



Kimball Pipeline Replacement Project

Table 1: Environmental Report Comments and Responses

Record	Stakeholder	Type/Date Received	Comment Summary	Responder/ Type/Date Sent	Response Summary
Agency					
1	Oscar Alonso Fuels Safety Engineer, Technical Standard Safety Authority (TSSA)	Letter/ May 19, 2015	<ul style="list-style-type: none"> Suggested the use of terms defined in CSA Z662 when referring to replacements of existing pipeline to clarify the intentions of the operating company for pipeline abandonment (i.e., piping, abandoned or piping, deactivated). Provided a guidance document TSSA "Pipeline Abandonment Checklist" for the planning and implementation of the abandonment. Requested the pipeline technical specifications. 	NOVA Chemicals/ Letter /June 23, 2015	<ul style="list-style-type: none"> NOVA Chemicals had a conference call with TSSA (June 22, 2015) to review TSSA's letter. NOVA Chemicals confirmed via letter response (June 23, 2015) that the TSSA Abandonment Checklist has been incorporated into the Abandonment Procedure which is being presented to the Township of St. Clair. Also noted that the TSSA is comfortable with waiting for the technical specifications for the Proposed Pipeline until NOVA Chemicals files its leave to construct application later this month.



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May 19, 2015

Mr. Stephanie Dryden-Cripton, M.A.,
Project Manager
Stantec Consulting Ltd.,
79 Southgate Drive, Suite 1,
Guelph, ON N1G 4P5

Re: Environmental Report – Nova Chemicals (Canada) Ltd.'s Kimball Pipeline Replacement Project.

Dear Mrs. Dryden-Cripton:

This is in response to your letter dated May 7, 2015, regarding the referenced project.

I would suggest the use of define terms in the CSA Z662 when referring to replacements of existing pipeline to clarify the intentions of the operating company for pipeline abandonment. It is stated in your letter "the project will replace a dormant 4" NLG". The CSA Z662 code uses two defined terms to indicate the pipeline replacement or pipelines that would not be temporarily used but although disconnected from the active pipeline system, are maintained for eventual future use:

Piping, abandoned — piping that is removed from service and not maintained for later return to service.

Piping, deactivated — piping that is removed from service and maintained for later return to service.

In this project, it is my understanding that both pipelines, the NPS 4 and NPS 8 will be "abandoned". However, it seems that parts of the abandoned pipelines will be removed while other parts may be left underground. If left in the ground, the TSSA "Pipeline Abandonment Checklist" here attached is suggested as a guidance for the planning and implementation of the abandonment.

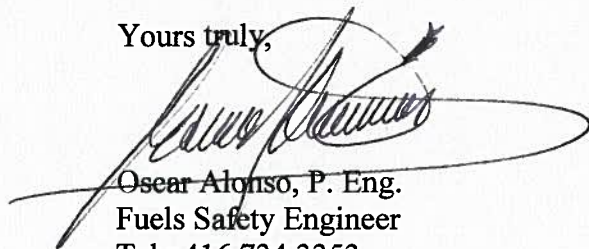
I will appreciate to receive the pipeline technical specifications when available.

If you have any further questions, please call me.

...2

Mr. Stephanie Dryden-Cripton, M.A.,
May 19, 2015

Yours truly,

A handwritten signature in black ink, appearing to read 'Oscar Alonso', is written over the words 'Yours truly,'. The signature is stylized with a large loop at the end.

Oscar Alonso, P. Eng.
Fuels Safety Engineer
Tel.: 416 734 3353
Fax. 416 231 7525
e-mail: oalonso@tssa.org

Attachment

c: Zora Crnojacki,
Project Advisor
Ontario Energy Board
2300 Yonge Street, 26 Floor,
Toronto, ON M4P 1E4

L:\FSESB\oa\Letter to Stephanie Dryden-Cripton Nova's Kimball Project



PIPELINE ABANDONMENT CHECKLIST

PLANNING

1. Has subsidence been considered for pipelines having a diameter greater than 323.9 mm (12 inches)?
2. Has the pipeline company notified the landowners and proper authorities (municipalities, MOE, MTO, MNR, etc.) of the abandonment?
3. Have abandonment procedures for crossings been agreed upon by utilities (road, railway, pipelines, etc.) and authorities responsible for rivers and streams crossed by the pipeline?
4. Has consideration been given to the effect of drainage in the area surrounding the abandoned pipeline, which may act as a conduit for ground water after the pipe is perforated by corrosion?
5. Has consideration been given to the removal of all the aboveground facilities?
6. Has consideration been given to any hazards posed to people, equipment, wildlife or livestock by any apparatus left in place above or underground?

IMPLEMENTATION

1. Has the abandoned pipeline been physically isolated from the live pipeline?
2. Has the pipeline been drained of all fluids and adequately cleaned to prevent ground water contamination from hydrocarbon residue on the pipe wall after the pipe is perforated by corrosion?
3. Have all aboveground facilities been removed and has consideration been given to removing underground facilities such as anode beds and tanks?

LIABILITY/RISK MANAGEMENT

1. Does the pipeline company have a contingency plan to remedy any contamination caused by the abandoned pipeline?
2. Has consideration been given to conducting post-abandonment surveillance programs?
3. Has consideration been given to maintaining signage after the pipeline is abandoned?
4. Has consideration been given to providing a locate service after the pipeline is abandoned?



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Via Email and Courier

June 24, 2015

Technical Standards and Safety Authority
14th Floor, Center Tower, 3300 Bloor Street
Toronto, Ontario M8X 2X4

Attention: Mr. Oscar Alonso, P.Eng

RE: Environmental Report – NOVA Chemicals (Canada) Ltd.'s Kimball Pipeline Replacement Project

Dear Mr. Alonso:

Thank you for speaking to me Monday about your letter dated May 19, 2015 to Stephanie Dryden-Cripton of Stantec Consulting Ltd. ("Stantec"), which commented on the Environmental Report sent to you on May 7, 2015. Capitalized terms used in this letter have the meanings given to them in Stantec's May 7 letter.

1. Removal and Abandonment from the RoW

The Proposed Pipeline will replace the NPS4 pipeline from an operational perspective because both are for the transportation of NGL's. The Project calls for the removal of the NPS4 pipeline from the RoW, except for the portions of that line in the road allowances for Ladysmith Road and Tecumseh Road. We have discussed this planned abandonment with representatives of St. Clair Township and have prepared an Abandonment Plan for their consideration. The Plan incorporates the Pipeline Abandonment Checklist which accompanied your letter.

2. Pipeline Technical Specifications

Pipeline technical specifications and additional design information for the Proposed Pipeline will be included in our application to the Ontario Energy Board for leave to construct the Proposed Pipeline, which we currently expect to file before the end of this month. You indicated that you will wait to receive a copy of our filed application to review the technical specifications for the Proposed Pipeline.

If you have any questions about this letter or our Project, please contact me to discuss them.

Sincerely,

NOVA Chemicals (Canada) Ltd.

Per: Mac Hollingsworth
Project Manager

A handwritten signature in black ink, appearing to read "Mac Hollingsworth", written in a cursive style.