and uncorrected leakage that put this water heritage at risk;

**Whereas**, the record of oil pipeline spillage far exceeds that of both rail and truck transport methods combined;

**Whereas**, the recovery of spilled oil from pipelines has been shown to be less than 50%;

**Whereas**, the types of oil products proposed for transport through these water-rich regions are particularly dangerous due to their volatility, and density causing them to sink into the water;

**Whereas**, many of the additives to facilitate the flow of oil have remained secret, posing an unknown and further risk to clean-up efforts;

**Whereas**, safety testing and safety preparations to protect such a remote region cannot be adequate to the difficulty of the task;

**Whereas**, the safety factors and pipe specifications have been dominated by industry, with minimal independent analysis;

**Whereas**, there has not been adequate requirements for site specific analysis of potential soil subsidence that could affect the performance and safety of the proposed pipelines;

**Whereas**, the proposed co-location of an additional pipeline, Line 3 replacement, in the Sandpiper preferred corridor has not been adequately analyzed for its cumulative environmental impact, nor for further development if this route is established;

**Whereas**, the abandonment of Line 3 in place along its present corridor will require a thorough cleaning, gating and continuing maintenance of the pipe that by its continuing presence constitutes further risk to that region;

**Whereas**, the abandonment of pipes with significant leakage present bored and uninterrupted underneath water bodies and wetlands poses the additional risk of unintended drainage and material transport affecting the natural ecosystem;

**Whereas**, the abandonment of Line 3 in place along its present corridor prevents the analysis and cleanup of potential contaminants present underneath the pipeline due to the long history of anomalous leakage;

**Whereas**, the abandonment of Line 3 in place along its present corridor eliminates the possibility of reusing an established route;

**Whereas**, without further study, an established electric transmission corridor is not necessarily appropriate for the co-location of oil pipelines due to the potential for dangerous conditions during a cleanup operation;

**Whereas**, there is no direct availability for the transported oil products in the State of Minnesota for either refinement operations or for consumption, but only an indirect oil-market supply effect;

**Whereas**, unlike regulations in Canada, there are no Minnesota State Guidelines that address the special conditions inherent to the region regarding the mitigation and restoration of an abandoned oil pipeline;

**Whereas**, there is no guaranteed bonding or escrow for cleanup of future spills or eventual retirement, mitigation and restoration of Enbridge oil pipelines, but only meager and voluntary grants program from Enbridge for emergency response training that expects public agencies to bear additional costs;

**Whereas**, the development and use of tar-sands oil bitumen contributes a particular threat to global climate change;

**Whereas**, jobs necessitated by the construction of an oil pipeline through Minnesota are not dependant on the particular route chosen;

**Whereas**, the additional cost of either replacing Line 3 in its current route, or removing it altogether with mitigation and restoration should not be a concern for Minnesota regulators;

**Whereas**, the Enbridge Company has engaged in deceptive public messaging, inadequate environmental review, undisclosed information about the oil itself, lack of transparency about future plans, and exploitation of inadequate regulation; and

**Whereas**, the Minnesota Department of Natural Resources and the Pollution Control Agency have each expressed serious reservations as to the preferred routing of the Sandpiper and Line 3 replacement and the adequacy of its environmental impact;

***HEREBY RESOLVED***, that the Board of Directors of the Minnesota Coalition of Lake Associations:

- 1) urges the Public Utilities Commission to compel a full Environmental Impact Statement for the Enbridge proposal to establish a new oil pipeline corridor with multiple co-locations, rather than rely on the simpler and inadequate Comparative Environmental Analysis that is the minimum required;
- 2) urges the Public Utilities Commission to take greater caution in assessing the need and determining the routing of the proposed Enbridge pipelines;
- 3) urges the Public Utilities Commission to consider a longer comment period for the present proposals, and a moratorium on similar pipeline proposals in the future until the present proposals are fully analyzed for their environmental impacts;
- 4) urges the Public Utilities Commission to seriously consider the true need for these pipelines through Minnesota, and the alternative routings that have been proposed by others;
- 5) urges both the State and Federal governments to create greater regulation of the oil transport industry within their jurisdictions to

ensure that the environmental and economic impacts of such projects are full vetted in all their aspects; and

6) urges the MN Dept of Commerce and Public Utilities Commission to withdraw from the approval process and restore it to Minnesota's Environmental Quality Board, Pollution Control Agency and the Dept of Natural Resources.

**Submitted** by the Board of Directors of the Minnesota Coalition of Lake Association (MN COLA), this day, September 29, 2015.



Thomas K. Nelson,  
President, MN COLA

**Motion** by Jerry Lerom, Association of Cass County Lakes

**Second** by Syd Corrigan, Beltrami County Lakes and Rivers Association

**Passed** by unanimous decision of the Board of Directors, MN COLA

**Attest:**

Joseph Shneider, Secretary, MN COLA