



Indian Oil and Gas Canada (IOGC) Pipeline Environmental Audit Requirements

For IOGC Environmental Audit preparation and submission instructions please refer to the *IOGC Environmental Audit Submission Instructions and Coversheet* located on IOGC's website (www.iogc.ca).

Lessees are requested to make every effort possible to locate the IOGC Environmental Protection Terms Letter (Terms Letter) prior to contacting IOGC to request a copy. The Terms Letter is appended to the Right-of-Way (RW) Agreement.

Note: Pipeline riser sites are not required to be included in a pipeline Environmental Audit as they have separate Surface Lease Environmental Audit Requirements.

First year Environmental Audits should include sections **A-F**.

Subsequent year Environmental Audits should include sections **B-F**.

IOGC File #: RW-	Legal Location:	to
Reserve Name and #:		Province:

A - First Year (ONLY) Environmental Audit Requirements

1.	If an Environmental Monitor was required as per Terms Letter, provide the name and company of the Environmental Monitor. Include any field notes, issues that arose, recommendations or reports (e.g. as-built) prepared by the Environmental Monitor. Include information such as: • a discussion on construction-related terms; • confirmation of appropriate soil handling measures (i.e. maintenance of 1 m soil separation, whether the fill was compacted); • confirmation that the dates the RW was constructed are consistent with the timing restrictions outlined in the Terms Letter; • a discussion on whether any species at risk or migratory birds were observed and whether appropriate setbacks were maintained; and/or • if required, confirmation that appropriate federal departments were notified and proper authorizations and/or permits were obtained (e.g. Department of Fisheries and Oceans Authorization).
2.	Provide the name of the First Nations Liaison/Monitor and include any field notes, issues, recommendations or reports prepared by the First Nations Liaison/Monitor. For example, identify whether any cultural sites were found and whether appropriate setbacks were maintained.

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3.	Identify whether a pre- or post-construction wildlife or vegetation survey was required, as per Terms Letter. Confirm that the necessary information was forwarded to the First Nation and IOGC (e.g. provide title of report and date submitted to IOGC).
4.	Identify any additional or alternative mitigative measures undertaken during RW construction, installation, backfill and/or reclamation. For example, describe whether it was ploughed-in rather than trenched.
5.	Describe any alterations to fences (i.e. cuts, repairs or re-routing) and/or installation of new gates.
6.	If applicable, describe the timber management undertaken by the Lessee (i.e. salvage, rollback, burning, distribution of salvage, salvage or cut and rolled back of leaning or scarred trees, notification of location of log decks to First Nation, when will decked timber be removed etc.). Provide proposed timeline for removal of log decks.
7.	Describe the RW contouring and confirm that it conforms to the surrounding landscape. Include details such as whether the contouring ensures: • stability; • limits wind and water erosion; and • provides adequate surface drainage. If the soil replacement and contouring has not occurred, provide proposed timeline for completion.
8.	Describe the progressive reclamation and interim clean-up and confirm it is acceptable for the age/status of the RW. Describe: • whether Certificates of Seed Analysis were obtained and reviewed; • whether the reclaimed areas are naturally re-vegetating, seeded with an approved native seed mix, or seeded with a Certified Number 1 agronomic seed; and • whether the vegetation along the RW conforms to surrounding landscape such as appropriate species composition, bare areas, height, health vigor, pod size, weight (for cropland); and • the overall state of the revegetation efforts.
9.	Describe the condition of watercourse crossings. Include whether: • any pipe is exposed in the stream bed or has floated to surface in wet areas; • temporary vehicle crossings have been removed; • bed and banks are stable and appropriate erosion control mechanisms are in place; • sediment is entering a fish-bearing waterbody; • any remediation actions that were undertaken.
10.	Confirm that all construction equipment, materials and waste (extra barrels, packaging, debris, survey flags, etc.) have been removed and cleared from the RW.

B - Vegetation Monitoring and Management Requirements

11.	Identify and list any weeds including their provincial weed designation as defined under provincial regulations. Describe whether they are located on or off the RW, the size of patch, if there is weed encroachment from surrounding areas, and percentage of the overall vegetation
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	on the RW.
12.	Describe the Lessee's Weed Monitoring and Management Plan. Include the following information: • approach for implementation; • compliance with provincial standards and requirements; • mechanical weed control strategies including on-going inspections (minimum two times per year during the growing season).
13.	Identify whether there is any stressed vegetation or isolated bare spots on or off the RW. If observed, identify the suspected cause and what actions are being taken to rectify the issue.
14.	Identify any barriers to wildlife movement or hazards to wildlife or livestock and describe measures or actions undertaken.

C - General Housekeeping Requirements

General

15.	Describe the surrounding land use (cultivated, improved pasture, pasture, forest, native prairie, muskeg, etc).
16.	Describe whether the pipeline is active or abandoned. If abandoned, describe details and timing of reclamation, surrender and/or remediation plans.
17.	Identify whether there is any unused equipment, supplies, felled trees/log decks, garbage and/or debris that should be removed from the RW.
18.	List any complaints that have been reported, investigated and follow-up actions taken.

Topography/Surface Drainage

19.	Describe the surface drainage along the RW (e.g. whether the RW has impeded any surface drainage).
20.	Identify whether there is any evidence of soil erosion or erosion control measures being used. Describe any areas that require attention and the effectiveness of erosion control measures (if they are being used).
21.	Identify any evidence of ground subsidence (trench depressions below ground level or soil compaction). If so, provide details of follow-up actions taken.
22.	Identify any evidence of roaches (soil mound over the trench) or exposed pipe along the route. If roaches are present, identify whether it impedes surface drainage. If so, provide details of follow-up actions taken.

Water Features and Waterbodies

23.	Identify waterbodies or low wet areas (e.g. slough) within 100m of the RW, its distance and
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	approximate size. Describe buffer or riparian area and the mitigation measures in place to prevent erosion and/or a potential spill from reaching the waterbody/ low area.
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D - Environmental Protection and Safety Requirements

Access and Security

24.	Confirm that the RW has signage compliant with provincial regulations at all road and water crossings (location, appropriate warning symbols, visible in all seasons, legible, 1-800/24 hour emergency contact number, etc.).
25.	Describe efforts made to minimize the risk of fire along the route (e.g. vegetation control, eliminating nearby sources of ignition, etc.)

Spill Prevention, Response and Reporting and Complaints

26.	List any reportable spills that have occurred by date. Confirm that IOGC and the First Nation were forwarded a copy of the Spill Report for any reportable spill. If not, include a copy.
27.	Identify any signs of contamination on or off the RW. Identify the source, clean-up strategy and mitigative measures to prevent further contamination.

Emergency Response Plan (ERP)

28.	Identify when the pipeline is covered by an ERP. If so, identify when it was last updated.
29.	With respect to a site-specific ERP (H ₂ S sites/pipelines), identify when the tabletop or major exercise was last conducted. Describe whether the exercise took place on-Reserve and whether it involved First Nation Authorities.

E - Overall/Summary Environmental Audit Requirements

30.	Confirm that the entire RW has been included in the Environmental Audit.
31.	Confirm compliance with IOGC Environmental Protection Terms Letter ¹ (also included in Appendix). Identify by number, any Terms not in compliance and steps taken to bring it into compliance.
32.	Confirm compliance with other applicable provincial and federal Acts, Regulations, Directives, Guidelines, and Information Letters pertaining to upstream pipelines not specifically described in previous requirements.
33.	Provide a summary statement of the compliance or non-compliance of the RW. Include professional sign-off confirming that the Environmental Audit has been conducted by an independent Environmental Professional².

¹ Lessees are requested to make every effort possible to locate the IOGC Environmental Protection Terms Letter (it is appended to the Right-of- Way (RW) Agreement) prior to contacting IOGC to request a copy.

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34.	In the event that the RW is non-compliant, the Lessee is encouraged to bring the RW into compliance prior to submission of the final Environmental Audit report.
35.	Provide a summary of any non-compliance issue(s) and describe how and when non-compliance issue(s) are to be addressed . If non-compliance issues have been addressed after the completion of the Environmental Audit but prior to submission, attach evidence of compliance (i.e. report of corrective action taken with photo documentation) with Environmental Audit submission.

F - Environmental Audit Attachment Requirements

I. Copy of the IOGC Environmental Protection Terms Letter

II. Site Sketch or Map

Include sketch or map indicating the location the RW, any associated surface facilities that it connects to (wellheads, pipeline risers), topsoil piles, low areas, areas where there is ground subsidence, roaches and/or soil compaction, areas where surface water ponds, and/or equipment, debris, etc.

Include distance scale, North orientation arrow, topological features, water features, vegetation including weeds, surrounding residences, or other features of importance.

III. Site Photos

The Audit must include captioned colour photographs. The location where the photographs were taken and the direction of the photographs should be included on a map or diagram.

Include photos of the entire RW.

I. Follow-up Compliance Reporting

For sites that had non-compliance issues, include a report of corrective action taken with photo documentation.

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²A professional is identified as an individual who possesses a post-secondary degree in biological, environmental, or natural resource sciences from an accredited college or university, or a technical diploma in biological, environmental, or natural resource sciences from an accredited college, or educational equivalencies; has technical knowledge and experience in the assessment of vegetation, wildlife, soils and/or hydrology; and is acting within his/her area of expertise.

Work completed in Alberta, British Columbia or Saskatchewan should be completed by an assessor who is a registered member in good standing of a regulated professional association constituted under an act of the provincial Legislature or the assessor's work is reviewed by a member of a regulated professional association.