

BEFORE THE NEBRASKA PUBLIC SERVICE COMMISSION

IN THE MATTER OF THE APPLICATION) APPLICATION NO. OP-0003
OF TRANSCANADA KEYSTONE)
PIPELINE, LP FOR ROUTE APPROVAL)
OF THE KEYSTONE XL PIPELINE)
PROJECT PURSUANT TO THE MAJOR)
OIL PIPELINE SITING ACT)
_____)

REBUTTAL TESTIMONY OF
RICK PERKINS

STATE OF NEBRASKA)
) ss.
COUNTY OF DOUGLAS)

1 **Q: What is your name?**

2 A: F. J. (Rick) Perkins

3 **Q: What is your role with the Keystone XL Pipeline?**

4 A: I joined the project in 2012, and I work as a Project Manager in charge of logistics and
5 services for the Keystone XL Pipeline Project.

6 **Q: Are you responsible for management of construction workforces camps?**

7 A: Yes. To the extent Keystone determines workforce camps are necessary for the
8 construction of the Keystone XL pipeline along the Preferred Routes, I will be a person
9 from Keystone with responsibility for the construction and subsequent oversight of
10 those camps. I am also involved in the evaluation of whether workforce camps are
11 necessary for the project.

12 **Q: Describe the anticipated workforce camps for the Keystone XL Project.**

13 A: The camps will be temporary lodging for the workforce associated with the
14 construction of the Keystone XL. The workforce camps consist of prefabricated
15 modules with sleeping units, a kitchen and dining hall, an infirmary, a commissary, an
16 exercise facility, and other common areas for use by the residents. There is also space

17 for RVs to be parked and for the owners of those RVs to be part of the camp. In
18 Nebraska, if a workforce camp is necessary, it will likely be ^{located} approximately 10 miles
19 northwest of O'Neill, Nebraska.

20 **Q: Have you read the Yankton Tribe's evidence relating to the workforce camps?**

21 A: Yes.

22 **Q: Did you identify any inaccuracies?**

23 A: Yes.

24 **Q: What inaccuracies did you identify?**

25 A: First, the Yankton witnesses incorrectly refer to the workforce camps as "man camps."
26 These camps and the entire workforce are not limited to specific genders, and will
27 include male and female individuals.

28 **Q: Are there other inaccuracies?**

29 A: Yes. Mr. Cooke's statement that the camps bring violence and drug and alcohol abuse
30 is not true. In fact, Keystone has hired Target Logistics Management, LLC ("Target
31 Logistics") to operate the camp(s) because the company is experienced in operating
32 camps internationally and in the United States. Target Logistics operates its camps,
33 which includes the sleeping quarters and the RV spaces, with zero tolerance for illegal
34 drug use, alcohol abuse, or firearm possession. Additionally, all pipeline workers are
35 drug tested before employment and are subject to random drug testing while employed.
36 Target Logistics requires proof of residence before entering the workforce camps,
37 which eliminates the possibility of any visitors, including any who may be involved in
38 illicit sex traffic. The existence of violence, drugs or alcohol abuse is simply not
39 allowed in the Keystone XL workforce camps.

40 **Q: Are there more inaccuracies?**

41 A: Yes. Mr. Cooke assumes a large percentage of the workforce will frequent and
42 apparently abuse the tribe's casino. While the tribe's casino is open to the public and
43 may interest members of the workforce, the practical reality is that the men and women
44 in the workforce will be working at least 60 hours per week Monday through Saturday;
45 the typical work day will begin at approximately 5:00 a.m. and end between 6:00 – 8:00
46 p.m. and involve manual labor. Simply put, the workforce will not have sufficient free
47 time to visit the casino regularly.

48 **Q: Is there any other component of the testimony that requires clarification?**

49 A: Yes. Mr. Cooke incorrectly assumes that Keystone has not planned for the influx of a
50 large number of construction workers along the Preferred Route. To the contrary,
51 Keystone is well aware of the jobs created by the construction of this project which are
52 reflected in the socioeconomic analyses of the Application and the FSEIS. The
53 consideration of those numerous workers is why Keystone is considering a workforce
54 camp northwest of O'Neill. Keystone will also meet with local law enforcement along
55 the Preferred Route following the conclusion of this MOPSA process to ensure
56 Keystone is working productively with law enforcement.

57 **Q:**

58 A:

59 **Q:**

60 A:

61 **Q:**

62 A:

F. J. (Rick) Perkins
Rick Perkins

Subscribed and sworn to before me this 14th day of July, 2017.

Darla L. Steffes
Notary Public

