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September 20, 2019

Delivered by Hand (electronic copy sent via Web Portal)

Ms. Kirsten Walli
Board Secretary
Ontario Energy Board
P.O. Box 2319, 2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Walli:

Re: Ontario Energy Board File No. EB-2019-0007
Imperial Oil Limited - Application for Leave to Construct the Waterdown to
Finch Project in the City of Hamilton, the City of Burlington, the Town of
Milton, the Town of Oakville, the City of Mississauga, and the City of Toronto

Pursuant to the Procedural Order No. 4, as amended of the Ontario Energy Board,
please find enclosed two copies of the Submissions from the City of Mississauga
dated September 20, 2019 with respect to the above-noted proceeding.

Yours truly,

Patrick M. Murphy
Legal Counsel, Environmental

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Imperial Oil Limited
Construction of the Waterdown to Finch Project

**Application under section 90(1) of the *Ontario Energy Board Act, 1998*
OEB File Number EB-2019-0007**

City of Mississauga – Submissions

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**Imperial Oil Limited (“Imperial”)
Construction of the Waterdown to Finch Project (“Project”)
Application for Leave under section 90(1) (Application) of the *Ontario Energy
Board Act, 1998*
OEB File Number: EB-2019-0007**

**City of Mississauga
Submissions**

These Submissions incorporate and adopt the input from other municipalities including the City of Toronto, the Regional Municipality of Peel, the Regional Municipality of Halton and the Toronto and Region Conversation Authority with respect to the Engineering matters as outlined in the City of Toronto’s Submissions to Imperial, with the exception of any submissions specific to the City of Toronto.

A. Executive Summary

1. Imperial Oil Limited (“Imperial”) in its Application states the purpose of replacing the Waterdown to Finch segment of the Sarnia Products Pipeline is to “support continued safe and reliable pipeline operations for decades to come.”¹ The pipeline was constructed in the mid-1950s and based on the company’s ongoing integrity management system it (the “company”) has “elected” to replace a section of the pipeline.²

2. The City of Mississauga submits that it is common knowledge that pipelines can sometimes fail with hazardous consequences especially given the age of the pipeline. Notwithstanding Imperial’s record as a safe and reliable operator, there have been pipeline failures. These pipeline failures have been acknowledged by Imperial³ and also experienced by other pipeline operators, all of which is a matter of public record.⁴

¹ Imperial Oil Application (April 2, 2019), Exhibit C (Purpose, Need, Proposed Project and Timing) Para. 7.

² Ibid, para. 3, 4 and 7.

³ Imperial Response to Interrogatories, para. 10.4a, page 13 of 168

⁴ National Transportation Safety Board, Enbridge Incorporated Hazardous Liquid Pipeline Rupture and Release: Marshall, Michigan.

3. The need to have a safely built and reliable operating pipeline along with assurances that Imperial has taken steps to avoid any spills and damage is of paramount concern to the City of Mississauga, to its residents and its businesses. Aging pipelines have been the primary cause of pipeline failure largely due to a range of corrosion mechanisms, which may lead to reduced structural strength and eventual failure.⁵ Corrosion is not the only factor responsible for pipeline deterioration. Other factors including third party activities, incorrect pipeline operation, inadequate design and faulty construction can have a negative impact on the pipeline condition.⁶

4. The City supports Imperial's decision to replace the 63km section of the pipeline, so long as the Project can be executed safely by protecting City residents, businesses and the natural environment. As outlined herein, the City's submissions expand and focus on key conditions that we submit are required for OEB approval of the Application along with the requirement that Imperial will act on the deliverables in a number of significant areas including land matters, engineering, financial assurance, fire safety and emergency response and protection of the natural environment.

B. Introduction

1. Imperial's Application under sections 90(1) and 97 of the *Ontario Energy Board Act, 1998* for leave to construct 63km of pipeline and associated infrastructure to transport refined oil products (gasoline, diesel and jet fuel) from the City of Hamilton through the City of Mississauga (Mississauga or City) to its Finch Avenue Terminal, in Toronto raises significant concerns for Mississauga.

2. Mississauga is Canada's sixth largest city and home to over 766,000 residents and more than 90,780 businesses.⁷ The City has a land area of 29,212 hectares with 2747 hectares of

⁵ Condition prediction Models for Oil and Gas Pipelines Using Regression Analysis, *Journal of Construction Engineering and Management* 140(6): 04014013, June 2014

⁶ Ibid

⁷ Mississauga Data, www.mississauga.ca/portal/residents/mississaugadata

natural area. These are also 522 parks along with 225km of trails and woodlands.⁸ The Credit River flows south through the City into Lake Ontario at Port Credit, Mississauga. Most of the residents of Mississauga live within the area of the watershed. The Credit River is one of the City's treasured resources which traverses the proposed pipeline route. With the number of pipeline crossing points,⁹ it is of utmost importance that Imperial take all reasonable steps to protect and minimize any risk to City residents and protect the natural environment including the Credit River, its tributaries and surrounding wetlands from any adverse effects during the construction, deactivation (of the existing pipeline) and continued operations of the pipeline. The Project pipeline routing covers a length of 16.52km within Mississauga, which represents the second largest municipality next to the City of Toronto's 17.86km of pipeline.¹⁰

3. The City's submissions as outlined herein are based on the evidence submitted by Imperial from its Application and supporting documents submitted to the Ontario Energy Board (OEB), along with several meetings between the City and representatives of Imperial, and from the technical comments submitted by the City of Toronto and by other intervenors.

4. Mississauga is supportive of Imperial's efforts to upgrade the aging pipeline by replacing the 63km section, but only if the Project meets key "deliverables" as conditions for approval. The scope of these conditions comprise the following key areas:

- **Land Matters**-considerations for both the short term and long term planning;
- **Engineering Matters**-the safety of residents during the construction, deactivation and operation of the pipeline;
- **Financial Assurances**- in a form acceptable to the City which compensates the City for any damage arising from the construction, replacement, deactivation (old pipeline) and continued operations of the pipeline including compensation for any environmental damage associated with any leaks and spills;
- **Fire Safety and Emergency** –emergency response plans satisfactory to the City;

⁸ Ibid

⁹ Environmental Report (February 2019), Table F-4: Watercourse Crossings

¹⁰ Imperial Oil Application (April 2, 2019), Exhibit F (Land Matters) Table 1-2, p. 1 of 6.

- **Protection of the Natural Environment-** from any adverse effects arising from the Project including the protection of Mississauga's rivers, tributaries, parks and source groundwater and any archeological resources which may be found during the construction or deactivation of the pipeline.

Mississauga respectfully submits these key deliverables are necessary and appropriate conditions for Application approval. The City submits these conditions fall within public interest considerations and will assist the OEB in evaluating whether Imperial's Application meets the public interest test¹¹.

C. Land Matters

1. As noted in the OEB Guidelines, the proper selection of a route for a new pipeline is part of the public interest considerations, when the OEB is making its decision.¹² Although Imperial has made reasonable efforts to install the pipeline within the existing corridor, easements will be required. Notwithstanding meetings held between Imperial and the City, Imperial has not provided the City with the criteria for selecting the locations of the easements. The City hereby requests the opportunity to suggest alternative routing as well as assess impacts of the proposed easement locations. The City submits these steps are necessary for both the short and long term planning of Mississauga. This information will assist both parties in aligning, to the extent possible their respective interests.

2. The City has concerns with the proposed 10.75 inch easement even with Imperial's proposed plan to have the pipeline at a depth of 15 to 25 metres below the surface. In order to protect municipal infrastructure and minimize disruption associated with the maintenance of the pipeline, the impact of other utilities, as well as practical offsets of competing pipelines over,

¹¹ OEB, Environmental Guidelines for the Location, Construction and operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition, 2016, p.13

¹² Ibid, p.13

below, and beside the proposed pipeline, the City submits that Imperial requires a larger size easement than what Imperial proposes.

3. The City requests as a condition of approval that Imperial provide specific details as to the depth of the pipe, access routes and pipe locations. This information is essential for the City to assess the environmental impact and ensures the installation of the pipeline aligns with the City's short and long term planning. In addition, the City submits that details of alternative alignments, as suggested by Hydro and Infrastructure Ontario in their deliberations with Imperial are relevant to the City's concerns about the location of easements. The City submits this information is particularly relevant to the City's current and future planning.

4. The City has particular concerns with the proposed location of one of the construction lay down areas because of the City's plans to develop the green space into a garden.¹³ The City submits that Imperial consider other alternatives since the Pinchin Garden was approved by the local Councillor with work scheduled to begin in late 2019.

5. In summary, the City has requested in earlier meetings for Imperial to provide more detailed plans, a pipeline profile and drawings. Imperial anticipates this information to be available in mid-September 2019. The City hereby submits the aforementioned information is a requirement for municipal approval and an essential condition for approval of the Application.

6. In the interim, Imperial and the City are continuing to meet and reach acceptable terms for the form of easement, crossing, and temporary storage agreements. The City has discussed on a preliminary basis various approaches for establishing compensation for access to municipal property, all of which requires supporting evidence from Imperial in the forms of land appraisals. Again, the City submits this information is a requirement for municipal approval and a condition in support Imperial's Application. The City respectfully requests the OEB to incorporate these terms and conditions in its Order or Decision.

¹³ The easement is identified as WTFN 3061. The City has plans in place to develop the green space to be known as the "Pinchin Garden"

D. Engineering Matters-the Safety of Residents during the Construction, Deactivation and Operation of the Pipeline

1. As previously indicated, Mississauga's Submissions incorporate and adopt the submissions by the City of Toronto as well as the other intervenors including the Regional Municipality of Peel and the Regional Municipality of Halton with respect to Engineering matters.

2. A key area of concern for the City is the safety of its residents and protection of public and property during the construction and operation of the pipeline. These concerns apply equally to the deactivation of the existing pipeline especially since more than one activity is likely to occur simultaneously within the pipeline corridor. While the City understands that overall, the pipeline has operated without incident since its installation in the 1950s, Imperial acknowledges there have been releases which have caused concerns to local municipalities and to the general public¹⁴. The City considers the detection of slow, gradual leaks as a significant ongoing concern which may be undetected notwithstanding the leak detection and monitoring measures currently in place.

3. Mississauga acknowledges the steps taken along with the risk mitigation enhancements put in place by Imperial to prevent pipeline leaks and spills.¹⁵ The City requests the aforementioned enhancements and mitigation measures be incorporated into the OEB's Order or Decision. Since the construction and installation of the pipeline may occur concurrently with the deactivation activities, the City requests that Imperial provide additional details to ensure these activities are safely managed.

¹⁴ 1989 release in Flamborough Municipality caused by a minor crack in the pipe associated with the manufacturing process resulted in a slow release of refined product which occurred over time. (Reference: Imperial Response to Interrogatories, p.13 of 168, para. 10.4 b.)

¹⁵ Imperial Response to Interrogatories p.14 of 168.

4. With the planned deactivation of the existing pipeline, Imperial may find that refined petroleum products may have leaked gradually over time without detection leaving the possibility of contaminated soil and groundwater. The City hereby requests that the OEB impose conditions under Section 96(1) of the *Ontario Energy Board Act, 1998* to ensure that Imperial addresses and remediates any soil or groundwater contamination that may be found. The City submits that any required remediation follow the applicable standards administered by the Ministry of the Environment, Conversation and Park.¹⁶

E. Financial Assurances

1. The City of Mississauga is responsible for protecting its residents against financial loss arising from claims or suits against the municipality from damage to City assets and from claims brought by residents or other third parties. The City's Risk Management Division requires that Imperial contractually indemnify the City and have in place, insurance as a "backstop" for any work undertaken within the City which may impact City property or the residents within Mississauga. Typically, it is insurance which backs up the contractual indemnity between the parties. The City acknowledges that Imperial is well capitalized and has the financial resources to support substantially any losses incurred by the Imperial Oil Partnership which operates the downstream business and which includes the pipeline infrastructure of the Sarnia Products Pipeline.¹⁷ Although Imperial has indicated in earlier meetings that it does not disclose the terms of its policies (including policy limits and deductibles), Imperial concedes that it does have in place a program of insurance with established AA+ insurers as noted by S&P Global Ratings.¹⁸

¹⁶ Section 23(1) of the *Ontario Energy Board Act* states that "The Board in making an order may impose such conditions as it considers proper, and an order may be general or particular in its application."

¹⁷ Imperial Response to Interrogatories In p.10-168

¹⁸ Ibid, p. 11-168. From earlier meetings with Imperial, there risk management program favours the placement of insurance to cover catastrophic risk with substantially moot claims and losses within the company's risk retention level.

2. Imperial recognizes and acknowledges there are operational risks in its operating activities as well as the potential to incur financial liabilities which could be substantial depending upon the event. The City requests the OEB require the following conditions in its Order or Decision to ensure the residents of Mississauga can rely upon Imperial to have in place, the financial resources to back-up its indemnity for any costs, claims, liabilities arising from the construction and operation of the pipeline including the deactivation activities of the existing pipeline:
- a. An indemnity agreement between Imperial and the City covering Imperial's obligations to indemnify the City for any, costs, claims, expenses, losses and lawsuits arising from the construction and operation of the replacement pipeline including all activities to deactivate the existing section of the pipeline. The indemnity agreement is to also include Imperial's obligations and conditions for the approval of the Application including any breach by Imperial of the Order or Decision of the OEB.¹⁹
 - b. Imperial is to add the City as and "additional insured" under Imperial's Comprehensive General Liability Insurance policy (CGL Policy) and provide the City with a Certificate of Insurance as evidence of coverage. In the event of a litigated claim, Imperial acknowledges it may be required to produce a certified copy of its CGL policy, if the policy is a document relevant to the claim or lawsuit as per the *Ontario Evidence Act, R.S.O. 1990, C.E.23 or R.R.O. 1990, Reg. 194: Rules of Civil Procedure*.
3. In addition to the above, Imperial has been asked to provide a copy of any and all risk assessments of the Sarnia Products Pipeline undertaken either internally by staff within the corporation or by an outside consultant. Imperial takes the position that any risk assessment is proprietary to the corporation and not available to the parties to the

¹⁹ Imperial and the City have had ongoing discussions regarding the form of indemnity agreement which both parties hope to finalize prior to the OEB Order or Decision.

Project.²⁰ The City continues to advance this request and submits this information is relevant and pertinent to Imperial's Application and is a necessary condition for approval of the Application. The City submits that a risk assessment of the pipeline falls squarely within the public interest in the assessment and mitigation of not only potential environment impacts, but also the potential for City property damage, third party damage and personal injury.²¹ As part of the risk assessment process, there are risk assessment models which consider a number of risk factors in the evaluation of the condition of the pipeline. Attached is Appendix 1 which lists a number of the physical, external and operational factors which are considered in any risk analysis. The City submits that the OEB impose a condition in its Order or Decision that Imperial be required to share any risk assessments with the City's Emergency Management Office and Fire and Safety Department since this information is within the City's mandate to protect its residents. Alternatively, the City requests that any Order or Decision stipulate that as a condition of approval of the Application, that Imperial be required to undertake at its cost, a new risk assessment for the pipeline and discuss the risks along with plans to mitigate risk with all the municipalities. The City submits this information is necessary for not only obtaining a better understanding of the gravity of the risk, but also assists the City Departments in their planning in the event an emergency situation were to arise.

F. Fire Safety and Emergency Response

1. With Imperial's head office located in Calgary, if there is a spill or major pipeline event, the City has concerns with the timeliness of Imperial's emergency response since Imperial does not have the in-house capability to utilize its own staff to respond to an emergency in Ontario. Imperial finds it necessary to hire outside contractors for emergency services. Delays in response time and the availability of equipment remain of

²⁰ August 15, 2019 meeting with Imperial. Other intervenors have made similar requests in Interrogatories submitted to the OEB pursuant to Procedural Orders.

²¹ OEB, Environmental Guidelines for the Location, Construction and operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition, 2016, p.3 and 4.

critical concern. The City acknowledges that Imperial has in place various local resources including support personnel and equipment, but the issue remains about the timing of local emergency response teams on site.²² It is also unclear as to the inventory of equipment on hand and its availability if there is a major event. The City hereby submits that the OEB address in its Order or Decision the importance of responding within a short time after an emergency event and having on hand the necessary equipment.

2. The City also requests that Imperial provide more details regarding the on-site chain of command especially when the City's own Office of Emergency Management and Fire and Emergency Services is expected to be directly involved and would likely be one of the first teams on site, when there is an emergency.
3. Imperial proposes a communications plan focused primarily on the affected residents and businesses due to planned construction activities. The City hereby requests that Imperial's communications plan also include Councillors in the impacted Wards. These steps will provide Councillors and municipal officials with timely and accessible information not only in the event of an incident or emergency, but also for any day-to-day public inquiries regarding the Project.
4. In October 2018, Imperial held a three day large scale emergency response exercise focused on the Humber River and Etobicoke region within the City of Toronto.²³ Mississauga requests the OEB require that Imperial provide the "learnings" from this exercise to assist Mississauga in evaluating the planning, execution, coordination and effectiveness of Imperial's emergency response plans. Any mock emergency response training plan ought to be a requirement for approval of the Application.

²² Response to Interrogatories, p.21, 22 of 168

²³ Imperial SPPL Waterdown to Finch Project, Emergency Response Review and Engagement (August 2019), p.11.

G. The Protection of the Natural Environment

1. Imperial has committed to providing a Contaminated Materials Management Plan to address the handling testing, storage, treatment and disposal of contaminated soil and groundwater.²⁴ In addition, Imperial committed to a Spill Prevention and Response Plan²⁵ to prevent spills and respond to spills during construction, operation and deactivation activities. The City requests receipt of these two reports as a condition for approving Imperial's Application.
2. The erosion of the City's watercourses is of particular concern because of the potential flood risk due to climate change. The City requests that Imperial share erosion data from its water crossing surveys.
3. Imperial has indicated the potential exists for contaminated material to be encountered unexpectedly during construction²⁶. The contamination may be in the form of buried tanks, drums, oil residue or odours. The contamination may also impact soil and groundwater. The City requests that Imperial provide further clarification how these matters are to be managed in the event these materials or conditions are found.

H. Conclusion

1. The City of Mississauga appreciates the opportunity, as an Intervenor to directly participate in Imperial's Application. As previously indicated, representatives from Imperial and the City have met and negotiations continue to narrow the issues and hopefully, reach a resolution. Overall, the City supports the replacement of 63km of the ageing pipeline providing the OEB sets conditions in its Order or Decision for Imperial to meet as part of the Application approval. The City respectfully submits these conditions

²⁴ Environmental Report, Supra, p.5-34

²⁵ Ibid, p.5-34

²⁶ Ibid, p.7-4

are necessary to protect the safety of its residents, its businesses and the natural environment. The City submits the implementation of the conditions, as described herein are required steps to minimize risk during construction, deactivation and for the ongoing operation of the pipeline. In summary, the conditions are listed as follows:

Land Matters

1. Imperial shall file with the OEB, the specific criteria for selecting the location of the easements.
2. Imperial to submit to the OEB, an assessment for the proposed easement location.
3. Imperial shall meet with City representatives to discuss and reach agreement on other City suggested alternative routing of the pipeline easement locations.
4. Imperial to provide to the OEB at least 30 days prior to construction, its reasons for proposing a 10.75 inch easement. The City submits the OEB requires Imperial to require a larger size easement to minimize risk.
5. Imperial shall file with the OEB, at least 30 day prior to commencing construction, details as to the depth of the pipe, access routes and pipe locations.
6. Imperial shall file with the OEB, at least 30 days prior to the start of construction, details of alternative alignments for the easement suggested by Hydro and Infrastructure Ontario.
7. Imperial shall file with the OEB, at least 30 days prior to the start of construction an alternative location to the Pinchin Garden.
8. Imperial shall file with the OEB, at least 30 days prior to the start of construction, detailed plans, a pipeline profile and drawings.

Engineering Matters

9. Imperial shall file with the OEB at least 30 days prior to the construction and deactivation activities, its plans for undertaking these concurrent activities.
10. Imperial shall monitor the effects of any slope instability and regularly report to the City any observable effects.

11. In the course of construction activities, Imperial shall be required to maintain a minimum depth of 8 meters below the Credit River at its deepest point and maintain the same minimum depth beneath any watercourse.
12. Imperial shall be required to file with the OEB the locations of any leaks, contaminated soil or contaminated groundwater, particularly during the deactivation activities of the “old” pipeline.
13. In the event any contamination is found while undertaking the activities described in paragraph 12, above, Imperial shall file its findings, as soon as practicable with the OEB and clean-up any contamination in accordance with applicable law.

Financial Assurances

14. Imperial shall file with the OEB, at least 30 days prior to commencing construction, copies of any and all risk assessments undertaken by Imperial internally as part of its Operations Integrity Program and/or by any external consultants. The City respectfully submits the aforementioned as conditions for approval of the Application.
15. As a condition for proceeding with the approval of the Application, the City respectfully submits to the OEB, that Imperial shall fully indemnify and hold harmless the City of Mississauga, their elected officials, officers, employees and agents (“Indemnitees”) from and against all claims, demands, damages, losses, expenses, costs (including legal fees), actions, suits or proceedings by whomsoever made, brought against the Indemnitees as a result of or in connection with:
 - a. the construction of the Project including the deactivation of the existing segment of the pipeline;
 - b. the operation of the Project;
 - c. any contamination or pollution events arising out of the Project;
 - d. any breach by Imperial of the OEB Decision or Order;
 - e. the exercise by Imperial of any right or obligation under the Decision or Order; or
 - f. any obligation of Imperial imposed or required by law.
16. Imperial shall provide to the City of Mississauga certificates of insurance adding the City as an “additional insured” during the course of the Project.

Fire Safety and Emergency Response

17. Within 30 days of the start of the construction activities, Imperial shall file with the OEB, the following information:

- a. the name and coordinates of Imperial's local emergency response contractor;
- b. the list of equipment and location of equipment available in the event of an emergency; and
- c. a communications plan including a chain of command.

18. Imperial shall conduct fire and emergency response training as a condition of approval and involve in the training and exercise, representatives from the City's Fire and Emergency Services and Office of Emergency Management.

Protection of the Natural Environment

19. Imperial shall provide within 30 days of the start of construction the following plans:

- a. Contaminated Materials Management Plan; and
- b. Spill Prevention and Response Plan

20. Imperial shall provide within 30 days of the start of construction all erosion data associated with water crossing surveys.

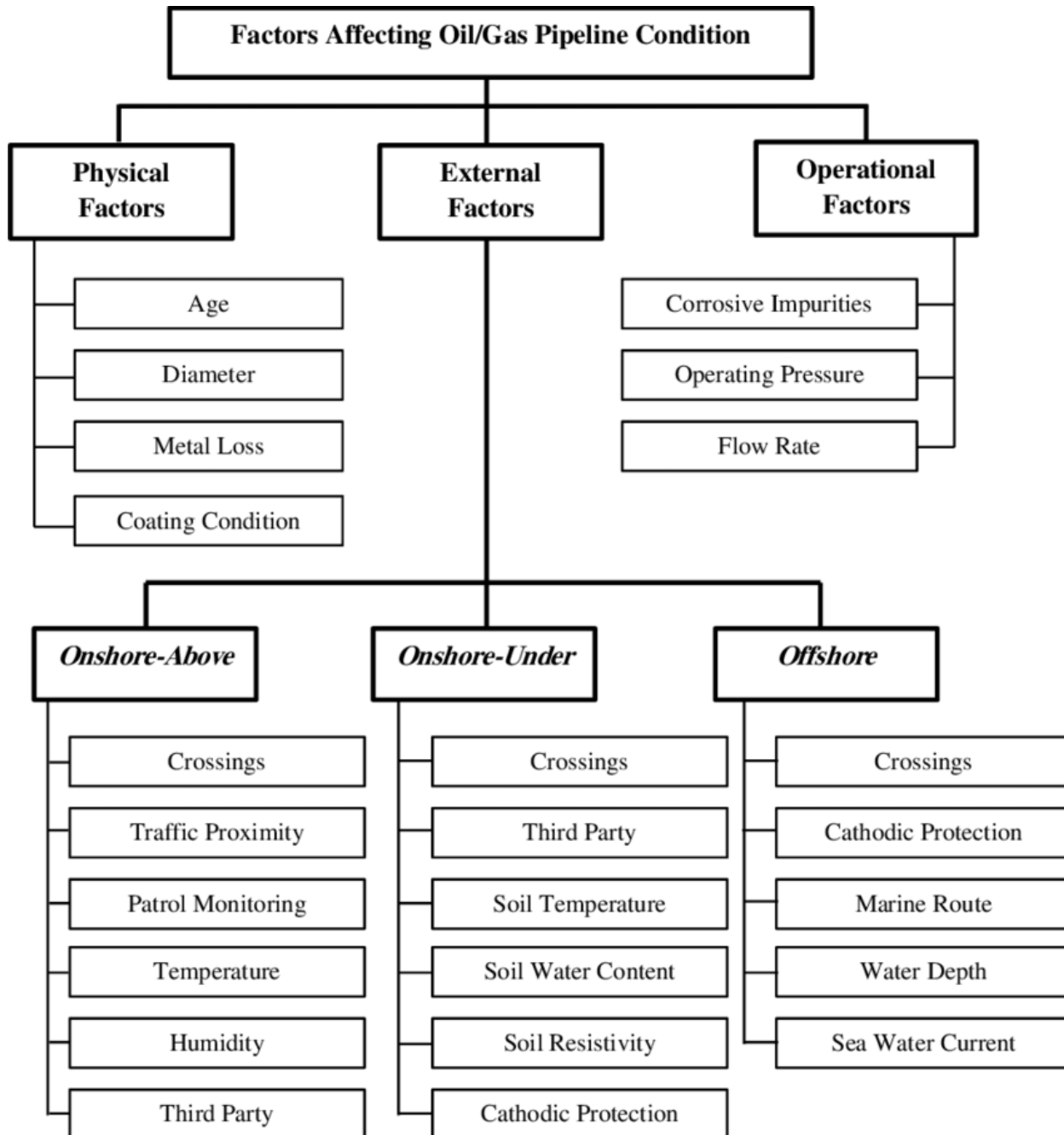
21. The City requests the OEB Order or Decision require Imperial to provide within 30 days of the commencement of construction, a reclamation plan aimed at restoring the natural environment to a condition acceptable to the City.

22. The City of Mississauga's submissions not only raise significant concerns for the municipality, but more importantly require Imperial to commit to and initiate specific actions with respect to the Project for the safety of its residents and businesses and for the protection of the natural environment. Other municipalities have raised similar concerns not only in their respective comments, but also in the Interrogatories filed with the OEB. The City requests the OEB incorporate these conditions in the Order or Decision. Consensus among municipalities particularly with respect to the Technical Matters

reinforces the need for the OEB to impose these conditions and hold Imperial fully accountable for the activities associated with the Project.

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APPENDIX 1



Source: Condition Prediction Models for Oil and Gas Pipelines Using Regression Analysis, Journal of Construction Engineering and Management 140(6): 04014013, June 2014