



LiUNA!

**LABORERS DISTRICT COUNCIL
MINNESOTA AND NORTH DAKOTA**

Affiliated with Laborers International Union
of North America

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TIMOTHY MACKEY
President & Business Manager

**Petition to Intervene in the application for a Certificate of Corridor Compatibility and
Route Permit for a 150-mile 10-inch pipeline filed by Cenex Pipeline LLC (ND PSC
Docket No. PU-17-097/OAH File No. 20170124)**

July 7, 2017

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 me at 612.224.6464 or kpranis@liunagroc.com.

Sincerely,

Kevin Pranis
Marketing Manager

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Petition to Intervene

Laborers District Council Minnesota and North Dakota
Kevin Pranis, Marketing Manager

NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application for a Corridor
Certificate and Route Permit for a 150-Mile
Long, 10-Inch Pipeline in Williams, Mountrail
and Ward Counties, North Dakota

ND PSC Docket No. PU-17-097

OAH File No. 20170124

Petition for Intervention

Laborers' District Council of Minnesota
And North Dakota

The Laborers' District Council of Minnesota and North Dakota ("Petitioner") hereby petitions for intervention as a party in the above-captioned dockets for a Certificate of Corridor Compatibility and Route Permit for a 150-mile 10-inch refined fuel pipeline proposed to be constructed by Cenex Pipeline LLC (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 and other oil fields, and downstream jobs in refineries that could 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 regional fuel supplies because our members and their 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 union members represented by Petitioner have an interest in the safety of pipeline and oilfield workers, and in efforts to protect workers from construction hazards as well as the danger that our members recently faced construction of the Dakota Access Pipeline. We believe that our participation in permitting can make projects safer for all concerned and help to allay public fears concerning pipelines.

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 local residents to begin a construction career.

- Explain the pipeline construction process and the procedures that are 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 and aging pipeline infrastructure, and how timely approval of the proposed 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: 7/7/17

Respectfully Submitted,

Laborers District Council of Minnesota & North Dakota



By: Kevin Pranis, Marketing Manager
81 East Little Canada Road
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