

December 14, 2018

BY RESS & Courier

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
Suite 2700, 2300 Yonge Street
Toronto, Ontario
M4P 1E4

Dear Ms. Walli:

**Re: Union Gas Limited (“Union”)
Oxford Reinforcement Project
Board File # EB-2018-0003**

Pursuant to Condition 6. (a) i-v. of the Board’s Conditions of Approval for the above-noted project, enclosed please find the Post Construction Report .

Sincerely,

[original signed by]

Shelley Bechard
Administrative Analyst, Regulatory Projects

cc: Z. Crnojacki
N. Marconi
Regulatory Library

**2018 OXFORD REINFORCEMENT PROJECT
POST CONSTRUCTION REPORT
EB-2018-0003**

Prepared by: Union Gas Limited
Environmental Planning
November, 2018

TABLE OF CONTENTS

Oxford Reinforcement Project
Post Construction Report

	<u>Page No.</u>
1.0 Introduction	1
2.0 Background	3
3.0 Potential Impacts and Mitigation	3
3.1 Condition 1.0)	3
3.2 Condition 3.0)	4
3.3 Condition 4.0)	4
3.4 Condition 6.0)	4
a) i	4
a) ii	5
a) iii	5
3.4.1 Monitoring Programs	5
3.4.1.1 Archaeological Assessment	5
a) iv	5
a) v	6
Condition 6.0) b)	6
4.0 Summary	7

TABLE 1..... Potential Impacts and Mitigation Measures

APPENDIX A..... Location Map

APPENDIX B..... Conditions of Approval

APPENDIX C.....Executive Certification

1.0 INTRODUCTION

This Post Construction Report is provided in compliance with the Ontario Energy Board (“Board”) Order EB-2018-0003 granting Union Gas Limited (“Union”) “Leave to Construct” the Oxford Reinforcement Project consisting of approximately 5.2 kilometers of NPS 8 inch natural gas pipeline in the Counties of Oxford and Norfolk.

The new pipeline is required to meet the increasing demands for natural gas in these areas. There have not been any significant changes to the Eastern Transmission System in the past 15 years and the System will reach maximum capacity in 2019 and therefore reinforcement was required to service new loads in the area. The new NPS 8 inch pipeline will extend from the corner of Potters Road and Baseline Road in the County of Oxford to the corner of Windham Road 20 and Swimming Pool Road in the County of Norfolk. A map of the pipeline routes is included in Appendix A.

The requirements for and details of this report are outlined in the specific conditions issued by the Board in its Order dated May 17, 2018 as listed below. The Conditions of Approval can be found in Appendix B.

Accordingly, the purpose of this Post Construction Report is to fulfill these conditions.

1.0 Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with the OEB’s Decision and Order in EB-2018-0003 and these Conditions of Approval.

2.0 Union shall implement all the recommendations of the Environmental Report filed in the proceeding and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

4.0 *Union shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Union shall not make such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.*

6.0 *Both during and after construction, Union shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:*

a) a post construction report, within three months of the in-service date, which shall:

- i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 1;*
- ii. described any impact or outstanding concerns identified during construction;*
- iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of the construction;*
- iv. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions and:*
- v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences and certificates required to construct, operate and maintain the proposed project.*

b) a final monitoring report, no later than fifteen months after the in-service date or where the deadline falls between December 1 and May 31, following June 1, which shall:

- i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;*
- ii. describe the condition of any rehabilitated land;*
- iii. describe the effectiveness of any actions taken to prevent or mitigate and identified impacts of construction.*

- iv. *include the results of any analyses and monitoring programs and any recommendations arising therefrom; and*
- v. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions.*

2.0 BACKGROUND

Union was granted approval to construct the Oxford Reinforcement Project on May 17, 2018. Construction began on June 18, 2018 with the pipeline placed into service on October 4, 2018 and cleanup for the year completed on October 30, 2018.

Construction progressed from the corner of Potters Road and Baseline Road in the County of Oxford in a southerly direction to the corner of Windham Road 20 and Swimming Pool Road in the County of Norwich with the following order of operations: topsoil removal, stringing, welding, joint coating, directional drilling, trenching, lowering-in, tie-ins, backfilling, testing and clean-up.

Union will return to the right-of-way in spring 2019 to complete the following activities: repair any subsidence on the right-of-way, perform a general overview of the right-of-way and complete any additional clean-up that was required.

3.0 POTENTIAL IMPACTS AND MITIGATION

3.1 Condition 1.0

Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with the Board’s Decision and Order in EB-2015-0041 and these Conditions of Approval.

Union has complied with all conditions imposed by the Board during construction of the pipeline and has restored the land according to the evidence in support of its application.

3.2 Condition 3.0

Union shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.

Union has implemented all recommendations and mitigation measures outlined in the Environmental Study Report (ER) along with all directives identified by the OPCC.

3.3 Condition 4.0

Union shall advise the Board of any proposed change to Board-approved construction or restoration procedures. Except in an emergency, Union shall not make such change without prior notice to and written approval of the Board. In the event of an emergency, the Board shall be informed immediately after the fact.

There were no “Change Requests” issued during the project.

3.4 Condition 6.0

Both during and after construction, Union shall monitor the impacts of construction, and shall file with the Board one paper copy and one electronic (searchable PDF) version of each of the following reports:

- a) post construction report, within three months of the in-service date, which shall:*
 - i. provide a certification, by a senior executive of the company, of Union’s adherence to Condition;*

One paper copy and one electronic (searchable PDF) version of this Post Construction Report is provided to the Board. This report is certified by Mike Shannon, Vice President of Engineering, Construction and STO, confirming that Union has constructed the facilities and restored the land in accordance with the

Board's Decision and the Conditions of Approval in Order EB-2018-0003. The letter of certification can be found in Appendix C.

- ii. *described any impact or outstanding concerns identified during construction*
- iii. *describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of the construction;*

Table 1 summarizes the construction effects and general mitigation measures carried out during construction. All mitigation techniques used throughout construction will also be implemented during cleanup activities as required.

3.4.1 Monitoring Programs

3.4.1.1 Archaeological Assessment

Union retained the services of Aecom to conduct the Stage 1 and 2 archaeological assessment along the pipeline route. The survey identified no archaeological potential in the areas with the recommendation that no further archaeology assessment work would be required.

- iv. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions and:*

Union's Complaint Tracking System which identifies the current status of landowner complaints received as a result of pipeline construction, was in effect. A complaint is identified as a concern raised by a landowner that has not been resolved to the landowner's satisfaction within three (3) working days.

During construction, a few concerns were raised to Union and their Contractor. These issues were minor in nature and were dealt with by Union and the

Contractor in an expeditious manner. Union will continue to monitor the state of the land and environment and will address any additional landowner concerns if they should arise.

- v. *provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences and certificates required to construct, operate and maintain the proposed project.*

Mike Shannon, Vice President Engineering Construction and STO, has certified that the company has obtained all approvals, permits, licences, and certificates required to obstruct, operate and maintain the project and is confirmed by their signed letter of approval found in Appendix D.

Union Gas obtained the following environmental permits for construction:

❖ **Ministry of Tourism, Culture and Sport**

• **Letter of Compliance - File Number 0003737**

- b) *a final monitoring report, no later than fifteen months after the in-service date or where the deadline falls between December 1 and May 31, following June 1, which shall:*
 - i. *provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;*
 - ii. *describe the condition of any rehabilitated land;*
 - iii. *describe the effectiveness of any actions taken to prevent or mitigate and identified impacts of construction.*
 - iv. *include the results of any analyses and monitoring programs and any recommendations arising therefrom; and*
 - v. *include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rational for taking such actions and:*

A final monitoring report will be prepared to evaluate the success of the monitoring programs and if necessary outline areas in need of additional restoration as well as any outstanding issues if they should arise.

4.0 SUMMARY

This Post Construction Report has been prepared as per conditions in the Board Order EB-2018-0003. The report provides an outline of Unions' compliance with the commitments of its witnesses, the measures implemented during construction to minimize disturbance to the environment and a description of Unions' monitoring programs. It is anticipated that these measures will effectively eliminate any long-term impacts to the environment.

“Table 1”

Potential Impacts and Mitigation Measures

TABLE 1: MITIGATION SUMMARY

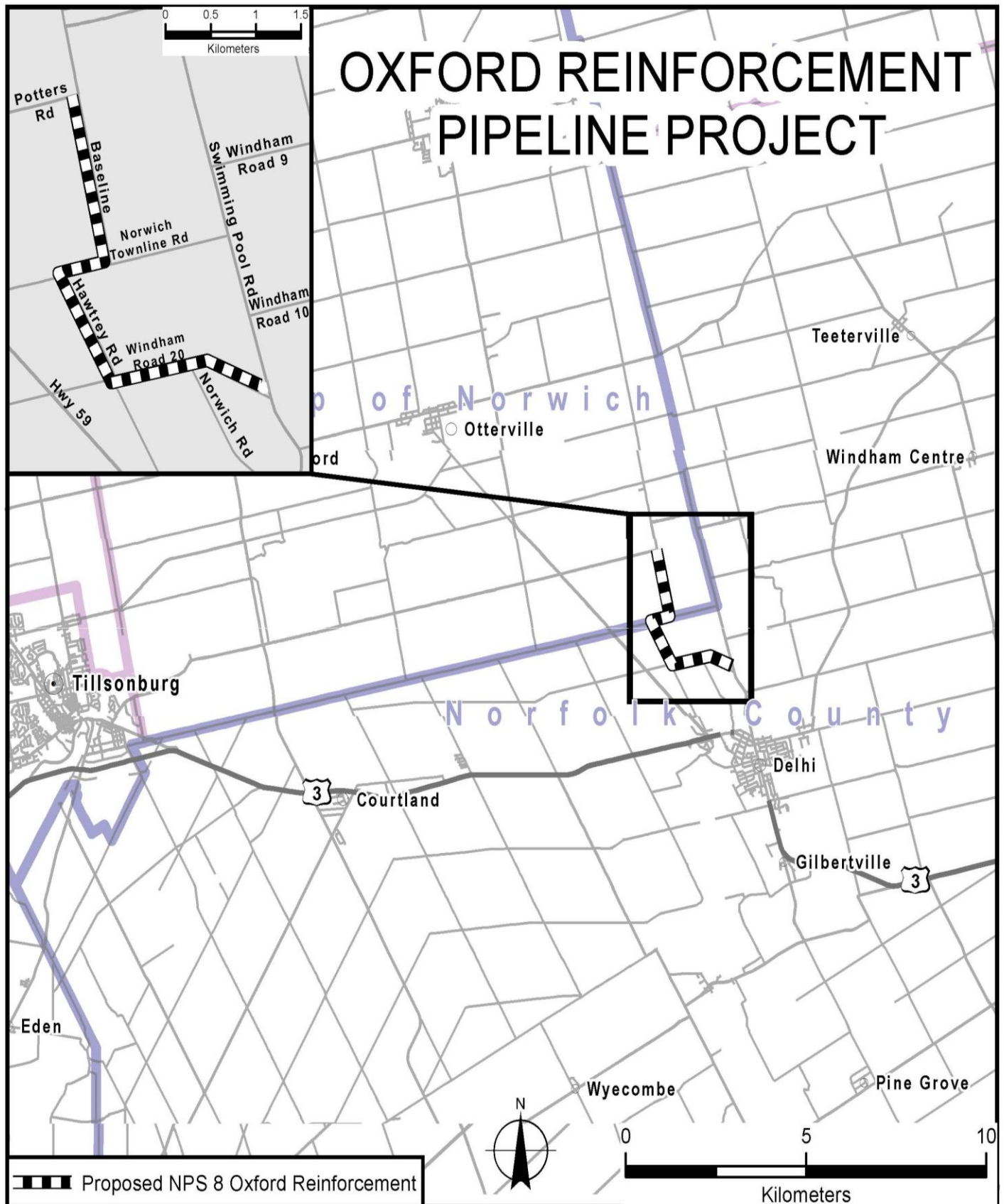
Issue	Potential Impact	Proposed Mitigation
a) Archaeology	Disturbance to cultural heritage resources.	<ul style="list-style-type: none"> • Prior to any activities associated with the project, a Stage 1 and Stage 2 archaeological assessment was completed. No artifacts were found during the survey or construction.
b) Species At Risk (SAR)	Encountering SAR	<ul style="list-style-type: none"> • Union employed the services of Neegan Burnside who contacted the Ministry of Natural Resources and Forestry concerning SAR. The MNRF recommended additional surveys in the spring of 2018 which were completed and accepted by the MNRF. • There were no SAR concerns encountered during construction
c) Landowner Concerns	Disruption to landowners	<ul style="list-style-type: none"> • Union provided the landowners with the telephone numbers of Company personnel. • A Landowner Relations Program was established to track complaints during construction. • To date there have been no complaints entered into the complaint tracking system.
d) Watercourses	Water quality concerns	<ul style="list-style-type: none"> • There were no watercourses encountered during the project and therefore no permit was required from the local conservation authority.
e) Road Side Ditches	Water quality concerns	<ul style="list-style-type: none"> • Ensured ditches were returned to pre-construction condition as quickly as possible.
f) Roadways	Disruption to local citizens and businesses	<ul style="list-style-type: none"> • At least one lane of traffic was maintained at all times. • Flag persons and warning devices were used to notify traffic of the construction zone.
g) Public Safety	Public safety concerns	<ul style="list-style-type: none"> • Company inspectors ensured public safety on construction site. • Ensured proper signage and flag persons if required.
h) Construction Equipment	Disruption to landowners and tenants	<ul style="list-style-type: none"> • Equipment was stored well off road shoulders when not in use.
i) Construction Noise	Disturbance to landowners and tenants	<ul style="list-style-type: none"> • Construction was carried out during daylight hours whenever possible. • Ensured equipment was properly muffled.
j) Fuel Storage and Handling	Improper fuel storage and handling may cause spillage and possible contamination of soil	<ul style="list-style-type: none"> • Fuel was not stored near watercourses (i.e. Within 50 metres) • Spill clean-up materials were stored on site and available in the event of a spill. Spills or leakage were to be reported to the appropriate authority immediately (Ministry of the Environment Spills Action Centre at 1-800-268-6060) • No reportable spills were recorded during construction

Appendix A

Location Map

GENERAL LOCATION MAP

2018 OXFORD REINFORCEMENT PROJECT



Appendix B

Conditions of Approval

Leave to Construct Conditions of Approval
Application under Section 90 of the OEB Act
Union Gas Limited
EB-2018-0003

1. Union Gas Limited (Union) shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2018-0003 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued, unless construction has commenced prior to that date.

(b) Union shall give the OEB notice in writing:
 - i. of the commencement of construction, at least ten days prior to the date construction commences;
 - ii. of the planned in-service date, at least ten days prior to the date the facilities go into service;
 - iii. of the date on which construction was completed, no later than 10 days following the completion of construction; and
 - iv. of the in-service date, no later than 10 days after the facilities go into service.
3. Union shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
4. Union shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Union shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
5. Concurrent with the final monitoring report referred to in Condition 6(b), Union shall file a Post Construction Financial Report, which shall indicate the actual capital costs of the project and shall provide an explanation for any significant variances from the cost estimates filed in this proceeding. Union shall also file a copy of the Post Construction Financial Report in the proceeding where the actual capital costs of the project are proposed to be included in rate base or any proceeding where Union proposes to start collecting revenues associated with the project - whichever is earlier.

6. Both during and after construction, Union shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:
- a) a post construction report, within three months of the in-service date, which shall:
 - i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 1;
 - ii. describe any impacts and outstanding concerns identified during construction;
 - iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;
 - iv. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and
 - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.
 - b) a final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
 - i. provide a certification, by a senior executive of the company, of Union's adherence to Condition 3;
 - ii. describe the condition of any rehabilitated land;
 - iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;
 - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom; and
 - v. include a log of all complaints received by Union, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions.

Appendix C

Executive Certification



2018 OXFORD REINFORCEMENT PROJECT
EB-2018-0003

I hereby certify Union Gas Limited has complied the Decision and Order, Schedule B, EB-2018-0003, Section 6 (a) (i).

2018 NOV 30

Date

A handwritten signature in blue ink, consisting of a stylized 'U' followed by a horizontal line.

Senior Executive

Condition 6 a) i.

- a) a post construction report, within three months of the in-service date, which shall:
 - i. Provide a certification, by a senior executive of the company, of Union's adherence to Condition 1;

Condition 1

Union Gas Limited (Union) shall construct the facilities and restore the land in accordance with the Board's Decision and Order in EB-2018-0003 and these Conditions of Approval.



2018 OXFORD REINFORCEMENT PROJECT
EB-2018-0003

I hereby certify Union Gas Limited has complied the Decision and Order, Appendix B, EB-2018-0003 Section 6 (a) (v).

2018 Nov 30

Date

A handwritten signature in blue ink, consisting of a series of loops and a long horizontal stroke.

Senior Executive

Condition 6 (a) (v).

- a) a post construction report, within three months of the in-service date, which shall:
- v. Provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate and maintain the proposed project.