



**LABORERS DISTRICT COUNCIL  
MINNESOTA AND NORTH DAKOTA**

Affiliated with Laborers International Union  
of North America

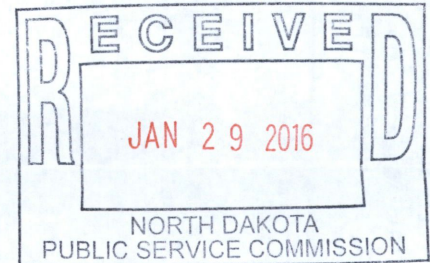
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TODD T. PUF AHL  
President & Business Manager

**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-15-744/OAH File No. 20150619)**

January 29, 2016

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](mailto:kpranis@liunagroc.com).

Sincerely,

Todd Pufahl  
President & Business Manager

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**Petition to Intervene**

Laborers District Council Minnesota and North Dakota  
Todd Pufahl, President & Business Mgr.

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.

The Laborers Union seeks intervene in support of the applicant's petition in order to ensure that that the project can proceed in a manner that benefits skilled construction workers, the oil and gas industry, and the general public in North Dakota.

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 can provide 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.

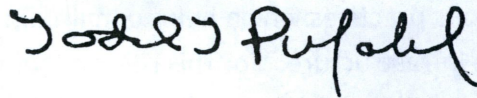
No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above. Other parties such as the applicant bring considerable expertise in the development and operation of pipelines, but pipeline 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: 1/29/2016

Respectfully Submitted,

Laborers District Council of Minnesota & North Dakota



By: Todd Pufahl, President & Business Manager  
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