



Joe McGaver
Manager Environment
Projects
Environment Projects (US)

Cell 218-390-9254
Joe.McGaver@enbridge.com

Enbridge
11 East Superior Street
Suite 125
Duluth, MN 55802

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Kerryann Weaver
Wetlands Section Supervisor
Watersheds and Wetlands Branch, Water Division
U.S. EPA Region 5

**Re: EPA File WW-16J
USACE Regulatory File No 2020-00260-WMS
Enbridge Line 5 Wisconsin Segment Relocation Project
Supplemental Responses to Enbridge's Cumulative Impacts Analysis**

Dear Kerryann:

Thank you and the U.S. Environmental Protection Agency's ("EPA") continued coordination on Enbridge's proposed Line 5 Wisconsin Segment Relocation Project ("Project"). This letter provides additional information related to EPA's March 16, 2022, "May Affect" letter to the U.S. Army Corps of Engineers. This additional information pertains to an assessment of the Project's potential cumulative impacts to water resources in the Project area and supplements previous Project materials submitted to the EPA, USACE and the Wisconsin Department of Natural Resources as part of responses to the respective agency information requests and/or comments. The additional information supplements Enbridge's responses submitted to the EPA on October 11, 2023, specifically EPA Comment #20 regarding Project cumulative impacts associated in potential future operations and maintenance activities.

If you have questions about the information presented in the attached materials, please contact me at (218) 390-9254.

Sincerely,

Joe McGaver
Technical Manager Environment
Enbridge Energy, Limited Partnership

cc: with enclosures: Melisa Blankenship, U.S. Environmental Protection Agency
Bill Sande, U.S. Army Corps of Engineers
Adam Mednick, Wisconsin Department of Natural Resources
Amy Minser, Wisconsin Department of Natural Resources

Enclosures:

- Enbridge Cumulative Impacts Analysis Supplement

Cumulative Impacts Analysis

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20. Included in the cumulative impact analysis should be the anticipated impact from the continuous disturbance of wetlands and waterbodies from construction and from planned, preventative, and emergency maintenance. The cumulative impacts analysis should include information about modifications to hydrology and degradation of water quality during and following construction and the associated consequences.

Enbridge previously responded to the construction aspects of Question #20 (see responses submitted on October 11, 2023, and December 9, 2023). However, the previous response did not address disturbance from the “planned, preventative, and emergency maintenance” portion of Question #20. The response below expands the previous responses to include additional details regarding the maintenance portion of the question.

Enbridge’s operations and maintenance activities along a pipeline frequently do not result in ground disturbance and/or temporary resource disturbance. Examples of non-intrusive activities include but are not limited to valve inspection and maintenance, monitoring of cathodic protection systems, running in-line inspection tools as part of the Integrity Management Program (IMP), monitoring waterbody crossings after flood events, and completing aerial inspections.

Ground disturbance from maintenance activities could occur when the in-line inspection tools, run as part of the IMP, identify an anomaly in the pipeline that requires further investigation. When this occurs, crews travel to the location of the anomaly, excavate the pipeline, complete the assessment, and implement repairs as required. The maintenance activity is planned, the temporary impacts to resources are identified, and the necessary permits are obtained to complete the maintenance activity as planned. As a result, each maintenance activity is conducted under its own permit process, separate from the original pipeline permitting process. Therefore, temporary resource impacts associated with the site-specific maintenance activity are evaluated and permitted by the respective permitting authorities based on associated resource disturbance.

Enbridge completed an analysis of its existing pipelines which were constructed using similar materials (i.e., fusion bonded epoxy coated pipe with a cathodic protection system) to the proposed Line 5 Wisconsin Segment Relocation Project (WSRP or Project). The analysis reviewed pipelines maintenance activities completed between 2010 to 2023 on five representative pipelines in the United States which totaled approximately 1,900 miles of overall pipeline length. The data set includes maintenance investigations for the respective pipelines following replacement; therefore, not all pipelines reviewed have data for the full 13 years.

Based on the analysis completed, the number of maintenance investigations completed averaged approximately 0.015 maintenance investigation conducted per mile of pipeline averaged per year over the analysis period. WSRP is approximately 41 miles long. Applying the averaged maintenance investigations conducted per mile of pipeline per average year to WSRP would predict that there would be an average of 0.62 maintenance investigations on WSRP during the first year, a total of 6.20 maintenance investigations completed on the line in ten years, and a total of 12.4 maintenance investigations completed on the line in a 20-year period.

The potential for each individual maintenance investigation to impact a wetland or waterbody is dependent on the maintenance investigation location. Maintenance investigations are completed by using existing public and/or private access roads to the right-of-way and then traveling down the right-of-way to the anomaly investigation location. The maintenance activity location may be accessed and investigated in areas which are located completely in upland areas without impacts to wetlands and waterbodies. Conversely, wetlands and waterbodies may be crossed to access the location. In such a case, construction mats would be used to cross wetlands and temporary bridges would be used to cross waterbodies, similar to the proposed activities for construction of WSRP. It is also possible that the anomaly investigation could occur in a wetland and/or waterbody, however, the percentage of a pipeline route that crosses wetlands and waterbodies is typically a small subset of the total land crossed by the pipeline; thereby reducing the likelihood that an anomaly investigation would occur in a wetland/waterbody.

A typical anomaly maintenance investigation requires excavating an approximately 40-foot-long segment of pipeline. The top of the excavation is typically approximately 20 feet wide, with the excavation angled to allow construction personnel safe access into the excavation to investigate the anomaly. The Environmental Protection Plan (EPP) is followed for the maintenance activities, including the installation and maintenance of erosion and

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sediment control devices, use of dewatering structures as required, and completion of site restoration. Additionally, Environmental Inspectors (EIs) visit the sites where wetlands and waterbodies are present. The EIs work with the maintenance crews to assess site conditions, identify sensitive resource area boundaries, implement Best Management Practices in accordance with the EPP and respective permit conditions to protect resources at or near the investigation site, and to review the site-specific permit conditions to verify understanding of applicable permit conditions and/or site restrictions. When maintenance activities and associated access routes are completely within upland areas, the Craft (utility) Inspectors implement the EPP requirements. Craft (utility) Inspectors must complete Enbridge training on implementation of the EPP prior to being responsible for the tasks.

While the number and location of future maintenance activities cannot be determined at this time, the average low number of estimated maintenance activities, the low probability of the maintenance activity occurring in wetlands or waterbodies, the relatively limited area of ground disturbance associated with each site investigation, and implementation of the requirements as outlined in the EPP and respective permits results in cumulative impacts associated with maintenance activities being low.