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November 11, 2013

Mr. Jeff Kimble
Federal On-Scene Coordinator and Incident Commander
U.S. Environmental Protection Agency
9311 Groh Road
Mail Code: SE-CI
Grosse Ile, MI 48138-1697

Re: In the Matter of Enbridge Energy Partners, L.P., *et al*,
Docket No. CWA 1321-5-13-001

Dear Mr. Kimble:

This is to respond to the request in your letter of October 25, 2013, that Enbridge Energy, Limited Partnership (Enbridge) provide a detailed explanation of the current status of work required in Morrow Lake and the Morrow Lake Delta. This letter also responds to requests set forth in your letter of August 15, 2013. Both letters relate to Enbridge's continuing effort to implement the Administrative Order (Order) issued by the United States Environmental Protection Agency (U.S. EPA) dated March 14, 2013.

As set forth below, Enbridge has explored numerous alternative approaches for completion of dredging as required under the *2013 Submerged Oil Removal and Assessment Work Plan* approved May 13, 2013 (2013 SORA WP). The search for alternatives resulted directly from the unexpected denial of access to the originally selected Dredge Pad by Comstock Township on August 22, 2013. Enbridge has developed an alternative plan for completion of dredging that will achieve the cleanup results required under the 2013 SORA WP. The details of this alternative plan are described below. Unfortunately, implementation of the alternative plan will require additional time beyond that provided in the 2013 SORA WP. Enbridge accordingly renews its prior request that U.S. EPA grant additional time in order to allow for a safe and environmentally-effective completion of the 2013 SORA WP objectives.

Enbridge does not expect this request to affect implementation of any portion of the 2013 SORA WP other than those areas within Morrow Lake and the Morrow Lake Delta. We anticipate timely completion of dredging at all other areas of the Kalamazoo River, including Ceresco, Battle Creek Mill Ponds, and identified sediment traps (MP 10.40, MP 10.50, MP 21.50, MP 26.00, MP 28.25, and MP 36.10) outside of Morrow Lake, as required under the 2013 SORA WP.

A. Efforts to Select Feasible Locations for Dredge Pads and to Develop Alternative Approaches to Use of Pads

The U.S. EPA's letter of August 15, 2013 asked that Enbridge provide a detailed explanation of Enbridge's efforts to obtain alternative dredge pad locations, including a description of other possible sites, dates when landowners were contacted, and a summary of the current status of those efforts. The summary follows.

1. Efforts Leading to Selection of Original Dredge Pad Site (October 2012 to August 2013)

Section 2.3 of the 2013 SORA WP requires that dewatering pads be "designed and constructed to accommodate the necessary volume for the planned dredging operation, including retention of staged materials, a full shift of dredging slurry, and 24-hours of storm water from a 10-year storm event."

Enbridge's efforts to locate and select pads that met this requirement began in the fall of 2012, following issuance of the U.S. EPA's proposed order on October 3, 2012. Enbridge spent months assessing, viewing, and determining constructability of 16 potential dredge pad sites. During this time, crews investigated the potential sites in order to determine which would be most appropriate for the support of dredging operations. The property evaluations for Morrow Lake and the Morrow Lake Delta dredge support sites are summarized in the enclosed Communication Log-Alternative Dredge Pad Sites.

Following receipt of the U.S. EPA's March 14, 2013 Order, which required additional dredging, Enbridge immediately increased its effort to identify and secure dredge pad locations for each dredge area. Several criteria were considered when determining the appropriate locations for each dredge pad. These criteria included, but were not limited to: property size, access, owner interest, historical contamination on the site, environmental impact (trees, wetlands, etc.), proximity to residential neighborhoods, zoning, proximity to class A/designated truck routes, and overall impact to neighboring business and residential communities. Each site was also assessed for parking of vehicles, staging of equipment, trailers, lights, debris, noise, and other activities associated with temporary construction sites. The property evaluations for the Morrow Lake and the Morrow Lake Delta dredge pad are shown in the Communication Log-Alternative Dredge Pad Sites, enclosed.

The site best meeting the above-mentioned criteria for dredging Morrow Lake and the Morrow Lake Delta was the CCP Development, LLC (CCP) Dredge Pad location, which is zoned Light Manufacturing. Site preparation activities were initiated June 17, 2013 based on the understanding that the site was appropriate for the intended use and was consistent with temporary infrastructure construction completed in Comstock Township in the past to support the project objectives. Enbridge informed the U.S. EPA of its selection of the CCP site for the dredge pad in its submission dated April 4, 2013 (initial submission date of the SORA). After the U.S. EPA approval, the 2013 SORA WP was finalized on May 13, 2013.

Following approval of the 2013 SORA WP, Enbridge obtained a Soil Erosion and Sedimentation Control (SESC) permit and Notice of Intent (NOI) coverage. On June 17, 2013, Enbridge initiated dredge pad development at the CCP site located at 5071 Gull Road Comstock, Michigan. Work at the location was halted on June 27, 2013 in response to notification by Comstock Township Supervisor, Ann Nieuwenhuis that, though not required for previous activities, the township would now require Enbridge to submit a Site Plan Review (SPR) application to the Commission and receive approval prior to the continuation of work activities. Prior to the notification for the necessity of the SPR application process, substantial costs were incurred in preparing this site in order to meet the aggressive schedule ordered by the U.S. EPA. Enbridge submitted the SPR application and related materials on July 9, 2013 and requested a special meeting to expedite the review process. The Commission denied the request for a special meeting and the SPR was put on the agenda for the next regularly scheduled Commission meeting. On July 25, 2013 the Commission reviewed the SPR application for temporary dredge pad construction activities at the CCP Dredge Pad location. Following review and discussion, the Commission referred the application to the Zoning Board of Appeals (ZBA).

Enbridge developed information for the ZBA and presented information at the August 19, 2013 meeting. The ZBA approved the request for a special exception for the proposed temporary dredge pad. The ZBA recommended that the Commission grant the special exception, and on August 22, 2013, the Commission again considered the issue. Despite the positive recommendation from the ZBA, the Commission denied the request for use of the CCP Dredge Pad site citing potential negative impacts to adjacent business and residential properties. A second site in Comstock Township for the E 3.5 Staging Area (located at 9513 Miller Drive in Galesburg, Michigan) was reviewed and approved by the Commission on August 29, 2013.

It is our understanding that the U.S. EPA was aware of local opposition to the selection of the CCP site for a dredge pad site based on public comments received by the Agency prior to the August 22, 2013 denial. In addition, Enbridge informed the U.S. EPA, by letter dated August 8, 2013, of the controversy surrounding the CCP site zoning decision, and the potential impact of this decision on Enbridge's ability to meet deadlines in the 2013 SORA WP. The U.S. EPA responded by letter dated August 15, 2013.

2. Unsuccessful Search for an Alternative Dredge Pad Site (August 2013 to October 2013)

The U.S. EPA's letter of August 15, 2013, written one week prior to the Commission's final denial of the CCP site, asked whether Enbridge had considered options other than the CCP site, including alternative approaches such as the use of multiple, smaller dredge pads or other dredging methodologies, such as dredging in the dry. Enbridge, in fact, has considered such alternatives and, as set forth below, intends to propose use of one such alternative, which would involve lowering the level of Morrow Lake.

Following the denial by Comstock Township on August 22, 2013 of the use of the CCP site, Enbridge immediately began evaluating alternative dredge pad/access points. Lessons learned from the Comstock Township Planning Commission hearing were that a suitable site would need to meet the following minimum criteria:

- 1) be located a significant distance from residential neighborhoods,
- 2) have minimal impact on local businesses,
- 3) not place undue hardship on the community or interfere with community activities, and
- 4) be located in an area zoned Heavy Industrial or in an area suitable for a Special Use Permit.

Based on these criteria, the evaluation identified four (4) potential properties that warranted further assessment. The alternative sites were identified as follows:

D – Kalamazoo Well Heads

H – Former Consumers Power Site

I – Farm Field Upstream (120 acre parcel)

K – Across M-96 (35 acre parcel)

Ultimately, none of these sites met the required criteria or were eliminated for other reasons identified below.

Site D (adjacent to the City of Kalamazoo well heads) was not suitable due to the presence of a horizontal based municipal well field.

Site H (the former Consumers Power Site) is a historic remediation site, and has been involved in estate proceedings. The U.S. EPA asked Enbridge to delay consideration of this site until the estate proceeding were complete.

Site I (farm field 5 miles upstream from Morrow Lake Delta) presented many operational obstacles based on its distance from the actual dredge site. The property is zoned Agricultural and is located in a township with no prior experience with dredging operations, and would also require extensive river closure.

Finally, Site K (the 35 acre parcel across M-96) also presented multiple issues. The site is zoned Agricultural, and piping to the site would be problematic due to the need to pass through a public park and recreational area, cross a major highway (M-96) and cross a rail line.

The attached "Communication Log-Alternative Dredge Pad Sites" documents Enbridge's efforts to vet these four (4) alternative sites fully.

3. Consideration of Alternatives to Use of Dredge Pads (initiated in September 2013)

In parallel with the review of available dredge pad sites in proximity to Morrow Lake and the Morrow Lake Delta, Enbridge initiated assessment of alternative sediment removal options. Enbridge organized a multi-faceted team (engineering consultants, construction personnel, legal, and real estate/property professionals) to review and evaluate the options should none of the alternative dredge pad locations prove viable.

The list below identifies the principal concepts that were vetted but not included in the final recommendation, together with the primary reasons these alternatives were not selected:

- a. Containing the river within a system of pipelines and pumping it around the work area to allow for dry excavation was determined not to be technically feasible based on a review of annual river flows which showed rates of up to 1,300 CFS.
- b. Dry excavation of the entire area (except for the deep channel within the neck) by means of cordoning off the area with sheet piling and dewatering was possible. It has been a proven method of removal on this project, and it allows free movement of equipment within the work area. However, constructing large sheet pile zones within a wet area would require extensive pumping and water treatment. A modified version of this approach was ultimately incorporated into the current plan being proposed.
- c. Construction of an "aqueduct" sheet pile wall to channelize the river was also considered, but eventually eliminated as an option because the velocity in the channelized area would increase potential scouring of adjacent areas and move large amounts of sediment into Morrow Lake.
- d. Evaluation of the use of mechanical dewatering equipment allowing for the use of "sed vac" technology, which generates a low solids concentration discharge, without requiring geotube type dewatering was conducted. This alternative was found to be technically feasible; however, the approach would require construction of a large land-based concrete foundation to handle the mechanical vibrations of the rotating equipment. Also, the dried soils that are discharged from this system likely would not meet shear strength requirements of the present landfill disposal options and thus require additional mixing facilities.

4. Proposed Alternative to Complete Dredging Activities in Morrow Lake and the Morrow Lake Delta

Following the process described below, Enbridge has determined that the most feasible and effective alternative for completion of sediment removal in the Morrow Lake area includes (a) addressing the "Neck" and portions of E 4.0 by means of Suction Dredge, and (b) then lowering the lake level to facilitate the construction of sections of aqueduct to allow for dry patches in the upper delta to be addressed using dry excavation and soil stabilization. The recommended approach is based on conducting activities in non-winter conditions, as explained in detail below.

Specifically, Enbridge proposes a two-phase approach for the remaining dredge activities in Morrow Lake and the Morrow Lake Delta target areas. Phase I is scheduled to be completed by the end of December 2013, prior to ice conditions as required by STS HydroPower, Ltd. (STS), see enclosed letter. Phase II is proposed to be completed by the end of October 2014. The two phases would consist of the following activities.

Phase I (E 4.0 Containment Structures and Locations within the Morrow Lake Delta)

The first phase of the remaining dredge activities would consist of removing, by hydraulic dredge, 'moderate' and/or 'heavy' poling delineations in polygons adjacent to the E 4.0 Containment Structures System (from MP 37.35 to MP 37.80 within the Morrow Lake Delta) as well as from a single polygon within Morrow Lake (near MP 38.20). Removal of E 4.0 Containment would coincide with the sediment

removal activities proceeding in an upstream to downstream fashion to minimize movement of sediment downstream. Enbridge plans to use an industrial suction dredge (pump/vacuum) mounted on an excavator to complete the sediment removal in this area. To support this operation, dredged sediment will be pumped to an on-site water storage (frac tanks) and treatment system located in the parking lot adjacent to the River Oaks Park boat launch. This will be used as a staging area for the water and sediment mixture produced by the dredge. The sediment slurry will be pumped through piping into the water storage vessels where the solids would then be allowed to partially separate from the liquid component. A more concentrated slurry would then be loaded into tanker trucks and either directly transported to an approved treatment and disposal facility or transported to an existing off-site dewatering/mixing pad. The separated water would be treated through an on-site water treatment plant and discharged back into the river pursuant to an approved National Pollutant Discharge Elimination System (NPDES) permit. The work plan describing the details of Phase I was submitted under separate cover to the U.S. EPA on November 2, 2013 for review and approval.

The original Phase I work plan called for high capacity storage tanks (two million gallon plus temporary containment vessels) to be used to stage the slurry for treatment. This process would have required approximately 15 round trips per day by tanker trucks to offsite facilities as significantly more water could be processed on site reducing the volume transported. However, the use of large storage tanks was rejected by both Kalamazoo County and Comstock Township and limited the operation to a maximum of 10 frac tanks. As a result, this process now requires up to 150 round trips per day by tanker trucks which is a considerable public safety concern for Enbridge. Enbridge will be in discussions with the U. S. EPA as to how to reduce risk to the public, but yet meet the desired objectives for sediment removal.

Phase II (Remaining Areas of Morrow Lake and the Morrow Lake Delta)

The second phase of dredging activity would consist of a coordinated effort with STS to temporarily lower the water level of Morrow Lake in order to create a dry excavation opportunity for the southern portion of the Morrow Lake Delta. STS has agreed to lower the water level in Morrow Lake but only during a specified timetable when maximum water flows are less than 1,000 cubic feet per second (cfs) (normally July/August). This time frame also has the advantage of avoiding impacts to hibernating wildlife and the fish spawning season. This method would allow for the dry excavation of impacted sediments using conventional methods. Enbridge presented this method to the U.S. EPA on Tuesday, October 29, 2013.

The proposed Phase II approach has many advantages over other methods that were evaluated. Excavation in the dry will reduce or minimize the amount of water handling and treatment. It also allows a much more precise and focused removal of impacted sediments, minimizes ecological impacts to hibernating wildlife and the fish spawning season and reduces project duration. This approach involves accessing the exposed lake bed using mat roads, as required, followed by excavation of the target sediments, stabilization as required, and transport to an appropriate disposal facility. In certain areas not exposed by the lower water levels, some limited dewatering will likely be required. Excavation, transport, and disposal will continue using a logical sequence until the sediment in the target polygons has been removed and verified. This methodology is subject to approval by local, state and federal authorities.

B. Timing of Implementation of Proposed Alternative

Phase I

Phase I is already underway with the fabrication of materials and mobilization of equipment. All required permits and approvals have been received by local and state agencies. Work Plan approval is pending from the U.S. EPA. Completion is expected by the middle to end of December 2013.

Phase II – Impediments to Winter Operations

1. Water Operations

Officials from STS require that Enbridge have all water operations within Morrow Lake suspended prior to initial ice conditions. STS' position relates to infrastructure and dam safety concerns for the on-going hydro-power operations at the Morrow Lake Dam. STS has indicated that its position prohibiting water operations during winter months is non-negotiable.

In addition, disturbing river ice increases the potential for "ice-damming," which could cause localized flooding and damage to properties both upstream and downstream of the work. Of particular concern is the risk of ice-related damage to the downstream Morrow Lake Dam.

Ice also would be a significant obstacle to dredging the Kalamazoo River effectively and safely, particularly in the Morrow Lake Delta. The dredge and supporting boats would have to navigate around and/or through ice floes which would delay production and cause safety concerns. The slurry lines would need continuous maneuvering through the ice, which could cause cracks or ruptures and the slurry lines would continuously freeze and clog.

2. Containment

As part of a November 2012 submittal to the U.S. EPA, SWAT Consulting, Inc. (SWAT) assessed whether winter containment structures in the River are feasible. SWAT's review of available options concluded that winter-long containment is not feasible for a variety of reasons. The factors prohibiting the installation of winter containment include:

- Known presence of frazil ice throughout the river during most winter months,
- Potential creation of ice jams and associated impacts,
- Limitations of available containment systems,
- Navigational hazards posed by winter containment, and
- Risks to worker safety associated with attempts to maintain containment during winter months.

In addition, SWAT concludes that use of winter containment is likely to impact winter recreational users of the river (due to the risks of catastrophic failure of containment systems), pose a risk of adverse effects to downstream areas, and present the possibility of river bottom erosion and scouring.

In light of these risks, some affected property owners may oppose winter containment due to the risk of either backwater effects or a catastrophic failure that could affect the owner's property. It is also possible that winter conditions and the potential for containment structures to catch debris and affect ice movement. These conditions could result in safety and property damage concerns.

As noted above, STS has specifically and repeatedly stated that the placement of any structures, including containment in Morrow Lake during the winter, will not be tolerated. STS' explicit permission is legally required for Enbridge to perform the work needed to remove remaining sediment.

Your letter states that the U.S. EPA may consider over-winter containment to be necessary if all sediment, subject to removal, is not removed prior to spring melt. For the reasons stated above, Enbridge does not believe that over-winter containment is possible. Moreover, the proposed Phase I alternative would remove sediment (prior to December 31, 2013) of particular concern to the U.S. EPA (such as sediments located near the E4 and other containment structures).

3. Impact on Dredge Pad Operations

Any attempt to conduct dredging operations during winter months is likely to result in accumulation of ice in the settling tanks and would decrease the effectiveness of the sediment slurry processing for shipment (thus increasing the risk of equipment damage and failure).

Similarly, winter operation is likely to lead to an accumulation of ice in the sumps that would decrease the available storage for water, and would limit the rate of discharge. Untreated ice would have to be melted prior to treatment.

In addition, water treatment operations would be greatly compromised. This presents not only an obvious equipment issue but also a health and safety issue. Frozen pipes, vessels, and fittings will be under pressure. Those structures could rupture or move violently while breaking down a pipeline or fitting.

In addition, Enbridge reviewed several resources to utilize experience of other dredging projects. One of the more relevant sources is the US Army Corps of Engineers Technical Manual for Dredging:

“Winter ice-over will effectively shut down dredging operations. Ice-over will determine the length of the dredging season and can have a significant impact on sustained production and the total required duration of the project. The average date for ice-over and spring breakup should be determined and used in setting a projected dredging season.”

4. Impact on Trucking

Trucking operations during the winter months are far more hazardous. Hazards include the increased driving on snow and/or ice covered roads to dumping at the landfill.

5. Impact on Water Quality Monitoring

The turbidity sensors currently used at the site will operate down to -5 degrees Celsius with a high degree of accuracy. Like any electronic equipment, however, they have limitations. Winter operation is likely to result in an increased potential for freezing sensors, cracking or breaking of cables, and damaged instrumentation due to floating ice. Water quality monitoring teams will be at significant additional risk conducting on-water monitoring during winter conditions.

6. Potential Biological/Habitat Impact from Winter Dredging

The general effects of dredging the Morrow Lake Delta during summer and fall are described in the permit application alternatives analysis (which did not contemplate winter dredging). Winter dredging exacerbates the impacts by disturbing the area when species are hibernating or are at vulnerable life stages or seasonal periods.

Painted, snapping, map, and soft-shell turtles have all been observed and collected within the Morrow Lake Delta dredge area during 2010 and 2011. Blanding's turtles (state special concern species) were observed and collected in locations a short distance upstream. Painted and snapping turtles overwinter in the Morrow Lake Delta's soft sediment areas. Dredging in the winter when these animals are hibernating eliminates the possibility of capturing and relocating them prior to the dredge and reduces the likelihood of the animals escaping the location on their own. As a result, animal mortality would undoubtedly be substantially higher than dredging following their emergence in the spring (late April or early May). The same holds true for furbearers such as muskrats and beaver that overwinter in the delta.

Dredging over the winter would likely run into the spring spawning season for the primary fish species in Morrow Lake: Black Crappie, Northern Pike, Yellow Perch, Walleye, and Bass. Spawning for these species generally runs from just after ice-out through mid-June (early July for Bass). As a result, the year class for these species would likely be reduced as a consequence of the temporary loss of spawning habitat and direct mortality of eggs and hatchlings (as well as some adults). To address these injuries, the State of Michigan generally imposes a restriction on aquatic habitat projects between May 1 and July 1.

Eagles nest in close proximity to Morrow Lake and use the Morrow Lake Delta area for foraging. Open water areas in and around the Morrow Lake Delta also provide areas for winter congregation. The Bald and Golden Eagle Act prohibits anyone from "taking" bald eagles. Among other actions, "take" includes disturbance of bald eagles to the degree that it substantially interferes with breeding, feeding, or

sheltering behavior or results in injury. The most sensitive period for eagles is the courtship and nest-building period between mid-February and mid-March. Eggs are laid from late March to early April, hatching about seven weeks later. Fledging occurs in June and early July. Nest departure occurs at 8 to 14 weeks.

According to the U.S. Fish and Wildlife Service:

Eagles are not as sensitive to human disturbance during migration and winter as they are while nesting. However, wintering eagles congregate at specific sites year-after-year for purposes of feeding and sheltering. Eagles rely on these established roost sites because of their proximity to sufficient food sources. Permanent landscape changes may eliminate these "relied upon" areas and force eagles to seek out other wintering roost and foraging areas. Depending on the proximity of other suitable roost or foraging areas and the condition of the affected eagles, loss of these areas can harm eagles.

Winter dredging would eliminate the Morrow Lake Delta as an open water congregation and foraging area for eagles and run into the courtship, nesting, and egg-laying period when eagles are most sensitive to disturbance. Depending upon the sensitivity of the eagle pair nesting near the lake, dredging disturbance could cause them to abandon the nest.

7. Community Considerations

With daylight hours limited to approximately 8:00 am to 5:00 pm in the winter months in Michigan, it would be necessary to flood the area with generator-powered lights. Snow cover in the area will magnify the amount of "light pollution" emitted and likely result in discontent and numerous complaints from area residents.

With low temperatures and less leaf cover on trees, noise from dredging and construction equipment will travel greater distances causing a nuisance to area businesses and residents.

8. Worker and Community Safety Concerns

Safety of workers and the community, in general, are of the utmost importance and a prime driver in evaluating the success of this project. The safety record of the response effort during the past three years affirms the established safety culture, consistent availability of safety resources, and risk abatement strategies employed to assess proposed tasks. As for all proposed response strategies, Enbridge considered environmental conditions in the evaluation of worker and community risk associated with the work. The risk evaluation matrix is based on severity of consequence and the likelihood of an event happening. As Enbridge considers completion of work activities in the winter, we find the ability to control event likelihood is reduced (resulting in an increased likelihood) and the severity of consequence also increases to a point at which the benefit of completing certain work activities is significantly reduced as the risk to worker and the community increases. Heavy truck traffic associated with the project would also be an increased risk to the community during winter conditions. Enbridge therefore believes that conducting dredge operations in winter conditions poses an unacceptable, increased risk to workers and the community.

Factors considered which increase likelihood of an event happening include; reduced daylight, increased cold-stress, reduced friction, low humidity, reduced visibility, unstable surfaces, and glare. Enbridge also considered the following consequences. Prolonged exposure to freezing or cold temperatures may cause serious health problems such as trench foot, frostbite, and hypothermia. In extreme cases, including cold water immersion, exposure can lead to death. Some of the specific hazards associated with working in cold weather conditions include:

- Driving accidents due to unsafe road conditions,
- Carbon monoxide poisoning,

- Slips and falls due to unsafe walkway conditions,
- Hypothermia and frostbite due to the cold weather exposure,
- Being struck by falling objects such as icicles, tree limbs, and utility poles, and
- Electrocutation due to downed power lines or downed objects in contact with power lines.

Phase II – Planning and Execution

- a. Enbridge proposes to develop the detailed work plan for Phase II in conjunction with representatives from the U.S. EPA over the coming weeks in a manner similar to that used to develop other significant work plans. Enbridge is open to considering modifications to the Phase II plan to help meet the objectives of the U.S. EPA and completion of the Order.
- b. Permit modifications and other approvals, as required by federal, state and local authorities, will begin immediately upon Phase II Work Plan approval by the U.S. EPA.
- c. Execution of dredge activities will begin when flow conditions are below 1,000 cfs and authorization is given by STS.
- d. The lowering of the Morrow Lake reservoir and dry excavation of the bottomlands, identified for removal, is anticipated to extend over a 3 month period.

C. Response to Other Concerns in the U.S. EPA letters dated August 15 and October 25, 2013

The discussion above addressed the principle purpose of this letter: to set forth Enbridge's proposed alternative for completing work required under the Administrative Order and 2013 SORA WP, and to request modification of the Order and 2013 SORA WP in order to allow for completion of sediment removal. In addressing those issues, Enbridge has addressed many of the questions set forth in the U.S. EPA's letters of August 15, and October 25. Remaining questions and concerns from those letters are addressed below.

1. Sediment Build Up and Sheening

The U.S. EPA's October 25, 2013 letter indicates the Agency's concern with what the U.S. EPA perceives as "significant Enbridge Line 6B oil build up" against the E 4.0 containment structure.

The high-precision bathymetry monitoring of the E 4.0 containment system (Rounds 1 through 5 for 2013 attached as part of the Phase 1 Work Plan) indicates that little to no sediment actually has accumulated in the area of E 4.0. In most instances, the data show either minor deposition (less than 2 tenths of a foot) or, more commonly, a minor reduction of the sediment accumulated near E 4.0. This fact is substantiated by the weekly underwater video monitoring of the curtain which shows very little if any accumulated sediment on the curtain.

Enbridge's proposed alternative would remove sediment from E 4.0 and other containment structures prior to December 31, 2013 as required under the current Order and 2013 SORA WP.

The October 25, 2013 letter also expresses the following concern:

"Recent poling rounds, even with lower sediment temperatures, show Enbridge Line 6B oil to have an increased presence in Morrow Lake, although it is still in the "light" sheening category. We also see spontaneous sheen in Morrow Lake now when there are lake turnovers due to atmospheric conditions. This did not occur last year before a

significant portion of the 90 acres of heavy/moderate sheening oiled sediments in the delta were allowed to flush with the heavy spring rains into the lake.”

Review of the poling information from Morrow Lake beginning with the 2013 Spring Reassessment through Round 6, does not show clear trends for “light” categories increasing. No conclusions can be drawn from the evaluation of the poling metric. The available data does reinforce the subjectivity and unreliability of the poling metric for actually assessing the presence and amount of submerged Line 6B oil. Regarding the alleged increase in the occurrence of “spontaneous sheen in Morrow Lake now when there are lake turnovers due to atmospheric conditions.” Enbridge is unaware of any data supporting this statement. Similarly, Enbridge is unaware of any data that support the statement that “a significant portion of the 90 acres of heavy/moderate sheening oiled sediments in the delta were allowed to flush with the heavy spring rains into the lake.”

2. Timely Permitting

The October 25, 2013 U.S. EPA letter also indicated a concern that Enbridge has not applied for permits or permit amendments for the sediment traps that exceeded the “triggers” under the 2012 Sediment Trap Monitoring and Maintenance Plan. In fact, as of October 25, 2013, all permits and/or permit amendments have been submitted to the Michigan Department of Environmental Quality (MDEQ) with the exception of MP 28.25. That permit application was not submitted based on discussions with the MDEQ, indicating that they would not issue that permit due to the high quality of the wetland area at MP 28.25. It was our understanding that MDEQ was preparing correspondence to the U.S. EPA confirming this fact. In light of the October 25, 2013 letter, and the lack of correspondence from the MDEQ, Enbridge filed the dredging permit application for MP 28.25 on October 29, 2013.

3. Development of Final Dredge Polygons

Before initiating the poling data collection for the spring and summer of 2013, the dredge area polygons within Morrow Lake and the Morrow Lake Delta were supplied to Enbridge by the U.S. EPA and were determined from the “heavy” and/or “moderate” poling delineations from poling data collected during 2012. As more current poling data was collected during 2013, the dredge areas and dredge depths were modified to reflect current poling results and established the 2013 dredge polygons. This process complicated project planning and increased project completion timelines.

Per the approved 2013 SORA WP and during ongoing discussions with the U.S. EPA regarding refining the dredge areas, Enbridge finalized the dredge pad location and site design for the Morrow Lake and Morrow Lake Delta dredge locations. Based on the areas to be dredged within Morrow Lake and the Morrow Lake Delta, Enbridge identified a location suitable for the planned dredge operations. Upon access permission from the landowner, Enbridge began dredge pad site work to support the planned dredge activities. During a July 24, 2013 meeting, the U.S. EPA directed Enbridge to prepare a supplemental work plan to the 2013 SORA WP for determining dredge locations and depths. Enbridge submitted the supplemental work plan, *Sediment Dredge Depth and Area Determination Addendum to the 2013 Submerged Oil Removal and Assessment Work Plan* (Sediment Dredge Depth WP), to the U.S. EPA on July 29, 2013 for review and approval. The Sediment Dredge Depth WP was prepared to address modifications to the previously agreed upon dredge areas and depths within the U.S. EPA-ordered dredge areas (per the 2013 SORA WP). The Sediment Dredge Depth WP outlined a revised strategy for completing dredging at the Morrow Lake and Morrow Lake Delta dredge locations. On the day of issuance of the Sediment Dredge Depth WP, the U.S. EPA requested a collaborative meeting to finalize the work plan. During the meeting, which was held over 2 days (July 29 and July 30, 2013), the U.S. EPA and Enbridge agreed that dredge areas were calculated from the following datasets:

- Dredge areas developed by the U.S. EPA based on 2012 poling data,
- 2013 Spring Reassessment,

- Latest round of poling monitoring along the E 4.0 boom and curtain locations (Round 2), and
- Latest round of poling monitoring at sediment traps, (Round 2).

The resulting area was reviewed and small areas, not monitored during poling monitoring at the sediment traps or along the E 4.0 boom and curtain locations, were removed.

Also during the July 29 and July 30, 2013 meetings, the U.S. EPA and Enbridge agreed that dredge depths would be based on the 2013 Spring Reassessment and the most current rounds of sediment trap poling using the following hierarchy:

- 1) Depth to first encountered gravel layer. Dredging would not be conducted in areas where gravel was encountered at the river bed surface, or once gravel is encountered below soft sediment.
- 2) Two-push poling depth recorded during the 2013 river poling assessments.
- 3) Two-foot maximum. Dredging would not extend beyond two feet below the pre-dredge sediment surface.

The Sediment Dredge Depth WP required significant resources to modify the dredge polygons and tabulation of two-push poling data. On August 2, 2013, Enbridge submitted the U.S. EPA approved Sediment Dredge Depth WP.

Due to the significant changes requested by the U.S. EPA regarding dredge locations and depths, the Sediment Dredge Depth WP, with revisions to the polygon depth and locations, was also incorporated into a revised dredging permit application submitted to the MDEQ on August 7, 2013. Furthermore, in order to support completion of the dredging operations at the Morrow Lake and Morrow Lake Delta dredge locations, the U.S. EPA required completion of a Dredge Survey Supplement to the Sediment Dredge Depth and Area Determination Addendum. Enbridge completed the Dredge Survey Supplement to outline procedures for determining the accuracy of information used to confirm sediment removal depths and areas based on the calculated depths and areas. To complete the supplement and prepare an accurate revised dredge permit application for submittal to the MDEQ, Enbridge met with the dredging contractor over the course of several days to discuss dredge routes for the dredging equipment and to develop a dredge polygon survey verification outline. The U.S. EPA approved the Sediment Dredge Depth WP on August 21, 2013 and incorporated its comments provided to Enbridge during collaborative work plan meetings held on August 8 and August 13, 2013 and also from an August 8, 2013 electronic mail correspondence.

D. Conclusion

Enbridge remains committed to working with the U.S. EPA, MDEQ, and local residents. The proposal outlined above provides for completion of sediment removal in all areas covered by the 2013 SORA WP other than the Morrow Lake areas covered by Phase II of the proposed alternative.

While Enbridge attempted to identify alternatives that would allow completion of sediment removal in all areas covered by the 2013 SORA WP, its identification and review of possible alternatives leads to the conclusion that sediment removal cannot be completed in all areas by December 31, 2013.

Requiring dredging operations during icing conditions would result in significantly increased risks to project success and safety. In addition, any attempt to proceed is likely to run into additional legal delays based on STS' stated opposition to the use of any structures or equipment in Morrow Lake once ice begins to form.

Conversely, the offer by STS to lower the water behind the dam greatly enhances the attainment of the objective of the removal of the impacted sediment but can only be conducted during a specified period which is beyond the current deadline of the Order.

The alternative approach proposed in Phase II would be a collaborative effort with STS to monitor river flow conditions that would allow for the lowering of lake water levels to complete the dry excavation activities targeted in the southern portion of the delta. Given the constraints encountered in Comstock Township, Enbridge sees no other alternative than proceeding with the dry excavation method to comply with the intent of the U.S. EPA Order.

Our collaborative efforts have been successful with the progress made at Ceresco, Battle Creek Mill Ponds, MP 10.40, MP 10.50, and MP 21.50. In addition, MP 26.00, MP 36.10 and a second visit to MP 10.40 are scheduled to be completed by the end of the year. The unforeseen community resistance within Comstock Township is the only hurdle preventing us from meeting our objectives in Morrow Lake and the Morrow Lake Delta. Our alternative approach appears to be a winning combination for all parties involved.

In summary, Enbridge proposes to complete dredge activities in Morrow Lake and the Morrow Lake Delta beginning with Phase I in the fall of 2013. A proposed Project Schedule is attached. Containment would be reinstalled beginning once ice is off the river and after spring high flows. Phase II would commence after overwintering of turtles and furbearers, fish spawning, and the nesting period, and pursuant to the approved time frame by STS. Phase I is scheduled to be completed prior to the end of December 2013 with Phase II anticipated to be complete by the end of October 2014. Enbridge will continue to work cooperatively with the U.S. EPA and MDEQ staff to establish start and end dates once they become clearer. Enbridge accordingly respectfully requests that the U.S. EPA agree to extend the completion date of sediment removal required under the Administrative Order until October 31, 2014, which is the earliest time that Enbridge believes that sediment removal can be completed, for the reasons described above.

Please contact myself or Enbridge's Incident Commander John Sobojinski if you have any questions.

Sincerely,

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

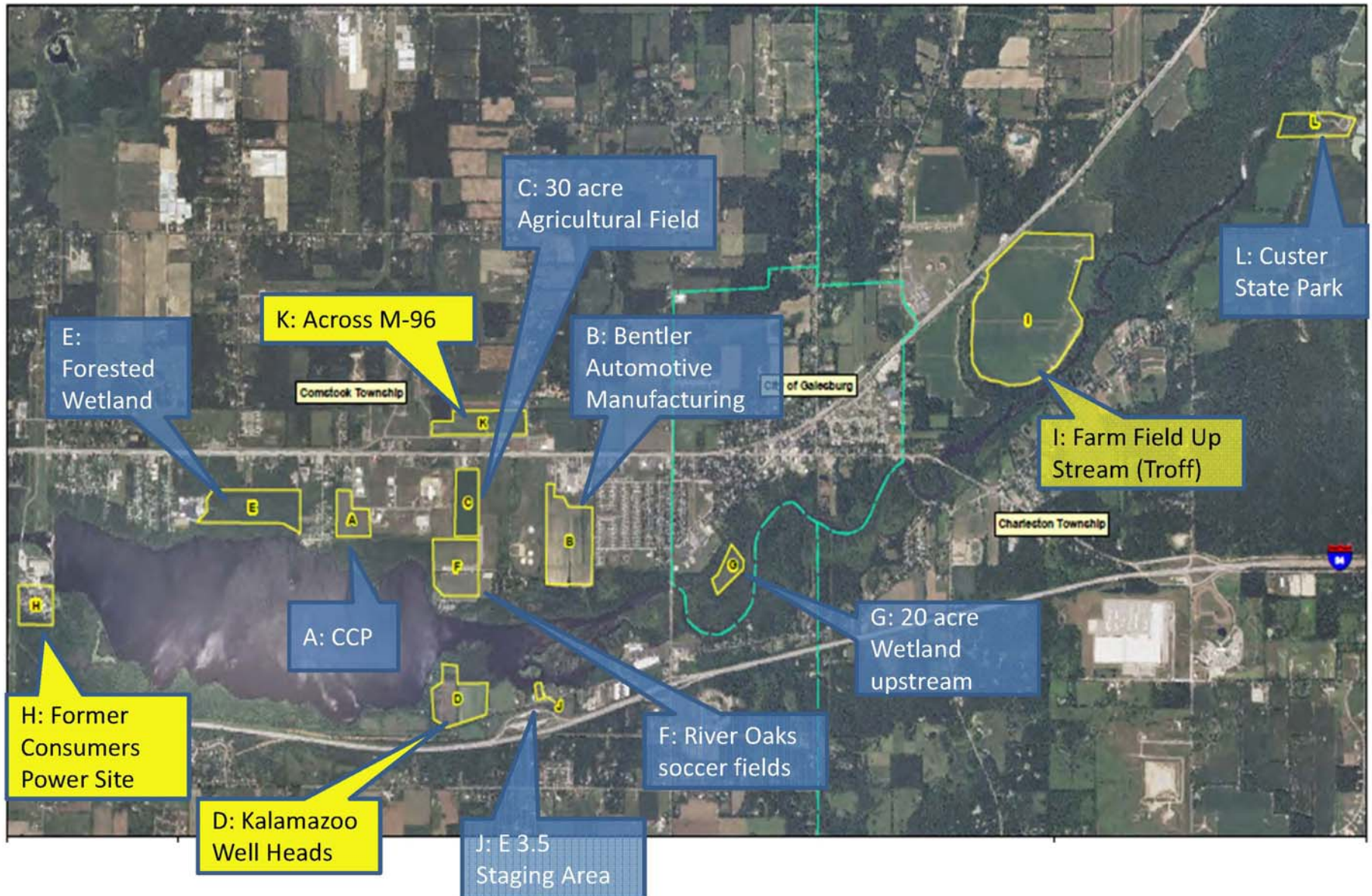


Richard Adams
Sr. Vice President, Operations

Enclosures: Communication Log-Alternative Dredge Pad Sites
STS HydroPower, Ltd. Letter
Project Schedule

Cc: John Sobojinski, Enbridge (via email only)
Michelle DeLong, MDEQ (via email only)

Communication Log – Alternative Dredge Pad Sites



Site ID	Title	Status
A	Comstock Commerce Park	Denied
B	Bentler Auto Manufacturing	Not Viable
C	Farm Field	Not Viable
D	Kalamazoo County Well Heads	Not Viable

Site ID	Title	Status
E	Wetland/forest	Not Viable
F	River Oaks Park Soccer Fields	Not Viable
G	Agricultural/wetland/forest	Not Viable
H	Consumers Energy	Not Viable

Site ID	Title	Status
I	Upstream Farm Field (Troff)	In Progress
J	E3.5 Staging Area	Not Viable as Dredge Pad
K	M96	In Progress
L	Custer State Park	In Progress

SITE B: Bentler Auto Manufacturing

A 60 acre parcel, which is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Proximity to the east, a larger residential neighborhood
- Proximity to the west, River Oaks Park baseball fields
- Historical contaminants of PCB's
- A foreign owned company with considerable processing time to achieve a lease agreement

Contact Log		
Contact	Date	Description
EPA	6/5/2013	EPA: Discussed potential use of Bentler site
EPA	6/25/2013	EPA: CCP site construction begins – no further inquiry into this site
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	6/4/2013	Land Services contact with Bentler to discuss potential dredge pad opportunity
Landowner	6/11/2013	Land Services discussed Bentler's executive management and legal reduced interest in leasing
Landowner	6/24/2013	Terra contacted Bentler on behalf of Enbridge to re-engage potential opportunities
Landowner	10/10/2013	Terra re-engaged and toured Bentler around Ceresco
Landowner	10/23/2013	Terra continued discussions and showed increased interest
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed challenges of nearby residential area
Township	8/29/2013	Discussion with township reps regarding alternative sites including Bentler
Township	10/22/2013	John Sobojski discussion with township supervisor.

STATUS:

Site is currently not considered viable because of zoning restrictions, proximity to residential and recreational area along with other concerns listed above.

SITE C: Farm Field

A 30 acre parcel, this is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Proximity to the east, River Oaks Park soccer fields
- Proximity to the west of Bell’s Brewery facility
- Multiple owned property
- Still within Comstock Township site plan approval process, with agricultural zoning to which would require change.

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	7/30/2013	Met with landowner to discuss amenability to lease this property for dredge pad use
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed challenges of nearby residential area

STATUS:

Site is currently not considered viable due to proximity to Bell’s Brewery and River Oaks park along with other considerations as listed above.

SITE D: Kalamazoo County Well Heads

A 35 acre split parcel, this is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- The property is a forested wetland area and would have greater constructability issues and geo technical impacts
- Construction work that could impact the well head is a risk
- Increased heavy traffic to a residential area.

Contact Log		
Contact	Date	Description
EPA	8/29/2013	Discussed this site with US EPA as a potential alternative during daily operations meeting.
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	6/26/2013	Met with STS representative to discuss ongoing activities, alternates and upcoming work
Landowner	8/14/2013	Met with STS representative to discuss ongoing township activities, alternates and upcoming work
Landowner	8/29/2013	Land Services and Christopher Haux met with STS representative to discuss dredge activities in which she indicated these parcels are available and that STS is amenable for further discussion of their use.
Landowner	9/23/2013	Land Services met with STS representative and Christopher Haux to update her and discuss dredge sites
Landowner	10/17/2013	Conference call with STS representative, Land Services and Christopher Haux to discuss methodology and dredge plans
Landowner	10/28/2013	Conference call with STS representative, Land Services and John Sobojinski to discuss methodology and dredge plans
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed challenges of proximity to well heads. Also discussed opportunities of use of the MDOT rest stop for staging.
MDEQ	10/15/2013	Meeting with MDEQ and City of Kalamazoo water treatment in which a tour of the Ceresco dredge pad and the Kalamazoo well heads site were conducted. Discussions of engineering controls needed and proximity.
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not being further developed due to timing to construct along with other considerations as listed above.

SITE E: Wetland/forest

A 60 acre parcel, this is of adequate size and proximity upstream to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- The property is a forested wetland that would need to be cleared and would have greater constructability issues
- The property has no infrastructure to allow access to a roadway
- Increased heavy traffic through a residential area
- Zoned agricultural / Recreational

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/29/2013	Land Services met with STS representative and Christopher Haux to update her and discuss dredge sites
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed impacts to the forested wetland and unlikelihood of MDEQ permitting this activity
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not considered viable because of MDEQ's unlikelihood to permit the activity along with other considerations as listed above.

SITE F: River Oaks Park Soccer Fields

A 30 acre parcel, this is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Use of this property would close the use of these fields which are heavily used in the fall of the year
- Considerable public impact
- Increased traffic through the park

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/26/2013	Land Services met with Christopher Haux, outside legal counsel, and Kalamazoo County Parks representatives at Parks to discuss potential for park use areas and methodology. County wants to help us.
Landowner	9/10/2013	Infrastructure development (parking lot)
Landowner	10/23/2013	Land Services met with Kalamazoo County Parks representative to discuss potential use of County Parks for dredge / staging site and update on work plans
Landowner	10/24/2013	Land Services met with Kalamazoo County Parks representatives to further discuss methodology and timeframe
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed community impacts
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not being further developed as a hydraulic dredge pad alternative due to its proximity to Bell’s Brewery, Agricultural/Recreational zoning, community impacts along with other considerations as listed above.

SITE G: Agricultural/wetland/forest

A 20 acre parcel, this is of adequate size and proximity upstream to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- The property is a forested wetland area and would have greater constructability issues,
- The property is located adjacent to a high school, and
- Increased heavy traffic through a school area.

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/29/2013	Land Services met with STS representative and Christopher Haux to update her and discuss dredge sites
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed impacts to the forested wetland and unlikelihood of MDEQ permitting this activity
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not considered viable because of MDEQ's unlikelihood to permit the activity along with other considerations as listed above.

SITE H: Consumers Energy

This is a 30 acre parcel, with multiple owners to the far west end of Morrow Lake. It is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- The property has multiple sources of historic contaminants on the property. These liabilities would be assumed by Enbridge and cannot waived, nor are adequate means available to barrier against this risk
- Multiple owners of the property
- Access to the Site is through STS hydropower property and bridge which is unlikely to allow that impact to their operation and risk to their infrastructure
- Full closure of Morrow Lake.

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites including a feasibility review of this site.
EPA	9/9/2013	EPA: Tricia Edwards discussion with Christopher Haux regarding feasibility of the site and ownership. We were informed of legal proceedings and advised not to intervene at this time.
EPA	11/4/2013	EPA: Jeff Kimble property legal proceedings ending soon. Contact information provided.
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/26/2013	Land Services met with Christopher Haux and outside legal counsel to discuss and tour alternate access sites to this property.
Landowner	8/29/2013	Land Services met with STS representative and Christopher Haux to discuss using STS property to access this site.
MDEQ	9/4/2013	MDEQ: Alternate site review – discussion of MDEQ jurisdiction.
Township	8/29/2013	Discussion with township reps regarding alternative sites including this site.
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not being further developed due to pending legal matters along with other considerations as listed above.

SITE I: Upstream Farm Field (Troff)

This is a 120 acre parcel, approximately five miles upstream from Morrow Lake. It is of adequate size and feasible proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Logistical constraints of the distance to transport material
- River closure
- Challenges with learning protocols of new township
- Historic contaminants

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites.
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/26/2013	Initial contact of amenability to lease this property for dredge pad construction and use
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed river closure.

STATUS:

Site is currently not being developed because of logistical constraints along with other considerations as listed above.

SITE J: E3.5 Staging Area

This is a 2.5 acre parcel, adjacent to Morrow Lake Delta. It is of adequate size and proximity to Morrow Lake for staging and transport of debris and equipment.

The following items are of concern:

- Size is insufficient for dredge pad area
- Township limitations

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites.
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed this site in conjunction with Site D (well heads)
Other	6/18/2013	Adjacent landowner mitigations
Township	8/29/2013	Planning Commission approval for staging and debris removal

STATUS:

Site is currently not considered viable for dredge pad construction due to size along with other considerations as listed above. However, it is being further developed for support operations.

SITE K: M96

This is a 35 acre parcel, across M96 from River Oaks Park. It is of adequate size and proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Crossing agreement for highway
- Crossing agreement for railroad
- Zoned agricultural

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites.
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	7/30/2013	Met with landowners of CCP site as to the ongoing township proceedings. In discussion they provided this property as a potential alternate.
Landowner	8/27/2013	Met with landowners of CCP site as to the ongoing restoration and township proceedings. This site was discussed as an alternate and its community / zoning impacts along with highway and rail limitations.
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed this site in conjunction with Site D (well heads)
Township	10/22/2013	John Sobojinski discussion with township supervisor.

STATUS:

Site is currently not considered viable at this time due to highway and rail limitations along with other considerations as listed above.

SITE L: Custer State Park

This is a 60 acre parcel, approximately five miles upstream from Morrow Lake. It is of adequate size and feasible proximity to Morrow Lake to bring dredging materials and to discharge water.

The following items are of concern:

- Logistical constraints of the distance to transport material
- River closure
- Challenges with learning protocols of new township
- State and Federal grant for operation, deed restrictions and National Park Services agreement
- Historic contaminants

Contact Log		
Contact	Date	Description
EPA	9/4/2013	EPA: Jeff Kimble contact by Christopher Haux to discuss alternate sites.
EPA / MDEQ	9/19/2013	Presentation of alternative dredge pad sites and methodology
Landowner	8/1/2013	Called and spoke to Ft Custer Rec Area Representative to discuss potential use of parks for dredge pad - would need National Park Svc agreement.
MDEQ	9/4/2013	MDEQ: Alternate site review – discussed river closure.

STATUS:

Site is currently not being developed because of logistical constraints along with other considerations as listed above.

STS HydroPower, Ltd. Letter



STS HydroPower, Ltd.

April 10, 2013

Ms. Michelle DeLong
MDEQ-WRD
7953 Adobe Road
Kalamazoo, MI 49009

RE: Enbridge Proposed Kalamazoo River Mediation Activities

Dear Ms. DeLong:

Enbridge has requested permission to install anchor/surface boom/subsurface curtain and buoy installations for the east end of Morrow Lake for 2013 as a continuation of use and clean-up activities from last year.

In general we do not object to the proposed buoy/boom/curtain installations, however, all installations shall be removed prior to ice development on the impoundment (from Morrow Dam to 35th Street) when winter weather arrives at the end of the year.

The undersigned gives permission to Enbridge Energy Limited Partnership (Enbridge) to apply for a Michigan Department of Environmental Quality (MDEQ) permit for placement of containment booms, anchors and buoys within our apparent riparian interest area and on our property on the Kalamazoo River and Morrow Lake as noted on the email attachments and to proceed with the permitted activity in those locations when the permit is issued.

Please contact me if you have any questions or need additional information.

Sincerely,

STS HYDROPOWER, LTD.

Janine Klinge
Project Engineer

cc: Mr. John Sobojinski, Enbridge
Mr. Chuck Ahlrichs

Project Schedule

Morrow Lake/Morrow Lake Delta Project Schedule
 Enbridge Line 6B MP 608 Marshall, MI Pipeline Release
 Enbridge Energy, Limited Partnership

ID	Task Name	2014													
		Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov
1	Phase I Activities														
2	E4 Removal														
3	Sediment Removal (Neck Area)														
4	Spring 2014 Reassessment														
5	Reassessment														
6	Phase II Activities														
7	Permitting, Site Plan Reviews, Lo														
8	Barriers and Dewater														
9	Install Infrastructure														
10	Dry Excavate Sediment														
11	Transportation and Disposal														