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November 17, 2014

VIA RESS ELECTRONIC FILING

Attention: Kirsten Walli, Board Secretary

Ontario Energy Board

2300 Yonge Street

27th Floor

Toronto, ON M4P 1E4

Dear Madam Secretary:

**RE: Union Gas Ltd. – Dawn Parkway 2016 Expansion Project – OEB File No. EB-2014-0261
GAPLO Interrogatories to Union Gas Limited**

We are the lawyers for the Gas Pipeline Landowners of Ontario ("GAPLO") in the above noted proceeding. Please find enclosed GAPLO's interrogatories to Union Gas Limited filed pursuant to the Board's Procedural Order 1.

Yours truly,

SCOTT PETRIE LLP
LAW FIRM



John D. Goudy

Encl.

ONTARIO ENERGY BOARD

IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, and in particular, S.36 thereof;

AND IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, and in particular, S.90(1) thereof;

AND IN THE MATTER OF the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, Schedule B, and in particular, S.91 thereof;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders for approval of recovery of the cost consequences of all facilities associated with the development of the proposed Lobo C Compressor/Hamilton-Milton Pipeline project;

AND IN THE MATTER OF an Application by Union Gas Limited for an Order or Orders granting leave to construct natural gas pipelines and ancillary facilities in the City of Hamilton, City of Burlington, and the Town of Milton, and leave to construct a compressor and ancillary facilities in the Municipality of Middlesex Centre.

GAPLO INTERROGATORIES TO UNION GAS LIMITED

November 28, 2014

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|-----|--------------------|---|
| 1.1 | References: | Application, Exhibit "A", Tab 8, page 1 of 13, Facilities Planning |
| | Preamble: | Union Gas Limited states that the "evidence assumes the Board-approved Brantford to Kirkwall Pipeline and Parkway D Compressor located in the Parkway West Compressor Station, will be completed for a November 1, 2015 in service date." |
| | Request: | <ul style="list-style-type: none"> a) What is the status of the acquisition of required land rights for the Brantford to Kirkwall Pipeline? b) What is the status of construction of the Brantford to Kirkwall pipeline? c) Is the Brantford to Kirkwall pipeline project on schedule with respect to construction? Please explain. d) What effect will a delay or postponement of the November 1, 2015 in service date have on the Dawn Parkway 2016 System Expansion project? |

- 1.2 References:** Application, Exhibit "A", Tab 11, page 6 of 15, Engineering and Construction
- Stantec EA Report, Section 4.1.2, page 4.3
- Preamble:** Union Gas Limited states: "Minimum depth of cover required will be 1.0 metre from top of pipe to final grade. Where necessary, additional cover will be used to accommodate planned or existing underground facilities, and road, railway and watercourse crossings. In agricultural areas the minimum depth of cover will be 1.2 metres, except where bedrock is encountered at a depth less than 1.2 metres, in which case the pipe will be installed with the same cover as the bedrock, but not less than 1.0 metres below grade."
- The EA Report states that operational activities for the pipeline will include "completing depth of cover surveys, so that the amount of soil cover over the pipeline is maintained."
- Request:**
- a) Please provide a copy of Union Gas Limited's depth of cover monitoring program documents.
 - b) What is the depth of cover monitoring program proposed for the proposed pipeline?
 - c) What is the minimum depth of cover that will be maintained by Union Gas Limited over the proposed pipeline following construction (i.e. during operation)?
 - d) Please provide details of all locations in the existing easements in the section where Union has identified insufficient depth of cover of less than 24 inches and all identified locations in agricultural lands with less than the minimum depth of cover proposed and/or required at the time leave to construct was granted.
 - e) With respect to those locations where depth of cover is insufficient, what steps, if any, has Union Gas Limited taken to establish sufficient depth of cover? Provide details of any such operations including a copy of any report prepared.
 - f) Are there locations on the Dawn to Parkway system where Union Gas Limited, due to the presence of insufficient cover or other factors, has indicated to landowners that they should exercise extra caution when carrying out activities, including farming operations, above the pipeline? Please provide details of any such communications made to landowners including: location affected, copies of correspondence, records of responses from landowners.
 - g) Are there any locations on the Dawn to Parkway System where Union Gas Limited has restricted land use above the pipeline due to insufficient depth of cover or the condition of the pipe itself? Provide details of the location, the nature of the deficiency (depth of cover, etc.), and the nature of the restriction imposed on land use.

- h) How does Union Gas Limited monitor nearby houses, buildings and facilities for possible damage from blasting and/or excavation of bedrock during construction? Please explain.

- 1.3 References:** Application, Exhibit "A", Tab 11, page 4 of 15, Engineering and Construction
- Preamble:** Pipe to be installed in Class 3 locations will have a thickness of 15.6 mm; pipe to be installed in Class 1 and 2 locations will have a thickness of 11.7 mm (25% thinner than in Class 3 locations).
- Request:**
- a) Will the use of 11.7 mm thick pipe through Class 1 and Class 2 lands have an effect on the types of remedies available to address insufficient depth of cover as compared with the remedies available for 15.6 mm thick pipe?
 - b) Will the minimum depth of cover permitted by Union Gas Limited following construction (i.e. during operation) differ as between sections of the pipe with 11.7 mm thickness and 15.6 mm thickness? Please explain.
 - c) Which thickness of pipe provides better protection for farmers and landowners conduct agricultural and other activities over the proposed pipeline – 11.7 mm or 15.6 mm? Please explain.
 - d) What would be the incremental increases in the cost of the project (broken down into materials and other costs) if 15.6 mm pipe was used for the entire project?
- 1.4 References:** Application, Exhibit "A", Tab 11, page 7 of 15, Engineering and Construction
- Preamble:** Union Gas Limited states: "Union also anticipates no problem in obtaining a contractor to complete the proposed construction."
- Request:**
- a) Has the construction contract been tendered?
 - b) If so, please provide a copy of the tender.
 - c) If not, please provide a copy of the proposed tender.
 - d) Has a construction contractor been selected and, if so, who is the contractor?
 - e) Please provide a copy of the construction contract or, if applicable, the proposed construction contract.
- 1.5 References:** Application, Exhibit "A", Tab 11, page 9 of 15, Engineering and Construction
- Preamble:** Union Gas Limited states: "Union will provide inspection staff to ensure that contractual obligations between Union and the Pipeline Contractor, Provincial Ministries, Municipal Government and Landowners are complied with."
- Request:** Will Union Gas Limited agree to the appointment of an Independent Construction Monitor by landowners, Union Gas Limited and the

OEB to be on site continuously to monitor construction with respect to all issues of concern to landowners, to be available to landowners and to Union Gas Limited at all times, and to file interim and final reports with the OEB? If not, please explain why not.

- 1.6 References:** *OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011, Section 5.1.2, page 64, Restoration Plans*
- Preamble:** The *OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011* include the following guidelines with respect to the rehabilitation of the easement post-construction:
- “The landowner must be consulted and any reasonable request regarding rehabilitation of the easement complied with. Planting of soil-building cover crops should be considered. ... It is recommended that a professional agronomist/agrologist be retained to review the proposed restoration technique and its application with the contractor and the landowner, in order to ensure that optimal results are achieved.”
- Request:**
- a) Has Union Gas retained a professional agronomist and/or agrologist for this project?
 - b) If so, please provide his or her most recent resume or CV.
 - c) If not, when will a professional agronomist and/or agrologist be retained by Union Gas, and in what capacity?
- 1.7 References:** Application, Exhibit “A”, Tab 13, page 1 of 4, Land Matters
- Preamble:** Union Gas Limited states: “Union has initiated meetings with the landowners from whom either permanent or temporary land rights are required and will continue to meet with them to acquire options to acquire all the necessary lands.”
- Request:**
- a) Please provide the form or forms of options acquired or proposed by Union Gas Limited.
- 1.8 References:** Application, Exhibit “A”, Tab 13, page 1 of 4, Land Matters
- Preamble:** Union Gas Limited will require approximately 39 hectares (95 acres) of permanent easement of which it has already acquired 27.6 hectares (68.2 acres). Union Gas Limited will also require approximately 31 hectares (76 acres) of temporary working space.
- Request:**
- a) Please provide any update on the status of land rights acquisition by Union Gas Limited.
 - b) Please provide a copy of any real estate appraisal obtained by Union Gas Limited with respect to lands along the proposed route.

- 1.9 References:** Application, Exhibit "A", Tab 13, page 3 of 4, Land Matters
- Preamble:** Union Gas Limited states: "Preliminary discussions have not identified any strong objection to the Proposed Pipeline."
- Request:**
- a) Please provide details of any objections to the proposed pipelines that have been identified.
 - b) How have these objections been addressed by Union Gas?
- 1.10 References:** Stantec EA Report, Section 4.4.7, page 4.71, Table 4.11, Land Use
- Preamble:** The EA Report states: "Consultation has been initiated, and will continue, with agricultural landowners along the proposed pipeline route in order to identify methods of minimizing disturbance to their operations."
- Request:** What methods of minimizing disturbance to agricultural operations have been identified by Union Gas Limited?
- 1.11 References:** Application, Exhibit "A", Tab 13, page 4 of 4, Land Matters
- Preamble:** Union Gas Limited states: "When the cleanup is completed, the Landowner will be asked by Union to sign a clean-up acknowledgement form if satisfied with the clean-up. This form, when signed, releases the Pipeline Contractor allowing payment for the clean-up on the property. This form in no way releases Union from its obligation for tile repairs, compensation for damages and/or further clean-up as required due to erosion or subsidence directly related to pipeline construction."
- Request:** Please provide a copy of Union Gas Limited's clean-up acknowledgement form.
- 1.12 References:** Application, Exhibit "A", Tab 11, Schedule 2, General Techniques and Methods of Construction
- Preamble:** On past projects, Union Gas Limited has made formal construction methodology agreements with landowners in the form of a Letter of Understanding.
- Request:**
- a) Please provide a copy of Union Gas Limited's Letter of Understanding or similar landowner construction agreement proposed for this project.
 - b) If no agreement is proposed, please explain why not.
- 1.13 References:** Application, Exhibit "A", Tab 11, Schedule 2, General Techniques and Methods of Construction
- Preamble:** On farmland, Union Gas Limited picks stones down to 100 mm in diameter.
- Request:**
- a) On what basis did Union Gas Limited select 100 mm as the minimum size for stones to be picked?

- b) Please confirm that Union Gas Limited has previously agreed to pick stones of a size 50 mm or larger on other pipeline projects.
- c) Why has Union Gas Limited reverted to picking stones only where they are 100 mm or larger in diameter?

1.14 References: Application, Exhibit "A", Tab 12, Schedule 2, Summary of Comments (OPCC)

Preamble: Summary of Comments to be filed when received.

Request: Please provide copies of OPCC comments received to date and going forward.

1.15 References: Application, Exhibit "A", Tab 12, Schedule 3, Total Estimated Environmental Costs

Preamble: Environmental costs include water well monitoring, wet soil shutdown, soil protection and restoration, environmental inspection, etc.

Request: Please explain how these estimates were calculated and provide background calculations and data.

1.16 References: Application, Exhibit "A", Tab 13, Schedule 3, Pipeline Easement

Preamble: Clause 1 in the Pipeline Easement states that, "Transferor and Transferee hereby agree that nothing herein shall oblige Transferee to remove the Pipeline from the Lands as part of Transferee's obligation to restore the Lands."

Request:

- a) Other than in the above referenced clause of the Pipeline Easement, where is pipeline abandonment addressed in the Application or the EA Report? If it is not addressed, please explain why it is not addressed.
- b) What are the potential adverse effects of the proposed pipeline in the event of future abandonment or discontinuance of operation?
- c) How does Union Gas Limited propose to abandon its proposed pipeline and the adjacent pipelines in the future?
- d) Has Union Gas Limited developed a conceptual plan to address adverse effects of future abandonment or discontinuance of operation? Please provide particulars of any such plan. If no plan has been developed, please explain why not.
- e) What provision has Union Gas Limited made for the funding of future abandonment activities?
- f) Will Union Gas Limited agree to replace the above referenced portion of Clause 1 with: "As part of the Transferee's obligation to restore the Lands upon surrender of its easement, the Transferee agrees at the option of the Transferor to remove the Pipeline from the Lands. The

Transferee and the Transferor shall surrender the easement and the Transferee shall remove the Pipeline at the Transferor's option where the Pipeline has been abandoned. The Pipeline shall be deemed to be abandoned where: a) corrosion protection is no longer applied to the Pipeline, or, b) the Pipeline becomes unfit for service in accordance with Ontario standards. The Transferee shall, within 60 days of either of these events occurring, provide the Transferor with notice of the event. Upon removal of the Pipeline and restoration of the Lands as required by this agreement, the Transferor shall release the Transferee from further obligations in respect of restoration." If not, why not?

- g) Will Union Gas further make the language set out in part (e) applicable to all Union Gas Limited pipelines on the Transferor's Lands? If not, why not?
- h) If Union Gas Limited will not agree to the replacement language set out in parts (e) and (f) above, will Union Gas Limited agree to remove the last sentence of Clause 1 in the above referenced Pipeline Easement: "Transferor and Transferee hereby agree that nothing herein shall oblige Transferee to remove the Pipeline from the Lands as part of Transferee's obligation to restore the Lands."? If not, why not?

1.17 References: Application, Exhibit "A", Tab 13, Schedule 3, Pipeline Easement

Preamble: Clause 3 of the Pipeline Easement provides that Union Gas Limited agrees "to make reasonable efforts to accommodate the planning and installation of future tile drainage systems following installation of the Pipeline so as not to obstruct or interfere with such tile installation."

Request: Will Union Gas Limited agreed to add the following sentence to the end of Clause 3 of the Pipeline Easement: "The Transferee agrees to make reasonable efforts at its own expense to accommodate changes in land use on lands adjacent to the easement for the purpose of ensuring the Pipeline is in compliance with all applicable regulatory requirements in connection with any such change in use."? If not, why not?

1.18 References: Application, Exhibit "A", Tab 13, Schedule 3, Pipeline Easement

Preamble: Clause 9 of the Pipeline Easement addresses the possibility of the installation by Union Gas Limited of surface facilities.

Request:

- a) Does Union Gas Limited expect that any surface facilities will be required on lands for which it will be obtaining easements for the proposed project? If so, please provide details of these surface facilities.
- b) Please provide a copy of Union Gas Limited's proposed form of agreement for surface facilities.

- 1.19 References:** Application, Exhibit “A”, Tab 13, page 2 of 4, Land Matters
- Preamble:** Union Gas Limited states: “The temporary easements are in the form previously provided to the Board and used by Union in the past on similar pipeline projects. These agreements are usually for a period of two years, beginning in the year of construction. This allows Union the opportunity to return in the year following construction to perform further clean-up work as required.”
- Request:** Please provide a copy of Union Gas Limited’s temporary easement form(s).
- 1.20 References:** Application, Exhibit “A”, Tab 13, Schedule 4, Landowner Complaint Resolution System
- Preamble:** Landowner Complaint Resolution System includes use of Form 3150.
- Request:** Please provide a copy of Form 3150.
- 1.21 References:** Stantec EA Report, Page 7.1
- Preamble:** Stantec’s EA Report was prepared by Mark Knight and reviewed by David Wesenger.
- Request:** Please provide copies of the most recent resumes or CVs for Mr. Knight and Mr. Wesenger.
- 1.22 References:** Stantec EA Report, Section 2.4, Page 2.4
- Preamble:** The EA Report states:
- “Union Gas has determined that over 40% (12m of the 28m total) of the required permanent easement for the project could be overlapped with the existing, previously disturbed pipeline easement.”
- “It would enable Union Gas and Stantec to make use of the knowledge gained from the 2006 construction of a 48 inch pipeline from Hamilton to Milton.”
- Request:**
- a) Please provide a copy of the EA Report for the 2006 Hamilton to Milton pipeline.
 - b) Please provide the interim and final monitoring reports for the 2006 Hamilton to Milton pipeline.
- 1.23 References:** Stantec EA Report, Section 4.3.3, page 4.27
- Preamble:** The EA Report states:
- “During the construction of a parallel pipeline in 2006, an Environmental Protection Plan was developed that included mitigation measures in wetlands pre, during, and post-construction. As the plan was successful in facilitating construction in 2006, it is

recommended that the Plan is updated by Union Gas and reviewed by interested parties prior to the initiation of construction.”

- Request:**
- a) Please provide a copy of the Environmental Protection Plan for the 2006 Hamilton to Milton pipeline.
 - b) Please provide the Environmental Protection Plan for the proposed pipeline.
 - c) Have any updates been made to the Environmental Protection Plan from the 2006 Hamilton to Milton pipeline? If so, please identify the updates.

1.24 References: Stantec EA Report, Section 4.2.3, page 4.9

OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011, Section 6.2.2, page 69, Monitoring Reports

Preamble: The EA Report states: “Union Gas should hire an independent hydrogeologist to assess the need for, and to develop if necessary, a well monitoring program.”

The *OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011* include the following guideline with respect to water testing: “Before, during and after construction, a water quantity and quality survey of wells near the pipeline should be conducted in conjunction with the MOE Regional Office.”

- Request:**
- a) Will Union Gas Limited agree to implement a pre-, during, and post-construction monitoring program for all drilled and dug wells within 100 metres of the proposed pipeline easement and for any other wells recommended for monitoring by Union Gas Limited’s hydrogeology consultant? If not, why not?
 - b) Will Union Gas Limited agree to make the monitoring report available to the applicable landowner(s)? If not, why not?
 - c) Does Union Gas Limited agree that it will restore or replace any water well that is damaged (with respect to quantity and/or quality) from its pipeline construction and operation? If not, why not?

1.25 References: Stantec EA Report, Section 4.2.4, page 4.9

Preamble: The EA Report states: “The preferred route will not cross lands currently used for resource extraction, or land on which future resource extraction is likely.”

- Request:**
- a) On what basis did Stantec determine that the preferred route does not cross lands on which future resource extraction is likely? Please explain.
 - b) Is future resource extraction possible on any of the lands crossed by the preferred route? Please identify any such lands.

1.26 References: Stantec EA Report, Section 4.2.5, pages 4.11 and 4.13, Soil and Soil Capability

Preamble: The EA Report states:

“Where equipment is moving from one agricultural field to another there is the potential for the spread of soybean cyst nematode (*Heterodera glycines*) to previously uncontaminated fields. Once a field has been infested there is significant potential for soybean crop loss and there is no effective method of eradication.”

“If soybean cyst nematode affected areas are discovered, a plan should be undertaken which will outline the mitigation measures such as the use of machine washing stations.”

Request:

- a) Please provide Union Gas Limited’s plan for dealing with soybean cyst nematode.
- b) What is Union Gas Limited’s plan for the control and containment of other weed and/or disease infestations encountered during construction and operation of the proposed pipeline?
- c) Was any soybean cyst nematode identified in the previous constructions along this corridor? Please provide details and copies of any reports or studies prepared.
- d) What is Union Gas Limited’s experience with the transfer of soybean cyst nematode and other weed and/or disease infestations from property to property during construction or as a result of construction? Please provide details.
- e) Please provide details of any landowner complaints received with respect to soybean cyst nematode, weeds or diseases along this corridor. How were these resolved?

1.27 References: Stantec EA Report, Section 4.2.5, page 4.11, Soil and Soil Capability

Preamble: The EA Report states: “Construction activities should be temporarily halted on lands where excessively wet soil conditions are encountered, as per Union Gas’ standard wet soils shutdown practice. Union Gas’ on-site inspection team should determine when construction activities may be resumed.”

Request: Please provide a copy of Union Gas Limited’s standard wet soils shutdown practice.

1.28 References: Stantec EA Report, Section 5.3, pages 5.2-5.3, Analysis of Cumulative Effects

OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011, Section 4.3.14, pages 44 et ff., Cumulative Effects

OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011, Section 6.2.2, page 68, Monitoring Reports

Preamble:

The Stantec EA Report does not appear to include consideration of adjacent pipelines and pipeline easements in its analysis of cumulative effects.

The *OEB Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 6th Edition 2011* include the following guidelines with respect to the assessment of cumulative effects:

Page 44 et ff.: “Cumulative impacts may result from pipeline projects which loop existing systems and should be addressed. This may include an examination of areas of known soil erosion, soil compaction or soil productivity problems. It may mean the examination of impacts associated with continued loss of hedgerows and woodlots in the same area. As well, it could mean the increased loss of enjoyment of property because of disruptions caused by the construction of successive pipelines on a landowner’s property. There may also be heightened sensitivities as a result of improper or ineffective practices and mitigation measures in the past.”

“Cumulative effects, when identified as part of the assessment process, should be integrated in the appropriate section of the ER (e.g. soil impacts.”

“The following is a list that encompasses some of the cumulative effects of pipeline construction:

- (a) Incremental increase of easement width when adding new parallel pipelines to reinforce the systems;
- (b) Additive effects of vegetation removal including riparian vegetation, forest cover, agricultural crops;
- (c) Repetitive disturbance of soils including soil compaction, drainage systems damages, loss of soil fertility, crop yield reduction;
- (d) Streams and groundwater degradation and effects on water wells;
- (e) Residual effects caused by the removal of forest edge and interior, such as reduced species diversity and other habitat alterations.”

Page 68: “The Final Monitoring Report should address any potential cumulative effects which may arise for pipelines, these may include for example, reduced soil productivity over easements which overlap, land-use restrictions due to increased easement widths or additional above ground facilities and/or the repeated construction through sensitive areas.”

Request:

- a) For each of the existing adjacent pipelines, please provide the pipe material and grade, wall thickness, operating pressure, separation distances from each other and from the new pipeline.
- b) Please provide a detailed chronology of pipeline development on the properties affected including: dates of construction,

widths of individual easements obtained or acquired, total width of corridor, projected economic life of each pipeline.

- c) Please provide copies of interim and final monitoring reports for the pipelines in the corridor.
- d) Please provide details of damage caused to soils within the corridor and of crop loss suffered within the corridor in connection with previous Union Gas Pipeline construction projects and operations.
- e) What is Union Gas Limited doing to investigate and remediate residual damage from past projects within the corridor?
- f) Has Union Gas studied crop yield effects from previous pipeline constructions in the Dawn to Parkway corridor, including on the lands to be affected by the new construction? Please provide any reports, data, results, conclusions, analyses, etc. in connection with such study.
- g) What are the cumulative effects that would result from the abandonment or discontinuance of operation of one or more of the pipelines within the corridor?

1.29 References: Stantec EA Report, Section 4.1.2, page 4.4, Operation

Preamble: Operational activities for the pipeline will include “performing periodic inspection by running electronic tools through the interior of the pipeline to assess for the presence of corrosion or dents and the need for repairs.”

- Request:**
- a) Please provide a copy of Integrity Management Plan
 - b) Please provide a copy of Corrosion Management Plan
 - c) What is Union Gas Limited’s plan for electronic tool inspection of the proposed pipeline? Please provide details of proposed inspections.
 - d) Please provide copies of any pipeline integrity reports for the pipeline adjacent to the proposed pipeline.

1.30 References: Stantec EA Report, Tab B5, Public Comment 24 Response and Public Comment 25 Response

Preamble: Jeff Wesley of Union Gas Limited advises that most of the 26” and 34” lines have already been replaced.

- Request:**
- a) Please provide records of replacement and repair for other pipelines within the same corridor.
 - b) Please provide a copy of Union Gas Limited’s policy and/or procedures for investigative, maintenance or repair digs along the corridor.
 - c) Does Union Gas Limited’s Integrity Dig Agreement as endorsed by Union Gas Limited and GAPLO apply to the lands along the Hamilton to Milton pipeline? If not, why not?