

LiUNA! LOCAL 1686

June 6, 2016

Kim Rickard, Business Manager
Laborers International Union of North America
Local Union 1686
3100 Horse Shoe Bend Road
Helena, MT 59602

Via E-Filing

State of Montana
Public Service Commission
1701 Prospect Ave
P.O. Box 202601
Helena, MT 59620-2601

Re: In the Matter of ONEOK Elk Creek Pipeline, LLC's Notice Of Acceptance of the Provisions of Chapter 13 of Title 69 of the Montana Code and Application for Recognition as a Common Carrier, Docket No. N2018.4.30

Dear Members of the Montana Public Service Commission:

Pursuant to the Notice of Application and Opportunity to Comment dated May 7, 2018, please see the Comment Letter of the Laborers International Union of North America, Local 1686, in the above referenced case.

Sincerely,

/e/ Kim Rickard

Kim Richard

CC: Montana Consumer Counsel, and William Mercer and Hannah Tokerud, Holland & Hart

**COMMENTS OF THE LABORERS INTERNATIONAL UNION OF NORTH
AMERICA, LOCAL 1686**

My name is Kim Rickard, I was born and raised in Butte, Montana. I am also the Business Manager for the Laborers International Union of North America (LIUNA) Local Union 1686. Our office is located in Helena, Montana. Our local union is a democratic labor organization representing 1,300 workers throughout the state of Montana, most of whom are construction workers, and many of whom live or work in the counties traversed by the proposed Elk Creek Pipeline.

LIUNA knows how important the Energy sector is to Montana's economy. At least half of the work our union does is in the Energy sector. LIUNA members work at Colstrip, we build wind farms, we maintain refineries, and we build and maintain pipelines. Our members built the 302-mile, 30-inch Bison natural gas interstate pipeline in 2011 and 2012. We also perform integrity maintenance work on Phillips 66's pipelines across Montana. We live in the communities where we work, and we take pride in the work we do.

On April 23, 2018, ONEOK Elk Creek Pipeline, LLC, filed a Notice of Acceptance and Application with the Montana Public Service Commission. In the filing, ONEOK expressed its acceptance of the provisions in Chapter 13 of Title 69 of the Montana Code and requested recognition as a regulated common carrier. We support the proposed Elk Creek Pipeline, and our comments are in support of ONEOK's Application, Docket No. N2018.4.30.

ONEOK has proposed to construct a new interstate pipeline, and related infrastructure, to transport unfractionated natural gas liquids (NGLs) from near ONEOK's Riverview terminal in eastern Montana to its existing NGL facilities in Bushton, Kansas. The 900-mile, 20-inch Elk Creek Pipeline will parallel ONEOK's existing Bakken NGL Pipeline and cross Richland, Wibaux, Fallon, and Carter Counties.

The pipeline will cost \$1.2 billion and is one of ONEOK's biggest pipeline projects to date. The project will have positive net benefits to the economy and employment. Hundreds of workers will be employed during the construction of the pipeline. We hope the workers will be local pipeline workers like members of my union. If ONEOK uses unionized labor on this project, it will support hundreds of family supporting jobs, the type of jobs that Montana needs more of.

The Dakota Access Pipeline, a 1,100 mile, 30-inch crude oil pipeline, is an example of the opportunity the Elk Creek Pipeline can create for Montana. Construction of the pipeline resulted in direct spending amounts of \$656 million in North Dakota, \$486 million in South Dakota, \$628 million in Iowa, and \$367 million in Illinois. Expenditures also included \$140 million of construction equipment from American manufacturers and \$189 million in direct payments to landowners for easements. Construction generated \$127.9 million in state and local sales taxes, and \$28.1 million in state and federal income taxes. In addition, the pipeline generates \$55 million annually in property tax revenues.

The Elk Creek Pipeline will grow the local economy and support good paying jobs for Montana workers.

We urge the Commission swift approval of ONEOK's Application to be a common carrier in the state of Montana.