



Trans Mountain Expansion Project

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October 20, 2013

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

Dear Mayor Drew,

Thank you for your letter of July 29, 2013 requesting additional information about post mortem assessments of the 2007 Third Party Strike to our pipeline resulting in the Inlet Drive release.

Applying lessons learned as part of continuous improvement is a critical part of any emergency response. After the 2007 Inlet Drive Oil Spill, several post-incident reviews were completed:

Transportation Safety Board (TSB)

The TSB completed a review of the incident, determined findings and summarized safety actions taken. Findings from the report are outlined in this letter below. The review is available on the TSB's website at <http://www.tsb.gc.ca/eng/rapports-reports/pipeline/2007/p07h0040/p07h0040.pdf>:

National Energy Board (NEB)

In response to this incident, the NEB took the following actions:

1. Sessions were organized for all those who took part in the emergency response and the post-remediation monitoring and clean-up to discuss what worked and what did not, and to discuss enhancements to future emergency responses.
2. A multi-agency stakeholder group was established with the NEB as lead agency to share information during site remediation work.
3. An audit of Kinder Morgan Canada's (KMC's) integrity programs including our damage prevention program took place in early 2009.

KMC fully participated in these sessions. As the review was led by the NEB, any request for information would need to be directed to them. The NEB can be reached at 1.800.899.1265 or info@neb-one.gc.ca.

Kinder Morgan Canada (KMC)

KMC completed its own review of the incident. Key outcomes from our review and other important emergency response developments are provided below:

1. Pipeline Protection Department

In 2008, KMC implemented a pipeline protection department whose sole responsibility is to protect the pipeline and facilities. This department's responsibilities include:

- Public awareness
- Pipeline and associated facilities markings
- Issuing permits for safe work around pipeline and associated facilities
- Responds to BC and AB One Calls
- Aerial and ground patrols

2. Collection of Benchmark Data

One of the steps taken since this incident has been to collect environmental data important to any future emergency response in Burrard Inlet. As part of the long-term monitoring program, changes to level of contaminants were assessed in the marine environment, including the evaluation of potential effects on marine organisms.

3. Non Mechanical Spill Response Techniques Pre-approvals

Earlier this year (2013), KMC made a submission to the Federal Expert Tanker Safety Panel; the full report can be found at http://www.transmountain.com/uploads/pages/1373407780-TransMountain_Submission-to-the-Tanker-Safety-Expert-Panel_June-21--2013.pdf. As part of this submission, KMC requested the Panel consider recommending conditional pre-approvals of non mechanical marine spill response techniques. These techniques include use of dispersants and beach cleaning agents, as well as in-situ burning. Such pre-approval would ensure that these techniques could be employed quickly when they are deemed appropriate to minimize environmental harm.

Western Canada Marine Response Corporation (WCMRC)

As you are aware, WCMRC is the marine spill response organization certified by Transport Canada to meet the requirements of the Canada Shipping Act. The Act requires all large vessels and oil handling facilities to have an arrangement for spill response as a condition of operating in Canadian waters.

WCMRC also provides response services on contract to KMC; which was the case for the Inlet Drive spill.

The Inlet Drive spill was not a ship or terminal based spill. Rather, it was a land based spill that reached Burrard inlet through a number of pathways, primarily storm drains. These pathways were not all obvious in the early stages of the response. Some sources were from the shoreline while others were from storm drain outfalls on the ocean floor.

WCMRC conducted its own post-incident review following the spill. KMC is not aware of any findings that indicate that the booms used during the 2007 event were inappropriate for the water or shoreline conditions. While some oil eluded capture early in the response primarily because of the nature and diversity of the pathways and some oil did escape the booms during operation, aerial photographs taken during the response show that the booms were effective in containing the majority of the oil.

It is unfortunate if the strategy for dealing with fugitive oil may have appeared uncoordinated when it was in fact structured and managed through an Incident Command System response organization. Air flights were conducted daily to seek and track fugitive oil and teams were dispatched to assess affected shorelines. Their recommendations formed the basis for daily incident action plans for both the water and shoreline clean up teams.

In addition to conducting post incident reviews, WCMRC conducts benchmarking with other organizations and continually monitors the industry to identify best practices and equipment innovations. We understand that WCMRC has offered to provide a tour of their operations and an introduction to their organization for the Belcarra Mayor and Council. We believe this would be an effective way to understand their capabilities and ask questions.

Further Improvements

As part of the work and studies being undertaken for the proposed Trans Mountain Expansion Project KMC is updating and enhancing the Shoreline Cleanup and Assessment Technique (SCAT) information gathered during the Inlet Drive spill. This information will be incorporated into Trans Mountain's Emergency Response Plans and provided to WCMRC. WCMRC will use the information as part of a demonstration project for a new Geographic Information System (GIS) for Geographic Response plans. Building on existing geographic plans and information maintained by WCMRC, this system will use the area surrounding Belcarra to demonstrate a larger system proposed for the Salish Sea. Use of a dedicated GIS system is a best practice identified in other jurisdictions. KMC is providing SCAT information and other resources to develop a more effective system in BC.

In response to concerns identified through our public engagement for the proposed expansion project, KMC is working with WCMRC to identify enhancements to the existing spill response capacity mandated by Transport Canada. Through our engagement we have heard concern for both response capacity and response times; and as part of our NEB application for the proposed expansion project (anticipated to be filed in late 2013) we are developing a plan to address these and other issues that may arise from the provincial or federal reviews on tanker safety.

I trust this information is helpful. Please contact Lexa Hobenshield at 604.809.9869 or lexa_hobenshield@kindermorgan.com should you wish to discuss further.

Sincerely,

ORIGINAL SIGNED BY

Michael Davies

.cc Kevin Gardner, WCMRC
Lexa Hobenshield, Trans Mountain Expansion Project