

<b>Project Name</b>	Coastal GasLink Pipeline Project	<b>Inspection Status</b>	Final
<b>EA Certificate #</b>	E14-03	<b>Inspection No.</b>	20230030_IR001
<b>Project Status</b>	Certified	<b>Inspection Start</b>	2023-04-24
<b>Sector</b>	Energy	<b>UTM</b>	10U 540701.61 m E 6079245.08 m N
<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 (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. This inspection covered work being carried out in Sections 3 and 4. The UTM referenced above is approximately in the center of the sections of where the inspection took place.		
<b>Inspection Summary</b>	<p>On April 24, 2023, Environmental Assessment Office (EAO) Compliance and Enforcement Officers Smith and Frechette inspected the Project against the requirements of the Environmental Assessment Certificate (EAC) E14-03 (Appendix 1 and 2). On May 1, 2023, a follow-up inspection was conducted by Officer Smith.</p> <p>The Project was in Construction at the time of inspection.</p> <p>The Officers inspected between approximately KP143 to KP148, KP154+900 and KP186+400. The inspection included a debrief of observations with Project staff in the field on April 24, 2023.</p> <p>The following requirements were inspected against:</p> <ol style="list-style-type: none"> <li>1. Compliance Agreement Under Section 55 of the <i>Environmental Assessment Act</i>, Work Execution Plan for Identified Area KP143+200 to 146+200.</li> <li>2. Compliance Agreement Under Section 55 of the <i>Environmental Assessment Act</i> Work Execution Plan for Identified Area KP143+200 to 146+200.</li> <li>3. Enforcement Order under Section 53 of the <i>Environmental Assessment Act</i>.</li> </ol> <p>On May 6, 2023, Officer Smith provided the preliminary inspection record to the Certificate Holder.</p> <p>On May 12, 2023, the Certificate Holder provided comments pertaining to the preliminary inspection record and confirmed they have no comments and did not identify errors of fact or omission.</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 Compliance and Enforcement Branch (CEB).</p>		
<b>In Attendance</b>	Compliance and Enforcement Officer, Environmental Assessment Office Environmental Construction Coordinator, Coastal GasLink		
<b>Certificate Holder</b>	Coastal GasLink Pipeline Ltd.		

<b>Mailing Address</b>	450 1st Street S.W. Calgary, AB T2P 5H1
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## INSPECTION DETAILS

### **Requirement 1: Compliance Agreement Under Section 55 of the Environmental Assessment Act (Appendix 2)**

#### **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 KP143+200 to KP146+200 (Appendix 3)**

#### **Findings:**

While on inspection on April 24, 2023, EAO CEB observed evidence of the Certificate Holder failing to implement measures described within Work Execution Plan (WEP) KP143+200 to KP146+200 including:

- Water bars;
- Sediment fences, including appropriately installed and maintained sediment fences;
- Check dams; and,
- Sumps.

Project related sediment laden water was observed pooling on bridge decks and/or bypassing measures and entering the watercourses below. See the below photos for examples.



Photo 1. S2 watercourse crossing at KP 143+450. Pooling water on bridge deck.



Photo 2. High chain approach to the bridge crossing at KP 143+450. Material from the travel lane flowing towards and onto the bridge deck.





Photo 3. S4 watercourse crossing at KP 143+750. Pooling water on bridge deck.



Photo 4. S4 watercourse crossing at KP 143+750 beneath bridge.





Photo 5. Sediment laden flow through measures and into watercourse at KP143+750.



Photo 6. Sediment laden flows in the channel downstream of the bridge crossing at KP143+750.

The observations made and evidence collected during the inspection provide evidence of non-compliance with the requirements in the Compliance Agreement to implement the Work Execution Plan, specifically WEP KP143+200 to KP146+200.

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

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

**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 KP143+200 to KP146+200 (Appendix 3)

**Schedule B – Identified Areas**

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

- KP 143+200 to 146+200

**Pumping Procedures:**

- Proposed pumping locations, both specific points and areas, have been indicated on the SSESCEPs. These points and/or areas will be approved by CGL as per the EMP prior to use (Section 8.5.3, 'Water Management'). All active pumping will be monitored twice daily by the ESC/Utility crew (outlined below) assigned to the area to confirm that turbid water is not impacting an ESR; areas that have been deemed frozen are not considered active pumping sites. Pump monitoring to be tracked via a Survey123 app by the ESC/Utility crew foreman.
- Sediment traps requiring pumps during non-frozen conditions are indicated on the SSESCEPs.

**Findings:**

During the helicopter flight on April 24, 2023, EAO CEB observed a filter bag placed adjacent to the right of way (ROW) and at the top of a slope above a fish-bearing watercourse (watershed code: 236-313100-60100-43600). Evidence of sediment laden discharge from the filter bag into the fish-bearing watercourse was observed. Upon further inspection on the ground and cross referencing the WEP, it was confirmed that the filter bag was not installed in an approved pumping area.

At the time of the inspection, the bag was disconnected from the hoses and not being used. No water was actively being pumped to the filter bag. However, a second, newer filter bag was also installed within 10 metres of the first filter bag. This second filter bag was connected to hoses and the lines of the hoses were primed. These hoses were traced back to a sump on the ROW containing sediment laden water. The pump was not actively running while EAO CEB was onsite.



Date & Time: Mon, Apr 24, 2023 at 16:24:51 PDT  
Position: 10 N 554864 6101610 (-3.8m)  
Altitude: 1028m ( $\pm 6.0m$ )  
Datum: WGS-84  
Azimuth: -003° -0058mils ( $\pm 12^\circ$ )  
Elevation Grade: +115%  
Horizon Grade: +097%  
Zoom: 0.5X  
144+650



Photo 7. Filter bag at roughly KP 144+650 placed immediately above Environmentally Sensitive Receptor.

Date & Time: Mon, Apr 24, 2023 at 16:18:56 PDT  
Position: 10 N 554864 6101614 (-4.2m)  
Altitude: 1029m ( $\pm 3.4m$ )  
Datum: WGS-84  
Azimuth: -037° -0658mils ( $\pm 12^\circ$ )  
Elevation Grade: +056%  
Horizon Grade: +097%  
Zoom: 0.5X  
144+650



Photo 8. Deposited material from filter bag discharge at approximately KP 144+650.





Photo 9. KP 144+650 evidence of filter bag discharge reaching Environmentally Sensitive Receptor (watercourse).



Photo 10. Second filter bag with hose primed for use.





Photo 11. Sump where water is pumped into the second filter bag.

Approximately adjacent to KP143+800 wetland number WL-143.89 is located. During the inspection, a filter bag connected to discharge hose from a pumping location was observed within wetland KP-143.89. The filter bag at approximately KP143+800 was not installed within an approved pumping location or pumping area as required in the WEP. See the below photos for more details.



Photo 12. Filter bag set up within wetland WL-143.89. Red arrows indicate wetland identification sign and filter bag.





Photo 13. Discharge hose from pumping location connected to filter bag within wetland WL-143.89.

The observations made and evidence collected during the inspection provide evidence of non-compliance with the requirements in the Compliance Agreement to implement the Work Execution Plan, specifically WEP KP143+200 to KP146+200.

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

**Requirement 3: Enforcement Order Under Section 53(1) of the *Environmental Assessment Act* (Appendix 4)**

Order Number: 20230030\_OR001

Pursuant to Section 53(1)(a) of the Act, I order that the Certificate Holder must:

- 1) Effective 6:00pm PDT April 28, 2023, cease all Progressive Construction activities on the Project between KP 143+200 to 146+200.

\*See Appendix 4 for full wording of Order number 20230030\_OR001

**Findings:**

Following the April 24, 2023 inspection of the Project, an Enforcement Order (the Order) under Section 53(1) of the *Environmental Assessment Act* was issued to the Certificate Holder on April 28, 2023. Clause 1 of the Order requires the Certificate Holder to cease all Progressive Construction activities on the Project between KP 143+200 to 146+200.

On May 1, 2023, EAO CEB conducted a field inspection to confirm that progressive construction was stopped. The observations made in the field during the May 1, 2023 inspection confirmed that the Certificate Holder had complied with Clause 1 of the Order; no progressive construction activities were taking place between KP 143+200 to 146+200.



**Compliance Determination:** In

## Actions Required by Certificate Holder & Additional Comments

None at this time.

## Enforcement Summary

**COASTAL GASLINK PIPELINE LTD. IS NOT COMPLIANT WITH THE COMPLIANCE AGREEMENT UNDER SECTION 55 OF THE *ENVIRONMENTAL ASSESSMENT ACT*. ON APRIL 28, 2023, AN ORDER WAS ISSUED TO THE CERTIFICATE HOLDER UNDER SECTION 53 OF THE *ENVIRONMENTAL ASSESSMENT ACT* (APPENDIX 4).**

**EAO CEB 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> <b>2023-05-06</b>
	<b>Date Finalized</b> <b>2023-05-16</b>

## Appendices

Appendix 1: Environmental Assessment Certificate # E14-03  
 Appendix 2: Compliance Agreement Under Section 55 of the Environmental Assessment Act  
 Appendix 3: WEP\_KP143+200-146+200\_Rev09-SIGNED  
 Appendix 4: 20230030\_OR001\_Coastal\_GasLink\_April 28 2023

## Environmental Assessment Office - Compliance & Enforcement Branch

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