



## United States Department of the Interior

NATIONAL PARK SERVICE  
Mississippi National River and Recreation Area  
111 E. Kellogg Blvd., Ste. 105  
St. Paul, Minnesota 55101-1256

IN REPLY REFER TO:

November 5<sup>th</sup>, 2013

Eric Evenson  
District Administrator  
Minnehaha Creek Watershed District  
15320 Minnetonka Boulevard  
Minnetonka, MN 55345

RE: CenterPoint Energy's relocation of an existing gas pipeline near Coldwater Spring

CenterPoint Energy has proposed relocating an existing gas pipeline that travels through Coldwater Spring Unit. The new line would run along the paved trail to the west of our property in MnDOT right-of-way. CenterPoint notified us of the project at the end of August. We met with them onsite twice (August 27<sup>th</sup>, 2013 and September 24<sup>th</sup>, 2013) to discuss the project and our concerns about any potential impacts to Coldwater Spring. We contacted your office after the initial meeting to inform you of the project.

CenterPoint originally planned to utilize a technique called "directional drilling" to place the new pipeline. Directional drilling involves the use of a bentonite slurry under high pressure. We were concerned by this since the drilling would occur over the main and sub fractures in the bedrock that provide the primary source of water for Coldwater Spring. Unintended leakage of the slurry (i.e. frac-outs) could occur, and we were concerned this might allow the slurry to enter the bedrock fractures and impede the flow of water to Coldwater Spring.

After informing CenterPoint of the history and background surrounding Coldwater Spring Unit and the state law (MN Session Law Chapter 101 - S.F. 2049) that protects the flow of water to Coldwater Spring, the company decided to not use directional drilling and instead dig an open trench to lay the new pipeline. The trench will be 4 feet deep, 3 to 4 feet wide and, and at minimum, 10 feet above bedrock. So there is little chance they will come near the bedrock. If for some unforeseen reason they do, the company has developed provisions that they will implement. They will have an archaeologist on-site, monitoring the excavation for any archaeological artifacts. They also plan to monitor the flow of water from Coldwater Spring for the duration of the project. We conduct weekly monitoring of the flow, but plan to measure it once each day during the project as well.

Attached is a list of questions we asked CenterPoint along with their responses prior to the public open house on October 22<sup>nd</sup>, 2013. At this juncture we are satisfied with CenterPoint's approach to the project and look forward to working with them to ensure it is successful and there are no impacts to Coldwater Spring. If you have any questions please contact John Anfinson at 651-293-8432.

Sincerely,

Paul Labovitz  
Superintendent

The following are questions the National Park Service asked CenterPoint Energy regarding the gas pipeline relocation near Coldwater Spring.

Ryan Urich of CenterPoint Energy responded.

October 21<sup>st</sup>, 2013.

Ryan Urich  
Gas Engineer I  
CenterPoint Energy  
700 West Linden Ave  
Minneapolis, MN 55403  
612-321-5054

1. How deep and wide will the trench be?

The trench will be 4' deep by 3'-4' wide. Width depends on whether or not we need to get the pipeline around a bend or curve. We will not be any wider than 4' and I do not anticipate being wider than 3' at all.

2. At what depth will the pipeline be laid?

Pipeline will be at a depth of 3' to 3.5' to the top of the pipe. Trench needs to be 4' deep to accommodate welding of pipe.

3. Do you anticipate encountering bedrock at any point during the project?

We do not anticipate encountering bedrock at all, since the information that we have indicates the bedrock is 14' deep, and we will be 10' over that.

4. If you do encounter bedrock, what procedures will be followed and who will be notified? Are you certain that these procedures will not impact the flow of water to Coldwater Spring?

If we do encounter bedrock, engineering and our environmental consultant, Merjent, will be contacted to assess the situation. More than likely, we will be able to change the grade of the pipe to avoid bedrock. Due to the open trench of the pipeline in the area, this will not impact flow of water to the Spring.

5. Are you 100% confident that the project will not impact the flow of water to Coldwater Spring?

We cannot be 100% sure on any project of frac outs. We are more confident on this project that nothing will be impacted due to the open trench method, which eliminates the need for drilling mud, than if we were going to bore the pipeline in. We have eliminated the bore sections that cross the water fracture line to alleviate the concerns of impacting the water flow.

6. Do you have plans to revegetate the impacted area? What are those plans and can we help inform them in anyway?

We will, as always, restore the area to the pre-construction conditions that we found them in. Our plan is to restore the trail and adjacent grass/boulevard area to pre-construction conditions.

7. Will you need to utilize NPS property at any time during the project?

We will not need to utilize NPS property at all throughout construction.

8. What procedures will be followed if archeological resources are encountered?

We will have a representative from Merjent who specializes in historical and archaeological areas on call at all times. If an artifact is discovered, construction will be stopped and the specialist will be called to assess the find. What is determined after they visit will follow normal protocol for archaeological and historical artifacts after they're found.

9. If/when water is encountered during the trenching, how do you plan on handling it? Will any temporary structures be necessary to stabilize the trenches?

If water is discovered, we can change grade of the pipeline to avoid the water table. If it is water from rain/snow then we will have to pump the water out of the trench to continue working. We have environmental protocols in place that take care of dewatering trenches, such as filters on hoses, natural filtration, or straw bales. We will follow all OSHA rules regarding underground pipeline work and if trench boxes are needed, then they will be used.

We are under the understanding that you have/are working with the Minneapolis Park and Recreation Board, Fort Snelling State Park, and the City of Minneapolis on planning the re-route of Fort Snelling State Trail and ensuring all safety and legal requirements are being met. The Minnesota State Historic Preservation Office should be informed as well in the event artifacts are discovered.