

<b>Project Name</b>	Coastal GasLink Pipeline Project	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	E14-03	<b>Inspection No.</b>	IR2022-053
<b>Project Status</b>	Certified	<b>Inspection Start</b>	2022-10-28
<b>Sector</b>	Energy	<b>UTM</b>	10 N 552651 6093782
<b>Trigger</b>	Planned Inspection	<b>Inspection Type</b>	Field
<b>Project Description</b>	The Coastal GasLink Pipeline Project (Project) is an approximately 650 kilometer (km) long natural gas pipeline connecting facilities in northeast British Columbia (BC) to the LNG Canada facility near Kitimat.		
<b>Location Description</b>	The Project commences near Groundbirch (40 km west of Dawson Creek) in northeast BC and runs 650km west to the LNG Canada facility near Kitimat. This inspection covered work being carried out in Section 3 of Work Pack 2, in the upper Anzac River watershed. The Universal Transverse Mercator referenced above is approximately in the center of the sections of where the inspection took place.		
<b>Inspection Summary</b>	<p>On October 28 and 29, 2022, Environmental Assessment Office (EAO) Compliance and Enforcement Officer Chris Parks (EAO C&amp;E) inspected the Project against requirements of the Environmental Assessment Certificate (EAC) #E14-03 (Appendix 1-4), specific Work Execution Plans (WEPs) as per the July 14, 2022, Compliance Agreement (Agreement) (Appendix 5), and order EN2022-028, issued October 14, 2022 (Appendix 6). Within the areas inspected EAO C&amp;E sought to verify status of noncompliance identified during an inspection of the area conducted October 4 and 5, 2022 and documented in EAO Inspection Record IR2022-046 (Appendix 7). The Project was in Construction at the time of inspection.</p> <p>Project staff attended the inspection. Preliminary inspection observations were communicated to Project staff onsite, during the inspection.</p> <p>On December 6, 2022, EAO C&amp;E provided the preliminary inspection record to the Certificate Holder. On December 13, 2022, the Certificate Holder provided comments pertaining to the preliminary inspection record. EAO C&amp;E updated the record, where warranted, based on the CGL submission.</p> <p>The compliance determinations in this report reflect the findings from the inspection dates noted above. These determinations can change at any time upon information gathered through future inspections or if new information is obtained by EAO Compliance and Enforcement Branch.</p>		
<b>In Attendance</b>	ESC Lead, Prime Contractor; Environmental Inspector, Work Pack 2, TC Energy;		
<b>Certificate Holder</b>	Coastal GasLink Pipeline Ltd.		
<b>Mailing Address</b>	450 1st Street S.W. Calgary, AB T2P 5H1		
<b>Contact</b>	Dan Wyman, Regulatory Team Lead, Coastal GasLink, TransCanada		
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**INSPECTION DETAILS**

**Requirement 1:**

**Compliance Agreement Under Section 55 of the *Environmental Assessment Act* (Appendix 5)**

**Article 2 – Compliance Obligations**

**Section 2.4 Work Execution Plan Implementation**

For each Identified Area, the Holder must:

(2) after receiving approval under section 2.3(1)(b) or (c), implement the applicable Work Execution Plan until such time that the portion of the Identified Area covered by the Work Execution Plan demonstrates final site stabilization in relation to ESC risks to ESRs as determined by a Qualified Professional to the satisfaction of EAO.

**WEP KP154+000 to KP157+000 (Appendix 8) and WEP KP146+200 to KP149+200 (Appendix 9).**

- Table 1 “Work Execution Plan Overview, Methodology, and Range” in both WEPs states that following grade completion, the ESC plan in its entirety will be installed.
- All ESCPs included in both WEPs state that the ESCPs are intended to encompass grubbing, stripping, grade, setup, stringing, bending, prep, welding, NDT, coating, ditching, and lowering in phases.

**Findings:**

On October 28 and 29, 2022, Officer Parks inspected against WEP KP154+000 to KP157+000 (Appendix 8) and WEP KP146+200 to KP149+200 (Appendix 9). Within WEP KP154+000 to KP157+000 grading was complete in areas inspected. Within WEP KP146+200 to KP149+200 grubbing and stripping were complete in areas inspected, and grading partially completed.

Measures not installed as required by WEP Table 1 and ESCPs:

The following deviations from the WEPs were observed, that were also noted during the October 4/5 inspection and documented in IR2022-046 (Appendix 7):

WEP KP154+000 to KP157+000

- Waterbars and Travel Lane: a travel lane consisting of rig mats, road base or similar material, and culverts has been constructed through the WEP area. The travel lane is not specified in the WEP. The WEP does state “Non-contact crossings will be used on water bars to prevent and minimize erosion on the ROW”. However, the surface of the travel lane is subject to erosion and sediment transport. While a reference to the travel lane is included on the grade plan, it is not included in the SS ESCPs and control of this erosion has not been considered in the WEP. The travel lane was observed to be actively eroding in multiple locations. The travel lane extends beyond the noncontact water bar crossings. See also EAO IR2022-046 (Appendix 7).
- Pump discharge to an unapproved location at approximately KP155+000. The discharge location has been changed from the location documented in IR2022-046 but remains noncompliant with the WEP.

WEP KP146+200 to KP149+200

- A spoil or stripping pile has been placed immediately adjacent to wetland WL0733 at approximately KP148+525 and remains in-place.

- No woody debris berm has been installed as required along WL0733 as specified by the ESCP between approximately KP148+350 and KP148+525.
- Flumes are not in place as required at approximately KP148+825, KP148+950, KP149+160.

The following additional measures were observed to be not installed in WEP KP154+000 to KP157+000 as required by the WEP:

- Waterbar not installed at approximately KP154+700.
- Woody debris berm missing on hichain side of WC46C at approximately KP155+725.
- Sheet Piles were noted to be installed between approximately KP155+550 to 156+825. The sheet pile walls intercept the waterbars specified by the WEPs in these locations. With the exception of the waterbars on either side of the ESR, there are no voids or openings in the sheet pile wall to allow the waterbars to function. See Photos 1 and 2. See also requirement 4 with respect to maintenance of the waterbars where voids have been cut in the sheet pile wall.

Measures not installed in accordance with installation specifications provided in the WEP:

The WEPs provide specifications for the installation of specific measures as required by the section 2.2(4) of the Agreement. WEP KP154+000 to KP157+000 includes 2 separate specifications for check-dams (Figure A12 Best Management Practices Check Dams, and Drawing STDS-03-ML-05-137). On October 28 and 29 EAO inspected WEP KP154+000 to KP157+000 and noted check dams installed not in accordance with the WEP specifications and in a manner where the check dams would not be effective. Check dams are installed on slopes that exceed the specification, are spaced too far apart, and are not keyed in. These observations are consistent with observations of check dams in this WEP made on October 4 and 5, 2022, and documented in IR2022-046.

Previous WEP noncompliance addressed:

The following noncompliance with requirements identified in IR2022-046 were noted to be addressed since the October 4 and 5, 2022 inspection.

- Rock lined ditch at approximately KP154+700 has been completed.
- A sediment fence has been installed along WL0733 at approximately KP148+525.



Photo 1: overview of sheet pile walls intercepting waterbars at approximately KP155+550, looking hichain. Waterbars do not penetrate the sheet pile with exception of lowermost waterbar on either side of watercourse and will not function as prescribed by the ESCP.



Photo 2: Sheet pile walls intercepting waterbar at approximately KP155+675. Note lack of opening in sheet pile wall.

The observations noted at the time of the inspection provide evidence of non-compliance with the requirement to implement the WEP. Officer Parks discussed the non compliance with CGL staff in the field and noted that an subsequent inspection would be held with no notice to confirm that the issues had been addressed. See IR2022-055 for results of that reinspection.

**Compliance Determination:** Out – Notice of Non-Compliance

**Requirement 2:**

Order EN2022-028 (Appendix 6) specifies that:

- 1) Construction may not occur in any Identified Area unless in full compliance with an Approved WEP or Approved amended WEP, or as otherwise provided for in the Agreement.
- 2) The Certificate Holder must cease all variations from an Approved Work Execution Plan that are not in accordance with the Agreement.
- 3) The Certificate Holder must cease installation of Measures that are not as specified in the Work Execution Plans.
- 4) The Certificate Holder must complete the actions identified in clauses 1 through 3 of this Order to the satisfaction of EAO C&E.

**Findings:**

On October 29, 2022, Officer Parks observed active construction within an identified area included in the WEP for KP154+000 to 157+000. Crews were observed driving sheet pile, repositioning sheet pile equipment, welding, and operating heavy equipment (Photo 3). On October 28 and 29 EAO C&E documented noncompliance with WEP requirements within WEP KP154+000 to 157+000 (See Requirement 1). Clause 1 of EN2022-028 states that construction may not occur within any Identified Area unless in full compliance with an Approved WEP.



Date & Time: Sat, Oct 29, 2022, 14:02:23 PDT  
 Position: 10 N 552639 6092068 ( $\pm 7.1$  m)  
 Altitude: 902m ( $\pm 12.0$  m)  
 Datum: WGS-84  
 Azimuth/Bearing: 144° S36E 2560mils True ( $\pm 12^\circ$ )  
 Elevation Grade: +008%  
 Horizon Grade: +001%  
 Zoom: 2.0X  
 active work

Photo 3: Active construction in WEP KP154+000 to KP157+000, October 29, 2022. Note photograph UTM for location.

**Compliance Determination:** Out – Notice of Non Compliance

**Actions Required by Certificate Holder & Additional Comments**

None at this time.

**Enforcement Summary**

EAO C&E MAY INSPECT TO DETERMINE IF THE COASTAL GASLINK PIPELINE PROJECT HAS BEEN BROUGHT BACK INTO COMPLIANCE WITH THESE REQUIREMENTS. CONTINUED NON-COMPLIANCE WITH THESE REQUIREMENTS MAY RESULT IN ADDITIONAL ENFORCEMENT UNDER THE ENVIRONMENTAL ASSESSMENT ACT.

**Regulatory Considerations**

The noncompliance identified in this record have been substantially addressed at the time of drafting, as documented in EAO Inspection Record IR2022-055.

**Inspection Conducted by**

  
 Chris Parks  
 Deputy Director, Compliance and Enforcement

<b>Date Preliminary Report Sent to Certificate Holder</b>	<b>2022-12-05</b>
<b>Date Finalized</b>	<b>2023-01-05</b>

<b>Appendices</b>	
Appendix 1 Environmental Assessment Certificate # E14-03 Appendix 2 Schedule A Appendix 3 Schedule B Appendix 4 Certificate E14-03 (Amendment) Appendix 5 - 2022-07-14_EA Act s55 Compliance Agreement Appendix 6- Order EN2022-028 Appendix 7 Final - CGL_2022-10-03 to 06_Inspection Record_IR2022-046 Appendix 8 WEP 154+000 to KP 157+000 Appendix 9 WEP KP146+200 to 149+200	
<b>Environmental Assessment Office - Compliance &amp; Enforcement Branch</b>	
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