

Information Request

Information Request
To: Northern Gateway Pipelines Inc.
From: Fort St James Sustainability Group

Northern Gateway Pipelines Inc. Enbridge Northern Gateway Project

Information Request No. 1

1.1 Location, Fort St. James Pump Station

Reference:

- i. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Section 8: Pump Stations, pps; 8-1, 8-2, 8-6
- ii. Sec. 52 Application, Vol 6A: Environmental and Socio-Economic assessment (ESA) – Pipelines and Tank Terminal, Section 5: Acoustic Environment, p.5-16
- iii. Sec. 52 Application, Vol. 3 Engineering, Construction, and Operations, Section 2: Alternative Means to Construct the Project, Sec. 2.5, Intermediate Pump Station Locations, pps. 2-12, 2-13
- iv. Update to Sec. 52 Application, Vol. 4, 2010 Update, Appendix Q – Landowner Concerns Table, p. Q-3

Preamble:

The application proposes to locate a pump station at kilometre 828.4, just south of the community of Fort St James. This proposed location is adjacent to a rural residential neighbourhood, and situates the pump station within a kilometre of residences and immediately adjacent to Highway 27, the main road into Fort St James from the south. The pump station is designed to be 4 hectares in size, consisting of four (4) buildings, a containment berm, fencing, and associated security installations (Reference i).

The proponent states that the “site-selection process for pump station sites tried to avoid locations near residents or communities while limiting major environmental site disturbance” (Reference ii). The proponent also states that proximity to residences was a consideration in determining intermediate pump station locations (Reference iii).

The proponent indicates that it has no control over how pipelines impact property assessment (Reference iv). The proponent confirms that properties over which it has rights-of-way and easements have routinely been bought and sold over a 60-year period, suggesting that the pipeline does not have a negative effect on property values (Reference iv).

Request:

1. Why is the proposed Fort St James pump station located within 1 kilometre of rural residences and the main road into Fort St James if, as the application states, the goal was to avoid locations near residences and communities?
2. How was the proposed location for the Fort St James pump station identified and chosen?
3. Why was that specific location chosen, as opposed to other similar properties in the same area?
4. What other sites were there under consideration that were not in such close proximity to rural residences? Why were they not chosen?
5. If the location is on private property, will Northern Gateway lease the property for the pump station, or will it be purchased outright?
6. How will property values change as a result of residences being located within the 1 kilometre corridor of the proposed Fort St James pump station?
7. Please provide details of Canadian rural properties over which Enbridge has rights-of-way and easements that have been “routinely bought and sold” (Reference iv) over the past five (5) years, indicating pre- and post-pipeline prices and assessments.

1.2 Noise Levels, Fort St. James Pump Station**Reference:**

- i. Sec. 52 Application, Vol. 6A: Environmental and Socio-Economic assessment (ESA) – Pipelines and Tank Terminal, Sec. 5 – Acoustic Environment, p. 5-1, Table 5-11, p. 5-28

Preamble:

The proponent states that the project is to be built in “remote areas of British Columbia” (Reference I, p. 5-1), where it is assumed that no one will be disturbed by the continuous background noise expected from pump station operations (Reference i, Table 5-11, p. 5-28). We would like to point out to the proponent that there are approximately 100+ people living in a rural residential community within 1.5 kilometre earshot of the Fort St James pump station.

Request:

1. Please provide the sound levels at 50-metre increments within and including the border of a 1.5 kilometre corridor during:
 - (a) Fort St James pump station construction, including if any blasting is required
 - (b) pump station testing and commissioning
2. Please provide the sound levels during proposed Fort St James pump station operations at 50-metre increments within and including the border of a 1.5 kilometre corridor
 - (a) during winter months
 - (b) during summer months

1.3 Hazardous Storage Building, Fort St. James Pump Station

Reference:

- i. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Sec. 8, Pump Stations, p.8-6

Preamble:

The proposed design for the Fort St James pump station calls for four (4) buildings: a pump house, two (2) electrical services buildings (ESB) and a hazardous storage building (Reference i). We have been unable to find a description in the application of what the hazardous storage building will house or what security measures will be in place to maintain the safety of the hazardous materials contained within.

Request:

1. Please provide specific details about the hazardous storage building at the proposed Fort St James pump station, including but not limited to:
 - (a) specific items and hazardous materials contained in the hazardous storage building
 - (b) security measures in place to maintain the safety of the contents of the hazardous storage building

- (c) the types of hazardous releases that could occur from within the hazardous storage building
- (d) the process in case of a spill or release of hazardous materials from the Fort St James pump station
- (e) the nature of hazardous substance training specific to pump stations to be provided for local emergency responders
- (f) the specific types of hazardous substance equipment specific to the Fort St James pump station to be provided for local emergency responders
- (g) where this equipment will be located
- (h) who will have the authority to make this equipment available to local emergency responders in case of a spill or release of hazardous substances
- (i) the response plan in case of a spill or release of hazardous substances
- (j) the public notification and communications plans in case of a spill or release of hazardous substances

1.4 Potential Spills and Spill Response, Fort St. James Pump Station

Reference:

- i. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Section 8: Pump Stations, p. 8-1
- ii. GOSRP_11-031-090_REV0 A-91 - Potential Full-Bore Rupture Releases and Spill Extents - KP 823 to KP 834
- iii. General Oil Spill Response Plan, March 2011, Section 6: Land Response, Section 6.5 Recovery and Removal, p. 6-6
- iv. *Looking at Enbridge's 2009 Spill Record*, <http://www.enbridge.com/AboutEnbridge/CorporateSocialResponsibility/Environment/LookingAtEnbridgesSpillRecord.aspx>

Preamble:

In 2009 Enbridge reported a total of 69 spills in Canada and 20 in the United States. Of that, 80 spills were reported at pump stations and terminals. Enbridge states that most of those spills involved less than 100 barrels of oil (Reference iv).

Reference (i) indicates the Fort St James pump station location, and refers to various safety measures and systems in place at pump station locations.

Reference (ii) is a map indicating potential spill impacts from a leak at the Fort St James pump station.

The General Oil Spill Response Plan provides measures and direction for reaction to spills along the pipeline route, including a pump station spill. Section 6.5 provides options for site cleanup following removal of pooled hydrocarbons (Reference iii). These measures may significantly impact rural residents living within the 1.5 kilometre area of the pump station.

Request:

1. Please provide spill records indicating number, location, and size of release for Enbridge pump station incidents for the past five (5) years.
2. Please indicate what the annual percentage of Enbridge spills have occurred at pump stations over the past five (5) years.
3. Please describe the potential spill risk factors specific to the Fort St James pump station.
4. Please provide the impact of the release of 100 barrels of oil from the Fort St James pump station. Include impacts on wetlands and water courses, agricultural lands, and local wells and drinking water.
5. Please provide a spill scenario that includes the sequence and generalized timeline of events associated with the initial response to a release of 100 barrels of oil from the Fort St James pump station. In the scenario please include the following:
 - estimated timeline between detection of the spill and notification to local emergency responders, landowners and occupants, local residents
 - decision-tree specific to Fort St James emergency responders as it relates to working with Enbridge employees and the command centre in Edmonton
 - who is responsible for clean-up
 - who is responsible for costs associated with clean-up
 - who monitors clean-up activities
 - noise levels associated with site cleanup and final site remediation within the 1.5 kilometre area of the pipeline

- consultation to be taken with affected residents regarding site cleanup and remediation following a spill
6. What is the process if a release from the pump station is detected by an individual and not by the Northern Gateway monitoring system? How does an individual initiate a response to an incident which the SCADA system has missed?

1.5 Security, Fort St. James Pump Station

Reference:

- i. Sec. 52 Application, Vol. 6A: Environmental and Socio-Economic assessment (ESA) – Pipelines and Tank Terminal, Sec. 2.1.22 – Project Description, p.2-5
- ii. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Sec. 11 – Security, pps. 11-2, 11-4, Table 11-1
- iii. *Pump Stations Fact Sheet*, Northern Gateway, Document No: NGP-FS-03-005, rev. Jan. 2011

Preamble:

The application indicates that there is no continuous on-site presence at the Fort St James pump station location, including security personnel. The pump station is monitored remotely by the Control Centre in Edmonton (Reference ii, p. 11-2).

The proponent describes a series of physical security measures to be undertaken at pump station locations as part of an overall security management framework. These physical measures “may” include “perimeter fencing, intrusion alarms, surveillance systems and lighting”, as well as video surveillance (Reference ii, p. 11-4). As the pump station is located in a rural residential neighbourhood this raises local concerns about noise from alarms, light pollution from security lighting, and lack of an on-site presence to monitor for and deal with both security breaches and false alarms.

The proponent states that they will work with local policing authorities to identify and monitor security trends and issues. Relying on local emergency personnel to provide security for the pipeline and pump station operations may place a drain on local resources and may jeopardize the safety and security of community residents. Who fights the fire in town when the local fire department is out at the pump station site trying to find the source of an intrusion alarm?

Reference (i) indicates that the Fort St James pump station will be surrounded by a chain-link fence of at least 2 metres in height.

Reference (ii) outline Northern Gateway's security management system, and indicates the types of physical security measures which "may" be used. Table 11-1 indicates that the only pipeline employees in British Columbia (other than those at the Kitimat terminal) will be technicians (15), two (2) supervisors, and administrative staff (9). There are no control centre operators in BC, and no security staff or personnel indicated in the anticipated employee hiring for pipeline operations.

Reference (iii) indicates that pump stations are unmanned, fenced, remotely monitored, and protected by alarms and video surveillance.

Request:

1. What physical security measures "may" be employed at the Fort St James pump station, other than those already indicated in Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Sec. 11 – Security, p.11-4?
2. Why is the reliance for security placed on local responders in communities along the pipeline route?
3. Why is Northern Gateway not hiring on-site security personnel for pump stations?
4. Please provide a scenario that includes the sequence and generalized timeline of events associated with a security breach at the Fort St James pump station. In the scenario please include the following:
 - who the local first responder is to a security breach at the Fort St James pump station
 - estimated timeline between detection of a security breach and notification to local emergency responders
 - decision-tree specific to Fort St James emergency responders as it relates to working with Northern Gateway employees and the command centre in Edmonton
 - who is responsible for investigating the security breach on the ground in Fort St James
 - at what point an Northern Gateway employee becomes involved in resolving the security breach
 - the working relationship between local emergency personnel and Northern Gateway employees, including any protocols that have been signed or developed

5. What types of lights will be used around the perimeter of the proposed Fort St James pump station as part of the security system?
6. Please provide details of light pollution levels:
 - (a) at 50-metre increments within and including the border of a 1.5 kilometre corridor of the proposed Fort St James pump station
 - (b) at the most affected residences
7. Please provide details of sound levels associated with security lighting:
 - (c) at 50-metre increments within and including the border of a 1.5 kilometre corridor of the proposed Fort St James pump station
 - (d) at the most affected residences
8. What types of alarms will be used at the proposed Fort St James pump station as part of the security system?
9. What kind of sound will the intrusion alarms make? Will it be audible?
10. If the intrusion alarm is audible, please provide details of sounds levels from the alarm to be used:
 - (e) at 50-metre increments within and including the border of a 1.5 kilometre corridor of the proposed Fort St James pump station
 - (f) at the most affected residences
11. Do the type of alarms to be used shut themselves off after a certain timeframe, or do they require a manual shut-off? Does that have to be done by the Command Centre system, or is it done locally?
12. What is the process if a local resident discovers or identifies a security breach, such as a hole in a fence? What steps does a rural resident living close to the pump station take in order to initiate a response to a security breach that Northern Gateway has not identified?

1.6 Emergency Response, Fort St. James Pump Station

Reference:

- i. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Section 9: Kitimat Terminal, p. 9-13, 14, 15, 16

- ii. Sec. 52 Application, Vol. 3: Engineering, Construction, and Operations, Section 8: Pump Stations, p. 8-3

Preamble:

The Fort St James pump station is to be located in a forested area south of the community, adjacent to the main road into town. It is within the community's fire protection zone, with a fire at the pump station initiating response from the local volunteer fire department.

In the past few years there have been significant wildfires in the central part of the province, including one just south of Vanderhoof and the Binta Lake fire near Burns Lake in 2010. The applicant provides detail on fire suppression at the Kitimat terminal (Reference i), but no information specific to fire suppression or forest fire emergency planning for the Fort St James pump station.

In October of 2006 Fort St James and the surrounding area was hit with over 30 inches of snow in a 36-hour period, resulting in power outages lasting several days and roads that were impassable. The proponent states that UPS systems and back-up generators will be designed to respond to loss of primary power supply (Reference ii).

Request:

1. What is the fire suppression plan for the Fort St James pump station?
2. If reliance is on local fire emergency services, what discussions have occurred to date with the District of Fort St James and the RCMP detachment in Fort St James as to providing response in the case of a fire at the pump station?
3. What discussions have occurred to date with the District of Fort St James' emergency planning team regarding the impact of providing a response to a pump station incident on local emergency services?
4. What discussions have occurred to date with the District of Fort St James in regards to compensation for the costs of providing a response to a fire at the pump station?
5. What emergency and response plans are in place in case of a forest fire in the vicinity of the proposed Fort St James pump station?
6. What public notification and communications processes are in place in case of a fire or an explosion at the proposed Fort St James pump station?

7. How would a prolonged power outage of several days and inability to reach the site by road, such as the situation that occurred in October of 2006, affect pump station operations?

1.7 Consultation, Fort St. James Pump Station

Reference:

- i. Update to Sec. 52 Application for the Enbridge Northern Gateway Project, Vol. 4 – 2010 Update, Section 11: Landowner Consultation, p. 11-1
- ii. Update to Sec. 52 Application, Vol. 4, 2010 Update, Appendix Q – Landowner Concerns Table

Preamble:

The proponent indicates that consultation with affected landowners and occupants within the 1 kilometre pipeline corridor, and those within 1.5 kilometres of the proposed pump station location, was undertaken from July to October of 2010, and that a second round of consultation was scheduled to take place in the spring of 2011. A third round is scheduled for the second quarter of 2011, and should take two to three months to complete (Reference i).

The proponent indicates that consultation takes many forms (Reference i), and has resulted in landowners identifying issues of concern, as included in Update to Sec. 52 Application, Vol. 4, 2010 Update, Appendix Q – Landowner Concerns Table.

Northern Gateway states in the application that a process to consult with landowners on the issues identified in previous consultation rounds was to begin in the second quarter of 2011 (Reference i).

Request:

1. Please define the nature and types of consultation conducted to date with landowners and occupants within 1.5 kilometres of the Fort St James pump station.
2. Please provide details on specific landowner concerns raised with regards to the Fort St James pump station, and how they have been addressed through the consultation process identified to begin in the second quarter of 2011 in response to identified landowner concerns.

3. Please provide details of the consultation undertaken with affected residents within 1.5 kilometres of the Fort St James pump station with reference specifically to the pump station construction process, including but not limited to:
 - (a) RoW and site preparation, including timber salvage, clearing, brush removal, and soil stockpiling or removal
 - (b) the potential for blasting due to the presence of hard rock
 - (c) anticipated noise levels during construction
 - (d) expected duration of construction
 - (e) potential for construction to be taking place during evening and overnight hours
 - (f) impact on local traffic patterns, specifically given that the access road turns out onto the main access road in and out of Fort St James and sees considerable local, farm, and industrial traffic
 - (g) possible location of a construction camp location within the area
 - (h) impact on agricultural operations within the 1.5 kilometre area
 - (i) impact on local recreational activities during winter construction
 - (j) noise levels during the testing and commissioning processes
 - (k) the process for addressing outstanding concerns raised by affected residents