



**LABORERS DISTRICT COUNCIL
MINNESOTA AND NORTH DAKOTA**

Affiliated with Laborers International Union
of North America

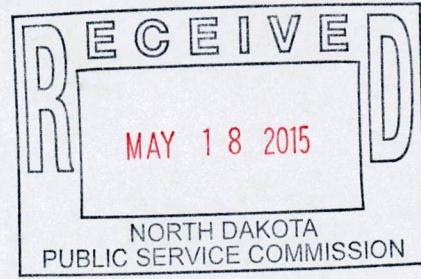
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TODD T. PUFAHL
President & Business Manager

**Petition to Intervene in Sagawea Pipeline Company's Application for a Certificate of
Corridor Compatibility and Route Permit for the Sacagawea Pipeline Project (ND PSC
Docket No. PU-15-114/OAH File No. 20150163)**

May 14, 2015

Mr. Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-4080



Dear Mr. Nitschke:

Pursuant to North Dakota Administrative Code 69-02-02-05, the Laborers District Council of Minnesota and North Dakota ("Laborers Union") herewith submits its Petition to Intervene in the above referenced dockets. If you have any questions, please feel free to contact Kevin Pranis, Marketing Manager, at 612.224.6464 or kpranis@liunagroc.com.

Sincerely,

Todd Pufahl
President & Business Manager

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Petition to Intervene

Laborers' District Council of Minnesota and North Dakota

Todd Pufahl, President

NORTH DAKOTA PUBLIC SERVICE COMMISSION

<p>In The Matter Of The Application Of Sacagawea Pipeline Company For A Certificate Of Corridor Compatibility And Route Permit For The Sacagawea Pipeline Project</p> <p>ND PSC Docket No. PU-15-114</p> <p>OAH File No. 20150163</p>	<p>Petition For Intervention</p> <p>Laborers' District Council Of Minnesota And North Dakota</p>
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The Laborers' District Council of Minnesota and North Dakota ("Petitioner") hereby petitions for intervention as a party in the above-captioned dockets for the Certificate of Corridor Compatibility and Route Permit for the Sacagawea Pipeline Project (the "Project") pursuant to NDAC 69-02-02-05.

Petitioner is a democratic labor organization that, together with its five affiliated Local Unions represents more than 12,000 construction workers and public employees in Minnesota and North Dakota. Petitioner is also affiliated with the Laborers' International Union of North America, which represents roughly half a million construction workers and public employees across the United States and Canada. Petitioner's principal place of business is located at 81 East Little Canada Road in Little Canada, Minnesota.

Petitioner and its affiliated Local Unions represent our members in many capacities, including, but not limited to, referring members for construction employment; bargaining with union employers over wages, benefits and working conditions; representing members in disputes with employers; encouraging construction owners and contractors to use union labor; advocating for public policies that protect the rights and livelihood of workers; providing health, retirement, training, and vacation savings benefits through joint labor-management funds; and educating our members about issues that affect their jobs and lives.

Petitioner's legal rights, duties, or privileges may be affected by the outcome of this contested case for the following reasons:

- The union members represented by Petitioner, together with their families and communities, have an interest in the construction jobs that could be created and preserved by the proposed pipeline. The jobs at stake include not only those generated by construction of the pipeline, but also upstream jobs in the Bakken oil fields and downstream jobs refineries that will be directly impacted by the disposition of the case.
- The union members represented by Petitioner, together with their families and communities, have an interest in the reliability and affordability of crude oil that serves as feedstock for area refineries. While all North Dakota residents benefit from reliable supplies of gasoline or other petroleum products, our members and our employers are among the most sensitive to shortages and price spikes because our work requires extensive travel and movement of material to far-flung job sites.
- The union members represented by Petitioner, together with their families and communities, have an interest in proper pipeline siting, construction, maintenance, and operations practices which help to maintain public confidence in, and support for, pipeline infrastructure. For this reason, our union seeks to be an active stakeholder in public decision-making regarding pipeline infrastructure at both policy and the project levels.

Based on our current understanding of the project, the Laborers Union seeks intervene in support of the applicant's petition. Timely approval of the project could not only create new employment opportunities for construction workers – including individuals for whom the project will be a gateway to a life-long construction career – but also contribute to health of North Dakota's economy and construction industry by helping to improve our oil transportation infrastructure and sustain the economic benefits of the Bakken oil boom to our state.

Petitioner seeks party status in order to share our perspective and our expertise with the North Dakota Public Service Commission and the other parties to this case in order to:

- Explain how a pipeline project such as the project currently under consideration provides not just short-term employment but also long-term career opportunities, including opportunities for new entrants to begin a construction career.
- Explain the pipeline construction process and the procedures that should be used to safeguard the integrity of the pipeline and minimize disturbance to the environment, with a focus on how skilled workers and experienced contractors work to ensure that the quality of the final product meets or exceeds the architect's drawings and specifications.

- Explain the economic, environmental, and public safety risks associated with inadequate pipeline infrastructure and how timely approval of the Sacagawea pipeline might mitigate those risks.

No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above. Other parties such as the applicant bring considerable expertise in the development and operation of pipelines, but pipeline construction unions are the only group that represents workers who are in the trenches every day and who see every aspect of construction and maintenance first-hand.

Petitioner has reviewed the requirements of NDAC 69-02-02 and is prepared to participate in the process as required by the Administrative Law Judge.

Dated: 5/14/15

Respectfully Submitted,

Laborers District Council of Minnesota & North Dakota



By: Todd Pufahl, President & Business Manager
Dan Olson, International Representative
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