



Enbridge
50 Keil Drive N.
Chatham, Ontario, Canada
N7M 5M1

April 24, 2019

BY RESS & COURIER

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

**Re: Enbridge Gas Inc. ("Enbridge Gas")
2019 Community Expansion Chippewas
EB-2019-0139**

Enclosed please find two copies of Enbridge Gas's application and pre-filed evidence for the above-noted project.

On May 7, 2018 Union Gas Limited ("Union") filed an Application EB-2018-0142 with the Ontario Energy Board ("OEB"), for orders pursuant to Sections 36 (1) and 90 of the Ontario Energy Board Act, to construct three Community Expansion Projects, Chippewas of the Thames First Nation, North Bay Northshore and Peninsula Roads, and Saugeen First Nation. On November 29, 2018, the OEB placed the proceeding in abeyance due to the loss of funding. This Section 36 application is only for the Chippewas of the Thames First Nations Project. The EB-2018-0142 application will be updated later in 2019 for North Bay Northshore and Peninsula Road and Saugeen First Nation.

Union and Enbridge Gas Distribution amalgamated effective January 1, 2019 to become Enbridge Gas Inc. ("Enbridge Gas").

In the event that you have any questions on the above or would like to discuss in more detail, please do not hesitate to contact me.

Yours truly,

[original signed by]

W.T. (Bill) Wachsmuth, RPF
Senior Administrator, Regulatory Projects
:sb
Attach.

cc: N. Marconi
Z. Cronojacki
A. Manzano
Regulatory Library

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 an Application by Enbridge Gas Inc. for an Order or Orders for approval of Enbridge Gas Inc. to construct natural gas pipelines and ancillary facilities required to serve the community of the Chippewas of the Thames First Nation;

APPLICATION

1. Enbridge Gas Inc. (“Enbridge Gas”) is a business corporation incorporated under the laws of the province of Ontario, with its head office in the City of Toronto.
2. Union and Enbridge Gas Distribution amalgamated effective January 1, 2019 to become Enbridge Gas.
3. This Community Expansion Project is in response to the Ontario Energy Board’s (“the Board”) initiative to address the Ontario government’s desire to expand natural gas distribution systems to communities that currently do not have access to natural gas. The parameters of Enbridge Gas’s proposals are designed to meet the minimum economic feasibility criteria as defined in EB-2016-0004, the Board’s Generic Community Expansion proceeding.
4. This application will allow Enbridge Gas to construct natural gas pipelines and ancillary facilities required to serve the community of the Chippewas of the Thames First Nation. A map showing the proposed service area can be found at Schedule A.
5. Enbridge Gas hereby applies to the Board pursuant to section 36 of the *Ontario Energy Board Act*, 1998 (“the Act”) for an order or orders granting:

- a. Approval of a System Expansion Surcharge (“SES”) rate for the Chippewas of the Thames First Nation Community Expansion Project.
6. A leave to construct application is not required for the proposed facilities to serve the Chippewas of the Thames First Nation as it does not meet the thresholds required for a leave to construct application .
7. Enbridge Gas further applies to the Board for all necessary orders and directions concerning pre-hearing and hearing procedures for the determination of this application.
8. This application is supported by written evidence which may be amended from time to time as circumstances may require.
9. The persons affected by this application are the customers resident or located in the municipalities, police villages and First Nations reserves served by Enbridge Gas, together with those to whom Enbridge Gas sells gas, or on whose behalf Enbridge Gas distributes, transmits or stores gas. It is impractical to set out in this application the names and addresses of such persons because they are too numerous.

10. The address of service for Enbridge Gas is:

Enbridge Gas Inc.
P.O. Box 2001
50 Keil Drive North
Chatham, Ontario
N7M 5M1

Attention: W.T. (Bill) Wachsmuth, RPF
Senior Administrator, Regulatory Projects
Telephone: (519) 436-5457
Fax: (519) 436-4641

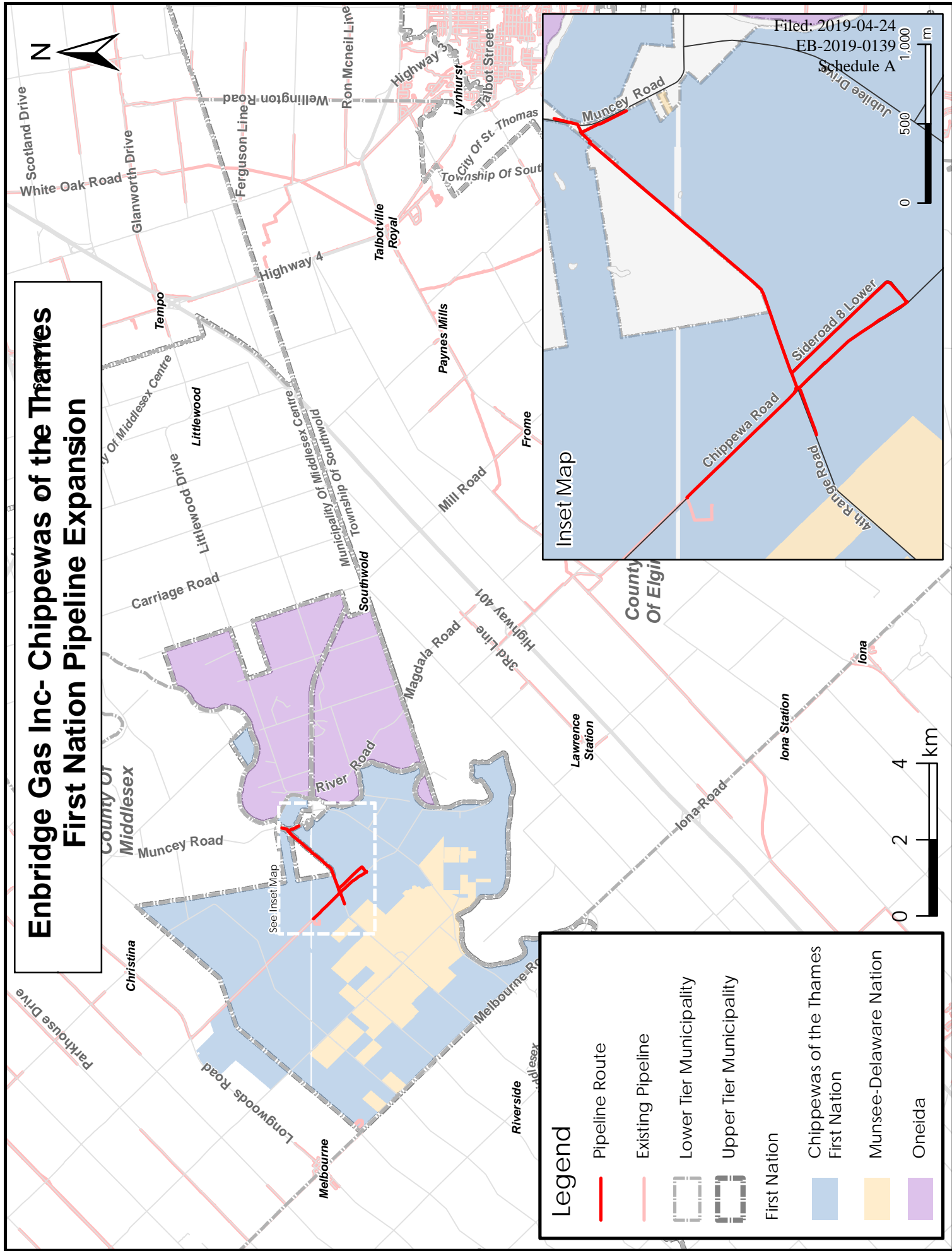
DATED April 24, 2019.

ENBRIDGE GAS INC.

[Original signed by]

W.T. (Bill) Wachsmuth, RPF
Senior Administrator, Regulatory Projects

Enbridge Gas Inc- Chippewas of the Thames First Nation Pipeline Expansion



ENBRIDGE GAS INC.

CHIPPEWAS OF THE THAMES FIRST NATION PROJECT

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BACKGROUND INFORMATION

1. On May 7, 2018 Union Gas Limited (“Union”) filed an Application EB-2018-0142 with the Ontario Energy Board (“OEB”), for orders pursuant to Sections 36 (1) and 90 of the Ontario Energy Board Act, to construct three Community Expansion Projects, Chippewas of the Thames First Nation, North Bay Northshore and Peninsula Roads, and Saugeen First Nation. This Section 36 application is only for the Chippewas of the Thames First Nations Project (“Proposed Project”). A second application will be made later in 2019 for North Bay Northshore and Peninsula Road and Saugeen First Nation.
2. Union and Enbridge Gas Distribution amalgamated effective January 1, 2019 to become Enbridge Gas Inc. (“Enbridge Gas”).
3. On December 8, 2017, under the Province of Ontario Natural Gas Grant Program (“NGGP”) the Ministry of Infrastructure agreed to provide \$1,425,221 in capital funding support for the Proposed Project.
4. On September 26, 2018, Union was informed by the Ministry of Infrastructure that funding under the NGGP would not be available for the Community Expansion Projects.
5. On November 29, 2018, Union was informed by the Board that the proceeding was placed in abeyance due to the loss of the funding.
6. On December 6, 2018, Access to Natural Gas Act Bill 32/Ontario Regulation 24/19 Expansion of Natural Gas Distribution Systems received Royal Assent¹.
7. On March 11, 2019, Enbridge Gas was informed that \$1,430,000 of funding for the Proposed Project would be available under the Access to Natural Gas Act (Bill 32), and the publication of Ontario Regulation 24/19 Expansion of Natural Gas Distribution Systems.

¹ See <https://www.ola.org/en/legislative-business/bills/parliament-42/session-1/bill-32/status>

8. With the above changes Enbridge Gas is now able to mitigate the economic impact of losing the \$1,425,221 in NGGP funding and preserve the Proposed Project economics with a Profitability Index of 1.0.
9. Union's original evidence has been updated below to reflect these changes.

PROPOSED RATES

10. Enbridge Gas's proposal to serve the Chippewas of the Thames First Nation consists of the following two rate components:
 - Applicable rates from Enbridge Gas's Rate M1 and M2 rate schedules, and as amended from time to time, will apply to customers in the Proposed Project Area.
 - A System Expansion Surcharge will be applied to customers for a 40 year period², to enable the new general service customers to contribute additional funds towards the economic feasibility of the Proposed Project in excess of the funds derived from existing rate schedules³. Details are provided below.

System Expansion Surcharge ("SES")

Description

11. Enbridge Gas proposes the extension of the single, volumetric-based SES⁴, as approved by the Board in EB-2015-0179, to the Proposed Project Area. This mechanism provides a means for customers to be served by the Proposed Project to contribute a portion of their annual savings toward natural gas system expansion feasibility. When customers served by the Proposed Project convert to natural gas, they will pay the SES for a defined period of time of up to 40 years⁵ as a contribution toward recovery of the cost of the Proposed Project. The proposed SES is consistent with the Board's view that "*An incumbent utility with existing rates may still propose to collect a*

² A 40 year SES term is required the Proposed Project to reach a P.I. of 1.0 after including funding as CIAC.

³ If a residential customer's service length is greater than 30 m from property line to meter location, in addition to the above, an excess footage charge of \$45.00/m plus HST will be assessed, consistent with current practice.

⁴ SES and term collectively referred to as "SES Rate"

⁵ A customer who connects after year 1 will only be required to pay SES for the remaining balance of the 40 year term.

surcharge over and above those rates to make up for the shortfall in revenues to cover the cost of expansion”⁶.

12. The SES will appear on an expansion area customer’s monthly bill as an extra line item, labelled “*System Expansion Surcharge*”. For clarity, this line item will be in addition to other current gas bill line items, including for example charges for commodity, transportation, storage, delivery, and the fixed monthly charge, which are identified in current approved rate schedules. Potential customers will be informed of the details of the SES charge as the Proposed Project is developed, as well as at the time their application to Enbridge Gas for service is made. For customers who wish to equalize their monthly payments, Enbridge Gas’s equal billing plan will be extended to include the SES.
13. Consistent with the EB-2015-0179 Decision, SES will be treated as revenue for purposes of economic feasibility analysis of the Proposed Project.

Applicability

14. The SES will be applied to all general service customers (Rates M1 and M2) attaching to mains installed as part of the Proposed Project until the SES term for the Proposed Project expires. In the event that a customer who is paying the SES sells their home or business, the SES will continue to apply for its original term to the new owner of that home or business. For clarity, a customer who attaches to facilities installed as part of the Proposed Project a number of years after the Proposed Project enters service will also be required to pay the SES for the remaining portion of the SES term.
15. There are no potential customers in the Proposed Project Area that meet eligibility criteria for Enbridge Gas’s contract rate classes.
16. To the extent that further extensions to the Community Expansion pipeline systems as proposed in this application are made, Enbridge Gas proposes that at a minimum the SES applicable to the Proposed Project would be applied to customers attaching to those future extensions. This is

⁶ EB-2016-0004 Decision with Reasons, p. 21.

consistent with the EB-2015-0179 provisions⁷.

Rate

17. Enbridge Gas proposes that the SES be set at \$0.23/m³, consistent with EB-2015-0179. Application of the SES at this level allows for annual savings when converting a typical home from competing primary fuel types. Enbridge Gas validated surcharges at this level were acceptable for potential customers for the EB-2015-0179 projects. Further, Enbridge Gas included the surcharge in savings estimates referenced in telephone or door-to-door surveys for the Proposed Project Area in this application in 2018, and determined forecasted attachments based on the results of these surveys. For these reasons, Enbridge Gas submits that the SES of \$0.23/m³ remains appropriate for the Proposed Project⁸.
18. The SES will be fixed at \$0.23/m³ throughout the duration of the SES term. Enbridge Gas proposes that this approach meets the Board requirement for “*a minimum rate stability period of 10 years (for example)*”⁹. While the SES for applicable customers will be added to the Rate M1 and M2 charges on each bill, and the existing rates may change over time, a fixed SES rate provides a large measure of stability for periods of longer than 10 years.

Term

19. Consistent with EB-2015-0179, the SES term will begin when the Proposed Project goes into service, and expire at the end of the calendar year required for the Proposed Project to meet a P.I. of 1.0. For the Proposed Project in this application the SES term will extend for the full economic life of the Proposed Project, since a full 40 year term is required to reach the minimum P.I. of 1.0¹⁰. Every general service customer who connects to the system will be subject to the SES from the date of their connection until the end of the term. At the end of the defined term, the SES will be terminated for every customer attached to the Proposed Project, regardless of when the customer connected to the Proposed Project.

7 EB-2015-0179 Exhibit A, Tab 1 Addendum, p. 8.

8 Enbridge Gas Distribution also obtained OEB approval for \$0.23/m³ for the Fenelon Falls project in EB-2017-0147.

9 EB-2016-0004 Decision with Reasons, p. 20.

10 Any project proposed under the alternative rate framework provided by EB-2016-0004 is required to meet a minimum P.I. of 1.0 in order to ensure that no subsidy from existing customers occurs. See p.19 of the EB-2016-0004 Decision with Reasons.

20. To the extent any further extensions to the pipeline systems proposed in this application are made, at a minimum Enbridge Gas proposes that the approved SES term for the Proposed Project be applied to customers attaching to those future extensions. However, the term for future extension customers may be extended beyond the initial term, and/or Contribution in Aid of Construction (“CIAC”) may be assessed, if necessary for the future extension to meet a minimum P.I. of 1.0.

Requested Board Approvals

21. Enbridge Gas is proposing that for the Proposed Project Area, the Board approve the SES rate (amount and term) as shown in Table 1.

Table 1: SES Rate Approvals

Project	SES Rate	SES Term Expiry¹¹
Chippewas of the Thames First Nation	\$0.23/m ³	December 31, 2059

22. Enbridge Gas proposes that the details above be included in the Rate M1 and M2 rate schedules.

Rate Stability Period

23. Enbridge Gas proposes that the Rate Stability Period for the Proposed Project be 10 years. This is consistent with the Board requirement for “a minimum rate stability period of 10 years (for example)”¹². During this period, Enbridge Gas will bear the risk associated with variances between forecast and actual customer attachments, and their associated revenues.

INTRODUCTION

24. First Nation Officials, Residents, and Business Owners in the Chippewas of the Thames First Nation southwest of London, in Middlesex County, have requested natural gas service from Enbridge Gas.

¹¹ SES Term Expiry dates are contingent on the proposed project being constructed in 2019.

¹² EB-2016-0004 Decision with Reasons, p. 20.

25. This Proposed Project does not require Leave to Construct approval. In order to provide the OEB with information about this Proposed Project, Enbridge Gas has prepared an information package describing the Proposed Project. The Proposed Project will serve the Chippewas of the Thames First Nation and the Municipality of Strathroy-Caradoc. Enbridge Gas is requesting an order from the OEB pursuant to section 36 (1) of the Ontario Energy Board Act, as described in earlier sections of this evidence.
26. A map showing the Proposed Facilities from a starting point on Enbridge Gas's existing distribution system that currently serves a portion of the Chippewas of the Thames First Nation can be found at Schedule 1.
27. Additionally, Enbridge Gas is also planning to develop a local distribution network which will serve approximately 20 customers in the first year of the Proposed Project. These customers are not known at the time of the filing. Detailed maps of the service area will be finalized prior to construction.
28. Enbridge Gas currently holds a Certificate of Public Convenience and Necessity (EB-2009-0169) and Franchise Agreement (EB-2009-0168), for the Municipality of Strathroy-Caradoc. Enbridge Gas currently holds a Certificate of Public Convenience and Necessity (EB-2008-0309) and Franchise Agreement (EB-2008-0308), for the County of Middlesex. Enbridge Gas has obtained a Section 28 (2) permit from Indigenous and Northern Affairs Canada ("INAC") to extend the pipeline within the Chippewas of the Thames First Nation.
29. The route of the Proposed Facilities was selected in order to optimize economic benefits and social features while minimizing environmental impacts.
30. In March and April of 2019, Enbridge Gas resumed discussions regarding the Proposed Project with First Nations officials of the Chippewas of the Thames First Nation. These officials have not identified any concerns with the Proposed Project and support construction of the Proposed Facilities in 2019.

31. If this application is approved, Enbridge Gas forecasts that 45 customers in the Proposed Project Area will have natural gas service by year 10 of the Proposed Project.
32. The total 10 year capital cost of the Proposed Project is approximately \$1,863,000 minus the government grant to equate to approximately \$433,000 net investment for Enbridge Gas.
33. The Proposed Project has a net present value ("NPV") of \$0 and a profitability index ("PI") of 1.0.
34. An Environmental Protection Plan ("EPP") for the Proposed Project has been prepared by Enbridge Gas's Environmental Planning Department. Enbridge Gas's standard construction procedures, combined with the appropriate supplemental mitigation measures recommended in the EPP will be employed to address environmental and public concerns.
35. Construction of the Proposed Facilities is expected to begin in September of 2019 and be in-service by November 2019. Enbridge Gas requests OEB approval in August 2019.
36. The pipeline facilities have been sized to meet the 10 year forecast future growth proposed in the Chippewas of the Thames First Nation Proposed Project Area.

MARKET PROFILE

Community Profile

37. The Proposed Project Area includes residents and businesses in the Chippewas of the Thames First Nation and customers along the Proposed Facilities in the east section of the Chippewas of the Thames First Nation.
38. The Chippewas of the Thames First Nation is located in Middlesex County, southwest of London Ontario. As of 2013, the Chippewas of the Thames First Nation had a population of 2420 with 896 people living on the reserve.
39. The Chippewas of the Thames First Nation served by this Proposed Project will predominately

encompass residential dwellings.

40. There are currently a total of 55 existing residential dwellings and 2 commercial establishments in the Proposed Project Area which could potentially be served with natural gas.

Residential Questionnaires

41. A door to door questionnaire was completed for the private residences in the Proposed Project Area. The questionnaire informed residents about the Proposed Project, estimates of the cost to convert to natural gas, and information regarding a surcharge to contribute towards the cost of the Proposed Project. The questionnaire also requested information pertaining to dwelling characteristics, use of dwelling, current fuel type and interest in converting to natural gas-fuelled appliances.
42. Of the 23 potential privately owned residential customers in the Proposed Project Area, 13 have completed the door to door questionnaire.

Customer Attachment Forecast

43. Enbridge Gas is forecasting a total of 43 existing residential and 2 small commercial customers will be attached by the tenth year of the Proposed Project as outlined in the customer attachment forecast in Schedule 2.
44. For the Top 3 box scores (extremely likely, very likely, and likely to convert), the results of the door to door questionnaire described above indicate that 48% of the people surveyed are interested in obtaining natural gas service. The door to door questionnaire provided residents information about the additional surcharge.
45. Enbridge Gas asked participants of the questionnaire, who were interested in converting, the timing of when they would attach, and 85% indicated they would do so in the first three years. Enbridge Gas has taken a conservative approach and has spread the privately owned attachments over 10 years using the same approach as that applied to recent community expansion projects such as Milverton, Rostock Wartburg (EB-2015-0179).

46. Enbridge Gas has received confirmation from the Band that all 34 Band owned properties are expected to be converted within the first two years of the Proposed Project. This is reflected in the attachment forecast found at Schedule 2.
47. Enbridge Gas has received support from the Chippewas of the Thames First Nation. A Band Council Resolution in support of the Proposed Project is included at Schedule 3.

PROPOSED FACILITIES

48. The pipeline will connect to the existing distribution system that already serves a portion of the Chippewas of the Thames First Nation. A drawing showing the Proposed Project is provided at Schedule 4.
49. The pipelines identified above have been sized to meet the 10 year forecast in the Proposed Project Area.

PROJECT COSTS

50. The total estimated 10 year capital cost for the Proposed Project is approximately \$1,863,000. This cost includes all pipeline costs of \$1,708,000 and the cost of services of \$155,000 for the first 10 years of the Proposed Project. The Government Grant of \$1,430,000 will offset the year one cost for a net capital investment by Enbridge Gas of \$433,000 over the 10 years.
51. Estimates of the first year capital costs for the construction of the Proposed Facilities are provided at Schedule 5a. The ten year capital costs can be found in Schedule 5b. The estimated costs cover all costs related to materials, construction and labour. This figure also includes estimated environmental costs.

ECONOMIC FEASIBILITY

52. The Proposed Facilities are required in order to expand natural gas distribution to the Chippewas of the Thames First Nation.

53. A standalone Discounted Cash Flow (“DCF”) analysis was completed for the proposed expansion. Enbridge Gas has employed an economic feasibility test consistent with the Board’s recommendations in the E.B.O. 188 Report on Natural Gas System Expansion.
54. The DCF for Chippewas of the Thames First Nation can be found at Schedule 6. This Schedule indicates a NPV of \$0 and PI of 1.0.
55. Enbridge Gas received funding from the Province of Ontario to support this Proposed Project. The DCF analysis includes \$1,430,000 of Bill 32 funding, which is equal to the original maximum NGGP grant level awarded by the Province. This funding will be treated as a CIAC in 2019. The net capital of the Proposed Project for 10 years is \$433,000.
56. The DCF revenues include the System Expansion Surcharge (“SES”) of \$0.23/m³ for 40 years and the payments offsetting Payment In Lieu of Taxes (“PILT”) of \$4,784 per year for a period of 10 years.
57. Schedule 7 provides the key inputs, parameters and assumptions used in completing the DCF analysis.

DESIGN AND CONSTRUCTION

Design and Pipe Specifications

58. The design and pipe specifications are outlined at Schedule 8. All the design specifications are in accordance with the *Ontario Regulations 210/01* under the *Technical Standards and Safety Act 2000, Oil and Gas Pipeline Systems*. This is the regulation governing the installation of pipelines in the Province of Ontario.
59. All polyethylene pipe and fittings will be manufactured and certified in accordance with the *Canadian Standards Association B137.4-17 Polyethylene (PE) Piping systems for Gas Services*. The pipe specifications are designed to provide the maximum operating pressure of 550 kPa. The pipeline will be tested in accordance with the requirements of the Ontario Regulation.

60. The minimum depth of cover to the top of the pipe and pipe appurtenances will be in accordance with the requirements of *Clause 12.4.7, Clause 12.4.8 of the CSA Z662-15* for polyethylene piping. Additional depth will be provided to accommodate existing or planned underground facilities, or where greater depth of excavation is warranted.

Construction Procedures and Project Schedule

61. The Proposed Facilities will be constructed using Enbridge Gas's standard practices and procedures and will be in compliance with the mitigation measures identified in the Environmental Protection Plan ("EPP"). Schedule 9 provides a summary of Enbridge Gas's standard construction methods. Enbridge Gas's construction procedures are continually updated and refined to minimize potential impacts to the lands and the public.
62. Material is readily available for the Proposed Project and Enbridge Gas foresees no problem in obtaining a contractor to complete the proposed construction. The EPP will be provided to the contractor.
63. Schedule 10 provides the proposed construction schedule for the Proposed Project. Construction of the Proposed Facilities is expected to begin in September of 2019 and continue through to November 2019.
64. Approvals in regard to detailed construction procedures are pending from the Chippewas of the Thames First Nation and Municipality of Strathroy-Caradoc, Ministry of Tourism – Culture and Sport, The Ministry of Natural Resources and Forestry, and County of Middlesex.

ENVIRONMENTAL MATTERS

65. An EPP for the proposed pipeline was prepared by Enbridge Gas's Environmental Planning Department. The EPP was prepared to meet the intent of the Board's document *"Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario"* (7th Edition, 2016). A copy of the EPP is provided as Schedule 11.
66. The objectives of the EPP are to:

- a) document existing environmental features;
- b) identify agency, Indigenous, and public concerns;
- c) identify potential environmental impacts as a result of construction;
- d) present mitigation techniques to minimize environmental impacts; and
- e) provide pipeline contractors and environmental inspectors involved in the construction of the pipeline with general and site-specific guidelines for environmental protection that supplement Enbridge Gas's construction specifications.

67. All pipelines will be constructed in the manner recommended and described in the Board document *"Environmental Guidelines for Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario"* (7th Edition, 2016).
68. A copy of the EPP has been submitted to the Ontario Pipeline Coordinating Committee ("OPCC"), local municipalities, government agencies and Indigenous communities. A summary of comments and Enbridge Gas's responses is provided in Schedule 12 and there are no outstanding concerns.
69. There are a number of watercourse crossings associated with the Proposed Project. The proposed methods of crossing these watercourses have been reviewed with the Chippewas of the Thames First Nation.
70. When the Proposed Project is constructed, the most up-to-date construction specifications will be followed.
71. Enbridge Gas will ensure that the recommendations in the EPP, commitments and the conditions of approval are followed. An environmental inspector will be assigned to the Proposed Project to ensure that all activities comply with all of the Board's conditions of approval.
72. The results of the EPP indicate that the environmental and socio-economic effects associated with construction of the Proposed Project are generally short-term in nature and minimal. There

are no significant cumulative effects as a result of this pipeline construction.

73. After the EPP was submitted to the OPCC for review in April 2018, Enbridge Gas retained an independent third party consultant to review the pipeline route and complete a Natural Heritage Study to ensure all sensitive environmental features were identified. Field surveys were conducted in August 2018 and mitigation measures were developed to ensure the natural environment and species at risk/species at risk habitat are protected during construction. Enbridge Gas will adhere to the mitigation measures recommended in the Study, and it is anticipated that the implementation of such mitigation measures as well as the implementation of the mitigation measures described in the EPP will effectively eliminate any long-term impacts to the environment.
74. Enbridge Gas retained a licensed Archaeologist to complete an Archaeological Assessment for the Proposed Project. The Archaeological Assessment Report concluded that the Proposed Project Area should be considered free of archaeological concern and no further assessment is recommended. The Report was submitted to the Ministry of Tourism, Culture and Sport on June 20, 2018 and approval was received on April 2, 2019. If the extent of the Proposed Project Area changes to incorporate lands not addressed in the Report, further assessment will be required.
75. Enbridge Gas retained a Cultural Heritage Specialist to complete a Cultural Heritage Study for the Proposed Project. The field study was completed in March 2019 and the report concluded that the Proposed Project is not anticipated to have adverse impacts on cultural heritage resources. The report was sent to the Ministry of Tourism, Culture and Sport on April 2, 2019.

LAND MATTERS

76. The Proposed Pipelines will be located within road allowances.
77. A distribution station will not be required for this Proposed Project.
78. No permanent or temporary land rights are required to construct the Proposed Facilities.

INDIGENOUS CONSULTATION

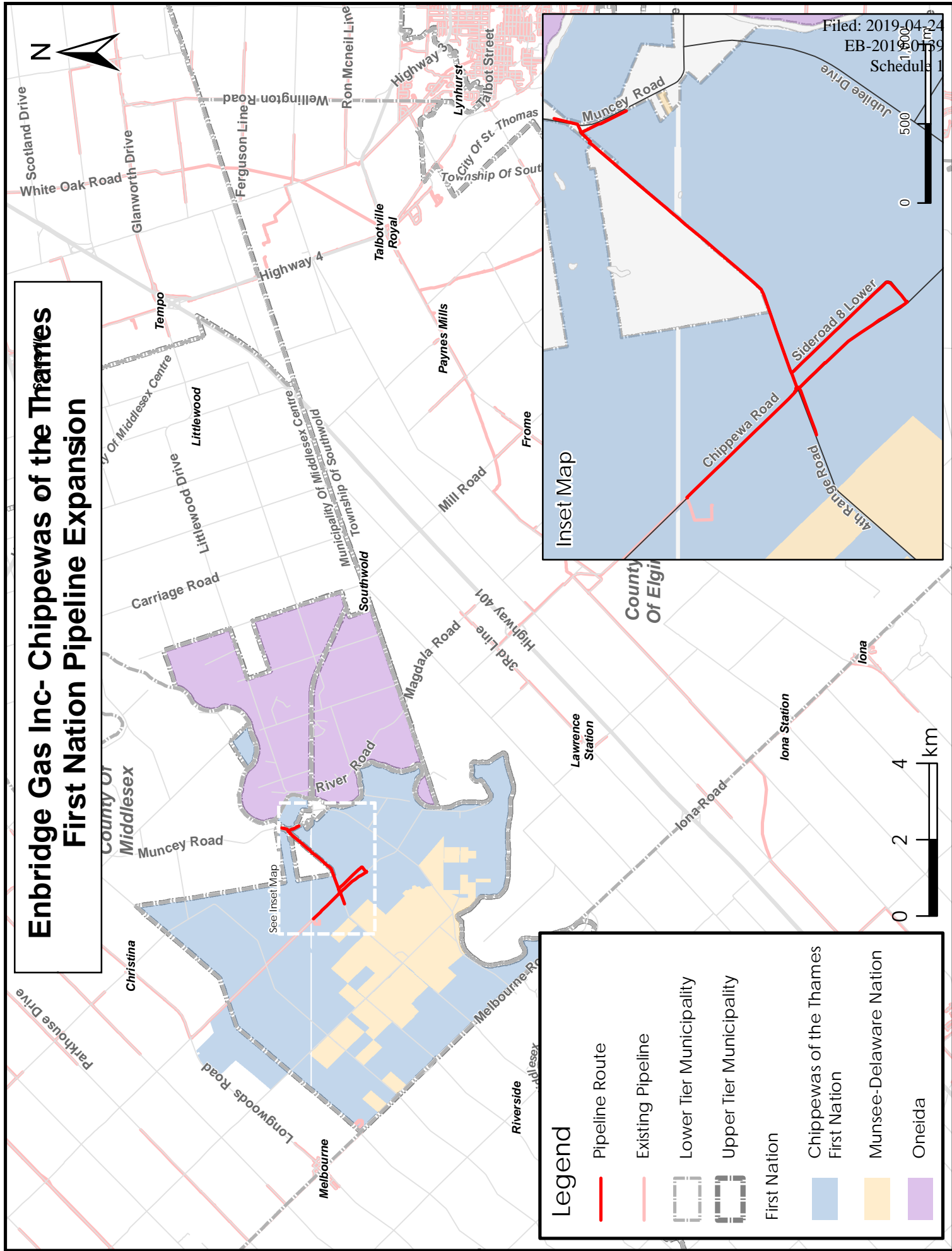
79. Once Enbridge Gas was able to confirm that funding would be available for the Proposed Facilities Enbridge Gas resumed discussions with First Nations officials of the Chippewas of the Thames First Nation. These officials have not identified any concerns with the Proposed Project and support construction of the Proposed Facilities in 2019.
80. Enbridge Gas has an extensive database and knowledge of Indigenous and Métis Nation organizations in Ontario and consults with the Tribal organizations and the data bases of the Ontario Ministry of Natural Resource and Forestry, Ontario Ministry of Indigenous Affairs and Reconciliation, as well as Indigenous Affairs and Northern Development Canada to ensure consultation is carried out with the most appropriate groups.
81. Enbridge Gas has signed a General Relationship Agreement with the Métis Nation of Ontario which describes Enbridge Gas's commitments to the Métis Nation when planning and constructing pipeline projects.
82. In the 7th Edition of the Ontario Energy Board's Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, the requirements for Indigenous and Métis consultation were enhanced.
83. The Board, working closely with the Ontario Ministry of Energy ("MOE"), revised the Indigenous consultation requirements to streamline and clarify the roles and obligations of the MOE, the Board and Enbridge Gas.
84. Included in the Indigenous Consultation Report is a letter from Enbridge Gas to the MOE, providing the MOE with a project description and requesting the MOE identify any Indigenous communities who may be impacted by the Proposed Project.
85. Included in the Indigenous Consultation Report is a letter from the MOE to Enbridge Gas identifying which Indigenous communities will be impacted by the Proposed Project and formally delegating Enbridge Gas the responsibility to conduct consultation activities.

86. Attached at Schedule 13 is a copy of Enbridge Gas's Indigenous Consultation Report for the Proposed Project. The Indigenous Consultation Report includes:

- A summary of all meetings with Indigenous communities to date;
- A summary of the concerns that were identified by the Indigenous communities and how the concerns were, or plan to be addressed and/or accommodated; and
- A complete record of all consultation activities to date.

87. Schedule 14 provides a copy of the Ministry of Energy of Northern Development and Mines review and confirmation of adequacy of Enbridge Gas's Indigenous Consultation Report.

Enbridge Gas Inc- Chippewas of the Thames First Nation Pipeline Expansion



Chippewas of the Thames First Nation

Classification	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Total	Ultimate Potential	Total Attachments % Potential
Residential Conversion - Privately Owned	2	2	1	1	1	1	1	1	1	0	11	23	48%
Residential Conversion - Band Owned	16	16	0	0	0	0	0	0	0	0	32	32	100%
Small Commercial - Band Owned	2	0	0	0	0	0	0	0	0	0	2	2	100%
Total	20	18	1	1	1	1	1	1	1	0	45	57	79%



Filed: 2019-04-24
EB-2019-0139
Schedule 3

Chippewas of the Thames First Nation

BAND COUNCIL RESOLUTION RÉSOLUTION DE CONSEIL DE BANDE				Chronological no. –No consécutif 2017 - 2018/51	
Date of duly convened meeting Date de l'assemblée dument convoquée	D-J 1 6	M 0 3	Y-A 1 8	Province Ontario	File reference no. –No de référence du dossier Natural Gas Expansion Project

DO HEREBY RESOLVE:
DECIDE, PAR LES PRESENTES:

WHEREAS, access to natural gas infrastructure is not available in all areas of the Chippewas of the Thames First Nation and additional access will provide more affordable and reliable energy and;

WHEREAS, expanding access to natural gas with Chippewas of the Thames First Nation is a key strategic priority supported by Council and;

WHEREAS, access to natural gas for residents and businesses within our community will provide an economic advantage and;

WHEREAS, Natural gas access can provide residents on higher-emitting fuels with a lower carbon energy source that will help reduce greenhouse gas emissions and;

We do hereby resolve:

That this Council of the Chippewas of the Thames First Nation supports making a financial contribution towards the project in an amount equivalent to the Payment In Lieu of Taxes that would be recovered on the new natural gas infrastructure for [redacted] for a period of up to 10 years as per the natural gas grant program requirement and;

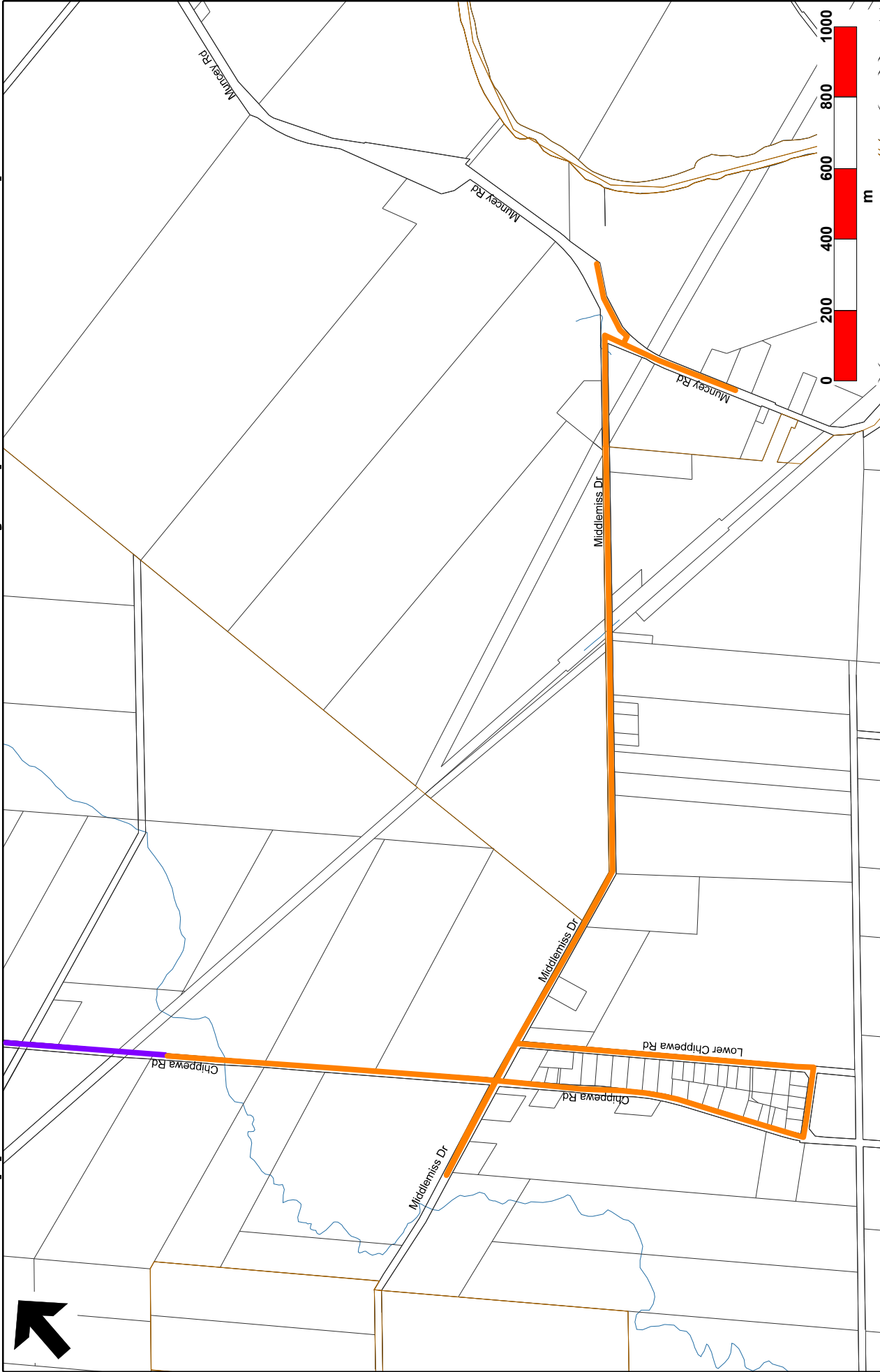
That this Council of the Chippewas of the Thames First Nation supports that a system expansion surcharge of [redacted] cents per cubic meter from every customer, in the project area for up to 40 years, will be required to assist with the cost of extending natural gas within our community, noting that there will be significant energy savings to our community for our heating needs and;

That this Council of the Chippewas of the Thames First Nation supports conversion of the existing band owned buildings in the 2 years after the project is completed.

Quorum, [redacted]	[redacted]	[redacted]
[redacted]	(Chief, A. M yeengun Henry)	[redacted]
(Councillor, Denise Beeswax)	[redacted]	(Councillor, Kodi Chrisjohn)
[redacted]	(Councillor, Mchelle Burch)	[redacted]
(Councillor, Beverly Deleary)	[redacted]	(Councillor, Jacqueline French)
[redacted]	(Councillor, Raymond Déleay)	[redacted]
(Councillor, Larry French)	[redacted]	(Councillor, Carolyn Henry)
[redacted]	(Councillor, Randleigh Grosbeck)	[redacted]
(Councillor, Warren Huff)	(Councillor, Leland Sturgeon)	(Councillor, Darlene Whitecalf)

FOR DEPARTMENTAL USE ONLY - RÉSERVE AU MINISTÈRE					
Expenditure - Dépenses	Authority (Indian Act Section) Autorité (Article de la Loi sur les Indiens)*	Source of funds Source des fonds Capital <input type="radio"/> Revenue <input type="radio"/>	Expenditure - Dépenses	Authority (Indian Act Section) Autorité (Article de la Loi sur les Indiens)*	Source of funds Source des fonds Capital <input type="radio"/> Revenue <input type="radio"/>
Recommending officer - Recommande par Signature _____ Date _____			Recommending officer - Recommande par Signature _____ Date _____		
Approving officer - Approuve par Signature _____ Date _____			Approving officer - Approuve par Signature _____ Date _____		

Chippewas of the Thames First Nation Community Expansion Detailed Map



<p>Scale 1:15,000</p> <p>Drawing Number 1 of 1</p>		<p>Municipality: COTTEN</p> <p>Drawn Date: 2018/02/22</p>	<p>District: London</p> <p>Drawn By: M. Robson</p>
<p>Legend</p> <p>Orange line: Proposed Main</p> <p>Purple line: Existing Main</p>			
<p>This is a general area of proposed natural gas expansion. Project details and endpoints may be adjusted during construction.</p>			

Filed: 2019-04-24

EB-2019-0139

Schedule 4

This document is to be used for viewing purposes only. It shall not guarantee gas supply or availability for a specific project. It is for demonstration purposes only indicating natural gas infrastructure.

TOTAL ESTIMATED CAPITAL COSTS – YEAR 1

CHIPPEWAS OF THE THAMES FIRST NATION PROJECT

Total Materials	\$39,553	\$39,553
Total Contract Cost	\$1,071,935	\$1,071,935
Total Company Costs	\$84,000	\$84,000
Miscellaneous (XRay, Construction Survey, Lands)	\$356,595	\$356,595
Station Labour and Materials	\$0	
Contingency	\$155,208	\$155,208
Interest During Construction	\$0	
Service Costs	\$81,519	\$81,519
Total Estimated Capital Costs		\$1,788,809

Chippewas of the Thames First Nation

10 Year Cost

Proposed Capital (\$000's)

Pipeline & Station Capital

Service, M&R Installation

Total

Year	1	2	3	4	5	6	7	8	9	10
Total										
	1,708									
	81	53	3	3	3	3	3	3	3	0
	1,863	1,789	53	3	3	3	3	3	3	0

Grant Funding

Net Capital Required

1,430
433

Project NPV

<u>Profitability Index</u>										
By Year PI	0.02	0.07	0.13	0.19	0.24	0.29	0.34	0.38	0.43	0.47
Project PI	<div><div>1.00</div></div>									

By Year PI	Project PI
2010	2010
2011	2011
2012	2012
2013	2013
2014	2014
2015	2015
2016	2016
2017	2017
2018	2018
2019	2019
2020	2020
2021	2021
2022	2022
2023	2023
2024	2024
2025	2025
2026	2026
2027	2027
2028	2028
2029	2029
2030	2030

[illegible]

Chippewas of the Thames First Nation (Project Specific DCF Analysis) Stage 1 DCF - Listing of Key Input Parameters, Values and Assumptions (\$000'S)	
Discounting Assumptions Project Time Horizon Discount Rate	40 years commencing at facilities in-service date of 01 Nov 19 Incremental after-tax weighted average After Tax Cost of Capital of 5.02%
Key DCF Input Parameters, Values and Assumptions Net Cash Inflow: Incremental Revenue: Incremental Distribution Revenues Operating and Maintenance Expense Incremental Tax Expenses: Municipal Tax Income Tax Rate CCA Rates: <div> CCA Classes: <div> CCA Class CCA Rate </div> <div> Distribution System 51 6% </div> <div> Dist'n Mains (Plastic) 51 6% </div> <div> Customer Services & MRI 51 6% </div> </div>	Approved per EB-2017-0087 Effective January 1, 2018 Estimated incremental cost Estimated incremental cost 26.50% Declining balance rates by CCA class:
Cash Outflow: Incremental Capital Costs Attributed Change in Working Capital	Refer to Schedule 5b 5.051% applied to O&M

CHIPPEWAS OF THE THAMES DESIGN AND PIPE SPECIFICATIONS
POLYETHYLENE PIPING

Polyethylene Pipe Design Specifications

Design Factor	-	0.40
Maximum Operating Pressure	-	550 kPa
Test Medium	-	Air or Nitrogen
Minimum Test Pressure	-	770 kPa
Minimum Depth of Cover (General)	-	0.6 m
Minimum Depth of Cover (Road Crossings)	-	0.6 m
Minimum Depth of Cover (Water Crossings)	-	1.2 m

Polyethylene Pipe Specifications

Size	- NPS 4
Outside Diameter	- 114.3 mm
SDR	- 11
Minimum Grade	- PE2406
Description	- C.S.A. B137.4-17
Size	- NPS 2
Outside Diameter	- 60.3 mm
SDR	- 11
Minimum Grade	- PE2406
Description	- C.S.A. B137.4-17

GENERAL TECHNIQUES AND METHODS OF CONSTRUCTION

1. Enbridge Gas Inc. (“Enbridge Gas”) will provide its own inspection staff to enforce Union’s construction specifications and *Ontario Regulation 210/01 under the Technical Standards and Safety Act 2000, Oil and Gas Pipeline Systems*.
2. Pipeline construction is divided into several crews that create a mobile assembly line. Each crew performs a different function, with a finished product left behind when the last crew has completed its work.
3. Enbridge Gas’s contract specifications require the contractor to erect safety barricades, fences, signs or flashers, or to use flag persons as may be appropriate, around any excavation across or along a road. *Ontario Traffic Manual – Book 7 – Temporary Conditions* is followed as a minimum requirement for the purpose of traffic control.
4. It is Enbridge Gas’s policy to restore the areas affected by the construction of the pipeline to “as close to original condition” as possible. When the clean-up is completed, the approval of the landowner or appropriate government authority is obtained.
5. Construction of the pipeline includes the following activities:

Locating Running Line

6. Enbridge Gas establishes the location where the pipeline is to be installed (“the running line”). For pipelines within road allowances, the adjacent property lines are identified and the running line is set at a specified distance from the property line.

Stringing

7. The pipe is strung adjacent to the running line. The sections of pipe are laid end-to-end on supports/skids that keep the pipe off the ground to prevent damage to the pipe or pipe coating.

Welding or Plastic Fusion

8. The pipe is welded/fused into manageable lengths. The welds in steel pipe are radiographically inspected, if required, and the welds are coated.

Burying

9. Pipe may be buried using either the trench method or the trenchless method. All utilities that will be crossed or paralleled by the pipeline are located by the appropriate utility prior to installing the pipeline. Prior to trenching, all such utilities will be hand-located or hydro vacuumed.

Trench Method: Trenching is done by using a trenching machine or hoe excavator depending upon the ground conditions. Provisions are made to allow residents access to their property, as required. All drainage tiles that are cut during the trench excavation are flagged to signify that a repair is required. Next, the pipe is lowered into the trench. For steel pipe, the pipe coating is tested using a high voltage electrical tester as the pipe is lowered into the trench. All defects in the coating are repaired before the pipe is lowered in. Next, if the soil that was excavated from the trench is suitable for backfill, it is backfilled. If the soil is not suitable for backfill (such as rock), it is hauled away and the trench is backfilled with suitable material such as sand. After the trench is backfilled, drainage tile is repaired.

Trenchless Method: Trenchless methods are alternate methods used where fewer trenches or no continuous trenches are required to be dug. Some examples of where these methods would be used are installation of pipelines under railways, roads, sidewalks, trees and lawns. The type of trenchless method that could be used for the proposed pipeline depends on the soil conditions, the length, and the size of the installation. The most common methods are boring (auguring), directional drilling and ploughing.

Tie-Ins

10. The sections of pipelines that have been buried using either the trench or trenchless method are joined together (tied-in).

Cleaning and Testing

11. To complete the construction, the pipeline is cleaned and tested in accordance with Union's specifications.

Restoration

12. The final activity is the restoration. The work area is leveled, the sod is replaced in lawn areas and other grassed areas are re-seeded. Where required, concrete, asphalt and gravel are replaced to return the areas to as close to the original conditions as possible.

CHIPPEWAS OF THE THAMES FIRST NATION

Pipeline Construction Schedule

Task Name	2018												2019											
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Environmental Assessments																								
Permits & Approvals																								
Engineering																								
Pre-Construction Survey																								
Material Acquisition																								
File Application																								
OEB Approval																								
Construction Survey																								
Construction and Testing																								
In-Service																								
Clean-Up																								

CHIPPEWAS OF THE THAMES FIRST NATION NATURAL GAS PIPELINE PROJECT

ENVIRONMENTAL PROTECTION PLAN

**Prepared By: Union Gas Limited
Environmental Planning
March 2018**

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Appendix B	Table 1: Pipeline Construction Mitigation Summary
Appendix C	Generic Sediment Control Plan - Horizontal Directional Drill
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1.0 INTRODUCTION

Union Gas Limited (Union) has been bringing clean, reliable, and affordable natural gas service for more than a century to over 400 communities across Ontario and as part of its Community Expansion Program, is proposing to bring natural gas service to the residents and businesses of Chippewas of the Thames First Nation.

The project will consist of approximately 6 km of small diameter (i.e. 2" – 4") polyethylene distribution pipelines to service the community. The proposed pipeline will connect to Union's existing pipeline on Chippewa Road in Chippewas of the Thames First Nation and will run east to service residents and businesses on Chippewa Road, Lower Chippewa Road, Middlemiss Drive, and Muncey Road. Please see Appendix A for project mapping.

This Environmental Protection Plan (EPP) has been prepared to document a plan for the protection of the environment during construction of the natural gas pipeline system by Union to provide natural gas service to Chippewas of the Thames First Nation.

Specifically this report will:

- Describe the proposed work necessary for the project;
- Describe the procedures that will be followed during construction of the facilities;
- Identify potential environmental impacts and recommend measures to minimize those impacts; and
- Describe public consultation opportunities.

This report will also be included with Union's evidence filed with the Ontario Energy Board (OEB).

2.0 PROJECT BACKGROUND

Chippewas of the Thames First Nation is an Indigenous community located along the Thames River approximately 20 km southwest of London. Chippewas of the Thames First Nation's total registered population as of 2013 was 2420 with 896 people living on-Reserve.

Union and Chippewas of the Thames First Nation have been looking to bring natural gas to the community many years and provided natural gas service to a portion of the community on Chippewa Road in 2013. Union and the First Nation are looking again to bring natural gas to more areas of the community and are committed to working together to protect the environment throughout all stages of the project.

Union is committed to working with Chippewas of the Thames First Nation, the Municipality of Strathroy-Caradoc, Middlesex County, Ministry of Natural Resources and Forestry (MNRF), Ministry of Tourism, Culture and Sport (MTCS), and any other party that may have an interest in the project in order to ensure environmental protection and to secure all necessary permits and approvals.

3.0 PLANNING PROCESS

3.1 Key Activities

The following is a summary of the key activities for the development of the Chippewas of the Thames First Nation Natural Gas Pipeline Project:

Project Initiation	Summer 2017
Finalize Environmental Protection Plan	March 2018
Construction	Spring 2019
Pipeline In Service	Summer 2019
Post Construction Monitoring	Spring 2020/Fall 2020

An Archaeological Assessment and a Heritage Assessment will be completed prior to construction in accordance with the MTCS guidelines and a review for environmental constraints (i.e. sensitive features and species at risk) will also be completed prior to construction.

4.0 CONSULTATION

Union has been in discussions with Chippewas of the Thames First Nation, the Municipality of Strathroy – Caradoc, and Middlesex County about the project and will continue to work with them and any other interested party in order to ensure all issues or concerns are addressed.

Union's construction group has discussed the proposal with the local road authorities to ensure that any issues or concerns are addressed. To date, no concerns have been raised.

Union completed a project summary for the Ministry of Energy (MOE) and received a list of Indigenous communities to consult with for the project. Union has begun discussing the project with the Indigenous communities identified by the MOE and will invite them to participate in the process where there are opportunities (i.e. archaeological assessments).

Union submitted an application for the natural gas grant program ("NGGP") funding to the Government of Ontario in July 2017 and informed Chippewas of the Thames First Nation of their proposal during a leadership meeting on July 19th, 2017. In December 2017, Union received notification from the government that the project had been selected for funding from the program conditional on receiving OEB approval. Once OEB approval has been received, Union or its Agent will contact all groups who will be directly affected by pipeline construction. If landowners have site specific concerns, Union or its Agent will meet with them to discuss details relating to construction. A Union representative or its Agent will be on site at all times during construction to deal with any questions that may arise.

5.0 ROUTE SELECTION

In determining the route for the pipeline in the community, Union looked at the route that offered the most natural gas connections. There are many residences on Chippewa Road, Lower Chippewa Road, and Middlemiss Drive, as well as a Senior's Residence on Muncey Road near Middlemiss Drive, therefore the proposed route was chosen accordingly. The pipeline route is also proposed to be located entirely within the road/utility right-of-way which greatly minimizes potential environmental impacts.

Please see Appendix A for the preferred running line and Appendix D identifying a number of photos along the proposed running line.

6.0 CONSTRUCTION, OPERATION AND MAINTENANCE

6.1 General Construction Practices

Clearing and Grading

This prepares the right-of-way to allow the construction of the pipeline. If required, brush, trees and grass are cut or removed and the ground levelled.

Stringing

The pipe is strung next to the proposed pipeline location. Pipe sections are laid end to end and set on supports to keep the pipe off the ground and prevent damage. Where pipeline stringing is not required, the pipeline will be installed off spools.

Trenching

To install the pipeline a trench will be dug. Trenching is done by using a trenching machine or hoe excavator depending upon the ground conditions. The width of the trench is approximately 0.5 m and the depth will be a minimum of 0.6 m.

The excavator or trenching machine will dig the trench and place the spoil in a pile beside the trench. Once the trench is excavated, the pipeline will be installed and if the spoil is suitable, it will be placed back in the trench. Any unsuitable spoil will be removed from the site and disposed of in an appropriate manner. Suitable material, such as sand, will be used to backfill the trench in locations with unsuitable spoil.

Trenchless Installations

Trenchless installation of the pipeline may be used to install sections of the line in environmentally or culturally sensitive areas (watercourses, woodlots or cultural heritage sites), road crossings, rail crossings and for portions of the distribution network within the community.

The trenchless installations will be completed using horizontal directional drilling (HDD), boring, or ploughing.

Road Crossings

It is proposed that all paved road crossings will be drilled. Road crossings will also be completed using HDD or boring. In the event that it is not possible to drill the crossings, they will be open cut after discussions with the local roads authority. The public will be notified of any road closures. Union or its Agent will attempt to maintain one lane of traffic at all times.

Cleaning and Testing

To complete construction, the pipeline is cleaned and pressure tested in accordance with CSA Z662-15.

Restoration

It is Union's policy to restore the affected areas to "as close to original" condition as practicable. To ensure the quality of the restoration, pictures of the construction area will be taken before the work commences.

6.2 Operation and Maintenance Practices

Like any system, once the pipeline system is installed it has to be maintained and serviced on a regular basis. The following paragraphs will describe the most common work to be performed by Union personnel after the gas main has been installed.

Locates

Union provides a free locate service to any person or business who may be working near a pipeline. The pipeline locator is comprised of two parts: a transmitter and a receiver. To perform a locate, the transmitter is connected to the gas facility. The transmitter sends a small current through the facility, which is picked up by the receiver. The location of the pipeline is then marked using stakes or yellow paint. No excavation is required.

Leak Surveys

To ensure that there are no leaks in the system, a company representative or Agent will "leak survey" the pipeline. The leak surveyor will walk along the gas main and carry a small machine that can detect natural gas. No excavation is required to complete the leak survey. However, if leaks are detected, excavations will be required to repair the pipeline.

7.0 POTENTIAL IMPACTS AND MITIGATION

7.1 General Environmental Features

Union has retained Stantec Consulting Ltd. (Stantec) to review the proposed running line for environmental constraints and sensitive features. Union will work with Stantec to develop mitigation measures to minimize negative impacts to any features identified.

Watercourse Crossings

It will be necessary to cross a number of watercourses as part of the project.

Watercourses will be crossed using the HDD drilling method and will be completed as per the Union Gas Limited and Fisheries and Oceans Canada – Ontario Great Lakes Area Agreement (DFO-OGLA/UGL AGREEMENT 2008). The crossings plans for HDD can be found in Appendix C.

Watercourses may be crossed above existing culverts where depth of cover is adequate and it is more practical than crossing via HDD. Silt fence will be installed along the work area limits at such crossing locations to prevent sediment from entering the watercourse. The silt fence will remain installed until the area has been completely re-vegetated.

There are no in-stream timing windows associated with HDD crossings and as according to the Agreement, there are no concerns with species at risk when watercourses are installed using the HDD method. There are also no in-stream timing windows and species at risk concerns when crossing above existing culverts as there will be no in-stream activity.

Union will adhere to the DFO-OGLA/UGL AGREEMENT 2008 and will acquire any necessary watercourse crossing approvals and permits from Chippewas of the Thames First Nation and MNRF. Through adherence to the Agreement, approval/permit conditions, and Union's standard mitigation measures for watercourse crossings, Union does not anticipate any impacts to watercourses.

Tree Clearing

Tree clearing for this project is expected to be minimal.

Union will obtain all necessary approvals for tree clearing prior to construction. Tree clearing will be restricted from occurring between April 10th to August 9th in accordance with the general nesting periods of migratory birds provided by Environment and Climate Change Canada, and will adhere to the Migratory Bird Convention Act and Migratory Bird Regulations to avoid bird nests and eggs. If project scheduling requires the removal of trees or shrubs during the nesting

period, a qualified ornithologist will be required to assess the area of removal for evidence of nesting activity prior to removal to avoid any potential loss of active nests.

Cultural Heritage Resources

Union will retain the services of a licensed archaeological consultant to initiate an Archaeological Assessment. The survey will take place prior to construction in accordance with the MTCS guidelines to identify known or potential archaeological planning constraints within the project area. The survey will serve to confirm the presence of significant archaeological resources subject to potential impacts from the proposed project activities.

If deeply buried cultural remains are encountered during construction, all activities will be suspended and the archaeological consultant as well as the MTCS will be contacted to determine the appropriated course of action.

Union will retain a Heritage Specialist from an independent third party consultant to review the running line for potential cultural heritage landscapes and built heritage resources. Union will follow the recommendations of the Heritage Specialist.

As construction is proposed to remain entirely within the disturbed portion of the road allowance, it is anticipated there will be no impacts to archaeological resources, built heritage resources or cultural heritage landscapes.

Water Wells

A hydrogeologist will review the area before construction. Based on this pre-construction assessment, a water well monitoring program will be implemented in areas where the hydrogeologist believes that pipeline construction may affect water wells. The hydrogeologist will also be available during construction in the event that there are complaints regarding water wells.

Species at Risk

Union has retained Stantec to review the running line for potential species at risk and determine if any species will be impacted by construction activities. If species at risk are identified, Union

will work with Stantec and the appropriate governing agency to develop an appropriate mitigation plan.

Mitigation could include avoiding certain areas at sensitive times, directional drilling sensitive areas, or any measure that helps reduce potential impacts. Impacts to sensitive species are anticipated to be minor in nature as the pipeline will be located within the disturbed portion of the road allowance and many features will be directionally drilled.

7.2 Mitigation Summary

Table 1 located in Appendix B provides a general summary of the potential impacts, as well as the proposed mitigation measures that will be implemented during construction to minimize impacts on the environment. These measures will be implemented as well as the specific measures identified in section 7.1.

8.0 CUMULATIVE IMPACTS

The following section considers the cumulative effects of construction on the lands due to the project. The definition of cumulative effects used in this report is: “changes to the environment that are likely to result from a particular project in combination with other projects or activities that have been or will be carried out”.

There may be cumulative impacts between this pipeline and other projects in the area, although at this time Union is unaware of any projects that would interact with this proposal.

Additional noise, dust and traffic could be an issue should construction occur concurrently however, the benefits of having these facilities will, in the long term, be a positive impact. It is not expected that any threshold or triggers will be exceeded since the construction of this pipeline is generally minor in nature and takes place in a previously disturbed area. Indirect benefits could include increased development in the area with the availability of natural gas.

Constructing natural gas pipelines within road allowances that have been previously disturbed will focus, if not entirely limit, cumulative effects to a corridor planned and designated for infrastructure projects.

9.0 SUMMARY AND RECOMMENDATIONS

This Environmental Protection Plan describes a strategy for the protection of the environment during the construction of a natural gas pipeline system in Chippewas of the Thames First Nation. The plan has been developed by noting the environmental features in the area and the potential impacts of construction. The plan recommends a number of measures to reduce the impacts of the development.

It is recommended that the pipeline be monitored the year after construction to ensure that restoration measures were effective. If additional restoration measures are required, they should be completed as soon as possible. It is also recommended that residents have access to Union Gas or its Agent in order to address any concerns that may arise during construction.

With the implementation of the recommended mitigation measures, and ongoing landowner and agency communication, the Chippewas of the Thames First Nation Natural Gas Pipeline Project is not anticipated to have any significant adverse environmental or socio-economic effects.

APPENDIX A PROJECT LOCATION MAP

APPENDIX B
TABLE 1: PIPELINE MITIGATION
SUMMARY

TABLE 1: PIPELINE CONSTRUCTION MITIGATION SUMMARY

Issue	Potential Impact	Proposed Mitigation
Paved Driveways and Roadways	Disruption to local traffic, landowners and tenants	<ul style="list-style-type: none"> • All paved roadways and driveways to be bored if practical. • If boring is not possible, steel plates will be on site to provide access to landowners and tenants. • Driveways will be repaired as soon as possible. • For driveways that require cutting, the excavation is to be filled with sand and granular material and compacted.
Gravel Driveways and Roadways	Disruption to landowners and tenants	<ul style="list-style-type: none"> • Roadways and driveways will be open cut. • Steel plates will be kept on site to provide access to landowners and tenants. • Driveways will be repaired as soon as possible.
Traffic	Disruption to local citizens	<ul style="list-style-type: none"> • The Company will keep one lane of traffic open and will implement traffic controls as required. • Flag persons and warning devices will be used to notify traffic of the construction zone in accordance with Ministry of Transportation standards.
Public Safety	Public safety concerns	<ul style="list-style-type: none"> • Company inspectors will ensure public safety on construction site. • Ensure proper signage and flag persons if required.
Commercial/Retail Businesses and Recreational Areas	Disruption to businesses	<ul style="list-style-type: none"> • Ensure access at all times. • Restore area as soon as possible after construction. • Schedule construction with owners or managers, where necessary.
Construction Noise	Disturbance to landowners and tenants	<ul style="list-style-type: none"> • Construction to be carried out during daylight hours whenever possible. • Ensure equipment is properly muffled.
Nuisance Dust	Disruption to landowners and tenants.	<ul style="list-style-type: none"> • Control dust as required.
Construction Equipment	Disruption to landowners and tenants	<ul style="list-style-type: none"> • Equipment will be stored off road shoulders when not in use.
Landowner Concerns	Disruption to landowners and tenants	<ul style="list-style-type: none"> • The Company to provide landowners and tenants with the

TABLE 1: PIPELINE CONSTRUCTION MITIGATION SUMMARY		
Issue	Potential Impact	Proposed Mitigation
		telephone numbers of supervisory personnel.
Fences	<p>Disruption to landowners and tenants.</p> <p>Loss of control of animals inside fenced areas.</p>	<ul style="list-style-type: none"> Landowners and tenants will be contacted before any fences are disturbed. Temporary fencing will be erected if requested by landowner or tenant. Fences will be replaced as soon as possible.
Front Yards	Disruption to landowners and tenants.	<ul style="list-style-type: none"> Landowners and tenants will be notified prior to construction. Restore lawns and yards to original condition
Mailboxes	Disruption to landowners	<ul style="list-style-type: none"> Notify landowners prior to construction. Restore as soon as possible. Provide temporary alternative if necessary.
Underground Utilities	Disruption of services	<ul style="list-style-type: none"> Obtain "locates" from all utilities. If utilities are damaged, repair as soon as possible.
Archaeology	Disturbance of heritage resources	<ul style="list-style-type: none"> An archaeological assessment will be completed prior to construction Stop construction if artifacts are encountered. Notify Ontario Ministry of Tourism, Culture and Sport.
Water Wells	Disruption to water supply	<ul style="list-style-type: none"> If water quality/quantity problems occur as a result of construction activities, the Company will supply potable water until the situation has been corrected. Conduct hydrogeology investigation and monitor wells as required.
Trees	<p>Damage to Trees</p> <p>Disturbance to wildlife</p>	<ul style="list-style-type: none"> No tree removal is anticipated. If tree removal is necessary, alter alignment to avoid trees if possible. Pipeline to be located one metre from base of tree if possible. Trees to be removed outside of avian nesting window if required. Discuss restoration plans with landowner.
Watercourse Crossings	Water quality concerns	<ul style="list-style-type: none"> Union will comply with all permit conditions.

TABLE 1: PIPELINE CONSTRUCTION MITIGATION SUMMARY		
Issue	Potential Impact	Proposed Mitigation
		<ul style="list-style-type: none"> • Union will adhere to all Company specifications and Department of Fisheries and Oceans-endorsed Generic Sediment Control plans for watercourse crossings.
Natural Areas	Sedimentation run-off	<ul style="list-style-type: none"> • Ensure sediment barriers such as straw bales/sediment fencing are used where there is a potential for run-off.
Vegetative Cover	Loss of vegetative cover leading to soil erosion	<ul style="list-style-type: none"> • Restore cover by means of seeding or hydro-seeding as soon as possible.
Soils: Erosion	Introduction of sediment/ silt to adjacent lands	<ul style="list-style-type: none"> • Restore disturbed soils as soon as possible after construction.
Road Side Ditches	Water quality concerns	<ul style="list-style-type: none"> • Ensure ditches are returned to pre-construction condition as quickly as possible. • Install rock rip rap/straw bale check dams as required.
Spills	Public safety issue	<ul style="list-style-type: none"> • Ensure the Ministry of Environment and Climate Change is notified, as per spill procedure. • Clean up spilled material.
Contaminated Soils	Dealing with contaminated materials Public safety issue	<ul style="list-style-type: none"> • No sites are anticipated as a result of this proposal however should suspect soils be uncovered, work should stop immediately and the Union Gas Environmental Department contacted. • Clean up contaminated material following Company and MOECC procedures.
Cemeteries	Disturbance to unmarked grave sites and disruptive to services.	<ul style="list-style-type: none"> • Confirm location of all cemeteries with Chippewas of the Thames First Nation. • Stop construction if suspect material encountered and immediately notify the Environmental Planner. • Suspend construction near cemeteries during services.
Site Restoration	Disturbance to public and private properties	<ul style="list-style-type: none"> • Construction area to be restored as soon as possible upon completion of pipe installation.

APPENDIX C
GENERIC SEDIMENT CONTROL PLAN –
HORIZONTAL DIRECTION DRILL

Generic Sediment Control Plan – Horizontal Directional Drill

Fisheries and Oceans Canada (DFO) is responsible for protecting fish and fish habitat across Canada. Under the Fisheries Act no one may carry out a work or undertaking that will cause the harmful alteration, disruption or destruction (HADD) of fish habitat unless it has been authorized by the DFO. By following the conditions and measures set out in the Stream Crossing Review and this Drawing, you will be in compliance with subsection 35(1) of the Fisheries Act. This plan sets out the measures that will be taken by Union Gas Limited (company) and its contractors in order to avoid negative impacts to fish habitat during horizontal directional drill crossings. The conditions and techniques set out on this plan are to be followed unless approved otherwise by the DFO.

Measures to Protect Fish and Fish Habitat when Horizontal Directional Drilling

- The company must use materials, construction practices, mitigation techniques and monitoring of operations of every water crossing in order to prevent or unauthorized HADD or the impairment of water quality. The following requirements apply to any permanent or intermittent waterbody (stream, river, pond) and areas adjacent to it.
- Design the drill path to an appropriate depth below the watercourse to minimize the risk of frac-out and to a depth to prevent the line from becoming exposed due to natural scouring of the stream bed. Ensure the drill entry and exit points are far enough from the banks of the water course to have minimal impact on these areas.
- The company will adhere to all permits and approvals of federal and provincial agencies related to watercourse crossings.
- The company will notify the appropriate federal or provincial agencies related to watercourse crossings.
- Use existing trails, roads or cut lines wherever possible, as access routes to avoid disturbance to the riparian vegetation.
- Sediment fences must be installed between the work site and the watercourse. Ensure all fencing is properly keyed into the ground.
- Prior to removal of the low vegetative cover, effective mitigation techniques for erosion and sediment control must be in place to protect water quality. Limit the areal extent of disturbance to the minimum and within the road or utility right-of-way. Delay grubbing to immediately prior to the crossing operation.
- Materials removed or stockpiled during construction must be deposited in a manner to ensure sediment does not enter into a waterbody. This material must be protected with appropriate erosion and sediment controls devices (sediment fencing, strawbales).
- All vehicles, machinery and other construction equipment shall not enter the water. There must be no loading of any waterbody. The company is to adhere to the Generic Sediment Control Plan for Temporary Vehicle Crossings. This plan is endorsed by the DFO.
- Refueling and lubrication of equipment will be conducted in areas that will allow any accidental spill of deleterious substance to be disposed of in an approved location before it reaches any waterbody. Appropriate spill prevention kits shall be readily available on site.
- Monitor the watercourse to observe signs of surface migration (frac-out) or drilling mud during all phases of construction.
- There are no in-stream timing restrictions on this work.
- The company will be held responsible for implementation of this plan.

Crossing Procedures

- Sediment fences are to be established between the entry and exit points and the watercourse (potential for sediment to enter watercourse).
- At a minimum the entry and exit points must be located as identified on this plan.
- Mud sump pits are to be excavated at the entry and exit points of the drill to contain drilling fluids to prevent sediment and other deleterious substances from entering the watercourse. If this cannot be achieved, use silt fences or other effective sediment and erosion control measures to prevent drilling mud from entering the watercourse. These pits must be excavated prior to back reaming.
- All drilling fluids are to be contained during the entire drilling process and promptly removed as sump pits are filled and/or when the drill is completed.
- All excess material is to be removed from the construction site to an approved location.
- Monitoring of the watercourse must be completed during all phases of the crossing attempt.

Emergency Frac-out Response and Contingency Planning

- Keep all material and equipment needed to contain and clean up drilling mud releases on site and readily accessible in the event of a frac-out.
- The drilling procedure will be closely monitored throughout the crossing attempt to limit the extent of a "fracture" (frac out).
- If the pilot drill results in a "fracture" (drill fluids enter the stream bed or stream banks), drilling should be stopped immediately and the procedures outlined in the Environmental Compliance section should be followed.
- Measures must be taken to contain the drilling mud and prevent its further migration into the watercourse. Measures to control fracturing will include, stopping the drill, the use of vacuum trucks, excavation of relief pits (dry land) and any other measure deemed appropriate by the company.
- Prioritize cleanup activities relative to the risk of potential harm and dispose of the drilling mud in a manner that prevents re-entry into the watercourse.
- Ensure clean up measures do not result in greater damage to the banks and watercourse than from leaving the drilling mud in place.
- Once the site has been deemed secure and the risk of drilling mud entering the watercourse has been addressed, the drill shall be pulled back and can be restarted with a new deeper attempt and/or a change to the existing running line, to attempt to avoid the fracturing problem.
- If subsequent drill attempts result in additional fracturing, then the crossing shall be halted and the Environmental Planning group should be contacted. Additional permits or authorizations to continue the drill using in-stream mitigation or to change the crossing technique, may be required.
- In the event that the horizontal directional drill cannot be completed a dam and pump or flumed crossing technique will be implemented following the specific Generic Sediment Control Plan endorsed by DFO under the DFO-DOLA AGREEMENT 2000.

Environmental Compliance

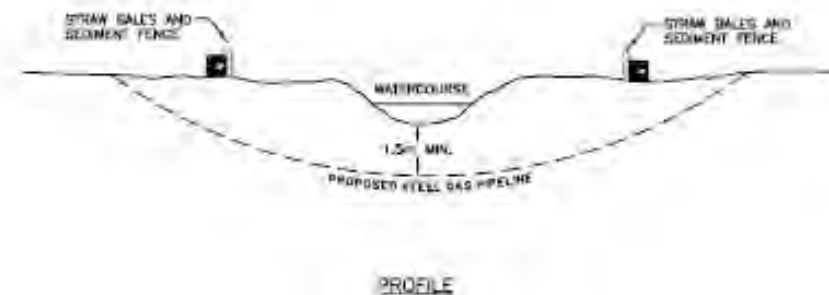
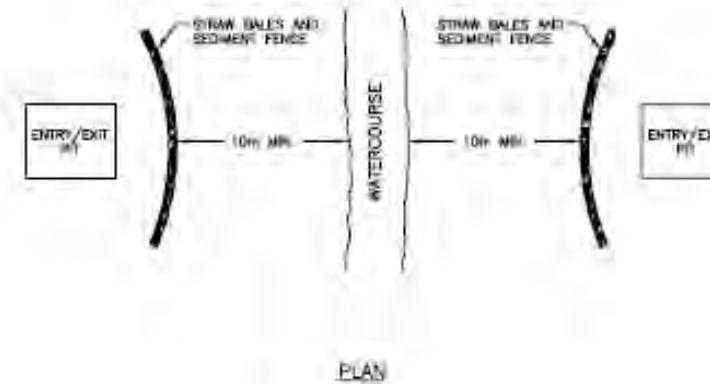
Contractor

- In the event that drilling fluids enter the watercourse or turbidity is generated by air migration, the Ministry of the Environment (MOE) shall be contacted by the contractor in compliance with their spill policy.
- Such an incident is to be phoned into the MOE Spills Action Centre at 1-800-265-6080 by the contractor. The Spills Action Centre will require the following information:
 - The nature of the incident (what happened and what materials were involved).
 - Approximate volume of material involved.
 - The incident location (lot, concession, township, county and/or city).
 - Actions that have or will be taken.
 - The name and telephone number of the person calling.
 - The incident should be monitored.
 - The date, time and duration of the event should be recorded, as well as the content of the call to the MOE Spills Action Centre.

Company

- In the event that drilling fluids enter the watercourse or turbidity is generated by air migration, the Department of Fisheries and Oceans or local Conservation Authority (CA) shall be contacted by the Company Inspector. DFO contact information is provided on the Stream Crossing Review and CA contact information can be found on the permit.
- When this has been completed, Union's Environmental Planning Department or Lands Department staff shall also be notified.
- All calls identified above are mandatory and are to be completed immediately after the incident has occurred.

Minimum Horizontal Directional Drill Setback and Depth:



NOTES:

- STRAW BALES AND SEDIMENT FENCE TO BE SET UP A MINIMUM OF 10m FROM WATERCOURSE.
- HORIZONTAL DIRECTIONAL DRILL TO BE SET UP BEHIND STRAW BALES AND SEDIMENT FENCE.
- MINIMUM OF 1.5m COVER FROM TOP OF PIPE TO BED OF WATERCOURSE.
- ALL DISTURBED AREAS TO BE RESTORED TO PRE-CONSTRUCTION CONDITIONS OR AS CLOSE AS POSSIBLE.

Restoration

The following conditions should be adhered to for the restoration of the construction site and adjacent lands:

- Ensure the entry and exit pits are cleaned of drilling fluids and the fluids are disposed of in an approved location.
- Any disturbed areas adjacent to the watercourse will be seeded, covered with erosion control matting or equivalent and restored as close as possible to preconstruction conditions.
- Vegetation on watercourse banks will either remain in place or will be replaced following construction.
- All seeding and vegetation replacement will be with native species to Ontario.
- If post construction monitoring reveals erosion problems, remedial work will be undertaken as quickly as possible.
- All debris/garbage shall be removed from construction site to an approved location.
- If there is insufficient time remaining in the growing season, the site should be stabilized (e.g., cover exposed areas with erosion control blankets to keep the soil in place and prevent erosion) and vegetated the following spring.
- Maintain effective sediment and erosion control measures until revegetation of disturbed areas is achieved.

Contingency Plan

If, for any reason, the attempt to cross this watercourse by means outlined above is not successful, the Environmental Planner will be contacted to discuss an alternative crossing method. It should be noted that under no circumstances shall an alternative crossing method be attempted for any crossing without prior notification. Any changes to this Stream Crossing Review may require permit amendments or governmental agency approval.

If unforeseen events cause the strategies set out in this plan to be insufficient or inappropriate to meet the objective, the company is expected to respond in a safe and timely manner with all reasonable measures to prevent, counteract or remedy any effects on fish or fish habitat that may result. DFO or CA is to be notified as soon as practical.

Spill reporting procedures established by MOE shall be used to report any unexpected discharge of silt or sediment or other deleterious substance at the water crossing. The spill/incident shall also be reported to the DFO or CA as soon as possible in these circumstances.

If DFO determines that long term damage to fish habitat has occurred due to failure of this plan to control sediment, a restoration plan will be developed by the company, in consultation with and approval from DFO for implementation by the company.

NOTES

Union Gas is responsible for implementation of appropriate sediment and erosion control to mitigate impacts to fish and fish habitat.

DATE	REV	REVISION	BY	APP
------	-----	----------	----	-----



PROJECT
UNION GAS LIMITED
CONSTRUCTION PROGRAM

LOCATION
ALL HORIZONTAL DIRECTIONAL DRILL
CROSSINGS IN ONTARIO

DRAWING TITLE
GENERIC SEDIMENT CONTROL PLAN
HORIZONTAL DIRECTIONAL DRILL

SCALE	NTS	DATE	MAY 16/12
FILE NO.		PROJECT NO.	
DRAWN	GTH	CHECKED	
		DRAWING	REV
		NO. OF	0
APPROVED			

APPENDIX D PHOTOGRAPHS



1. Proposed connection location to Union's existing pipeline on Chippewa Road (looking east in front of the Chippewas of the Thames Band Office)



2. Typical view along Chippewa Road (looking east)



3. View of Middlemiss Drive just east of Chippewa Road (looking east)



4. View of Lower Chippewa Road (looking east from Chippewa Road)



5. View of Lower Chippewa Road (looking north towards Middlemiss Drive)



6. View of Muncey Road (looking south from Middlemiss Drive)

OPCC Review Summary

Chippewas of the Thames First Nation Project

In March 2018, Union Gas Limited (Union) completed an Environmental Protection Plan (EPP) for the Chippewas of the Thames First Nation Project (the Project). The EPP was emailed to the Ontario Pipeline Coordinating Committee (OPCC), Indigenous Communities, and local Agencies as part of the OPCC review process on April 17th, 2018. OPCC comments on the EPP were requested to be directed to Zora Crnojacki of the Ontario Energy Board and Evan Tomek of Union by May 31st, 2018.

OPCC comments were only received from the Ministry of Tourism, Culture and Sport, Ministry of Transportation, Infrastructure Ontario, and the Technical Standards and Safety Authority. Comments were also received from the County of Middlesex and the Lower Thames Valley Conservation Authority.

Please see the summary table of all comments received in the OPCC review as well as the complete comments on the following pages:

AGENCY	COMMENT	UNION'S RESPONSE
Ministry of Tourism, Culture and Sport	<p>1. Email dated April 19th, 2018 (via Karla Barboza)</p> <p>Confirmed receipt of the EPP.</p> <p>Requested Union Gas to update MTCS contact information to include Brooke Herczeg.</p> <p>2. Email with attached letter dated May 31st, 2018 (via Brooke Herczeg)</p> <p>Noted that Union is undertaking Cultural Heritage Studies and had previously completed Archaeological Assessments for the project.</p> <p>3. Email (response) dated April 2nd, 2019 (via Karla Barboza)</p> <p>Confirmed Katherine Kirzati would provide comments if necessary.</p>	<p>1. Emailed dated April 24th, 2018</p> <p>Acknowledged comments.</p> <p>2. Email with attached letter dated July 11th, 2018</p> <p>Clarified that the Archaeological Assessments the Ministry identified in their comments were from previous projects.</p> <p>Identified Aecom as the consultant completing the Cultural Heritage Study.</p> <p>3. Email (update) dated April 2nd, 2019</p> <p>Provided an update to the MTCS pertaining to Archaeology and Cultural Heritage and attached both reports.</p>
Middlesex County via Kathy Bunting	<p>1. Email with attached letter dated April 20th, 2018</p> <p>Require a permit for a small section of Muncey Road (County Road 11).</p> <p>No other concerns.</p>	<p>1. Email dated April 24th, 2018</p> <p>Acknowledged comments and indicated that Union Gas would obtain the necessary permit from the County prior to construction.</p>
Infrastructure Ontario via Patrick Grace (OPCC)	<p>1. Email dated May 7th, 2018</p> <p>No comments as it is located within the road/utility right-of-way.</p>	<p>1. Email dated May 7th, 2018</p> <p>Acknowledged comments.</p>
Lower Thames Valley Conservation Authority via Jason Homewood	<p>1. Email dated May 24th, 2018</p> <p>Confirmed Union has been in contact with the CA already about the project.</p>	<p>1. Email dated May 24th, 2018</p> <p>Acknowledged comments.</p>
Ministry of Transportation via Tony Di Fabio	<p>1. Email dated May 30th, 2018</p> <p>No comments.</p>	<p>1. Email dated May 30th, 2018</p> <p>Acknowledged comments.</p>
Technical Standards and	<p>1. Email dated June 26th, 2018</p>	<p>1. Email dated June 28th, 2018</p>

AGENCY	COMMENT	UNION'S RESPONSE
<p>Safety Authority via Kourosh Manouchehri</p>	<p>Requested technical information pertaining to the project.</p> <p>2. Email with attached letter dated July 10th, 2018</p> <p>Confirmed the project was in compliance to the requirements of applicable standard CSA Z662-15 and of Oil and Gas Code Adoption Document, FS-238-18.</p>	<p>Provided the requested technical information.</p>

Evan Tomek

From: Evan Tomek
Sent: April-24-18 11:38 AM
To: 'Barboza, Karla (MTCS)'
Cc: Herczeg, Brooke (MTCS); zora.crnojacki@ontarioenergyboard.ca; Shelley Bechard
Subject: RE: MTCS File 0000062 - Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Hi Karla,

Thanks again for your responses.

I have updated the contact info and will forward any notices and/or communications related to this project to you and Brooke.

Thanks,

Evan Tomek, BES

Environmental Planner on behalf of
 Union Gas Limited | An Enbridge Company
 745 Richmond Street | Chatham, ON N7M 5J5
 Tel: 519.436.2460 ext 5236904
 Cell: 226.229.9598
 email: etomek@uniongas.com



From: Barboza, Karla (MTCS) [<mailto:Karla.Barboza@ontario.ca>]
Sent: April-19-18 3:04 PM
To: Shelley Bechard; Evan Tomek
Cc: Herczeg, Brooke (MTCS); zora.crnojacki@ontarioenergyboard.ca
Subject: [External] MTCS File 0000062 - Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Hi Shelley and Evan,

Thanks for submitting the Environmental Protection Plan report for the Chippewas of the Thames First Nation Natural Gas Pipeline Project to the Ministry of Tourism, Culture and Sport (MTCS). MTCS will review the report and will provide comments, as appropriate, by May 31, 2018.

Could you please update the contact info for the ministry to include both myself and Brooke Herczeg:

- Karla Barboza | Team Lead - Heritage (Acting) | 416-314-7120 | karla.barboza@ontario.ca
- Brooke Herczeg | Heritage Planner (Acting) | 416-314-7133 | brooke.herczeg@ontario.ca

Please continue to forward any notices and/or communications related to this EA project to both myself and Brooke.

Thanks,
 Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage
Ministry of Tourism, Culture and Sport
Culture Division | Programs and Services Branch | Heritage Program Unit
T: 416-314-7120 | fax: 416-312-1802 | Email: karla.barboza@ontario.ca

From: Shelley Bechard [<mailto:sbechard@uniongas.com>]

Sent: April 17, 2018 3:56 PM

To: Hatcher, Laura (MTCS)

Cc: Crnojacki, Zora; Evan Tomek

Subject: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Good Afternoon,

An Environmental Protection Plan (EPP) for the above mentioned project is attached for your review.

Thanks.

Shelley Bechard

Administrative Analyst, Regulatory Projects

Union Gas Limited | An Enbridge Company

50 Keil Drive, Chatham, ON N7M 5M1

Tel: 519-436-4600 x5002075 | Cell: 519-365-7788

Email: sbechard@uniongas.com | uniongas.com

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Evan Tomek

From: Evan Tomek
Sent: July-11-18 8:38 PM
To: 'Herczeg, Brooke (MTCS)'
Cc: Barboza, Karla (MTCS)
Subject: RE: Chippewas of the Thames Pipeline
Attachments: UGL_COTTFN_MTCS.pdf; TMHC St. 1-2 Archaeology Proposal_UG_COTTFN Pipeline.pdf

Hi Brooke,

Thank you for your review of and comment on the Chippewas of the Thames Natural Gas Pipeline Project Environmental Protection Plan prepared by Union Gas Limited.

Please see the attached letter that intends to address your comments as well as the Stage 1 – 2 Archaeological Assessment Report completed by Timmins Martelle Heritage Consultants Inc. for the project as submitted to the MTCS in June 2018.

If you have any questions please feel free to contact me.

Thanks,

Evan Tomek, BES

Environmental Planner *on behalf of*
 Union Gas Limited | An Enbridge Company
 745 Richmond Street | Chatham, ON N7M 5J5
 Tel: 519.436.2460 ext 5236904
 Cell: 226.229.9598
 email: etomek@uniongas.com



From: Herczeg, Brooke (MTCS) [<mailto:Brooke.Herczeg@ontario.ca>]
Sent: May-31-18 10:40 AM
To: Evan Tomek
Cc: Zora.Crnojacki@ontarioenergyboard.ca; Barboza, Karla (MTCS)
Subject: [External] Chippewas of the Thames Pipeline

Dear Mr. Tomek,

Please find the attached MTCS comments for the above noted project. If you have any questions please feel free to contact me.

Thank you,
 Brooke
 Brooke Herczeg MPL

**Ministry of Tourism,
Culture and Sport**

Heritage Program Unit
Programs and Services Branch
401 Bay Street, Suite 1700
Toronto ON M7A 0A7
Tel: 416 314 7133
Fax: 416 212 1802

**Ministère du Tourisme,
de la Culture et du Sport**

Unité des programmes patrimoine
Direction des programmes et des services
401, rue Bay, Bureau 1700
Toronto ON M7A 0A7
Tél: 416 314 7133
Téléc: 416 212 1802



May 31st 2018 (EMAIL ONLY)

Evan Tomek
Environmental Planner
Union Gas Limited
P.O.Box 2001,
50 Keil Drive North, Chatham ON N7M 5M1
E: ETomek@uniongas.com

RE: MTCS file #: 0000062
Proponent: Union Gas
Subject: Notice of Completion
Chippewas of the Thames Pipeline
Location: Ekfrid and Caradoc, Middlesex, Ontario

Dear Mr. Tomek:

Thank you for providing the Ministry of Tourism, Culture and Sport (MTCS) with the Notice of Completion of the Environmental Protection Plan (EPP) for the Chippewas of the Thames First Nation Natural Gas Pipeline Project. MTCS's interest in this Environmental Assessment (EA) project relates to its mandate of conserving Ontario's cultural heritage, which includes:

- Archaeological resources, including land-based and marine;
- Built heritage resources, including bridges and monuments; and,
- Cultural heritage landscapes.

Under the EA process, the proponent is required to determine a project's potential impact on cultural heritage resources.

Project Description

Union Gas has proposed an expansion program that will bring natural gas service to the residents and businesses of Chippewas of the Thames First Nation.

MTCS has reviewed the EPP for the Chippewas of the Thames First Nations Natural Gas Pipeline Project dated March 2018 prepared by Union Gas Limited and has the following comments;

Archaeological Resources

MTCS understands that Stage 1&2 archaeological assessment (AA, under Project Information Form Number P349-094-2013, Stage 3 AA (under PIF Number P349-097-2013) and Stage 4 AA (under PIF Number P357-0031-2013) have been entered into the Ontario Public Register for Archaeological Reports. Recommendations made in archaeological assessment stages 1-4 should be followed. These recommendations should be included and described in the EPP detailing long-term protection and avoidance measures.

Section on Cultural Heritage Resources (page 10 of Pdf) of the EPP indicates that archaeological assessment(s) will be completed at such areas prior to construction in accordance with MTCS guidelines. MTCS recommends that this is clarified according to work that has already been undertaken and disclose all the recommendations.

Built Heritage and Cultural Heritage Landscapes

Section Cultural heritage Resources (page 10 of the PdF) indicates that "Union has retained a Cultural Heritage Specialist from Aecom to review the running line for potential cultural heritage landscapes and built heritage resources. Union will follow the recommendations of the Specialist". Please submit any technical cultural heritage studies for MTCS review as soon as possible. MTCS may have additional comments on this section as well as Appendix B - Table 1 (Pipeline Construction Mitigation Summary).

Appendix B (page 18 of PdF) indicates that cemeteries are located within the study area and may be impacted. MTCS recommends that cemeteries will need to be addressed also in the technical cultural heritage study (e.g. a Cultural Heritage Evaluation Report by Union Gas' heritage consultant).

Thank you for consulting MTCS on this project, if you have any questions or wish to discuss something please feel free to contact me.

Sincerely,

Brooke Herczeg
Heritage Planner
Brooke.Herczeg@Ontario.ca

Copied to: Zora Crnojacki - Coordinator Ontario Pipeline Coordination Committee Ontario Energy Board Zora.Crnojacki@ontarioenergyboard.ca

Karla Barboza - (A) Team Lead Heritage Program Unit Ministry of Tourism, Culture and Sport Karla.barboza@ontario.ca

It is the sole responsibility of proponents to ensure that any information and documentation submitted as part of their EA report or file is accurate. MTCS makes no representation or warranty as to the completeness, accuracy or quality of the any checklists, reports or supporting documentation submitted as part of the EA process, and in no way shall MTCS be liable for any harm, damages, costs, expenses, losses, claims or actions that may result if any checklists, reports or supporting documents are discovered to be inaccurate, incomplete, misleading or fraudulent.

Please notify MTCS if archaeological resources are impacted by EA project work. All activities impacting archaeological resources must cease immediately, and a licensed archaeologist is required to carry out an archaeological assessment in accordance with the Ontario Heritage Act and the Standards and Guidelines for Consultant Archaeologists.

If human remains are encountered, all activities must cease immediately and the local police as well as the Registrar, Burials of the Ministry of Government and Consumer Services (416-326-8800) must be contacted. In situations where human remains are associated with archaeological resources, MTCS should also be notified to ensure that the site is not subject to unlicensed alterations which would be a contravention of the Ontario Heritage Act.

July 11, 2018 (EMAIL ONLY)

Ms. Brooke Herczeg
Heritage Planner
Ministry of Tourism, Culture & Sport
Heritage Program Unit
Programs and Services Branch
401 Bay Street, Suite 1700
Toronto, ON M7A 0A7
Brooke.Herczeg@ontario.ca

Re: Union Gas Limited
Chippewas of the Thames First Nation Natural Gas Pipeline Project

Dear Ms. Herczeg,

Thank you for your review of the Environmental Protection Plan (EPP) for the above noted project and for providing comments in your letter dated May 31, 2018. In an effort to address your comments, I have provided responses below under the headings provided in your letter:

Archaeological Resources

The Stage 1&2 archaeological assessment (AA, under Project Information Form Number P349-094-2013), Stage 3 AA (under PIF Number P349-097-2013) and Stage 4 AA (under PIF Number P357-0031-2013) as referenced in your letter were previous AA's completed for a different Union Gas Limited (UGL) project in 2013 in Chippewas of the Thames First Nation (COTTFN) territory and are not related to the current proposed project.

UGL retained Timmins Martelle Heritage Consultants Inc. to complete a Stage 1&2 AA (under PIF Number P316-0352-2018) and the report was recently submitted to the Ministry of Tourism, Culture and Sport (MTCS) in June 2018 and is attached. UGL will adhere to the recommendations of this report subject to MTCS review and acceptance of the report into the provincial registry.

Built Heritage and Cultural Heritage Landscapes

Aecom will be completing the Cultural Heritage Study in summer/fall 2018 and will submit the technical heritage studies to the MTCS at that time.

No cemeteries have been identified within the project area and therefore impacts are not anticipated.

Thank you again for your time. If you have any questions, please contact me at 1-519-436-2460 x 5236904 or by email at ETomek@uniongas.com.

Yours very truly,



Evan Tomek
Environmental Planner
Union Gas Limited

Cc: Ms. Karla Barboza, Team Lead – Heritage (Acting), MTCS,
karla.barboza@ontario.ca

Evan Tomek

From: Barboza, Karla (MTCS) <Karla.Barboza@ontario.ca>
Sent: April-02-19 4:23 PM
To: Evan Tomek
Cc: Kirzati, Katherine (MTCS)
Subject: [External] FW: COTTEN Archaeology/Heritage Update
Attachments: RPT-UnionGasLtd-2019-04-01-COTTEN-60578917.pdf; ENTERED INTO REGISTER Archaeological Report for P316-0352-2018.pdf

Hi Evan,

Thanks for the update on this project and for sending the Cultural Heritage Overview Report. I copied Katherine Kirzati, MTCS Heritage Planner.

Katherine will review the Cultural Heritage Overview Report and provide comments, if any.

Thanks again,
 Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage
 Ministry of Tourism, Culture and Sport
 Culture Division | Programs and Services Branch | Heritage Planning Unit
 T: 416.314.7120 | Email: karla.barboza@ontario.ca

From: Evan Tomek <ETomek@uniongas.com>
Sent: April-02-19 2:26 PM
To: Barboza, Karla (MTCS) <Karla.Barboza@ontario.ca>
Subject: COTTEN Archaeology/Heritage Update

Hi Karla,

As with the North Bay project, we have also been given the go ahead to resume work on the Chippewas of the Thames First Nation project that we started last year so I wanted to give you an update.

I have attached the Cultural Heritage Overview report completed by Aecom for the project (in April 2019), as well as the Archaeological Assessment report completed by Timmins Martelle Heritage Consultants Inc, which just received approval today and is also attached.

If you have any questions, please let me know.

Thanks,

Evan Tomek, BES

Environmental Planner *on behalf of*

Enbridge Gas Inc.

745 Richmond Street | Chatham, ON N7M 5J5

Tel: 519.436.2460 ext 5236904

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Evan Tomek

From: Evan Tomek
Sent: April-24-18 11:45 AM
To: 'Kathy Bunting'
Subject: RE: Letter to Union Gas - Chippewas natural gas comments.pdf

Hi Kathy,

Thank you for your review of the Environmental Protection Plan and comments regarding the Project.

Union Gas will obtain the necessary permits and approvals from the County prior to construction.

Thanks again,

Evan Tomek, BES

Environmental Planner *on behalf of*
Union Gas Limited | An Enbridge Company
745 Richmond Street | Chatham, ON N7M 5J5
Tel: 519.436.2460 ext 5236904
Cell: 226.229.9598
email: etomek@uniongas.com



From: Kathy Bunting [<mailto:kbunting@middlesex.ca>]
Sent: April-20-18 8:23 AM
To: Evan Tomek
Subject: [External] Letter to Union Gas - Chippewas natural gas comments.pdf

Kathy Bunting
County Clerk
County of Middlesex
399 Ridout Street North
London, ON N6A 2P1 519-434-7321 ext. 2250





Office of the County Clerk
399 Ridout Street North, London, Ontario, N6A 2P1
kbunting@middlesex.ca
519-434-7321

April 20, 2018

Evan Tomek
Environmental Planner
Union Gas Limited
P.O. box 2001
50 Keil Drive North
Chatham, Ontario NN7M 5M1
etomek@uniongas.com

Re: Union Gas Limited
Chippewas of the Thames first Nation Natural Gas Pipeline Project

Dear Evan:

Further to your letter and attachments of April 17, 2018 with respect to the above mentioned, please be advised that the documents have been reviewed by our Director of Planning and our County Engineer.

Mr. Traini, our County Engineer noted that there is a small section of Muncey Road (County Road 11) where you will need a permit which is typically obtained by the agents of Union Gas. Other than that we, have no concerns with the proposal.

Yours truly,

Kathy Bunting, AMCT
County Clerk
/kb

c.c. Chris Traini, County Engineer
Durk Vanderwerff, Director of Planning

Evan Tomek

From: Evan Tomek
Sent: May-07-18 9:19 AM
To: 'Grace, Patrick (IO)'; Shelley Bechard
Cc: Crnojacki, Zora
Subject: RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Thank you for your review of and comment on the Environmental Protection Plan for this project Patrick, it is much appreciated.

Regards,

Evan Tomek, BES

Environmental Planner *on behalf of*
 Union Gas Limited | An Enbridge Company
 745 Richmond Street | Chatham, ON N7M 5J5
 Tel: 519.436.2460 ext 5236904
 Cell: 226.229.9598
 email: etomek@uniongas.com



From: Grace, Patrick (IO) [<mailto:Patrick.Grace@infrastructureontario.ca>]
Sent: May-07-18 9:07 AM
To: Shelley Bechard
Cc: Crnojacki, Zora; Evan Tomek; Grace, Patrick (IO)
Subject: [External] RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Shelley I have reviewed the Union Gas proposed Project Since the pipeline route is to be located entirely within the road / utility right of way I have no comments

Patrick Grace

From: Shelley Bechard [<mailto:sbechard@uniongas.com>]
Sent: Tuesday, April 17, 2018 3:56 PM
To: Grace, Patrick (IO) <Patrick.Grace@infrastructureontario.ca>
Cc: Crnojacki, Zora <zora.crnojacki@ontarioenergyboard.ca>; Evan Tomek <ETomek@uniongas.com>
Subject: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Good Afternoon,

An Environmental Protection Plan (EPP) for the above mentioned project is attached for your review.

Thanks,

Shelley Bechard

Administrative Analyst, Regulatory Projects
Union Gas Limited | An Enbridge Company
50 Keil Drive, Chatham, ON N7M 5M1
Tel: 519-436-4600 x5002075 | Cell: 519-365-7788
Email: sbechard@uniongas.com | uniongas.com

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Evan Tomek

From: Evan Tomek
Sent: May-24-18 5:04 PM
To: 'Jason Homewood'; Shelley Bechard
Subject: RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Thanks Jason – I appreciate your help with this project.

Regards,

Evan Tomek, BES

Environmental Planner *on behalf of*
Union Gas Limited | An Enbridge Company
745 Richmond Street | Chatham, ON N7M 5J5
Tel: 519.436.2460 ext 5236904
Cell: 226.229.9598
email: etomek@uniongas.com



From: Jason Homewood [<mailto:Jason.Homewood@ltvca.ca>]
Sent: May-24-18 3:45 PM
To: Shelley Bechard
Cc: Evan Tomek
Subject: [External] RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Good afternoon Shelley,

I have done a quick review of the EPP for the subject project. I do not have any comments or questions regarding the EPP. Evan has received comments from me for this project earlier this year.

Thanks,

Jason Homewood, P.Geo.

Water Resources and Regulations Technician



Lower Thames Valley Conservation Authority
100 Thames Street
Chatham, Ontario, N7L 2Y8
519-354-7310 x225
jason.homewood@ltvca.ca
www.ltvca.ca

From: Shelley Bechard [<mailto:sbechard@uniongas.com>]
Sent: Tuesday, April 17, 2018 3:55 PM

To: Jason Homewood <Jason.Homewood@ltvca.ca>

Cc: Evan Tomek <ETomek@uniongas.com>

Subject: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Good Afternoon,

An Environmental Protection Plan (EPP) for the above mentioned project is attached for your review.

Thanks,

Shelley Bechard

Administrative Analyst, Regulatory Projects

Union Gas Limited | An Enbridge Company

50 Keil Drive, Chatham, ON N7M 5M1

Tel: 519-436-4600 x5002075 | Cell: 519-365-7788

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Evan Tomek

From: Evan Tomek
Sent: May-30-18 3:45 PM
To: 'Di Fabio, Tony (MTO)'
Subject: RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Hi Tony,

Thank you for your review of the EPP for the above noted project; it is much appreciated.

Regards,

Evan Tomek, BES

Environmental Planner on behalf of
 Union Gas Limited | An Enbridge Company
 745 Richmond Street | Chatham, ON N7M 5J5
 Tel: 519.436.2460 ext 5236904
 Cell: 226.229.9598
 email: etomek@uniongas.com



From: Di Fabio, Tony (MTO) [<mailto:Tony.DiFabio@ontario.ca>]
Sent: May-30-18 10:18 AM
To: Crnojacki, Zora
Cc: Evan Tomek; Shelley Bechard; Walsh, Ashley (MTO)
Subject: [External] RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Hi Zora,

The Ministry of Transportation has reviewed the EPP for the above noted project. Accordingly, we have no comments as the location is outside our permit control area.

Thank you.

Tony Di Fabio
 Team Lead
 Highway Corridor Management Section, Head Office
 Ministry of Transportation

Tel. (905) 704-2656



Highway
 Corridor
 Management

From: Shelley Bechard [<mailto:sbechard@uniongas.com>]

Sent: April-17-18 3:56 PM

To: Di Fabio, Tony (MTO)

Cc: Crnojacki, Zora; Evan Tomek

Subject: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP

Good Afternoon,

An Environmental Protection Plan (EPP) for the above mentioned project is attached for your review.

Thanks.

Shelley Bechard

Administrative Analyst, Regulatory Projects

Union Gas Limited | An Enbridge Company

50 Keil Drive, Chatham, ON N7M 5M1

Tel: 519-436-4600 x5002075 | Cell: 519-365-7788

Email: sbechard@uniongas.com | uniongas.com

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Evan Tomek

From: Kourosh Manouchehri <KManouchehri@tssa.org>
Sent: July-10-18 5:09 PM
To: George Leferman
Cc: Crnojacki, Zora; Evan Tomek; Shelley Bechard
Subject: [External] RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP & Application for a Consultation
Attachments: Chippewas of the Thames First Nation Strathroy - Caradoc.pdf

Hi George,

Please see attached my review letter related to this project.

If you have any question, please contact me.

Regards,



Kourosh Manouchehri, P.Eng., PMP | Engineer

Fuels Safety

345 Carlingview Drive

Toronto, Ontario M9W 6N9

Tel: +1-416-734-3539 | Fax: +1-416-231-7525 | E-Mail: kmanouchehri@tssa.org

www.tssa.org



From: George Leferman [mailto:GJLeferman@uniongas.com]

Sent: June 28, 2018 09:07

To: Kourosh Manouchehri <KManouchehri@tssa.org>

Cc: Crnojacki, Zora <zora.crnojacki@ontarioenergyboard.ca>; Evan Tomek <ETomek@uniongas.com>; Shelley Bechard <sbechard@uniongas.com>

Subject: RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP & Application for a Consultation

Hi Kourosh,

I can confirm this is a distribution project, designed to Clause 12 of CSA Z662-15.

Please find attached our spec sheet containing all the technical information.

Should you require any further details, please let me know.

Thanks,

George Leferman, P.Eng.

Tel: 519-436-4600 x 5002928 | Cell: 226-229-0960

From: Kourosh Manouchehri [<mailto:KManouchehri@tssa.org>]

Sent: Tuesday, June 26, 2018 11:05 AM

To: George Leferman

Cc: Crnojacki, Zora; Evan Tomek; Shelley Bechard

Subject: [External] RE: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP & Application for a Consultation

Hi George,

I reviewed the submitted environmental report. Please confirm that this project is distribution expansion and clause 12 of CSA Z662 will be followed.

Could you please provide project technical information including the maximum operating pressure, material and certification of the PE pipes and fittings and the propose pressure tests?

I will continue with review of this project upon receipt the above requested information.

Regards,



Kourosh Manouchehri, P.Eng., PMP | Engineer

Fuels Safety

345 Carlingview Drive

Toronto, Ontario M9W 6N9

Tel: +1-416-734-3539 | Fax: +1-416-231-7525 | E-Mail: kmanouchehri@tssa.org

www.tssa.org



From: Shelley Bechard [<mailto:sbechard@uniongas.com>]

Sent: April 17, 2018 15:56

To: Kourosh Manouchehri <KManouchehri@tssa.org>

Cc: Crnojacki, Zora <zora.crnojacki@ontarioenergyboard.ca>; Evan Tomek <ETomek@uniongas.com>

Subject: Chippewas of the Thames First Nation Natural Gas Pipeline Project EPP & Application for a Consultation

Good Afternoon,

An Environmental Protection Plan (EPP) and TSSA Application for the above mentioned project is attached for your review.

Thanks.

Shelley Bechard

Administrative Analyst, Regulatory Projects

Union Gas Limited | An Enbridge Company

50 Keil Drive, Chatham, ON N7M 5M1
Tel: 519-436-4600 x5002075 | Cell: 519-365-7788
Email: sbechard@uniongas.com | uniongas.com

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**CHIPPEWAS OF THE THAMES FIRST NATION
DESIGN AND PIPE SPECIFICATIONS
POLYETHYLENE PIPING**

Polyethylene Pipe Design Specifications

Design Factor	-	0.40
Maximum Operating Pressure	-	550 kPa
Test Medium	-	Air or Nitrogen
Minimum Test Pressure	-	770 kPa
Minimum Depth of Cover (General)	-	0.6 m
Minimum Depth of Cover (Road Crossings)	-	0.6 m
Minimum Depth of Cover (Water Crossings)	-	1.2 m

Polyethylene Pipe Specifications

Size	-	NPS 4
Outside Diameter	-	114.3 mm
SDR	-	11
Minimum Grade	-	PE2406
Description	-	C.S.A. B137.4-17
Size	-	NPS 2
Outside Diameter	-	60.3 mm
SDR	-	11
Minimum Grade	-	PE2406
Description	-	C.S.A. B137.4-17



345 Carlingview Drive
Toronto, Ontario M9W 6N9
Tel 416 734 3300
Fax 416 231 1626
Toll Free 1 877 682 8772

www.tssa.org

July 10, 2018

George Leferman, P.Eng.
Advisor, Planning & Design – Community Expansion
50 Keil Drive North, Chatham, ON N7M 5J5

SR# 2294316

Re: Chippewas of the Thames First Nation Strathroy - Caradoc

Dear Mr. George Leferman,

This is in response to your submitted Union Gas Pipeline Project dated May 01, 2018 about the Chippewas of the Thames First Nation Strathroy - Caradoc Project.

I reviewed submitted technical information of the project which were in compliance to the requirements of applicable standard CSA Z662-15 and of Oil and Gas Code Adoption Document, FS-238-18. This project might subject to audit and site visit by TSSA inspector.

Should you have any questions, please contact me at 416.734.3539 or by e-mail at kmanouchehri@tssa.org. When contacting TSSA regarding this file, please refer to the Service Request number provided above.

Yours truly,

Kourosh Manouchehri, P.Eng.,
Fuels Safety Engineer
Tel. : (416) 734-3539
Fax : (416) 231-7525

c. Ms. Zora Crnojacki
Chairperson, OPCC
Ontario Energy Board
P.O. Box 2319
2300 Younger Street, 27th. Floor
Toronto, ON M4P 1E

Indigenous Consultation Report
Union Gas Chippewa of the Thames First Nation
Natural Gas Expansion Project

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Indigenous Consultation Report

Union Gas Chippewa of the Thames First Nation Natural Gas Expansion Project

1. Project Description

Union Gas Limited is proposing to construct a new natural gas pipeline to bring service to Chippewas of the Thames First Nation. The project consists of approximately 5 km of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union Gas Limited's existing pipeline on Chippewa Road and will run east service more residents in the Chippewas of the Thames First Nation community. There are no ancillary facilities required for this project. Please see Schedule 4-A for a map of the general area.

A preferred route for the proposed pipeline has been determined and can be found in the Environmental Report which was sent to Shereen Smithanik at the Ministry of Energy ("MOE") on April 17, 2018 as part of the Ontario Pipeline Coordinating Committee review for this project.

2. First Nation and Métis Communities Consulted

Consistent with the 7th Edition of the Ontario Energy Board's *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 2016* Union Gas was delegated the procedural aspects of the consultation from the MOE. A copy of the Union Gas letter informing the MOE of the project is attached as Schedule 4-B. The following communities were listed by the MOE in the delegation letter (see Schedule 4-C):

Chippewas of the Thames First Nation	Chief Myeengun Henry Kelly Riley, Lands and Consultation Manager
Oneida Nation of the Thames	Chief Randall Phillips Brandon Doxtator, Councillor
Munsee Delaware Nation (information only)	Chief Roger Thomas

3. Consultation Activities

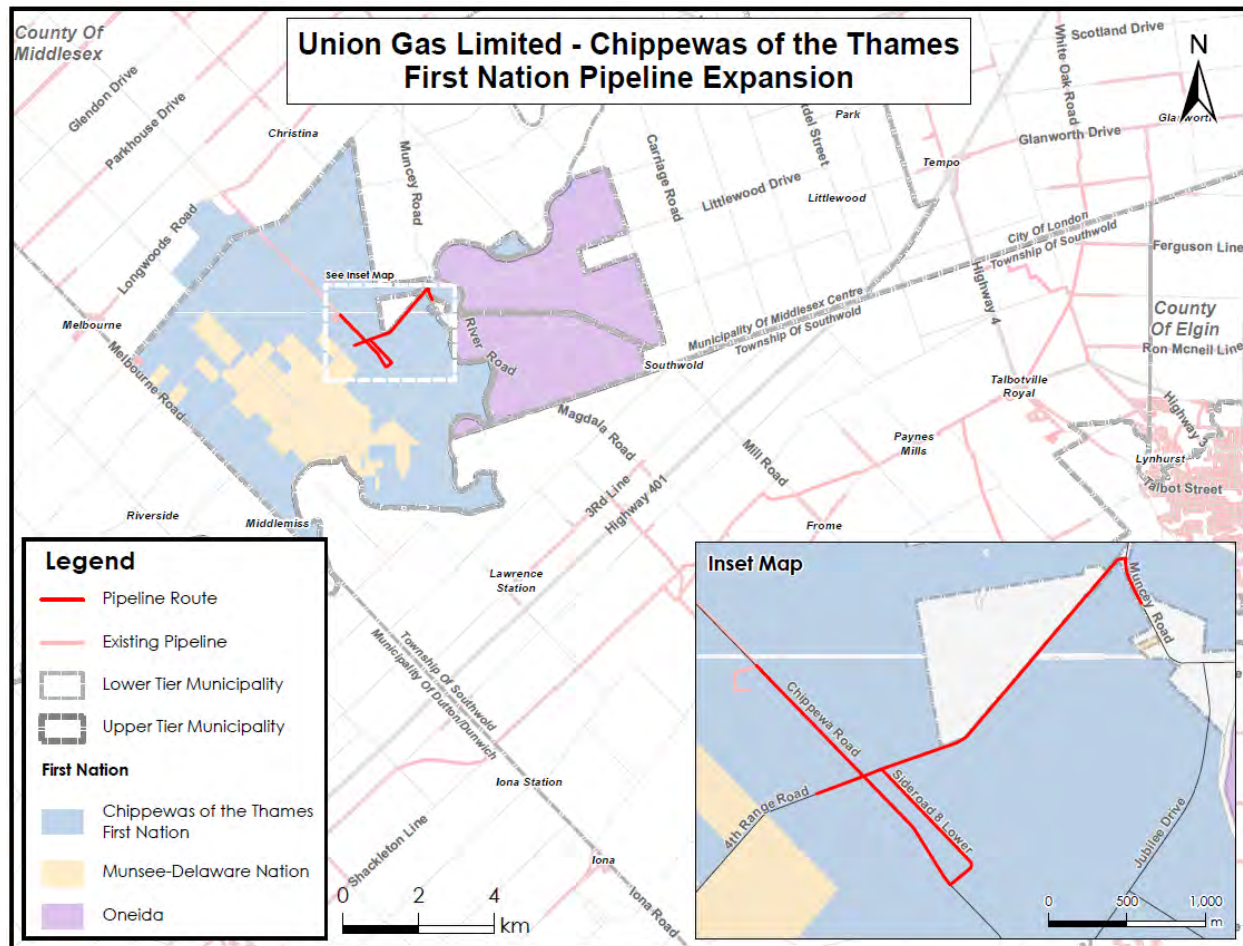
Chippewa of the Thames First Nation				
Date	Activity	Issues raises	Outcome	Doc Location
Oct 20/16	Meeting with Chief Leslie White-Eye, Band Manager, Director of Public Works, Lands and Consultation Manager, Band Secretary Union Gas: John Bonin, Ken McCorkle, James Whittaker, Brian Roberts	Meeting to discuss initial expansion plans for Chippewas of the Thames First Nation. Provided a map of the proposed expansion area. General questions were asked about where the pipe would go, when the expansion would take place, how the PILT repayment and customer charges would work.	Questions answered based on the initial proposal information	Pg. 16
July 19/17	Presentation to working group of Lands and Public Works Joe Wabegijig, Director of Public Works Kelly Riley, Lands and Consultation Manager Eldon French, Public Works assistant Mike Deleary, Development Corp	Discussion on the proposed project which was compared to their future growth areas.		
Oct 19/17	Meeting with Joe Wabegijig, Director of Public Works	Provided update on the proposed project.		
Mar 12/18	Notification letter sent to Chief Henry about the project.	Letter with overview map sent to Chief about expansion project.		Pg. 17 Schedule D
Mar 16/18	Chief and Council presentation Full Chief and Council Board Secretary Band manager Kelly Riley, Lands and Consultation manager	Presentation of the project to Chief and Council. Questions around Band Council Resolution for the project and the economic parameters such as PILT and customer costs	BCR passed by Council. Council provided thanks and stated they were looking forward to the approved project being installed.	
Mar 16/18	Email from Kelly Riley, Lands and Consultation manager	Advising Union Gas that Chief and Council have approved the Union Gas BCR for our Application for Natural Gas Expansion in Chippewas of the Thames First Nation.	Provided copy of BCR for Union Gas	Pg. 19

Mar 29/18	Email to Chief Henry to provide updated information	Provided latest copy of natural gas pipeline expansion map.		Pg. 21 Schedule A
Oneida Nation of the Thames				
Date	Activity	Issues raises	Outcome	Doc Location
Feb 27/18	Telephone call to Brandon Duxtator, Councillor	<p>Call to introduce Ken McCorkle and touch base on the numerous projects that Union Gas has on-going.</p> <p>Set up meeting for Mar 2/18 at the Oneida Nation Political Office to discuss Chippewas of the Thames First Nation natural gas expansion project.</p>	Meeting set for March 2, 2018	
Mar 2/18	Meeting with Brandon Duxtator, Councillor.	<p>Met with Brandon to discuss natural gas expansion into Chippewas of the Thames.</p> <p>Left hard copy of the project area map and advised would also email it over.</p> <p>Brandon raised couple of questions:</p> <p>Was Council on board? Advised that yes, Chippewas of the Thames council was in agreement on the project and in favor of it.</p> <p>Were there going to be monitors from the Chippewas of the Thames? Advised that Chippewas of the Thames will be monitoring their project.</p> <p>Brandon requested a tour of the site once the project begins.</p> <p>We agreed we would continue to consult with each other.</p>	Ken to send map via email to Brandon on March 19	Schedule D
Mar 12/18	Notification letter sent via email to Chief Phillips and Brandon Duxtator	Letter sent advising of the project description.	No follow up required. Consultation on-going.	Pg. 22 Schedule D
Mar 12/18	Email from Brandon Duxtator touching base following meeting.	<p>Brandon provided some follow up items from the consultation meeting.</p> <p>1. Possibility of sending Youth Environmental</p>	Ken McCorkle to address the action items in emails.	Pg. 24

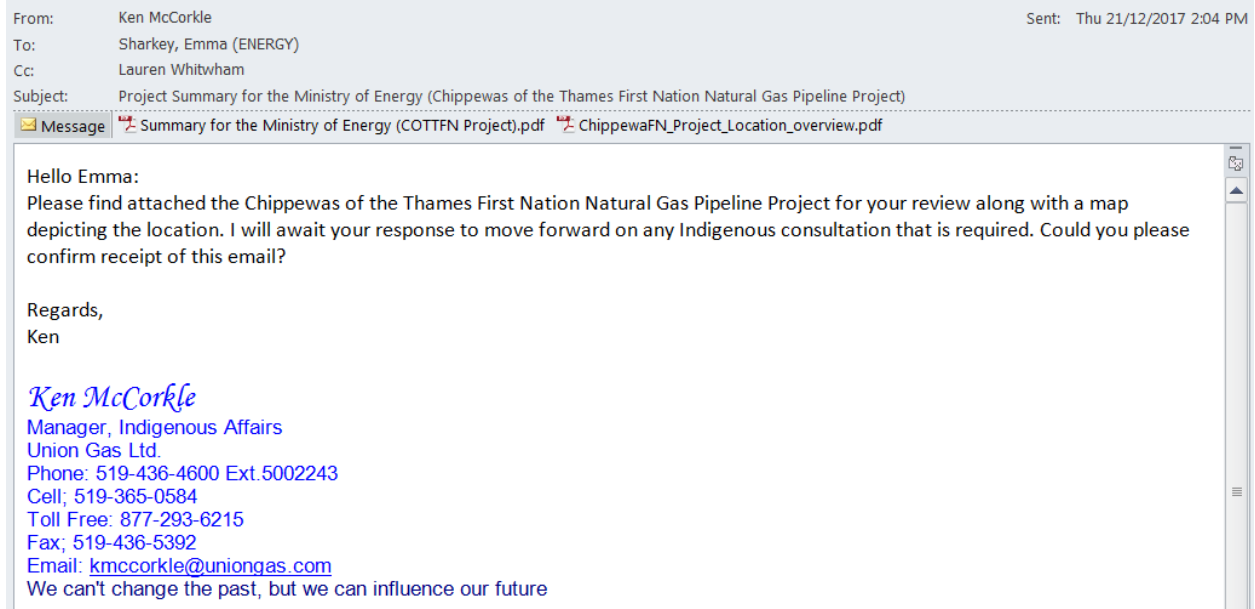
		<p>Mentees to observe a project.</p> <p>2. Continued engagement on these projects as they unfold.</p> <p>3. Electronic copy of the presentation</p> <p>4. A future meeting to discuss Oneida and future development with Natural Gas.</p>		
Mar 19/18	Ken McCorkle email to Brandon Duxtator	Ken provided the electronic copy of the maps provided to Brandon at the March 2 meeting.		Pg. 24 Schedule A Schedule D
Mar 24/18	Ken McCorkle email to Brandon Duxtator addressing follow up items from Mar 12 email.	<p>Ken provided information on Brandon's concerns/follow up items.</p> <p>1. Union will follow up with you regarding the potential for your youth mentees to observe a project during the construction phase by way of a guided tour.</p> <p>2. Union will follow up with you as the projects move forward.</p> <p>3. Electronic copies of the presentations (Chatham Kent Rural project, Kingsville) made to you on march 2nd sent via separate emails due to the size of the file.</p> <p>4. Union will make future arrangements at a mutually agreed upon time to discuss the possibility of Natural Gas expansion to the Oneida Reserve.</p>		Pg. 25
Munsee Delaware Nation				
Mar 12/18	Notification letter sent via email to Chief Roger Thomas	Letter advised of the project and provides details on location.	No following up required. Munsee Delaware Nation is not on the list to consult.	Pg. 26 Schedule D
Mar 21/18	Telephone call with Chief Thomas	Discussed expansion in Chippewas of the Thames First Nation. Chief interested if the expansion could help bring natural gas to Munsee Delaware.	Advised Chief that a new map would be sent over to show proposed expansion area. Will continue to discuss bringing gas to reserve.	
Apr 6/18	Email to Chief Thomas	Provided updated map of expansion area.	No follow up require on this project at this time.	Pg. 28 Schedule A

4. Supporting Documents

Schedule A - Detailed Map



Schedule B – Union Gas letter of notification to Ministry of Energy





December 21, 2017

Ms. Emma Sharkey
Manager, Indigenous Energy Policy
Ministry of Energy
77 Grenville Street, 6th Floor
Toronto, ON M7A 2C1

Dear Ms. Sharkey:

Re: Chippewas of the Thames First Nation Natural Gas Pipeline Project

Enclosed please find Union's Report to the Ministry of Energy to determine the Indigenous Consultation required for the above noted project. I have also enclosed a detailed map of the area.
In the event that you have any questions on the above or would like to discuss in more detail, please do not hesitate to contact me.

Yours truly,

Ken McCorkle

Ken McCorkle
Manager, Indigenous Affairs
Union Gas Limited
50 Keil Drive North
Chatham, ON N7M 5M1
Phone: 519-436-4600 ext. 5002243
Email: kmccorkle@uniongas.com

Union Gas Limited Pipeline Project

Chippewas of the Thames First Nation Natural Gas Pipeline Project – Summary for Ministry of Energy

1. Introduction

This Project Summary Report ("PSR") has been prepared to provide the Ministry of Energy ("MOE") with an overview of the Chippewas of the Thames First Nation Natural Gas Pipeline Project ("Project") to support the preparation of a contact list of indigenous communities that may have an interest in the Project.

1.1 Project Overview

Union Gas Limited ("Union") has been bringing clean, reliable, and affordable natural gas service for more than a century to over 400 communities across Ontario and as part of its Community Expansion Program, is proposing to bring natural gas service to Chippewas of the First Nation. The Project consists of approximately 5 km of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union's existing pipeline on Chippewa Road and will run east to service more residents in the community. There are no ancillary facilities required for this project. The location of the Project is shown on the attached maps.

The following co-ordinates define proposed start point and end point:

	Latitude	Longitude
Start	42°49'10.31"N	81°28'20.27"W
End	42°49'20.37"N	81°26'36.85"W

2. Regulatory Requirements and Approvals

Ontario Energy Board ("OEB") review and approval is required before this project can proceed. As part of that application, an Environmental Protection Plan (EPP) will be prepared in accordance with the OEB *Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario (2016)*. The EPP for the Project will be submitted to the OEB in early spring 2018. Construction of the expansion project is planned to begin in spring 2019 with an in service date of summer/fall 2019.

Other permits and authorizations for the project will be determined and may be necessary at the Federal, Provincial and Municipal levels.

3. Environmental Planning Process

The environmental planning process for the Project will be initiated in the winter of 2018 by Union, with support to be provided throughout the process by consultant archaeologists, cultural heritage specialists, and biologists. The purpose of the Project is to serve as many residents as possible and therefore the pipeline route will be chosen accordingly. The following provides a general overview of the environmental planning process for the Project:

- **Complete an Environmental Protection Plan (EPP)**
 - Describe the proposed work necessary for the Project;
 - Describe the procedures that will be followed during construction of the facilities;
 - Identify potential environmental impacts and recommend measures to minimize those impacts; and
 - Describe the public consultation opportunities.
- **Complete all necessary studies and assessments**
 - An Archaeological Assessment will be conducted by a licensed archaeologist in accordance with the Ministry of Tourism, Culture and Sport (MTCS) guidelines to identify known or potential archaeological resources within the Project area and will develop an appropriate mitigation plan if required.
 - A heritage specialist will review the running line for potential cultural heritage landscapes and built heritage resources and will develop an appropriate mitigation plan if required.
 - A certified biologist will review the running line for potential species at risk and determine if any species will be impacted by construction activities and will develop an appropriate mitigation plan if required.
- **Obtain all necessary environmental permits and approvals**
 - Union will obtain clearance from Chippewas of the Thames First Nation for all watercourse crossings.
 - Union will work with all other relevant governing agencies (i.e. the Ministry of Natural Resources and Forestry) to obtain any permit and/or approval should it be necessary.

4. Consultation

Public consultation is an important part of the environmental planning process and will include discussions with the Chippewas of the Thames First Nation and the First Nations and Métis Nation as identified by MOE.

4.1 *Project Notification*

Union will meet with the Chippewas of the Thames First Nation regarding the Project. Union will also review the project with the First Nations and Métis Nation as identified by MOE.

5. Project Activities

Following Union's standard construction practices, Union will install the distribution pipelines in the road/utility right-of-way. Union's standard construction practices include grading the site, digging the trench, installing the pipeline in the trench, testing the pipeline, and restoring the area to its original condition.

6. Summary and Conclusion

The purpose of this report is to provide MOE with preliminary information regarding the Project and acquire a list of Indigenous communities that may be interested in providing feedback during the project planning process. Field work and data collection will be undertaken to determine the potential effects of this Project during the construction, and operation phases. Mitigation measures to manage these potential effects will be identified and will include proposed monitoring and contingency plans which will be implemented to ensure effects are minimized.

From: Lazakis, Chloe (ENERGY) [<mailto:Chloe.Lazakis@ontario.ca>]

[Next](#)

[Last](#)

Sent: January-29-18 3:00 PM

To: Ken McCorkle

Cc: Smithanik, Shereen (ENERGY)

Subject: [External] questions about COTTEN pipeline project

Hi Ken,

This is Chloe from the Indigenous Energy Policy team at the Ministry of Energy. It was very nice to meet you and Lauren last week!

I am currently working on an ACIT for the Chippewas of the Thames First Nation Natural Gas Pipeline Project. In order to finalize the ACIT and better understand the details of the project I'm hoping you could provide some additional information. I've listed some questions below:

- Could you please share if the project crosses Dawson Creek and if so, will Union Gas need any permits for this? Will the project cross any other water?
- Does the project cross any municipal land or is it completely on reserve? (I believe Shereen spoke to you and mentioned it's partially on municipal land but just verifying.)
- Does the project follow an existing right-of-way or corridor? Would it be possible to provide any additional details about the routing?

Many thanks for any other details you can send us. I'm new on the pipeline file and want to ensure I provide the most refined analysis possible.

Thank you again Ken, take care,
Chloe

Chloë Lazakis | Senior Advisor
Indigenous Energy Policy
Ontario Ministry of Energy

Schedule C - Letter of Delegation of Authority to Union Gas

Ministry of Energy

77 Grenville Street
6th Floor
Toronto ON M7A 2C1
Tel: (416) 314-2599

Ministère de l'Énergie

77 rue Grenville
6^e étage
Toronto ON M7A 2C1
Tél: (416) 314-2599



Indigenous Energy Policy

VIA EMAIL

March 1, 2018

Ken McCorkle
Manager, Indigenous Affairs
Union Gas Limited
50 Keil Drive North
Chatham, ON
N7M 5M1

Re: Chippewas of the Thames First Nation Natural Gas Pipeline Project

Dear Ken McCorkle:

Thank you for your email dated December 29, 2017 notifying the Ministry of Energy of Union Gas Limited's proposal for the Chippewas of the Thames First Nation Natural Gas Pipeline Project as part of its Community Expansion Program and requesting clarification on Duty to Consult requirements.

I understand that Union Gas Limited is proposing to construct a new natural gas pipeline to bring service to the Chippewas of the Thames First Nation. The project consists of approximately 5 kilometers of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union Gas Limited's existing pipeline on Chippewa Road and will run east to service more residents in the Chippewas of the Thames First Nation community. There are no ancillary facilities required for this project.

Proposed Locations	Latitude	Longitude
Start	42°49'10.031"N	81°28'20.27"W
End	42°49'20.37"N	81°26'36.85"W

The Ministry has reviewed the information provided relative to its current understanding of the interests of First Nation and Métis communities in the area and has determined that it may have the potential to affect First Nation and Métis communities who hold or

claim Aboriginal or treaty rights protected under Section 35 of Canada's *Constitution Act* 1982.

As you are aware, the Government of Ontario (the "Crown") has a constitutional duty to consult and accommodate First Nation and Métis communities when Crown project approvals may lead to an appreciable adverse impact on established or asserted Aboriginal or treaty rights. While the legal duty to consult falls on the Crown, the Crown may delegate the day-to-day, procedural aspects of consultation to project proponents. The Ministry of the Energy is delegating the procedural aspects of consultation to Union Gas Limited through this letter.

Community	Mailing Address
Chippewas of the Thames First Nation	320 Chippewa Road, RR #1 Muncey, ON N0L 1Y0
Oneida Nation of the Thames	RR 2 Southwold, ON N0L 2G0

This rights-based consultation list is based on information that is subject to change. First Nation and Métis communities may make new rights assertions at any time, and other developments (e.g. the discovery of Aboriginal archaeological sites) can occur that may require additional First Nation and/or Métis communities to be notified and/or consulted. If you become aware of potential rights impacts on communities that are not listed above at any stage of the consultation and approval process, kindly bring this to the attention of the Ministry with any supporting information regarding the claim. The Ministry will then assess whether it is necessary to include the community on the rights-based consultation list above.

It is the Ministry's expectation that Union Gas Limited will communicate directly with the communities listed above, and that Union Gas Limited will:

- Notify the communities that Union Gas Limited has been delegated the procedural aspects of consultation by the Ministry of Energy on behalf of Ontario.
- Notify the communities that they may contact the Crown directly should they have any questions or concerns.
- Provide the communities with the following contact information should they wish to communicate directly with the Ministry:
 Chloë Lazakis
 Senior Advisor
 Indigenous Energy Policy
 Ministry of Energy
 416-327-2116
 Chloe.Lazakis@ontario.ca
- Please copy the Ministry contact when communicating the above information.

The Ministry relies on consultation conducted by proponents when it assesses the Crown's obligations and directs proponents during the regulatory process. Union Gas Limited's responsibilities for procedural aspects of consultation include:

- Providing the First Nation and Métis communities with timely notice of the project for the purposes of considering possible impacts on their Aboriginal and/or treaty rights;
- In that notice, clearly stating that Union Gas Limited has been delegated the procedural aspects of consultation by the Ministry of Energy on behalf of Ontario for the project.
- Providing First Nation and Métis communities with information about the project including anticipated impacts, and information on project timelines;
- Following up with First Nation and Métis communities to ensure they have received project information and that they are aware of the opportunity to express comments and concerns about the project;
- Explaining the regulatory and approval processes that apply to the project;
- Gathering information about how the project may adversely impact the relevant Aboriginal and/or treaty rights (for example, hunting, fishing) or sites of cultural significance (for example, burial grounds, archaeological sites);
- Considering the comments and concerns raised by First Nation and Métis communities and providing responses;
- Where appropriate, discussing accommodation, including mitigation or other measures to address potential adverse impacts on Aboriginal and/or treaty rights;
- Where appropriate, developing and discussing with the Crown appropriate accommodation measures;
- Taking reasonable steps to foster positive relationships with the First Nation and Métis communities;
- Bearing the reasonable costs associated with these procedural aspects of consultation; and
- Maintaining records of activities in relation to carrying out the delegated procedural aspects of consultation and providing information to the Ministry.

If you have any questions about this letter or require any additional information please contact Chloë Lazakis at 416-326-0513 or Chloe.Lazakis@ontario.ca

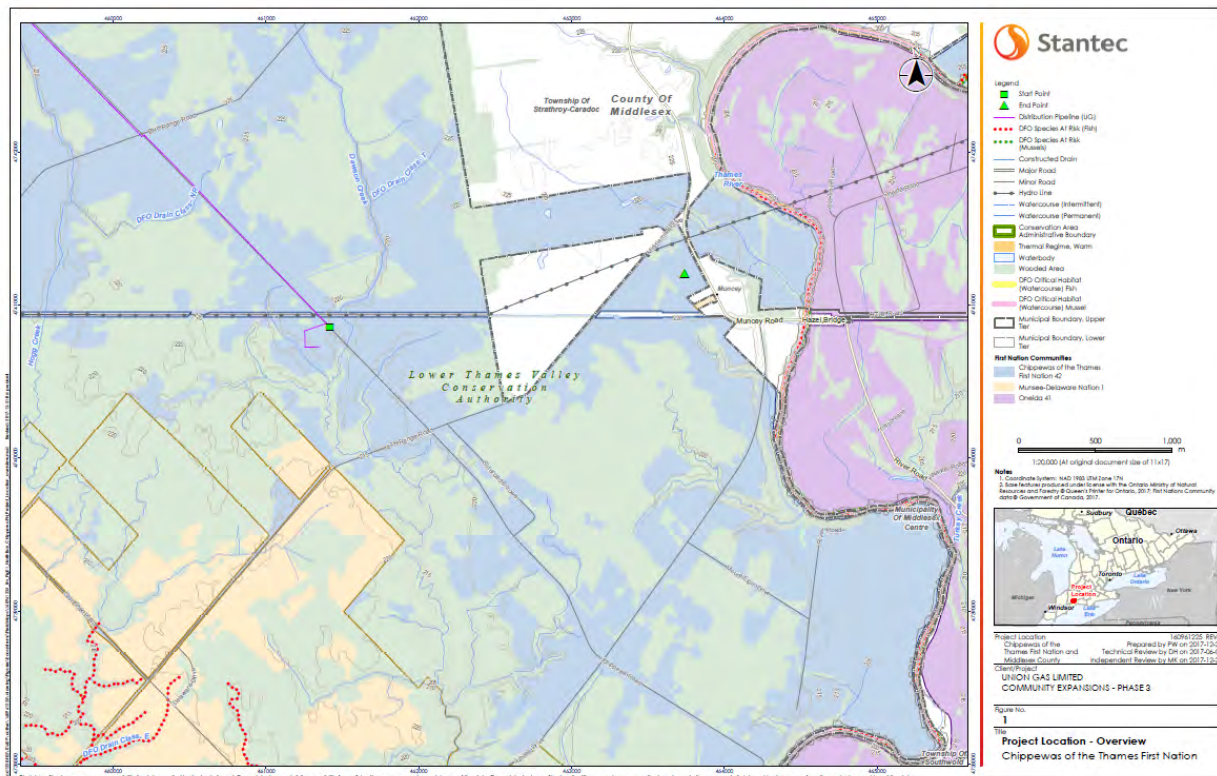
Sincerely,



Emma Sharkey
A/Manager
Indigenous Energy Policy

C: Ontario Pipeline Coordinating Committee (OPCC)



Schedule D – Map sent out with Notification emails



Correspondence – Chippewas of the Thames First Nation

From: Ken McCorkle
To: myeengun@cottfn.com
Cc: Lazakis, Chloe (ENERGY); Lauren Whitwham
Subject: Chippewas of the Thames First Nation Natural Gas Expansion!

Sent: Mon 12/03/2018 4:03 PM

Message:  COTTFN Notification Letter.pdf (203 KB)  ChippewaFN_Project_Location_overview.pdf (1 MB)

Hello Chief Henry:

Please find attached a letter for notification of the Natural Gas expansion project for the Chippewas of the Thames First Nation. If you have any questions please do not hesitate to contact me,

Miigwetch,
Ken

Ken McCorkle

Manager, Indigenous Affairs
Union Gas Ltd.

Phone: 519-436-4600 Ext.5002243

Cell: 519-365-0584

Toll Free: 877-293-6215

Fax: 519-436-5392

Email: kmccorkle@uniongas.com

We can't change the past, but we can influence our future



Chief M. Henry
Chippewas of the Thames First Nation
320 Chippewa Road, RR #1
Muncey, Ontario
N0L 1Y0

March 6, 2018

Re: Union Gas Chippewas of the Thames First Nation Natural Gas Expansion

Dear Chief Henry,

Union Gas Limited has been bringing clean, reliable, and affordable natural gas service for more than a century to over 400 communities across Ontario.

We are proposing to construct a new natural gas pipeline to service the Chippewas of the Thames First Nation. The project consists of approximately 5 kms of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union Gas' existing pipeline on Chippewa Road and will run east to service more residents in the Chippewas of the Thames First Nation community. There are no ancillary facilities required for this project.

We will continue to consult with your community on this proposed project. We are interested in your community's feedback, including any suggestions or proposals on mitigating, avoiding or accommodating any potential impacts to Indigenous or treaty rights.

Union Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor
Indigenous Energy Policy
Ministry of Energy
416-327-2116
chloe.lazakis@ontario.ca

We will continue to meet with your staff and discuss the project with you and provide you with an opportunity to express any questions or concerns you have. Please feel free to contact me at kmccorkle@uniongas.com or 519-365-0584 so we can set up a time to meet.

Miigwech,

Ken McCorkle
Manager, Indigenous Affairs
kmccorkle@uniongas.com
519-365-0584

P.O. Box 2001, 50 Keil Drive North, Chatham, Ontario N7M5M1 www.uniongas.com
Union Gas Limited

From: Kelly Riley [kriley@cottfn.com]
Sent: March 16, 2018 2:57 PM
To: John Bonin; Joe Wabegijig; Myeengun Henry
Cc: Brenda French; Theodore Albert
Subject: Re: [External] RE: Application for Natural Gas Expansion in Chippewas of the Thames First Nation

Hi John

Just to let you know, Chief and Council approved the Union Gas BCR during today's Council meeting (March 16, 2018); for the Application for Natural Gas Expansion in Chippewas of the Thames First Nation.

Have a nice weekend.

[1492524778560_Kelly]



Chippewas of the Thames First Nation

BAND COUNCIL RESOLUTION RÉSOLUTION DE CONSEIL DE BANDE

Chippewas of the Thames 2017 - 2018/51
Resolution no. - No de résolution du conseil Natural Gas Expansion Project

Date of duly convened meeting Date de l'assemblée dûment convoquée	D-I 1 6	M 0 3	Y-A 1 8	Province Ontario
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DO HEREBY RESOLVE:
DECIDE, PAR LES PRÉSENTES:

WHEREAS, access to natural gas infrastructure is not available in all areas of the Chippewas of the Thames First Nation and additional access will provide more affordable and reliable energy and;

WHEREAS, expanding access to natural gas with Chippewas of the Thames First Nation is a key strategic priority supported by Council and;

WHEREAS, access to natural gas for residents and businesses within our community will provide an economic advantage and;

WHEREAS, Natural gas access can provide residents on higher-emitting fuels with a lower carbon energy source that will help reduce greenhouse gas emissions and;

We do hereby resolve:

That this Council of the Chippewas of the Thames First Nation supports making a financial contribution towards the project in an amount equivalent to the Payment In Lieu of Taxes that would be recovered on the new natural gas infrastructure for \$4,796 for a period of up to 10 years as per the natural gas grant program requirement and;

That this Council of the Chippewas of the Thames First Nation supports that a system expansion surcharge of 23 cents per cubic meter from every customer, in the project area for up to 40 years, will be required to assist with the cost of extending natural gas within our community, noting that there will be significant energy savings to our community for our heating needs and;

That this Council of the Chippewas of the Thames First Nation supports conversion of the existing band owned buildings in the 2 years after the project is completed.

Quorum 7

Denise Beeswax
(Councillor, Denise Beeswax)

(Councillor, Beverly Deleary)

(Councillor, Larry French)

(Councillor, Warren Huff)

Michelle Burch
(Chief, A. Mylengun Henry)
(Councillor, Michelle Burch)

(Councillor, Raymond Deleary)

(Councillor, Raleigh Grosbeck)

(Councillor, Leland Sturgeon)

Kodi Christjohn
(Councillor, Kodi Christjohn)

(Councillor, Jacqueline French)

(Councillor, Carolyn Henry)

(Councillor, Darlene Whitecalf)

FOR DEPARTMENTAL USE ONLY - RÉSERVE AU MINISTÈRE					
Expenditure - Dépenses	Authority (Budget Act Section) Autorité (Article de la Loi sur les budgets)	Source of funds Source des fonds Capital Revenue <input type="radio"/> <input type="radio"/>	Expenditure - Dépenses	Authority (Budget Act Section) Autorité (Article de la Loi sur les budgets)	Source of funds Source des fonds Capital Revenue <input type="radio"/> <input type="radio"/>
Recommending officer - Recommandé par			Recommending officer - Recommandé par		
Signature _____ Date _____			Signature _____ Date _____		

From: Ken McCorkle
To: myeengun@cottfn.com; Kelly Riley
Cc: Lauren Whitwham
Subject: Map of Pipeline Expansion to Reserve
Sent: Thu 29/03/2018 4:18 PM
Message 160961225_OEB_Pipeline_Route_ChippewaFN (0321).pdf (703 KB)

Hello Chief Henry and Kelly:

I just wanted to forward and ensure you had the latest copy of the proposed natural gas pipeline expansion map for the reserve. If there are any questions please do not hesitate to contact me.

Miigwetch,
Ken

Ken McCorkle

Manager, Indigenous Affairs
Union Gas Ltd.

Phone: 519-436-4600 Ext.5002243

Cell: 519-365-0584

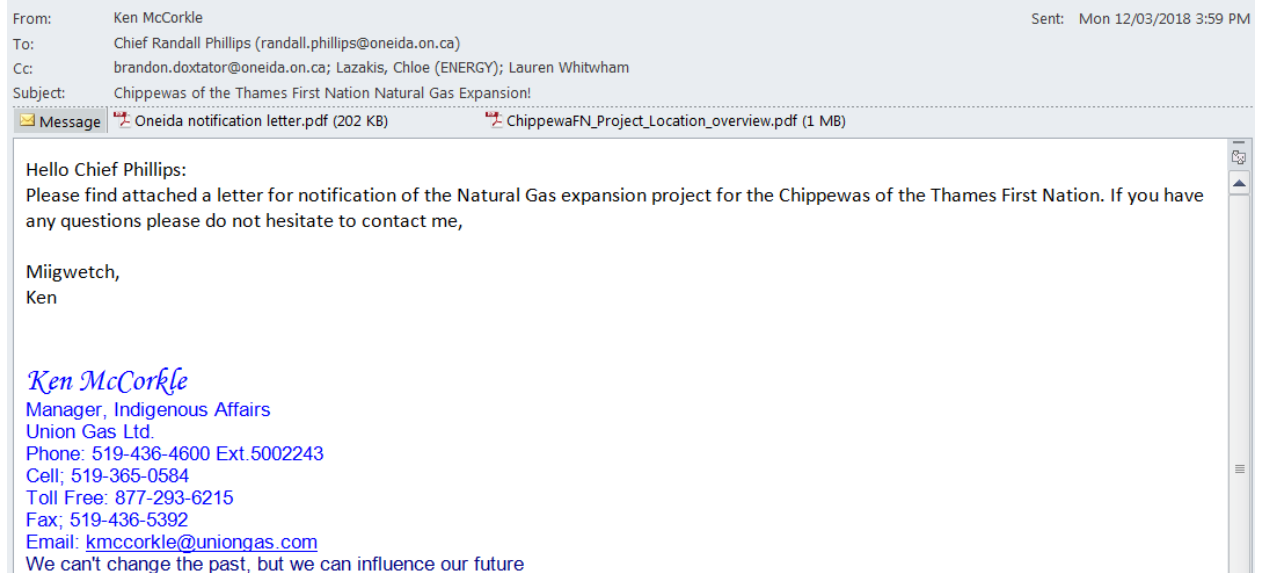
Toll Free: 877-293-6215

Fax: 519-436-5392

Email: kmccorkle@uniongas.com

We can't change the past, but we can influence our future

Correspondence - Oneida Nation of the Thames





Chief Randall Phillips
Oneida Nation of the Thames
RR#2
Southwold, ON N0L 2G0

March 6, 2018

Re: Union Gas Chippewas of the Thames First Nation Natural Gas Expansion

Dear Chief Phillips,

Union Gas Limited has been bringing clean, reliable, and affordable natural gas service for more than a century to over 400 communities across Ontario.

We are proposing to construct a new natural gas pipeline to service the Chippewas of the Thames First Nation. The project consists of approximately 5 kms of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union Gas' existing pipeline on Chippewa Road and will run east to service more residents in the Chippewas of the Thames First Nation community. There are no ancillary facilities required for this project.

We have consulted with your community on this proposed project. We are interested in your community's feedback, including any suggestions or proposals on mitigating, avoiding or accommodating any potential impacts to Indigenous or treaty rights.

Union Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:

Chloë Lazakis
Senior Advisor
Indigenous Energy Policy
Ministry of Energy
416-327-2116
chloe.lazakis@ontario.ca

We will continue to consult with Brandon Duxtator as required for this project and provide him with an opportunity to express any questions or concerns from the community. Please feel free to contact me at kmccorkle@uniongas.com or 519-365-0584.

Miigwech,

Ken McCorkle
Manager, Indigenous Affairs
kmccorkle@uniongas.com
519-365-0584

P.O. Box 2001, 50 Keil Drive North, Chatham, Ontario N7M5M1 www.uniongas.com
Union Gas Limited

From: Brandon Doxtator [<mailto:Brandon.Doxtator@oneida.on.ca>]
Sent: March-12-18 2:30 PM
To: Ken McCorkle
Subject: [External] Union Gas Mtg

Hi Ken,

This is Brandon Doxtator from Oneida Nation of the Thames, we met on March 2nd in Oneida. I just wanted to say thank you for taking the time to come out to the community. I know we talked about some follow up, in terms of

- 1) Possibly sending our Youth Environmental Mentees to observe the project
- 2) Continued engagement on these projects as they unfold
- 3) Electronic copy of the presentations
- 4) and a possible future mtg to discuss Oneida and future development with natural gas.

Thanks again
Brandon Doxtator

From: Ken McCorkle
To: brandon.doxtator@oneida.on.ca
Cc: Lauren Whitwham
Subject: Oneida First Nation: Maps showing the Pipeline Expansion for Chippewa's of the Thames First Nation!

Sent: Mon 19/03/2018 3:36 PM

Message image.pdf (711 KB) image.pdf (792 KB)

Hello Brandon:

I trust this email finds you well my Friend!

Please see the attached two (2) copies of the maps I presented to you at our meeting on March 2, 2018 at your office. This is the electronic copy of the hard copy I left with you regarding Union's Community Expansion program for the Chippewa's of the Thames First Nation. If you have any further questions regarding this please do not hesitate to contact me!

Miigwetch,
Ken

Ken McCorkle

Manager, Indigenous Affairs

Union Gas Ltd.

Phone: 519-436-4600 Ext. 5002243

Cell: 519-365-0584

Toll Free: 877-293-6215

Fax: 519-436-5392

Email: kmccorkle@uniongas.com

We can't change the past, but we can influence our future

You forwarded this message on 26/03/2018 10:13 AM.

From: Ken McCorkle
To: Brandon Duxtator
Cc: Lauren Whitwham
Subject: RE: [External] Union Gas Mtg

Sent: Sat 24/03/2018 8:19 PM

Hello Brandon:

Thank you for the follow up email from our meeting on March 2, 2018. I have responded to your email as marked in red below. If there are any other concerns or questions at this point please do not hesitate to contact me at your convenience.
Again it was a pleasure to meet and speak with you,

Miigwetch,
Ken

Ken McCorkle

Manager, Indigenous Affairs
Union Gas Ltd.
Phone: 519-436-4600 Ext.5002243
Cell: 519-365-0584
Toll Free: 877-293-6215
Fax: 519-436-5392
Email: kmccorkle@uniongas.com

We can't change the past, but we can influence our future

From: Brandon Duxtator [<mailto:Brandon.Duxtator@oneida.on.ca>]

Sent: March-12-18 2:30 PM

To: Ken McCorkle

Subject: [External] Union Gas Mtg

Hi Ken,

This is Brandon Duxtator from Oneida Nation of the Thames, we met on March 2nd in Oneida. I just wanted to say thank you for taking the time to come out to the community. I know we talked about some follow up, in terms of

- 1) Possibly sending our Youth Environmental Mentees to observe the project

Union will follow up with you regarding the potential for your youth mentees to observe a project during the construction phase by way of a guided tour.

- 2) Continued engagement on these projects as they unfold

Union will follow up with you as the projects move forward.

- 3) Electronic copy of the presentations

I have forwarded the electronic copies of the presentations I made to you on march 2nd via separate emails due to the size of the file.



- 4) and a possible future mtg to discuss Oneida and future development with natural gas.

Union will make future arrangements at a mutually agreed upon time to discuss the possibility of Natural Gas expansion to the Oneida Reserve.

Thanks again
Brandon Duxtator

Correspondence - Munsee Delaware Nation (Information only)

From: Ken McCorkle Sent: Mon 12/03/2018 3:50 PM
To: Chief Roger Thomas
Cc: Lazakis, Chloe (ENERGY); Lauren Whitwham
Subject: Chippewas of the Thames First Nation Natural Gas Expansion!

Message:  Munsee Delaware Notification Letter.pdf (409 KB)  ChippewaFN_Project_Location_overview.pdf (1 MB)

Hello Chief Thomas:
Please find attached a letter for notification of the Natural Gas expansion project for the Chippewas of the Thames First Nation. If you have any questions please do not hesitate to contact me,

Miigwetch,
Ken

Ken McCorkle
Manager, Indigenous Affairs
Union Gas Ltd.
Phone: 519-436-4600 Ext. 5002243
Cell: 519-365-0584
Toll Free: 877-293-6215
Fax: 519-436-5392
Email: kmccorkle@uniongas.com
We can't change the past, but we can influence our future



Chief Roger Thomas
Munsee Delaware Nation
RR #1
Muncey, Ontario
N0L 1Y0

March 6, 2018

Re: Union Gas Chippewas of the Thames First Nation Natural Gas Expansion

Dear Chief Thomas,

Union Gas Limited has been bringing clean, reliable, and affordable natural gas service for more than a century to over 400 communities across Ontario.

We are proposing to construct a new natural gas pipeline to service the Chippewas of the Thames First Nation. The project consists of approximately 5 kms of small diameter polyethylene distribution pipelines to service the community. The proposed pipeline will commence at Union Gas' existing pipeline on Chippewa Road and will run east to service more residents in the Chippewas of the Thames First Nation community. There are no ancillary facilities required for this project.

We are providing you with this information as you are in close proximity with Chippewas of the Thames First Nation and wanted to make you aware of the proposed project.

Union Gas has been delegated the procedural aspects for consultation by the Ministry of Energy on behalf of Ontario. Ministry officials are also available should you wish to contact them directly with any questions or concerns. Please contact:


Chloë Lazakis
Senior Advisor
Indigenous Energy Policy
Ministry of Energy
416-327-2116
chloe.lazakis@ontario.ca

If you have any questions or concerns, please feel free to contact me at kmccorkle@uniongas.com or 519-365-0584.

Milgwech,

Ken McCorkle
Manager, Indigenous Affairs
kmccorkle@uniongas.com
519-365-0584

From: Ken McCorkle
To: Chief Roger Thomas
Cc: Lauren Whitwham
Subject: Chippewa of the Thames Community Expansion pipeline project
Sent: Fri 06/04/2018 8:55 AM

Message  Chippewa of the Thames First Nation Community Expansion Detailed Map.pdf (696 KB)

Hello Chief Thomas:

I trust this email finds you well!

I just wanted to follow up on the letter I forwarded and respond to your recent request as per our phone call. I have enclosed a copy of the map you requested showing the natural gas pipe that is being constructed on the Chippewa of the Thames reserve as part of the Provincial community expansion program. If you have any further questions or would like more information do not hesitate to contact me at your convenience.

Miigwetch,
Ken

Ken McCorkle

Manager, Indigenous Affairs

Union Gas Ltd.

Phone: 519-436-4600 Ext.5002243

Cell; 519-365-0584

Toll Free: 877-293-6215

Fax; 519-436-5392

Email: kmccorkle@uniongas.com

We can't change the past, but we can influence our future

Ministry of Energy, Northern
Development and Mines

77 Grenville Street
6th Floor
Toronto ON M7A 2C1

Tel: (416) 325-6544

Ministère de l'Énergie, du
Développement du Nord et des
Mines

77, rue Grenville
6^e étage
Toronto ON M7A 2C1

Tél: (416) 325-6544



Indigenous Energy Policy

VIA EMAIL

January 28, 2019

Ken McCorkle
Manager, Indigenous Affairs
Union Gas Limited
50 Keil Drive North
Chatham, ON
N7M 5M1

Re: Chippewas of the Thames First Nation Natural Gas Pipeline Project – Consultation Sufficiency Opinion

Dear Mr. McCorkle,

The Ontario Ministry of the Energy, Northern Development and Mines has completed its review of Union Gas Limited's Indigenous consultation report for the Chippewas of the Thames First Nation Natural Gas Pipeline Project. This letter is to notify you that based on the information provided and through contacting the communities directly, the Ministry is of the opinion that the procedural aspects of consultation undertaken by Union Gas Limited to date for the purposes of the Ontario Energy Board's Leave to Construct for the Chippewas of the Thames First Nation Natural Gas Pipeline Project is satisfactory.

It is expected that Union Gas Limited will continue its consultation activities with the communities throughout the life of the project, and that Union Gas will notify the Ministry should any additional rights-based concerns/issues arise.

If you have any questions about this letter or require any additional information, please contact Chloë Lazakis at 416-327-2116 or chloe.lazakis@ontario.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Shannon McCabe".

Shannon McCabe
A/Manager
Indigenous Energy Policy

c: Ontario Energy Board
Ontario Pipeline Coordinating Committee
Lauren Whitwham, Union Gas Limited