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May 18, 2017

VIA EMAIL

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Re: ***United States v. Enbridge Energy, Limited Partnership, et al.*****, Civ. No. 1:16-cv-00914, Proposed Consent Decree – Line 5 Biota Investigation Work Plan (Revision 2)**

Dear Ms. Kirby-Miles, Ms. Whelan, Ms. Riley, and Ms. Rose:

The Enbridge Defendants ("Enbridge") named in the above-captioned proposed Consent Decree hereby provide a copy of revision 2 of the Line 5 Biota Investigation Work Plan ("Work Plan"). The Work Plan is being submitted in accordance with Subparagraph 69.b of the proposed Consent Decree.

In accordance with Paragraph 155 of the Decree, enclosed are both an unredacted copy and a redacted public copy marked as "Redacted Submittal – Public Copy." Enbridge has identified certain information in the Work Plan that constitutes Critical Energy Infrastructure Information ("CEII") that should not be publicly-released by the Federal government. The redacted information includes pipeline location information that is being voluntarily submitted to the Federal government in expectation of protection from disclosure as provided by the provisions of the Critical Infrastructure Information Act of 2002. In addition, the redacted

information includes other confidential information protected by the Freedom of Information Act, Exemption Nos. 4 and 6.

Please let us know if you have any questions.

Sincerely,



William T. Hassler
David H. Coburn
Attorneys for Enbridge Defendants

cc: Matt Moore, U.S. Environmental Protection Agency
Steven Willey, U.S. Department of Justice
Joe Warren, U.S. Department of Justice
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