

**EAST WINDSOR COGENERATION CENTRE  
PIPELINE PROJECT**

**INTERIM MONITORING REPORT**

Prepared by: Union Gas Limited  
Environmental Planning  
September, 2008

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## **1.0 INTRODUCTION**

This Interim Monitoring Report is provided in compliance with the Ontario Energy Board (“Board”) Order EB-2007-0708 granting Union Gas Limited (“Union”) “Leave to Construct” the East Windsor Cogeneration Centre Pipeline Project. The pipeline consists of approximately 5.0 km of NPS 12 inch (323.9 mm Outside Diameter) natural gas pipeline originating at a connection into Unions’ existing Panhandle System located east of Walker Road adjacent to the Canadian Pacific Railway, to the East Windsor Cogeneration Centre site located on the Ford Motor Company lands north of Wyandotte Street East and east of Cadillac Street. A map of the pipeline route is included in Appendix A.

The requirements for and details of this report are outlined in the specific conditions issued by the Board in its Order dated December 18, 2007 as listed below. The Conditions of Approval can be found in Appendix B.

Accordingly, the purpose of this Interim Monitoring Report is to fulfill these conditions.

### **1.0 Condition 1.1**

Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with its application and evidence filed in EB-2007-0708, except as modified by this Order and these Conditions of Approval.

### **Condition 1.3**

Except as modified by this Order, Union shall implement all the recommendations of the Environmental Study Report filed in the pre-filed evidence, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee (“OPCC”) review. Union shall also fulfill the commitments identified in its letter of November 21, 2007 to the Ministry of the Environment.

### **Condition 1.4**

Union Gas shall advise the Board’s designated representative of any proposed material change in construction or restoration procedures and, except in an emergency, Union Gas shall not

make such change without prior approval of the Board or its designated representative. In the event of an emergency, the Board shall be informed immediately after the fact.

**2.0 Condition 2.4**

Union Gas shall furnish the Board's designated representative with all reasonable assistance for ascertaining whether the work is being or has been performed in accordance with the Board's Order.

**3.0 Condition 3.1**

Both during and after construction, Union Gas shall monitor the impacts of construction, and shall file four copies of both an interim and final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date and the final monitoring report shall be filed within fifteen months of the in-service date. Union Gas shall attach a log of all complaints that have been received to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.

**Condition 3.2**

The interim monitoring report shall confirm Union Gas' adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction.

**Condition 5.1**

Union Gas shall obtain all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project, shall provide a list thereof, and shall provide copies of all such written approval, permit, licences, and certificates upon the Board's request.

## **2.0 BACKGROUND**

Union was granted approval to construct the East Windsor Cogeneration Centre pipeline on December 18, 2007. Construction was initiated on March 31, 2008 with the pipeline at full pressure and ready to place into service on June 27, 2008. Cleanup for the year was completed on July 04, 2008.

Construction progressed for the most part in a northerly direction with the following order of operations: horizontal directional drill (HDD) of Grand Marais Drain, HDD of Chandler Road, topsoil stripping, stringing, welding, joint coating, trenching, lowering-in, tie-ins, backfilling, testing and clean-up.

Union will return to the right-of-way in spring 2009 to complete the following activities: repair any subsidence on the right-of-way, ensure there is adequate stability and re-vegetation on disturbed areas, perform a general overview of the right-of-way and complete any additional clean-up that may be required.

## **3.0 POTENTIAL IMPACTS AND MITIGATION**

### **3.1 Condition 1.1**

Union Gas Limited (“Union”) shall construct the facilities and restore the land in accordance with its application and evidence filed in EB-2007-0708, except as modified by this Order and these Conditions of Approval.

Union has complied with all conditions imposed by the Board during construction of the pipeline and has restored the land according to the evidence in support of its application.

### 3.2 Condition 1.3

Except as modified by this Order, Union shall implement all the recommendations of the Environmental Study Report filed in the pre-filed evidence, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee (“OPCC”) review. Union shall also fulfill the commitments identified in its letter of November 21, 2007 to the Ministry of the Environment.

Union has implemented all recommendations and mitigation measures outlined in the Environmental Study Report (ER) along with all directives identified by the OPCC. Union has also fulfilled the commitments as identified in the MOE letter dated November 21, 2007 as follows:

#### 3.2.1 Contaminated Soils – Point a)

Union retained the services of an environmental consultant, CH2M HILL Canada Ltd. to review the letter dated November 15, 2007 from the Ministry of the Environment (MOE) and conduct an environmental review of the pipeline route.

CH2M HILL worked with Dillon Consulting (Dillon) who was retained by the City of Windsor as the Project Lead to manage the remediation and rehabilitation of the PCB concerns around the Grand Marais Drain.

CH2M HILL obtained test results from previous testing performed by Dillon which indicated that soils contaminated with PCB’s along the Grand Marias Drain were present to a depth of approximately one metre concentrated on the banks and within the drain itself. It was decided that the pipeline crossing of the drain would be performed using the horizontal directional drill (HDD) method which enabled the pipeline to be installed much deeper than the contaminated soil layer and therefore did not disturb any soils along the drain or interfere with the planned remediation project.

### 3.2.2 Closed Waste Site - Point b)

The MOE indicated in their letter dated November 15, 2007 that a portion of the project would be located in the general vicinity of Closed Waste Site X-6065 and appeared to be within 500 metres of the proposed route for the natural gas pipeline and therefore should take into due consideration MOE Guideline D-4 and Section 46 of the Canadian Environmental Protection Act (CEPA) as follows:

Section 46 of the Environmental Protection Act states:

“ No use shall be made of land or land covered by water which has been used for disposal of waste within a period of twenty five years from the year in which such land cease to be so used unless the approval of the Minister for the proposed use has been given”

CH2M HILL investigated the location of the landfill in question by way of a review of the MOE Historical Approval Inventory, contacts with the Environmental Services Department of the City of Windsor, the examination of historical and present day aerial photography and ground surveys of the area in question.

Based on a review of the information it is believed that a parcel of land located approximately 700 metres from the project was potentially the location of the former landfill. The UTM coordinates provide by the MOE for the landfill do not appear to be entirely accurate as they place the landfill in the centre of an area which has been residential for the last 55 years. The location of a vacant parcel of land suspected to have been the landfill is approximately 250 metres west of the UTM coordinates at the edge of the residential area.

The present information suggests that the former landfill has been closed greater than 37 years and at a distance greater then 500 metres and therefore Section 46 of the CEPA would not apply to the pipeline project.

### 3.2.3 Drilling Mud – Point c)

The MOE recommended in their letter to Union that best practices for the environmental management of drilling mud be considered during pipeline construction.

Aecon retained the services of StS Waste Management who through negotiations with the MOE where granted permission to conduct a pilot project to employ their PitDry process to determine if it would be effective at solidifying and stabilizing the HDD mud during the crossing of Grand Marais Drain. The process was successful.

Samples of the resulting soils/mud were sent for metals, PCB and leachate analysis with results indicating concentrations below the MOE Table 1 Standards and / or below the Leachate Toxic Criteria.

To determine the possibility of contaminants migrating along the pipeline corridor, Aecon retained the services of Dillon to conduct a pre-construction soil sampling program as describe within the subsequent pages, to determine the presence / absence of contaminated soils along the pipeline corridor to ensure the safety of the workers and the environment. Results indicated there were no contaminated soils along the pipeline route, however as an added precaution “plugs” consisting of dense material were installed along the pipeline corridor to impede the migration of potential contaminates.

### 3.2.4 Emerald Ash Borer – Point d)

The MOE raised concerns regarding the potential for areas of Southwestern Ontario infested with the Emerald Ash Borer and if ash trees are to be cleared, certain restrictions may apply regarding their disposal.

Union worked with the City of Windsor’s Forestry and Horticultural Department to handle all tree removal and pruning associated with the pipeline through Ford Test Track Park in accordance with the appropriate restrictions.

**3.3 Condition 1.4**

Union Gas shall advise the Board's designated representative of any proposed material change in construction or restoration procedures and, except in an emergency, Union Gas shall not make such change without prior approval of the Board or its designated representative. In the event of an emergency, the Board shall be informed immediately after the fact.

There were no changes to construction during this project.

**3.4 Condition 2.4**

Union Gas shall furnish the Board's designated representative with all reasonable assistance for ascertaining whether the work is being or has been performed in accordance with the Board's Order.

This interim monitoring report shall confirm that the work has been performed according to the Board's Order.

**3.5 Condition 3.1**

Both during and after construction, Union Gas shall monitor the impacts of construction, and shall file four copies of both an interim and final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date and the final monitoring report shall be filed within eighteen months of the in-service date. Union Gas shall attach a log of all complaints that have been received to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.

**3.5.1 Report Circulation**

Four (4) copies of this interim monitoring report are provided to the Board.

**3.5.2 Landowner Concerns**

Union's complaint tracking system, which identifies the current status of landowner complaints received as a result of pipeline construction, was in effect. A complaint is

identified as a concern raised by a landowner, which has not been resolved to the landowner's satisfaction within three (3) working days. There were no complaints entered into the complaint tracking system.

During construction, a number of concerns were raised to Union and their contractor. These issues were minor in nature and were dealt with by Union or the Contractor in an expeditious manner.

The final monitoring report will address any outstanding issues if they should arise. Union will continue to monitor the state of the land and environment and will address any additional landowner concerns, if they should arise.

### **3.6 Condition 3.2**

The interim monitoring report shall confirm Union Gas' adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction.

In fulfilment of Condition 3.2, Table 1 summarizes the construction effects and general mitigation measures carried out during construction. All mitigation techniques used throughout construction will also be implemented during cleanup activities as required.

#### **3.6.1 Monitoring Programs**

##### **3.6.1.1 Soil Monitoring**

###### **Pre-Construction Soil Sampling**

Prior to construction, Dillon was retained by Aecon to conduct a soil sampling program for the northern portion of the pipeline right of way throughout the City owned Ford Test Track Park and Ford Motor Company properties to evaluate soil conditions with respect to potential contamination.

No odours or visual signs of contamination were encountered. All analytical results were compared to the MOE Table 3 Standards and found that all chemical concentrations were below the Table 3 Standards.

3.6.1.2 Water Well Monitoring

A water well monitoring program was not necessary as the project was located within the City of Windsor and all residences and businesses were supplied by municipal water.

3.6.1.3 Watercourse Monitoring

Union implemented a monitoring program for the one (1) watercourse crossed along the pipeline route. The watercourse was crossed using the horizontal directional drill (HDD) method approved by the Essex Region Conservation Authority (SCRCA) and the Department of Fisheries and Oceans.

3.6.1.4 Tree Removal

It was necessary to relocate / remove trees within the City owned Ford Test Track Park and relocate trees in the Ford Motor Company property. Aecon retained the services of Tecumseh Spade and Nursery to relocate trees using a tree spade and worked with City of Windsor Forestry and Horticultural Department and Ford Motor Company staff to determine their new location.

Tree removal was initiated in early 2008 and completed by April 15, 2008 thus avoiding nesting avian concerns. Any necessary tree trimming or removal on city property was performed by the City of Windsor's Forestry and Horticultural Department.

3.6.1.5 Tree Replacement Program

Union will work with the City of Windsor to replace trees that were necessary to remove in the spring of 2009.

#### **4.0 Condition 5.1**

Union Gas shall obtain all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project, shall provide a list thereof, and shall provide copies of all such written approval, permit, licences, and certificates upon the Board's request.

Union Gas obtained the following environmental permits for construction:

##### **Essex Region Conservation Authority - Watercourse Crossings**

- Development, Interference with Wetlands and Alteration to Shoreline and Watercourses - Application for Permit 288 / 07

#### **5.0 SUMMARY**

This Interim Monitoring Report has been prepared as per conditions in the Board Order EB-2007-0708. The report provides an outline of Union's compliance with the commitments of its witnesses, the measures implemented during construction to minimize disturbance to the environment and a description of Union's monitoring programs. It is anticipated that these measures will effectively eliminate any long-term impacts to the environment.

A review of the pipeline route will be undertaken in the spring of 2009 to determine if any additional clean-up will be required. Should additional clean-up be required, it will be completed as soon as conditions allow in spring 2009.

A final monitoring report will be prepared to evaluate the success of the measures and if necessary outline areas in need of additional restoration.

**“Table 1”**

**Mitigation Measures**

**TABLE 1: MITIGATION SUMMARY**

<b>Issue</b>	<b>Potential Impact</b>	<b>Mitigation Measures</b>
Paved Driveways and Roadways	Disruption to local traffic, landowners and tenants	<ul style="list-style-type: none"> <li>• All paved roadways and driveways were bored if practical.</li> <li>• If it was not possible to bore driveways and roads, steel plates were on site to provide access to landowners and tenants. Union attempted to keep one lane of traffic open if possible. Traffic controls were implemented as required.</li> <li>• Driveways were repaired as soon as possible.</li> </ul>
Parking Lots	Disruptive to traffic	<ul style="list-style-type: none"> <li>• Parking lots were repaired as soon as possible.</li> <li>• Steel plates were on site to provide access, if necessary.</li> </ul>
Sidewalks	Disruptive to citizens.	<ul style="list-style-type: none"> <li>• Erect proper signage.</li> <li>• Repair as soon as possible.</li> </ul>
Traffic	Disruption to local citizens	<ul style="list-style-type: none"> <li>• At least one lane of traffic was maintained at all times.</li> <li>• Flagpersons and warning devices were used to notify traffic of the construction zone.</li> </ul>
Railways	Disruption to rail traffic	<ul style="list-style-type: none"> <li>• Railway tracks were bored / drilled.</li> </ul>
Public Safety	Public safety concerns	<ul style="list-style-type: none"> <li>• Company inspectors ensured public safety on construction site.</li> <li>• Ensured proper signage and flagpersons if required.</li> </ul>
Schools	Disturbance of school activities	<ul style="list-style-type: none"> <li>• If construction was to occur during school hours, the principal was notified prior to construction.</li> <li>• Restored area as soon as possible.</li> </ul>
Commercial/Retail Businesses and Recreational Areas	Disruption to businesses	<ul style="list-style-type: none"> <li>• Ensured access at all times.</li> <li>• Restored area as soon as possible after construction.</li> <li>• Scheduled construction with owners or managers.</li> </ul>
Construction Noise	Disturbance to landowners	<ul style="list-style-type: none"> <li>• Construction was carried out during daylight hours whenever possible.</li> <li>• Ensured equipment is properly muffled.</li> </ul>
Nuisance Dust	Disruption to landowners	<ul style="list-style-type: none"> <li>• Control dust as required.</li> </ul>
Construction Equipment	Disruption to landowners	<ul style="list-style-type: none"> <li>• Equipment was stored off road shoulders when not in use.</li> </ul>
Landowner Concerns	Disruption to landowners	<ul style="list-style-type: none"> <li>• Union provided landowners and tenants with the telephone numbers of supervisory personnel.</li> </ul>
Fences	Disruption to landowners	<ul style="list-style-type: none"> <li>• Landowners were contacted before any fences are disturbed.</li> <li>• Temporary fencing were erected if requested by landowner.</li> <li>• Fences were replaced as soon as possible.</li> </ul>
Front Yards	Disruption to landowners	<ul style="list-style-type: none"> <li>• Landowners and tenants were notified before construction.</li> <li>• Restored lawns to original condition.</li> </ul>

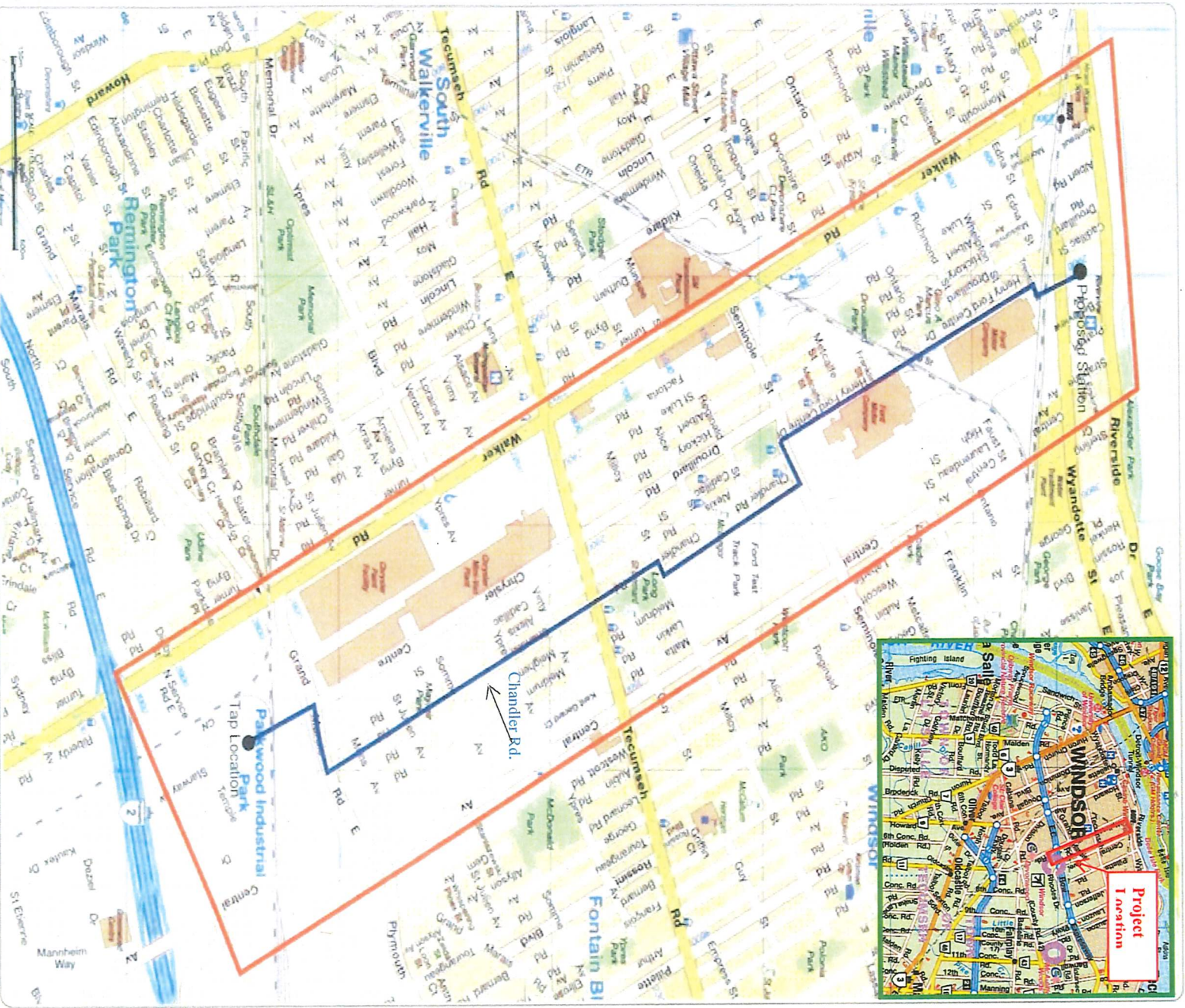
**TABLE 1: MITIGATION SUMMARY (Continued)**

<b>Issue</b>	<b>Potential Impact</b>	<b>Mitigation Measures</b>
Underground Utilities	Disruption of services	<ul style="list-style-type: none"><li>• Obtained “locates” from all utilities.</li><li>• If utilities were damaged, they were repair as soon as possible.</li></ul>
Trees	Damage to trees	<ul style="list-style-type: none"><li>• Altered alignment to avoid trees if possible.</li><li>• Pipeline was located 1 metre away from base of trees if possible.</li><li>• Discussed restoration plans with landowner / City of Windsor.</li></ul>
Vegetative Cover	Loss of vegetative cover leading to soil erosion	<ul style="list-style-type: none"><li>• Restored cover by means of seeding or hydroseeding as soon as possible.</li></ul>
Site Restoration	Disturbance to public properties	<ul style="list-style-type: none"><li>• Construction area was restored as soon as possible upon completion of pipe installation.</li></ul>
Watercourses	Water quality concerns	<ul style="list-style-type: none"><li>• Union has complied with all conditions of approval of the Conservation Authority and the Department of Fisheries and Oceans.</li><li>• Union adhered to Company specifications for watercourse crossings.</li></ul>
Spills	Public safety issue	<ul style="list-style-type: none"><li>• Ensure the Ministry of Environment is notified.</li><li>• No spills reported.</li></ul>
Contaminated Soils	Dealing with contaminated materials  Public safety issue	<ul style="list-style-type: none"><li>• Ensure the Ministry of Environment is notified, if necessary.</li><li>• Clean up contaminated material following Company and MOE procedures.</li><li>• No contaminated soils encountered</li></ul>

**“Appendix A”**

**Location Map**

# GENERAL LOCATION MAP EAST WINDSOR COGENERATION



Legend  
 Study Area  
 Preferred Route

AQUARIUM ENVIRONMENTAL CONSULTING INC.

Preferred Route

Date Issued:	June 2007	Figure No:	2
Created By:	PHD	Client:	East Windsor Cogeneration
Project No:	07-021	Project Name:	Peperine Project
Figure 2			

**“Appendix B”**

**Conditions of Approval**

**EB-2007-0708**

**Union Gas Limited**

**East Windsor Cogeneration Centre**

**Leave to Construct Application**

**Conditions of Approval**

**Leave to Construct**

**1 General Requirements**

- 1.1 Union Gas Limited ("Union ") shall construct the facilities and restore the land in accordance with its application and the evidence filed in EB-2007-0708, except as modified by this Order and these Conditions of Approval.
- 1.2 Unless otherwise ordered by the Board, authorization for Leave to Construct shall terminate December 31, 2008, unless construction has commenced prior to then.
- 1.3 Except as modified by this Order, Union shall implement all the recommendations of the Environmental Study Report filed in the pre-filed evidence, and all the recommendations and directives identified by the Ontario Pipeline Coordinating Committee ("OPCC") review. Union shall also fulfill the commitments identified in its letter of November 21, 2007 to the Ministry of the Environment.
- 1.4 Union shall advise the Board's designated representative of any proposed material change in construction or restoration procedures and, except in an emergency, Union shall not make such change without prior approval of the Board or its designated representative. In the event of an emergency, the Board shall be informed immediately after the fact.

**2 Project and Communications Requirements**

- 2.1 The Board's designated representative for the purpose of these Conditions of Approval shall be the Manager, Facilities.
- 2.2 Union shall designate a person as project engineer and shall provide the name of the individual to the Board's designated representative. The project engineer will be responsible for the fulfilment of the Conditions of Approval on the construction site. Union shall provide a copy of the Order and Conditions of Approval to the project engineer, within seven days of the Board's Order being issued.
- 2.3 Union shall give the Board's designated representative and the Chair of the OPCC ten days written notice in advance of the commencement of the construction.
- 2.4 Union shall furnish the Board's designated representative with all reasonable assistance for ascertaining whether the work is being or has been performed in accordance with the Board's Order.
- 2.5 Union shall file with the Board's designated representative notice of the date on which the installed pipelines were tested, within one month after the final test date.
- 2.6 Union shall furnish the Board's designated representative with five copies of written confirmation of the completion of construction. A copy of the confirmation shall be provided to the Chair of the OPCC.

### **3 Monitoring and Reporting Requirements**

- 3.1 Both during and after construction, Union shall monitor the impacts of construction, and shall file four copies of both an interim and a final monitoring report with the Board. The interim monitoring report shall be filed within six months of the in-service date, and the final monitoring report shall be filed within fifteen months of the in-service date. Union shall attach a log of all complaints that have been received to the interim and final monitoring reports. The log shall record the times of all complaints received, the substance of each complaint, the actions taken in response, and the reasons underlying such actions.
- 3.2 The interim monitoring report shall confirm Union's adherence to Condition 1.1 and shall include a description of the impacts noted during construction and the actions taken or to be taken to prevent or mitigate the long-term effects of the impacts of construction. This report shall describe any outstanding concerns identified during construction.
- 3.3 The final monitoring report shall describe the condition of any rehabilitated land and the effectiveness of any mitigation measures undertaken. The results of the monitoring programs and analysis shall be included and recommendations made as appropriate. Any deficiency in compliance with any of the Conditions of Approval shall be explained.

### **4 Easement Agreements**

- 4.1 Union shall offer the form of agreement approved by the Board to each landowner, as may be required, along the route of the proposed work.

### **5 Other Approvals and Agreements**

- 5.1 Union shall obtain all other approvals, permits, licences, and certificates required to construct, operate and maintain the proposed project, shall provide a list thereof, and shall provide copies of all such written approvals, permits, licences, and certificates upon the Board's request.

**“Appendix C”**

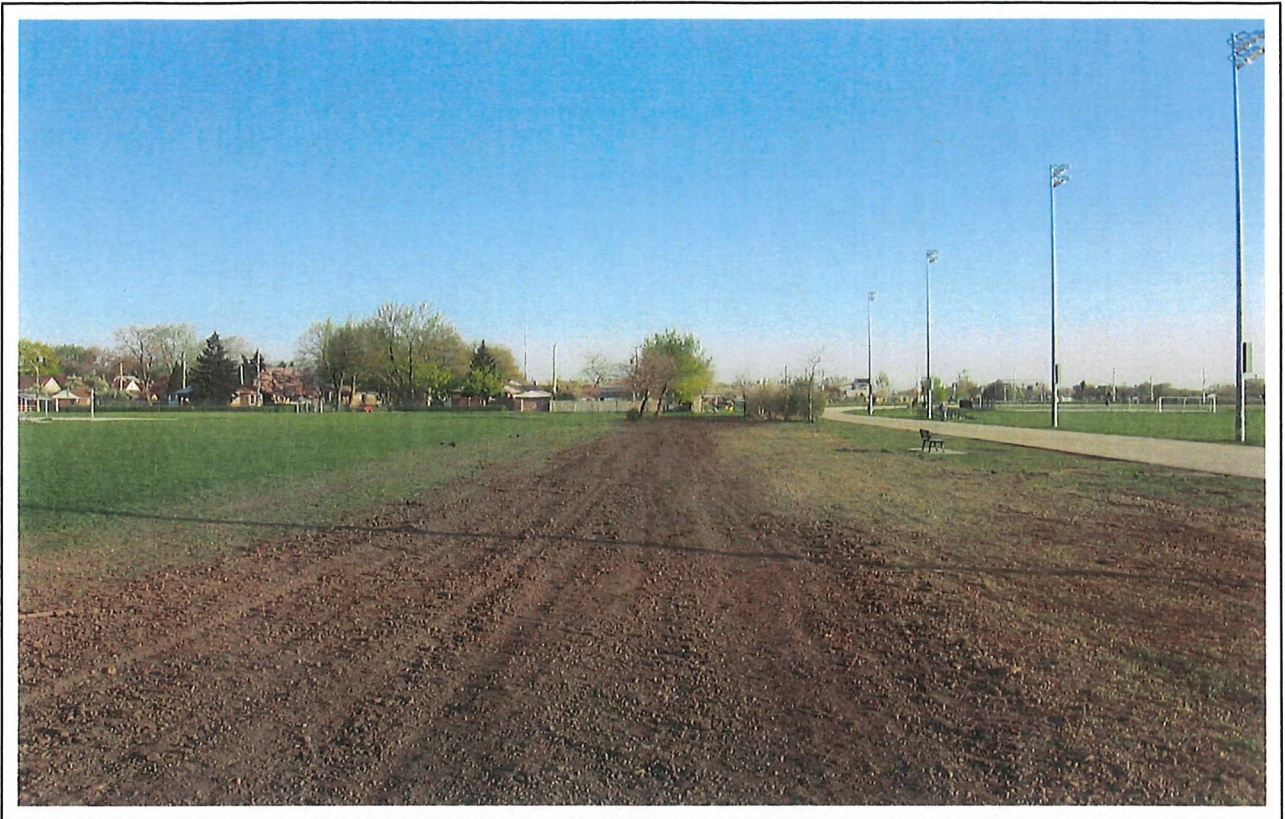
**Photograph Inventory**



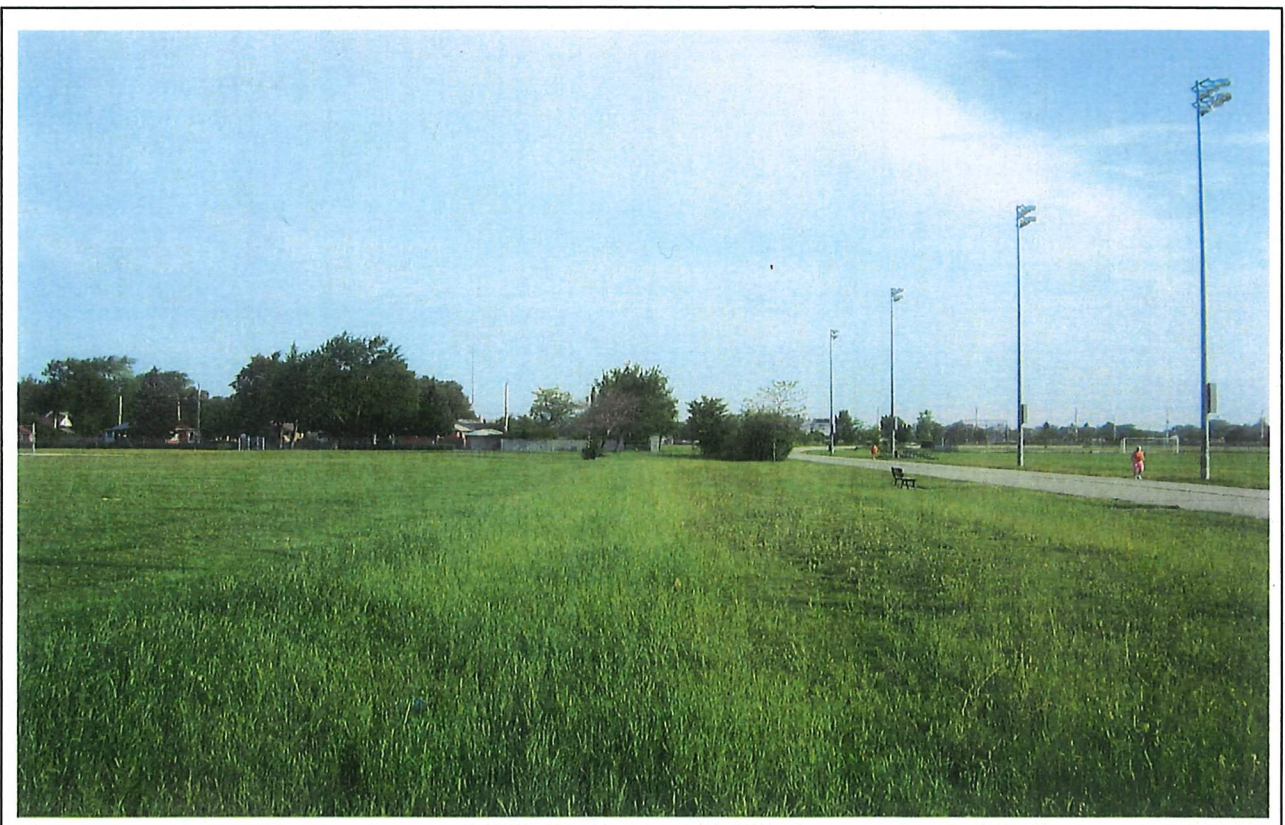
Trees to be relocated within Ford Test Track Park were flagged prior to removal and transplanted close to their original location.



Trees which needed to be relocated within the park were done so using a tree spade.



Following the installation of the pipeline, the area was backfilled, levelled and seeded.



With the frequent rains and warm temperatures, the area revegetated quickly. This picture was taken one month after the previous picture.



Temporary fencing was installed along school yards for added safety.



During construction on city streets, one lane of traffic was maintained where ever possible.



Signs were posted whenever sidewalks were obstructed to inform pedestrians of possible hazards.



Whenever possible, pipe was stored in front of non-residential areas to allow access to driveways. In this case, the pipe was strung and welded in front of city parkland.

**“Appendix D”**  
**MOE Response Letter - November 21, 2007**

November 21, 2007

Ministry of the Environment  
733 Exeter Road  
London, Ontario  
N6E 1L3

**Attention: Craig Newton, Regional Environmental Planner**

**Re: Union Gas Limited  
Leave to Construct Natural Gas Pipeline To East Windsor Cogeneration  
Centre, Ontario Energy Board No. EB-2007-0708**

Dear Mr. Newton:

Thank you for your letter dated November 15, 2007 concerning the review of Unions "East Windsor Cogen Centre Pipeline Project Environmental Report"

In response to your comments regarding these issues we offer the following:

- a) The MOE has identified an area of PCB and metal contamination in a localized area of sediments and dredge material in and along the Grand Marais Drain between the CPR crossing and Chrysler Centre Road and that remediation of the sites are planned for the summer of 2008. The letter also addresses the potential for the pipeline corridor to collect contaminants and serve as a conduit for the movement of the contaminants. In discussions with the effected landowners, Union was made aware of this issue after the Environmental Report had been completed.

Union will retain the services of an Environmental Consultant to review the issues as presented in the letter and work with the property owners and the MOE to determine the extent of the contamination along the pipeline route and develop mitigation measures to contain and prevent the possible migration of contaminates along the pipeline.

The consultant will also work with the MOE and the Project Leads (City of Windsor and a Private Partner) to generate a strategy which may allow for the installation of the pipeline in conjunction with the planned remediation of the sites.

- b) As noted in your letter, a Closed Waste Disposal Site X-6065 is located in the general vicinity of Drouillard Road and Seminole Street in the City of Windsor and "appears" to be located with in 500 metres from the preferred route of the pipeline.

Unions Environmental Consultant will review the MOE June 1991 Waste Disposal Site Inventory report. If it is determined that there is a waste disposal site that will impact the proposed pipeline, Union will ensure that all aspects of Section 46 of the Environmental Protection Act as well as the MOE Guideline D-4 will be followed.

- c) The MOE Sarnia District and Southwest Region has identified issues with the management of drilling fluids used in horizontal drilling. As well the District has concerns where risk management is necessary to prevent the contamination of the pipeline corridor from historical sources of contamination.

Union Gas is in the process of reviewing their best practices for the environmental management of the handling and disposal of drilling fluids. As previously mentioned, Unions Environmental Consultant will be investigating methods to mitigate the potential of contaminates migrating along the pipeline corridor which may also be applied to horizontal drilling.

- d) You have indicated that tree clearing in the study area may have restrictions under the Canadian Food Inspection Agency (CFIA) due the to Emerald Ash Borer infestation.

Union has worked closely with the CFIA in past projects and is aware of therestrictions in place for the handling of any Ash material. It is not anticipated that tree removal will be necessary along the pipeline route, however if Ash material is removed, proper precautions will be taken to ensure compliancewith those regulations.

- e) Union gas appreciates your reference to the error made in the Project Environmental Report pertaining to the discharge location of Grand Marais Drain / Turkey Creek.

If you have any further questions or comments regarding the project, please contact me at 1800-571-8446 x 2936 or at npdumouchelle@spectraenergy.com.

Yours truly,

Norm Dumouchelle  
Environmental Planner  
Union Gas Limited