

<b>Project Name</b>	Coastal GasLink Pipeline Project (CGL)	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	E14-03	<b>Inspection No.</b>	20230019_IR001
<b>Project Status</b>	Certified	<b>Inspection Start</b>	2023-04-05
<b>Officer Name</b>	Shayla Frechette (Frechette)	<b>UTM</b>	10N 551564 6087217
<b>Trigger</b>	Planned Inspection	<b>Inspection Type</b>	Field and Administrative
<b>Project Description</b>	The Coastal GasLink Pipeline Project (Project) is an approximately 650 kilometre (km) long natural gas pipeline connecting facilities in northeast British Columbia (B.C.) to the LNG Canada facility near Kitimat.		
<b>Location Description</b>	The Project is near Groundbirch (40 km west of Dawson Creek) in northeast B.C. to the LNG Canada facility near Kitimat.		
<b>Inspection Summary</b>	<p>The Project was in Construction at the time of inspection.</p> <p>Officer Frechette inspected against field and administrative project requirements.</p> <p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> <li>1. Condition 10 with respect to traffic speed limits during critical timing widows for Caribou;</li> <li>2. Condition 10 with respect to Caribou sightings and reporting;</li> <li>3. Condition 10 with respect to Caribou barriers;</li> <li>4. Condition 14 with respect to Beaver dam removal permits;</li> <li>5. Condition 15 with respect to website project updates;</li> <li>6. Condition 26 with respect to waste and debris management;</li> <li>7. Condition 26 with respect to storm water management around watercourses; and,</li> <li>8. Compliance Agreement and Enforcement Order EN2022-028, Work Execution Plan (WEP) for Identified Area KP 381+320 to 381+690 with respect to the implementation of erosion and sediment control measures.</li> </ol> <p>On April 21, 2023, Officer Frechette provided the preliminary inspection record to the Certificate Holder.</p> <p>On May 10, 2023, the Certificate Holder provided comments pertaining to the preliminary inspection record. These comments were reviewed and edits were made to the record by the EAO Compliance and Enforcement Branch (CEB) to correct identified errors of fact or omission prior to finalizing.</p> <p>Additional detail regarding these findings may be found in the sections below.</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 the EAO CEB.</p>		
<b>In Attendance</b>	CGL Environmental Construction Coordinator Lead Environmental Inspector CGL Erosion and Sediment Control Lead		

	SAEG Erosion and Sediment Control Lead Macro Foreman Macro Straw Macro Environmental Manager Macro CPESC (DWB) CGL Environmental Inspector CGL WP3 ESC Lead Community Monitor Construction Liaison
<b>Certificate Holder</b>	Coastal GasLink Pipeline Ltd.
<b>Mailing Address</b>	450 1st Street S.W. Calgary, AB T2P 5H1

**INSPECTION DETAILS**

<p><b>Requirement 1:</b></p> <p><b>Condition 10 of the EAC, Schedule B requires a Caribou Mitigation and Monitoring Plan</b> (See Appendix 1 for complete wording)  <b>Caribou Mitigation and Monitoring Plan</b> (Appendix 2)  <b>Table 6-2: Construction Phase- Mitigation for Works Planned to Occur During Critical Timing Windows for Caribou</b>                  January 15 to July 15 for Hart Ranges (KP 137.2 to 189.3)  <b>Project Related Traffic Management</b></p> <p>Speed limits will be established and enforced on all access used for the Project, per the Traffic Control Management Plan and contractors Traffic Management Plan. Generally, post winter speed limits of 80km/h on high grade roads and 60km/hr on secondary roads in UWR’s (BC OGC 2018), unless otherwise directed by an applicable transportation authority (i.e., adhere to the posted speed limits for a road if it is less than these speeds).</p>
<p><b>Findings:</b></p> <p>On April 5, 2023, EAO Officers noted Project specific speed limit signs posted along the Crocker Forest Service Road within the Ungulate Winter Range for the Caribou Hart Range (KP 137.2 to 189.3). CGL representatives stated that radar is used to monitor speeds and that all Project related vehicles are equipped with in-vehicle monitors, which track and record speeds (Photo 1).</p> <p>On April 6, 2023, Officer Frechette requested information on how the in-vehicle monitors work and how these are used for employee speed monitoring and how speed limits are enforced within the ungulate winter range.</p> <p>On April 18, 2023, CGL responded with the following information: <i>“In-vehicle monitoring systems (IVMS) are best-practice components of motor vehicle safety systems employed by industry to support worker safety. IVMS are electronic devices that are installed in vehicles and enable the collection and monitoring of vehicle data focused on certain factors regarding safety and performance of the driver and vehicle, with the objective of improving road safety performance. IVMS combine the use of automatic vehicle location in individual vehicles with software that collects fleet data for a comprehensive picture of vehicle location, speed and seat belt use.</i></p> <p><i>Coastal GasLink has established minimum requirements for safe driving operations on the Project that apply to all Prime Contractors and are intended to minimize motor vehicle accidents by encouraging safe driving practices. Coastal GasLink requires all Prime Contractors to include IVMS as part of their road safety management systems.</i></p>

*Each Prime Contractor then collects and administers IVMS data gathered based on their individual Safety programs.”*

And

*“All Prime Contractors are responsible to ensure their crew and subcontractors adhere to posted ROW speed limits and other provisions of the Traffic Control Management Plan.*

*The specifics of each Prime Contractor’s road safety management system may vary. As an example, it is Coastal GasLink’s understanding that the Prime Contractor for Construction Section 3 in WP2 has a radar-based speed enforcement program in place to monitor speed zones and enforce Project speed limits, including within UWR areas. Driving information and rules are also highlighted in safety memos and discussed with crews in work-site meetings.”*

The observations and information obtained provides evidence of compliance with speed limits in the Ungulate Winter Range.

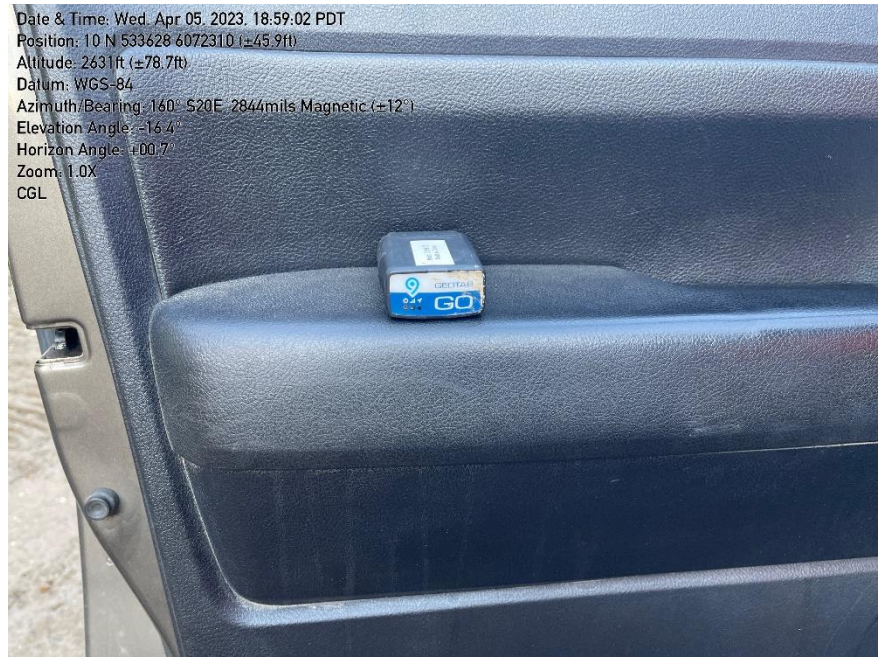


Photo 1: CGL in-vehicle monitor.

**Compliance Determination:** In

**Requirement 2:**

**Condition 10 of the EAC, Schedule B requires a Caribou Mitigation and Monitoring Plan** (See Appendix 1 of EAC, Schedule B for complete wording of Condition 10)

**Caribou Mitigation and Monitoring Plan** (Appendix 2)

**Table 6-2: Construction Phase- Mitigation for Works Planned to Occur During Critical Timing Windows for Caribou Wildlife Sightings**

Coastal Gaslink personal and contractors will record all caribou sightings during construction and operation.

Sightings will be compiled by the Environmental Inspector. Wildlife sighting information will be reported to BC MFLNRORD.

**Findings:**

During the inspection on April 5, 2023, Officer Frechette spoke with CGL representatives who noted that there have been three caribou sightings along the Right of Way (ROW) this year thus far. On April 6, 2023, Officer Frechette requested evidence of 2023 Hart Range Caribou sightings reported for BC Ministry of Forests (Formerly MFLNRORD, now FOR).

On April 18, 2023, CGL noted that there have been three Caribou sightings thus far in 2023 on the following dates: February 11, 2023, February 15, 2023 and February 28, 2023, which were submitted to BC FOR on February 15, 2023, February 23, 2023 and on March 1, 2023.

Additionally, CGL provided EAO CEB evidence of email submissions (Appendix 3).

The information obtained provides evidence of compliance with respect to Caribou sightings reported to BC FLNRORD.

**Compliance Determination:** In

**Requirement 3:**

**Condition 10 of the EAC, Schedule B requires a Caribou Mitigation and Monitoring Plan** (See Appendix 1 of EAC, Schedule B for complete wording of Condition 10)

**Caribou Mitigation and Monitoring Plan** (Appendix 2)

**Table 6-2: Construction Phase- Mitigation for Works Planned to Occur During Critical Timing Widows for Caribou Barriers to Caribou Movement during Construction**

Gaps in snow berms will be provided at least every 500m if snow berms reach higher than 1.5m (BC MECCS 2011) to allow wildlife movement. Gaps in snow berms will correspond to breaks in pipe, soil stockpiles and windrows, where applicable.

**Findings:**

On April 5, 2023, Officer Frechette and Smith inspected for snow gaps every 500 metres (m) at portions of the ROW between KP 160 and KP 190. It was noted that the soil stockpiles and snow piles that exceeded 1.5 m high along the ROW and Shoofly Road had periodic breaks, which were no longer than 500 m each stretch (Photo 2 and 3).

The observations during the inspection provide evidence of compliance with respect to gaps in snow berms.

Date & Time: Wed, Apr 05, 2023, 18:20:19 PDT  
Position: 10 N 548283 6083494 ( $\pm 53.5$ ft)  
Altitude: 2681ft ( $\pm 78.7$ ft)  
Datum: WGS-84  
Azimuth/Bearing: 221° S41W 3929mils Magnetic ( $\pm 15^\circ$ )  
Elevation Angle: +01.9°  
Horizon Angle: -02.2°  
Zoom: 1.0X  
CGL



Photo 2: Snow piled along ROW approximately 450 m long.

Date & Time: Wed, Apr 05, 2023, 18:06:01 PDT  
Position: 10 N 551513 6087621 ( $\pm 15.6$ ft)  
Altitude: 2995ft ( $\pm 11.0$ ft)  
Datum: WGS-84  
Azimuth/Bearing: 181° S01W 3218mils Magnetic ( $\pm 15^\circ$ )  
Elevation Angle: -01.4°  
Horizon Angle: -00.5°  
Zoom: 1.0X  
CGL 160



Photo 3: Gap in snow berm along ROW.

**Compliance Determination:** In

**Requirement 4:**

**Condition 14 of the EAC, Schedule B requires Wildlife and Wildlife Habitat Management Plan (See Appendix 1 of EAC, Schedule B for complete wording of Condition 14)**

**Wildlife and Wildlife Habitat Management Plan (Appendix 4)**

**Table 4-1: Summary of Mitigation for Wildlife and Wildlife Habitat**

**Section 21. Beaver**

If beaver dams or lodges will be disturbed, obtain a Wildlife Sundry Permit for beaver dam removal from the relevant regulatory agency to remove a beaver dam or lodge.

**Findings:**

On April 3, 2023, Officer Frechette inquired if any beaver dams had been removed thus far in 2023 between KP160 to KP190. CGL confirmed with Officer Frechette that there were no beaver dam removals during 2023 between the requested range.

EAO CEB will continue to inspect against this requirement in the future to verify compliance.

**Compliance Determination:** Not Determined

**Requirement 5:**

**Condition 15 of the EAC, Schedule B requires an Access Control Management Plan (ACMP) (See Appendix 1 of EAC, Schedule B for complete wording of Condition 15)**

**Access Management Plan (Appendix 5)**

**Section 2.2 Construction Phase**

During construction, Coastal GasLink will provide information on the Project through updates to the Project website ([www.coastalgaslink.com](http://www.coastalgaslink.com)). Interested individuals and groups will be able to contact Coastal GasLink by email ([coastalgaslink@tcenergy.com](mailto:coastalgaslink@tcenergy.com)) or by telephone (1-855-633-2011) with questions or concerns regarding the Project, including the ACMP.

**Findings:**

Officer Frechette conducted an administrative review of the CGL website and noted a tab called “what’s new”, which had up to date information on monthly construction updates, milestones, photographs, videos and a website link to other related information. Additionally, the website included a “newsletter signup” and a “get construction updates” signup where the public can subscribe for construction updates. Officer Frechette also noted contact information including phone numbers, a fax number and an email address (Photo 4).

The information obtained during the website review provides evidence of compliance with respect to public information.

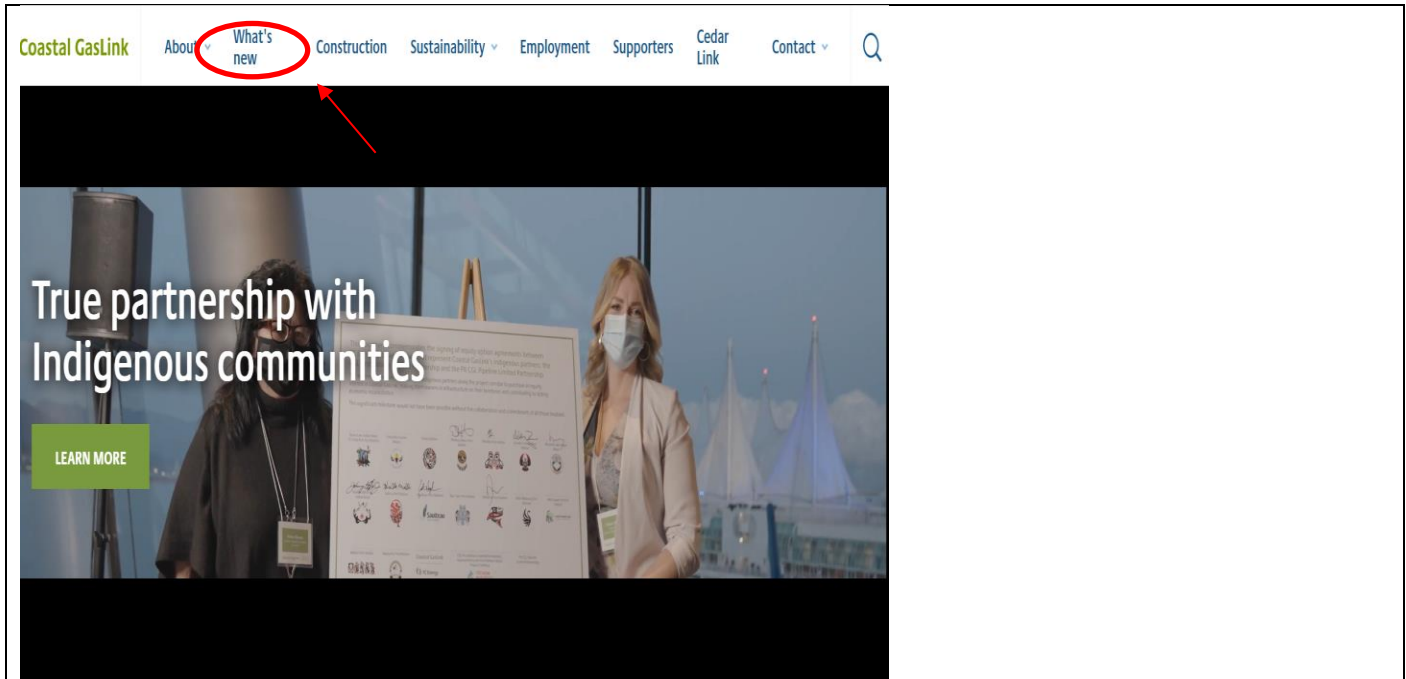


Photo 4: Photo of Coastal GasLink website.

**Compliance Determination:** In

**Requirement 6:**

**Condition 26 of the EAC, Schedule B requires an Environmental Management Plan** (See Appendix 1 of EAC, Schedule B for complete wording of Condition 26)

**Environmental Management Plan** (Appendix 6)

Each construction site will be equipped with adequate garbage receptacles for solid non-hazardous wastes and debris. These materials will be collected as required and disposed of at approved locations.

**Findings:**

On April 5, 2023, Officer Frechette and Smith inspected the ROW at KP 212, which had recently been reclaimed. Officers noted waste including, hard plastics, fabrics, wire, screws, paper, rope, bags, signs, flagging tape and recyclables scattered along the ROW between the roll back logs (Photo 5).

The observations noted at the time of the inspection provide evidence of non-compliance with respect to non-hazardous construction waste disposal.



Photo 5: Fabric and plastic construction waste left on reclaimed ROW.

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

**Requirement 7:**

**Condition 26 of the EAC, Schedule B requires an Environmental Management Plan** (See Appendix 1 of EAC, Schedule B for complete wording of Condition 26)

**Environmental Management Plan** (Appendix 6)

**Section 8- Vehicle Crossings**

Ensure stormwater from the bridge deck, side slopes and bridge approaches is directed away from the watercourse onto a well-vegetated area.

**Findings:**

On March 15, 2023, Officer Frechette inspected Shoofly Road 15 and observed watercourse crossing BR218 at KP 185 + 746. The melting snow appeared to be plowed and pushed next to the bridge approaches rather than away from the watercourse. It was also noted that melting, dirty snow was pushed over the bridge approaching wing walls into the forested area next to the ditch, which flowed towards the watercourse (Photo 6 to 8).

The observations during the inspection provide evidence of non-compliance with respect to stormwater management near to watercourses.





Photo 6: Dirty melting snow pile next to stream crossing and ditch directed towards watercourse.



Photo 7: Dirty melting snow piled next to bridge crossing.



Photo 8: Dirty melting snow pile next to watercourse and ditch directed towards watercourse.

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

**Requirement 8:**

**Compliance Agreement Under Section 55 of the Environmental Assessment Act (Appendix 7)**

**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.

**Schedule B – Identified Areas**

The following kilometer point (KP) ranges are Identified Areas for the purposes of this Agreement:

KP 381+320 to 381+690 (Appendix 8)

**Environmental Assessment Act, 2018, Order Under Section 53(1)**

**Enforcement Order EN2022-028, October 14, 2022 (Appendix 9)**

- 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.

**Findings:**

On January 9, 2023, CGL submitted an amendment for WEP KP 381+320 to 381+690 to EAO CEB. On January 12, 2023, EAO CEB approved the amendment to the WEP. On April 4, 2023, CGL submitted a “field fit” for this location.

On April 6, 2023, Officer Frechette inspected the ROW and noted that mechanical construction was recently completed. Construction crews noted that work is now complete for the area until June when crews will complete final clean up.

Officer Frechette noted the following as examples of what was observed in the field versus the site-specific erosion and sediment control plan (SSESCP) included in the WEP.

Examples of deviations from WEP include:

- KP381+350 to 381+575 - Missing seven correctly installed straw wattles on northeast side of ROW along cross ditch as specified by the SSECP (Photo 9 to 12);
- KP381+350 to 381+575 - Missing rock lined feature on northeast side of ROW along north to south ROW cross ditch prior to entering the east to west drainage ditch as specified by the SSECP (Photo 9 to 12); and,
- KP381+575- Topsoil piles lacking wattles at base of storage piles at bottom of slope (Photo 13).

The observations noted at the time of the inspection provide evidence of non-compliance with respect to the implementation of the WEP and EN2022-028.

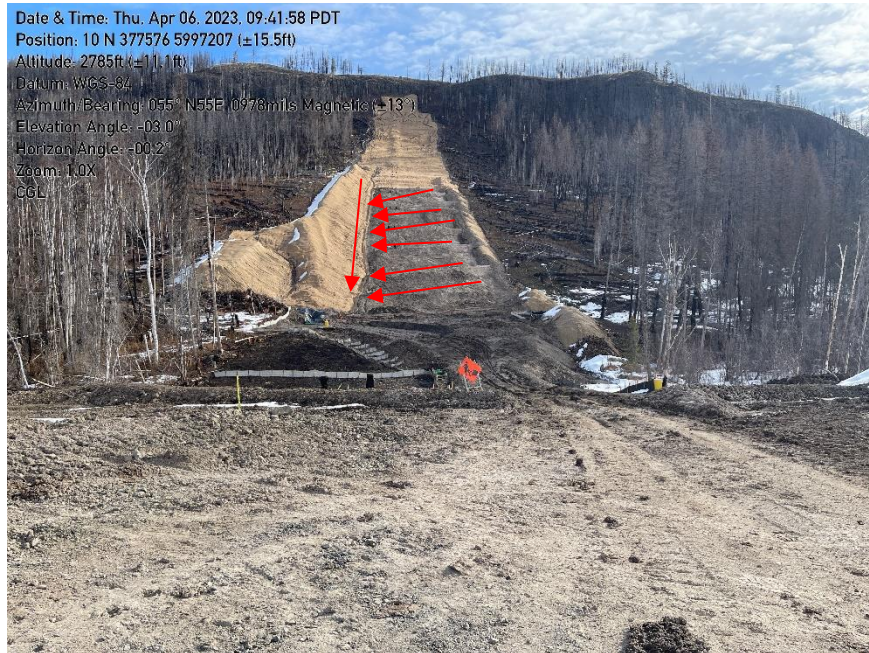


Photo 9: View of cross ditches.



Photo 10: Cross ditch missing correctly installed straw wattles and missing rock lined feature.



Photo 11: Cross ditch missing straw wattles and missing rock lined feature.




Photo 12: Cross ditch missing straw wattles and missing rock lined feature.



Photo 13: Soil stockpile cover in need of maintenance and missing straw wattles around base.

**Compliance Determination:** Out - Referred to Administrative Penalty

<b>Actions Required by Certificate Holder &amp; Additional Comments</b>	
None at this time.	
<b>Enforcement Summary</b>	
Requirement 8 has been referred to a Decision Maker for an Administrative Penalty.	
<b>Regulatory Considerations</b>	
None at this time.	
<b>Inspection Conducted by</b>	
 Shayla Frechette Senior Compliance & Enforcement Officer	<b>Date Preliminary Record Sent to Certificate Holder</b> <b>2023-04-21</b>
	<b>Date Finalized</b> <b>2023-05-19</b>
<b>Appendices</b>	
Appendix 1- Schedule B Appendix 2- CGL-Caribou Mitigation and Monitoring Plan (Rev 5-Oct2021) Appendix 3- Emails to BC FLNRORD for caribou sightings Appendix 4- CGL-Wildlife and Wildlife Habitat Management Plan (Rev 5-Sept2021) Appendix 5- CGL-Access Control Management Plan (Rev 5-Sept2021) Appendix 6- CGL-Environmental Management Plan (Rev 5-Sept2021) Appendix 7- 2022-07-14_CGL Compliance Agreement Appendix 8- KP381+320 to KP 381+690 WEP Appendix 9- EN2022-028_Coastal GasLink_CGL WEP Order	
<b>Environmental Assessment Office - Compliance &amp; Enforcement Branch</b>	
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