

March 2, 2022

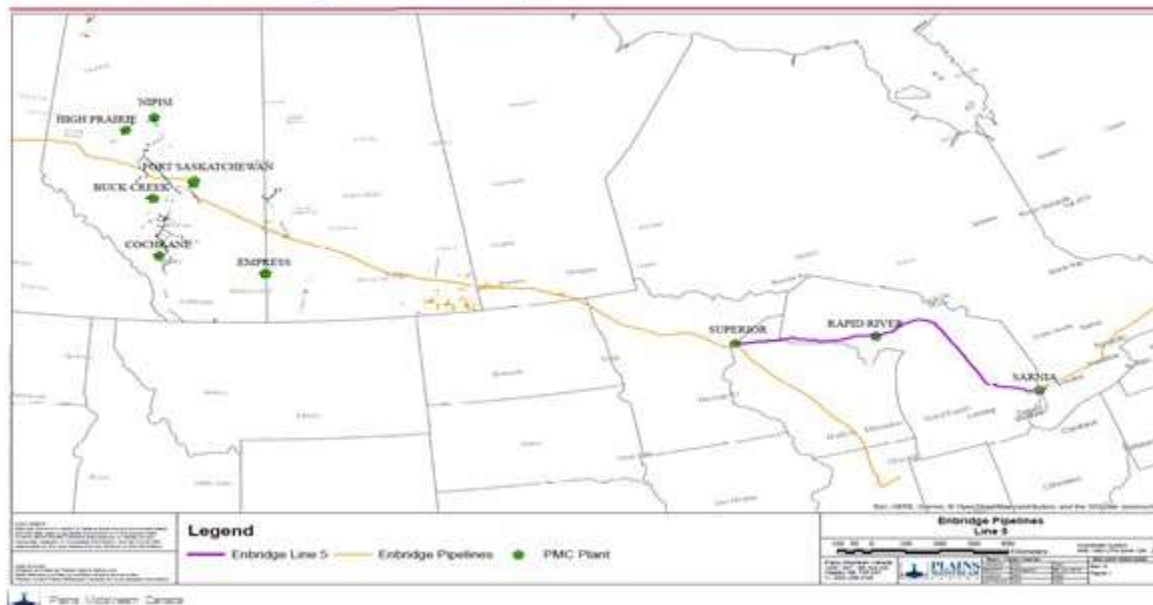
Line 5 EIS Comments, DNR (EA/7)
101 South Webster Street
Madison, WI 53707

I am writing to ask that the Wisconsin Department of Natural Resources (WDNR) promptly process and approve the permit under view needed for the Line 5 Wisconsin Segment Relocation Project to proceed.

Plains Midstream Canada ULC's ("Plains") is well acquainted with the vital role that Line 5 plays in the broader energy transportation network serving Wisconsin, Michigan, and the entire Great Lakes region.

The continued operation of Line 5 is essential to meeting the energy needs of Wisconsin and the surrounding region. As Figure 1 below demonstrates, Line 5 supplies all the feedstock to Plains' Sarnia Fractionation facility in Ontario from production points in Western Canada. Sarnia in turn processes this feedstock into about 800 million USG¹ of propane and 400 million USG of butane per year for supply to surrounding markets.

West to East Pipeline Map



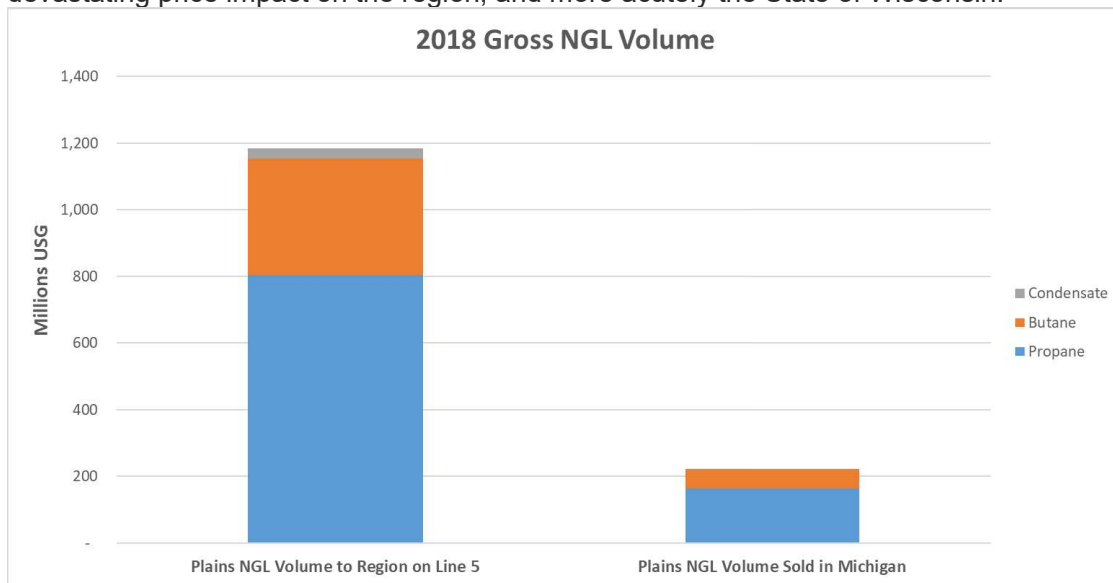
Without the Sarnia Fractionator to separate the feedstock into propane and butane, Plains' Rapid River, MI and Superior, WI facilities would become redundant.

¹ Based on 2018 averages.

Eastern NGL Pipeline Map



Notably, shutting down Line 5 is likely to result in the inevitable shutdown of Plains facilities at Sarnia, Rapid River, and Superior. This would directly impact the employment of approximately 125 Plains' workers in the United States and Canada. The shutdown of these facilities would not only remove ~200 million USG of direct supply to MI, but would also remove indirect supply of ~800 million USG of propane and 400 million USG of butane from the eastern region, which would be expected to have a devastating price impact on the region, and more acutely the State of Wisconsin.





In the medium term, propane shortage induced price impacts would be expected to be much more severe and lasting than those experienced during the polar vortex induced shortages in the winter of 2013/14 that prompted several Midwestern states, including Wisconsin, to declare a state of emergency. Further to the economic impact, supply shortages pose a significant safety risk in winter as individuals may not have supply to heat their homes at any price.

The “Alternatives Analysis” commissioned by the State of Michigan correctly observed the vital service Line 5 provides cannot be feasibly or economically replaced by other pipelines or modes of transportation. The existing pipeline infrastructure through the region is either at capacity or dedicated to other products and could not handle the products or capacity transported by Line 5. The analysis clearly shows that pipelines are the safest, most economic and most reliable method to transport oil and NGLs when compared to other modes of transportation assessed. It has been estimated that over 2000 trucks every day would need to leave Superior and travel east on US-2 to transport the equivalent volume of products carried by Line 5 today.

The report also concluded that Line 5 is in safe operating condition and could continue to operate safely into the foreseeable future. Enbridge’s inspection, monitoring and modernization efforts continue to help enable Line 5 in the Straits to operate safely and reliably, just as it has done for the last 60 years.

Line 5 can remain a vital source of energy for Wisconsin and the surrounding region, while protecting the environment, by making sure that Line 5 continues to be operated and maintained in the safest manner. Calls to shut down Line 5 do not give adequate consideration to the critical role Line 5 plays on the regional energy transportation network or the economy of the Great Lakes region.

Plains and its affiliates operate throughout the continental United States and rely on the safety regulations imposed and administered by the Pipeline and Hazardous Materials Safety Administration (PHMSA) to assure the safety and reliability of pipelines in the states in which we operate. It would concern us greatly if individual states were to exert overlapping jurisdiction to determine when interstate or international pipelines could operate safely. Such a duplicative approach would pose a significant threat to critical infrastructure by leading to supply disruptions on a regular basis.

We encourage the WDNR to deeply consider the significant energy reliability and economic effects of the closure of Line 5 on parties other than Enbridge, including Plains and residents of Wisconsin and surrounding regions, in making further determinations regarding relocation of the Line 5 segments from the Bad River Band Reservation, as requested by the Bad River Band. Further, the relocation project will have significant positive economic impact for Wisconsinites and Native owned businesses, all while minimizing impact on the environment.

About Plains Midstream Canada (Plains)

Plains is a transportation and midstream service provider. We specialize in transportation, storage, processing and marketing solutions for crude oil, natural gas, and natural gas liquids (NGLs). Plains is headquartered in Calgary, Alberta and has more than 1,500 employees in Canada and the U.S. We are an indirect subsidiary of Plains All American Pipeline, L.P. (Plains All American), a publicly traded master limited partnership headquartered in Houston, Texas.

Sincerely,

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Plains Midstream Canada

Sterling Koch

[Sterling Koch \(Mar 17, 2022 10:19 PDT\)](#)

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