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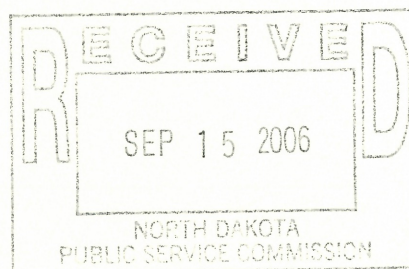
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September 15, 2006

Hand Delivered

Ms. Illona A. Jeffcoat-Sacco
Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Ave., Dept. 408
Bismarck, ND 58505-0480



Dear Ms. Jeffcoat-Sacco:

In re: Enbridge Pipelines (North Dakota) LLC
Case No. PU-06-330
Trenton to Beaver Lodge Pipeline
Williams County Siting Application
Our File No. 120-27894

Enclosed for filing, please find:

1. Eleven copies of Exhibit No. 7 as requested by the Commission at the hearing regarding the abandoned mine. Enbridge proposes to conduct test drilling to determine the extent of the mine.

In addition, pursuant to the request of the Commission staff, we wish to advise that the final archeology report is anticipated to be filed with the North Dakota State Historic Preservation Office today.

Please call should you have any questions.

Very truly yours,

BRIAN R. BJELLA

bw
Enc.

28 PU-06-330 Filed: 9/15/2006 Pages: 12
Investigation of Suspected Mine in Section 4 Pherrin
Township, Exhibit No. 7

Fleck Mather & Strutz, LTD.

**ENBRIDGE PIPELINES (NORTH DAKOTA) LLC
TRENTON TO BEAVER LODGE LINE LOOP**

**Investigation of Suspected Mine in Section 4 of Pherrin Township
September 12, 2006**

Enbridge Pipelines (North Dakota) LLC ("Enbridge") is presently evaluating a project to expand a portion of its pipeline system in Williams County, North Dakota. The proposed expansion, known as the Trenton to Beaver Lodge Line Loop, would involve constructing a new underground crude oil pipeline adjacent to a portion of its existing underground crude oil pipeline. The new pipeline would be installed approximately 20 feet north and/or west of the existing pipeline, except at locations where crossovers of the existing pipeline or minor route variations were requested by landowners, are necessary to improve constructability, or would aid in minimizing impacts on sensitive resources.

Enbridge conducted an environmental review of the proposed Trenton to Beaver Lodge Line Loop as part of its application for a Certificate of Corridor Compatibility and Route Permit with the North Dakota Public Service Commission. As part of that review, Enbridge identified sinkholes as a potential geologic hazard in the vicinity of the proposed pipeline. Sinkholes are considered a geologic hazard in parts of North Dakota where lignite (coal) mining occurred beneath soft sediments. Many of the early coal mines in the state were underground where the coal seams were not very deep. Very few of the mined areas have any rock strata to provide solid roofing for the mines, and the soil over most of the older mines does not add stability to the overburden. Roads, homes, and sometimes entire towns were constructed over abandoned coal mines, so when subsidence occurs, some degree of damage can occur. Generally, mine collapse is evident by a relatively small surface opening and the hole belling out to become wide and deep. Holes at the surface range from just a few feet in diameter up to 40 feet. In a few instances, holes at the surface have reached up to 200 feet.

Records of lignite mining in North Dakota go back to 1873. By 1900, there were at least 73 mines. Many of the mines were small, but some were large with underground workings extending thousands of feet. By the early 1920s, there were approximately 250 mines. About half were underground and half were surface strip mines. Advances

in mining technology gradually increased the profitability of surface mining, and the last underground mine in North Dakota ceased operation in 1966.

There are no active coal mines in Williams County. However, one historical, abandoned coal mine is thought to be located within one-half mile of the proposed pipeline. The exact location of the abandon mine is not known except that is within the northeast quarter of Section 4 in Pherrin Township. Neither the state nor the county have records on the mine, which might provide basic information such as the depth, direction, and distance of underground mining.

Initially, Enbridge concluded that the risk of sinkhole development in the vicinity of the proposed project was low because the area had not experienced sinkhole development to date. However, the Public Service Commission requested that Enbridge conduct additional studies to verify the presence or absence of sinkhole risk in this area, particularly because of the suspected mine nearby.

Factors that indicate a low risk of sinkhole development include the fact neither County Road 8 (previously U.S. Highway 2) nor the existing Enbridge pipeline have experienced obvious problems due to sinkhole development. Mineral rights for coal mining were typically limited to quarter sections, which suggest that if a mine were present in northeast quarter of Section 4, it probably would not have extended across the section lines into the area of the proposed pipeline. An interview with the landowner where the suspected mine is thought to exist, Mr. Charles Robinson, indicated that he has no knowledge of a mine on his property. He also stated there was a lease for lignite mining on the property more than 20 years ago, but that the property was never mined and the lease expired.

On September 8, 2006, Bruce Beechie of the Public Service Commission's Abandon Mine Lands Division conducted a field investigation of the northeast quarter of Section 4 in Pherrin Township and areas immediately adjacent. The intent of the investigation was to try and determine the existence of the suspected mines. Mr. Beechie identified a double mine entrance in the southwest quarter of the northeast quarter of Section 4 in Pherrin Township (see attached photos 1, 2 and 3 and maps 1 and 2). The mine entrance is at adjacent to a stock dam, and water from the coal seam/coal mine is likely

the source water for the stock dam. Mine collapse is visible from the entrance up to the top of the hill. Coal slack is apparent down gradient of the entrance, which indicates a possible tipple site and/or load out facility typically associated with coal mines.

The mine entrance trends in a north-northeasterly direction, and is thought to be a drift entrance, meaning that it is at the same elevation as the coal seam and extends horizontally into the hillside. There is a possibility that the entrance is a slope or shaft entrance, which means that it extends to a coal seam at a lower elevation. The coal seam in this area is known to be 7 to 12 feet thick and topographically level. Regardless of entrance type, once the coal seam is reached, mining activities would be relatively horizontal.

In addition to the mine entrance, two subsidence features (sinkholes) were discovered within close proximity of the proposed pipeline route in the southwest quarter of the southwest quarter of Section 34 in East Fork Township (see attached photos 4 and 5 and maps 1 and 2). One of the sinkholes is about 15 feet in diameter and 4 feet deep. It is old and well vegetated. The other sinkhole is about 8 feet in diameter and appears to have opened fairly recently and is filled with field rock. It is possible that the sinkholes represent collapsed mine workings from the Section 4 mine or another coal mine.

There have been instances of subsidence features that are unrelated to mining. Erosion, piping, collapsed structure foundations, outhouses and drill holes have occurred in North Dakota that sometimes resemble subsidence from collapsed underground mines. According to Mr. Beechie, these alternative explanations for the sinkholes are not compelling in this case. However, the sinkholes are within about 25 feet of the boundaries of archaeological site 32WI75, and may, in fact, be features associated with that site (see attached maps 1 and 2).

Site 32WI75 was first recorded in 1983 by S. Dockter and was identified as an historic homestead consisting of three features and a sparse cultural material scatter. The three features initially recorded included a 23 foot long by 13 foot wide depression (see attached photo 6), a well, and a 33 foot diameter area of brush that was believed to have been a corral area. The site was relocated during archaeological surveys for the proposed project in 2006, and all three features were identified. The rocks associated

the sinkholes and the archaeological site appear to be the same in the attached photos, and mapping error may account for the 25-foot discrepancy. The site is being recommended as not eligible for listing on the National Register of Historic Places.

The existence of the abandon mine and discovery of apparent sinkholes in the vicinity of the proposed pipeline appear to warrant geophysical investigations to determine if there are voids beneath the proposed route in the vicinity of the subsidence features and abandoned mine that could pose a risk to construction or operation of the pipeline. Drilling is considered to be the most reliable method for detecting voids. Ground penetrating radar and seismic testing have proven to be ineffective in this part of North Dakota.

Enbridge is proposing to drill holes from the surface of the ground to the coal seam every 30 feet along that portion of the proposed pipeline route that falls within 2,750 feet of the mine entrance (see attached maps 1 and 2). A 30-foot spacing was selected because because a buried 10-inch-diameter grade X-52 pipeline can maintain integrity over a 30 foot unsupported span. Subsurface voids would need to create sinkholes greater than 30 feet to pose a risk to the pipeline. A distance of 2,750 feet from the mine entrance was selected because it will allow testing just beyond the suspected sinkholes at the east end of the test area, and will allow testing on the west end to extend to the elevation of the mine entrance and mining activities. The initial drill holes should verify the depth of coal seam and related mining activities.

Upon completion of drilling, Enbridge will submit its findings to the Public Service Commission. If a void is detected, Enbridge will evaluate the potential risk associated with the void, consider mitigating the void if it poses a significant risk to the pipeline (e.g., by grout injection or engineering the pipeline for a longer span), and/or propose to relocate the pipeline to a more suitable location.

References

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Photo 1: Coal slacks in foreground, collapsed mine entrance in the background. View is to the north. (Source: Bruce Beechie, North Dakota Public Service Commission, Abandoned Mine Lands Division)



Photo 2: Collapsed mine entrance in foreground, stock dam in the background. View is to the southwest. (Source: Bruce Beechie, North Dakota Public Service Commission, Abandoned Mine Lands Division)



Photo 3: Collapsed mine entries (2). View is to the east. (Source: Bruce Beechie, North Dakota Public Service Commission, Abandoned Mine Lands Division)



Photo 4: Well-vegetated subsidence feature. View is to the south. Orange pipeline survey stake is on the ground towards the right of photo. (Source: Bruce Beechie, North Dakota Public Service Commission, Abandoned Mine Lands Division)

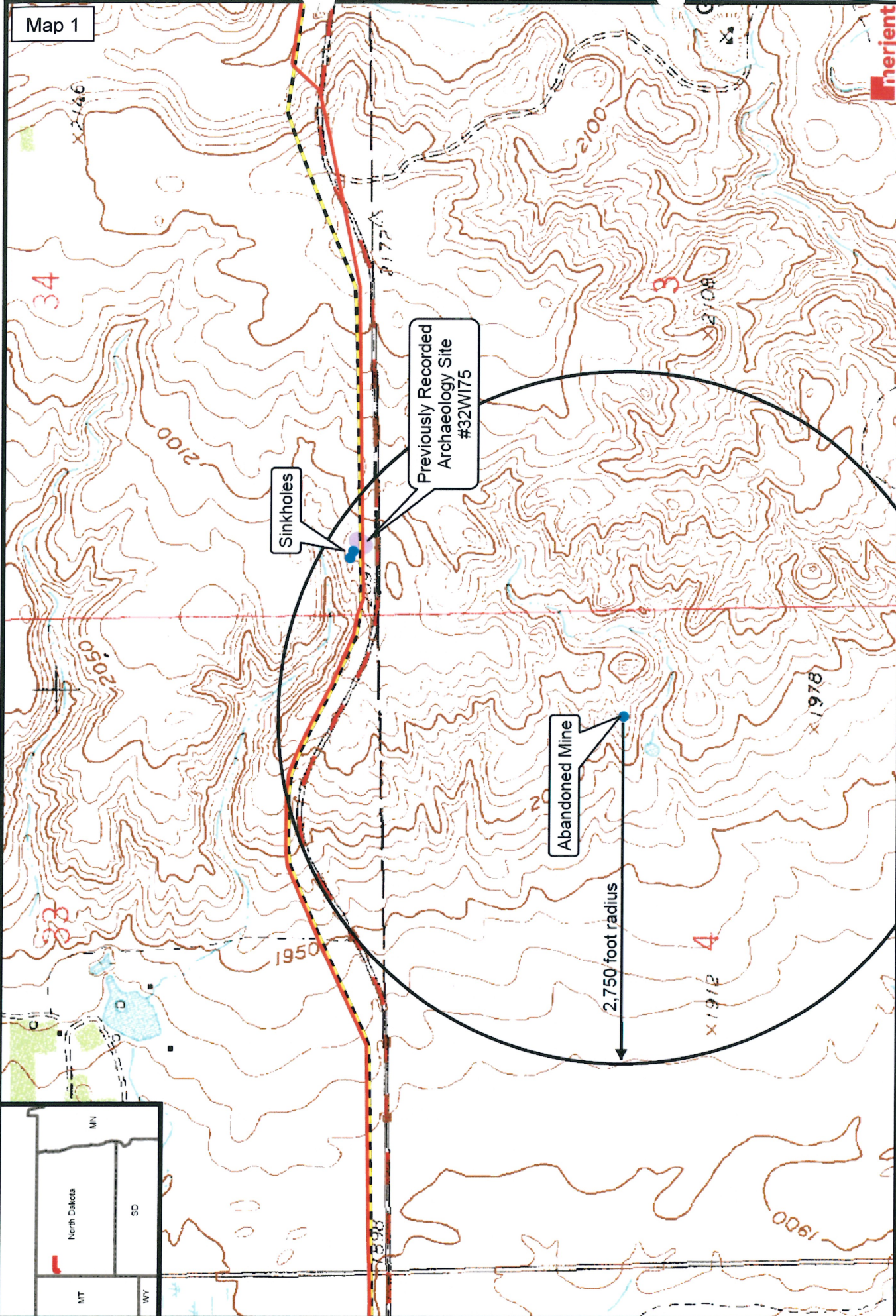


Photo 5: Rock-filled subsidence in foreground, vegetated subsidence in the background. View to the southeast. (Source: Bruce Beechie, North Dakota Public Service Commission, Abandoned Mine Lands Division)

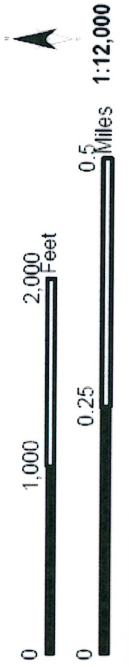


Photo 6: Overview of site 32WI75. View is to the east. (Source: John G. Morrison, Earthworks Archaeology & Environmental Investigative Services)

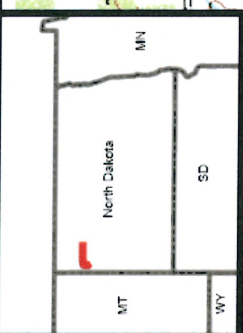
Map 1



Enbridge Pipelines (North Dakota) LLC
North Dakota Pipeline Expansion Project

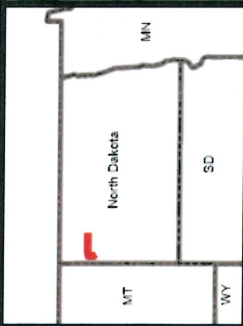
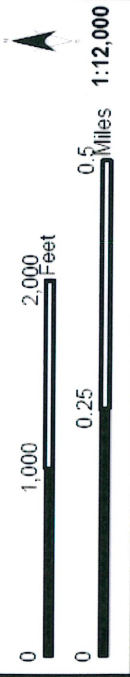
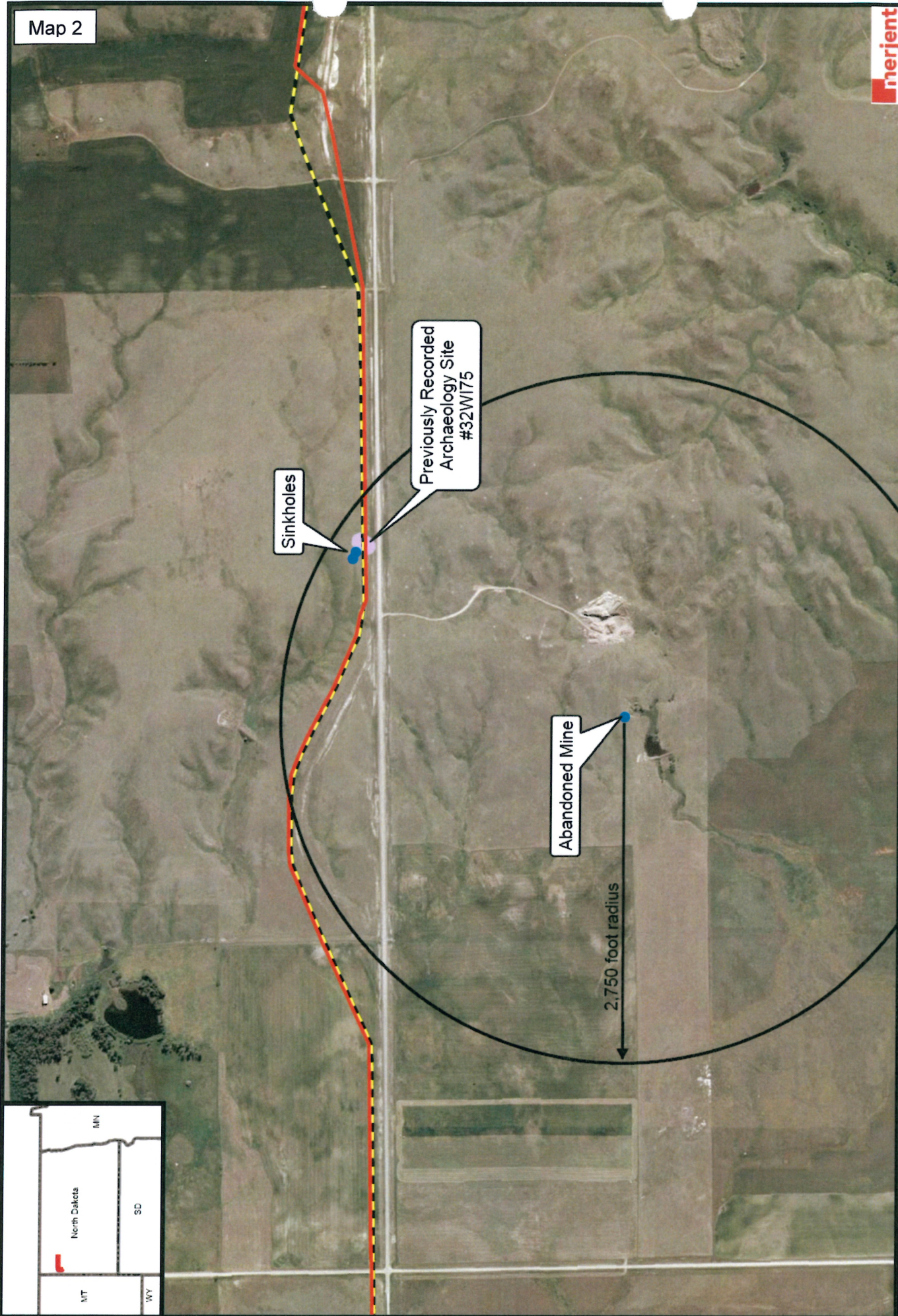


-  Existing Pipeline
-  Proposed Pipeline
-  Estimated Milepost
-  Geologic Features
-  Archaeology Site





Enbridge Pipelines (North Dakota) LLC North Dakota Pipeline Expansion Project



Existing Pipeline

Proposed Pipeline

Estimated Milepost

Geologic Features

Archaeology Site