ENBRIDGE OVER TROUBLED WATER
REPORT OVERVIEW AND RECOMMENDATIONS

Please find our new report, Enbridge over Troubled Water — The Enbridge GXL System's Threat to the Great Lakes. This report details the significant risks posed by Canadian pipeline giant Enbridge's pipeline system to the Great Lakes region. As the report details, Enbridge owns and operates a labyrinth of pipelines that wend their way through the Great Lakes region. This system creates a massive risk to waters and communities in the pipelines' paths. It also imperils the planet's climate.

Many of Enbridge's pipelines already carry syncrude from destructive tar sands mining and heavy toxic tar sands oil that would have been carried by the now rejected Keystone XL pipeline — both highly carbon polluting substances. Enbridge is currently carrying out plans to more than double the amount of nearly impossible to clean up tar sands oil flowing under and near the lakes, streams, wetlands and communities of the region.

Keystone XL was rejected due in large part to the fact that it would have enabled more tar sands oil production and more carbon pollution. Tar sands oil is about 20% more carbon polluting than regular oil on a well to wheel basis. With all major countries, including the U.S. and Canada, aspiring to a goal of allowing no more than 1.5 degrees C of warming, tar sands oil simply cannot be developed in any substantial amount. This is why rejecting Keystone XL was the only choice if we are to meet these climate saving goals.

Like TransCanada's Keystone XL was properly rejected, the Enbridge GXL tar sands expansion must also be stopped. Enbridge GXL would increase tar sands oil transport into the Great Lakes region by about 1.1 million bpd — substantially more oil than was proposed for the rejected Keystone XL Pipeline. While Keystone XL was in the political spotlight, Enbridge was working behind closed doors with regulators to avoid the type of public environmental review that ultimately and appropriately led to the denial of the Keystone XL pipeline.

Enbridge is already bringing additional tar sands across the border. It plans to move it with new and existing pipelines throughout the Great Lakes to destinations as far as the Gulf Coast and East Coast. The extreme risks of tar sands to waters and communities have recently been confirmed by the National Academy of Sciences[1] which found that tar sands transported as largely unrefined diluted bitumen is nearly impossible to clean up when it spills. And this heavy oil will inevitably spill, as it did in July of 2010 into the Kalamazoo River, a disaster that nearly reached Lake Michigan and pollutes stretches of the river to this day. In fact, since 2005, Enbridge has been responsible for 763 spills, totaling 93,852 barrels of both light and heavy crude, including tar sands crude, which have spilled and devastated local waterways.

In order to protect the Great Lakes and meet our carbon reduction goals, we recommend the following steps be taken to stop Enbridge GXL:

- In making the national interest determination for allowing any more tar sands oil transport across the border on any Enbridge GXL line, the U.S. State Department must apply a "climate test" to ensure the project does not exacerbate the problem of carbon pollution.
- The U.S. State Department should immediately order that Enbridge's cross border expansion plan — called the Enbridge double cross because it involves

switching flows on two lines (Alberta Clipper and Line 3) to double the flow of tar sands oil on the Alberta Clipper Pipeline across the border while escaping environmental review — be halted until the State Department conducts a full environmental review and national interest determination regarding the impacts of bringing more tar sands oil across the border along the Alberta Clipper. The State Department acquiesced to the double cross, but it can stop it.

- The U.S State Department should require a full environmental review and permitting process for the replacement of Enbridge's transboundary Line 3 pipeline before a decision is made as to whether it can be expanded and used to transport heavy tar sands oil.
- The U.S. EPA should work with the Army Corps of Engineers to conduct a thorough Environmental Impact Statement to assess the cumulative impacts of the Sandpiper and Line 3 pipelines in Minnesota, and should designate the tribal governments of affected Ojibwe Bands as cooperating agencies, due to their unique knowledge of cultural and environmental resources in the region.
- All state and federal environmental reviews on Sandpiper, Line 3, and Alberta Clipper must assess all upstream, downstream, and indirect impacts, including disparate impact on indigenous peoples and communities of color, environment and climate impacts, and threats to critical resources in territory ceded by Ojibwe bands to the US government in the 1854, 1855, and 1867 Treaties, where tribal members retain constitutionally protected rights to subsist off the land.
- The Wisconsin State Department of Natural Resources, U.S. Army Corps of Engineers and the National Park Service should not allow a twin line (Line 66) that would double the capacity of Enbridge's Line 61 through Wisconsin and Illinois.
- While Sandpiper and Line 5 do not carry diluted bitumen, due to their location in extremely sensitive and culturally important areas, existing Line 5 should be shut down by Michigan Governor Rick Snyder or Attorney General Bill Schuette and proposed construction of the Sandpiper pipeline should not be permitted by the Minnesota Public Utilities Commission.

These recommendations should be enacted swiftly to protect our climate, the precious resources in the Great Lakes region, and the human rights of its inhabitants.

1 National Academies of Science, Committee on the Effects of Diluted Bitumen on the Environment. Board on Chemical Sciences and Technology, Division on Earth and Life Studies, Spills of Diluted Bitumen from Pipelines: A Comparative Study of Environmental Fate, Effects, and Response. 2015.