

December 18, 2019

Enforcement File 19-123

NOVA Gas Transmission Ltd.
450-1st Street SW
Calgary, Alberta, T2P 4K5

Attention: Sheri Wannamaker, Senior Land Representative

RE: Warning: Failure to comply with a permit, Section 21(b)(ii) of the Oil and Gas Activities Act

Dear Ms. Wannamaker,

On November 20, 2019 the BC Oil and Gas Commission (Commission) was informed through a Notice of Construction start via eSubmission that NOVA Gas Transmission Ltd. (NOVA Gas) began construction on November 12, 2019 for NEB Road Right of Ways for permit AD 100104371 and permit AD 100104690.

Permit AD 100104371 has the following conditions;

"A notice of construction start must be submitted, as per the relevant Commission process at the time of submission, at least 48 hours prior to the commencement of activities under this permit." and,

"The permit holder must notify the Blueberry River First Nations Lands Department office two (2) working days prior to project commencement. Notification will be sent via email to lands@blueberryfn.ca, RShakya@blueberryfn.ca, jcalvert@blueberryfn.ca and oilandgas@blueberryfn.ca"

Permit AD 100104690 has the following conditions;

"A notice of construction start must be submitted, as per the relevant Commission process at the time of submission, at least 48 hours prior to the commencement of activities under this permit." and,

"The Permit Holder must notify the Halfway River First Nation Lands Department office two (2) working days prior to project commencement. Notification will be sent via email to blilly@hrfn.ca and referral@hrfn.ca."

A notice of construction start was to be submitted by NOVA Gas to the Commission no later than November 10, 2019, and to Blueberry First Nations and Halfway River First Nations no later than November 8, 2019 to meet the permit conditions for the November 12, 2019 construction start.

The commission was notified on November 20, 2019, and Blueberry First Nations and Halfway River First Nations were notified on December 6, 2019 that NOVA Gas began construction on November 12, 2019 without submitting a Notice of Construction Start.

The Commission notes that NOVA Gas has been cooperative throughout the investigation and has updated procedures to ensure this incident will not be repeated.

Given the circumstances, NOVA Gas is hereby issued a warning for the following:

Between November 9, 2019 and December 6, 2019 NOVA Gas did fail to comply with two conditions of permit AD 100104371 and two conditions of permit AD 100104690 and did thereby contravention section 21(b)(ii) of the *Oil and Gas Activities Act*.

If you have any questions or comments, please do not hesitate to contact the undersigned.

Sincerely,

<original signed by>

Compliance & Enforcement Officer
BC Oil and Gas Commission