

April 18, 2019

Meaghan Hoyle Project Assessment Manager Environmental Assessment Office PO Box 9426 Stn Prov Govnt Victoria, BC, V8W 9V1 Canada TransCanada PipeLines Limited 450 – 1<sup>st</sup> Street S.W. Calgary, AB, Canada T2P 5H1

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Email:

kim\_ogilvie@transcanada.com **Web:** www.transcanada.com

CGL4703-CGP-BCEAO-LTR-2497

Dear Ms. Hoyle,

Re: Coastal GasLink Pipeline Project

Request for an Extension to Coastal GasLink EAC # E14-03

Coastal GasLink Pipeline Ltd. (Coastal GasLink) requests an extension to Environmental Assessment Certificate #E14-03 (the "EAC" or "Certificate") dated October 23, 2014 in respect of the Coastal Gaslink Pipeline Project (the "Project"), pursuant to section 18(2) of the British Columbia *Environmental Assessment Act* (the "Act").

As you are aware, the Certificate states that for the purpose of section 18(1) of the Act, the Certificate expires five years from October 23, 2014, unless the project has substantially started. Regardless of whether or not the Project has substantially started, under section 18(2) of the Act a certificate holder may apply in writing to the executive director for an extension of the deadline, and under section 18(4) of the Act the Minister or the executive director may extend a certificate once for up to five years.

The Certificate was issued October 23, 2014, and construction, as defined in Schedule B, was initiated in 2016, that early construction being associated with investigative works. The underwriters for the Project made a positive final investment decision (FID) to proceed with the Project in October of 2018. Following FID, Coastal GasLink began construction in earnest in January 2019. Coastal GasLink then contacted the Project Assessment Manager at the EAO to discuss the status of the Project and to initiate discussions regarding an extension to the Certificate. On March 6, 2019 the EAO advised Coastal GasLink to consider the applicable post certificate guidance provided on its website for requesting a certificate extension.

This letter and the attached information have been prepared and organized in accordance with the 2016 EAO guidance document "Requesting a Certificate Extension" and after consideration of the most recent extension applications of other proponents to the EAO.





### **Reason for the Request**

Coastal GasLink wishes to extend the Certificate to complete construction already begun, to meet its contractual commitments to the parties underwriting the Project. As the EAO is aware, the Project is a \$6.2B 670 km sweet natural gas transmission pipeline that is the sole source of feed gas for the provincially approved LNG Canada Facility now under construction in Kitimat, BC.

Development of the Project was delayed while waiting for a positive FID by the parties underwriting both the Project and the downstream LNG Canada Facility. As noted above, a positive FID decision was made in October 2018.

### **Efforts to Advance the Project**

A considerable amount of work has been conducted on the Project, both physical and otherwise.

Physical Work to Date

As of April 18, 2019, physical work completed includes but is not limited to:

- Clearing 11.5 kilometers (km) of right-of-way;
- Clearing and site preparation for three workforce accommodation camp sites;
- Clearing of the Kitimat meter station site;
- Initiating clearing for installation of a cable crane, to prepare for installation of a pipeline in mountainous terrain;
- Additional clearing of approximately 60 hectares (ha) of laydown areas and storage sites;
- Installation of 15 trailers at one workforce accommodation camp site;
- Construction or upgrading of approximately 82 km of access road;
- Upgrading or installation of 18 bridges; and,
- Employment of approximately 312 full-time field personnel.

Non-physical Work to Date

As of April 18, 2019, non-physical work completed includes but is not limited to:

- Permit preparation and Request for Proposal process for geotechnical investigative works;
- Ordering, and the start of manufacture of, long-lead items, including: approximately \$792M of line pipe, and \$71M of compressors;
- Employment of approximately 102 full-time office personnel;





- Pre-development costs (i.e. costs incurred before the October 2018 FID for work including that which went into the BC regulatory filing) of approximately \$557M;
- Conditional Project contract awards for Indigenous communities in British Columbia of approximately \$620M, and local capacity funding of \$13M;
- Applying for and obtaining amendment(s) to the EAC to provide for alternate routing;
- Applying for and obtaining necessary ancillary permits, including all permits to construct from the BC Oil and Gas Commission;
- Clearing pre-construction conditions and implementing corrective compliance actions during construction; and,
- Design and engineering work.

### Plans for Advancing the Project

By October 23, 2019, work that Coastal GasLink plans to have completed includes but is not limited to:

- Clearing of approximately 283 km of right-of-way;
- Clearing, upgrading, or construction of approximately 228 km of access;
- Completion of clearing of the cable crane hill;
- Completion of eight workforce accommodation camps;
- Significant blasting and grading in Section 8 (the westernmost and most mountainous part of the pipeline route);
- Installation or upgrading of 43 bridges; and,
- Employment of approximately 956 field personnel.

High-level project schedules for all eight sections of pipeline construction along the route are attached.

#### **New Information**

The physical scope of the Project is the same as applied for in Coastal GasLink's original application and amendments. Coastal GasLink is not aware of any changes to the environmental setting (airshed, watershed, or landscape) of the Project nor have any previously unknown or undetected effects been identified that changes the conclusion reached by EAO. In result, prior environmental assessment conclusions and commitments remain valid.





#### **New Scientific and Technical Information**

Coastal GasLink is not aware of any new scientific and technical information pertaining to the EAO's grant of the Certificate or approval of any amendment that changes the conclusions reached by the EAO. Coastal GasLink is aware the policy and regulatory context evolves over time, which Coastal GasLink monitors as part of Project planning.

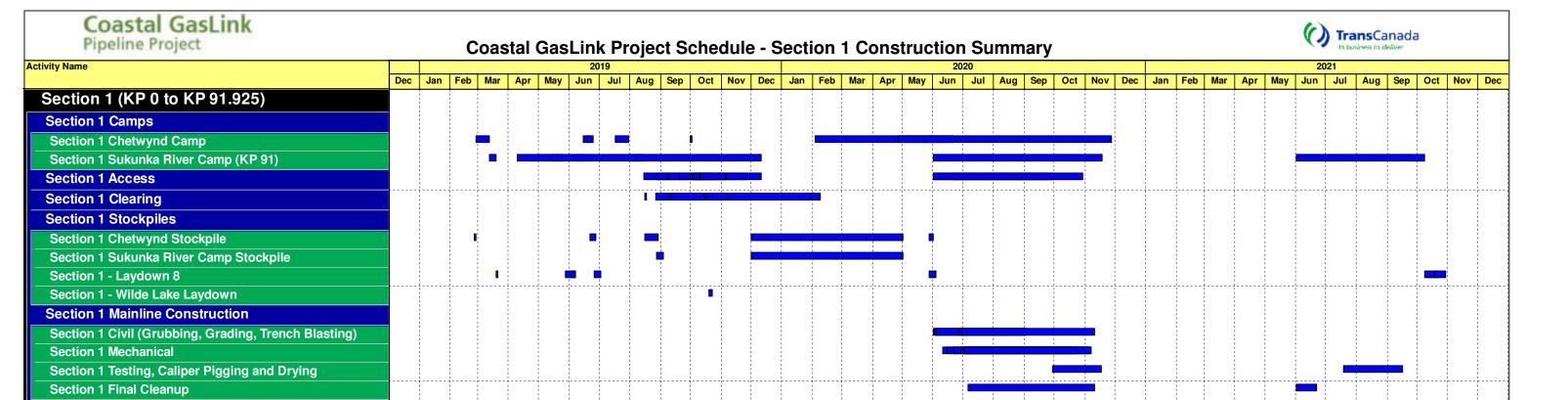
Coastal GasLink is also aware that Crown initiatives and court decisions regarding Indigenous interests continue to evolve. Among the Indigenous communities potentially affected by the Project, support for the Project remains strong. Coastal GasLink has agreements in place with twenty Indigenous communities along the right-of-way. As the EAO is aware, there are opponents to the Project within and associated with one of these communities. Coastal GasLink continues to engage with these parties to address issues and concerns, to share information, and to discuss mitigation and possible benefits associated with the Project. As part of its ongoing engagement, Coastal GasLink remains actively engaged with all Indigenous communities along the route and has initiated engagement with potentially affected Indigenous groups of the intent to seek an extension to the Certificate. As of the date of this submission, no issues or concerns related to the request for an extension have been communicated to Coastal GasLink.

Should you have any questions, please do not hesitate to contact Kim Ogilvie at 403-920-7900 or Kim\_Ogilvie@transcanada.com.

Sincerely,

Kim Ogilvie

Manager, Environment and Permitting



Current Bar Labels

**Section 1 Special Construction Areas** 

**Section 1 Mainline Block Valves** 

**Section 1 Crossings** 

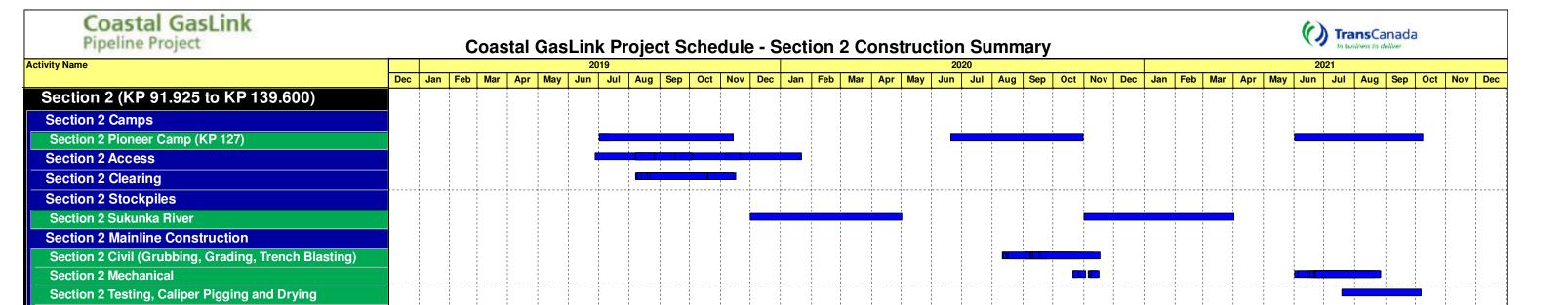
Disclaimers:

1. Schedule is dependent on a positive final investment decision made in 2018.

2. Construction will not begin prior to a positive final investment decision.

3. Schedule details are subject to change with final planning and design activities prior to construction start.

4. Schedule is representative of the current plan and is subject to change with conditions at the time of construction.



Section 2 Final Clean Up Section 2 Crossings

**Section 2 Mainline Block Valves** 

4. Schedule is representative of the current plan and is subject to change with conditions at the time of construction.

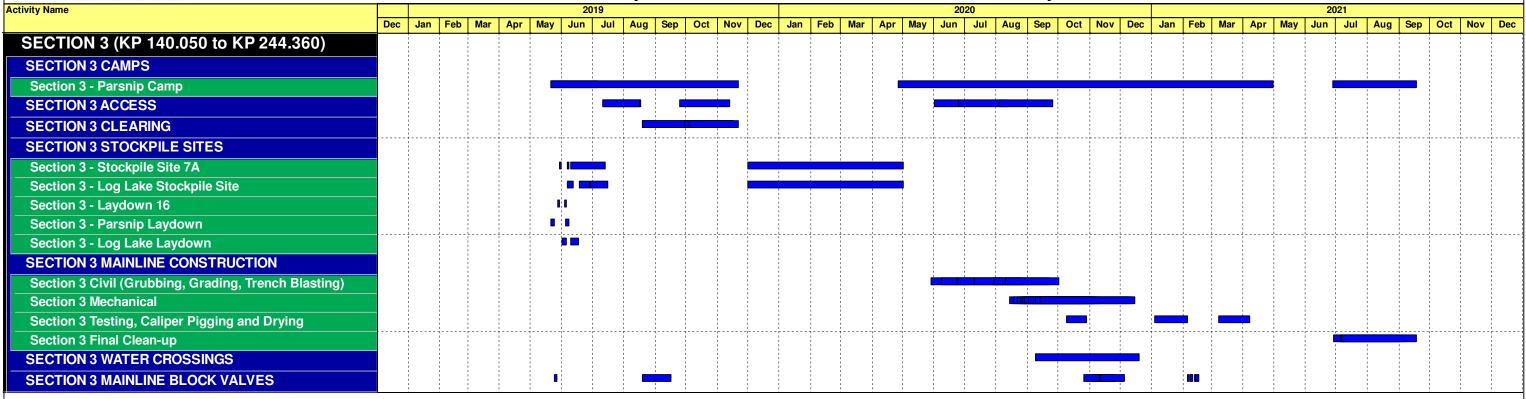
<sup>2.</sup> Construction will not begin prior to a positive final investment decision.

<sup>3.</sup> Schedule details are subject to change with final planning and design activities prior to construction start.



# **Coastal GasLink Project Schedule - Section 3 Construction Summary**





Current Bar Labels

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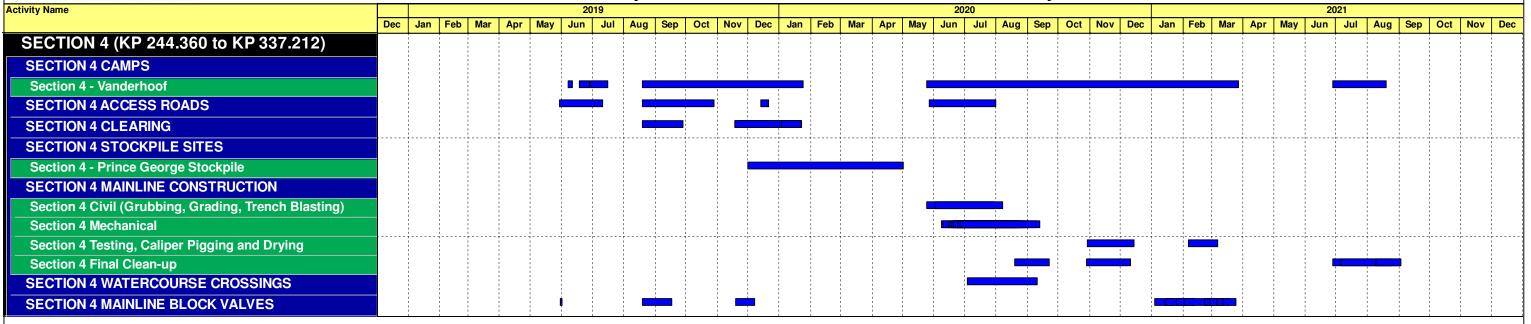
4. Schedule is representative of the current plan and is subject to change with conditions at the time of construction.

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# **Coastal GasLink Project Schedule - Section 4 Construction Summary**



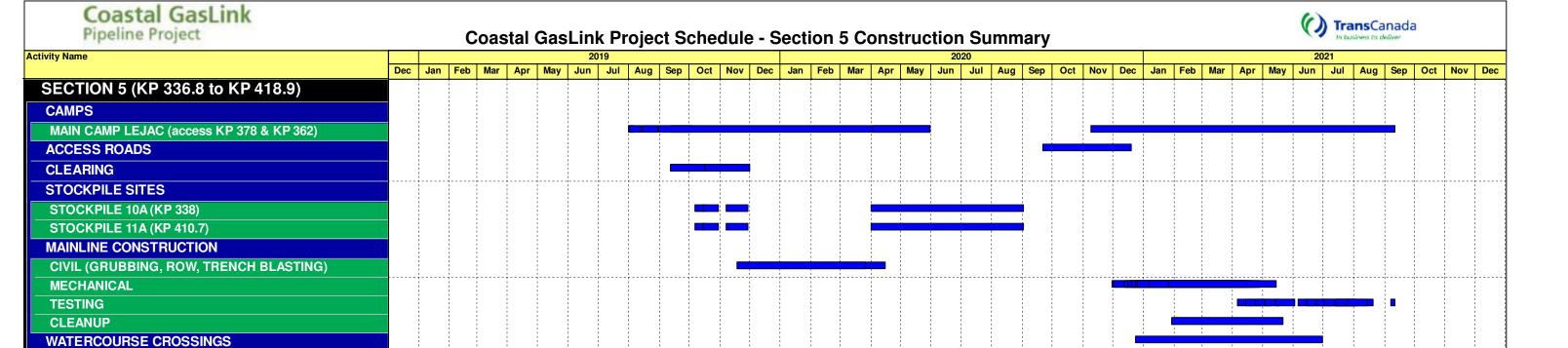


4. Schedule is representative of the current plan and is subject to change with conditions at the time of construction.

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<sup>2.</sup> Construction will not begin prior to a positive final investment decision.

<sup>3.</sup> Schedule details are subject to change with final planning and design activities prior to construction start.



Current Bar Labels

MAINLINE BLOCK VALVES

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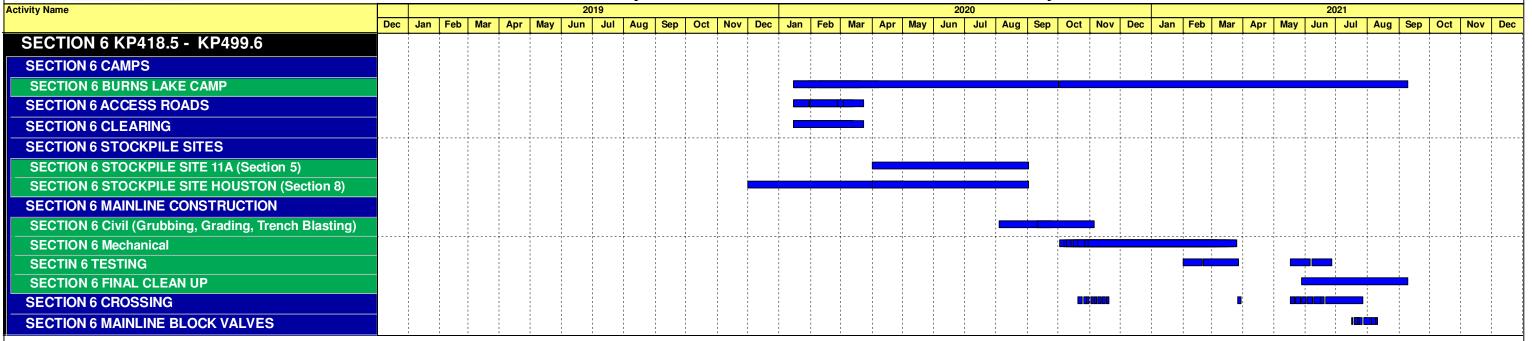
3. Schedule details are subject to change with final planning and design activities prior to construction start.

4. Schedule is representative of the current plan and is subject to change with conditions at the time of construction.



# **Coastal GasLink Project Schedule - Section 6 Construction Summary**





Current Bar Labels

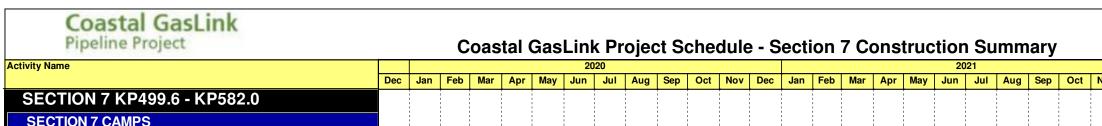
Disclaimers:

1. Schedule is dependent on a positive final investment decision made in 2018.

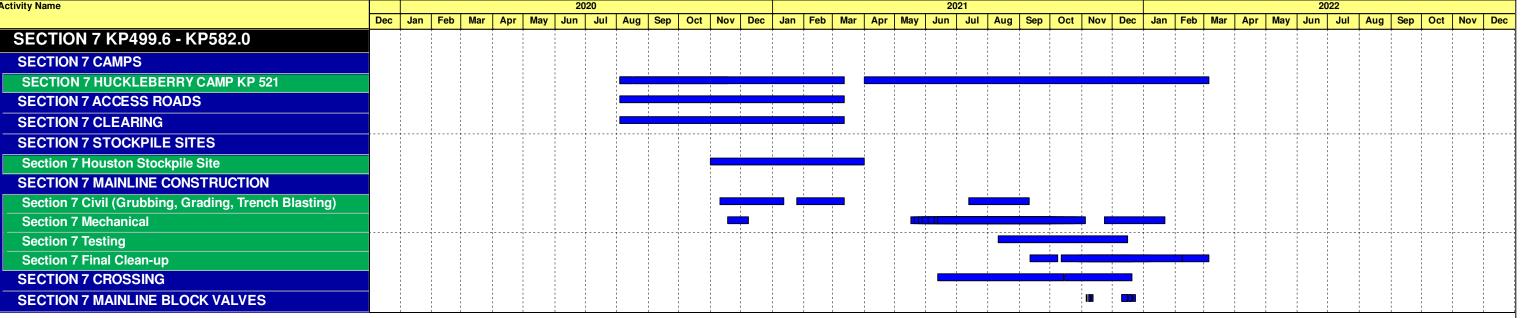
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