STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GAYLORD FIELD OFFICE

RICK SNYDER
GOVERNOR

C. HEIDI GRETHER
DIRECTOR

September 13, 2017

Mr. Justin Hoffman
Supervisor, Special Projects
Enbridge Pipelines (Lakehead), LLC
26 East Superior Street, Suite 309
Duluth, Minnesota 55802

Dear Mr. Hoffman:

SUBJECT: Information Request
Submission Number: 2RD-DFDK-Y35G
County: Emmet and Mackinac
MiWaters Site Name: 24-Line 5 Enbridge Straits Anchors
Project Name: 2017 Line 5 Anchor Installation Project

The Michigan Department of Environmental Quality (MDEQ), Water Resources Division (WRD), has received and reviewed your Joint Permit Application (JPA) materials and supplemental information for the installation of 22 anchors on Line 5 in the Straits of Mackinac. The WRD has also considered extensive public comments received on the application, as well as information provided during consultations with federally-recognized Indian Tribes in Michigan. In addition, the MDEQ received information verbally from Enbridge Pipelines (Lakehead), LLC (Enbridge) on August 30, 2017, and in a letter dated September 8, 2017, indicating that the external coating of the pipelines had been damaged at certain locations, exposing bare metal in some instances, apparently as a result of past pipeline anchor installation work.

In deciding whether, and under what conditions, to issue the permit for the activities proposed in your application, the WRD must consider the requirements of applicable law, including Rule 15 of Part 325, Great Lakes Submerged Lands, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, which provides:

> "In each application for a permit..., existing and potential adverse environmental effects shall be determined. Approval shall not be granted unless the department has determined both of the following:
>
> (a) That the adverse effects to the environment, public trust, and riparian interests of adjacent owners are minimal and will be mitigated to the extent possible.
>
> (b) That there is no feasible and prudent alternative to the applicant's proposed activity which is consistent with the reasonable requirements of the public health, safety and welfare."

The WRD requests that Enbridge provide the following additional information needed to complete its review to make a decision on the permit application.

1. Submit documentation of the methods previously used to install all the pipeline anchors that are already in place, including details of project execution, issues encountered during anchor installation, any procedures used by Enbridge to detect problems,

including damage to the pipeline and pipeline coating during anchor installation, and actions taken to remedy and prevent the re-occurrence of such issues.

2. Submit a detailed plan for the installation of the additional anchors proposed in the application that includes the following:

   (a) Details of the procedures that Enbridge and its contractor(s) will use to assure that the proposed work will protect and maintain the integrity of the pipeline, including the pipeline coating during anchor installation. This should specifically address how those procedures will be changed from the past installation methods described in response to item 1, above.

   (b) Details of the procedures that will be used to detect, respond to, and remedy any damage that occurs to the pipeline, including pipeline coating, during the anchor installation process.

   (c) Details of whether and how the pipeline will be operated during the anchor installation process.

   (d) Details of how the condition of the pipeline, including the pipeline coating, will be documented before and after each anchor is installed.

   (e) Details of a spill response and contingency plan that will be in place before anchor installation begins, as well as the Enbridge environmental protection plan referenced in the permit application.

3. Submit the following information further explaining the selection and design of the project activity proposed in the application:

   (a) Explain the statement in the permit application that "the pipelines may exceed easement span distances between visual inspections." Specifically, provide a detailed summary of the information (e.g., lakebed studies, current data, model outputs, etc.) on which Enbridge bases its proposal to install 22 additional anchors.

   (b) Explain the reason for decreasing the span distances at the specified anchor locations on the west pipeline designated in the permit application as W-11a through W-11e, W-36B through W-42B, and W-49 through W-70A (see enclosed map).

   (c) Explain why Enbridge proposes to use helical support structures at the 22 proposed locations and whether and how Enbridge considered any other alternatives methods or techniques for supporting the pipeline at those locations.

   (d) Explain the proposed depth of the screw anchors and the geologic evaluation used for determining the depth at each anchor location.

   (e) Explain how Enbridge will prevent or minimize any potential adverse environmental effects of the proposed activity on the environment, including, but not limited to, biota and water quality.

(f) Explain and document how Enbridge has considered alternatives to avoid or minimize potential adverse effects of the proposed activity. Include factors such as, but not limited to, project design, and alternative construction methods.

Please submit a written response within 10 days from the date of this letter. The response should include confirmation that all the requested information will be submitted within 30 days from the date of this letter. Additional information and/or filing fees may be required upon further review of your application. Should we not receive the requested information from you within 30 days from the date of this letter, we will consider your application as withdrawn and will close your application. Fees are not refundable on applications once a decision has been made or if an action has been taken, such as closing an application due to no or incomplete response to a correction request letter, posting a public notice, or conducting a site visit. A new application may be submitted, but fees are not transferable.

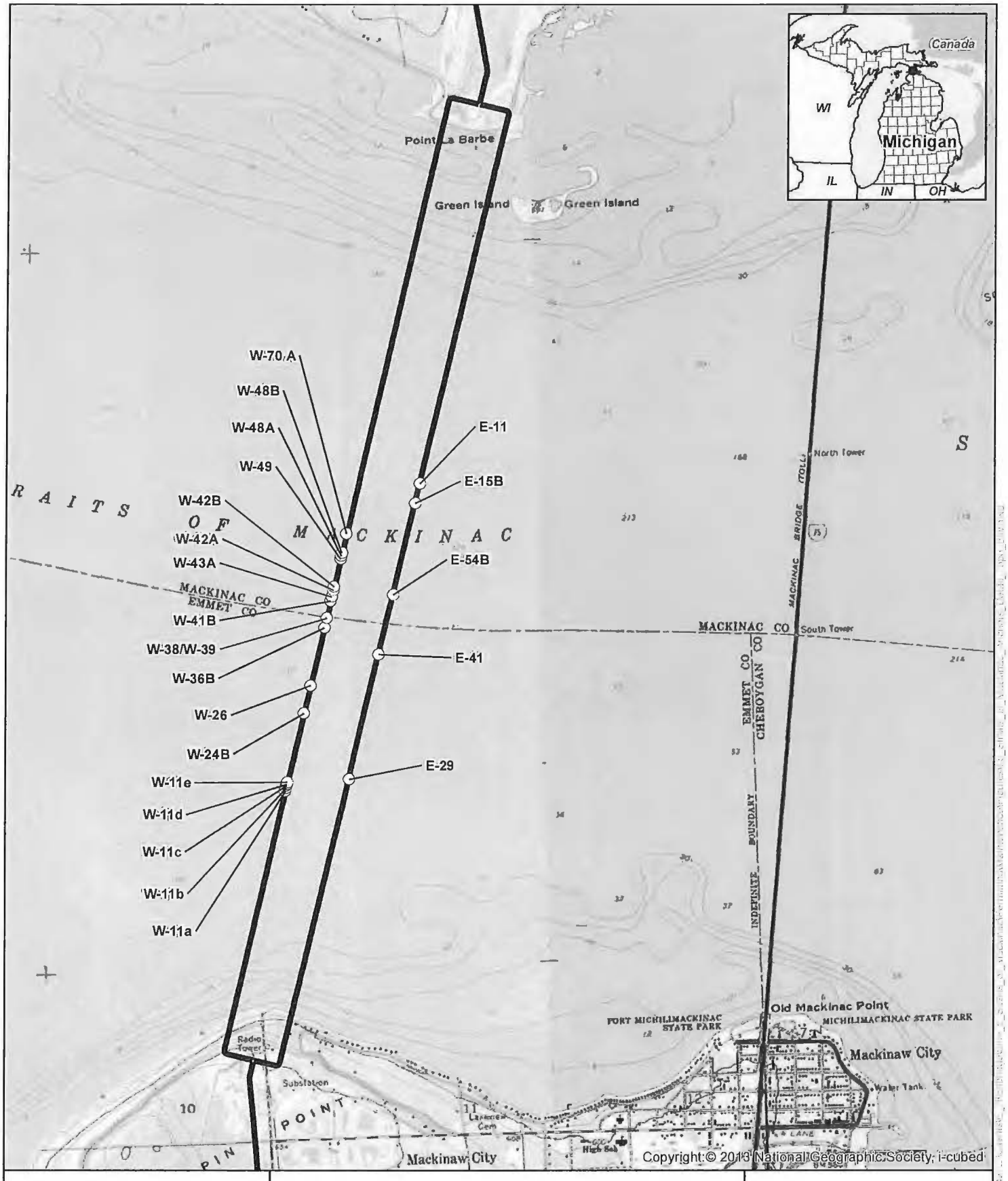
Send the requested information to me via email at haasj1@michigan.gov; or via mail to MDEQ, WRD, Gaylord Field Office, 2100 West M-32, Gaylord, Michigan 49735-9282. Please include your submission number, 2RD-DFDK-Y35G, in your response. The status of your application can be tracked online at https://miwaters.deq.state.mi.us/miwaters/.

If you have any questions regarding this letter or the JPA, please contact me at the above email address; or via phone at 989-330-9252.

Sincerely,

Joseph Haas
District Supervisor
Water Resources Division

Enclosure
cc: Mr. Shane Yokom, Enbridge
Mr. Robert Reichel, DAG
Ms. C. Heidi Grether, Director, MDEQ
Ms. Teresa Seidel, MDEQ
Ms. Kim Fish, MDEQ
Mr. Scott Rasmusson, MDEQ
Mr. Matthew Goddard, MDEQ



0 0.25 0.5 Miles

1 inch = 0.5 miles

N W E S

ENBRIDGE

For Environmental Review Purposes Only

Figure 2b

Line 5 Straits of Mackinac

Enbridge Pipelines (Lakehead) L.L.C.

2017 Proposed Anchor Locations

○ 2017 Proposed Anchor Locations

Line 5