
From: Amy Schaffer[SMTP:AMYANNSCHAFFER@GMAIL.COM]
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To: PUC Docket Filings
Subject: Existing Docket - HP14-001
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Dear South Dakota Public Utility Commission,

Due to my inability to be present at the recent hearing, I would like to submit written comments as a formal intervenor. Specifically, I would like to comment on whether TransCanada still meets the conditions of the project.

Demand for the Facility

Under condition 14, there is no longer a growing demand by refineries and markets in the United States, due to the development of the Bakken formation. This is most evident by the lower fuel prices consumers are paying at the pump in comparison to 2010. The abovementioned stands true for conditions 24 and 25 as well. In regard to condition 25, consumers are moving toward more renewable and cleaner energies, therefore there is no longer a need for mass quantities of oil; this is further supported by more automobiles moving toward electric power and the use of biofuels. The demand for petroleum products will therefore continue to decrease. Condition 27 is no longer applicable, as it has been stated over and over with the development of the Bakken formation, the U.S. has more oil that they will ever need. Furthermore, instead of increasing the use of oil we should instead move to the use of renewable energies, thus this is a mute point. As for condition 28, movement of tarsands by pipeline is not reliable nor safe this is evident by the recent spills that still have not been cleaned up, resulting in permanent damage to the economies in these areas in addition to the environmental impacts. Lastly, in regard to condition 29, this is TransCanada's problem, whereby they have moved forward and committed to long-term contracts without the proper permits. This should not be a factor in the granting of the permit to TransCanada by the South Dakota PUC, instead public safety and preservation of our natural resources that sustain all life should be the biggest factor.

Environmental

There are significant environmental risks associated with conditions 30-59. These risks deserve further analysis, detailing mitigation methods to lessen impacts to the vulnerable soils and streams, rivers, and lakes. Because the pipeline will cross porous permeable soils, these areas also easily erode which will then result in blowouts, which could then affect the reclamation of the land further leading to more blowouts. As for condition 42, it is worrisome that the pipeline will be buried at such a depth that pinholes leaks would be undetected. As seen with Keystone I, the pipeline will corrode and pinhole leaks are inevitable. These pinhole leaks could be extremely catastrophic for livestock and human health if they go undetected. Condition 44 is completely false, the leak percentage on Keystone I was significantly higher. In regard to condition 46, and the route crossing the Sandhills, though impacts to the Sandhills in South Dakota are smaller due to fewer miles being crossed, these risks are much larger in Nebraska where the Sandhills

and Ogallala Aquifer are being crossed by many more miles of the pipeline. Therefore, the entry point into the state of Nebraska should be moved to avoid this vulnerable area. Citing the pipeline next to Keystone I would eliminate this high risk, and eliminate the pipeline crossing areas of porous permeable soils with a shallow water table and passing over the Ogallala Aquifer. Condition 53, supports this position naming the area as being “vulnerable” and requiring additional vigilance. Condition 49, is also flawed as there is no spill plan for cleaning up tarsands. Additionally, benzene in tablespoon amounts is extremely toxic to the health of people as well as livestock. As for condition 57, if the pipeline has a puncture resistance of 51 tons, why is it already corroding on Keystone I?

Design and Construction

In regard to conditions 65, 66, and 67 these have been proven inadequate by testimony from Evan Vokes. Additionally, poor welds can also lead to pinhole leaks, and the leak detection system will not detect these leaks. The hydrostatic testing is done once the pipeline is in the ground, and once again the leak detection system will only detect larger percentages, it cannot detect pinhole leaks caused by corrosion or improper welds. As for condition 69, the cathodic protection system failed on Keystone I. This also applies to condition 70; this condition is not working to reduce internal corrosion. Therefore, these conditions are currently failing; the evidence can be seen on Keystone I.

Operation and Maintenance

As previously stated, the leak detection system that TransCanada uses does not detect pinhole leaks; it only detects significant changes in volume. Local emergency staff has not been trained on how to handle a tarsands spill nor do they have the proper gear to clean up a tarsands spill.

Alternative Routes

The entry point of the pipeline route into Nebraska needs moved to avoid the environmentally sensitive Sandhills and the Ogallala Aquifer. The pipeline should be cited next to Keystone I. Though the impacts to these areas in South Dakota are being crossed by fewer miles, it is still a very vulnerable area which would require “additional vigilance.” Let’s eliminate this risk to this environmentally sensitive area by routing the pipeline around these areas in both South Dakota and Nebraska.

Socio-Economic Factors

In regard to condition 108, the evidence is in Keystone I, the taxes amount to half of TransCanada’s predictions. As for condition 109, the jobs are temporary; there are only a few permanent jobs unless there is a spill. The permanent jobs most at risk are those on the route, the farmers and ranchers and your food supply.

In summary, as supported by the conditions aforementioned, the South Dakota Public Utility Commission should not renew the permit for TransCanada. There are issues with the route crossing porous permeable soils, Ogallala Aquifer, rivers, and streams. Furthermore, from evidence obtained from Keystone I, the South Dakota Public Utility Commission should have not faith in TransCanada’s leak detection system. Lastly, the same need for the pipeline no longer exists as it did in 2010. Because of these risks associated with TransCanada not meeting these conditions, I ask the South Dakota Public Utility Commission to deny granting TransCanada the renewal of their permit.

Sincerely,

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