

**Sent by email and filed electronically on RESS**

February 8, 2022

Christine Long  
Board Secretary and Registrar  
Ontario Energy Board  
27<sup>th</sup> Floor, 2300 Yonge Street  
Toronto, Ontario M4P 1E4

**Re: EB-2019-0007 – Imperial Oil Waterdown to Finch Project  
Change Request**

Dear Ms. Long:

On March 12, 2020, the Ontario Energy Board (“OEB” or the “Board”) granted Imperial Oil Limited (“Imperial”) leave to construct the Waterdown to Finch Project (the “Project”), subject to Conditions of Approval enclosed as Schedule B to the Leave to Construct Decision and Order (the “Order”).<sup>1</sup>

**Proposed Changes**

Further to the Order, Imperial requests that the OEB approve the following changes to Conditions 7(a) and 7(b) of the Order:

7. Both during and after construction, Imperial Oil shall monitor the impacts of construction, and shall file with the OEB one paper copy and one electronic (searchable PDF) version of each of the following reports:
- a) a post construction report, within ~~three~~ six months of the in-service date [...]
  - b) a final monitoring report, no later than ~~fifteen~~ eighteen months after the in-service

**Rationale for the Proposed Changes**

Installation of the pipeline will be complete in winter 2022 and commissioning of the pipeline is planned for spring 2022. However, seasonal and environmental constraints will prevent the completion of reclamation activities until summer 2022. As a result, reclamation activities will not be complete at the time of submission of the post-construction report required by condition 7(a). The post-construction report would, therefore, not include details of reclamation for portions of the right-of-way.

The proposed changes would allow for a full growing season between submission of the post-construction report and the final monitoring report required by condition 7(b). This additional time will be used for monitoring during the leaf-on season, which will allow for a complete and representative final monitoring report. The proposed changes will further allow time for identification of any reclamation deficiencies and resolution of these deficiencies prior to the submission of the final monitoring report, minimizing the potential for outstanding issues or concerns.

Imperial therefore requests that the proposed changes be approved without a hearing. Imperial submits that the proposed changes are necessary and will not materially change the Project’s impacts as

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<sup>1</sup> EB-2019-0007, Decision and Order, dated March 12, 2020.

assessed by the OEB during the Leave to Construct proceeding. Rather such changes will ensure that the post-construction report and final monitoring report are as fulsome and useful as possible for the Board.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Malone', written in a cursive style.

Jessie Malone  
Safety and Environment Lead

cc. Zahra Allidina, Imperial  
Zora Crnojacki, OEB  
Michael Millar, OEB