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October 18, 2022

**VIA EMAIL**

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Karen Peaceman  
Matthew Russo  
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**Re: *United States v. Enbridge Energy, Limited Partnership, et al.*, Civ. No. 1:16-cv-00914, Consent Decree – Request for Partial Termination**

Dear Ms. Garypie, Ms. Peaceman, Mr. Russo, and Ms. Welles:

This letter is submitted on behalf of the Enbridge defendants to request partial termination of the Consent Decree pursuant to Paragraph 204 of the Seventh Modification, which was lodged for court approval on October 12, 2022. Please find enclosed a Partial Termination Report (“PTR”) that includes the information specified in Subparagraph 204.b of the Seventh Modification. That PTR, together with the information incorporated therein by reference, demonstrates that Enbridge has implemented all obligations of the Consent Decree that are subject to this partial termination request, and has maintained substantial compliance with all such obligations for at least the last 12 continuous months occurring from the date of this partial termination request.

Please further note that Enbridge will be submitting in the near future a “mini”-Semi Annual Report that will provide the United States with all information necessary to verify Enbridge’s compliance with the Consent Decree obligations subject to partial termination from the date covered by SAR10 to the date of this partial termination request.


Finally, in accordance with Paragraph 203.c, Enbridge remains responsible for implementation of all obligations under the Consent Decree until the United States approves this

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partial termination request in accordance with Subparagraph 204.d or 204.e. Enbridge will also satisfy all obligations under Paragraph 203.c until the United States acts on this partial termination request.

Sincerely,



William T. Hassler

Enclosure

cc: Steven Willey, U.S. Department of Justice  
Joe Warren, U.S. Department of Justice  
Thomas Van Horn, U.S. Coast Guard  
[eesdcopy.enrd@usdoj.gov](mailto:eesdcopy.enrd@usdoj.gov) (re: DJ # 90-5-1-1-10099)