

Corridor EIS Archives

From: corridoreiswebmaster@anl.gov
Sent: Monday, July 10, 2006 6:21 PM
To: Corridor EIS Archives
Subject: Preliminary Draft Corridor Map Comment M0125

Attachments: Comments_of_Enbridge_Energy_Co._Inc._to_preliminary_energy_corridor_map_M0125.doc



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Thank you for your comment, Larry Springer.

The comment tracking number that has been assigned to your comment is M0125. Once the comment response document has been published, please refer to the comment tracking number to locate the response.

Comment Date: July 10, 2006 06:20:32PM CDT

Preliminary Draft Corridor Map Comment: M0125

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Privacy Preference: Don't withhold name or address from public record
Attachment: C:\CLAUDIA WORK FOLDER\WESTERN CORRIDORS\Comments of Enbridge Energy Co. Inc.
to preliminary energy corridor map.doc

Questions about submitting comments over the Web? Contact us at:
corridoreiswebmaster@anl.gov or call the Preliminary Draft Corridor Map Webmaster at
(630)252-6182.

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July 10, 2006

Office of Electricity Delivery and Energy Reliability
Room 8H-033
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Re: Comments on the Preliminary
Energy Corridor Map

Dear Sir or Madam:

Enbridge Energy Company, Inc., hereinafter referred to as "Enbridge," hereby submits this letter to the Department of the Interior in response to the request for comments on the Preliminary Energy Corridor Map, as more fully explained below. Enbridge appreciates the opportunity to participate in this important endeavor and is pleased to offer the following comments.

About Enbridge

Enbridge Energy Company, Inc. is the Operator (through various Enbridge affiliated companies in the U.S.) of more than 14,000 miles of natural gas and liquid petroleum pipelines in the United States. Our *Liquids Transportation Segment* includes the Enbridge Lakehead and North Dakota Systems, Cushing Terminal, Ozark Pipeline, Spearhead Pipeline and Toledo Pipeline, along with some other assets. Our *Natural Gas Business Segment* includes three interstate natural gas onshore pipelines, a number of natural gas offshore pipelines and gas gathering and processing systems in Texas and the Mid-Continent area of the United States.

For more than a decade, Enbridge has worked diligently to expand its existing systems and oversee the construction of new pipeline systems, resulting in nearly 2,000 miles of new pipeline infrastructure in the United States. Today the majority of our U.S. systems are located predominately in the Midwest; however, Enbridge has – and continues to evaluate the potential

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for – new natural gas or crude oil pipeline systems in the initial energy corridor study area. Enbridge believes that it has a valid and substantial interest in the development of the Programmatic Environmental Impact Statement ("PEIS"), especially as this endeavor to designate energy corridors moves beyond the initial western states to include other regions of the United States, as mandated under the Energy Policy Act.

Comments on Potential Energy Corridors on Federal Lands

Overall, Enbridge supports the ongoing efforts of the Secretaries of Energy, Interior, Agriculture and Defense (jointly referred to as the "Secretaries") to designate potential energy corridors for oil, gas and hydrogen pipelines, as well as for electricity transmission and distribution facilities, on federal lands in 11 contiguous western states, as set forth under Section 368 of the Energy Policy Act of 2005. Enbridge also supports the endeavors of the Secretaries, as directed under this 2005 legislation, to incorporate the designated corridors into the relevant agency land-use plans and resource management plans or equivalent plans and to perform any environmental review that may be required to complete the designation of these corridors. Equally, Enbridge believes that the preparation of the West-wide Energy Corridor PEIS, pursuant to the National Environmental Policy Act, is needed and a necessary step in identifying environmental impacts associated with designating energy corridors on federal lands.

Enbridge also appreciates the Secretaries' initiatives over the last year in holding outreach stakeholder meetings to gather public comments to help frame-up necessary alternatives where needed, and develop the best solutions possible for these energy corridors.

While Enbridge understands the principals for creating energy corridors, Enbridge respectfully urges the Secretaries to consider the following concerns and issues, which may serve as potential barriers to the successful use of designated energy corridors as intended under current federal legislation.

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1. The draft PEIS should incorporate a process to consider market dynamics in designating energy corridors

The proposed PEIS should assess corridors for any long-term supply/demand study – as well as a thorough understanding of existing infrastructure and capacity constraints. The real issue that needs to be considered is getting energy to markets when and where it is needed. Enbridge respectfully encourages the four cooperating federal agencies developing the PEIS to take a hard look at present and future market dynamics, in order to better anticipate where energy transmission needs will be and then plan the corridors accordingly, with flexibility to add, eliminate or modify these routes as needed to be responsive to present and future market demands.

In addition, supply sources change as new production is found. New routes will be needed to bring these new energy sources to market. The draft PEIS will need to allow pre-designated corridors to be adapted to accommodate these new energy sources.

2. The draft PEIS should not prohibit project development outside corridor if need arises

The proposed PEIS should not prohibit the development of projects outside of the designated energy corridor if the need arises. For example, natural gas sourced from the Rocky Mountains may not economically compete with natural gas sourced from the Gulf Coast or Canada if transmission pipelines cannot be constructed along the most direct and economical routes. Likewise, crude oil sourced from Canada and the Montana/North Dakota regions likely could not be economically transported by pipeline directly to U.S. West Coast refineries unless additional corridors could be designated that more directly align the production fields with those markets.

3. The draft PEIS should clearly define energy corridor width and establish processes to alter, adjust or modify such width as needed

The proposed PEIS should assess corridors with traditional multiple-use principles. Corridors should be wide enough to permit the installation of multiple systems in the same corridor without such activities interfering with any of the existing facilities or any new facilities to come in the near future. Corridors will need to be clearly defined and suitable to accommodate one or more rights-of-way, which are similar, identical or compatible.

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Enbridge encourages the Secretaries to develop processes that would create flexibility in determining corridor width for constructing linear facilities or when extra temporary work space is needed outside these pre-designated areas.

4. The draft PEIS should establish procedures to streamline and expedite the permitting process when using designated corridors to cross federal lands

The proposed PEIS needs to ensure interagency coordination as part of the application process to reduce disparate processes and procedures among permitting agencies. If energy corridors are designated, companies should see a streamlined process for siting facilities under National Environmental Policy Act. Specifically, companies should be allowed to complete an environmental assessment versus the full environmental impact statement in designated corridors. For corridors that remain unutilized for several years, the affected agency should be required to complete a follow-up environmental assessment with specified mitigation measures for future projects in those corridors.

5. The draft PEIS should establish procedures to protect against encroachment in designated energy corridors

The corridors should be protected from encroachment or activities that are incompatible with siting of energy transmission facilities. Under various federal laws and regulations, United States Department of Transportation (DOT), Pipeline and Hazardous Materials Safety Administration requires that liquid transmission pipelines be patrolled and inspected at least every three weeks but not less than twenty-six (26) times per year to watch for abnormal conditions or dangerous activities, e.g., unauthorized excavation, along the routes of the lines. Typically, pipeline operators conduct these important patrols with low-flying aircraft. Consequently, it is imperative that these pipeline corridors must be kept clear of any visible obstructions that would prevent companies from complying with these federal rules. Thus Enbridge encourages the Secretaries to develop of procedures in the PEIS that would prevent any such encroachments within pre-designated energy corridors.

6. The draft PEIS should establish procedures to ensure corridor connectivity between public and private lands

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The proposed PEIS should include a look at private lands that may be needed to fill the gap between designated energy corridors and the process that should be followed with landowners. What this means is that with the use of pre-designated energy corridors on federal land, adjoining private land(s) may become the “funnel” for directing power and pipeline transmission projects into such federal corridor. Enbridge believes that substantial consideration needs to be given as to whether these landowners are being unduly burdened simply because they are geographically adjacent to a federal energy corridor.

Additionally, the draft PEIS needs to take into consideration that tribal, state and local governments should be consulted periodically on the reasonableness of existing and proposed energy corridors, since these lands are not federally managed. These entities must become firm stakeholders in the process, because the permitting for a major linear transmission project needs to align with those governments for state, local and private urban development as well. Thus, Enbridge believes that close coordination between Federal agencies and other governmental entities is even more important to ensure corridor connectivity, especially when future separate permitting processes involve one or more states. This too will help facilitate in the development of vital energy products and expedite permitting processes.

7. The draft PEIS should establish procedures to ensure year-round access to facilities located on designated energy corridor

Since corridors will be designated on federal lands, companies need assurance of year-round access to facilities for maintenance and operations. For example, where distances across corridors are great, pipelines may need to locate compressors or pump stations within the corridors. These facilities would require regular access for maintenance and operation. As stated above, federal pipeline safety rules require that transmission pipeline rights-of-way be patrolled at least 26 times per year. While these patrols typically can be accomplished by observing the right-of-way from low-flying aircraft, any restrictions against such over-flights – such as might be imposed for wildlife protection – could place the pipeline in violation of federal regulations where either physical or other constraints would not allow onsite inspection of the right-of-way.

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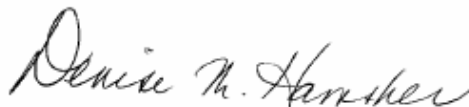
Conclusion

As the nation's economy continues to expand and our population continues to grow, so does our need for energy. Thus, Enbridge believes it is extremely important that the draft PEIS establish clearly defined new and existing energy corridors for power and pipeline projects. This will result in expedited environmental impact assessments and permitting processes, ensuring that critical energy infrastructure is built to meet the present and future energy requirements of this nation in a cost-effective and timely manner. Additionally, the draft PEIS corridor designation process must take into account public safety and system-wide reliability as its primary consideration in identifying corridors, while also creating opportunity to optimize cost-effective delivery of energy in a competitive manner. As mentioned in the *Federal Register*, the PEIS must be based on a set of criteria and strategies that incorporate environmental concerns, project long-term supply and demands, while also addressing network efficiencies, landscape features, and availability of new technology and its associated cost.

Enbridge appreciates the opportunity to participate in this public forum by submitting these comments to help frame the best solution possible for designating energy corridors on federal lands in the western states. Enbridge is willing to discuss any of the comments presented herein and is available upon request to answer any questions or concerns. Please feel free to contact Mr. Larry Springer at 713.821.2253 or the undersigned at 713.821.2089.

Respectfully submitted

ENBRIDGE ENERGY COMPANY, INC.

A handwritten signature in cursive script that reads "Denise M. Hamsher".

Denise Hamsher

Director of Public, Government and Public Affairs