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Enbridge Energy Company, Inc. Enbridge (U.S.), Inc. Minneapolis Office 7701 France Avenue South Suite 600 Edina, MN 55435

April 8, 2016

 Honorable Bill Schuette Attorney General State of Michigan
525 W. Ottawa Street
P.O. Box 30212
Lansing, MI 48909

Honorable William Moritz

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Honorable Keith Creagh Interim Director Michigan Dept. of Environmental Quality Constitution Hall 525 W. Allegan Street P.O. Box 30473 Lansing, MI 48909

> Dept. of Attorney General RECEIVED

> > APR 1 1 2016

NATURAL RESOURCES DIVISION

Interim Director Michigan Dept. of Natural Resources Executive Division 525 W. Allegan Street Lansing, MI 48933

Re: Enbridge Energy, Limited Partnership ("Enbridge") Line 5 Your joint letter date March 11, 2016

Dear Mr. Schuette, Mr. Creagh, and Mr. Moritz:

Enbridge received your above-referenced letter regarding its Line 5 in Michigan. As with previous requests for information about our operations, Enbridge is pleased to cooperate with the State of Michigan to demonstrate that Line 5 is safe to continue operating in its present configuration, supporting Michigan's economy and its citizens with vital supplies of petroleum products to fuel Michigan's quality of life.

As you may be aware from our previous discussions including our face-to-face meeting on August 24, 2015 and our teleconference on October 13, 2015, Enbridge has undertaken significant efforts to ensure that all stakeholders have the data, information and reports they need with respect to its operations in Michigan. In that regard, Enbridge has dedicated a section of our website to posting information about Line 5, its conditions, and its operations (<u>http://www.enbridge.com/Line5</u>). We are continuing to populate that section with data and, as you will see in our responses to the requests you attached in Exhibit A (see detailed responses attached), much of the information you requested is already posted publicly. It is a priority to Enbridge for the public, and you as their representatives, to have a resource to answer questions about Line 5's continuing operations.

With respect to your requests contained in Exhibit B, Mr. Robert Reichel of the Michigan Attorney General's office and my colleague, Mr. Joel Kanvik, have an understanding that, if the State of Michigan desired to have certain documentation from the portal produced, Mr. Reichel would contact Mr. Kanvik to discuss the appropriate classification of a set of documents; I am aware that we received one such request from Mr. Reichel and Enbridge was responsive to that request. It is not clear if you wish to discontinue using this established process. Regardless, please see the attached detailed responses to the requests in Exhibit B.

As we have offered previously, Enbridge is happy to make internal resources including our VP of Integrity, Walter Kresic, our VP of Control Center Operations, Kirk Byrtus, members of their teams or any other relevant parties available to you or your representatives to provide context around the data and technical reports to assist in understanding any information we are providing with this letter and have previously provided or posted on our website. Please let me know when you would like to arrange such a meeting with one or more of our technical experts and I will arrange the discussions or in person meetings.

We hope the enclosed information will provide you with further assurances about Enbridge's operations in the State of Michigan. Enbridge takes very seriously its responsibility to operate its facilities safely to protect the public and the environment, while providing a vital service to the citizens and economy of Michigan. We look forward to continuing our relationship with Michigan and its citizens in the future. Please let us know if this information meets your requirements or if there is any other information that you require.

Sincerely,

ENBRIDGE ENERGY, LIMITED PARTNERSHIP By Enbridge Pipelines (Lakehead) L.L.C. Its General Partner

Bradley F. Shamla Vice President, U.S. Operations

Enclosures

# EXHIBIT A

Please see provided USB drive for all documents referenced in this Exhibit A, except for the ROV video files, which are provided on the included external hard drive.

#### 1. In-line pipeline inspections

a. All reports of , and data collected in, each in-line inspection of Line 5 conducted to date, including, without limitation, those listed in Tables 2 and 3 of Enbridge's Operational Reliability Plan- Line 5 and Line 5 Straits of Mackinac Crossing, accessed at https://www.enbridgepartners.com/~/media/7FDCBAC7A8FE4705A2729F3D1B51B6B3. ashx

**Response:** Please see the documents provided on the enclosed USB drive. The In-Line Inspection (ILI) reports and associated feature lists from the ILIs conducted on the Line 5 Straits of Mackinac pipelines since the past June 2014 Enbridge submission to the Michigan Attorney General are provided on that drive.

b. Any and all assessments, evaluations or reviews of the in-line inspections referenced in 1.a. by Enbridge or by third parties.

**Response:** The assessments conducted on the identified ILI features from #1a are provided the enclosed USB drive. Additionally a high level overview of those ILI results and assessments, as excerpted from the Enbridge.com website are provided as well.

c. All reports of, and data collected in, any excavations or field assessments resulting from in-line inspections, including, without limitation, those referenced at page 8 of Enbridge's June 27, 2014 response.

**Response:** The results of the field examinations that were used to validate the ILI runs described in #1a are provided on the enclosed USB drive. Additionally a previous information request response that was provided to PHMSA describing the results from a dent inspection that was conducted during the 2014 ROV inspection is provided on that drive as well.

- 2. External pipeline inspections with remotely operated vehicles.
  - a. All film, videos, or other documentation of remotely operated vehicle inspections of the Straits Pipelines listed in Table 2 of Enbridge's June 27, 2014 response, except the video of the 2012 inspection already provided at the time of that response, plus those of any subsequent inspections.

**Response:** The videos taken by the ROV and divers during the 2014 Straits of Mackinac underwater inspection and repair program are filed in the provided external hard drive.

b. Any and all assessments, evaluations, or reviews of the external pipeline inspections requested in 2.a. by Enbridge or third parties.

**Response:** The reports received from the contractor following the 2014 ROV program, and the related assessments conducted by Enbridge to determine support locations, are provided on the enclosed USB drive. *It may be observed that following subsequent inspections the longest remaining span has been decreasing, due to Enbridge's increasingly conservative repair criteria.* 

## 3. Pipeline integrity and replacement

a. The current version of Enbridge's procedure PI-69, Procedure for Pipeline Replacement Assessments referenced at page 3 of Enbridge's June 27, 2014 response.

Response: Please see the document provided on the enclosed USB drive.

b. Any and all documents relating to Enbridge's application of procedure PI-69 to Line 5 as described at page 3 of Enbridge's June 27, 2014 response.

**Response**: The evaluation related to this request was conducted for Enbridge internal long range planning purposes. A memo written specifically in response to this information request was generated to describe the results of this evaluation.

c. Any and all other documents describing the procedures and criteria that would be used by Enbridge to determine whether and when to repair or replace any portion of Line 5, and Enbridge's application of those procedures and criteria to Line 5.

Response: None.

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# 4. Pipeline operating pressure

a. Any and all documents supporting Enbridge's statement at page 12 of its June 27, 2014 response that "Enbridge...[has] operated the [Straits Pipelines] over the years at approximately 25% of their Maximum Operating Pressure."

**Response:** This statement requires a clarification. The Straits pipelines actually operate at approximately 25% of its Specified Minimum Yield Strength (SMYS) not Maximum Operating Pressure. The 2011–2016 pressure vs time plots provided on the enclosed USB drive demonstrate that the pipeline Maximum Operating Pressure which corresponds generates a hoop stress of 21% SMYS. The pressure vs. frequency plot shows that the average daily pressures are below half of MOP (300psi) for the majority of the time.

b. Any and all documents relating changes made by Enbridge to allowable operating pressure for the Straits Pipelines.

**Response:** The enclosed USB drive contains a memo written specifically in response to the information requested describing the history of the Maximum Allowable Operating Pressure

changes at the Straits over the past 5 years; a Management of Change document that describes the 2012 removal of pipeline integrity related pressure restrictions; and a transient analysis that was conducted during the 2013 Line 5 Expansion Project.

#### 5. Effects of mussels attached to the Straits Pipelines

a. Any and all documents relating to effects that the attachment of mussels to the Straits Pipelines have on Enbridge's ability to perform external inspections of their condition and measures, if any, taken by Enbridge to overcome those effects.

**Response:** A memo written in response to this information request describing an assessment of the mussel threat on the Straits pipeline is provided on the enclosed USB drive. The accompanying working Excel file used for this assessment is also provided.

b. Any and all documents relating to the effects that the attachment of mussels to the Straits Pipelines and potential secretions from mussels may have on the physical condition and integrity of the Pipelines and measures, if any, taken by Enbridge to monitor or mitigate those effects.

**Response:** The results from a laboratory investigation conducted on mussel samples taken from the 2014 ROV inspection is provided on the enclosed USB drive.

## EXHIBIT B

Please see the enclosed USB drive for all documents requested in Exhibit B to your letter. Please note that Enbridge provided PDF copies of numerous documents marked as CEII that were previously provided via the FTP site on the USB drive, but some of those documents continue to be marked "CEII – not subject to FOIA" because the information contained therein is of sufficient specificity and sensitivity as to qualify for the CEII FOIA exemption provided under federal law. Enbridge is providing electronic copies of those documents, marked as CEII, as a reasonable compromise so that the State can print and use the documents, but they retain their exempt from FOIA status.

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