



October 20, 2026

Jesse Krzenski
Environmental Review Program Director
Minnesota Environmental Quality Board
520 Lafayette Road North
St. Paul, MN 55155
info.EQB@state.mn.us

Re: Pulsar Helium Comments on Draft Modifications to Proposed Expedited
Amendments to Rules Governing the Environmental Review Program Addressing
Gas Resource Development Projects, Minnesota Rules, Chapter 4410, Revisor's ID
Number R-04945

Mr. Krzenski:

Pulsar Helium Inc. ("Pulsar") appreciates the opportunity to provide comments to the Minnesota Environmental Quality Board (EQB) on the EQB's draft modifications to its Proposed Expedited Amendments to Rules Governing the Environmental Review Program Addressing Gas Resource Development Projects, Minnesota Rules, Chapter 4410, Revisor's ID Number R-04945 (the "Proposed Rules"). Pulsar is a North American multi-project helium exploration and development company. In recent years, Pulsar has discovered a significant concentration high-grade helium in Minnesota. It is Pulsar's view that development of this helium resource would improve the reliability of the helium supply chain and, in turn, public health and safety.

As noted in our comment letter on the initial draft of the Proposed Rules, Pulsar is generally supportive of the Proposed Rules. We have anticipated that our Topaz helium project would require an environmental assessment worksheet (EAW), and we look forward to cooperating with the DNR to understand any potential significant environmental impacts from the project and find ways to mitigate them. In terms of the proposed modifications to the Proposed Rules, Pulsar concurs with EQB's proposed removal of the mandatory EAW and EIS categories relating to conduct already prohibited under Minnesota law. Pulsar respectfully

offers the following comments to ensure that the Proposed Rules require mandatory EAW review only where justified by a project's location, scale, and potential environmental effects.

First, Pulsar respectfully disagrees with EQB's proposal to add a mandatory EAW category for gas resource development projects located within groundwater-based drinking water supply management areas ("DWSMAs"). As it stands, Minnesota law already provides a comprehensive regulatory framework for protecting DWSMAs from potential contamination. Each DWSMA is governed by a site-specific wellhead protection plan. See Minn. R. 4720.5130. In developing that plan, a required well vulnerability assessment is conducted to evaluate geologic conditions throughout the DWSMA, including conditions that could create or reveal potential contamination pathways associated with drilling. Minn. R. 4720.5210. To the extent any pathways or other potential contaminant sources are identified, the wellhead protection plan and its implementing plan of action must address them. Minn. R. 4720.5250. Thus, the potential impacts that the proposed mandatory EAW category is intended to evaluate are already addressed through Minnesota's wellhead protection requirements.

While Pulsar agrees that protecting groundwater should remain a high statewide priority, the location of a gas resource development project within a DWSMA does not, on its own, establish a risk of significant environmental effects so long as the project complies with existing regulatory safeguards. Requiring an EAW based solely on a project's location within a DWSMA would unnecessarily duplicate those existing regulatory protections.

Second, Pulsar supports retaining five wells as the threshold for mandatory EAW review, even though a lower threshold would be unlikely to effect the Topaz project. As discussed at length in EQB's April 3, 2026, Rule Summary and Justification Memo, projects consisting of five or more wells may present potential environmental impacts warranting mandatory EAW review. Minn. Env't Quality Bd., *Rule Summary and Justification* (Apr. 2026), <https://www.eqb.state.mn.us/sites/eqb/files/Gas%20resource%20mandatory%20categories%20summary%20and%20justification.pdf>. While Pulsar understands that some comments have suggested that EQB lower this well threshold, there is no support finding that a project of less than five wells may have the potential for significant environmental effects. *Id.* Given analyses from comparable projects in other states, the five-well threshold strikes the appropriate balance between meaningful environmental review and avoiding unnecessary review of smaller projects.



If you have any questions or concerns regarding these comments, please don't hesitate to reach out to me. We look forward to continuing to participate in the EQB's rulemaking process and working to develop Minnesota's helium resources in a safe and environmentally sustainable manner.

Sincerely,

A handwritten signature in blue ink that reads "Brad W. Cage". The signature is written in a cursive, flowing style.

Brad Cage, P.E.
Vice President - Engineering

Public comments for Maplewood Development Variance request for Hillview Business Park in TCAAP in Arden Hills

EQB meeting: October 21, 2026

I live in the Shamrock Park neighborhood off County Rd. 1 (Arona St. between Pascal and Asbury) across the county road from the proposed Hillview Industrial Business Park development in TCAAP in Arden Hills. I am one of several neighbors actively organizing and keeping our neighborhood of 565 plus homes informed about this proposed development.

I provided public comments asking the EQB Board to deny the variance request for Hillview at your September 16 meeting, as I am unable to attend the October 21 meeting where the variance request will be reviewed and voted on. I also provided written comments during the comment period.

I want to sincerely thank the EQB staff for their thorough work on this request and for taking our neighborhood's environmental and safety concerns seriously. I strongly urge the Board to accept the staff recommendation to deny the variance request for Hillview development. We appreciate the staff recognizing and communicating that there is an insufficient need and proof for an early demolition and clean up on the site. As well as real potential for long-term environmental impacts if this request is allowed before the full environmental review is completed.

While we are encouraged by this recommendation, significant concerns remain as this proposed development moves through the environmental review process. As this project advances, we ask that the Board and state agencies continue exercising full due diligence to protect our neighborhood, open spaces and wildlife, while ensuring community concerns remain a central consideration in every future decision.

Thank you for your time and for your commitment to environmental leadership in Minnesota.

Alyssa Kruzel
Arona St., Shamrock Park Neighborhood
Shoreview, MN

From: Amber Brookman [REDACTED]
Sent: Monday, October 19, 2026 5:10 PM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: Public comment for Wednesday's EQB meeting

Hello Staff,

I'm a resident of the Shamrock Park neighborhood closest to the proposed Hillview Business Project. I had planned to attend the meeting this upcoming Wednesday to make a comment but my schedule has unfortunately been double booked.

I'd like to make a formal comment in writing urging the EQB to agree with your own Staff's suggestions that the variance requested by Maplewood development be denied. As constituents I think we've made it well aware what our concerns are, from devastating environmental impacts to serious safety concerns for neighborhood residents, schoolchildren in the area and wildlife.

I believe that any environmental scientist and pollution control agency would agree that the TCAAP site needs to be handled with fine gloves, rushing through necessary processes can and will open up a can of worms on the land that cannot be undone.

Thank you again for your advocacy and Staff recommendations on this project. My neighbors and I were so stoked with the packet came out with staff recommendations that we are in alignment with. This means everything to us!

Take care,

Amber Brookman
[REDACTED]

From: Gary Keller [REDACTED]
Sent: Monday, October 19, 2026 12:56 PM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: National Childrens Health Month

Dear Minnesota Environmental Quality Board,

October is National Children's Health Month

This coming Sunday will begin National Lead Poisoning Prevention Week

So this coming Sunday will begin, once again, the assurances from MEQB that they are doing everything that they possibly can to prevent lead poisoning - especially in the children living in Minnesota.

There seems to be something amiss this year. Again. Just as it has been for the last 25 years.

Over 70% of all new lead emissions each year come from general aviation airplanes. That comes straight from the EPA. How can you prevent something when your Health Department doesn't even recognize its existence?

They will tell you that all of those airports are safe according to NEI data from the EPA.

They will tell you that they are all safe according to the NAAQS.

It is time to prove them wrong. Do the right thing this year and get children tested for lead in their blood who live near the airport. Prove them right if you can. There are tests that have proven them wrong already.

Thanks for the time,

Gary Keller

From: Jenna V [REDACTED]
Sent: Tuesday, October 20, 2026 11:52 AM
To: MN_EQB_Info <info.EQB@state.mn.us>
Subject: Public Comment

Good Morning,

I'm writing to you in regard to my concerns about Hyperscale Data Center development.

I'm not in support of allowing the Small Modular Nuclear Reactors as there are numerous issues associated with them. Including increased waste volume and issues related to contaminated waste. SMRs will only exacerbate the issue of disposal and storage of radioactive waste. The safety and efficacy are unknown and I'm tired of Monticello/Minnesota being the test subjects of unknown risks. While smaller in size they still maintain the same large problems.

The AUAR completed for Monticello is insufficient. It has numerous gaps and the City refused to complete an EIS to address the issues. MCEA currently has a hearing scheduled in December regarding the insufficient AUAR in Monticello. Yet, Monticello has still been moving forward with the project. This is similar to many cities currently across Minnesota.

Communities not only bear the costs for increased utilities, loss of property value, etc. they also bear the costs from illnesses, missed work/school, etc. associated with pollution from power plants, generators, turbines, & waste streams supporting the buildouts. Sleep disruption, increased stress, and impaired concentration can result from Noises caused by cooling systems, fans, generators, & turbines. It's estimated by researchers from UC Riverside, Caltech, & Rochester Institute of Technology using an EPA model that "data center related air pollution could impose roughly 11.7 billion to 20.9 billion in annual public health costs by the year 2028. Meaning Data Center related health costs could rise 213% between 2023-2028. This pollution could contribute to approximately 600,000 asthma symptom cases and 1,300 premature deaths. This pollution can impact communities outside of the direct vicinity of the Hyperscale Data Centers crossing city & state boundaries. The burdens will not be evenly distributed. Meaning that per this study in the counties hosting a Hyperscale Data Center that the per household health costs can reach about 7 times the national average. It's estimated that even operating at 10% of their allowed limit onsite generators in Virginia contribute to approximately 14,000 asthma symptom cases and 13-19

premature deaths due to emissions of high equates to between \$220-300 million in annual public health costs. Children tend to bear the brunt of this healthcare burden as their organs are still developing and they take on a greater percentage of pollution compared to their body size. These estimates are prior to the build of the 10-20 proposals for Hyperscale Data Centers in MN and prior to the weakening of standards on our government regulations. There have been numerous federal actions taken that increase pollution health risks as data centers expand.

Shifting costs to the public is unacceptable. We need to require that developers and end users are held accountable for the costs they are incurring instead of allowing them to shift the costs to the public for this perceived economic benefit to the city they are building in. We (residents, small businesses, etc.) should not be liable for the costs of pollution, health, utilities, water, or infrastructure incurred because of their existence in our community. We want to see the data proving that these costs won't just fall on us the taxpayers.

I would argue that we should wait until we can use more advanced technology like for example in Finland they recapture the heat produced and transfer it through underground pipes to reuse it in places that need it.

Lastly, we currently have 10X more Data Centers than any other country in the world. In fact, we have more data centers than the next 14 countries combined. The US has between 4-5,000 Data Centers and China comes in 5th place with only 369 according to multiple sources. So why are we still being told we're in a race against China? And if we are in a race at what cost are we willing to win? What are we willing to sacrifice to achieve first place? Are we willing to jeopardize our communities house values, our resources, what about our health, & what about the health of our children?

Thank you,

Jenna Vandenboom

Sent from my iPhone