



AMERICAN PETROLEUM INSTITUTE

Minnesota & Wisconsin

Erin T. Roth
Executive Director

February 19, 2019

U.S. Army Corps of Engineers, St. Paul District

RE: Docket No. 2014-01071-TJH

These comments are submitted on behalf of the members of the American Petroleum Institute (API) Minnesota and Wisconsin Petroleum Council. The MN/WI Council is the state chapter of API. API is the only national trade association representing all facets of the natural gas and oil industry, that supports 10.3 million U.S. jobs, and nearly 8 percent of the U.S. economy. API's more than 600 members include integrated companies, as well as, exploration and production, refining, marketing, pipeline, marine businesses, and service and supply firms.

The API MN/WI Council has consistently supported the Enbridge Line 3 Replacement Project and urges the St. Paul District to act favorably on Enbridge's permit request after evaluating the proposed pipeline replacement project's compliance with Section 10/404 for work in waters of the U.S. associated with the applicant's designated route, in addition to its review of Enbridge's Section 408 request to alter a federal project at the proposed crossing of the Lost River in Red Lake County, Minnesota.

For four years, Enbridge has responsibly and actively participated in the regulatory and community evaluation of this project. The company has participated in 65 public meetings, including 15 public meetings on tribal reservations where agreements were reached with two directly affected Native American Tribes, submitted vital project information to the project docket, attended public events, and engaged in active public education efforts. Through this diligent and robust evaluation based on regulator and community feedback, Enbridge has carefully designed the pipeline's relocation to minimize societal and environmental impacts. Notably, they have conducted extensive wetland and waterbody field surveys, worked closely with key Tribes on archaeological surveys, designed the project to avoid wetlands and waterbodies, and have addressed short-and-long term mitigation through a robust Environmental Protection Plan (EPP).

Enbridge's Line 3 pipeline system is an essential component of the regional network for shipments of crude oil. API is supportive of this project as it will create an economic boost for northern Minnesota counties, provide some 8,600 family-sustaining jobs, and ultimately-by replacing aging infrastructure-ensure protection of water resources and the environment. The API MN/WI Council joins more than 90 elected officials, local governments, and thousands of Minnesotans who support the Line 3 Replacement Project.

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The span of innovative technologies at work in the oil and natural gas industry today helps to protect the environment and advance safety. While no pipeline replacement project is routine, Enbridge has spent years preparing for this project and has access to technologies that will help ensure its success. The API MN/WI Council stands behind Enbridge as they strive for the safe and efficient delivery of crude oil.

Thank you for your consideration.

A handwritten signature in black ink that reads "Erin T. Roth". The signature is written in a cursive style with a prominent flourish at the end of the last name.

Mr. Erin T. Roth