

<b>Project Name</b>	Coastal GasLink Pipeline Project	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	E14-03	<b>Inspection No.</b>	20230076_IR001
<b>Project Status</b>	Certified - construction	<b>Inspection Start</b>	2023-11-07
<b>Officer</b>	Smith	<b>UTM</b>	10U 556797 6105580 to 9U 592948 6009169
<b>Trigger</b>	Planned Inspection	<b>Inspection Type</b>	Field
<b>Project Description</b>	The Coastal GasLink Pipeline Project (Project) is an approximately 650-kilometre natural gas pipeline connecting facilities in northeast British Columbia to the LNG Canada facility near Kitimat.		
<b>Location Description</b>	The Project initiates near the community of Groundbirch and terminates near Kitimat. This inspection covered activities between approximately Kilometre Post (KP)140 and KP 573 of the pipeline.		
<b>Inspection Summary</b>	<p>From November 7 to 9, 2023, the Officer and the Deputy Director of the Compliance and Enforcement Branch (CEB) inspected the Project right-of-way (RoW) between KP 140+100 to 573+000. The primary focus was to assess the implementation of the Work Execution Plans (WEP) prior to the winter season. The inspection included a debrief of observations at the end of each day with Project staff via telephone.</p> <p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> <li>1. Condition 26 with respect to disposing of waste material in accordance with provincial regulations.</li> <li>2. Condition 26 with respect to streambank protection and reclamation following construction.</li> <li>3. Condition 26 with respect to streambank restoration using willows.</li> <li>4. The Compliance Agreement with respect to implementation of erosion and sediment control measures specified in the WEP for KP 140+200 to 143+200 and KP 149+200 to 154+000.</li> <li>5. The Compliance Agreement with respect to implementation of erosion and sediment control measures specified in the WEP for KP 381+200 to 381+600.</li> <li>6. The Compliance Agreement with respect to implementation of erosion and sediment control measures specified in the WEP for KP S_13+020 to S_13+120.</li> </ol> <p>This record was not provided to the Certificate Holder prior to finalizing. Therefore, no comments were received from the Certificate Holder prior to finalizing the record.</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>	None		
<b>Certificate Holder</b>	Coastal GasLink Pipeline Ltd.		
<b>Mailing Address</b>	450 1st Street SW, Calgary, AB, T2P 5H1		

**INSPECTION DETAILS**

**Requirement 1: Condition 26 of the Schedule B**

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application.

\*See Appendix 1 for full wording of the Condition.

**Environmental Management Plan – Section 8 – Pipeline Construction**

**8.1.3 Specific Measures – Waste Disposal**

- The Contractor will collect all construction debris and other waste materials and dispose of daily at an approved facility and in accordance with the Chemical and Waste Management Plan (Appendix D.1) and the Spill Contingency Plan (Appendix C.1) unless otherwise authorized by the Environmental Inspector(s)

**Chemical and Waste Management Plan**

**D.1.4 Mitigation – Waste Disposal**

All waste materials will be disposed of in accordance with federal and provincial legislation and municipal/regional regulations as required

**Findings:**

During the inspection on November 9, 2023, EAO CEB observed the disposal of construction related wood waste including rig-mats through burning adjacent to the pipe-storage yard near KP 166+100. Following the inspection, EAO CEB requested the Certificate Holder provide documentation (*Environmental Management Act* (EMA) Authorization (#AA-11548)) that allows for the disposal of rig-mats through burning.

On November 28, 2023, the Certificate Holder responded to EAO CEB’s request and provided waste discharge Approvals issued under the EMA for the “discharge of contaminants from burn piles located along the pipeline corridor of sections 3 & 4 of the Coastal GasLink Pipeline project”. The Authorization was provided to the Project by the relevant regulatory authority and covers the area of the Project where waste discharge through burning was observed by EAO CEB; Section 3. The Authorization allows for the following material to be combusted: wood based materials, untreated SPF construction wood debris consisting of damaged skids, beams, blocks, wooden spools, pallets, access mats and rig mats.



Photo 1. Burn piles observed by EAO CEB on November 9, 2023, near KP 166+100.



Photo 2. Burn piles observed by EAO CEB on November 9, 2023, near KP 166+100.

The documentation provided by the Certificate Holder through the information request process provides evidence of compliance with the requirement to dispose of all waste materials in accordance with federal and provincial legislation and municipal/regional regulations as required, at the pipe-storage area adjacent to roughly KP 166+100.

**Compliance Determination:** In

**Requirement 2: Condition 26 of EAC E14-03, Schedule B**

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application.

\*See Appendix 1 for full wording of the Condition.

**Environmental Management Plan, Section 8.6 Backfill**

**8.6.3 Specific Measures**

**Drainage patterns.** Regrade after backfilling to reclaim natural drainage patterns and remove potential barriers or conduits to water flow.

**Bank Protection and Reclamation.** Return the bed and banks of each watercourse to as close as practical to their original construction preparation contours. Do not realign or straighten watercourses or change their hydraulic characteristics.

**Findings:**

During the inspection, watercourse crossing reclamation work was inspected.

EAO CEB's observations at KP 171+231, which is labeled as a fish-bearing stream with a watercourse crossing number of J234.99, document that the pipe has been installed through the crossing, the travel lane has been removed and streambanks adjacent to the channel have been reinstated.

The re-constructed channel has large substrate consisting primarily of cobble placed in a manner that limits the channel's profile. Flow through this area of the channel was observed to be within the spaces between the cobble itself; the lack of a defined channel profile limited the channel's depth through the portion of the stream that crosses the Project RoW. Flowing water was noted within the channel immediately upstream and downstream of the pipeline RoW. However, open flowing water was not observed at the crossing itself. The lack of a channel profile and channel depth through the re-established portion of the feature may cause fish passage restrictions.





Photo 3. Watercourse number J234.99 looking upstream to downstream - overview.



Photo 4. Watercourse number J234.99 looking upstream to downstream – mid crossing channel.





Photo 5. Watercourse number J234.99 looking downstream to upstream.



Photo 6. Watercourse number J234.99 looking downstream at the bottom end of the crossing.

The observations made by EAO CEB on November 9, 2023, at KP 171, 231 (watercourse number J234.99) appear to provide evidence of non-compliance with the requirements referenced above regarding drainage patterns and bank protection and reclamation.

**Compliance Determination:** Out - Warning - Refer to Enforcement Summary

**Requirement 3: Condition 26 of EAC E14-03, Schedule B**

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 25 and Appendix 2A of the Application.

\*See Appendix 1 for full wording of the Condition.

**Coastal GasLink, Environmental Management Plan, Section 8.4 – Watercourse Crossings (Appendix 8)**

**Section 8.4.3 Specific Measures**

**Bank Protection and Reclamation**

Implement permanent bank reclamation measures to re-establish riparian vegetation and fish habitat as a part of backfill operations (Refer to Appendix B, Dwgs. STDS-03-ML-05-601, STDS-03-ML-05-602, STDS-03-ML-05-603, STDS-03-ML-05-604, **STDS-03-ML-05-606**, STDS-03-ML-05-607, and STDS- 03-ML-05-608).

**Drawing STDS-03-ML-05-606 – Streambank Reclamation Vegetated Geotextile Installation (Appendix 7)**

- Willows should be harvested as close to installation as possible, preferably the previous day but no more than 2 days early. Willows should be 1.5 cm to 2.5 cm in diameter and 2.0 m to 3.0 m long with no more than 25 cm left exposed.
- Planting rate should be approximately 1 stem per 15.0 cm (6 inches roughly).

**Findings:**

During the inspection, EAO CEB viewed the willow installation used for bank reclamation at select crossings. The willow stakes inspected were primarily less than 1.5 to 2.5 centimeters (cm) in diameter, were less than 2 to 3 metres (m) long and most often had more than 25 cm of the stake left exposed. See the below photos for examples at the crossings located at roughly KP 158+300 and 171+050.



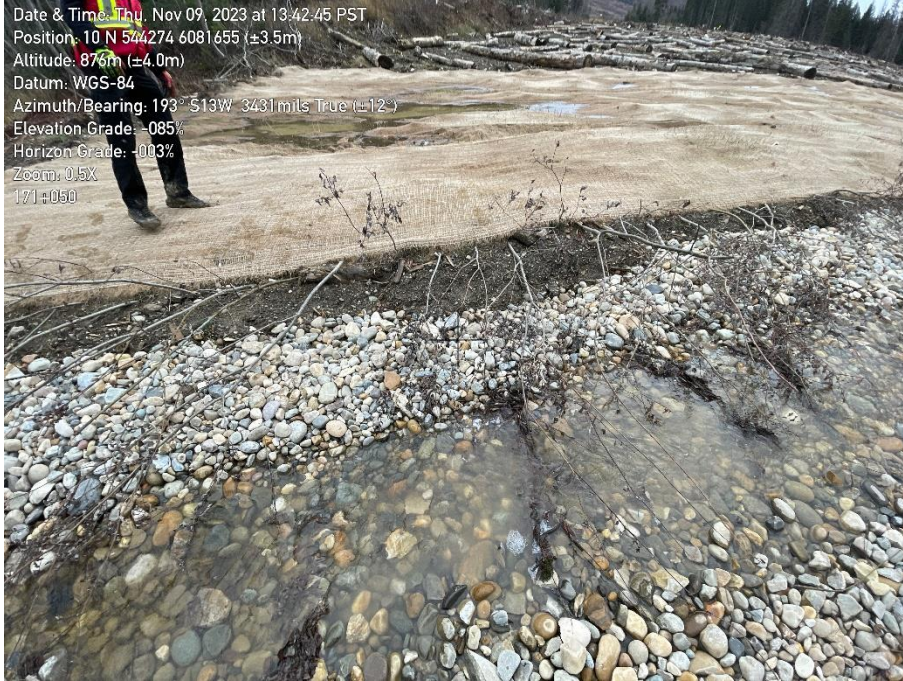


Photo 7. Overview of willow staking at the watercourse crossing at KP 171+050.



Photo 8. Close-up of willow staking at the watercourse crossing at KP 171+050.





Photo 9. Close-up of willow staking at the watercourse crossing at KP 171+050.



Photo 10. Willow staking at the watercourse crossing of KP 158+300 (approximately).

The above observations provide evidence of non-compliance with the bank protection and reclamation requirement within the Environmental Management Plan specific to willow staking.

**Compliance Determination:** Out - Warning - Refer to Enforcement Summary



**Requirement 4: Compliance Agreement Under Section 55 of the *Environmental Assessment Act* (Appendix 2)**

**Section 2.4 Compliance Obligations – 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 [erosion and sediment control] risks to ESRs [environmentally sensitive receptors] 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 140+195 to 149+900

KP 149+900 to 154+800

**Work Execution Plan 140+200 to 143+200** (Appendix 3)

**Work Execution Plan 149+200 to 154+000** (Appendix 4)

**Findings:**

On November 7, 2023, EAO CEB inspected the Project RoW between KP 140+200 to 143+200 and KP 149+200 to 154+000 against the currently approved WEPs (Appendix 3 and Appendix 4). Works were not active at the time of the inspection. The pipe had previously been installed and backfilled through the area.

Erosion and sediment control measures observed include cover management, diversion berms, sediment fence and perimeter controls such as rock lined ditching. See the below photos for examples of the observations made on November 7, 2023.



Photo 11. KP 141+100 approximately. Perimeter controls and cover management per the WEP.





Photo 12. KP141+100 approximately. Close up of wood mulch used as cover management.



Photo 13. KP 151+100 approximately. Overview of RoW looking towards high-chain. Measures installed per the WEP.

The observations and findings provide evidence that the Project is compliant with Section 2.4(2) of the Compliance Agreement with respect to implementation of ESC measures specified in the WEPs for KP 140+200 to 143+200 and KP 149+200 to 154+000.



**Compliance Determination:** In

**Requirement 5: Compliance Agreement Under Section 55 of the *Environmental Assessment Act* (Appendix 2)**

**Section 2.4 Compliance Obligations – 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

**Work Execution Plan KP 381+200 to 381+600 (Appendix 5)**

**Findings:**

On November 8, 2023, EAO CEB flew portions of the Project using a helicopter. During the inspection, EAO CEB reviewed the WEP between KP 381+200 to 381+600 (Appendix 5). Works were not active at the time of the inspection as the pipe had been installed and the area had moved to the final clean-up stage, with final clean-up completed.

EAO CEB observed measures in the field installed as per the final clean-up portion of the WEP. These measures included a series of offtake diversion berms, which are lined with erosion control product, rollback using woody debris and cover management using seed. See the below photos for examples of the observations made on November 8, 2023, near KP 381.



Photo 14. Overview of KP 381 as seen from the air on November 8, 2023. Final clean-up completed.





Photo 15. Overview of KP 381 as seen from the air on November 8, 2023. Final clean-up completed.



Photo 16. Overview of KP 381 as seen from the air on November 8, 2023. Final clean-up completed.

The observations and findings provide evidence that the Project is compliant with Section 2.4(2) of the Compliance Agreement with respect to implementation of erosion and sediment control measures specified in the WEP for KP 381+200 to 381+600.



**Compliance Determination:** In

**Requirement 6: Compliance Agreement Under Section 55 of the *Environmental Assessment Act* (Appendix 2)**

**Section 2.4 Compliance Obligations – 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

**Work Execution Plan KP S\_13-020 to S\_13+120 (Appendix 6)**

**Findings:**

On November 8, 2023, EAO CEB flew portions of the Project using a helicopter. During the inspection, EAO CEB reviewed the WEP between KP S\_13+020 to S\_13+120 (Appendix 6). Works were not active at the time of the inspection as the pipe had been installed and final clean-up had been completed through the area.

EAO CEB observed measures in the field installed as per the phase 2 WEP, which covers final clean-up. These measures included diversion berms, which are lined with erosion control product, rollback using woody debris and cover management at the watercourse crossing. See the below photos for examples of the observations made on November 8, 2023, near KP S\_13.



Photo 17. Overview of KP S\_13 as seen from the air on November 8, 2023. Looking high chain towards KP S\_13+050 watercourse crossing. Final clean-up completed.





Photo 18. Overview of KP S\_13 as seen from the air on November 8, 2023. Looking at the watercourse crossing at KP S\_13+050. Final clean-up completed.



Photo 19. Overview of KP S\_13 as seen from the air on November 8, 2023. Looking low chain at the watercourse crossing at KP S\_13+050. Final clean-up completed.

The observations and findings provide evidence that the Project is compliant with Section 2.4(2) of the Compliance Agreement with respect to implementation of ESC measures specified in the WEP for KP S\_13+020 to S\_13+120.

**Compliance Determination:** In

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

None at this time.

**Enforcement Summary**

**COASTAL GASLINK PIPELINE LTD. IS WARNED THAT THE PROJECT IS NOT COMPLIANT WITH CONDITION #26 OF EAC# E14-03. SEE APPENDIX 9 FOR A LETTER OF WARNING FOR THE NON-COMPLIANCES.**

**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. SEE REGULATORY CONSIDERATIONS SECTION FOR ADDITIONAL INFORMATION.**

**Regulatory Considerations**

None at this time.

**Inspection Conducted by**

Clayton Smith Senior Compliance & Enforcement Officer	<b>Date Preliminary Record Sent to Certificate Holder</b> N/A
	<b>Date Finalized</b> 2024-01-02

**Appendices**

- Appendix 1: Environmental Assessment Certificate # E14-03
- Appendix 2: 2022-07-14\_CGL Compliance Agreement
- Appendix 3: WEP\_KP140+200-143+200\_Rev07-A\_Winterization
- Appendix 4: WEP\_KP149+200-154+000\_Rev04-B\_Winterization\_2023-11-04
- Appendix 5: 2023-06-26 ESC WEP KP381-200 to KP381-600 R0 IFU - signed
- Appendix 6: WP3\_Central\_Phase\_2\_WEP\_13+020\_-\_13+120\_15+800\_-\_16+100
- Appendix 7: Drawing STDS-03-ML-05-606 – Streambank Reclamation Vegetated Geotextile Installation
- Appendix 8: CGL-Environmental Management Plan (Rev 5-Sept2021)
- Appendix 9: Coastal GasLink\_Warning Letter\_20230076\_WN001

**Environmental Assessment Office - Compliance & Enforcement Branch**

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