

National Energy
Board



Office national
de l'énergie

DECISION

File OF-Fac-Oil-T260-2013-03 15

1 March 2018

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Dear Mr. Javier and Mrs. Annemarie Sarango, Mr. Carter, Mr. Stoness, Mr. Denstedt, and Ms. Oleniuk:

**Trans Mountain Pipeline ULC (Trans Mountain)
Trans Mountain Expansion Project – Certificate OC-064
Decision for Detailed Route Hearing MH-026-2017
Mr. Javier Sarango and Mrs. Annemarie Sarango**

1. Background

On 19 May 2016, the National Energy Board (NEB or Board) issued its Report recommending that Governor in Council approve the Trans Mountain Expansion Project (TMEP), subject to 157 conditions ([A77045](#)).

The TMEP included twinning the existing 1,147 kilometre-long Trans Mountain Pipeline (TMPL) system in Alberta (AB) and British Columbia (BC) with approximately 981 kilometres of new buried pipeline; new and modified facilities, such as pump stations; additional tanker loading facilities at the Westridge Marine Terminal in Burnaby; and reactivating 193 kilometres of existing pipeline between Edmonton and Burnaby. Trans Mountain requested approval of a 150 metre-wide corridor for the TMEP pipeline's general route.

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On 29 November 2016, Governor in Council directed the Board to issue Certificate of Public Convenience and Necessity (Certificate) OC-064 ([A80871](#)), the effect of which was to approve the TMEP, including the 150 metre-wide corridor.

On 17 and 24 February 2017, Trans Mountain applied to the Board for its detailed route, submitting the Plan, Profile, and Book of Reference (PPBoR) for Segments 1 and 2 of the TMEP. Under section 34 of the *National Energy Board Act* (NEB Act), Trans Mountain made available for public viewing copies of its PPBoR, served notices on owners of lands proposed to be acquired for the proposed detailed route,¹ and published notices in newspapers in the vicinity of the proposed detailed route.²

In all detailed route hearings, the Board considers the following issues:

1. the best possible detailed route of the pipeline;
2. the most appropriate method of constructing the pipeline; and
3. the most appropriate timing of constructing the pipeline.

In its 31 August 2017 Letter of Decision ([A85762](#)), the Board stated that it would not consider the issue of compensation to be paid to landowners as that matter is not within its jurisdiction.

2. Detailed Route Hearing MH-026-2017

Mr. Javier Sarango and Mrs. Annemarie Sarango are the registered owners of lands located at SW-12-53-2 W5M, Lot 8, Block 4, Plan 7620086 in the Rural Municipality of Parkland County, AB. The property is shown on PPBoR: M002-PM03006-011 and in Figure 1.³ Trans Mountain identified this land as ADJ: Tract 60. Mr. and Mrs. Sarango reside on these lands. The Sarango lands are proposed to be used for temporary workspace for constructing the new TMEP pipeline in Segment 2.

Mr. and Mrs. Sarango filed their statement of opposition ([A82453](#)) with the Board on 5 April 2017. On 31 August 2017, the Board issued its Letter of Decision granting detailed route hearings in relation to Segment 1 and Segment 2. The Board granted a hearing to Mr. and Mrs. Sarango and issued Hearing Order MH-026-2017 on 31 August 2017. The Hearing Order set a November-December 2017 timeframe for the hearing to occur with details to follow in a procedural update.

A request for a site visit of Mr. and Mrs. Sarango's lands was filed with the Board ([A87152](#)) on 24 October 2017. In Ruling No. 4 ([A87818](#)), issued on 15 November 2017, the Board set out its decision as to which properties would have a site visit in Segment 1 and Segment 2. The Board did not grant a site visit for the Sarango lands.

¹ As required by [paragraph 34\(1\)\(a\)](#) of the NEB Act.

² As required by [paragraph 34\(1\)\(b\)](#) of the NEB Act.

³ The map in Figure 1 was filed by Trans Mountain as part of its evidence for detailed route hearing MH-026-2017 ([A86706](#))

On 20 October 2017, Mr. Darryl Carter, legal counsel for Mr. and Mrs. Sarango, filed a Notice of Motion ([A87089](#)) requesting the Board compel Trans Mountain to provide additional information. The Board dismissed the motion on 31 October 2017, having received comments from Trans Mountain, noting that Trans Mountain had voluntarily provided additional information in response to the motion ([A87403](#)). The Board did extend the deadline for Mr. and Mrs. Sarango to file their written evidence from 31 October 2017 to 7 November 2017.

On 31 October 2017, Mr. Carter filed a letter on behalf of his clients ([A87417](#)) stating that the information provided by Trans Mountain was insufficient. The Board viewed this letter as a new Notice of Motion, and requested comments from Trans Mountain and Mr. Carter on behalf of his clients. On 24 November 2017, the Board issued Ruling No. 5 dismissing the motion ([A88137](#)).

On 27 November 2017, the Board issued a letter ([A88211](#)) to Trans Mountain, and to Mr. Carter, as legal counsel to Mr. and Mrs. Sarango and the three other detailed route hearings noted below. In this letter, the Board was seeking comments in relation to procedural changes proposed for the oral portion of the hearing process for four specific detailed route hearings: MH-019-2017 (Keelan Petterson); MH-017-2017 (Dianne Murray); MH-026-2017 (Javier and Annemarie Sarango); and MH-060-2017 (Victoria Maitland and John Gordon McKay). After receiving comments from Trans Mountain and Mr. Carter, on behalf of his clients, the Board confirmed changes to the hearing process for those four hearings. The Board determined that certain procedural steps would be adopted rather than repeated in three detailed route hearings. The steps that would be adopted were: the delivery of the Board's opening remarks; the registration of appearances; and the adoption of evidence by Trans Mountain that would all be taken in the MH-019-2017 detailed route hearing.

The oral hearing for Mr. and Mrs. Sarango was held on 1 December 2017, in Spruce Grove, AB. Trans Mountain and Mr. Carter, on behalf of Mr. and Mrs. Sarango, adopted the above mentioned procedural steps at the beginning of the hearing.

Trans Mountain presented a panel of witnesses for cross-examination. Mr. and Mrs. Sarango were present. Mr. Carter, their legal counsel, asked questions of Trans Mountain's witness panel and provided argument. Mr. and Mrs. Sarango gave an opening statement and answered questions.

After the detailed route hearing, the Board issued a letter on 23 January 2018 requesting comments on draft possible conditions ([A89465](#)) in relation to two issues, possible damage to the residence and its foundation and the septic system. On 26 January 2018, the Board received comments from Trans Mountain ([A89594](#)), followed by comments from Mr. and Mrs. Sarango on 31 January 2018 ([A89715](#)) and reply comments from Trans Mountain on 2 February 2018 ([A89772](#)).

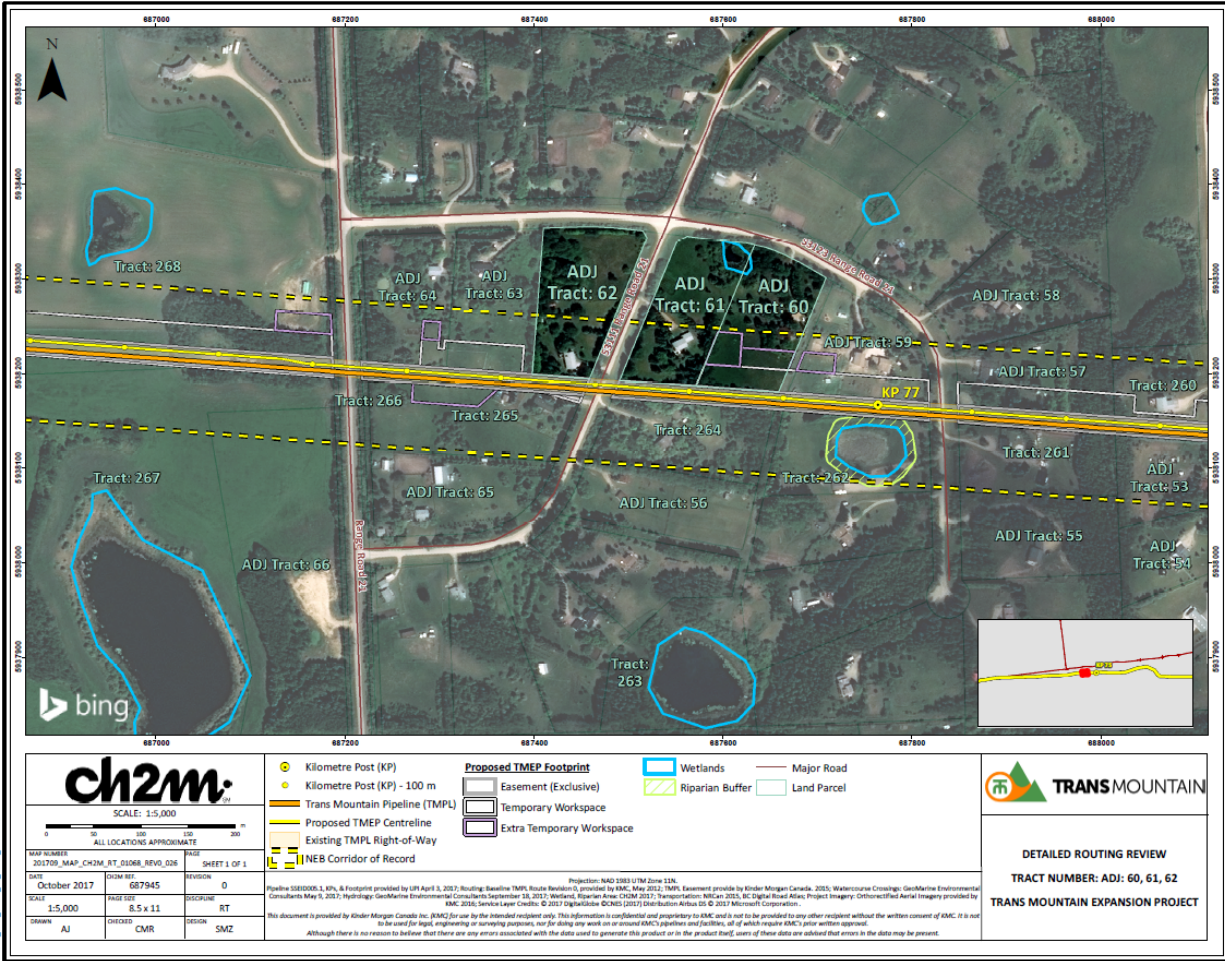


Figure 1 Map of Javier and Annemarie Sarango's property (ADJ Tract: 60)

2.1 Proposed Detailed Route

2.1.1 Trans Mountain's Routing Criteria

In selecting its 150 metre-wide corridor and detailed route for the new TMEP pipeline, Trans Mountain submitted in its written evidence and opening statement at the detailed route hearing that it had established a hierarchy of routing principles. Of the four principles, the highest preferred criteria was, where practicable, to co-locate the new TMEP pipeline on or adjacent to the existing TMPL easement. Trans Mountain used this principle when locating the new TMEP pipeline adjacent to the Sarango lands.

Trans Mountain stated that it had been engaging landowners in its routing discussions since 2012 and used feedback received to optimize the location of its 150 metre-wide corridor. It also stated that the corridor width provided flexibility for minor route adjustments, including those informed by landowner input.

Trans Mountain submitted that construction of this portion of the new TMEP pipeline within the existing TMPL right-of-way is consistent with its routing principles. Trans Mountain further submitted that it will leverage the existing pipeline protection program and landowner knowledge of the location and nature of the existing pipeline to maximize pipeline integrity and safety.

2.1.2 Proposed Detailed Route and the Sarango Lands

The proposed detailed route for the new TMEP pipeline follows the existing TMPL alignment. Trans Mountain proposes to construct the new TMEP pipeline immediately adjacent to the existing TMPL easement. The new TMEP pipeline will be immediately south of the Sarango lands with the north boundary of the easement abutting the southern boundary of the Sarango property. The TMEP easement does not extend onto the Sarango property.

Views of Trans Mountain

Trans Mountain submitted that the Sarango lands are required for temporary workspace due to a proposed nearby bored road crossing. The workspace would be used to store topsoil, excavated material, and staging of prefabricated pipe sections. Since the current grade of the required workspace has an approximate 13-degree side slope, limited excavation associated with stripping and salvage of topsoil is planned to create a level work surface for construction safety. See Figure 2, which is reproduced from Trans Mountain’s reply evidence, for a detailed diagram and explanation of the temporary workspace requirements.

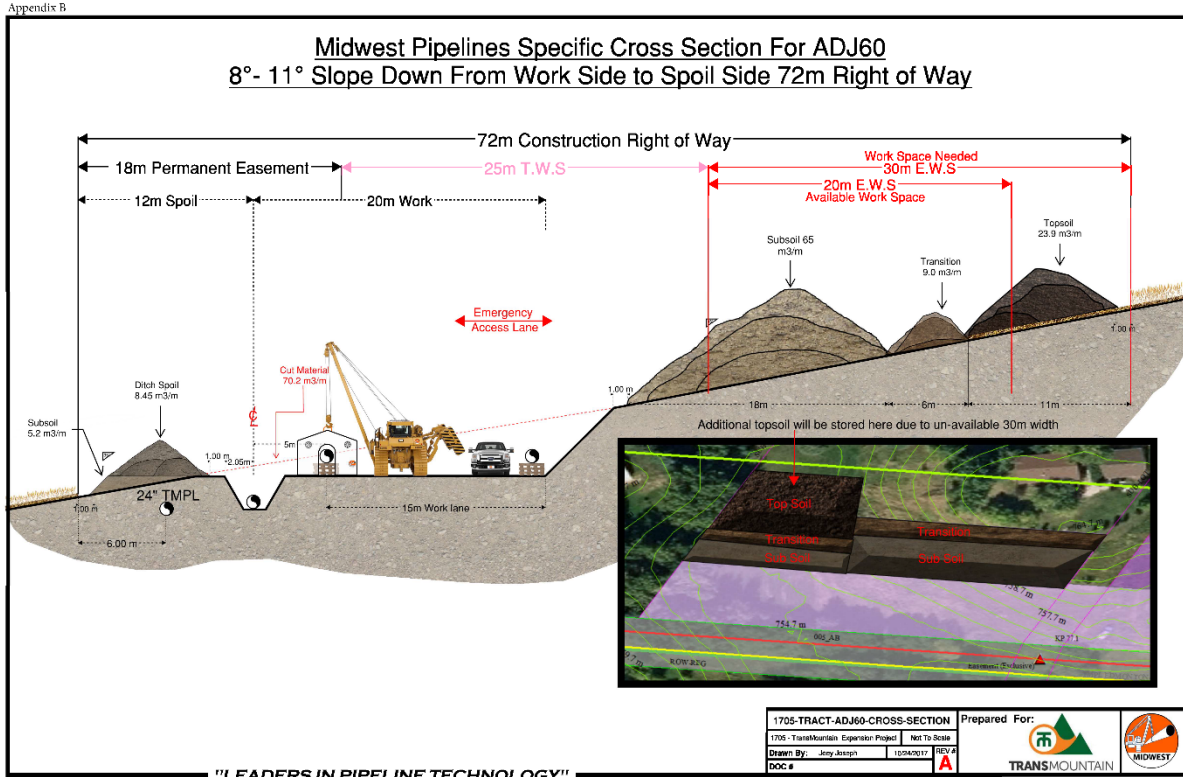


Figure 2 Temporary workspace requirements diagram filed by Trans Mountain in reply evidence (A87768-1)

Trans Mountain stated that the temporary workspace proposed on the Sarango lands was appropriate for its intended use and did not require extensive tree clearing. Trans Mountain also stated that the temporary workspace location was selected since it has fewer trees and is unencumbered by existing infrastructure, relative to nearby lands.

Trans Mountain submitted that it had reviewed and seriously considered Mr. and Mrs. Sarango's opposition and evidence and remains of the view that the proposed route is the best possible route in this area and that the methods of construction are appropriate. It further submitted that the route was consistent with the routing principles and that the proposed route in this case was the most efficient, practical choice, and would minimize impacts overall.

Views of Mr. and Mrs. Sarango

In their statement of opposition, Mr. and Mrs. Sarango stated that they were opposed to the proposed routing due to proximity to their residence, water well, water line, gas line, and septic field.

In their written evidence, Mr. and Mrs. Sarango stated that it would be difficult for them to respond to the proposed use of their property as they were not provided with any specific details from Trans Mountain. The Sarangos expressed concern regarding the location of the new TMEP pipeline being to the north of the existing TMPL and the added risk of having a second pipeline. Mr. and Mrs. Sarango submitted that the temporary workspace requirements were now more than what was originally proposed, and questioned its location given the severe contours of their land. They stated that they do not want any temporary workspace on their property.

During the hearing, Mr. and Mrs. Sarango expressed concerns that vibrations from construction could impact the geological and structural integrity of their land and the foundation of their house. They also expressed concerns with reclamation of the steep slope.

Mr. and Mrs. Sarango stated that Trans Mountain had not done any surveys of their septic field prior to selecting the location of the temporary workspace. At the hearing, they stated that they did not know the boundaries of their septic field, but that they know that it extends down the hill. They stated during the hearing that there is a small leak where there is tall grass growing on the property, but they had not had any problems with the septic field in that area.

Mr. and Mrs. Sarango expressed concerns that their septic field is located in the area where the temporary workspace is proposed, and if Trans Mountain piles soil on top, it would destroy their septic field. They submitted that they are not able to drive a lawn tractor in that area without it sinking into the soft land, and questioned how Trans Mountain will be able to have heavy machinery work in the area.

Mr. and Mrs. Sarango did not provide any evidence that they opposed the timing of construction of the pipeline.

2.2 Methods of Construction

Trans Mountain proposes an approximate 215 metre horizontal drill bore starting immediately south of the Sarango property and ending west of the Maitland-McKay property (MH-060-2017 proceeding). This method of construction will require temporary workspace on the Sarango lands. Another bore is proposed under Range Road 21 further to the east of the Sarango lands.

Trans Mountain submitted that it was proposing to balance the impacts in the localized area and that the 215 metre horizontal drill bore would mitigate impacts to the adjacent Tracts 61 and 62, being the Murray (MH-017-2017 proceeding) and Maitland-McKay (MH-060-2017 proceeding) properties respectively.

Views of Mr. and Mrs. Sarango

Mr. and Mrs. Sarango stated that it is not efficient for Trans Mountain to complete two drills, one on each side of their property, and trench in between the two drills adjacent to their property. The Sarangos stated that the best method of construction would be for Trans Mountain to keep drilling past their land and suggested that a horizontal directional drill method be used to avoid the need for temporary workspace on their property.

Views of Trans Mountain

Trans Mountain stated that a horizontal directional drill would be more complicated technically, would introduce higher risk, would take more time, and would be significantly more expensive than conventional pipeline construction or a horizontal drill bore. Trans Mountain also stated that including the Sarango lands in a horizontal directional drill section would shift the workspace requirements onto the neighbouring landowner.

Trans Mountain submitted that the Sarango lands were not included in the trenchless section in this case, due to the limitations on the extent of a horizontal drill bore. Trans Mountain submitted that the proposed approach is reasonable even though it requires temporary workspace on the Sarango lands.

Trans Mountain stated that it would complete a survey before construction to locate and mark any buried utilities, and attempt to locate and mark the septic field. If there was damage as a result of construction, Trans Mountain would coordinate the repair and/or replace the utilities as soon as possible.

Trans Mountain also stated that it would address damage to the septic field immediately, and would have it examined to make sure it is working prior to construction. Following construction, the septic field would again be examined to determine if any remedial work is required. Trans Mountain noted that issues with the septic fields may not become apparent until later on, and there is a one, three and five year post-construction monitoring program which would serve to deal with damages after construction.

Trans Mountain confirmed it would add Mr. and Mrs. Sarango's water well to its Water Well Inventory⁴ and that the mitigation measures set out in its Groundwater Monitoring Plan⁵ and Environmental Protection Plan⁶ (A86551) would apply to Mr. and Mrs. Sarango's water well. Trans Mountain stated it will involve Environmental Inspectors to ensure measures set out in the Environmental Protection Plan are communicated, complied with, monitored and documented throughout all phases of construction.

3. Board Decision for Detailed Route Hearing MH-026-2017

The Board appreciates the time spent by Mr. and Mrs. Sarango and Trans Mountain in discussing their concerns during this detailed route hearing.

The Board notes that Trans Mountain filed its written evidence on 10 October 2017. Trans Mountain then filed another document entitled "written evidence" on 13 October 2017 which updated an incorrect map that was attached to the 10 October 2017 filing, and corrected the name of Mrs. Sarango. The 13 October 2017 document was filed after the filing deadline set for Trans Mountain's written evidence. The Board did not receive a motion from Trans Mountain for approval to file this 13 October 2017 document as late evidence. Both the 10 October 2017 and 13 October 2017 documents were adopted by Trans Mountain as its evidence at the detailed route hearing. The Board notes there were no objections to the late filing of the 13 October 2017 document from Mr. and Mrs. Sarango. The Board notes one other change in the 13 October 2017 document in paragraph 12 whereby it states that "There are no excavations on this parcel of land other than stripping and salvage of topsoil to prevent admixing with subsoils." The Board accepts the 13 October 2017 as evidence properly filed on the record.

The Board recognizes that matters of pipeline safety, including pipeline integrity and emergency management, are important. However, the Board is of the view that these matters are not for consideration in a detailed route hearing. These matters were assessed in the OH-001-2014 Certificate hearing for the TMEP and were discussed extensively in the NEB Report, specifically in Chapters 6, 7, 8, and 9. Numerous conditions were also imposed by the Board on safety matters.

The Board notes Trans Mountain's commitment to add Mr. and Mrs. Sarango's water well to the Water Well Inventory, implement applicable mitigation measures set out within related plans required under conditions of Certificate OC-064, and to involve an Environmental Inspector who will ensure mitigations measures are complied with. The Board is of the view that this commitment adequately addresses Mr. and Mrs. Sarango's concerns regarding their water well.

⁴ Condition 93 of Certificate OC-064

⁵ Filed as part of Condition 78 of Certificate OC-064

⁶ Condition 78 of Certificate OC-064

The Board notes Mr. and Mrs. Sarango's evidence related to the contours on their property, and their concerns with the potential for construction-related ground movement and vibration which could result in possible damage to their residence and its foundation, located at the top of a slope above the proposed pipeline and temporary workspace. Trans Mountain is required, pursuant to Condition 66 of Certificate OC-064, to file with the Board an updated Risk Management Plan for geohazards to address the threats of existing and potential geohazards, which includes slope instability, during construction. Trans Mountain is also required, pursuant to Condition 147 of Certificate OC-064, to file the results of a baseline natural hazard assessment for TMEP within one year after commencing operations, and for that assessment to be updated at intervals not exceeding 5 years and to be integrated into the Natural Hazard Management Program for Trans Mountain's pipeline system. In the Board's view, the conditions of Certificate OC-064 mentioned above will partially address the Sarangos' concerns about slope stability. Given the contours of Mr. and Mrs. Sarango's property and the location of their septic system, the Board notes that work in the area of the temporary workspace could impact Mr. and Mrs. Sarango's septic system and that some of those impacts may not be immediately apparent.

The Board has carefully considered all the comments received from Mr. and Mrs. Sarango through their legal counsel, and Trans Mountain, on the draft possible conditions in making its decision. The Board is of the view that additional conditions are necessary to mitigate possible damage to Mr. and Mrs. Sarango's residence and its foundation as a result of TMEP construction activities.

The Board notes Trans Mountain made commitments in relation to Mr. and Mrs. Sarango's septic system in its evidence and during the hearing, in particular, that should any inadvertent damage to the septic system occur during construction, Trans Mountain will address the damage immediately, and that it would monitor the septic system as part of the five-year post-construction monitoring program. However, the Board also notes that this monitoring program, which is included as Condition 151 of Certificate OC-064, does not list septic systems as one of the issues that must be monitored and addressed in those reports. The Board is of the view that to provide clarity and to build upon the commitments made, conditions are also required in relation to Mr. and Mrs. Sarango's septic system.

The Board therefore imposes the following two conditions which will be included in any approval of the PPBoR issued by the Board:

Definitions used in Conditions 1 and 2:

Landowner: Mr. and Mrs. Sarango, or subsequent owner(s) of the lands located at SW-12-53-2 W5M, Lot 8, Block 4, Plan 7620086 in the Rural Municipality of Parkland County, AB.

Adjacent to the landowner lands: the lands located immediately to the south of the landowner lands that are required for the construction of the TMEP pipeline.

Construction: As defined in the NEB Report for Certificate OC-064 ([A80871-3](#), PDF Page 3 of 82).

1. Residence and its Foundation

Prior to Construction

- a. The Board directs Trans Mountain, **prior to construction on or adjacent to the landowner lands**, to:
- a.i) conduct a pre-construction inspection of the landowner residence and its foundation;
 - a.ii) prepare a **pre-construction inspection report** which will include, at a minimum, documentation including photographs of the pre-construction condition of the residence and foundation;
 - a.iii) provide the landowner with a copy of the pre-construction inspection report; and
 - a.iv) file with the Board, **at least 15 days prior to the commencement of construction on or adjacent to the landowner lands**, confirmation that it has fulfilled this requirement.

After Construction and Final Clean-up

- b. The Board directs Trans Mountain, **12 months after completing final clean-up on or adjacent to the landowner lands**, to:
- b.i) conduct a post-construction inspection of the items documented in the pre-construction inspection report;
 - b.ii) provide a copy of the post-construction inspection report to the landowner; **and**
 - b.iii) file with the Board a confirmation that it has fulfilled this requirement.
- c. Trans Mountain must file with the Board, **6 months following the completion of the post-construction inspection report**:
- c.i) confirmation that no new damage, other than that noted in the pre-construction report, was identified in the post-construction inspection report; **or**
 - c.ii) should any new damage be noted in the post-construction inspection report that was not present in the pre-construction report Trans Mountain is required to:
 - 1. confirm that work to repair any new damage has been completed by qualified professionals and has restored the landowner's residence and/or foundation to its pre-construction condition; **or**
 - 2. provide a timeline for when the repairs are planned to be completed; **or**
 - 3. provide justification that Trans Mountain determined the damage was not caused by construction.

2. Septic System

Prior to Construction

- a. The Board directs Trans Mountain, **prior to construction on or adjacent to the landowner lands**, to:
 - a.i) have a professional installer conduct an inspection of the landowner's septic system to complete a pre-construction functional analysis and prepare a pre-construction septic system inspection report (**pre-construction septic report**) for the current system;
 - a.ii) provide a copy of the pre-construction septic report to the landowner;
 - a.iii) locate and mark the septic system including the tank and tile field; **and**
 - a.iv) file with the Board, **at least 15 days prior to the commencement of construction on or adjacent to the landowner lands**, confirmation that it has fulfilled these requirements.

After Construction and Final Clean-up

- b. The Board directs Trans Mountain, **within 60 days after completing final clean-up on or adjacent to the landowner lands**, to:
 - b.i) re-inspect the septic system to complete a post-construction functional analysis and prepare a post-construction septic system inspection report (**post-construction septic report**);
 - b.ii) provide a copy of post-construction septic report to the landowner; **and**
 - b.iii) file confirmation with the Board that:
 1. no new damage was identified in the post-construction septic report; **or**
 2. should any new damage be noted in the post-construction septic report that was not present in the pre-construction septic report, Trans Mountain is required to:
 - a. confirm that work to repair any new damage has been completed by qualified professionals and has restored the landowner's septic system to, at a minimum, its pre-construction condition **or**
 - b. provide a timeline for when the repairs are planned to be completed; **or**
 - c. provide justification that Trans Mountain determined the damage was not caused by construction.
- c. The Board further directs Trans Mountain **18 months after completing final clean-up** to:
 - c.i) re-inspect the septic system to complete a post-construction functional analysis and prepare a final septic system inspection report (**final septic report**);
 - c.ii) provide a copy of the final septic report to the landowner; **and**
 - c.iii) file confirmation with the Board that:
 1. no new damage was identified in the final septic report; **or**

2. should any new damage be noted in the final septic report that was not present in the pre-construction or post-construction septic reports, Trans Mountain is required to:
 - a. confirm that work to repair any new damage has been completed by qualified professionals and has restored the landowner's septic system to, at a minimum, its pre-construction condition; **or**
 - b. provide a timeline for when the repairs are planned to be completed; **or**
 - c. provide justification that Trans Mountain determined the damage was not caused by construction.

The Board reminds Mr. and Mrs. Sarango and Trans Mountain that the Board always has the ability to ask information requests and inquire further about filings related to conditions, whether they originate from Certificate OC-064 or from this decision. Based on the information provided, the Board may also give further directions to the company.


In the Board's view, the routing near the Sarango lands is consistent with Trans Mountain's criteria to route its new TMEP pipeline within or adjacent to the existing TMPL easement, and the Board is not convinced that the impacts of the proximity of the route to the Sarangos' residence is outweighed by the appropriateness of the route, especially if the conditions set out in this Decision, proposed mitigations included in the Environmental Protection Plan, and other Certificate OC-064 conditions are fulfilled.

The Board is of the view that a horizontal directional drill, as proposed by Mr. and Mrs. Sarango, would be more disruptive, take longer, and be much more costly than the horizontal drill bore proposed by Trans Mountain.

Having considered all of the evidence filed on the record by Mr. and Mrs. Sarango and Trans Mountain, the representations made at the oral portion of the hearing, and the matters and conditions described above, the Board finds that Trans Mountain's proposed route is the best possible detailed route for the TMEP adjacent to Mr. and Mrs. Sarango's lands. The Board also finds that the proposed method and the timing of constructing the new TMEP pipeline are the most appropriate.

Any approval by the Board of the PPBoR for the Sarango lands will include the conditions above, as well as conditions requiring Trans Mountain to list and fulfill the commitments it made in the course of this detailed route hearing, and update its alignment sheets. Mr. and Mrs. Sarango are entitled to seek remedy from the Board if commitments or conditions are not being fulfilled.

Trans Mountain is reminded that the relevant conditions of approval in Certificate OC-064 apply to the construction and operation of the TMEP in relation to any work on the Sarango lands.

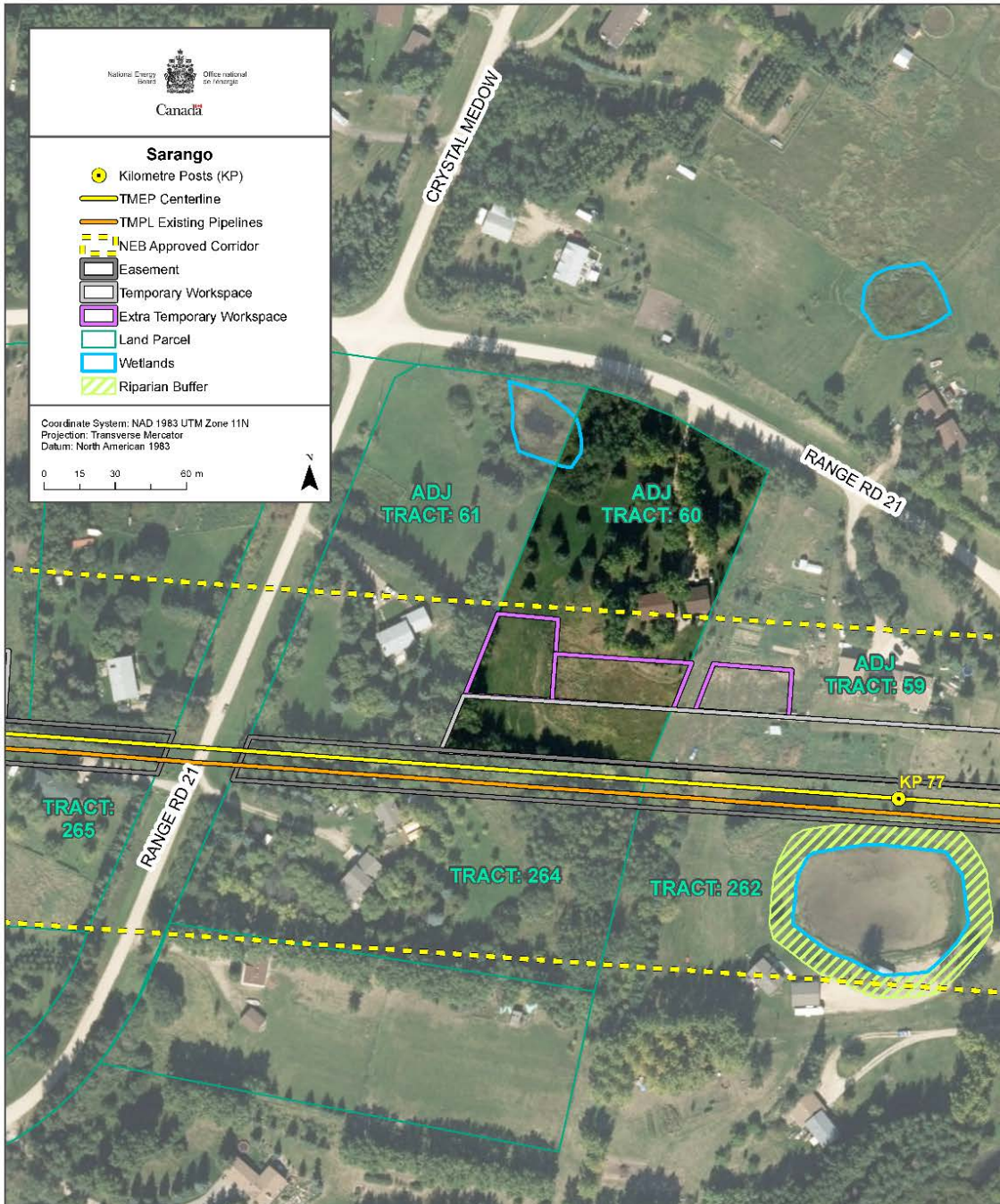

L. Mercier
Presiding Member


S. Parrish
Member


J. Ballem
Member

Appendix I – Map of the Mr. and Mrs. Sarango’s property

This map was created by the NEB for illustrative purposes only.



MAP PRODUCED BY THE NEB, FEBRUARY 2018. THIS MAP HAS BEEN GENERATED BY THE NEB FOR ILLUSTRATIVE PURPOSES ONLY. THE NEB DISCLAIMS ALL RESPONSIBILITY FOR ANY ERRORS, OMISSIONS AND INACCURACIES. READERS WISHING TO CONSULT THE ACTUAL MAPS AS THEY WERE FILED SHOULD REFER TO THE OFFICIAL RECORD.