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February 13, 2025

**VIA EMAIL and RESS**

Nancy Marconi  
Registrar  
Ontario Energy Board  
2300 Yonge Street, Suite 2700  
Toronto, Ontario, M4P 1E4

Dear Nancy Marconi:

**Re: Enbridge Gas Inc. ("Enbridge Gas")  
Ontario Energy Board ("OEB") File No: EB-2023-0175  
Watford Pipeline Project ("Project")**

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On March 7, 2024, the OEB issued its Decision and Order for the above noted proceeding which included, as Schedule B, several Conditions of Approval.

Per Condition of Approval 8 (a) in the Decision and Order, Enbridge Gas is to provide the OEB with a post construction report within three months of the in-service date. Please find enclosed a copy of the post construction report for Watford Pipeline Project.

Please contact me if you have any questions.

Yours truly,

*Olatunbosun Ishola*

Olatunbosun Ishola  
Advisor, Regulatory Applications – Leave to Construct

# **Watford Pipeline Project Post Construction Report EB-2023-0175**

FINAL REPORT

February 12, 2025

Prepared for:  
Enbridge Gas Inc.  
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Prepared by:  
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Project/File:  
16095133



## Limitations and Sign-off

The conclusions in the Report titled Watford Pipeline Project Post Construction Report EB-2023-0175 are Stantec's professional opinion, as of the time of the Report, and concerning the scope described in the Report. The opinions in the document are based on conditions and information existing at the time the scope of work was conducted and do not take into account any subsequent changes. The Report relates solely to the specific project for which Stantec was retained and the stated purpose for which the Report was prepared. The Report is not to be used or relied on for any variation or extension of the project, or for any other project or purpose, and any unauthorized use or reliance is at the recipient's own risk.

Stantec has assumed all information received from Enbridge Gas Inc, (the "Client") will be provided to the Ontario Energy Board (OEB) by Enbridge Gas Inc. (Enbridge Gas) as part of the OEB Leave to Construct (LTC) approval requirements and third parties in the preparation of the Report to be correct. While Stantec has exercised a customary level of judgment or due diligence in the use of such information, Stantec assumes no responsibility for the consequences of any error or omission contained therein.

This Report is intended solely for use by the Client in accordance with Stantec's contract with the Client. While the Report may be provided to applicable authorities having jurisdiction and others for whom the Client is responsible, Stantec does not warrant the services to any third party. The report may not be relied upon by any other party without the express written consent of Stantec, which may be withheld at Stantec's discretion.

Prepared by: \_\_\_\_\_  
Signature

Brent Reeves, B.A. Hon., CISEC  
Environmental Scientist  
\_\_\_\_\_  
Printed Name and Title

Reviewed by: \_\_\_\_\_ Approved by: \_\_\_\_\_  
Signature Signature

Chris Revak, B.Sc., CISEC  
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Rooley Georgopoulos, B.Sc.  
Principal, Senior Project Manager  
\_\_\_\_\_  
Printed Name and Title



## Executive Summary

Enbridge Gas filed an application with the Ontario Energy Board (OEB) under section 90 of the Ontario Energy Board Act, 1998, S.O. 1998, c. 15, Schedule B for an order granting leave to construct of approximately 15.3km of Nominal Pipe Size (NPS) 6 inch Steel (ST) natural gas main to connect the Waste Management (WM) Twin Creeks Environmental Centre renewable natural gas facility located near the community of Watford in the Township of Warwick.. The OEB issued *Leave to Construct* (LTC) for the Project on March 7, 2024, subject to the *Conditions of Approval* (COA) contained in *Schedule B of the Decision* (EB-2023-0175).

As part of the LTC COA, Enbridge Gas is required to complete a *Post Construction Report* to be filed to the OEB within three months of the in-service date. As reported to the OEB, the Project's in-service date was November 15, 2024, making the filing date for the *Post Construction Report* to be February 15, 2025, as per condition 8. a) of *Schedule B - Decision and Order - Enbridge Gas Inc. - EB-2023-0175 - COA*. Enbridge Gas will file the *Final Monitoring Report* with the OEB by June 1, 2026, as per condition 8. b) of the *EB-2023-0175 Decision and Order*.

This *Post Construction Report* has been prepared in support of the *EB-2023-0175 Decision and Order* (OEB 2023), detailing the reporting requirements upon completion of the Project and the actual environmental conditions of the right-of-way (ROW) and associated facilities current to December 1, 2024. Additional information collected after December 1, 2024, will be included in the *Final Monitoring Report* to be filed with the OEB by June 1, 2026. The scope includes requirements outlined in the *EB-2023-0175 Decision and Order*.

There was ongoing consultation with regulatory authorities (i.e., St. Clair Region Conservation Authority, etc.), landowners, residents, and other stakeholders. There were no significant (material) changes or modifications to construction mitigations from the approved recommendations identified in the *Environmental Report* (ER) (Dillon:2023) filed with the OEB.

Many of the potential environmental effects outlined in the ER were avoided or reduced by locating the pipeline in the previously disturbed municipal road ROW, using horizontal directional drilling (HDD) methodologies, and installing the pipeline outside of sensitive timing windows for species potentially in the ROW whenever possible. Other potential environmental effects were further reduced by implementing appropriate feature specific mitigation measures and proactively stabilizing disturbed areas as soon as possible after construction.

Construction of the pipeline commenced on May 2, 2024 and achieved an in-service date of November 15, 2024. Restoration was proactive with temporary stabilization and clean-up occurring throughout construction. However, due to the time of year that the pipeline was installed, final restoration has been deferred until spring 2025.





Construction activities were carried out with consideration of the environment and the residents located adjacent to the construction area. Appropriate mitigation and monitoring measures were implemented during all phases of construction for the Project to assess and reduce potential impacts. Good communication practices and meetings were key to conveying an understanding of responsibilities and reducing the likelihood of adverse environmental effects.

Enbridge Gas was transparent with issues identified during construction, swiftly responded to complaints or issues as they were identified, reported issues to the appropriate regulatory authority as required and determined and implemented appropriate remedial measures to address each issue. At the time of writing, there were no outstanding complaints regarding the Project. Potential future issues would be reported and addressed in the *Final Monitoring Report* (June 2026).

Currently the ROW has been temporarily stabilized and scheduled to undergo final restoration in spring 2025. Monitoring will be conducted in spring/summer 2025 when the topsoil amendment and seeding is scheduled and in the summer 2025 to evaluate the success of 2025 spring restoration measures and address any deficiencies as required. A fall 2025 and a spring 2026 monitoring visit where additional photographs can be acquired may occur if necessary.

Provided that outstanding commitments identified in this report are addressed, no significant residual or cumulative effects on environmental and/or socio-economic features are anticipated from the construction of the Project.



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## Acronyms / Abbreviations

AA	Archaeological Assessment
CA	Conservation Authority
COA	Conditions of Approval
DFO	Department of Fisheries and Oceans Canada
ESC	Erosion and Sediment Control
EI	Environmental Inspector
Enbridge Gas	Enbridge Gas Inc.
EPP	Environmental Protection Plan
ER	Environmental Report
HDD	Horizontal Directional Drilling
IR	Inadvertent Release of Drilling Fluid
km	kilometers
LTC	Leave to Construct
MCM	Ministry of Citizenship and Multiculturalism
MECP	Ministry of the Environment, Conservation and Parks
m	metres
NPS	Nominal Pipe Size
OEB	Ontario Energy Board
SCRCA	St. Clair Region Conservation Authority
RNG	Renewable Natural Gas
ROW	Right-of-Way
SAR	Species At Risk
Stantec	Stantec Consulting Ltd.
WM	Waste Management



# 1 Introduction

Enbridge Gas Inc. (Enbridge Gas) filed an application with the Ontario Energy Board (OEB) under section 90 of the Ontario *Energy Board Act*, 1998, S.O. 1998, c. 15, Schedule B for an order granting leave to construct of approximately 15.3km of Nominal Pipe Size (NPS) 6 inch Steel (ST) natural gas main to connect to the Waste Management (WM) Twin Creeks Environmental Centre renewable natural gas facility located near the community of Watford in the Township of Warwick (the Project). The OEB issued *Leave to Construct* (LTC) for the Project on March 7, 2024, subject to *Conditions of Approval* (COA) contained in *Schedule B - Decision and Order* in the *EB-2023-0175* proceeding. See Appendix B for a map of the Project.

As part of the LTC COA, Enbridge Gas is required to complete a *Post Construction Report* to be filed with the OEB within three months of the in-service date and a *Final Monitoring Report* within 15 months of the in-service date, or on June 1 if the deadline falls between December 1 and May 31. As reported to the OEB, the Project's in-service date was November 15, 2024, making the filing date for the *Post Construction Report* February 15, 2025, as per condition 8. a) of *Schedule B - Decision and Order - Enbridge Gas Inc. - EB-2023-0175 - COA*. Enbridge Gas will file the *Final Monitoring Report* with the OEB by June 1, 2026, as per condition 8. b) of the *EB-2023-0175 Decision and Order*.

## 1.1 Scope

This *Post Construction Report* has been prepared in support of the *EB-2023-0175 Decision and Order* (OEB 2023), detailing the reporting requirements upon completion of the Project and the actual environmental conditions of the right-of-way (ROW) and associated facilities current to December 1, 2024. Additional information collected after December 1, 2024, will be included in the *Final Monitoring Report* to be filed with the OEB by June 1, 2026.

The scope includes requirements outlined in the *EB-2023-0175 Decision and Order*. Specifically, the scope of this *Post Construction Report* will include the following *EB-2023-0175 Decision and Order - COA*:

1. Enbridge Gas Inc. shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2023-0175 and these Conditions of Approval...
3. Enbridge Gas Inc. shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the project...
8. Both during and after construction, Enbridge Gas shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:
  - a) a post construction report, within three months of the in-service date, which shall:
    - i. provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 1;
    - ii. describe any impacts and outstanding concerns identified during construction;



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- iii. *describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction;*
  - iv. *include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions; and*
  - v. *provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project.*
- b) *a final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:*
- i. *provide a certification, by a senior executive of the company, of Enbridge Gas' adherence to Condition 4;*
  - ii. *describe the condition of any rehabilitated land;*
  - iii. *describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction;*
  - iv. *include the results of analyses and monitoring programs and any recommendations arising therefrom;*
  - v. *and include a log of all complaints received by Enbridge Gas, including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions."*

*The full Decision and Order can be found in Appendix E.*



## 2 The Project

### 2.1 Project Description

Enbridge Gas constructed approximately 15.3km of NPS 6-inch ST natural gas main to connect to the Waste Management (WM) Twin Creeks Environmental Centre renewable natural gas facility located near the community of Watford in the Township of Warwick. The pipeline is located primarily in the road allowance commencing at the existing Enbridge mainline block valve station at 3943 Hardy Creek Road in the Municipality of Brooke-Alvinston and continued north for 7.5 km, then turned west along Churchill Line for 750 meters (m), then turned north and entered the Township of Warwick, running along Arkona Road for 2.7 km. From there, the route turned west to run along Confederation Line for 3.1 km, then turned north and ran along a private property and private laneway to enter the Twin Creeks Environmental Centre at 5768 Navoo Road/8039 Zion Line.

#### 2.1.1 Schedule

Construction of the pipeline commenced on May 2, 2024 and had an in-service date of November 15, 2024. Restoration was proactive throughout construction with temporary stabilization and clean-up occurring throughout construction. However, due to the time of year that the pipeline was installed, final restoration of approximately 30% of the ROW (Hardy Creek Road, Arkona Road) was required to be deferred until spring 2025.

The *Environmental Report* (ER) (Dillon, 2023) developed in support of the Project, consultation, and the permitting process identified various timing restrictions for construction to avoid breeding and active periods for birds, turtles, fish, and bats. Enbridge Gas made all reasonable efforts to adhere to construction timing restrictions as well as implementing the appropriate mitigation measures when work was required within sensitive timing windows for nesting birds and turtles.

#### 2.1.2 Supporting Studies for the Project

In support of permitting requirements for the Project, Enbridge Gas coordinated the execution of field studies and the preparation of respective reports to file with the appropriate provincial regulators and to assist with the design, construction, and development of mitigation measures. Table 2.1 lists the reports that were generated for the Project and Table 2.2 lists permits/approvals received.



**Table 2.1 Studies Completed for the Project**

<b>Report Title</b>	<b>Author</b>	<b>Date</b>
<i>Cultural Heritage Screening Report</i>	TMHC	February 15, 2023
<i>Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment</i>	TMHC	February, 2024
<i>Construction Vibration Monitoring Record Memorandum</i>	Dillon Consulting	August 28, 2024
<i>Enbridge Gas Inc. Environmental Protection Plan</i>	Dillon Consulting	May, 2024
<i>Environmental Report</i>	Dillon Consulting	July 2023
<i>Stage 1 Archaeological Assessment P1189-0011-2022</i>	TMHC	February 16, 2023
<i>Stage 2 Archaeological Assessment P1189-0039-2023</i>	TMHC	August 9, 2024
<i>Stage 2 Archaeological Assessment P1189-0051-2024</i>	TMHC	July 4, 2024
<i>Stage 4 Avoidance and Protection</i>	TMHC	November 4, 2024
<i>Species At Risk Memorandum</i>	Dillon Consulting	September 28, 2023
<i>Water Taking and Discharge Plan</i>	Dillon Consulting	May 2024
<i>Assessment of Past Uses</i>	Dillon Consulting	April 24, 2022
<i>Sampling and Analysis Plan</i>	Dillon Consulting	June 25, 2024
<i>Soil Characterization Report</i>	Dillon Consulting	December 2024
<i>Excess Soils Destination Assessment Report</i>	Dillon Consulting	June 25, 2025
<i>Liquid Soils Procedure - Memorandum</i>	Dillon Consulting	July 11, 2024

**Table 2.2 Environmental Permits/Clearances for the Project**

<b>Approval</b>	<b>Issuing Agency</b>	<b>Date of Issue</b>	<b>Expiration Date</b>
Leave to Construct	OEB	March 7, 2024	N/A
Notice on Excess Soil Registry – Initial Declaration Filing	MECP	July 4, 2024	N/A
Notice on Excess Soil Registry – Final Declaration Filing	MECP	December 9, 2024	N/A
Review and Entry of Stage 1 Archaeological Assessment P1189-0011-2022	MCM	August 21, 2023	N/A
Review and Entry of Stage 2 Archaeological Assessment P1189-0039-2023	MCM	September 5, 2024	N/A
Review and Entry of Stage 2 Archaeological Assessment P1189-0051-2024	MCM	September 10, 2024	N/A
Review and Entry of Stage 4 Avoidance and Protection (P1189-0070-2024)	MCM	January 10, 2025	N/A



Approval	Issuing Agency	Date of Issue	Expiration Date
St. Clair Region Conservation Authority Permit #2023-0781	SCRCA	December 14, 2023	December 14, 2025
DFO and Enbridge Gas Inc. Agreement related to Watercourse Crossings for Pipeline Construction and Maintenance in Ontario	DFO	March 22, 2022	N/A

Notes:

MCM - Ministry of Citizenship and Multiculturalism

MECP – Ministry of Environment, Conservation and Parks

DFO – Department of Fisheries and Oceans

SCRCA – St. Clair Region Conservation Authority

N/A – Not applicable

## 2.2 Modifications to the Project

Pursuant to condition 6 of the COA contained in the *EB-2023-0175 Decision and Order*, Enbridge Gas shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. There were no changes to OEB-approved construction or restoration procedures during construction and restoration of the Project.

## 2.3 Environmental Protection Plan

A comprehensive Environmental Protection Plan (EPP) (Dillon 2024) was developed for the Project and was distributed in both hard and electronic copies to supervisory Project personnel including Enbridge Gas Site Inspectors, Environmental Inspectors (EIs) and Contractor Foremen. Environmental alignment sheets included in the EPP provided an environmental feature overview of each segment of the pipeline. The air photo-based mapping illustrated the location of key environmental and socio-economic features both in and adjacent to the pipeline alignment. The environmental alignment sheets also identified and described items such as Conservation Authority (CA) regulated areas, wetland and watercourse locations, construction timing windows, vegetation clearing windows, feature crossing method, species at risk (SAR) locations, and built cultural heritage properties and landscapes.

Pursuant to the OEB's Conditions of Approval, Enbridge Gas provided a draft copy of the EPP to Three Fires Group for comment prior to implementation.

The Project staff used the EPP in conjunction with the environmental permit conditions. If there were any variances between the EPP and permit conditions, Enbridge Gas supervisory staff and/or the EI flagged the variances and reviewed them with construction staff prior to initiation of construction at the site. Whenever there was overlap or variances between the commitments in the EPP, permits, or other Project documents, the most stringent commitment was adopted.





### **3 Executive Certification**

To address condition 8. (a (i) and (v) within the *EB-2023-0175 Decision and Order - COA*, Appendix A provides certification by a senior executive of Enbridge Gas regarding adherence to condition 1 of the COA and condition 3 of the COA that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate and maintain the Project (see Section 1.1).



## 4 Mitigation Measures and Compliance

To address condition 8(a)(iii) within the *EB-2023-0175 Decision and Order - COA*, the following section outlines the primary mitigation measures implemented during construction. These measures were implemented to reduce the potential for environmental and socio-economic effects from construction of the Project and to identify and rectify any deviations from the proposed mitigation measures initially identified in the ER. See Appendix C for photos of mitigation measures implemented throughout construction and the current conditions of the ROW.

### 4.1 Environmental Training

Prior to construction, training on the EPP and additional environmental permitting commitments was delivered by the EI to Project and contractor supervisory staff. Training occurred on May 28, 2024, and included a comprehensive review of regulatory requirements and CA permitting conditions; environmental alignment sheets; SAR commitments; important timing windows; cultural heritage monitoring requirements; archaeological considerations; watercourse and wetland crossing requirements; socioeconomic considerations; and contingency planning.

### 4.2 Environmental Inspection Program

Enbridge Gas contracted Stantec Consulting Ltd. (Stantec) to provide a trained EI that was a Certified Inspector of Sediment and Erosion Control. The EI conducted regularly scheduled inspections during construction as well as additional inspection during and after major weather events or when construction was occurring near sensitive environmental features as required.

The EI's main responsibilities were:

- Assist Enbridge Gas and the contractor in being compliant with environmental commitments, undertakings and conditions of environmental permits and approvals.
- Observe and document that mitigation and protection measures were being implemented and maintained to be effective.
- Communicate to workers and inspectors the environmental sensitivities and permit requirements for the site when the EI was not on-site.
- Observe and document that work was completed in accordance with applicable environmental regulations and Enbridge Gas policies, procedures, and specifications.
- Provide onsite monitoring of horizontal directional drilling (HDD) activities when necessary.

Environmental Inspection typically occurred on a weekly basis during construction to assist in confirming that construction staff adhered to environmental commitments during construction activities.



## **4.3 Pipeline and Facilities Construction**

Appropriate mitigation measures were established during construction for the Project to reduce the potential for impacts. On-going communication during construction between Enbridge Gas supervisory and inspection staff, the Contractor, and EI, was key to review proposed work, understand timing constraints and key mitigation requirements, responsibilities for Project workers, and to discuss opportunities for the reduction of potential adverse environmental effects.

Many of the potential environmental impacts were avoided by locating the Project in the previously disturbed municipal ROW and using HDD under sensitive features including wetlands and watercourses. Other potential adverse environmental effects were reduced by implementing appropriate mitigation measures and common management practices including observing construction timing windows and reducing potential interactions during sensitive breeding and active periods; implementing, inspecting, and maintaining erosion and sediment control (ESC) measures; and proactively reclaiming disturbed areas as soon as possible following construction.

### **4.3.1 Suspect/Contaminated Soils and Spills**

There were no suspect and/or contaminated soils observed during construction. Excess Soils were managed in accordance with O.Reg 406/19.

### **4.3.2 Wildlife**

#### **4.3.2.1 Migratory Birds**

As construction occurred in the migratory bird nesting restricted activity period (i.e., April 1 to August 31) in 2024, potential impacts to avian species were avoided during construction by conducting pre-construction nest sweeps within 48 hours and up to a maximum of 7 days prior to vegetation removal or clearing. As outlined in the approved EPP, when active nests were identified that could potentially be impacted, they were protected by flagging or fencing with an appropriate setback determined by the EI in consultation with a qualified biologist and as approved by the proponent.

#### **4.3.2.2 Turtles**

Wetlands and watercourse crossings were installed via HDD to reduce the potential for impacts to turtles and their habitat. Additionally, erosion and sediment control mitigation were established at 30 m setbacks from watercourses that acted as a physical barrier to deter movement.

#### **4.3.2.3 Species at Risk**

Project construction avoided sensitive SAR habitat by placing the pipeline in the previously disturbed municipal ROW and implementing HDD, which significantly reduced potential conflicts with SARs. Table 4.1 provides a list of potential SAR potentially impacted because of construction and the mitigation measures exercised to address potential impacts.



**Table 4.1 Species at Risk Mitigation Measures**

SAR	Timing Window and / or Regulatory Guidelines	Mitigation Measures
<i>Bats</i>	April 1 - September 30 (Roosting Season)	<ul style="list-style-type: none"> <li>No tree clearing/pruning was required for the Project.</li> <li>Construction occurred inside the active window (April 1 - September 30).</li> </ul>
<i>Bobolink and Eastern Meadowlark</i>	May 1 and July 31 (Breeding Season)	<ul style="list-style-type: none"> <li>The pipeline was installed in the road ROW, outside of potential habitat.</li> <li>Construction occurred inside of the regulatory timing window and required additional sweeps prior to construction</li> </ul>
<i>Blanding's Turtle</i>	April 1 – October 31	<ul style="list-style-type: none"> <li>HDD conducted under all watercourses.</li> <li>Site isolation to prevent accidental encounters</li> </ul>
<i>Eastern Foxsnake</i>	April 1 – October 31	<ul style="list-style-type: none"> <li>Wildlife sweeps prior to construction</li> <li>Daily inspection of machinery prior to start-up</li> </ul>

### 4.3.3 Aquatic Species and Watercourse/Wetland Crossings

The primary concerns regarding the potential effects of pipeline construction on fish and fish habitat are species viability and potential impacts during spawning/nursery activities. Both concerns were significantly reduced by using trenchless crossing techniques (HDD). Watercourse crossings were completed using trenchless technology (i.e., HDD) and were completed in conformance with the DFO and Enbridge Gas Inc. Agreement related to Watercourse Crossings for Pipeline Construction and Maintenance in Ontario. CA permits were obtained and reviewed prior to construction with applicable parties and were kept onsite for the duration of the Project. Watercourses were crossed as per the permit granted by SCRCA.

During construction, watercourses were not obstructed in a way that impeded the free movement of water or fish. Drilling equipment (e.g., drill rig, support equipment, sump) was set up a minimum of 30 m from watercourses. Vegetation clearing was limited to areas required for excavation and grading, and ESC measures were implemented to prevent off-site sediment migration into watercourses.

Neither the SCRCA nor DFO personnel inspected and/or monitored the regulated crossings during construction. However, the sites were inspected by the Stantec EI, Enbridge Gas Site Inspectors and the Contractor Foreman.

All wetlands that encroached into the municipal road ROW were crossed by HDD. No tie-in pits were located in wetlands. The entrance and exit pits were set back 30 m from the edge of the wetland where possible.



Tie-in backfilling and stabilization was progressive and implemented directly after the completion of the drilling. Environmental Inspection occurred regularly during the Project to assess the conditions of the environmental protection measures and recommend improvements, as appropriate, to prevent impacts to aquatic resources.

#### **4.3.3.1 Inadvertent Fluid Release Prevention, Monitoring and Emergency Response**

Potential effects during HDD include siltation and sedimentation during a surface release of drilling fluid or because of erosion and sediment transport during significant precipitation events. To reduce the risk of potential erosion and sedimentation from HDD activities and an inadvertent release of drilling fluid (IR), ESC mitigation measures were established at drilling sites. A potential IR to the environment was mitigated through the installation of protection measures prior to the onset of drilling and having the appropriate spill response materials (e.g., silt fence, straw bales, vacuum trucks, etc.) readily available during drilling. The potential for off-site sediment transfer was reduced by establishing silt socks at the HDD entrance and exit pits and limiting grading and overall disturbances where possible.

Prior to drilling, emergency response materials and heavy equipment (vacuum trucks/backhoes) as described in the ER and EPP were stationed onsite near the subject watercourses in an accessible location. During HDD, the Contractor continually monitored drilling fluid volumes and pressure conditions in the borehole and carried out regular ground surface inspections along and within 30 m of the drill path.

One inadvertent release of drilling fluid into a watercourse occurred on July 2<sup>th</sup>, 2024. The event was reported to the MECP's Spills Action Center and Indigenous communities, and remediation actions were undertaken in accordance with the project's response protocols. As a result, no adverse effects to fish or fish habitat were observed. A site-visit was conducted by the MECP and follow up from an MECP Regional Officer was completed on July 17, 2024 to confirm that all remedial actions had been completed.

#### **4.3.4 Archaeology**

The archaeological work for the Project was completed in accordance with the MCM 2011 *Standards and Guidelines for Consultant Archaeologists*. The Stage 1 archaeological assessment (AA) of the study area for the Project, involved background research and property inspection which determined that two (2) "Archaeological Zones" were located within 50 m of the initial pipeline route and that these zones were to be avoided by redesigning the Project to an alternative route and temporary barriers to be erected to avoid encroaching on these sensitive resources. The Stage 1 AA also determined that as most of the remaining route was located on previously disturbed road allowances that there was low to no archaeological potential due to this extensive disturbance.

Stage 4 avoidance and protection measures were implemented and as a result, no disturbances to either archaeological zone occurred during construction. Archaeological work for the Project was documented in a series of AA reports and submitted to the MCM for review and inclusion in the *Ontario Public Register of Archaeological Reports*.



Supervisory staff were trained during the Environmental Training (Section 4.1) on contingency plans in the event of the discovery of potential heritage resources (artifacts). Potential heritage resource discoveries would be addressed using the Heritage Resource Discovery Contingency Plan included in the EPP as required. Nothing was discovered during the construction phase of the Project.

#### **4.4 Local By-Law Issues and Non-Compliances**

During construction, Enbridge Gas did not record any by-law issues. Frequent contact was maintained with the local municipalities as a best practice. Sensitive and regulated areas were clearly marked in the field and appropriate training (EPP and environmental alignment sheets) was provided to the Contractor and field inspectors. No non-compliances with the EPP or environmental permits occurred during the construction phase of the Project.



## 5 Impacts and Outstanding Concerns

To address condition 8(a)(ii) within the *EB-2023-0175 Decision and Order - COA*, the following section outlines the impacts and outstanding concerns related to the Project. Many of the potential environmental impacts outlined in the ER were avoided by locating the Project in the previously disturbed municipal ROW and using HDD under sensitive features including wetlands and watercourses. Mitigation measures in the EPP were implemented when required to reduce impacts to the environment. Additional information regarding mitigation measures used to prevent potential impacts of construction are detailed in Section 4 above.

Temporary restoration of the site was progressive throughout construction (see Appendix C for photos). Once installation was completed, the site was re-graded as soon as practical to match pre-existing conditions, topsoil was reinstated where appropriate and seeded with an appropriate stabilizing seed mix.

Since construction was completed by both HDD and open trenching techniques, potential areas of settlement may occur and but are expected to be confined to tie-in pits and areas where trenching occurred. Settlement will be assessed in 2025 and observations of significant settlement along the ROW may require additional restoration in 2025.

Entry and exit pits were set back a minimum of 30 m from watercourses, wetlands, and other sensitive features where possible. There were no stability concerns or sedimentation risks observed at either wetlands or watercourses along the ROW.

Currently the ROW has been temporarily stabilized and scheduled to undergo final restoration in spring 2025. Approximately 30% of the ROW (isolated locations associated with Hardy Creek Road and Arkona Rd.) was identified where active settling and poor germination of hydroseed was still ongoing during December of 2024. Monitoring will be conducted in spring/summer 2025 when the topsoil amendment and additional seeding is scheduled and in fall 2025 to evaluate the success of 2025 restoration measures and address any deficiencies as required. A spring 2026 monitoring site visit may occur if necessary.



## 6 Stakeholder Relations and Complaint Management

To address condition 8 (a)(iv) within the *EB-2023-0175 Decision and Order - COA* for the Project, the following section includes:

- the complaint tracking, management, and resolution process,
- date/time the complaint was received,
- a description of the complaint,
- any actions taken to address the complaint, and
- the rationale for taking such actions.

Design and construction scheduling were made available throughout construction to interested parties, as necessary.

Agencies and stakeholders that Enbridge Gas continued to work closely with included local municipalities and counties, Indigenous communities, and SCRCA. Enbridge Gas also coordinated closely with utility companies and adjacent landowners on various aspects of the Project.

### 6.1 Recording and Response Process

If a complaint was received, Enbridge Gas was to record and track the activities leading to the resolution of the complaint. The process involved recording the correspondence between the complainant and Enbridge Gas as efforts were made to reach a resolution. Correspondence could include phone calls, on-site visits, emails and in-person meetings. Actions to reach a resolution are to be tracked and followed up by Enbridge Gas to confirm resolution.

### 6.2 Summary of Complaints

Enbridge Gas maintained a Complaints and Resolutions Log for the duration of the construction period for the Project. The log was used to track complaints received and the correspondence and actions executed to resolve the complaints. As of December 2024, there were no issues or complaints identified or tracked by Enbridge. Appendix D provides a copy of the log. This log is a living document in which content is added as complaints, actions and resolutions are managed.

Complaints/questions were addressed as quickly as possible. As of February 14, 2025, there are no unresolved complaints/questions.





## 7 Outstanding Commitments

### 7.1 Restoration

Interim restoration was ongoing throughout construction; however, the running line still requires some supplemental restoration (topsoil amendments and seeding) in spring 2025 to stabilize the ROW where surface disturbance and further settling has occurred. Appropriate seed mix(es) will be selected and used based on landowner requirements and surrounding land use and vegetative communities. Disturbed areas will also be stabilized with the use of ESC measures (i.e., hydro-mulch, straw, or erosion control blankets) to limit the potential for erosion and/or check dams to limit the potential for off-site sedimentation during heavy precipitation events while vegetation establishes and stabilizes the ROW.

Restoration will be monitored in 2025 and 2026 if necessary. Seeding amendments, if required, will be scheduled in spring 2025.

### 7.2 Monitoring Programs

To comply with permit conditions and condition 8(b) within the *EB-2023-0175 Decision and Order - COA* for the Project, Enbridge Gas will file a *Final Monitoring Report* with the OEB by June 1, 2026, which will include results of monitoring programs and monitoring site visit(s) in 2025 and 2026 (if required) to inspect the conditions of the ROW.



## 8 References

Dillon Consulting. Enbridge Gas Inc. Environmental Protection Plan – Watford Pipeline Project (May 2024, Rev. B-22-4780

Enbridge. 2021. Horizontal Directional Drilling Contingency Plan (Document ID: GD-22-7435-5F9C). Published by Enbridge Gas Inc. Version 1.0. Effective 2022-03-31.

Enbridge. 2022. Construction and Maintenance Manual (V2022.1). Published by Enbridge Gas Inc. Effective 2022-09-28.

Fisheries and Oceans Canada (DFO). 2022. DFO and Enbridge Gas Inc. Agreement Related to Watercourse Crossings for Pipeline Construction and Maintenance in Ontario. Agreement between DFO and Enbridge Gas Inc. March 2022.

Ontario Energy Board (OEB). 2023. Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario 8th Edition.

OEB. 2024. Decision and Order EB-2023-0175 Enbridge Gas Inc. Application for leave to construct natural gas pipeline and associated facilities in the Municipality of Brooke-Alvinston and the Township of Warwick and for a new Certificate of Public Convenience and Necessity for the Township of Warwick. March 7, 2024.

St. Clair Region Conservation Authority (SCRCA). 2023. Ontario Regulation 171/06 – Development, Interference with Wetlands and Alterations to Shorelines and Watercourses. Permit Number 2023-0781. December 14, 2023.



# **Appendices**



## **Appendix A      Executive Certification**





**Leave to Construct Application under Section 90 of the OEB Act**

**Enbridge Gas Inc.**

**EB-2023-0175**

**Conditions of Approval**

**March 7, 2024**

I hereby certify that Enbridge Gas Inc. has constructed the facilities and restored the land in accordance with the OEB's Decision and Order in EB-2023-0175 and the Conditions of Approval, as per Condition 8 (a)(i).

February 11, 2025

Date

A handwritten signature in black ink, appearing to read 'Mark Maxwell', written over a horizontal line.

Mark Maxwell,

Director, Operations Capital Programs

Enbridge Gas Inc.

Condition 8 (a)(i).

8. Both during and after construction, Enbridge Gas Inc. shall monitor the impacts of construction, and shall file with the OEB an electronic copy (searchable PDF) version of each of the following reports:
  - a) A post construction report, within three months of the in-service date, which shall:
    - i. provide a certification, by a senior executive of the company, of Enbridge Gas Inc.'s adherence to Condition 1.

Condition 1

Enbridge Gas Inc. shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2023-0175 and these Conditions of Approval.



**Leave to Construct Application under Section 90 of the OEB Act**

**Enbridge Gas Inc.**

**EB-2023-0175**

**Conditions of Approval**

**March 7, 2024**

I hereby certify that Enbridge Gas Inc. has obtained all other approvals, permits, licences, and certificates required to construct, operate, and maintain the proposed project in accordance with the OEB's Decision and Order in EB-2023-0175, Schedule B, Condition 8 (a)(v).

February 11, 2025

Date

A handwritten signature in black ink, appearing to read 'Mark Maxwell', written over a horizontal line.

Mark Maxwell,

Director, Operations Capital Programs

Enbridge Gas Inc.

Condition 8 (a)(v).

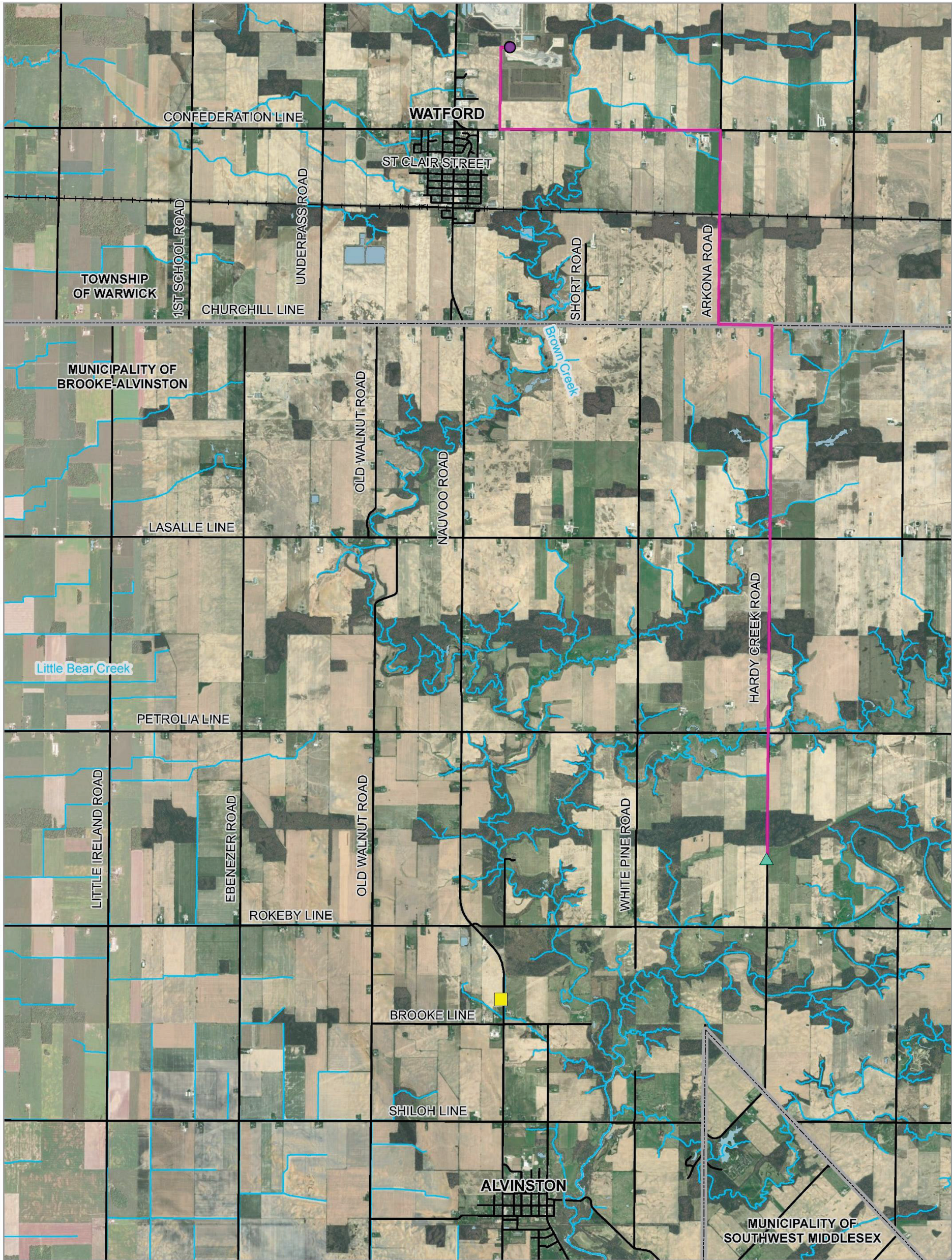
8. Both during and after construction, Enbridge Gas Inc. shall monitor the impacts of construction, and shall file with the OEB an electronic copy (searchable PDF) version of each of the following reports:
  - a) A post construction report, within three months of the in-service date, which shall:
    - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licences, and certificates required to construct, operate, and maintain the proposed project.


## **Appendix B      Figure 5-1: Preferred Route, Provided by Enbridge c/o Dillon Consulting**





Figure 5-1: Preferred Route





**ENBRIDGE GAS INC.**


Watford Pipeline Project

**PREFERRED ROUTE**

FIGURE 5-1

- Preferred Route
- Proposed Injection Station
- Watford Transmission Station
- Brooke Valve Site

- Rail
- Roads
- Watercourse
- Waterbody
- Municipal Boundary




MAP DRAWING INFORMATION:  
DATA PROVIDED BY MNR

MAP CREATED BY: -ZJB  
MAP CHECKED BY: -CP  
MAP PROJECTION: NAD 1983 CSRS UTM Zone 17N

SCALE 1:50,000

0 500 1,000 2,000 m



PROJECT: 22-4780 STATUS: DRAFT DATE: 2023-04-12

FILE LOCATION: K:\2022\224780\Product\Client\Watford Pipeline\Project\F5\_1\_PREFERREDRoute.mxd



## **Appendix C      Photo Logs**







**Photo 1** Hardy Creek (West) under normal flow conditions. HDD undertaken at this location.



**Photo 3** Kildeer nest identified during pre-construction nest sweeps.



**Photo 5** Standard ESC measures implemented to isolate stockpile prior to backfilling of trench.



**Photo 2** Pre-emptive bird sweeps under Hardy Creek bridge structure. No nests were observed.



**Photo 4** Pre-emptive setbacks established around Kildeer nest on west side of Hardy Creek Rd.



**Photo 6** Typical installation of sediment socks to isolate restored shoulder of road after restoration of the ROW.





**Photo 7** Utilization of sediment bag during dewatering activities after rain event.



**Photo 8** Installation of sediment fencing (with sediment sock) to isolate restored shoulder of Arkona Rd. after work had been completed.



**Photo 9** Preemptive installation of sediment sock on the south side of Hardy Creek at 30-m setback.



**Photo 10** Open cut trenching leading towards Twin Creeks Environmental Centre.



**Photo 11** Installation of sediment sock to isolate recent restorative measures.



**Photo 12** Installation of sediment fencing and sediment sock prior to construction of dewatering basin.





**Photo 133** Restored connection at Confederation Rd. and Arkona Rd.



**Photo 14** Temporary placement of sediment sock for use as a checkdam while hydroseeding is completed.



**Photo 15** Crowning of subsoil to address with future settling.



**Photo 16** Monitoring pits isolated awaiting backfilling on Confederation Line.



**Photo 17** Topsoil stripping and soil isolation at Enbridge Gas mainline block valve station.



**Photo 18** Restorative measures ongoing on Confederation Line.





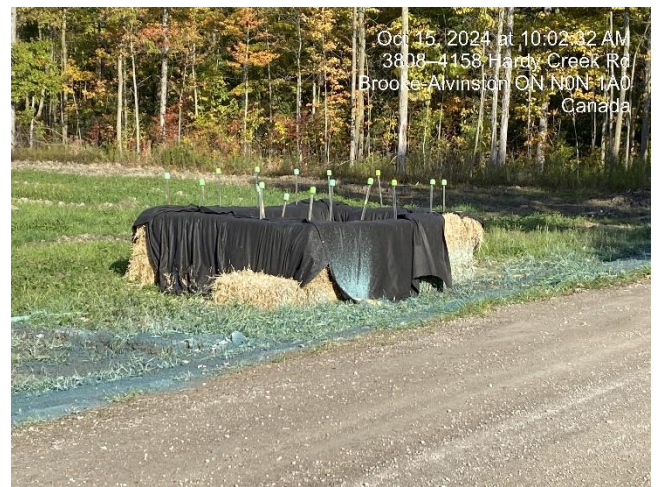
**Photo 19** Topsoil placement and final grading at corner of Confederation Line and Arkona Rd.



**Photo 20** Shoulder of road where hydroseeding had been applied. Additional monitoring for germination may be required in 2025.



**Photo 21** Prepping of shoulder in advance of topsoil placement and hydroseeding.



**Photo 22** Dewatering basin constructed in advance to hydrostatic testing discharge.



**Photo 23** Restored corner of Arkona Rd. with topsoil and hydroseeding applied.



**Photo 24** Settling observed along specific locations within ROW. Additional monitoring will be required in spring of 2025.





**Photo 25** East side road shoulder on Arkona Rd. requiring additional hydroseeding and will be addressed in spring of 2025.



**Photo 146** East side shoulder of Hardy Creek Rd. Additional hydroseeding may be required in spring of 2025.



**Photo 27** Completion of gravel pad and security fencing at Enbridge Gas mainline block station.



**Photo 28** Minimal germination evident on shoulder of road. Recent settling may require additional topsoil and seeding in the spring 2025.



**Photo 29** Recent topsoil placement at northern end of ROW.



**Photo 30** Road shoulder remains soft with possible settling still evident. Issue will be monitored in spring 2025.





**Photo 31** Additional topsoil required. Issue will be monitored and addressed in spring 2025.



**Photo 32** Completed and stabilized roadside ditch.



**Photo 33** Germination along roadside shoulder evident.



**Photo 34** Northwest side of Arkona with stabilized shoulder with germination evident.



**Photo 35** Minimal germination observed on shoulder of road. Additional application may be required in spring 2025.



**Photo 36** Minimal germination observed on shoulder of road. Additional application may be required in spring 2025.

## **Appendix D      Complaint and Resolutions Log**





## Complaint and Resolutions Log

ID	Date and Time Received	Description of Complaint	Actions Taken to Address the Complaint, the Rationale for Taking Such Actions	Status
1				
2				
3				
4				
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6				
7				
8				
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10				
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21				
22				
23				



## **Appendix E                      Schedule A Decision and Order EB-2023-0175**





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# DECISION AND ORDER

**EB-2023-0175**

**ENBRIDGE GAS INC.**

**Application for leave to construct natural gas pipeline and associated facilities in the Municipality of Brooke-Alvinston and the Township of Warwick and for a new Certificate of Public Convenience and Necessity for the Township of Warwick**

**BEFORE: Patrick Moran**  
Presiding Commissioner

**Anthony Zlahtic**  
Commissioner

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**March 7, 2024**

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# 1 OVERVIEW

On August 1, 2023, Enbridge Gas Inc. (Enbridge Gas) applied to the Ontario Energy Board (OEB), under section 90 of the *Ontario Energy Board Act, 1998*, S.O. 1998, c. 15, (Schedule B) (OEB Act), for an order granting leave to construct approximately 15.3 kilometres of natural gas pipeline and associated facilities in the Township of Warwick and the Municipality of Brooke-Alvinston (the Project). Enbridge Gas also applied under section 97 of the OEB Act for approval of the form of easement agreement and temporary land use agreement it offers to landowners for the routing and construction of the proposed pipeline.

The Project will connect Waste Management of Canada Corporation's (Waste Management) planned Twin Creeks Environmental Centre Renewable Natural Gas (RNG) facility to Enbridge Gas's network. In addition, Enbridge Gas plans to construct an RNG injection station. The general location of the Project is shown on the map in Schedule A to this Decision and Order.

Enbridge Gas also applied for approval under section 8 of the *Municipal Franchises Act* for a new certificate of public convenience and necessity for the Township of Warwick.

The OEB grants leave to construct the Project subject to the conditions of approval contained in Schedule B of this Decision and Order. The capital cost of the Project will be paid by the connecting customer, Waste Management, at no risk to other ratepayers. The OEB also approves the forms of easement agreement and temporary land use agreements proposed by Enbridge Gas.

The OEB also finds that it is in the public interest to approve Enbridge Gas's application for a new certificate of public convenience and necessity for the Township of Warwick.

## 2 PROCESS

The OEB held a written hearing to consider this application. A Notice of Hearing was issued on September 7, 2023. Pollution Probe and Three Fires Group Inc. (Three Fires Group) applied for and were granted intervenor status and cost eligibility.

On October 4, 2023, the OEB issued Procedural Order No. 1 setting the timeline for the proceeding. In accordance with the procedural schedule, written interrogatories by OEB staff, Pollution Probe and Three Fires Group were filed by October 31, 2023. Enbridge Gas responded to interrogatories on November 16, 2023.

OEB staff, Pollution Probe and Three Fires Group filed written submissions on November 30, 2023. Enbridge Gas filed a written reply submission on December 14, 2023.

### 3 REQUEST FOR LEAVE TO CONSTRUCT

Consistent with the [OEB's Standard Issues List](#) for natural gas leave to construct applications, the decision is structured to address the following issues:

1. Project Need
2. Project Alternatives
3. Project Cost and Economics
4. Environmental Impacts
5. Land Matters
6. Indigenous Consultation
7. Conditions of Approval

#### 3.1 Project Need

Waste Management plans to construct and operate RNG facilities at the Twin Creeks Environmental Centre and requested that Enbridge Gas construct new pipeline facilities to facilitate the injection of RNG supply volumes produced at the facility. There are currently no existing Enbridge Gas pipelines in the immediate vicinity of the Twin Creeks Environmental Centre. The nearest pipelines are designed at pressures of 420 kPag and 3,450 kPag and cannot accommodate the injection of the volume of RNG requested by Waste Management. The Project will connect Waste Management's planned RNG facility at the Twin Creeks Environmental Centre to Enbridge Gas's existing natural gas system. Enbridge Gas stated that the project is designed to meet the needs of Waste Management and is not dependent on any future or previously filed leave to construct applications.

The Project need is underpinned by the service contract executed between Enbridge Gas and Waste Management, effective April 19, 2023. The contract includes a provision for a monthly surcharge to be paid by Waste Management for the term of the contract.

OEB staff submitted that the Project is designed to meet the needs of Waste Management and is supported by the service contract between Waste Management and Enbridge Gas.

#### Findings

The OEB finds that Enbridge Gas has adequately demonstrated a need to construct new pipeline facilities to accommodate Waste Management's planned RNG facility. The

Project will facilitate the injection of RNG supply into Enbridge Gas's existing local distribution system to meet the transportation requirements of Waste Management.

### 3.2 Project Alternatives

Enbridge Gas stated that it applied the Integrated Resource Planning (IRP) Binary Screening Criteria and determined that the Project meets the definition of a Customer-Specific Build, as defined in the IRP Framework:

**Customer-Specific Builds** – If an identified system need has been underpinned by a specific customer's (or group of customers') clear request for a facility project and either the choice to pay a Contribution in Aid of Construction (CIAC) or to contract for long-term firm services delivered by such facilities, then an IRP evaluation is not required.<sup>1</sup>

The Project is driven solely by Waste Management's request to connect to Enbridge Gas's distribution system.

Enbridge Gas stated that the only existing system in the area that can facilitate the RNG injection volumes requested by Waste Management is 15.3 km away from the Twin Creeks Environmental Centre and that there are no other feasible facility alternatives to meet Waste Management's need. Enbridge Gas explained that the nearest pipelines are designed at pressures ranging from 420 kPag to 3,450 kPag and cannot accommodate the volume of RNG requested by Waste Management. Enbridge Gas also explained that the proposed 6-inch nominal pipeline size (NPS) is required for Waste Management to have unimpeded access to their maximum flow rate of 7,661 m<sup>3</sup>/hr.<sup>2</sup>

Enbridge Gas stated that it considered a number of potential routes for the Project. However, the proposed route is the preferred route from an environmental, socio-economic and technical perspective. The Environmental Report<sup>3</sup> noted that the preferred route passes the fewest businesses and residences; is in proximity to the fewest ecological land communities and potential significant wildlife habitats; and is not within 125 metres of a heritage property or adjacent to a burial site/cemetery.

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<sup>1</sup> [EB-2020-0091](#), Decision and Order, July 22, 2021, Appendix A

<sup>2</sup> Enbridge Gas Reply Submission, page 11, paragraph 24

<sup>3</sup> Application and Evidence, Exhibit F, Tab 1, Schedule 1, Attachment 1



OEB staff submitted that the Project is the best alternative to meet the stated need and that the proposed route is acceptable.

Three Fires Group submitted that there needs to be broader understanding of what constitutes the public interest in leave to construct applications and that newer actors should be afforded the opportunity to understand their full range of options in terms of locations and available alternative service providers. Three Fires Group requested that the OEB's decision note that project proponents should consider evidence relating to the public interest in the broader sense including evidence relating to the alternatives that the underlying energy producer had available to it.

In its reply submission, Enbridge Gas stated that Waste Management's need is best addressed by the proposed Project and that it adequately addressed all viable alternatives.

## Findings

The OEB finds that Enbridge Gas has undertaken an appropriate review of alternatives and potential routes for the Project and finds that the proposed route is the preferred route from an environmental and socio-economic perspective.

## 3.3 Project Cost and Economics

Enbridge Gas estimated the total cost of the Project to be \$20.4 million. The itemized estimate of the Project costs is set out in Table 1 below.

**Table 1: Estimated Project Costs (\$)**

Item No.	Description	Pipeline Costs	Ancillary Costs	Total Costs
1	Material Costs	3,512,922	970,000	4,482,922
2	Labour Costs	5,804,428	849,548	6,653,977
3	External Permitting & Land	332,000	10,000	342,000
4	Outside Services	2,483,617	1,077,927	3,561,543
5	Direct Overheads	517,007	163,002	680,009
6	Contingency Costs	3,288,993	798,324	4,087,317
7	Direct Capital Costs	15,938,967	3,868,800	19,807,768
8	Indirect Overheads	-	-	-
9	Interest During Construction	435,937	127,537	563,474
10	Total Project Costs	16,374,904	3,996,337	20,371,242

Enbridge Gas included a 24% contingency applied to all direct capital costs and stated that the contingency amount is consistent with similar projects approved by the OEB.

Enbridge Gas and Waste Management have executed a long-term M13 service contract for the Project. The contract includes a monthly service charge of \$166,146 to be paid by Waste Management. The contract also has a provision for the true-up of the monthly service charge based on actual costs.

Enbridge Gas stated that the Project will result in incremental annual operation & maintenance (O&M) costs.

In response to an OEB staff interrogatory, Enbridge Gas confirmed that the monthly service charge will be recalculated in a manner that ensures that the total final actual project costs will be recovered from Waste Management. Enbridge Gas also confirmed that Waste Management's contractual obligations ensure that regardless of the duration of the operation of the RNG facility, the total actual Project cost will be recovered from Waste Management.<sup>4</sup>

In its submission, OEB staff accepted the evidence filed by Enbridge Gas and the interrogatory response confirming that the Project costs will be fully paid by Waste Management and not borne by other ratepayers. OEB staff recommended a condition of approval that requires Enbridge Gas to confirm that the actual Project final costs are fully funded by Waste Management and not by ratepayers.

Pollution Probe submitted that there is additional risk associated with the collection of funds for this project in comparison to a similar RNG project given that Waste Management is being allowed by Enbridge to pay a monthly fee instead of a lump sum Contribution in Aid of Construction (CIAC). Pollution Probe also submitted that Enbridge Gas is proposing service rate changes impacting RNG injection services as part of its 2024 rebasing application<sup>5</sup> and it is unclear if the changes will have an impact on Waste Management or its contract. Pollution Probe recommended that the OEB approve the Project given that Waste Management has agreed to pay the capital costs and will pay the related annual O&M costs.

In its reply submission, Enbridge Gas submitted that any rate matters (including changes to M13 rates and charges) as well as the capital expenditure forecast proposed in the 2024 rebasing application exceed the scope of this proceeding and are more appropriately addressed as part of the rebasing proceeding. Enbridge Gas also submitted that the evidence demonstrates that the Project costs are reasonable and

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<sup>4</sup> Enbridge Gas Response to OEB Staff 4-b)

<sup>5</sup> EB-2022-0200

that the Project is economically feasible as it is fully funded by Waste Management and will not result in additional costs borne by existing ratepayers.

## Findings

The OEB finds that, as all actual Project costs will be recovered from Waste Management through the monthly CIAC surcharge and on-going costs will be recovered by Enbridge Gas through its M13 contract with Waste Management, there will be no impact to other ratepayers. The OEB accepts that the Project costs are reasonable in the circumstances of this proceeding, including the fact that Waste Management did not dispute the costs it will bear. The risk of cost recovery is a matter between Enbridge Gas and Waste Management, and it will not be open to Enbridge Gas to seek recovery of any aspect of the capital cost of this Project from other ratepayers.

### 3.4 Environmental Impacts

Dillion Consulting Ltd. (Dillon) was retained by Enbridge Gas to undertake an environmental and cumulative effects assessment (Study) for the Project, to select the preferred route. The results of the Study are documented in the Environmental Report included in the application. The Environmental Report includes input from the consultation program that was implemented for the Project.

The Environmental Report was circulated to members of the Ontario Pipeline Coordinating Committee (OPCC), Lambton County, the St. Clair Region Conservation Authority, the Brooke-Alvinston Council and the Township of Warwick. Enbridge Gas filed an update to the comments received on the Environmental Report in its response to OEB staff interrogatories.<sup>6</sup>

A Stage 1 Archeological Assessment of the study area was completed. Enbridge Gas stated that it expects to have a Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment and Stage 2 Archeological Assessment completed and reviewed by the Ministry of Culture and Multiculturalism prior to the commencement of Project construction.

Enbridge Gas stated that it will develop an Environmental Protection Plan that incorporates all of the recommended mitigation measures in the Environmental Report and any mitigation measures obtained by agency consultation.

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<sup>6</sup> Enbridge Gas Response to OEB Staff 5a)- g)

In its response to OEB staff interrogatories, Enbridge Gas provided an update on the status and expected timing for all permits and approvals and stated that there are no foreseeable delays.<sup>7</sup> Enbridge Gas stated that using the mitigation measures found in the Environmental Report, Environmental Protection Plan and additional mitigation measures provided by the regulatory agencies through the permitting and approval process (if received), no significant effects from the construction and operation of the Project are anticipated.

OEB staff submitted that Enbridge Gas completed the Environmental Report in accordance with the OEB's [Environmental Guidelines for the Location, Construction and Operation of Hydrocarbon Pipelines and Facilities in Ontario](#) (Environmental Guidelines). OEB staff had no concerns with the environmental aspects of the Project, based on Enbridge Gas's commitment to implement the mitigation measures set out in the Environmental Report and to complete the Environmental Protection Plan prior to the start of construction. OEB staff noted that the proposed conditions of approval require Enbridge Gas to obtain all necessary approvals, permits, licences, and certificates needed to construct, operate and maintain the Project and ensure that impacts of pipeline construction are mitigated and monitored.

Three Fires Group submitted that there are deficiencies in Enbridge Gas's approach to mitigating environmental impacts from the Project and outlined specific concerns relating to: suspect soils; groundwater; aquatic habitats; wildlife and wildlife habitats; ongoing monitoring of fugitive emissions and species at risk; miscellaneous notifications and protection; and site restoration. Three Fires Group requested relief from the OEB in respect to any orders approving the application (e.g., requirement for Enbridge Gas to supplement several of its environmental protection activities with additional commitments, measures and/or monitoring, etc.).

In its reply submission, Enbridge Gas submitted that the mitigation measures it has identified and committed to were informed by Indigenous consultation. Enbridge also submitted that the mitigation measures address the type of concerns identified in Three Fires Group's submission. Enbridge Gas submitted that the request by Three Fires Group for relief pertaining to additional mitigation measures, plans for monitoring and testing and reporting are not required given the mitigation measures already identified and the applicable regulatory and permitting requirements for the Project. Enbridge Gas further submitted that there is no need for additional formal comment processes to be completed prior to implementation of necessary plans and procedures given the consultation on the Project to date, the commitment of Enbridge Gas to ongoing

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<sup>7</sup> Enbridge Gas Response to OEB Staff 5-g)

consultation on the Project throughout the Project lifecycle and the appropriateness of the mitigation measures proposed and committed to by Enbridge Gas.

## Findings

The OEB finds that Enbridge Gas has completed the Environmental Report in accordance with the OEB's Environmental Guidelines. The OEB further finds that Enbridge Gas's commitment to implement the mitigation measures set out in the Environmental Report and its commitment to complete an Environmental Protection Plan prior to the start of construction provide sufficient measures to ensure that any adverse impacts from pipeline construction will be mitigated and monitored.

### 3.5 Land Matters

Enbridge Gas stated that the majority of the Project route will be located in the public road allowance. Temporary working areas will be required where the road allowance is too narrow or confined to facilitate construction. Enbridge Gas also stated that permanent easement will be required for the project.

Enbridge Gas filed forms of temporary land use<sup>8</sup> and permanent easement<sup>9</sup> agreements. The same forms of easement were approved by the OEB in a prior proceeding for the Ridge Landfill project.<sup>10</sup>

In response to OEB staff interrogatories, Enbridge Gas stated that it has initiated negotiations with landowners where easement is required. Enbridge Gas stated that if there are delays it may consider alternative plans for construction using available road allowance to prevent impacts to the in-service date.<sup>11</sup>

OEB staff submitted that the OEB should approve the proposed forms of easement and temporary land use agreements as both were previously approved by the OEB.

## Findings

The OEB approves the proposed forms of permanent easement and temporary land use agreements. Both forms have been previously approved by the OEB. The OEB requires that, in accordance with the standard conditions, Enbridge Gas will obtain all

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<sup>8</sup> Application and Evidence, Exhibit G, Tab 1, Schedule 1, Attachment 2

<sup>9</sup> Application and Evidence, Exhibit G, Tab 1, Schedule 1, Attachment 3

<sup>10</sup> [EB-2022-0203](#)

<sup>11</sup> Enbridge Gas Response to OEB Staff 7c) and 7d)

approvals, permits, licences and certificates required to construct, operate and maintain the project.

### 3.6 Indigenous Consultation

In the Delegation Letter<sup>12</sup>, the Ministry of Energy (MOE) identified the following Indigenous communities that Enbridge Gas should consult in relation to the Project:

- Aamjiwnaang First Nation (AFN)
- Bkejwanong (Walpole Island First Nation) (WIFN)
- Chippewas of Kettle and Stony Point First Nation (CKSPFN)
- Chippewas of the Thames First Nation (COTTFN)
- Oneida Nation of the Thames (Oneida Nation)

Direct notice of the application was provided to the five Indigenous communities listed above.

Three Fires Group, an Indigenous business corporation that represents CKSPFN, is an intervenor in the proceeding. In its intervention request, Three Fires Group stated that the traditional territory of, and associated rights and interests of, the First Nations it represents may be impacted by the outcomes of this proceeding.

Pursuant to the Environmental Guidelines, Enbridge Gas filed an Indigenous Consultation Report with its application describing the consultation activities it had undertaken and a description of what, if any, accommodation is proposed with respect to the Project.<sup>13</sup> In a response to OEB staff interrogatories, Enbridge Gas filed an updated Indigenous consultation log.<sup>14</sup>

Three Fires Group submitted that there are significant shortcomings in Enbridge Gas's application regarding Indigenous consultation, which is most visible in the Environmental Report. Three Fires group submitted that the Environmental Report contains virtually no mention of the history of First Nations in the Project area and that going forward, Enbridge Gas must improve its Indigenous consultation practices by, at a minimum, incorporating the histories and opinions of First Nations into its initial application materials, including environmental reports. Three Fires Group made several

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<sup>12</sup> Enbridge Gas received a Delegation Letter from the Ministry of Energy on November 10, 2022, indicating that the Ministry had delegated the procedural aspects of consultation to Enbridge Gas for the Project. The Delegation Letter identified 5 Indigenous communities to be consulted. A copy of the Delegation Letter is provided in Exhibit H, Tab 1, Schedule 1, Attachment 2

<sup>13</sup> Application and Evidence, Exhibit H, Tab 1, Schedule 1

<sup>14</sup> Enbridge Gas Response to OEB Staff 8 d) and 8 e)

requests for relief in respect to the proposed construction plan and environmental safeguards.

OEB staff submitted that Enbridge Gas appears to have made efforts to engage with affected Indigenous communities and was not aware of any concerns that could materially affect the Project that have been raised through Enbridge Gas's consultation to date. OEB staff observed that Enbridge Gas appears to be cooperating with the Indigenous communities during the consultation process and that it made certain commitments to the Indigenous communities related to the Project. OEB staff stated that it was not aware of any potential adverse impacts of the Project to any Aboriginal or treaty rights.

In its reply submission, Enbridge Gas submitted that Three Fires Group's submission unfairly diminishes efforts made by Enbridge Gas in the context of the Environmental Report and through ongoing consultation with potentially affected Indigenous communities, to understand Indigenous history in the project area and concerns. Enbridge Gas submitted that the Archeological Assessment, included as an appendix to the Environmental Report, provides significant details on the history of the Project area. Enbridge Gas further submitted that with respect to CKSPFN's history in the area, it sought to understand how the Project might affect Indigenous rights and interests and whether planned mitigation was appropriate in the circumstances or whether certain additional measures were in order.

On January 4, 2024, Enbridge Gas filed an updated application, with the Letter of Opinion it received from the MOE. The Letter of Opinion stated that the MOE completed its review of Enbridge Gas's consultation report for the Project and had reached out to the Indigenous communities identified about concerns raised and/or proposed mitigation and was satisfied with the procedural aspects of the consultation undertaken by Enbridge Gas.<sup>15</sup>

## Findings

The OEB is satisfied that Enbridge Gas followed the OEB's Environmental Guidelines with respect to Indigenous Consultation and finds that the duty to consult has been discharged sufficiently to allow it to approve the Project. This finding is also supported by the Ministry's Letter of Opinion regarding the consultations undertaken by Enbridge Gas.

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<sup>15</sup> Application and Evidence, Exhibit H, Tab 1, Schedule 1, Attachment 3

Based on the consultation records filed, Enbridge Gas provided a reasonable opportunity for the Indigenous communities to engage in meaningful consultation about the application. The OEB has also been assisted by the participation of the Three Fires Group. The OEB is satisfied that any potential impacts to rights raised by Three Fires Group have and will be mitigated through the Environmental Report, Environmental Protection Plan and the conditions of approval.

### **3.7 Conditions of Approval**

Section 32 of the OEB Act permits the OEB, when making an order, to impose conditions as it considers appropriate.

As part of its interrogatories, OEB staff suggested that the OEB's standard conditions of approval for leave to construct applications should apply to the Project with a modification to Condition 6<sup>16</sup>, requiring the applicant to confirm that the actual final Project costs are fully funded by the monthly service charge paid to Enbridge Gas by Waste Management. Enbridge Gas agreed with the suggestion.

Three Fires Group proposed several conditions of approval related to the post-approval conduct for the Project.

Pollution Probe submitted that there should be a condition of approval requiring the Technical Standards and Safety Authority (TSSA) to provide its final review letter prior to construction and that it be filed on the public record.

OEB staff submitted that the OEB should approve the Project subject to the conditions of approval attached as Schedule A to its submission.

In its reply submission, Enbridge Gas stated that it would comply with the final conditions of approval established by the OEB.

### **Findings**

The OEB accepts the conditions of approval proposed by OEB staff and accepted by Enbridge Gas.

Three Fires Group has requested several conditions of approval that address next steps related to archeological and environmental reports prior to Project implementation and recourse to the OEB should certain disputes arise. As a general proposition, the OEB is

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<sup>16</sup> Now condition 7 in schedule B



satisfied that Enbridge Gas has appropriately met the OEB's Environmental Guidelines in respect of environmental impacts and Indigenous consultation for the reasons set out in sections 3.4 and 3.6 above. The Project is mostly located in road allowances and adequate mitigation measures have been committed to as set out in the Environmental Report and Enbridge Gas will be developing an Environmental Protection Plan for the Project.

Enbridge Gas has stated its commitment to ongoing Indigenous consultation during the lifecycle of the Project and the OEB expects that it will fulfill this commitment. The OEB requires Enbridge Gas to provide Three Fires Group with its draft Environmental Protection Plan for comment prior to implementation as described in a new requirement under section 5 of the conditions of approval.

The OEB observes that Three Fires Group's submission identifies that Enbridge Gas could have taken greater care in providing more fulsome responses to concerns raised by Three Fires Group through its interrogatories. Further, Three Fires Group's submission signals that there is potential for Enbridge Gas and the Three Fires Group to improve their respective collaboration efforts and two-way dialogue. To facilitate meaningful collaboration, the OEB encourages Enbridge Gas to either directly or through its contractors employ representatives of the Three Fires Group and other affected Indigenous communities to participate as monitors for archeological and environmental matters during construction and post construction site restoration and to provide reasonable capacity funding. Equally, should Enbridge Gas implement a monitoring program, the OEB encourages the Three Fires Group to participate in developing and implementing such a program. The OEB has observed that Indigenous construction and post-construction environmental monitoring programs have been successfully developed and executed for Ontario infrastructure projects and that it has provided project proponents and relevant Indigenous communities a means to amicably resolve compliance issues with approved mitigation measures on site and to foster building capacity for both parties. Should Enbridge Gas implement such a monitoring program, the OEB directs Enbridge Gas to report on this program as described in a new reporting requirement under section 8(b)(vi) of the conditions of approval.

The OEB finds that a specific condition of approval requiring a final review letter from the TSSA is not needed as this is covered by section 3 of the conditions of approval. Further, the OEB will not require that such letter be placed on the public record.

## 4 REQUEST FOR CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

Enbridge Gas applied for an order cancelling and superseding the existing certificate of public convenience and necessity held by Enbridge Gas for the former Village of Watford and the former Township of Warwick and replacing it with a new certificate of public convenience and necessity to construct works to supply gas in the Township of Warwick as it is currently constituted.

Enbridge Gas holds a certificate dated August 25, 1965<sup>17</sup>, authorizing it to serve the geographic areas of the former Township of Warwick and the former Village of Watford. Enbridge Gas noted that the boundaries of the Township of Warwick have changed since the certificate was issued due to the amalgamation of the Township of Warwick and former Village of Watford in 1998 and other municipal restructuring.<sup>18</sup>

In response to an OEB staff interrogatory, Enbridge Gas confirmed that it holds certificates and franchises for the municipalities that are immediately adjacent to the Township of Warwick and that the certificate request does not affect another person's certificate rights.<sup>19</sup>

OEB staff submitted that the OEB should approve Enbridge Gas's request to cancel and supersede the existing certificate for the Township of Warwick dated August 25, 1965, with a new certificate that aligns to the current boundaries of the Township of Warwick.

Pollution Probe submitted that is not aware of any reason why the OEB should not approve the Certificate of Public Convenience and Necessity changes requested by Enbridge Gas.

### Findings

The OEB finds that it is in the public interest to approve Enbridge Gas's application for a new certificate for the Township of Warwick.

A new certificate, attached as Schedule C to this Decision and Order, is granted to Enbridge Gas for the Township of Warwick. This certificate cancels and supersedes Enbridge Gas's prior certificate authorizations for the former Township of Warwick, and

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<sup>17</sup> E.B.C 42

<sup>18</sup> Exhibit A, Tab 2, Schedule 1, Pages 3 and 4

<sup>19</sup> Enbridge Gas Response to OEB Staff 10-a)

the former Village of Watford. The new certificate is geographically aligned with the current municipal boundaries of the Township of Warwick.

## 5 ORDER

### THE ONTARIO ENERGY BOARD ORDERS THAT:

1. Enbridge Gas Inc. is granted leave, pursuant to section 90(1) of the OEB Act, to construct the Project in the Municipality of Brooke-Alvinston and Township of Warwick as described in its application.
2. Pursuant to section 97 of the OEB Act, the OEB approves the form of Easement Agreement and Form of Temporary Land Use Agreement that Enbridge Gas Inc. has offered or will offer to each owner of land affected by the Project.
3. Leave to construct is subject to Enbridge Gas Inc. complying with the Conditions of Approval set out in Schedule B.
4. Parties in receipt of confidential information shall either return the subject information to the Registrar and communicate to Enbridge Gas Inc. that they have done so; or destroy or expunge the information and execute a Certificate of Destruction, following the end of this proceeding, in accordance with the OEB's *Practice Direction on Confidential Filings*. The Certificate must be filed with the Registrar and a copy sent to Enbridge Gas Inc.
5. A certificate of public convenience and necessity, attached as Schedule C, is granted to Enbridge Gas Inc. to construct works or supply natural gas in the Township of Warwick. A current map of the Township of Warwick is attached as Schedule D. This certificate of public convenience and necessity cancels and supersedes E.B.C 42 (former Township of Warwick and former Village of Watford)
6. Eligible intervenors shall file with the OEB and forward to Enbridge Gas Inc. their respective cost claims in accordance with the OEB's Practice Direction on Cost Awards on or before March 21, 2024
7. Enbridge Gas Inc. shall file with the OEB and forward to intervenors any objections to the claimed costs of the intervenors on or before March 28, 2024
8. If Enbridge Gas Inc. objects to any intervenor costs, those intervenors shall file with the OEB and forward to Enbridge Gas Inc. their responses, if any, to the objections to cost claims on or before April 4, 2024.

Enbridge Gas Inc. shall pay the OEB's costs incidental to this proceeding upon receipt of the OEB's invoice.

Parties are responsible for ensuring that any documents they file with the OEB, such as applicant and intervenor evidence, interrogatories and responses to interrogatories or any other type of document, **do not include personal information** (as that phrase is defined in the *Freedom of Information and Protection of Privacy Act*), unless filed in accordance with rule 9A of the OEB's [Rules of Practice and Procedure](#).

Please quote file number, **EB-2023-0175**, for all materials filed and submit them in searchable/unrestricted PDF format with a digital signature through the [OEB's online filing portal](#).

- Filings should clearly state the sender's name, postal address, telephone number and e-mail address.
- Please use the document naming conventions and document submission standards outlined in the [Regulatory Electronic Submission System \(RESS\) Document Guidelines](#) found at the [File documents online page](#) on the OEB's website.
- Parties are encouraged to use RESS. Those who have not yet [set up an account](#), or require assistance using the online filing portal can contact [registrar@oeb.ca](mailto:registrar@oeb.ca) for assistance.
- Cost claims are filed through the OEB's online filing portal. Please visit the [File documents online page](#) of the OEB's website for more information. All participants shall download a copy of their submitted cost claim and serve it on all required parties as per the [Practice Direction on Cost Awards](#).

All communications should be directed to the attention of the Registrar and be received by end of business, 4:45 p.m., on the required date.


Email: [registrar@oeb.ca](mailto:registrar@oeb.ca)

Tel: 1-877-632-2727 (Toll free)

**DATED** at Toronto March 7, 2024

**ONTARIO ENERGY BOARD**

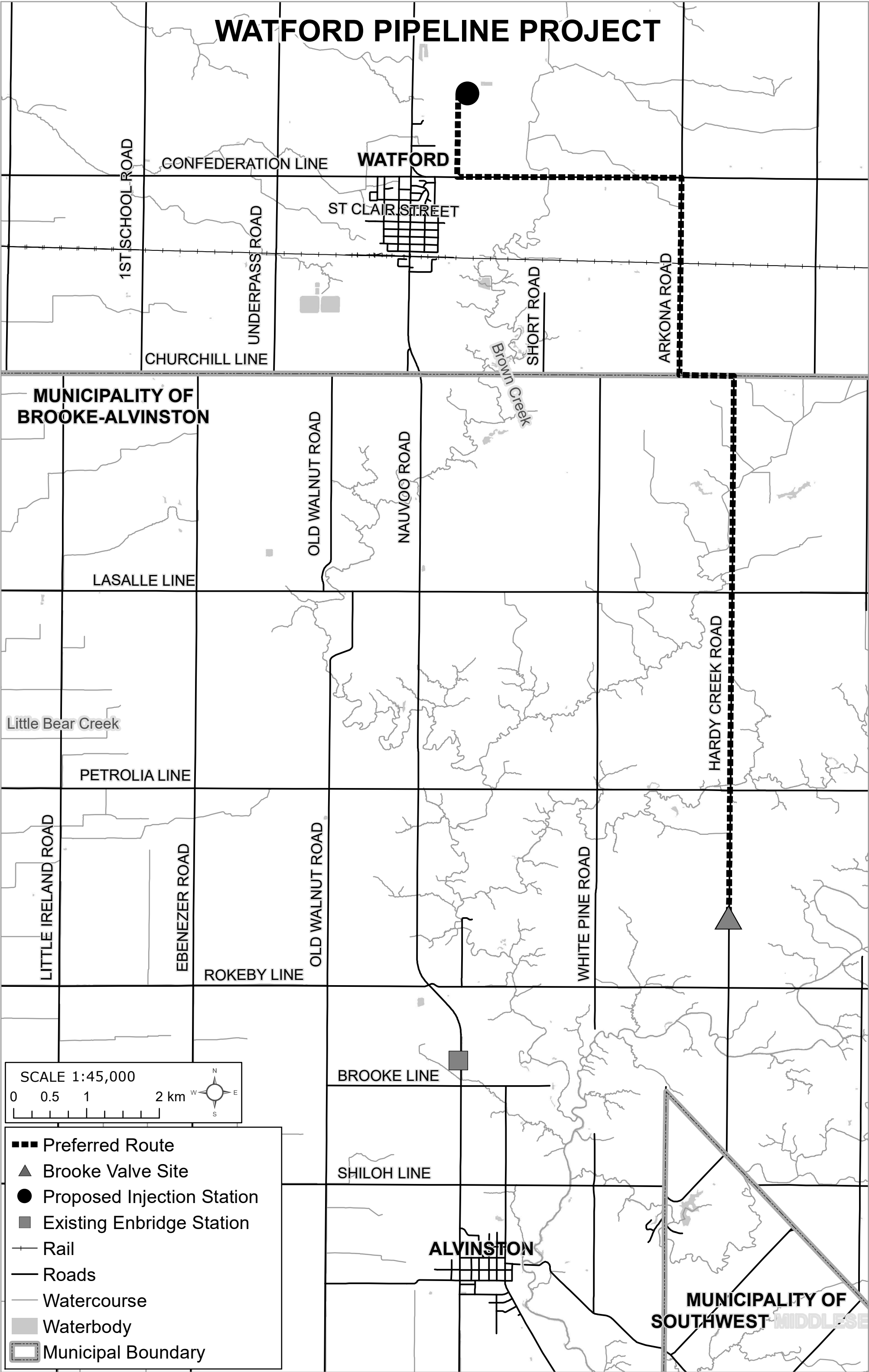
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Nancy Marconi  
Registrar

**SCHEDULE A**  
**DECISION AND ORDER**  
**ENBRIDGE GAS INC.**  
**EB-2023-0175**  
**MARCH 7, 2024**

# WATFORD PIPELINE PROJECT



**SCHEDULE B**  
**DECISION AND ORDER**  
**ENBRIDGE GAS INC.**  
**EB-2023-0175**  
**MARCH 7, 2024**



**Leave to Construct Application under  
Section 90(1) of the OEB Act**

**Enbridge Gas Inc.  
EB-2023-0175**

**Conditions of Approval**

1. Enbridge Gas Inc. shall construct the facilities and restore the land in accordance with the OEB's Decision and Order in EB-2023-0175 and these Conditions of Approval.
2. (a) Authorization for leave to construct shall terminate 12 months after the decision is issued unless construction has commenced prior to that date.  
(b) Enbridge Gas Inc. shall give the OEB notice in writing:
  - i. of the commencement of construction, at least 10 days prior to the date construction commences
  - ii. of the planned in-service date, at least 10 days prior to the date the facilities go into service
  - iii. of the date on which construction was completed, no later than 10 days following the completion of construction
  - iv. of the in-service date, no later than 10 days after the facilities go into service
3. Enbridge Gas Inc. shall obtain all necessary approvals, permits, licences, certificates, agreements and rights required to construct, operate and maintain the project.
4. Enbridge Gas Inc. shall implement all the recommendations of the Environmental Report filed in the proceeding, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee review.
5. Enbridge Gas shall provide Three Fires Group with its draft Environmental Protection Plan for comment prior to implementation.
6. Enbridge Gas Inc. shall advise the OEB of any proposed change to OEB-approved construction or restoration procedures. Except in an emergency, Enbridge Gas Inc. shall not make any such change without prior notice to and written approval of the OEB. In the event of an emergency, the OEB shall be informed immediately after the fact.
7. Concurrent with the final monitoring report referred to in Condition 8(b), Enbridge Gas Inc. shall file a Post Construction Financial Report, that:

- (a) provides a variance analysis of project cost, schedule and scope compared to the estimates filed in this proceeding, including the extent to which the project contingency was utilized
- (b) confirms that the actual final project costs will be fully funded by the monthly service charge to be paid by Waste Management of Canada Corporation.

Enbridge Gas Inc. shall also file a copy of the Post Construction Financial Report in the proceeding where Enbridge Gas Inc. proposes to start collecting revenues associated with the project.

8. Both during and after construction, Enbridge Gas Inc. shall monitor the impacts of construction, and shall file with the OEB one electronic (searchable PDF) version of each of the following reports:

- (a) A post construction report, within three months of the in-service date, which shall:
  - i. provide a certification, by a senior executive of the company, of Enbridge Gas Inc.'s adherence to Condition 1
  - ii. describe any impacts and outstanding concerns identified during construction
  - iii. describe the actions taken or planned to be taken to prevent or mitigate any identified impacts of construction
  - iv. include a log of all complaints received by Enbridge Gas Inc., including the date/time the complaint was received, a description of the complaint, any actions taken to address the complaint, the rationale for taking such actions
  - v. provide a certification, by a senior executive of the company, that the company has obtained all other approvals, permits, licenses, and certificates required to construct, operate, and maintain the proposed project
- (b) A final monitoring report, no later than fifteen months after the in-service date, or, where the deadline falls between December 1 and May 31, the following June 1, which shall:
  - i. provide a certification, by a senior executive of the company, of Enbridge Gas Inc.'s adherence to Condition 4
  - ii. describe the condition of any rehabilitated land
  - iii. describe the effectiveness of any actions taken to prevent or mitigate any identified impacts of construction
  - iv. include the results of analyses and monitoring programs and any recommendations arising therefrom

- v. include a log of all complaints received by Enbridge Gas Inc., including the date/time the complaint was received; a description of the complaint; any actions taken to address the complaint; and the rationale for taking such actions
  - vi. if a monitoring program is implemented, describe the monitoring program identifying the affected Indigenous communities employed on-site, and the capacity funding provided in connection with archeological and environmental matters during construction and post construction site restoration activities
9. Enbridge Gas Inc. shall designate one of their employees as project manager who will be the point of contact for these conditions, and shall provide the employee's name and contact information to the OEB and to all affected landowners, and shall clearly post the project manager's contact information in a prominent place at the construction site.

**SCHEDULE C**  
**DECISION AND ORDER**  
**ENBRIDGE GAS INC**  
**EB-2023-0175**  
**MARCH 7, 2024**

**EB-2023-0175**

## **Certificate of Public Convenience and Necessity**

The Ontario Energy Board grants

### **Enbridge Gas Inc.**

approval under section 8 of the *Municipal Franchises Act*, R.S.O. 1990, c. M.55, as amended, to construct works to supply natural gas in the

### **Township of Warwick**


as it is constituted on the date of this Decision and Order.

This certificate of public convenience and necessity cancels and supersedes: E.B.C 42 (former Township of Warwick and former Village of Watford),

**DATED** at Toronto, March 7, 2024

#### **ONTARIO ENERGY BOARD**

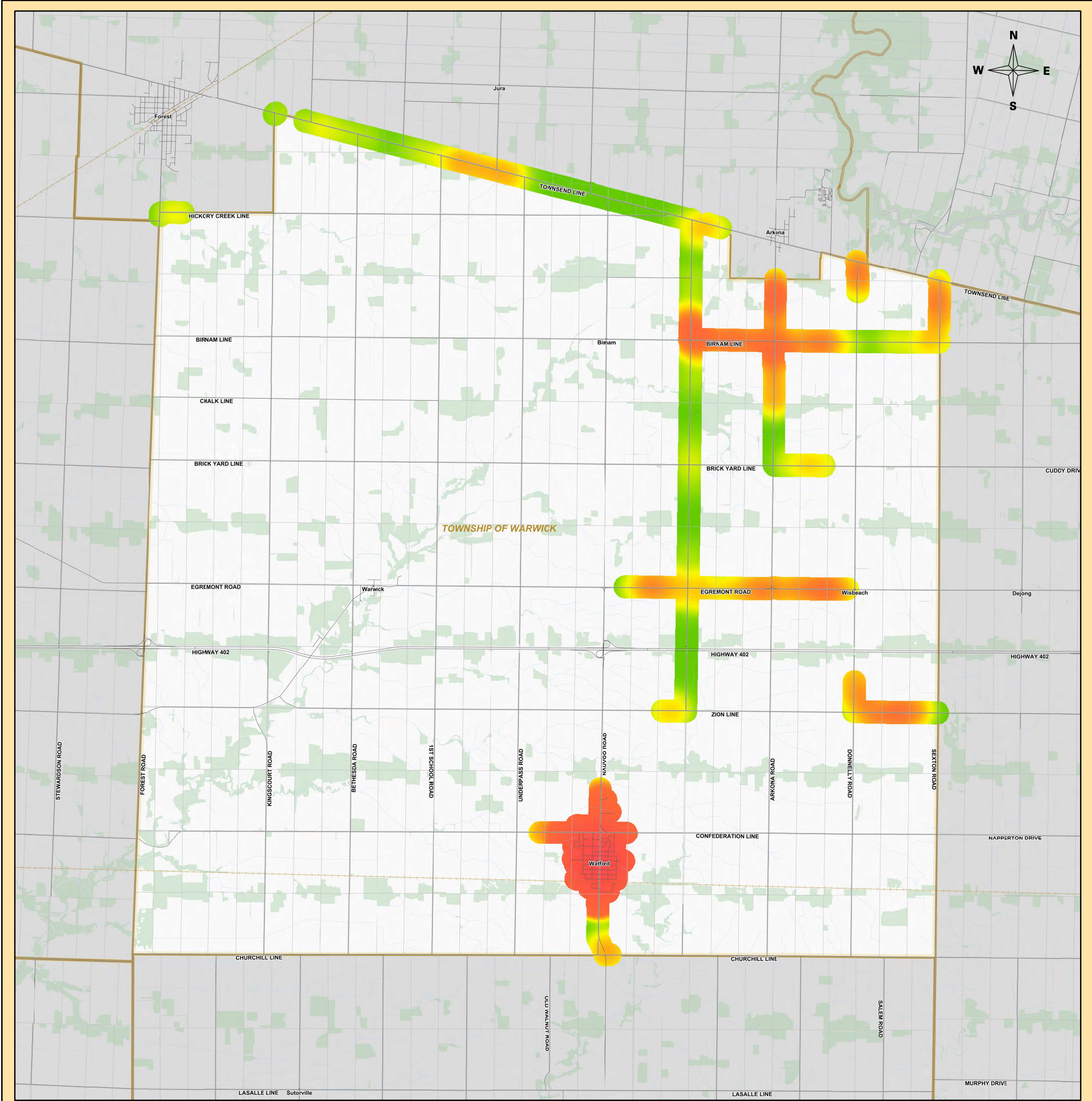
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**SCHEDULE D**  
**DECISION AND ORDER**  
**ENBRIDGE GAS INC**  
**EB-2023-0175**  
**MARCH 7, 2024**





Legend

- Enbridge Gas Pipeline Coverage Area
- Township of Warwick
- Roads
- Railways
- Municipal and Township Boundaries
- First Nation Boundaries

Customer Density

Low

High

## Township of Warwick

012345

Kilometers

**Disclaimer:**

Enbridge Gas Inc.  
The map is provided with no warranty express or Implied and is subject to change at any time. Any Person using the Density Map shall do so at its own Risk and the Density Map is not intended in any way As a tool to locate underground infrastructure for the purposes of excavation.

LOCATION MAP

MA3684 CD