

## **SUMMARY OF COMMENTS/RECOMMENDATIONS**

**PROPOSER:** Manitoba Hydro  
**PROPOSAL NAME:** Morris Natural Gas Pipeline Project

**CLASS OF DEVELOPMENT:** Two  
**TYPE OF DEVELOPMENT:** Transportation and Transmission - Pipelines

**CLIENT FILE NO.:** 5649.00

### **OVERVIEW:**

The Proposal was received on May 3, 2013. It was dated May 6, 2013. The advertisement of the proposal was as follows:

“Manitoba Hydro has filed an Environment Act Proposal for the construction and operation of a 14.5 km long 100 mm natural gas pipeline between the communities of Letellier and St. Jean. The pipeline would be located parallel to an existing 75 mm pipeline on easement along the west side of a municipal road west of PTH 75, and would connect to existing pipelines at both ends. A small above grade valve assembly would be located at the south end of the new pipeline at PR 201, and two existing above grade valve assemblies in the vicinity of the north end of the new pipeline would be removed. The pipeline would be installed by trenching during the summer of 2013.”

The Proposal was advertised in the Emerson Southeast Journal on Saturday, June 1, 2013, and in the Altona Red River Valley Echo on Thursday, June 6, 2013. It was placed in the online public registry, the Legislative Library, Eco-Network, Millennium Public Library (Winnipeg) and South Central Regional Library (Morden) public registries. The Proposal was distributed to TAC members on May 30, 2013. The closing date for comments from members of the public and TAC members was July 3, 2013.

### **COMMENTS FROM THE PUBLIC:**

No public comments were received.

**COMMENTS FROM THE TECHNICAL ADVISORY COMMITTEE:****Manitoba Conservation and Water Stewardship – Environmental Compliance and Enforcement Branch**

As a result of the closeness of the project area to water channels, there may be potential for sediment transfer to surface water. Care must be taking to minimize this.

No other concerns with the proposal.

Disposition:

This comment can be addressed through a licence condition.

**Manitoba Conservation and Water Stewardship – Environmental Programs and Strategies Branch, Air Quality Management Section**

Air Quality Section has reviewed the above EA proposal and potential air quality concerns are adequately addressed. No significant impact on air quality is expected provided that the measures cited in the proposal are implemented.

**Manitoba Conservation and Water Stewardship – Watersheds and Protected Areas Branch and Lands Branch**

No concerns.

**Manitoba Conservation and Water Stewardship – Wildlife Branch**

Wildlife branch has no concerns, however our comment is that their survey date of April 20 is not an appropriate survey time for plants and most other wildlife species.

**Manitoba Conservation and Water Stewardship – Water Science and Management Branch, Water Quality Management Section**

Given there appears to be no water crossings and the pipeline will traverse developed agricultural land I have no substantive comments with respect to water quality. One general comment would be that hydrostatic testing of pipelines shall be performed in a manner acceptable to the department.

Disposition:

This comment can be addressed through a licence condition.

**Manitoba Conservation and Water Stewardship – Water Science and Management Branch, Groundwater Management Section**

I have reviewed the submission for a gas pipeline. The area is underlain by a thick unit of clay and the underlying carbonate aquifer is salty. According to our records there are two, possibly active wells located near St. Jean Baptiste that are within the study area. They are located on River Lots 225 and 237. The Proponent should contact the owners to determine if they are still active.

Given the clay substrate, lack of potable aquifer, lack of wells in the area, and since the pipeline will not be carrying liquids, I have no further concerns at this time.

Disposition:

The information concerning wells will be forwarded to the proponent for information.

**Manitoba Conservation and Water Stewardship – Fisheries Branch**

We do have a concern with the proponent's interpretation of a watercourse. They have indicated not crossing any watercourses but they will be crossing a Water Control Work 3<sup>rd</sup> Order Drain. In looking at the aerial of the area while the water control work drain may be created it was done so to provide a route for water that would naturally have been facilitated through the many natural surface watercourses which were removed to accommodate agricultural. I don't believe we differentiate between watercourses and drains and in fact under the Water Protection Act a water body is defined as:

“any body of flowing or standing water, **whether naturally or artificially created**, and whether the flow or presence of water is continuous, intermittent or occurs only during a flood, including but not limited to a lake, river, creek, stream, slough, marsh, swamp and wetland, including ice on any of them. (« plan d'eau »)

Unless there is some other interpretation provided that differentiates drains from watercourses, and I'd appreciate knowing this, please ensure that all surface waters are recognized and treated in proposals as watercourses.

As it stands given the proponents plan on directionally drilling the pipeline at that crossing along with the other measures identified in the proposal any potential concerns should be addressed. We would recommend the inclusion of the following in the licence:

1. The Licencee shall construct waterway crossings by augering, tunneling, or boring in accordance with the Department of Fisheries and Oceans High Pressure Directional Drilling Operational Statement.  
We have asked that following this clause there be a clause which indicates regional fisheries staff must be contacted if any change to crossing method is required.

2. Respecting the riparian area we would request a clause that requires work, to the extent possible, be conducted outside the 30 m mark from the high water mark of 3<sup>rd</sup> order and higher rivers and lakes.
3. Respecting the potential to introduce or spread invasive species (inclusive of both terrestrial and aquatic) the following has been included in the licence for the Manitoba Hydro St. Francois Xavier Natural Gas Transmission Pipeline:

The Licencee shall, during construction and maintenance of the Development, prevent the introduction and spread of foreign aquatic and terrestrial biota by ensuring all equipment, including transport equipment, is clean before use at each location.

4. A clause that requests the implementation of erosion and sediment control measures, where there is the potential for sediment to enter surface water, during and after until the site has stabilized.
5. A clause that addresses the release of water used in hydrostatic testing in terms of not being release directly to surface water and meeting parameters as recommended by Water Science Management.

Disposition:

These comments can be addressed through licence conditions.

### **Manitoba Conservation and Water Stewardship – Water Use Licensing**

No concerns.

### **Manitoba Conservation and Water Stewardship – Water Control Works and Drainage Licensing**

No concerns.

### **Manitoba Conservation and Water Stewardship – Office of Drinking Water**

The only concern I have with this work is that it is in proximity to the Red River south of Morris and the Red River is the raw water source for the Morris Regional Water Treatment Plant. While it is unlikely, it is possible that residue from a major spill of fuel or something similar could drain or wash into the river and cause issues for the Morris water plant. I would therefore recommend that contact information for the Morris water plant be included in the contingency plans for the project with instructions that, in the event of any spill from the project entering the river, the operator at the Morris water plant be contacted.

Beyond this point, I see no other potential concerns with the project from a public water safety viewpoint.

Disposition:

This comment will be provided to the proponent for information.

**Manitoba Infrastructure and Transportation - Highway Planning and Design Branch, Environmental Services Section**

No concerns.

**Manitoba Agriculture, Food and Rural Initiatives**

As the pipeline will not interfere with agricultural operations, and has been reviewed by the landowners and community, MAFRI has no concerns with this proposal.

**Manitoba Family Services and Labour - Office of the Fire Commissioner**

No comments or concerns.

**ADDITIONAL INFORMATION:**

No additional information was required to address Technical Advisory Committee comments.

**PUBLIC HEARING:**

As no public comments were received and no requests for a hearing were filed, a public hearing is not recommended.

**CROWN-ABORIGINAL CONSULTATION:**

The Government of Manitoba recognizes it has a duty to consult in a meaningful way with First Nations, Métis communities and other Aboriginal communities when any proposed provincial law, regulation, decision or action may infringe upon or adversely affect the exercise of a treaty or Aboriginal right of that First Nation, Métis community or other Aboriginal community.

The proposal involves the installation of 14.5 km of 100 mm buried pipeline on easement through cropped agricultural land and developed road allowances parallel to an

existing gas pipeline. Since resource use is not affected by the project, it is concluded that Crown-Aboriginal consultation is not required for the project.

**RECOMMENDATION:**

It is recommended that the Development be licensed under *The Environment Act* subject to the limits, terms and conditions as described on the attached draft Environment Act Licence. It is further recommended that enforcement of the Licence be assigned to the Red River Regional office of the Environmental Compliance and Enforcement Branch.

**PREPARED BY:**

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