



Asha Patel
Technical Manager
Regulatory Applications
Regulatory Affairs

tel 416-495-5642
EGIRegulatoryProceedings@enbridge.com

Enbridge Gas Inc.
500 Consumers Road
North York, Ontario M2J 1P8
Canada

December 18, 2020

VIA EMAIL and RESS

Ms. Christine E. Long
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON M4P 1E4

Dear Ms. Long:

**Re: Enbridge Gas Inc. (Enbridge Gas)
Ontario Energy Board (OEB) File No: EB-2020-0065
NPS 26 Branchton Relocation Project (Project)**

In accordance with section 22.07 of the OEB's *Rules of Practice and Procedure*, Enbridge Gas makes the following submissions objecting to certain aspects of the two intervention requests filed in respect of the Project application:

Pollution Probe Intervention Request

Although Pollution Probe has not demonstrated how it or its constituents are directly impacted by the Project, Enbridge Gas accepts that Pollution Probe is a regular intervenor in OEB proceedings and references issues that are relevant to the Project application. Enbridge Gas is prepared to respond to these issues as part of the proceeding. However, Enbridge Gas objects to Pollution Probe's suggestion that, "An oral hearing portion to cross examining experts (including TSSA) would bring value and clarity given the complexity and diversity of opinion on this issue." This statement refers to the applicability and interpretation of the Canadian Standards Association (CSA) Z662 requirements. The OEB should reject Pollution Probe's suggestion for oral examination as unnecessary.

The Technical Standards and Safety Authority (TSSA) is a member of the Ontario Pipeline Coordinating Committee (OPCC) and participated in review of the Project in its capacity as a reviewer and auditor of all new pipeline projects that are submitted to the OEB for leave to construct to ensure that they meet all applicable standards. The TSSA administers the *Technical Standards and Safety Act* and associated regulations, pursuant to which the TSSA has adopted CSA Z662-15 containing the class location requirements that underlie the need for the Project. As part of the OPCC process, the TSSA has reviewed and accepted as compliant the technical aspects of the Project, as set out in the enclosed TSSA letter.¹ The TSSA has fulfilled its mandate to conduct an initial review of the Project as part of the OPCC. There is no need to complicate or

¹ Enbridge Gas is filing this letter as an update to Exhibit C, Tab 2, Schedule 2.

render redundant the OPCC process by providing for oral cross-examination of the TSSA. To do so would be highly extraordinary and inefficient and may bring into question the efficacy of the OPCC process itself. The TSSA has already provided its written views of the Project, like the other OPCC agencies, and has described how it will continue to fulfill its mandate to regulate the construction and operation of this Project. Pollution Probe also mentions “other experts”, but does not offer to engage any experts for the proceeding and Enbridge Gas is also not proposing to engage external experts.

Environmental Defence Intervention Request

Like Pollution Probe, Environmental Defence expresses an interest in the Project arising from its general mandate and objectives as an organization. However, it does not demonstrate how it may be directly impacted by the Project. Nonetheless, the OEB has typically accepted Environmental Defence as an intervenor in gas facility proceedings and Enbridge Gas does not object to answering questions about the need for the Project and any alternatives that were considered. In this regard, Enbridge Gas notes that regulatory compliance and safety are the specific underlying reasons for the Project and not general reinforcement or system expansion. The issues raised by Environmental Defence about declining future gas use and holistic and integrated planning are very similar to the issues that are being adjudicated in the Enbridge Gas Integrated Resource Planning proceeding² and are not appropriate for a Project of this nature for which the primary focus is safety and compliance.

Yours truly,

Asha Patel
Technical Manager,
Regulatory Applications

Encl.

cc: Michael Brophy, Pollution Probe
Kent Elson, Environmental Defence Canada Inc.
Amanda Montgomery, Environmental Defence Canada Inc.

² RP-2020-0091.

OPCC Review Summary

Branchton Replacement Project

In February 2020, Enbridge Gas Inc. completed an Environmental Report (ER) for the Branchton Replacement Project. The ER was emailed to the Ontario Pipeline Coordinating Committee (OPCC), Indigenous Communities and local agencies as part of the OPCC review process. OPCC comments on the ER were requested to be directed to Zora Crnojacki of the Ontario Energy Board and Mark Knight of Stantec Consulting Ltd. By April 15, 2020.

Comments were received from the Ministry of Heritage, Sport, Tourism and Culture Industries, Ministry of Energy and Northern Development, Fuel Safety and Technical Standards and Safety Authority and the Haudenosaunee Development Institute (HDI).

Please see the summary table of all comments received in the OPCC review as well as the attached email correspondence and list of OPCC members.

OPCC Summary

Branchton Replacement Project

RECORD	STAKEHOLDER	COMMENT SUMMARY	RESPONSE SUMMARY
1	<ul style="list-style-type: none"> • Karla Barboza Team Lead, Heritage, Ministry of Heritage, Sport, Tourism and Culture Industries • Email dated February 10, 2020 	Acknowledged received the ER, assigned a staff member to provide comments. Requested the Project Information Form Numbers for the archaeological assessments and an electronic copy of the Cultural Heritage Assessment.	<ul style="list-style-type: none"> • Jackie Corr, Stantec • Email dated February 18, 2020 Provided a list of Project Information Form Numbers and a link to the Built Heritage and Cultural Landscape Assessment.
2	<ul style="list-style-type: none"> • Shannon McCabe Indigenous Energy Policy, Ministry of Energy, Northern Development and Mines • Email dated February 11, 2020 	Requested confirmation of an Indigenous Consultation Report being sent separately.	<ul style="list-style-type: none"> • Jackie Corr, Stantec • Email dated May 29, 2020 Confirmed that an Indigenous Consultation Report will be sent.

<p>3</p>	<ul style="list-style-type: none"> • Kourosh Manouchehri Fuels Safety, Technical Standards and Safety Authority • Email dated February 11, 2020 	<p>Noted an application needs to be filed and submitted to the TSSA as part of Ontario Pipeline Coordinating Committee.</p>	<ul style="list-style-type: none"> • Enbridge • Email dated June 5, 2020 <p>The Application for Review was provided to the TSSA which has completed their review.</p>
<p>4</p>	<p>Todd E. Williams Monitoring Program Coordinator, Haudenosaunee Development Institute (HDI)</p> <ul style="list-style-type: none"> • Email dated February 19, 2020 	<p>Requested the Archaeological consultant be notified that HDI would like to have field monitors participate in the upcoming assessment and requested a copy of the GRCA permit when it becomes available.</p>	<ul style="list-style-type: none"> • Sarah Clarke, Archaeological Research Associates Ltd. • Email dated March 26, 2020 <p>Invited the community to participate in the Stage 2 archaeological assessment, including having a liaison monitor the work and/or circulate a draft copy of the report for their review and comment.</p>
<p>5</p>	<ul style="list-style-type: none"> • Katherine Kirzati Heritage Planner, Ministry of Heritage, Sport, Tourism and Culture Industries <p>Email dated April 7, 2020</p>	<p>Provided comments on the Environmental Report.</p>	<ul style="list-style-type: none"> • Jackie Corr, Stantec • Email dated May 4, 2020 • Provided responses to comments received.

From: [Corr, Jacqueline](#)
To: [Barboza, Karla \(MHSTCI\)](#); [Knight, Mark](#)
Cc: norm.dumouchelle@enbridge.com; [Kirzati, Katherine \(MHSTCI\)](#)
Subject: RE: Environmental Study Report: Branchton Replacement Project [MHSTCI File 0007319]
Date: Tuesday, February 18, 2020 1:59:16 PM

Hi Karla,

Please see below a list of Project Information Form Numbers for the archaeological assessments:

ASI: P057-394-2007 (Stage 1)
ARA: P007-076-2006
P007-0774-2016
P007-0850-2017
P007-0975-2018

Please find here a link to the Built Heritage and Cultural Landscape Assessment: Archaeological Services Inc. (ASI) 2007b. Built Heritage and Cultural Landscape Assessment South Boundary Transportation Corridor Class Environmental Assessment, Regional Municipality of Waterloo, Ontario. Available online:
https://icreate3.esolutionsgroup.ca/230672_ROW_MUunicipal/en/gettingAround/resources/7128-FinalEARReportC.pdf

Thank you,
Jackie

From: Barboza, Karla (MHSTCI) <Karla.Barboza@ontario.ca>
Sent: Monday, February 10, 2020 2:58 PM
To: Corr, Jacqueline <Jacqueline.Corr@stantec.com>; Knight, Mark <Mark.Knight@stantec.com>
Cc: norm.dumouchelle@enbridge.com; Kirzati, Katherine (MHSTCI) <Katherine.Kirzati@ontario.ca>
Subject: FW: Environmental Study Report: Branchton Replacement Project [MHSTCI File 0007319]

Hi Jackie and Mark,

Thanks for sending the Environmental Screening Report for the Branchton Replacement Project to the Ministry of Heritage, Sport, Tourism and Culture Industries.

Katherine Kirzati, MHSTCI Heritage Planner, has been assigned to this file (MHSTCI File 0007319) and will provide comments, as appropriate, by April 15.

The attached ESR refers to a Stage 1 and 2 archaeological assessments and a Cultural Heritage Assessment for the South Boundary Corridor and Franklin Boulevard Extension. Could you please advise what the Project Information Form Numbers are for the archaeological assessments and send us an electronic copy of the Cultural Heritage Assessment?

Thanks in advance,

Karla

Karla Barboza MCIP, RPP, CAHP | (A) Team Lead, Heritage

Ministry of Heritage, Sport, Tourism and Culture Industries
Culture Division | Programs and Services Branch | Heritage Planning Unit
T. 416.314.7120 | Email: karla.barboza@ontario.ca

From: Corr, Jacqueline <Jacqueline.Corr@stantec.com>
Sent: February 10, 2020 1:00 PM
To: Hamilton, James (MHSTCI) <James.Hamilton@ontario.ca>
Cc: Knight, Mark <Mark.Knight@stantec.com>; Norm Dumouchelle <Norm.Dumouchelle@enbridge.com>
Subject: Environmental Study Report: Branchton Replacement Project

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon,

On behalf of Mark Knight, Environmental Planner at Stantec, please see the attached notification letter and Environmental Screening Report (ESR) regarding the Brachton Replacement Project. Please forward any comments you may have regarding the ESR and project to Mark Knight (cc'd). Your comments would be appreciated by April 15, 2020.

Thank you,
Jackie

Jackie Corr, HBAsc, MES
Environmental Consultant
Assessment and Permitting Team
Stantec
300W-675 Cochrane Drive, Markham ON L3R 0B8
Phone: (905) 944-7785
Cell: (437) 235-2984
Jacqueline.Corr@stantec.com



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From: [Corr, Jacqueline](#)
To: [McCabe, Shannon \(ENDM\)](#)
Cc: [Norm Dumouchelle](#)
Subject: RE: Environmental Study Report: Branchton Replacement Project
Date: Friday, May 29, 2020 9:23:00 AM

Good morning Shannon,

I apologize for the delay in response. Yes, I can confirm that an Indigenous Consultation Report will be sent separately to the MENDM.

Thank you,
Jackie

From: McCabe, Shannon (ENDM) <Shannon.McCabe@ontario.ca>
Sent: Tuesday, February 11, 2020 9:34 AM
To: Corr, Jacqueline <Jacqueline.Corr@stantec.com>
Subject: RE: Environmental Study Report: Branchton Replacement Project

Good morning Jackie,

Thanks for sending the ESR. I wanted to confirm that the Indigenous Consultation Report would be sent separately to the Ministry of Energy, Northern Development and Mines?

Thank you,

Shannon
Shannon McCabe
Indigenous Energy Policy
Ministry of Energy, Northern Development and Mines
(647) 924-8139
77 Grenville Street, 6th Floor, Toronto, ON M7A 2C1

From: Corr, Jacqueline <Jacqueline.Corr@stantec.com>
Sent: February 10, 2020 1:59 PM
To: McCabe, Shannon (ENDM) <Shannon.McCabe@ontario.ca>
Cc: Knight, Mark <Mark.Knight@stantec.com>; Norm Dumouchelle <Norm.Dumouchelle@enbridge.com>
Subject: Environmental Study Report: Branchton Replacement Project

CAUTION -- EXTERNAL E-MAIL - Do not click links or open attachments unless you recognize the sender.

Good afternoon,

On behalf of Mark Knight, Environmental Planner at Stantec, please see the attached notification letter and Environmental Screening Report (ESR) regarding the Branchton Replacement Project. Please

forward any comments you may have regarding the ESR and project to Zora Crnojacki and Mark Knight (cc'd). Your comments would be appreciated by April 15, 2020.

Thank you,
Jackie

Jackie Corr, HBAsc, MES

Environmental Consultant
Assessment and Permitting Team

Stantec

300W-675 Cochrane Drive, Markham ON L3R 0B8

Phone: (905) 944-7785

Cell: (437) 235-2984

Jacqueline.Corr@stantec.com



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From: Kourosh Manouchehri
To: [Corr, Jacqueline](#)
Cc: [Knight, Mark](#); [Norm Dumouchelle](#)
Subject: RE: Environmental Study Report: Branchton Replacement Project
Date: Tuesday, February 11, 2020 8:05:11 AM
Attachments: [image001.jpg](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Hi Jackie,

An application needs to be filled and submitted for the review of this project by TSSA as part of Ontario Pipeline Coordinating Committee. Please fill [Application for Review of Pipeline Project](#) and send it to the email address provided on the form.

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: Corr, Jacqueline <Jacqueline.Corr@stantec.com>

Sent: February 10, 2020 14:05

To: Kourosh Manouchehri <KManouchehri@tssa.org>

Cc: Knight, Mark <Mark.Knight@stantec.com>; Norm Dumouchelle <Norm.Dumouchelle@enbridge.com>

Subject: Environmental Study Report: Branchton Replacement Project

Good afternoon,

On behalf of Mark Knight, Environmental Planner at Stantec, please see the attached notification letter and Environmental Screening Report (ESR) regarding the Branchton Replacement Project. Please forward any comments you may have regarding the ESR and project to Mark Knight (cc'd). Your

comments would be appreciated by April 15, 2020.

Thank you,
Jackie

Jackie Corr, HBAsc, MES

Environmental Consultant
Assessment and Permitting Team
Stantec
300W-675 Cochrane Drive, Markham ON L3R 0B8
Phone: (905) 944-7785
Cell: (437) 235-2984
Jacqueline.Corr@stantec.com



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Technical Standards and Safety Authority
 345 Ca ingviewOrive
 Toronto,OntarioM9VV 6N9
 Fax: 416.231.4078
 CustomerService: 1.877.682.8772
 Email:fssubmiss1ons@tssa.org
 www.tssa .org

Application for Review of Pipeline Project

Technical Standards and Safety Act
 Fuels Safety Regulations

Please submit completed application and supporting documentat ion by mail. **fax.** or email (in pdf format).

Project Name or Title: Branchton Class Location

Required Documentation (eligible PDFs are acceptable)

Design and piping specifications related to the project

Calculation of High consequence area

Project time-line related to design and construction (approximate dates are acceptable)

Length of pipeline project: 1.9- KM Diameter of Pipe: NPS 2_6

Pipe Material and its Standard Steel C.S.A Standard 2245 1-18

Pipe wall thick ness 9s_m_m

Stress level on pipe wall based on the design pressure; S/SMYS_47.76 - - - - =*y*

Maximum Operating Pressure: 6160 kPa

TSSA Transnission or Distribution license number: _____

For Office Use Only

A. APPLICANT

Company Name: Enbr idge Corporation No.:

Street Name / 911 Number/Address,if applicable: 50 Keil Drive Norht

UniVSu e: 2001 POBox:

Cfy/To'Ml: Chatham Province: Ontario Postal Code: N7M 5M1

TelephoneNo.: 519-436-4600 x 500222 4 Fax No.: 519-436-5292 Cell No.: 519-350-3169

Email: Tom.Debevc@enbridge.com

Print Name of Contact Person: Tom Debevc

B. LOCATION ADDRESS: Start and end location of the pipeline project (if applicable)

Lat/long 43 335945 degrees, -80 286777

to LaUlong: 43.33862 degree , -80.263248

C. TECHNICAL CONTACT Same as: LAI A U D
 (Company should communicate regarding engineering and inspection approval on behalf of the owner.)

Company Name:

Street Name/ 911 Number/Address,if applicable:

UniVSutte: PO Box:

City/To'Ml: Province: Postal Code:

Telephone No.: Fax No.: Cell No.:

Email:

Print Name of Contact Person:

Note: It is illegal to use an appliance, equipment, or work for its intended purpose unless it is approved.
 Please note that this approval may be revoked or suspended if the relevant review and inspection fees are not paid in full



Technical Standards and Safety Authority
 345 Carlingview Drive
 Toronto, Ontario M9W 6N9
 Fax: 416.231.4078
 Customer Service: 1.877.682.8772
 Email: fssubmissions@tssa.org
www.tssa.org

Application for Review of Pipeline Project
Technical Standards and Safety Act
 Fuels Safety Regulations

Location Address:

D. INVOICEE (Company responsible for fees invoiced for approval including engineering and inspection fees.)			
Company Name: Enbridge			
Street Name/911 Number/Address, if applicable: 50 Keil Drive North			
Unit/Suite:		PO Box: 2001	
City/Town: Chatham		Province: Ontario	Postal Code: N7M 5M1
Telephone No:		Fax No:	Cell No: 519-350-3169
Email: Tom.Debevc@enbridge.com			
Print Name of Contact Person: Tom Debevc		Signature of Contact Person	

FEEES FOR ENGINEERING REVIEW AND INSPECTION

Check box to request type of service.

- Regular Service:** 20-30 working days for engineering and inspection services.
Standard Fee: \$177.41 (13% HST included) per hour for engineering review and \$159.33 (13% HST included) per hour for inspection services
- Rush Engineering Service Only:** 5 to 10 working days.
Fee: 2 x Standard fee for engineering review.
- Rush Engineering and Inspection Services:** 5 to 10 working days for each service.
Fee: 2 x Standard fee for engineering review and inspection services.

Legal Disclaimer- The owner agrees to indemnify and hold harmless the Technical Standards and Safety Authority, its employees, agents, successors and assigns from any and all damages, actions, suits, claims or loss arising from the granting of this variance. In the event of claims made against TSSA arising from the granting of this variance, the owner accepts, on demand, to defend such actions on behalf of TSSA and to assume any costs, legal or otherwise, for the defense or settlement of such claims. Failure to comply with any of the terms and conditions of the variance voids the variance.

Deposit Payment Method

Deposit of \$620.94 (13% HST included) must accompany each application. Invoice will only be issued for the amount billed over and above the deposit.

HST Registration No.: 891131369

Signature of Card Holder X

Thomas Debevc

Date MAY 4, 2020

Payment Receipts can be requested by calling our Customer Contact Centre at 1.877.682.8772 only after the payment has been processed.



December 01, 2020

Re: Trafalgar NPS26, Branchton Replacement Project - TSSA file SR# 2860996 - OEB file number: EB-2020-0065

The applicable regulation that applies to Windsor Line Replacement Project is [Ontario Regulation 210/01: Oil and Gas Pipeline Systems](#). The applicable standard for this project is CSA Z662-15 which TSSA adopted under [FS-238-18 - Oil and Gas Pipelines CAD Amendment \(February 15, 2018\)](#). The mentioned Code Adoption Documents (CAD) specifies the standards that are adopted by TSSA and any changes or addition to the requirements of CSA Z662-15.

TSSA reviews and audits all new pipeline projects that are submitted to OEB for leave to construct. The review of the new pipeline projects submitted to OEB consist of reviewing the technical aspect of the project and focused on compliance to the adopted standards and O.Reg.210/01. TSSA has authority to issue order to operator for any non-compliances to the regulation and/or adopted standards.

This project so far has been reviewed on the technical aspects of the project including design, material specification, wall thickness calculation and high consequence area calculation. TSSA did not find any non-compliances to the regulation, code adoption document and adopted standard.

This project might be selected for audit and site visits to ensure compliance with applicable technical and safety standards for construction and operation of this project.

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,

A handwritten signature in black ink, appearing to read "Kourosh Manouchehri".

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

cc. Tom Debevc, P.Eng.
Senior Advisor Construction Projects
Engineering Construction

From: Todd Williams
To: [Ken McCorkle](#)
Cc: [Knight, Mark](#); norm.dumouchelle@enbridge.com; [Wayne \(HDI\) Hill](#); [Karl Hill](#); [HDI Tracy](#); [HDI](#); [Corr, Jacqueline](#)
Subject: Fwd: Branchton Replacement Project – Environmental Study Report
Date: Wednesday, February 19, 2020 3:03:43 PM
Attachments: [HDI-Williams let OPCC Indigenous-20200210 fnl mrged.pdf](#)

Afternoon Ken,

From the report, I noted that a Stage 3 archaeology assessment is still required and that a permit from the GRCA may be needed.

Can you notify the Archaeological consultant that HDI would like to have field monitors participate in the upcoming assessment and a copy of the GRCA permit forwarded to HDI, if or when it becomes available.

Thanks Todd

Todd E. Williams, P.Eng

Monitoring Program Coordinator

Haudenosaunee Development Institute (HDI)

Haudenosaunee Confederacy Chiefs Council (HCCC)

Six Nations of the Grand River Territory

O: [519-445-4222](tel:519-445-4222)

M: [519-761-1794](tel:519-761-1794)

<https://www.haudenosauneeconfederacy.com/>

Begin forwarded message:

From: "Corr, Jacqueline" <Jacqueline.Corr@stantec.com>
Subject: Branchton Replacement Project – Environmental Study Report
Date: February 10, 2020 at 1:06:32 PM EST
To: "hdi2@bellnet.ca" <hdi2@bellnet.ca>
Cc: "kmccorkle@uniongas.com" <kmccorkle@uniongas.com>, "Knight, Mark" <Mark.Knight@stantec.com>, Norm Dumouchelle <Norm.Dumouchelle@enbridge.com>

Good afternoon,

On behalf of Ken McCorkle, Senior Advisor at Enbridge Gas, please see the attached notification letter and Environmental Screening Report (ESR) regarding the Branchton Replacement Project. Please forward any comments you may have regarding the ESR and project to Ken McCorkle (cc'd). Your comments would be appreciated by April 15, 2020.

Thank you,

Jackie Corr, HBAsc, MES

Environmental Consultant

Assessment and Permitting Team

Stantec

300W-675 Cochrane Drive, Markham ON L3R 0B8

Phone: (905) 944-7785

Cell: (437) 235-2984

Jacqueline.Corr@stantec.com



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From: Sarah Clarke
To: tworowarchaeology@gmail.com
Cc: "[Monica Maika](#)"; [Paul Racher - ARA](#); [Norm Dumouchelle](#); [Tom Debevc](#)
Subject: [External] Stage 2 NPS 26 - Invitation to Participate - HCCC
Date: Thursday, March 26, 2020 10:06:35 AM
Attachments: [image001.png](#)
[2020_0033_StudyArea.kmz](#)
[Prelim PIF Map.png](#)

EXTERNAL: PLEASE PROCEED WITH CAUTION.

This e-mail has originated from outside of the organization. Do not respond, click on links or open attachments unless you recognize the sender or know the content is safe.

Dear Wayne,

Archeological Research Associates Ltd. (ARA) has been contracted by Enbridge Gas Inc. (Enbridge) to undertake the Stage 2 archaeological assessment for the proposed re-alignment of a section of the NPS 26 pipeline in the Geographic Township of Dumfries. The subject lands are approximately 0.60 ha (1.48 ac) in size and are located on Lot 5, Concession 9 in the aforementioned township (see attached KMZ). The proponent has asked us to take this time to invite your community to participate in the Stage 2 archaeological assessment. Participation could include having a liaison monitor the archaeological work and/or ARA circulating a draft copy of the report for your review and comment.

The Stage 2 assessment will be conducted in order to document any archaeological resources that may be present in the areas of archaeological potential. Currently the site comprises ploughed agricultural field as well as lands where ploughing is not possible or viable. As such, the proposed field methods are as follows:

- 0.56 ha (1.38 ac) Pedestrian Survey at an Interval of = 5 m
- 0.04 ha (0.10 ac) Test Pit Survey at an Interval of = 5 m

It has been assumed that the Stage 2 assessment will take 1 day with a crew of 2 people (1 Field Director, 1 Field Technician).

If you would like to participate in the Stage 2 archaeological assessment by providing a community liaison or reviewing the draft report upon completion, **please contact Sarah Clarke** sclarke@arch-research.com or 519-755-9983 to confirm. Given the developing situation with the COVID-19 pandemic, it is possible that there may be a delay in starting fieldwork. At this point, it is anticipated that this fieldwork will be scheduled to occur toward the end of April. If there is any other way that your community would like to participate in the study that has not been suggested we are happy to discuss any options you bring to our attention.

Kind regards,
Sarah

Sarah Clarke, Hons. B.A.
Team Lead-Research; Team Lead-Archaeology
Team Member-Indigenous Engagement and Accomodation

Archaeological Research Associates Ltd
219-900 Guelph Street, Kitchener, ON, N2H 5Z6
P 519.755.9983 | F 519.286.0493

www.arch-research.com

[@ArchResearch @ARAHeritage](#)

smallified



From: [Corr, Jacqueline](#)
To: "Katherine.Kirzati@ontario.ca"
Cc: "Zora.Crnojacki@oeb.ca"; "[Norm Dumouchelle](#)"
Subject: RE: Branchton Pipeline Replacement ESR MHSTCI Comments
Date: Monday, May 4, 2020 10:00:00 AM
Attachments: [MTHSCI_Response_20200504_fin.pdf](#)

Good morning Katherine,

Please find attached our responses to your comments on the Environmental Study Report.

Thank you,
Jackie

Jackie Corr, HBAsc, MES

Environmental Consultant
Assessment and Permitting Team
Stantec
300W-675 Cochrane Drive, Markham ON L3R 0B8
Phone: (905) 944-7785
Cell: (437) 235-2984
Jacqueline.Corr@stantec.com



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From: Kirzati, Katherine (MHSTCI) <Katherine.Kirzati@ontario.ca>
Sent: Tuesday, April 7, 2020 10:07 AM
To: Knight, Mark <Mark.Knight@stantec.com>; Norm.Dumouchelle@enbridge.com
Cc: Crnojacki, Zora <Zora.Crnojacki@oeb.ca>
Subject: Branchton Pipeline Replacement ESR MHSTCI Comments

Good Day Mark:

Attached please find our comments on the Environmental Study Report for the above-noted project.

Regards, Katherine

Katherine Kirzati
Heritage Planner

Ministry of Heritage, Sport, Tourism and Culture Industries
Heritage Planning Unit Programs and Services Branch
401 Bay St, Suite 1700 Toronto, ON M7A 2R9

416.314.7643

katherine.kirzati@ontario.ca

Ministry of Heritage, Sport,
Tourism and Culture Industries

Programs and Services Branch
401 Bay Street, Suite 1700
Toronto, ON M7A 0A7
Tel: 416.314.7643

Ministère des Industries du Patrimoine,
du Sport, du Tourisme et de la Culture

Direction des programmes et des services
401, rue Bay, Bureau 1700
Toronto, ON M7A 0A7
Tél: 416.314.7643



April 7, 2020

Email Only

Mark Knight
Senior Associate, Environmental Planner
Stantec Consulting Limited
[100-300](tel:100-300) Hagey Blvd
Waterloo, ON N2L 0A4
mark.knight@stantec.com

MHSTCI File : 0007319
Your File : 160961351
Proponent : Enbridge Gas Inc.
Subject : Application for Leave to Construct
Project : Replacement of a Portion of the Branchton Pipeline (Dawn Parkway NPS 26)
Location : South of the Cambridge-North Dumfries Municipal Boundary and North of Morrison Road, Travelling from East of Cheese Factory Road to East of Branchton Road, Township of North Dumfries, Region of Waterloo

Dear Mr. Knight:

Thank you for providing the Ministry of Heritage, Sport, Tourism and Culture Industries (MHSTCI) with the *Branchton Replacement Project Environmental Study Report* (Stantec, February 7, 2020) for the application by Enbridge Gas Inc. to the Ontario Energy Board (OEB) for Leave to Construct the replacement pipeline. MHSTCI's interest in this project relates to its mandate of conserving Ontario's cultural heritage.

Project Summary

Due to the Region of Waterloo expanding the road system in the City of Cambridge from Water Street to Dundas Street, and extending Franklin Boulevard, Enbridge Gas has been ordered to move the existing pipeline outside of the road construction area. Approximately 1.7 km of pipeline, from the existing Galt Gate Station eastward to a tie-in point with the current pipeline, will be replaced by re-routing it south of its current position.

General Remarks

Please note that the OEB issued the [Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition](#) (Guidelines) to assist applicants how to identify, manage and document

environmental impacts. The Guidelines encourage applicants to consult with the Ontario Pipeline Coordinating Committee (of which MHSTCI is a member) and other agencies.

Among the planning activities outlined in Chapter 2 of the Guidelines, an applicant is advised to:

- describe the rationale for study area delineation (including construction staging, land requirements);
- identify existing baseline environmental conditions;
- identify potential environmental impacts expected to occur during construction and operation of the project, including cumulative impacts;
- describe proposed measures to mitigate potential negative impacts.

Comments

Table of Contents

The report does not appear to contain a section that describes the existing conditions, as per the requirement of Chapter 2 of the Guidelines. Please explain why it has not been included or, preferably, please insert a section on the existing conditions.

As per the comments below for Appendix A, please amend the title accordingly.

2.0 Environmental Screening and Recommended Mitigation Measures

2.2.3 Archaeological Resources

This section notes that Stage 3 archaeological assessment, and potentially a Stage 4, will be required for a portion of the study area. Archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommend that:

1. the archaeological assessment of the project area is complete and
2. all archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3) of the *Ontario Heritage Act*) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.

2.3.4 Cultural Heritage Resources

This section states that a cultural heritage assessment was conducted in 2007 and the report (*Built Heritage and Cultural Landscape Assessment, South Boundary Transportation Corridor, Class Environmental Assessment, Regional Municipality of Waterloo, Ontario*, Archaeological Services Inc., September 2007, revised April 2008) has been used for this project, as the study area for that project encompassed the current study area. The 2007 report was provided to MHSTCI under separate cover.

Section 2.3.4 notes that the 2007 report found a cultural heritage landscape south of the current study area. However, this cultural heritage resource has not been identified in this ESR. Please provide a municipal address or legal description so that its proximity to the current study area can be ascertained and cross-referenced with the 2007 assessment.

The current entry indicates that no impacts are anticipated, however it does not describe the potential impacts that may occur, nor does it provide a rationale for not requiring mitigation measures. Please amend this section accordingly.

Appendix A Environmental and Socio-Economic Features

The title to this appendix does not reflect its contents, which is a map of the study area. Please amend the title to "Study Area". This will tie-in with all entries in the body of the report that refer to Appendix A (e.g. Section 1.2 and Section 2.0).

Should you have any questions, please contact the undersigned.

Regards,

Katherine Kirzati
Heritage Planner
Heritage Planning Unit
katherine.kirzati@ontario.ca

c: Norm Dumouchelle, Enbridge Gas Inc.
Zora Crnojacki, Project Advisor, OEB

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. MHSTCI 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 MHSTCI 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 MHSTCI 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, MHSTCI 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*.



Stantec Consulting Ltd.
1-70 Southgate Drive, Guelph ON N1G 4P5

May 4, 2020
File: 160961351

Attention: Katherine Kirzati
Heritage Planner
Ministry of Heritage, Sport, Tourism and Culture Industries
401 Bay St, Suite 1700
Toronto, ON M7A 2R9
Katherin.kirzati@ontario.ca

Dear Ms. Kirzati,

Reference: Branchton Replacement Project Environmental Study Report (MHSTCI File No. 0007319)

Thank you for your comments received by email on April 7, 2020 regarding the Branchton Replacement Project Environmental Study Report. Please find responses to your comments below.

Comment #1

The report does not appear to contain a section that describes the existing conditions, as per the requirement of Chapter 2 of the Guidelines. Please explain why it has not been included or, preferably, please insert a section on the existing conditions.

As per the comments below for Appendix A, please amend the title accordingly.

Response

The existing conditions of the site can be found in Section 2 of the Environmental Study Report.

Comment #2

2.2.3 Archaeological Resources

This section notes that Stage 3 archaeological assessment, and potentially a Stage 4, will be required for a portion of the study area. Archaeological concerns have not been addressed until reports have been entered into the Ontario Public Register of Archaeological Reports where those reports recommended that:

- 1. The archaeological assessment of the project area is complete and*
- 2. All archaeological sites identified by the assessment are either of no further cultural heritage value or interest (as per Section 48(3)) of the Ontario Heritage Act) or that mitigation of impacts has been accomplished through an avoidance and protection strategy.*

Response

Enbridge agrees with the above statement.

May 4, 2020
Katherine Kirzati
Page 2 of 2

Reference: Branchton Replacement Project Environmental Study Report (MHSTCI File No. 0007319)

Comment #3

2.3.4 Cultural Heritage Resources

This section states that a cultural heritage assessment was conducted in 2007 and the report (Built Heritage and Cultural Landscape Assessment, South Boundary Transportation Corridor, Class Environmental Assessment, Regional Municipality of Waterloo, Ontario, Archaeological Services In., September 2007, revised April 2008) has been used for this project, as the study area for that project encompassed the current study area. The 2007 report was provided to MHSTCI under separate cover.

Section 2.3.1 notes that the 2007 report found a cultural heritage landscape south of the current study area. However, this cultural heritage resources has not been identified in this ESR. Please provide a municipal address or legal description so that its proximity to the current study area can be ascertained and cross-referenced with the 2007 assessment.

The current entry indicates that no impacts are anticipated, however it does not describe the potential impacts that may occur, nor does it provide a rationale for not requiring mitigation measures. Please amend this section accordingly.

Response

The cultural heritage landscape south of the current study area is located on Figure 4a of the 2007 report found under separate cover. As the landscape will not overlap with the project footprint, and as the project is below grade (based on the project description in Section 1.1 of the Environmental Study Report), there will be no impacts on the cultural heritage landscape.

Comment #4

Appendix A Environmental and Socio-Economic Features

The title of this appendix does not reflect its contents, which is a map of the study area. Please amend the title to "Study Area". This will tie-in with all entries in the body of the report that refer to Appendix A (e.g. Section 1.2 and Section 2.0).

Response

Comments regarding titles will be taken into consideration for such future reports.

Thank you for providing comments on the Branchton Replacement Project Environmental Study Report. Should you have any additional questions please do not hesitate to contact me.

Regards,

Stantec Consulting Ltd.



Mark Knight

Senior Associate, Environmental Planner
Phone: 519-585-7430
Mark.Knight@stantec.com

c. Norm Dumouchelle, Enbridge

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