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April 10, 2015

(Via facsimile and Courier)

National Energy Board
517- 10th Ave SW
Calgary, AB, T2R 0A8

Attention: Sheri Young, Secretary of the Board

Dear Madam:

Re: Enbridge Pipelines Inc. - Line 3 Replacement Program
National Energy Board File OF-Fac-Oil-E101-2014-11-02

We are counsel representing CAEPLA/MPLA/SAPL with respect to the above noted matter. We are pleased to advise the Board that CAEPLA/MPLA/SAPL have resolved with Enbridge issues related to Enbridge's proposed new Line 3 construction and enclose for the Board's reference the Settlement Agreement of the parties in this regard dated March 5/15. As provided in s.5.3 of this Settlement Agreement, CAEPLA/MPLA/SAPL landowners support Enbridge's Line 3 Replacement Program but expressly excepted from this landowner support is Enbridge's proposed decommissioning of existing Line 3. Landowner concerns with respect to Enbridge's proposed existing Line 3 decommissioning are addressed in CAEPLA/MPLA/SAPL's Application to Participate filed with the Board March 17/15 and, pursuant to s.9.2 of the Settlement Agreement, are the subject of continuing consultation between the parties.

While CAEPLA/MPLA/SAPL landowners have agreed to Enbridge's proposed methods and timing of construction for replacement Line 3, they remain very concerned that Line 3 Replacement not proceed until decommissioning issues have been satisfactorily resolved either through the current consultation or, if necessary, as determined by the Board following completion of the public hearing. CAEPLA/MPLA/SAPL continues to respectfully request that the Board include in its Hearing Order provision for a robust and thorough hearing process, to include an oral component, to enable the Board to fully consider and determine the decommissioning issues identified by CAEPLA/MPLA/SAPL. If such a process can accommodate Enbridge's proposed construction commencement and in service

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SALE DE COURIER
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NEB/ONE

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dates of August/16 and Q4 2017 respectively, CAEPLA/MPLA/SAPL will work cooperatively with the Board and Enbridge to achieve this objective.

Yours very truly,

COHEN HIGHLEY LLP



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Enclosure
/lm