



December 18, 2012

Mayor Ralph Drew  
Village of Belcarra  
4084 Bedwell Bay Road  
Belcarra, BC V3H 4P8

Your Worship,

Thank you for your letter of September 17, 2012 regarding Kinder Morgan Canada's emergency response plans related to oil spills in Burrard Inlet, and your subsequent letter of November 26, 2012 outlining your concerns about Westridge Terminal being located in a fault zone and the possible impacts in the event of an earthquake.

I apologize for the time it has taken to respond to your original letter. I understand that we did not receive the original and want to thank you for forwarding it so we could address your questions and concerns.

## **OIL SPILL EMERGENCY RESPONSE PLANS**

The current emergency response capacity around oil spills in Burrard Inlet meets or exceeds all regulatory requirements established by Transport Canada, the National Energy Board and other agencies. However as part of the work being undertaken for our proposed expansion project, we are identifying and exploring enhancements that would complement the increase in tanker traffic that will result if the project is approved.

In response to the questions raised in your first letter:

- 1) How will Kinder Morgan enhance oil spill emergency response procedures to ensure a seamless single-focus responsibility for land-based operations, loading operations, and transport operations?**

Today, a seamless focus to spill response comes from the emergency response training of Kinder Morgan Canada personnel and our working relationships with first responders. On land, we work closely with first response organizations in the communities we operate. As

part of our public awareness programs, we provide training to first responders and invite them to our regular emergency response exercises. On water, we have close working relationships with those who work, operate and regulate marine activity in Burrard Inlet. To ensure that our people lead and can work effectively in a multi-agency response effort, our employees are trained and regularly practiced in the Incident Command Structure (ICS). ICS is a system for emergency management designed to ensure seamless single focus especially in response efforts that require a multi-agency response.

We will continue to build on our existing operating procedures, emergency plans, and relationships with land and marine based response agencies. We will seek opportunities to augment the coordination of emergency response, including the concept of establishing a permanent multi-agency Incident Command Post for spill response; you raised this at our recent Belcarra Information Session. While such a facility would require support from the other agencies involved, should there be interest in the Post, it is an initiative Kinder Morgan Canada is in a position to develop as part of the proposed expansion project.

In addition, we have been in regular contact with the British Columbia government as they develop their plans to respond to broad concerns regarding land and marine incident response capabilities and coordination. We have willingly volunteered to work with government and all affected parties as they work towards developing their plans and study work.

**2) How will Kinder Morgan enhance oil spill containment protocols to ensure effective containment of oil spilled into Burrard Inlet to prevent the containment problems encountered in the 2007 spill?**

The release of oil into Burrard inlet in 2007 was the result of an excavation contractor puncturing our pipeline on Inlet Drive. Some of the oil released from this incident traveled overland and reached the inlet via the discharge of the storm sewer system.

Loading operations at Westridge Terminal are conducted within a precautionary boom and with trained operations personnel on-hand to ensure an immediate response. In contrast, response to the Inlet Drive incident required deployment of boom to contain oil released from the normally unprotected storm sewer outfalls. This deployment was accomplished by Western Canada Marine Response Corporation (WCMRC) within one hour of the first warning of the incident, and within 20 minutes of the first oil observed in the water. While no release is acceptable, we believe the actions taken and equipment used by WCMRC were effective at containing the damage caused by the spill.

As part of securing a tanker at Westridge, it is enclosed within a boom which remains in place throughout the loading operation and until the vessel is cast-off for departure. As a further precaution, a secondary boom is kept in the water ready for deployment by Kinder Morgan Canada operators to double the containment around the terminal in the event of a spill. In an emergency, this secondary boom will be deployed by Kinder Morgan Canada's boat or by the WCMRC skimming vessel; both are kept nearby at the Westridge utility dock. In addition to these precautions, and like the response to the Inlet Drive incident, additional WCMRC resources are staged nearby in the harbour ready for deployment.

Preliminary designs of the proposed expanded Westridge facility are underway. As part of the design for the new facility, we will also be reviewing all of the associated operating procedures to ensure leading practices are adopted for all aspects of the operation, especially safety and emergency response. In particular, we will review the design and best practices for deployment of the precautionary boom system to ensure the most effective system is utilized. This review will also include consideration of the double boom system you recently suggested.

In addition, Kinder Morgan Canada is working closely with WCMRC and Transport Canada to ensure that their existing capabilities are augmented to reflect the increase in tanker traffic that will result if our expansion proceeds. Among the efforts underway at this time are the completion of geographic response plans and an exercise to benchmark WCMRC against other world class spill response organizations. The geographic response plans will provide geographically specific pre-plans to protect sensitive areas identified by the Province including those in Burrard Inlet. The results of the benchmarking exercise will help determine opportunities for further investment in spill response capability and will likely help inform the Provincial government and an anticipated Federal review of the current spill response regime in Canada as recommended in the Provincial Government.

- 3) **How will Kinder Morgan establish a meaningful maximum time for emergency response to oil spills in Burrard Inlet to minimize impacts resulting from lengthy response times,**  
and;
- 4) **What does Kinder Morgan consider to be an acceptable maximum time for emergency response to oil spills in Burrard Inlet?**

Our expectations are that any spill will be responded to immediately. We are prepared for spills and are compliant with all applicable regulations. Response times for marine spills are established under the Canada Shipping Act and administered by Transport Canada, which has the oversight of both Kinder Morgan Canada's Westridge Terminal and WCMRC.

With respect to loading, in the event of a spill, the Canada Shipping Act requires the Terminal operator to immediately implement their oil pollution emergency plan and respond.

To ensure Kinder Morgan Canada is able to respond immediately to an incident, our employees are fully trained and conduct regular exercises based on our Emergency Response Plan for Westridge; a copy of which was provided last June to the region's Port Cities Committee.

In addition to trained employees at the Terminal, Kinder Morgan Canada also employs an experienced Loading Master. This individual has extensive experience with tanker operations. In addition to pre-screening and inspecting the vessels before they arrive at our facilities, the Loading Master is on board the vessel throughout the entire loading to monitor the ship's systems and crew and to ensure the operation is conducted safely. As the ship's side of the ship-to-shore communication, the Loading Master ensures quick and effective communication between the Terminal and the ship. With command experience and familiarity with tanker operations, the Loading Master provides additional oversight to ensure safe operations on board the vessel. In the event of an incident the Loading Master is positioned to augment the capabilities of the officers and crew and ensure a coordinated response is implemented immediately.

The role of the Loading Master in our operations exceeds regulatory requirements and common industry practice. As we develop plans for the expanded Terminal we will continue to employ strategies such as this to ensure safe operation of the Terminal.

## **WESTRIDGE TERMINAL & SEISMIC RISK**

Dr. Alex Baumgard, a Senior Geotechnical Engineer with BGC Engineering, is leading a team providing geotechnical expertise on the Trans Mountain Expansion Project. Dr. Baumgard is collating data on the Westridge region and expects to have gathered and reviewed the related literature shortly. At that time he would like the opportunity to meet with you and share the findings of his review.

Information about Kinder Morgan Canada's current Geohazard Management Program, including seismic safety, has been prepared by Dr. Baumgard and is available online at [www.transmountain.com/seismic-safety-measures](http://www.transmountain.com/seismic-safety-measures).

As with all organizations with infrastructure susceptible to seismically triggered geohazards, Kinder Morgan Canada's commitment to reduce the earthquake risks to the existing Trans Mountain Pipeline is on-going and includes several investigations and major construction mitigation measures.

---

Trans Mountain Expansion Project

✉ **Email:** [info@transmountain.com](mailto:info@transmountain.com) | ☎ **Phone:** 1.866.514.6700 | 🌐 **Website:** [www.transmountain.com](http://www.transmountain.com)

---

Further seismic assessments along the proposed Trans Mountain Expansion Project corridor and existing Trans Mountain Pipeline will consider and address site specific:

- Assessment of seismically induced ground deformation;
- Evaluations for seismically induced landslide potential; and
- Assessment of seismically induced ground shaking.

Once Dr. Baumgard has completed his historical review, Lexa Hobenshield will be in touch to request a meeting with you to share the findings. In the interim, to discuss this or any other area of interest related to the Trans Mountain Expansion Project, Lexa can be reached at 604.268.3013 or [lexa\\_hobenshield@kindermorgan.com](mailto:lexa_hobenshield@kindermorgan.com).

I trust this letter addresses the substance of your concerns. We have more work to do as we proceed with our proposed expansion, and we look forward to continuing our discussion with the Village of Belcarra, including the sharing of more information, as we move forward.

Sincerely,



Ian Anderson  
President, Kinder Morgan Canada

cc: Lexa Hobenshield