September 14, 2012

Ms. Michelle DeLong, Project Coordinator
and Acting Unit Chief
Michigan Department of Environmental Quality
Water Resources Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009

Mr. Mark Ducharme
Project Coordinator DEQ
Michigan Department of Environmental Quality
Remediation Division
Kalamazoo District Office
7953 Adobe Road
Kalamazoo, MI 49009

RE: Schedule of Work Tasks Update,
Enbridge Line 6B MP 608 Marshall, MI Pipeline Release

Dear Ms. DeLong and Mr. DuCharme:

Enbridge Energy, Limited Partnership (Enbridge) is notifying the Michigan Department of Environmental Quality (MDEQ) of the following Schedule of Work Tasks Update, Version 4, Quarter 3, 2012 for implementation. The following text outlines the objective of each task, and changes made since the previous Schedule of Work Tasks Update. The previous Schedule of Work submitted to MDEQ on June 15, 2012 and the updated Schedule of Work are attached as Figure 1 and Figure 2, respectively.

- Conceptual Site Model (CSM) Update
  - Provide quarterly updates to the CSM uploading relevant information related to significant information obtained from ongoing investigations and response activities.

- Monthly Project Updates
  - Provide a summary of significant activities completed on the project, within each month.
  - The end date was changed to reflect the required submittal date by the 27th day of each month, 9/27/17.

- Response to Public Concerns
  - Provide and document appropriate response activities to public concerns, unanticipated site discoveries, and requests for information.

- Source Area
  - Remedial Investigation
    - Complete additional field work and reporting activities to complete the delineation of the extent of oil impact pursuant to the requirements of applicable Michigan regulations as per MDEQ approved work plans.
- Additional Field Work activities including assessment and investigation activities took place July 18 through and including August 3, 2012, and was updated accordingly.
- The ‘RI Report Supplement’ has been incorporated with the Kalamazoo River Data Compiling and Presentation. The ‘RI Report Supplement’ Start date changed from 9/4/12 to 1/5/2012 and the End date changed from 9/28/12 to 12/31/2013.
- The ‘Response’ Start date was changed from 10/1/12 to 8/29/12 and the End date was changed from 11/2/12 to 10/31/12.
  - Restoration
    - Complete activities to restore the Source area to a suitable condition pursuant to a MDEQ approved work plan.
    - The ‘Restoration Plan’ Start date was changed from 11/30/11 to 8/29/12 and the End date was changed from 9/4/12 to 9/7/12.
    - The ‘Restoration’ Start date was changed from 11/5/12 to 9/17/12 and the End date was changed from 12/14/12 to 10/31/12.
  - Talmadge Creek
    - ‘Interim Restoration’ and ‘Final Restoration’ were consolidated to ‘Restoration Plan’, ‘Restoration Field Activities’, and ‘Restoration Monitoring’.
      - Complete interim activities to restore the Talmadge Creek to suitable condition to stabilize the area pursuant to a MDEQ approved work plan.
      - Complete final activities to restore the Talmadge Creek to a suitable condition pursuant to a MDEQ approved work plan.
      - ‘Restoration Plan’ from the ‘Interim’ and ‘Final Restoration’ has been consolidated with a Start date of 8/25/11 and an End date of 6/1/12.
      - ‘Restoration Field Activities’ Start and End dates were changed from 6/15/12 to 7/11/12 and from 12/1/12 to 6/28/13, respectively.
      - ‘Restoration Monitoring’ was added to this section from line item 194 of Figure 1 to line item 124 on Figure 2 with the Start date changing from 4/1/13 to 7/1/13 and the End date changing from 12/29/17 to 12/30/16.
  - Kalamazoo River
    - ‘Kalamazoo River’ End date was changed from 9/2/15 to 12/30/15.
    - Sediment Investigation
      - ‘Sediment Investigation’ Start date was changed from 10/1/12 to 12/2/13.
      - ‘Sediment Work Plan’ was changed from a Start date of 10/1/12 to 12/2/13 and the End date changed from 1/11/13 to 3/17/14.
      - ‘MDEQ Review’ was changed from a Start date of 1/4/13 to 3/17/14 and the End date changed from 2/15/13 to 4/28/14.
      - Complete investigation and reporting activities to complete the delineation of the extent of oil impact to satisfy the requirements of applicable Michigan regulations pursuant to a MDEQ approved work plan after the system has been released from United States Environmental Protection Agency jurisdiction to the MDEQ.
Work initiation and completion dates reflect decision to delay initiation until oil recovery tasks have been complete in the river.

- **Floodplain Investigation**
  - ‘Floodplain Investigation’ End date was changed from 3/11/14 to 12/31/14.
  - Complete investigation and reporting activities will be conducted to delineate the extent of oil impact to satisfy the requirements of applicable Michigan regulations pursuant to a MDEQ approved work plan. Additional work plans may be developed and submitted for remedial investigations at specific priority locations.
  - ‘Floodplain Work Plans’ were changed to ‘Kalamazoo Remedial Investigation Work Plans.’
  - ‘2012 Field’ and ‘2013 Field’ were condensed to ‘Field Activities’ with the same Start date of 1/5/2012 and an End date of 12/31/2013.
  - ‘Data Compiling and Presentation’ was added, and encompasses parcel and Mile Post primers creation, presentation, and sign-off processes.
  - ‘2012 Floodplain RI Report’ and ‘2013 Floodplain RI Report’ were changed to ‘Final Floodplain RI Report’ following completion of ‘Field Activities’. The ‘Final Floodplain RI Report’ End date was changed from 3/11/14 to 12/31/14 with a Start date of 1/1/14.

- **Response Actions**
  - Develop and implement appropriate response activities to remediate and/or manage residual oil impact to ensure the safety of human health and the environment pursuant to a MDEQ approved work plan.

- **Restoration**
  - Complete final activities to restore the area impacted by the oil spill and subsequent clean up efforts to suitable conditions pursuant to a MDEQ approved work plan.
  - The ‘2013 Interim (as necessary)’ Start and End dates were changed from 10/30/13 to 4/1/13, and 5/30/14 to 10/31/13, respectively.
  - The ‘2014 Interim (as necessary)’ End date was changed from 10/30/14 to 10/31/14.
  - The ‘Final Restoration (as necessary)’ Start and End dates were changed from 9/23/14 to 11/3/14, and 6/30/15 to 12/30/15, respectively.

- **Risk Assessment**
  - The ‘Risk Assessment’ will be assessed and incorporated into the revised Kalamazoo River Remedial Investigation process.

- **Invasive Species Plan**
  - Develop and implement a work plan to monitor and control invasive species related to spill response and restoration activities.
  - The ‘Monitoring and Control Plan’ End date was changed from 1/13/12 to 6/1/12.
  - The ‘MDEQ Review’ Start and End dates were changed from 2/1/12 to 6/4/12, and from 2/24/12 to 9/7/12, respectively.
  - The ‘MDEQ Permitting’ Start and End dates were changed from 2/27/12 to 11/1/12 and from 5/31/12 to 3/29/13, respectively.
  - ‘Monitoring/Control (as necessary)’ Start and End dates were changed from 4/2/12 to 10/1/12 and from 9/29/17 to 9/28/16, respectively.
• ‘Erosion Control’ was changed to ‘KRBEAS’
  o Develop and implement a work plan to monitor and restore erosion related to spill response and restoration activities.
  o ‘2012 Control’ End date was changed from 5/29/15 to 12/31/12.
  o ‘Erosion Monitoring’ was moved to this section as ‘2012 Monitoring’ with a revised End date from 5/29/15 to 12/28/12.
• ‘Waste Management Plan’ will be dealt with on a case by case basis in accordance with MDEQ regulations.
• Wetland Mitigation
  o Develop and implement a plan to construct wetlands for mitigation purposes in response to areas permitted for the spill response.
  o ‘Plan Prepare and Submit’ End date was changed from 7/31/12 to 4/30/13.
  o ‘MDEQ Review’ Start and End dates were changed from 7/31/12 to 4/30/13 and from 8/31/12 to 7/31/13, respectively.
  o ‘Mitigation Construction and Planting’ Start and End dates were changed from 8/31/12 to 9/2/13 and from 11/30/12 to 12/2/13, respectively.
  o ‘Monitor’ Start and End dates were changed from 12/3/12 to 12/3/13 and from 1/23/18 to 12/29/16, respectively.
• ‘Unpermitted Activities’ has been changed to ‘Unpermitted Regulated Activities’.
  o Identify all permanent activities completed which normally require permits. Develop and submit required permit applications to the MDEQ.
  o ‘Identify Unpermitted Activities’ has been changed to ‘Identify Unpermitted Regulated Activities’. The Start and End dates have been changed from 9/1/11 to 9/3/12 and from 4/30/12 to 12/31/12, respectively.
  o ‘Develop Permit Applications’ Start and End dates were changed from 4/30/12 to 1/10/13 and from 6/18/12 to 2/28/13, respectively.
  o ‘MDEQ Review’ Start and End dates were changed from 6/19/12 to 3/1/13 and from 9/13/12 to 5/28/13, respectively.
• Project Monitoring
  o Conduct routine monitoring as per approved work plans including:
    o ‘Restoration Monitoring Talmadge Creek’ was moved to the Talmadge Creek section as lines 123 to 124.
    o ‘Invasive Species Monitoring’ from line item 200 has been moved to line items 152 to 154.
    o ‘Erosion Monitoring’ from line item 204 has been renamed to ‘KRBEAS’ and moved to line item 155.
    o ‘Potable Water Monitoring’ End date changed from 5/11/12 to 12/31/13.
    o ‘Surface Water Monitoring’ End date changed from 12/31/12 to 12/31/13.
    o ‘Sediment Monitoring’ End date changed from 9/21/18 to 12/31/13.
    o ‘Groundwater Monitoring’ End date changed from 9/22/17 to 12/31/13.
• Project Decommissioning
  o Decommission all response related facilities, structure, areas, etcetera as applicable.
If you should have any questions or comments on the Schedule of Work Update, please feel free to contact Jim Snider or me.

Sincerely,

Enbridge Energy, Limited Partnership

Bob Steede, P.E.
Manager, Environment Operations - U.S.

Attachments:  
Figure 1. Schedule of Work (June 15, 2012)  
Figure 2. Schedule of Work (September 14, 2012)
Figure 1. Schedule of Work (June 15, 2012)
Enbridge Line 6B MP 608 Marshall, MI Pipeline Release
Enbridge Energy, Limited Partnership

Anticipated Project Schedule of Work
Date: Wed 8/22/12
Version: 2.02.12

Task | Progress | Milestone | Summary | External Tasks | External Milestone | Deadline
--- | --- | --- | --- | --- | --- | ---

1. Conceptual Site Model Update
   - Start: Thu 9/15/11
   - Finish: Fri 9/8/17

2. Monthly Project Updates
   - Start: Mon 8/22/11
   - Finish: Thu 9/21/17

3. Response to Public Concerns
   - Start: Mon 8/8/11
   - Finish: Fri 9/22/17

4. Source Area
   - Start: Mon 8/20/12
   - Finish: Fri 9/28/12

5. Remedial Investigation
   - Start: Mon 8/20/12
   - Finish: Fri 9/28/12

6. Additional Field Work
   - Start: Mon 8/20/12
   - Finish: Fri 9/28/12

7. RI Report Supplement
   - Start: Tue 9/4/12
   - Finish: Fri 11/30/12

8. Response (if necessary)
   - Start: Mon 10/1/12
   - Finish: Fri 11/30/12

9. Restoration
   - Start: Wed 11/30/11
   - Finish: Fri 12/14/12

10. Final Restoration Plan
    - Start: Wed 11/30/11
    - Finish: Fri 12/14/12

11. Final Restoration
    - Start: Mon 11/5/12
    - Finish: Fri 12/14/12

12. Talmadge Creek
    - Start: Fri 7/1/11
    - Finish: Sat 9/2/12

13. Remedial Investigation
    - Start: Fri 7/1/11
    - Finish: Mon 12/5/11

14. Investigation Work Plan
    - Start: Fri 7/1/11
    - Finish: Thu 3/15/11

15. Field Work
    - Start: Mon 8/1/11
    - Finish: Mon 12/5/11

16. Response
    - Start: Mon 8/1/11
    - Finish: Mon 12/5/11

17. Response Plan
    - Start: Mon 8/20/11
    - Finish: Thu 3/15/11

18. MDEQ Review & Approval
    - Start: Wed 8/20/11
    - Finish: Thu 3/15/11

19. Permitting
    - Start: Mon 7/18/11
    - Finish: Wed 12/7/11

20. MDEQ Review Permit
    - Start: Fri 9/2/11
    - Finish: Mon 1/23/12

21. Response Action
    - Start: Mon 10/1/12
    - Finish: Fri 11/30/12

22. Restoration
    - Start: Thu 10/1/12
    - Finish: Sat 12/1/12

23. Interim Restoration
    - Start: Thu 10/1/12
    - Finish: Mon 4/30/12

24. Restoration Plan
    - Start: Thu 10/1/12
    - Finish: Tue 1/1/12

25. Restoration Field Activities
    - Start: Tue 10/25/12
    - Finish: Mon 1/16/12

26. Final Restoration
    - Start: Mon 1/16/12
    - Finish: Sat 3/1/12

27. Restoration
    - Start: Mon 1/16/12
    - Finish: Tue 3/1/12

28. Restoration Field Activities
    - Start: Sat 3/1/12
    - Finish: Sat 3/1/12

29. Kalamazoo River
    - Start: Mon 10/1/12
    - Finish: Wed 9/2/15

30. Sediment Investigation
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

31. Sediment Work Plan
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

32. MDEQ review
    - Start: Fri 7/1/12
    - Finish: Wed 12/13/12

33. 2013 Field
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

34. 2013 Sediment RI Report
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

35. 2014 Field
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

36. 2014 Sediment RI Report
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

37. 2015 Field Data Gaps
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

38. Follow-up Sediment RI Addendum
    - Start: Wed 9/2/15
    - Finish: Wed 12/13/12

39. Floodplain Investigation
    - Start: Fri 9/2/15
    - Finish: Wed 12/13/12
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<td>Project Decommissioning</td>
<td>Fri 9/21/18</td>
<td>Thu 1/5/18</td>
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Figure 1. Schedule of Work (June 15, 2012)
Enbridge Line 68 MP 608 Marshall, MI Pipeline Release
Enbridge Energy, Limited Partnership

Anticipated Project Schedule of Work
Date: Wed 8/22/12
Version: 2.01.2012

Page 3 of 3