

Petition to Intervene in the application by Bridger Pipeline LLC for a Certificate of Corridor Compatibility and Route Permit for a 16-inch Pipeline in McKenzie and Golden Valley Counties, North Dakota (ND PSC Docket No. PU-21-48/OAH File No. 20220094)

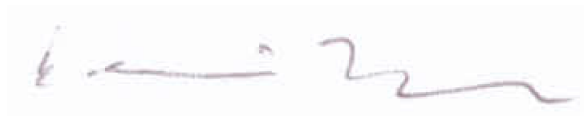
April 25, 2022

Hon. Timothy J. Dawson
Administrative Law Judge
Office of Administrative Hearings
2911 North 14th Street - Suite 303
Bismarck, North Dakota 58503

Dear Judge Dawson:

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

Sincerely,



Kevin Pranis
Marketing Manager
LIUNA Minnesota & North Dakota
(612) 224-6464
kpranis@liunagroc.com

NORTH DAKOTA PUBLIC SERVICE COMMISSION

<p>In the Matter of the Application by Bridger Pipeline LLC for a Certificate of Corridor Compatibility and Route Permit for a 16-inch Pipeline in McKenzie and Golden Valley Counties, North Dakota</p> <p>ND PSC Docket No. PU-21-48 OAH File No. 20220094</p>	<p>Petition for Intervention Laborers District Council of Minnesota and North Dakota</p>
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The Laborers District Council of Minnesota and North Dakota (“LIUNA Minnesota & North Dakota” or “LIUNA”) hereby petition for intervention as a party in the above-captioned docket for a Certificate of Corridor Compatibility and Route Permit for a 16-inch Pipeline (the “Project”) that is proposed to be constructed by Bridger Pipeline LLC (“Applicant”) pursuant to NDAC 69-02-02-05.

Petitioner is a democratic labor organization that, together with its five affiliated local unions, represents more than 13,000 construction workers and public employees in Minnesota and North Dakota. Petitioner is also affiliated with the Laborers International Union of North America (LIUNA), 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 if the Commission approves or denies Applicant's petition.
- The union members represented by Petitioner, together with their families and communities, have an interest in the power plant construction and maintenance jobs that could be directly affected by the Commission's decision to approve or deny Applicant's petition.
- 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 have faced related to protests against pipeline construction. We believe that our participation in permitting can make projects safer for all concerned and help to address public fears concerning pipeline safety.
- The union members represented by Petitioner, together with their families and communities, have an interest in proper siting, construction, maintenance, and operations practices which help to maintain public confidence in, and support for, energy infrastructure projects. For this reason, our union seeks to be an active stakeholder in public decision-making regarding energy infrastructure at both policy and project levels.

- The union members represented by Petitioner have an interest in the safety of energy infrastructure construction workers, and in efforts to protect workers from construction hazards that can arise on projects such as the proposed Project.

LIUNA seeks to intervene in the above-mentioned case in order to protect the rights and welfare of our members, families and communities, and to ensure that the project can proceed in a manner that benefits both skilled construction workers, the general public, and North Dakota's energy industry. At this point, we are not taking a position for or against the application.

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:

- Determine how the Project might affect our members, including local members employed in the oil and gas and pipeline industries.
- Explain best practices in routing and construction of crude oil pipelines that we believe can safeguard the integrity of the assets, maximize efficient use of resources, and minimize disturbance to the environment and landowners, with a focus on the role played by skilled workers and experienced contractors.
- Ensure that the revised proposal will minimize adverse impacts, contribute to meeting energy needs in an orderly fashion, and support beneficial use of North Dakota's energy resources.

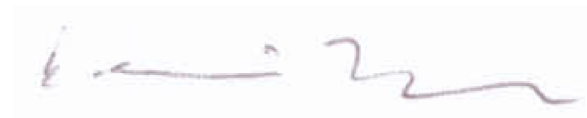
No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above.

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. Our organization has participated successfully as an intervenor in several routing and siting proceedings before the Commission and is familiar with the process.

Dated: April 25, 2022

Respectfully Submitted,

LIUNA Minnesota & North Dakota



By: Kevin Pranis, Marketing Manager
81 East Little Canada Road
St. Paul, MN 55117