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From: Tarpley, Kyle <kyle.tarpley@hq.dhs.gov>
Sent: Monday, February 02, 2015 4:56 PM
To: DOSExecSec; Tadler, Francesca J
Cc: Tarpley, Kyle; Totaro, Juliana
Subject: [DHS Response] TransCanada Keystone Pipeline Presidential Permit Application
Attachments: 01.31.14 - DOS - Keystone Presidential Permit - comments - 14.0004.10.doc

DOS Exec Sec

DHS has no objection to the issuance of the Presidential Permit for the TransCanada Keystone Pipeline, approved by Executive Secretary Kim O'Connor. Attached are comments submitted previously in April 2014 from our Component agency, U.S. Customs and Border Protection (CBP), regarding the finer details of the project. We would appreciate if you could please confirm that the comments will be considered/addressed with the point of contact from CBP listed in the matrix.

Best

Kyle

Kyle Tarpley
Office of the Executive Secretary
Office of the Secretary
Department of Homeland Security
202.447.3658

Document Clearance Comment Form

Title or Description of Document: TransCanada Keystone Pipeline Presidential Permit Application to Construct, Connect, Operate and Maintain Pipeline Facilities on the Border of the United States and Canada	DHS POC: Karl H. Calvo, Executive Director, Facilities Management and Engineering, U.S. Customs and Border Protection (202) 325-4392
Comments provided by: DHS	
Date: 22 April 2014	

#	Reference	GENERAL COMMENTS
1.	General	CBP notes that shifting area oil imports from truck and/or rail to the underground pipeline mode will shift the associated CBP workload from pre-release targeting and review to post-release processing in the area port. This will necessitate certain internal adjustments and may require time to implement them.
2.	General	CBP would like to be informed about the steps the project proponent plans on taking to secure the pipeline against terrorism. CBP recommends paying special attention to security during and after the pipeline construction to make sure it does not become a terrorist target.
3.	General	CBP would like to be informed about the project proponent's plans to mitigate the anticipated increase in criminal activity due to the influx of construction workers during the project implementation.
4.	Chapter 2.1, p. 2.1-71, para 2	Please indicate how long it will take to respond if there is a spill since pipeline operation is monitored remotely and the operations center is in Calgary, Canada.
5.	p. 2.1-71, para. 2	Please clarify where the heaters for the pipeline are located since the pipeline will run at elevated temperatures that are higher than ambient temperatures.
6.	p. 2.1-72, last line	Will the aerial surveillance planes be identified?
7.	General	It appears that the Phillips pump station will be built about 13 miles due east of the Morgan Land Port of Entry on Rt. 191 in Morgan, MT. Will construction roads be built off of Rt. 191 to access the site? If so, where will they be located?
8.	p. 2.1-71, para 2	The Supervisory Control and Data Acquisition (SCADA) system that monitors pipeline operation appears to use radiofrequency but it is not clear. CBP will need to ensure this monitoring system does not create interference with any of its IT equipment.
9.	p. 2.1-71, last para.	Will the ground patrols be identified? Will they be crossing the border between Canada and the US?
10.	p. 2.1-79, first para.	Will the port officers at Morgan, MT LPOE be expected to play any role in the event of an emergency situation with the pipeline?
11.	2.1.5.3 Fuel Transfers	Where are the approved contractor yards and pipe yards? Do they impact CBP facilities and/or equipment?
12.	2.1.8.5 Ripping	Will this occur near any CBP facilities and/or communications equipment? This has a potential to disrupt CBP activities.
13.	2.1.8.5 Ripping	Frac Outs. Please clarify if this will impact CBP facilities if happens during HDD? Will HDD be done in Phillips County?

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14.	2.1.8.5 Ripping	ROW Clearing. Please coordinate any tree trimming or tree removal in the border area with CBP ahead of time.
15.	p. 2.1-79, first para.	Is it anticipated that any oil emergency responders will be coming across the border from Canada?
16.	General	Will there be any electric distribution lines and systems associated with Phillips Pump Station? If so, where will they be built?
17.	p.3.13-4, last para.	Will there be any new connections to the Keystone pipeline in the US to allow for transport of the oil generated from oil and gas leases along the pipeline route beyond the Bakken Marketlink Project? If so, where are they likely to occur?
18.	4.15.11	Removal of bank vegetation (including overhead cover) could lead to bank instability and erosion. This erosion could lead to gradual erosion of a road or path that is used by CBP. How will this be addressed if this happens? Will there be monitoring done by the project sponsor to ensure that this doesn't happen?