



December 5, 2025

Line 5 Tunnel EIS  
16501 Shady Grove Road  
P.O. Box 10178  
Gaithersburg, MD 20898

**Re: Line 5 Supplemental Draft Environmental Impact Statement**

Dear USACE Detroit District Staff,

Thank you for the opportunity to comment on the Line 5 Supplemental Draft Environmental Impact Statement on the horizontal directional drilling (HDD) Installation Alternative. FracTracker Alliance is an environmental nonprofit that analyzes and communicates the risks associated with oil, gas, and petrochemical development. Since 2010, we have provided data, mapping, and analysis to frontline communities, grassroots organizations, and decision-makers across the United States. This work has made us a leading source of information related to the social and environmental impacts of these industries.

We submit these comments to oppose the HDD Installation Alternative. Based on our expertise and ongoing research on pipeline risks nationwide, this alternative poses unacceptable risks to Michigan's waters, environment, and residents, while offering negligible public benefits. We urge the U.S. Army Corps of Engineers (USACE) to reject this alternative.

While HDD is presented as a technologically feasible substitute for the proposed tunnel, the Supplemental Draft EIS significantly underestimates the environmental, cultural, geologic, and public-safety risks associated with drilling beneath the Straits of Mackinac. These risks are compounded by Enbridge's long, well-documented record of regulatory violations and spill histories.

**1. Industry-wide HDD risks and documented failures.**

The Supplemental Draft EIS acknowledges the presence of karst conditions under the Straits, including voids, dissolution features, and fractured bedrock (USACE, 2025). HDD is widely recognized as high-risk in karst environments because drilling mud losses (frac-outs) can rapidly travel through fractures and discharge into groundwater, wetlands, or open water. The EIS minimizes these risks by relying on conceptual models rather than site-specific geotechnical surveys, despite explicitly acknowledging that such data is "incomplete or unavailable".

Across the country, HDD projects in sensitive hydrogeologic settings have repeatedly caused uncontrolled drilling fluid releases. The Falcon Pipeline project, [researched by FracTracker in 2024](#), provides a clear example: Shell Pipeline subcontractors were criminally charged after frac-outs contaminated wetlands and stream systems, and after falsified documents hid drilling losses from regulators (Jones, 2024). Similarly, the Mariner East Pipeline, [researched by FracTracker in 2017](#), released more than 202,000 gallons of drilling fluid during at least 90 documented "inadvertent return" events (Jalbert, 2017). These occurred in wetlands,



streams, carbonate bedrock, and private drinking-water zones. Many releases contaminated wells or surface waters and required emergency response. This pattern demonstrates that HDD failures are not hypothetical; they are systemic. Without evaluating the contractor who will complete the HDD, the supplemental EIS appears inconsistent with NEPA's requirement to assess reasonably foreseeable impacts, as contractor performance could be a major predictor of inadvertent returns (IRs) and frac-outs.

Given the hydrologic interconnection between fractured bedrock and the Great Lakes, a frac-out under the Straits could release thousands of gallons of chemical-laden drilling fluids directly into Lake Michigan and Lake Huron, as well as along the shores. The EIS fails to provide evidence that risk is manageable or that emergency response is feasible in the submerged, pressurized environment beneath two Great Lakes.

## **2. The EIS does not meaningfully address drilling fluid toxicity or Enbridge's historic failure to disclose such information**

The Supplemental Draft EIS states that drilling fluids will follow standard Material Safety Data Sheets and best practices, yet does not analyze the chemical additives historically used in HDD operations, meaning drilling fluids may be considered under one umbrella. Drilling fluids contain chemicals that may be harmful to human and environmental health and therefore warrant detailed, additive-specific analysis. Additionally, the lack of chemical additive disclosure is especially concerning since EGLE previously had to issue correction requests to Enbridge for failing to disclose Water Treatment Additives for the tunnel project. The lack of additive analysis in the Supplemental Draft EIS is consistent with a documented pattern of Enbridge withholding chemical information.

Similarly, FracTracker's analysis of the Falcon Ethane Pipeline System, later the subject of a criminal investigation, found that drilling logs were falsified and waste-disposal records were manipulated. The criminal charges brought in that case underscore a broader, well-documented pattern of noncompliance and misconduct across the pipeline industry, particularly in HDD construction. This pattern raises legitimate concerns about Enbridge's ability to comply with monitoring, drilling-fluid reporting, or spill-notification requirements during HDD operations under the Straits. Given Enbridge's extensive federal record of violations associated with Line 5 and Line 6B, the company has not earned regulatory trust.

## **3. The EIS fails to adequately consider tribal treaty rights, cultural resources, and Indigenous ecological knowledge**

The Straits of Mackinac are a region of immense cultural, spiritual, and historical significance to Tribal Nations, as has been mentioned at every commenting period around the pipeline. While the Supplemental Draft EIS cites existing treaty-rights discussions from the earlier EIS, it does not meaningfully evaluate how HDD construction, geologic risk, or potential frac-outs would impair Tribal fishing rights or cultural landscapes. FracTracker's Falcon Pipeline analysis demonstrated that HDD corridors can permanently alter groundwater flow and degrade culturally significant wetlands. The EIS's reliance on incomplete data makes its conclusions about minimal cultural impacts scientifically unsupported and legally inadequate. Additionally, previous discussions of treaty rights failed to adequately address the concerns of tribal citizens, leading groups to withdraw from coordination with USACE. Any project that runs through the Straits of Mackinac fundamentally conflicts with well-documented tribal concerns (Native American Rights Fund, 2025).



#### **4. HDD does not mitigate long-term spill risk**

Enbridge frames HDD as a reduction in risk, yet the Supplemental Draft EIS acknowledges that the existing Line 5 would continue operating until HDD or tunnel installation is complete, extending the life of the 71-year-old pipeline in the Straits. HDD merely buries a new high-pressure pipeline in bedrock, making future spills harder to detect, access, and repair. The 2010 Line 6B Kalamazoo disaster demonstrated that Enbridge repeatedly misinterprets or ignores leak alarms, leading to catastrophic outcomes. A similar failure beneath the Straits would be vastly more difficult to address, whether the leak occurred in an HDD-constructed pipeline or a tunnel.

#### **Conclusion**

Given the severe risks, incomplete data, and Enbridge's history of noncompliance, the Supplemental Draft EIS does not demonstrate that HDD under the Straits of Mackinac can be conducted safely, legally, or in the public interest, as is the case with the Tunnel application as well.

#### **We respectfully urge the U.S. Army Corps of Engineers to:**

1. Reject the HDD Installation Alternative as infeasible and environmentally unacceptable.
2. Require full, independent geotechnical, hydrological, and cultural-resource surveys before any further NEPA steps.
3. Reject the tunnel proposal in its entirety.

Thank you for your time and for considering these comments. Please reach out to Gwen Klenke at [klenke@fractracker.org](mailto:klenke@fractracker.org) if you have any questions.

Sincerely,

**FracTracker Alliance**

216 Franklin St, Ste 400

Johnstown, PA 15901

<https://www.fractracker.org/>



# FracTracker Alliance

## Sources

- Jalbert, K. (2017, July 26). *Mariner East 2 drilling fluid spills – Updated map and analysis*. FracTracker Alliance. <https://www.fractracker.org/2017/07/me2-drilling-fluid-spills/>
- Jones, K. (2024, June 5). *Falcon Pipeline criminal charges explained*. FracTracker Alliance. <https://www.fractracker.org/2024/06/falcon-pipeline-criminal-charges-explained/>
- Native American Rights Fund. (2025, June 10). *Tribes unite in opposition to the Line 5 pipeline*. <https://narf.org/resources/tribes-oppose-line-5-pipeline/>
- U.S. Army Corps of Engineers. (2025). *Line 5 Tunnel Project: Supplemental Draft Environmental Impact Statement, Horizontal Directional Drilling Installation Alternative*. Retrieved from file:///mnt/data/2025/11/Line-5-Tunnel-Project-Supplemental-Draft-EIS\_Horizontal-Directional-Drilling-Installation-Alternative\_508\_Updated.pdf