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Subject: Supplemental Comments on Enbridge's HDD Alternative Review - Line 5 Tunnel Project
Supplemental Draft EIS LRE-2010-00463-56-A19

Dear Ms. Otanez,

The National Wildlife Federation and Great Lakes Business Network are submitting these supplemental comments regarding the proposed Horizontal Directional Drill (HDD) alternative under review. After careful examination of the materials provided, we have significant concerns about the adequacy of the information presented and the overall necessity and feasibility of the HDD proposal.

1. Lack of Sufficient Technical Information for Meaningful Review

The supplemental EIS fails to provide the detailed technical data necessary for a rigorous, meaningful review of the proposed HDD. Critical information regarding:

- Geotechnical profiles along the exact proposed drill path,
- Pore pressure and fracture gradient analyses,
- Detailed drilling fluid plans and containment strategies,
- Frack-out risk assessment and mitigation plans specific to the site geology,
- Contingency and response plans for inadvertent returns or drilling fluid releases into sensitive environments, are either absent or presented in a generalized, non-site-specific manner.

Without this essential engineering and geological data, neither the USACE nor the public can adequately assess the risks, feasibility, or potential impacts of this alternative. The submission, as it stands, does not meet the standard for informed National Environmental Policy Act, 42 USCS §§ 4321 et seq (NEPA) analysis or public engagement.

2. HDD is Not a Necessary Alternative

As thoroughly documented in the PLG Consulting, Likely Market Responses to a Line 5 Shutdown report, there are a suite of potential market adjustments that could be made in the event of a planned and orderly shutdown of Enbridge's Line 5 pipeline. As outlined in the attached filings, and in previous comments around the proposed Tunnel alternative, USACE should fully consider a required shutdown as an alternative

3. USACE Has Previously Concluded HDD is Not Feasible

We note that the USACE, in prior evaluations for this project, has already concluded that an HDD of the proposed length and through the specific geology of the drilling zone was not feasible. This determination was based on:

- The excessive length of the proposed drill,
- The technical challenges of drilling through the complex, unstable geology identified in the area (including conditions prone to fluid migration, lost circulation, and borehole collapse).

The current proposal does not appear to substantively address these previously identified,fundamental feasibility concerns. Without new, conclusive geotechnical data proving otherwise, the prior Corps determination should stand.

4. Unacceptable Environmental Risks from Construction and Frack-Outs

The proposal grossly underestimates the environmental footprint and the extreme risk of inadvertent returns (frack-outs).

- Construction Footprint: HDD sites require significant land disturbance for entry/exit pits, slurry containment, and equipment staging, impacting wetlands and uplands.
- Catastrophic Frack-Out Risk: Enbridge's own recent history on the Line 3 replacement project is instructive. There, the company experienced over 48 million gallons of drilling fluid releases (frack-outs) from HDD operations in less complex geology, despite promises of safe execution.

These incidents resulted in significant environmental damage, including contamination of wetlands and waterways. Given the even more complex and sensitive geology proposed here, the risk of similar, or worse, failures is unacceptably high. The supplemental EIS lacks a credible plan to prevent or adequately respond to such events.

5. Inherent Risks of Buried HDD Pipelines: Inaccessibility, Uncontainable Leaks, and Prolonged Threat to the Great Lakes

The proposed HDD alternative introduces catastrophic long-term risks that extend far beyond construction-phase frack-outs. A pipeline segment buried deep underground via HDD creates a permanent vulnerability that is nearly impossible to monitor or mitigate, placing the Great Lakes ecosystem in grave jeopardy.

- Inaccessibility for Inspection and Maintenance: Unlike pipelines in accessible corridors, an HDD segment is entombed deep below the surface, beyond the reach of routine direct inspection, cathodic protection verification, and geotechnical monitoring. Critical tools like Direct Assessment or even visual inspection of the pipe exterior are rendered impossible. This creates a "black box" scenario where corrosion, seam stress, or manufacturing defects can progress undetected until failure.
- Inability to Locate, Access, and Contain a Leak: In the event of a leak, the technical challenges would be insurmountable for a timely response.

1. Detection & Location: Leak detection systems for liquids pipelines are notoriously imprecise over short distances and small volumes. Pinpointing a leak in a deep, buried HDD segment could take weeks or months, as the product migrates through geological layers.

2. Access & Containment: Shutting valves at distant intervals would stop flow but would not contain the product already in the HDD segment, which would continue to drain. Excavating to access a leak is not possible for most of the length. Effective containment or capping is not feasible.

- Long Distance Without Valves & Uncontrollable Drainage: HDD segments, by design, are long distances without valve placements. This means a rupture could drain the entire contents of the

isolated pipeline segment—potentially millions of gallons—into the environment. There is no mechanism to stop this drainage.

Conclusion: A Direct and Unacceptable Threat to the Great Lakes
This combination of factors - an inaccessible, unmonitorable pipeline prone to undetected failure, with no means of timely leak location, access, or containment - creates a scenario for uncontrollable long-term devastation. Any expansion or extension of Line 5 is not in the public interest; there are alternatives to Line 5.

A leak from an HDD segment would not be a "spill" in the conventional sense. It would be a continuous, sub-surface infusion of hydrocarbons into the geological framework that hydrologically connects to the Great Lakes. The contamination would be:

- Prolonged: Leaking for months or years before being detected, and continuing to leach thereafter.
- Unrecoverable: The product, dispersed in groundwater and bedrock, could not be cleaned up with any known technology.
- Catastrophic in Scale: Impacting the drinking water for 40 million people.
- Ecologically Devastating: Destroying wildlife habitats, spawning grounds, and benthic communities through persistent toxic contamination.
- Economically Ruinous: A spill in this location could cripple the $7 trillion Great Lakes economy that depends on clean water for tourism, recreation, commercial fishing, and agriculture.

Given Enbridge’s history with the Line 6B spill in the Kalamazoo River and the chronic HDD failures on Line 3, trusting them to manage this unconscionable risk is not an option. The USACE must recognize that an HDD pipeline here is not an engineering solution, but a permanent, ticking liability placed at the heart of our continent's most vital freshwater system. This risk alone is sufficient grounds for rejecting the HDD alternative.

Conclusion and Request
For the reasons stated above, we strongly urge the USACE to:

- Reject the current HDD alternative proposal as inadequately documented for proper review.
- Uphold its prior finding that an HDD at this location is not feasible due to length and geological constraints.
- Acknowledge that the PLG Alternatives Report demonstrates this HDD and Tunnel are unnecessary.
- Recognize that the immense risk of frack-outs, demonstrated by Enbridge’s own poor performance record on Line 3, presents an unacceptable danger to the environment that cannot be mitigated by unsubstantiated promises.

The proposed HDD alternative is technically deficient, previously deemed unfeasible, unnecessary, and poses an extreme and demonstrated risk to the environment. It should be removed from consideration.

Respectfully submitted by Beth Wallace, Great Lakes climate and energy director for the National Wildlife Federation.