



25288 County 2
Shevlin, MN 56676
December 13, 2022

LTG Scott A. Spellmon
U.S. Army Corps of Engineers
441 G Street NW
Washington, DC 20314

Boozhoo, Lieutenant General Spellmon,

I'm a retired Metallurgical Engineer writing from 1855 Treaty Territory regarding growing concerns for the current Enbridge worksite at Walker Brook in Clearwater County, Minnesota. These concerns were only heightened by the December 7 Keystone pipeline rupture at Mill Creek, a geography so similar to ours with a creek adjacent to an uphill pipeline corridor. We appreciate the work you are doing there in response to the latest Keystone pipeline failure. We are hopeful to prevent a need for similar response at our location, which geologically is far more water-filled and unstable than that of the Kansas plains.

We've been watching Walker Brook valley with concern since early August when we noticed Enbridge's timber matting access road had been reinstalled west of Clearwater County 110. In late August, my partner discovered an open hole above the pipeline corridor and we began watching this place even more closely. [47-degrees, 47-minutes, 63-seconds, and -95-degrees, 28-minutes, 35-seconds.] This photo shows upwelling as indicated by surface ripples. Since then, we've taken several hikes in to monitor and test at this location, concerned about impacts to the land and water quality.



L3/93 corridor sinkhole 8/25/22 credit: Dan Gaither

Located within a 399-acre section of state tax land and County Memorial Forest, this crossing of Enbridge's Line 3/93 pipeline at Walker Brook is in a precarious valley of deep glacial till and forested peatbog very similar to LaSalle Valley, where Enbridge is also currently struggling to remediate multiple upwelling water locations. These two valleys are like mirror images of each other on either side of the Mississippi River Line 3/93 crossing, where Enbridge experienced multiple frac-outs into the large wetlands of Mississippi River headwaters. This is clearly a fragile geology, full of water, which opponents to the Line 3 project testified was too much of a risk for a Tar Sands pipeline project.

We see now, that heeding citizen warnings would have been prudent. The applicant's route was a bad idea that was not given enough geotechnical or hydrological study to assure prevention of avoidable tragedies. We remain disappointed that the USACE refused to perform an EIS as that work may have saved us these troubles. A year after Enbridge began flowing tar sands crude through

their pipeline, we still await resolution of upwards of 4 dozen sites of deep groundwater upwellings, many of which, based on Enbridge's lack of transparent communication regarding their environmental failures both during construction and since formal construction ended, we believe the state remains ignorant.

As a retired Metallurgical Engineer, my concerns include those regarding the pipeline integrity in Walker Brook Valley. If the pipeline is floating in a veneer of peat and/or being fatigued by the fluctuating water levels, the stresses could exceed designed metallurgical limits. I am concerned the Canadian Corporation, as evidenced in [this video](#), has found this installation to be more problematic than expected. We know that Enbridge has struggled to complete their work at this crossing for over a year, yet there has been no release of information on this site to the public, save that done by Waadookawaad Amikwag in their announcements and webinars. Nor does it appear the DNR or MPCA are communicating with Clearwater County Commissioners or the County Land Commissioner on this concern. As this is Clearwater County Memorial Forest, public land with multiple deer stands as hunting remains open this weekend, we still have no notice of this danger to the public from the state or federal agencies. We are concerned that Enbridge alone knows of the risks here and that state and federal agencies may remain uninformed.

You received memos from Minnesota US [Representative Betty McCollum](#), on 10/14/22, and [Representative Ilhan Omar](#) more recently, regarding the concerns of Waadookawaad Amikwag, a citizen scientist group seeking your assistance for federal investigation of this situation. As USEPA recently replied to Representative McCollum's memo, we look forward to receiving your response soon as well. We are hopeful for a robust response to our specific concerns of deep underground upwelling water flows.

I write today with evidence of recent dirt piles adjacent to the Enbridge Line 3/93 corridor; another possible indication this project in the valley may involve pipeline integrity concerns.





In addition, we hold concerns for the excessive water removal from the valley as Walker Brook feeds The Red River of the North. Water being pumped up the hillside and over the Laurentian Divide now overwhelms the Enbridge dewatering station and flows across County 110 north of the project site, as indicated in the photo below. These ponds and brook that result are situated in the Mississippi River watershed and the excess water appears bound for Daniel Lake in the Clearwater State Wildlife Management Area. How will these millions of gallons of water being moved from one watershed to another impact both watersheds and the wildlife and people who rely on them?



Finally, we are concerned to know if this location has been reported to PHMSA and if their representatives might be of assistance to watch closely over this worksite of concern. And we urge

your Engineers to ask Waadookawaad Amikwag for assistance as they are watching closely and have data and evidence on the nature of this concern that might be helpful in resolution.

We look forward to watching state and federal agencies build relationships of trust with the public monitors to ensure full enforcement of the Clean Water Act in Clearwater County and across Minnesota.

Thank you for your consideration. Miigwech Bizindaawiyeg.

Sincerely,
Jami Gaither
Alida, MN
218-657-2321

cc:
Michael S. Regan, USEPA
Alan K. Mayberry, PHMSA
Timothy Gaither, PHMSA
U.S. Congresswoman Betty McCollum, Minnesota 4th District
U.S. Congresswoman Ilhan Omar, Minnesota 5th District
Anna Hotz, Minnesota Pollution Control Agency
Randall Doneen, Minnesota DNR
Waadookawaad Amikwag
Sheriff Darin Halverson, Clearwater County Sheriff's Office
Andy Anderson, Clearwater County CCSO EMS
Bruce Cox, Clearwater County Land Commissioner