

Project Name	Prince Rupert Gas Transmission Project	Inspection Status	Final
EA Certificate #	E14-06	Inspection No.	20240051_IR001
Project Status	Certified - construction	Inspection Start	2024-10-02
Inspection Type	Field and Administrative	Initiation	Planned Inspection
UTM	497060 E 6121905 N to 463791 E 6094970 N		
Project Description	The Prince Rupert Gas Transmission Project (Project) is a natural gas transmission pipeline and associated infrastructure. The Project includes up to 780 kilometres of land-based pipeline and up to 120 kilometres of twin marine pipelines.		
Location Description	The Project extends from the Hudson’s Hope area in northeast BC to Lelu Island, near Prince Rupert. This inspection covered Project activities in the Nass Area, northwest of Terrace. The UTM range listed above correspond to the extent of the right-of-way (ROW) inspected.		
Inspection Summary	<p>The Officer inspected the pipeline ROW and access development activities between kilometre-post (KP) 674 and 729. The inspection included a debrief of observations with Project staff on October 2, 2024.</p> <p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> 1. EAC Condition 1 with respect the submission of a pre-construction compliance report. 2. Condition 3 of Schedule B with respect to submitting a table of concordance to the EAO in advance of the commencement of construction. 3. Condition 16 of Schedule B with respect to camp fencing. 4. Condition 31 of Schedule B with respect to the development of a strategy to mitigate the risk of forest pest spread. 5. Condition 36 of Schedule B with respect to public notifications. 6. Condition 36 of Schedule B with respect to delineation and signage of environmentally sensitive features. 7. Condition 36 of Schedule B with respect to following up on the use of potential bat hibernacula or roosts in advance of clearing. 8. Condition 36 of Schedule B with respect to spill prevention equipment. <p>On November 14, 2024, Officer Lombardi provided the preliminary inspection record to the Certificate Holder.</p> <p>On November 21, 2024, 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 findings in this report reflect the analysis based on the information obtained during the inspection commenced on the date noted above. These findings can</p>		

	change at any time upon information gathered through future inspections or if new information is obtained by the EAO CEB.
In Attendance	Lead Environmental Inspector, Western LNG Aquatics QP, Western LNG Lands Officer, Nisga’a Lisims Government
Certificate Holder	Prince Rupert Gas Transmission Ltd.
Mailing Address	101-4441 Lakelse Avenue, Suite 1A, Terrace, BC V8G 1P1
Inspecting Officer(s)	Christie Lombardi Senior Compliance & Enforcement Officer
Record Prepared By:	Christie Lombardi Senior Compliance & Enforcement Officer
Record Approved By	Chris Parks Deputy Director, Compliance & Enforcement

INSPECTION DETAILS

<p>Requirement 1: Condition 1 of EAC# E14-06 (Appendix 1)</p> <p>The Holder must submit a report to EAO Compliance and Enforcement staff on the status of compliance with the conditions of this Certificate, and the conditions in Schedule B, at the following times:</p> <ul style="list-style-type: none"> a. one month prior to substantially starting construction of any of the Project facilities; 	
<p>Findings:</p> <p>On July 23, 2024, the Certificate Holder submitted a pre-construction compliance self-report to EAO CEB (Appendix 3). The report presents a status of compliance and associated activities for all the conditions in Environmental Assessment Certificate (EAC) # E14-06 as well as the conditions in Schedule B to the EAC. The report was submitted one month before the Project commenced construction on August 24, 2024.</p> <p>This information provides evidence of compliance with EAC Condition 1 with respect to the submission of a pre-construction compliance self-report.</p>	
Compliance Finding	In
Enforcement Action	Not Applicable

<p>Requirement 2: Condition 3 of EAC# E14-06 Schedule B (Appendix 2)</p> <p>The Holder must provide EAO with a table of concordance showing updated kilometre post (KP) locations including the revised longitude and latitude, and a corresponding map (i) 15 days prior to the Holder’s planned date to commence Construction;</p>	
<p>Findings:</p> <p>As noted in Requirement 1 above, the Project commenced construction on August 24, 2024. On July 3, 2024, the Certificate Holder made a Condition 3 submission to the EAO (Appendix 4), consisting of a table of concordance with KPs and coordinates and an updated Project map identifying the approved route amendments.</p>	

This information provides evidence of compliance with Condition 3 with respect to submitting a table of concordance to the EAO in advance of the commencement of construction.

Compliance Finding	In
Enforcement Action	Not Applicable

Requirement 3: Condition 16 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop, in consultation with FLNR and OGC, and implement a Human-Wildlife Conflict Plan to avoid or minimize direct wildlife mortalities as a result of Construction and Operations.

Human-Wildlife Conflict Plan (Appendix 5)

Table 5-1 Human-Wildlife Conflict Mitigation – Mortality Related to Food and Waste Handling

PRGT will install or implement the following:

- A 3–4 strand electric fence surrounding all camps
- Gate access
- The entire camp, including cooking, garbage, and waste water plants will be within the fenced area

Findings:

On October 2, 2024, the Officer inspected Sga Sgin’ist Lodge, the project accommodation camp near Nass Camp, which was in operation and housing approximately 80 workers. A multi-strand electric fence was observed around the perimeter of the camp (Photo 1) with an operational voltage confirmed by a handheld meter to be 6.2 kilovolts. The camp access gate was observed to be kept closed and no component of the camp was observed to be outside of the fenced area.

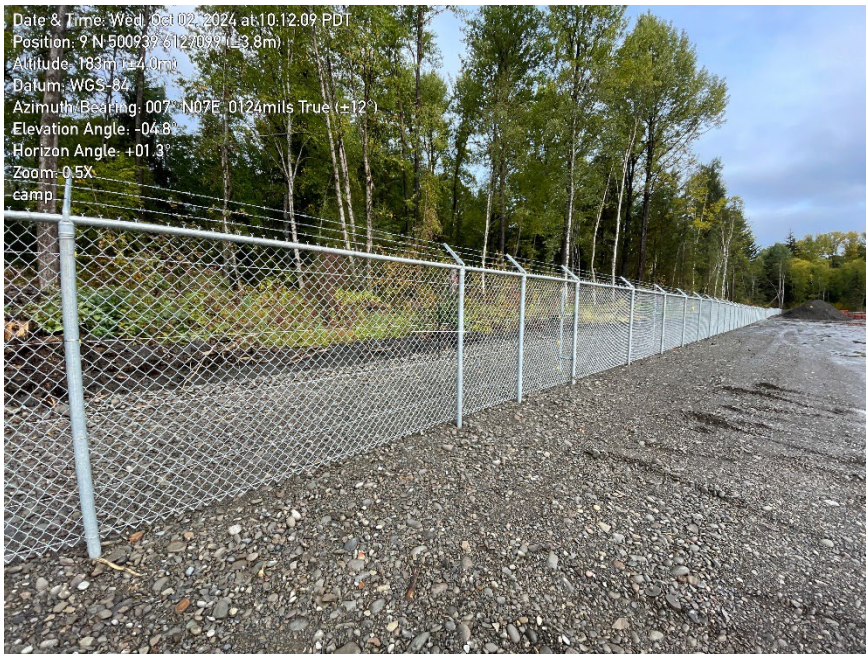


Photo 1. Electric fencing at Sga Sgin’ist Lodge accommodation camp.

These observations provide evidence of compliance with Condition 16 with respect to camp fencing.

Compliance Finding	In
Enforcement Action	Not Applicable

Requirement 4: Condition 31 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop, in consultation with FLNR and OGC, and implement a Timber Salvage Strategy that takes into account OGC’s *“Fibre Utilization Plan Guideline”*.

The Holder must obtain advice from a Qualified Professional regarding steps that must be implemented in respect of timber management and hauling practices and times to mitigate risk of forest pest spread.

Timber Salvage Strategy (Appendix 6)

Section 10.0 Forest Pest Management Strategy

Forest Pest Management Plans will be created prior to commencement of clearing activities on the Project areas and will apply to all construction phases of the Project, from pre-construction to clearing to reclamation.

These plans will provide strategic and operational guidance to mitigate the occurrence and spread of forest pests . . . In addition, the plans will provide strategies for monitoring and mitigating impacts to forest health from damage agents (including forest insects and pathogens) during construction on the ROW.

Findings:

As noted in Requirement 1 above, Project construction commenced on August 24, 2024. On October 23, 2024, the Certificate Holder provided the Officer with a copy of the Construction Forest Pest Management Plan relevant to the 2024 clearing program (Appendix 7), dated August 25, 2015, which was requested as part of the inspection.

The Construction Forest Pest Management Plan identifies a number of specific damage agents associated with pipeline clearing works, including beetles, root diseases, foliar diseases, and stem borers. Section 5 of the plan outlines mitigations and measures for detection and monitoring of each of the damage agents. The plan concludes that the potential expansion of project areas with forest health issues can be prevented or mitigated by adhering to the management strategies identified therein.

The Forest Pest Management Plan was prepared and reviewed by Registered Professional Biologists and Foresters whose professional registration status was confirmed by the Officer using online registrant directories on November 6, 2024 (Appendix 8).

This information provides evidence of compliance with Condition 31 with respect to the development of a strategy to mitigate the risk of forest pest spread.

Compliance Finding	In
Enforcement Action	Not Applicable

Requirement 5: Condition 36 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 36 of the Application and the draft EMP submitted to EAO on September 30, 2014.

Application for an Environmental Assessment Certificate (Appendix 9)

Section 36.1 Summary of Proposed Environmental and Operational Management Plans – Project-Specific Environmental Management Plan

The EMP will include requirements for:

- Notification of concerned parties

Construction Environmental Management Plan (Appendix 10)

Section 5.1 Notification of Concerned Parties - Introduction

Notification of the construction schedule and timing of specific construction activities will facilitate awareness of upcoming activities, and allow Aboriginal Groups, landowners including Nisga’a Nation and regulatory agencies to plan as appropriate for construction activities in their area.

Section 5.3 Public Notification

- PRGT will continue to provide information on the Project through a number of different ways, including updates to the Project website (www.princerupertgas.com), communication with local government staff and officials and distribution of PRGT’s monthly Project Activity Updates.

Findings:

On October 9, 2024, the Officer attempted to access the website www.princerupertgas.com noted in the Environmental Management Plan, but found it was not in use (Appendix 11). The Officer subsequently accessed the Western LNG website and found a web page (www.westernlng.com/projects/prince-rupert-gas-transmission-project) dedicated to the Project. The webpage contained a brief description of the Project and contact information for the BC Energy Regulator, noted as governing the Project. No Project updates or information regarding Project activities were present on the dedicated Project webpage (Appendix 12), nor was information on construction scheduling or the timing of specific construction activities was found on the broader Western LNG website.

On October 16, 2024, the Officer issued an information request to the Certificate Holder to confirm the address of the Project website used to notify the public of Project activities. On October 23, 2024, the Certificate Holder confirmed to the Officer the Project website as www.westernlng.com (Appendix 13). The Certificate Holder response further indicated that public notifications for the Project were targeted for the Nisga’a public and were posted on the Nisga’a Nation website, Nisga’a Nation Facebook account, and newsletters of the Nisga’a Nation. Given that Nisga’a Nation is one of a range of concerned parties on the Project, limiting public information to Nisga’a Nation social media and publications is not consistent with the requirements of the Construction Environmental Management Plan.

This information provides evidence of non-compliance with Condition 36 with respect to public notifications, as the Certificate Holder is not currently maintaining a Project website to provide construction information such as schedule and timing of specific construction activities as described in the Construction Environmental Management Plan.

Compliance Finding	Out
Enforcement Action	Notice of Non-compliance

Requirement 6: Condition 36 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 36 of the Application and the draft EMP submitted to EAO on September 30, 2014.

Construction Environmental Management Plan (Appendix 10)

Section 6.3 Construction Preparation – Specific Measures – Environmental Resource Delineation

- Clearly flag and mark all environmentally sensitive features (e.g., wetlands, watercourses, archaeological sites, mineral licks, amphibian breeding ponds, bear dens, stick nests, etc.) identified on the Environmental Alignment Sheets and environmental tables (Tables 7-1 and 7-1a) within the immediate vicinity of the ROW and Project facility sites before the start of clearing.
- Following clearing, install visual identification (e.g., snow fencing), to delineate the environmentally sensitive features (e.g., wetlands, watercourses, archaeological sites, mineral licks, amphibian breeding ponds, bear dens, stick nests, etc.)
- Supplement fencing with signage after clearing.

Findings:

On October 2, 2024, the Officer inspected the Project ROW at KP 726+500 (Photo 2, 3), which had been cleared.



Photo 2. Cleared Project ROW at KP 726+500 in highchain direction.



Photo 3. Cleared Project ROW at KP 726+500 in lowchain direction

Table 7-1a of the Construction Environmental Management Plan (Appendix 15), provided to the Officer by the Certificate Holder on October 1, 2024 and an excerpt of which is presented in Requirement 7 below, identifies a potential bat hibernaculum or roost located between approximately KP 726+359 to 608 with feature number W_262. This feature is also indicated on the Environmental Alignment Sheets the Certificate Holder provided to the Officer on January 22, 2025 (Appendix 14).

The Officer observed feature W_262 at the edge of the cleared ROW, approximately in the centre of the Certified Pipeline Corridor. The feature was not delineated and there was no signage the ROW, only a few pieces of pink flagging tape were observed (Photo 4). Signage associated with a buffer and speed limit mitigation for the potential hibernaculum was observed on the road adjacent to the ROW (Road 24/Iskheenickh Road), which is on the opposite of the ROW from the potential hibernaculum and separated from the ROW by a vegetation buffer. This sign was not visible from the ROW or while in the direct vicinity of the potential hibernaculum (Photo 5).



Photo 4. Location of potential bat hibernaculum W_262 on the Project ROW, marked only with flagging tape.



Photo 5. Road signage for potential bat hibernaculum W_262, not visible from the Project ROW.

Further observations by the Officer during the inspection in the vicinity of KP 726 identified that the placement of signage for environmental features on the road, rather than the ROW, as a common practice in the area.

These observations provide evidence of non-compliance with Condition 36 with respect to delineation and signage of environmentally sensitive features.

Compliance Finding	Out
Enforcement Action	Warning Letter

Requirement 7: Condition 36 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 36 of the Application and the draft EMP submitted to EAO on September 30, 2014.

Construction Environmental Management Plan (Appendix 10)

Section 7.1 Project Specific Protection Measures - Introduction

The location of features that require site-specific mitigation are indicated on the Environmental Alignment Sheets and included in the Resource-Specific Mitigation Tables (Table 7-1 and Table 7-1a).

Table 7-1a Resource-Specific Mitigation Table for Nisga’a Nation within the Nass Wildlife Area for the Prince Rupert Gas Transmission Project BCER Pipeline Permit Section 5B (Appendix 15)

Wildlife Feature	Approximate Location		Issues	Mitigations
	KP Start	KP End		
W_262	726+359	726+608	Potential Bat Hibernaculum or Roost	<ul style="list-style-type: none"> Potential bat hibernaculum or roost requires follow-up for use by bats prior to construction/clearing activities.
W_260	726+957	727+208		
W_258	727+230	727+556		
W_259	727+213	727+524		

*This table is an excerpt from the resource-specific mitigation table relevant to the requirements inspected against, see Appendix 14 for additional information.

Condition 20 of EAC #14-06 Schedule B (Appendix 2)

The Holder must develop and implement a Plan to include all relevant wildlife mitigation, as set out in draft EMP submitted to EAO September 30, 2014 and Section 38.16 of the Application in one document.

The Plan must . . . :

- Provide specific information on how and when the mitigation will be implemented throughout the life of the Project;
- Provide information on the specific mitigation that will be implemented for habitat features that are encountered within the Certified Pipeline Corridor;

Wildlife Mitigation and Management Plan (Appendix 16)

Section 6.2 Wildlife Habitat Features Surveys - Seasonally-Dependent Surveys to be Completed

Ongoing, seasonally-dependent wildlife habitat feature surveys will be completed where the Project has the potential to interact with that feature (i.e., where Project activities are scheduled to overlap with suitable habitat, timing restrictions, and setbacks of those features, or require in-stream works). The ongoing seasonally dependent wildlife habitat feature surveys will include:

- bat hibernacula and maternity roosts

Any discoveries of wildlife habitat features will be added to the Table 7-1 of the CEMP and to the Environmental Alignment Sheets. The specific mitigation measures to be implemented will depend on the species or habitat

feature, but generally will include implementing appropriate setbacks and avoiding work for specified periods of time.

Findings:

As noted in Requirement 6 above, on October 2, 2024 the Officer observed that the Project ROW in the vicinity of KP 726+500 had been cleared. In response to information requests associated with the inspection, the Certificate Holder identified that clearing between KP 726 and 727 commenced on September 17 and was completed on September 30, 2024 (Appendix 13) and that clearing between KP 726+363 to 727+259 was ongoing or planned to start before October 2, 2024 (Appendix 17).

When the Officer requested the results of the required pre-clearing follow-up for the four potential bat hibernacula or roosts between KP 726 to 728, the Certificate Holder identified that emergence surveys for three of the four sites (W_259, W_260 and W_262) were conducted between October 3 and 20, 2024 (Appendix 13), which was after clearing had already been completed. No survey data was provided for the fourth site (W_258), beyond confirmation that an emergence survey had not been conducted at that location as it had potential as a roost only, not as a hibernaculum.

On November 21, 2024, the Certificate Holder identified to the Officer that bat surveys had, in fact, been conducted for W_259, W_260 and W_262 on September 22, 2024, additionally noting that:

While these bat surveys did identify usage, the focus was to evaluate if the potential feature had the characteristics necessary to support hibernation. The bat surveys were completed prior to clearing for W_259 and W-260 (September 27, 2024), but not for W_262 (September 17-20, 2024).

On January 22, 2025, the Certificate Holder provided the Officer with copies of the *Bat Hibernaculum Assessment Forms* for the surveys conducted at sites W_259, W_260, W_262 on September 22, 2024, which were requested as part of the inspection. The survey forms identify that, at the time of the survey, the ROW was already cleared adjacent to site of features W_260 and W_262 (Appendix 14).

Based on the information provided by the Certificate Holder, a bat usage survey was not conducted at feature W_262 in advance of clearing. Emergence surveys, conducted after clearing was complete, identified the presence of big brown or silver-haired bats emerging and in the vicinity of this feature (Appendix 13). Conflicting information has been provided regarding the completion of a usage survey in advance of clearing at feature W_260.

These findings provide evidence of non-compliance with Condition 36 with respect to following up on the use of potential bat hibernacula or roosts in advance of clearing.

Compliance Finding	Out
Enforcement Action	Warning Letter

Requirement 8: Condition 36 of EAC# E14-06 Schedule B (Appendix 2)

The Holder must develop and implement an Environmental Management Plan (EMP) in accordance with Section 36 of the Application and the draft EMP submitted to EAO on September 30, 2014.

Construction Environmental Management Plan (Appendix 10)

Appendix F-4 Chemical and Waste Management Plan (Appendix 18)

Section 3.3.1 Mitigative Measures – Prevention of Release into the Environment

6. Fuel/service vehicles will carry the following spill stand-by equipment:

- Fire extinguishers
- Shovels
- An impermeable barrier for placing under vehicles to be serviced
- Hydrocarbon spill kits complete with a minimum of 10 kg of sorbent material for clean-up of small spills.

Findings:

During the field inspection on October 2, 2024, the Officer inspected a Project service vehicle at the Road 24 laydown for the spill prevention equipment noted in Section 3.3.1 of the Chemical and Waste Management Plan (Photo 6). All of the required stand-by equipment was observed to be present.



Photo 6. Project service vehicle inspected for spill prevention equipment.

These observations provide evidence of compliance with Condition 36 with respect to spill prevention equipment.

Compliance Finding	In
Enforcement Action	Not Applicable

Actions Required by Certificate Holder and Additional Comments
None at this time.
Enforcement Summary
PRINCE RUPERT GAS TRANSMISSION LTD. IS NOT COMPLIANT WITH CONDITION 36 OF SCHEDULE B TO EAC# E14-06. PRINCE RUPERT GAS TRANSMISSION LTD. HAS BEEN ISSUED A NOTICE OF NON-COMPLIANCE, SEE REQUIREMENT 5 FOR FURTHER INFORMATION.

SEE ALSO APPENDIX 19 FOR A LETTER OF WARNING FOR ADDITIONAL NON-COMPLIANCES WITH CONDITION 36 OF SCHEDULE B TO EAC# E14-06. SEE REQUIREMENTS 6 AND 7 FOR FURTHER INFORMATION.

THE EAO CEB MAY INSPECT TO DETERMINE IF THE PRINCE RUPERT GAS TRANSMISSION 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 (2018)*.

Regulatory Considerations

As noted in Requirement 2 above, Sga Sgin’ist Lodge was operational at the time of the field inspection on October 2, 2024. Observations regarding available medical services and facilities at Sga Sgin’ist Lodge were referred to WorkSafeBC on October 10, 2024.

Inspection Record Version Dates

Date Preliminary

2024-11-14

Date Finalized

2025-03-06

Appendices:

- Appendix 1: Environmental Assessment Certificate E14-06
- Appendix 2: EAC E14-06 Schedule B Table of Conditions
- Appendix 3: Pre-Construction Compliance Self-Report 2024-07-24
- Appendix 4: Condition 3 Concordance Table 2024-07-03
- Appendix 5: Human Wildlife Conflict Plan Rev6 April 2016
- Appendix 6: Timber Salvage Strategy Rev5 2015-03-30
- Appendix 7: Construction Forest Pest Management Plan
- Appendix 8: CAB and FPBC Directory Searches 2024-11-06
- Appendix 9: EAC Application Section 36
- Appendix 10: CEMP Rev6 April 2016
- Appendix 11: 2024-10-09 princerupertgas Website Access
- Appendix 12: 2024-10-09 westernlng Website Access – PRGT Subpage
- Appendix 13: Certificate Holder Info Request Response 2024-10-23
- Appendix 14: Certificate Holder Info Request Response 2025-01-22
- Appendix 15: CEMP Table7-1a Resource-Specific Mitigation Table Rev2
- Appendix 16: Wildlife Mitigation and Management Plan Rev1 Sept2015
- Appendix 17: Certificate Holder Info Request Response 2024-10-01
- Appendix 18: CEMP Appendix F-4 Chemical and Waste Plan Rev6 April 2016
- Appendix 19: 2025-03-06 Warning Letter 20240051_WN001

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