



Canada Energy Regulator Régie de l'énergie du Canada

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File OF-Surv-Gen-T217 01
30 June 2020

Ms. Gail Sharko
Manager, Regulatory & External Affairs
Trans-Northern Pipelines Inc.
109-5305 McCall Way NE
Calgary, AB T2E 7N7

Dear Ms. Sharko:

**Trans-Northern Pipelines Inc. (TNPI)
Report Submission dated 27 December 2018 pursuant to Condition 4.d of
Amending Safety Order AO-002-SO-T217-03-2010¹ (ASO)**

On 27 December 2018, the National Energy Board (the NEB) received a report from TNPI pursuant to Condition 4.d of the ASO entitled "Watercourse Crossing Management Program (WCMP) Project No.: 0293023 December 21, 2018" (WCMP filing).

The Commission of the Canada Energy Regulator (Commission) has reviewed the WCMP filing. The Commission has also reviewed the related Information Requests in 2019, the addendum to the Report submitted on 24 January 2020, the status update of all Report recommendations submitted on 31 March 2020, in addition to the records of the related compliance verification activities through 2019 and 2020.

The Commission notes that the WCMP filing indicates TNPI has evaluated its pipeline risk and reliability at all water crossings and it has developed and implemented a water crossing management program in compliance with all the Condition 4.d requirements.

The Commission also notes that the current schedule for implementation of all mitigation, prevention and monitoring programs identified in the WCMP pursuant to Condition 4.d.iv extends out to 2027.

The Commission considers that TNPI has met the requirements of Condition 4.d. Therefore, the Commission approves the WCMP.

The Commission expects TNPI to implement all recommendations and mitigations of the Report and its addendum as committed in its filings.

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¹ TNPI's filing referred to "AO-003-SO-T2172010", but the operative condition appears in AO-002-SO-T217-03-2010.

The Commission understands that the evaluation of pipeline risk and reliability at all water crossings and the implementation of the WCMP is an on-going and iterative process. The Commission also understands that the timelines and prioritization of water crossings mitigation identified in the WCMP are based on multiple factors and ultimately on TNPI's Corporate Risk Ranking, which is subject to change as new information becomes available.

The Commission reminds TNPI that it is required to continually evaluate its pipeline risk and reliability at water crossings and perform the required mitigations in a timely manner to ensure the safe operation of the pipeline system and protect the environment.

The CER will continue to conduct active monitoring and regulatory oversight of TNPI's pipeline system operation to ensure it implements all recommendations of the Report and finalizes the existing, or any new, water crossing site mitigations as committed to, in the addendum to the Report and as continually informed by ongoing risk assessments.

The CER is dedicated to the safety and well-being of its staff, Indigenous communities, the public, and all those with whom we work closely. For more information on how the CER is continuing its regulatory oversight during the COVID-19 pandemic, please refer to the following letter issued 12 May 2020: www.cer-rec.gc.ca/CovidProcessUpdate.

Yours sincerely,

Original signed by

Jean-Denis Charlebois
Secretary of the Commission