



INSPECTION OFFICER ORDER NO. SN – 001 – 2025

IN THE MATTER OF THE CANADIAN ENERGY REGULATOR ACT, AN ORDER UNDER SECTION 109

Westcoast Energy Limited Partnership is a Company conducting work located near Pink Mountain, British Columbia.

On or about 21 November 2025 at 09:00 AM the undersigned Canada Energy Regulator Inspection Officer conducted an incident follow up to INC2025-096 and compliance verification activity (CV2526-341) at Westcoast Energy Limited Partnership (Westcoast) Aitken Creek Pipeline Loop, part of the Aspen Point Project, near Pink Mountain, British Columbia.

RELEVANT FACTS

The following are the relevant facts relating to the issuance of this Order:

1. On 15 November 2025, CER Inspection Officers were notified of damage to pipe causing a release. As per the initial submission and verification of information gathered at site, there were approximately 25 workers present at the work location where an observation hole was being excavated to aid ongoing direct pipe installation. Initial reports by Westcoast noted that workers smelled hydrocarbon odor on site which prompted a site evacuation.
2. A live 300 mm (12-inch) outside diameter (OD) and 400 mm (16-inch) OD pipeline were located and marked along the full length of the right-of-way (RoW), each requiring crossings by the tunnel boring machine (TBM) during the Direct Pipe Installation (DPI). At the incident location, the locate markings for the 400 mm OD pipeline were observed to be aligned immediately upstream and downstream of the affected area. A survey stake had been placed to indicate the approximate point where the 400 mm OP pipeline intersected with the planned drill path. Another survey stake was placed approximately 2 meters from the interstation point to mark the location of a planned observation hole. Given the pipe depth and sloughing caused by soil conditions, the observation hole could not be reliably maintained.
3. On 15 November 2021, a steel flume was installed within the observation hole to verify the TBM depth along the drill path. The near wall of the flume was positioned approximately 1.65 m from the survey stake on the drill side. The decision to install a steel flume in the observation hole was reached by consensus between Michels (Foreman and Superintendent) and Westcoast (Chief Inspector and Inspector), following unsuccessful attempts to maintain the hole using standard hydrovacing and a corrugated

culvert. A ground disturbance permit authorizing the installation of the steel flume was issued by the Enbridge Inspector on the day of the event.

4. The ground disturbance permit showed that the 400 mm (16-inch) OD pipeline had been positively identified, however that had been done several days earlier and the backfilled site hole for the 16-inch pipe was not distinguishable from other backfilled ground disturbances in the immediate area.
5. The ground disturbance permit captured the TBM hydrovac and flume installation in the work description but excluded the live 400 mm (16-inch) OD pipeline in the hazards/special conditions section.
6. Westcoast procedures require positive identification of the pipeline, including specific provisions for locating pipeline bends, as outlined in the Ground Disturbance Standard (DP-50.401, Section 17). The affected 400 mm (16-inch) OD pipeline had not been positively identified immediately prior to the hydrovac and mechanical excavation activities underway at the time gas was detected.
7. Company representatives did not demonstrate adequate supervision when mechanical excavation occurred within three (3) metres of the pipe, as evidenced by the failure to ensure compliance with the requirements of OPR section 20 (Construction Safety Manual), Enbridge Life Saving Rule 4 – Ground Disturbance, and the Enbridge Ground Disturbance Standard.
8. Westcoast was issued another order (IOO-DRP-002-2025) where a gap in ground disturbance practices was identified. As part of the corrective action plan submitted for this Inspection Officer Order, Westcoast proposed development of a temporary ground disturbance checklist.

MEASURES TO BE TAKEN

Based on the facts referenced herein, where the Inspection Officer has reasonable grounds to believe that there is or is likely to be a contravention of Parts 2 to 5 or section 335 of the CER Act, or for a purpose referred to in subsection 102(2) CER Act, the Inspection Officer may, by Order, direct a person to

- a. stop doing something that is in contravention of Parts 2 to 5 or section 335 or cause it to be stopped;*
- b. take any measure that is necessary in order to comply with Parts 2 to 5 or section 335 or mitigate the effects of non-compliance;*
- c. stop doing something that may cause a hazard to the safety or security of persons, or damage to property or the environment or cause it to be stopped; or*
- d. take any measure that is necessary to prevent or mitigate the hazard to the safety or security of persons or damage to property or the environment.*

Westcoast Energy Limited Partnership is ORDERED pursuant to subsections 109(1) and 109(2) of the CER Act to:

- Take measures specified below under Specified Measures as per paragraphs (b) and (d) above
- Stop doing something as specified below under Specified Measures as per paragraphs (a) and (c) above
- Suspend work associated with a facility, including a regulated facility, abandoned facility or ground disturbance, until the hazardous or detrimental situation has been remedied to the satisfaction of an Inspection Officer or until this order is stayed or rescinded.

SPECIFIED MEASURES

1. Ensure that the temporary ground disturbance checklist being developed under the Corrective and Preventive Action (CAPA) for IOO-DRP-002-2025, specifically items 1 and 5 of the Event Analysis Report for the Westcoast CS8A Kingsvale line strike, applies to all complex line crossings (i.e., where conditions or information create unanticipated difficulty or hazards and therefore require enhanced verification, supervision, and caution), trenchless activities, and mechanical ground disturbance within (3) three metres of a regulated pipeline across Westcoast's system. The checklist must include:
 - a. Identification of pause-work triggers, including discrepancies in locate staking, unexpected alignments, proximity to bends, deviations from drawings, conflicting survey data, or any uncertainty regarding pipe location or depth.
 - b. Documented field verification at each complex or hazard-prone location, including:
 - confirmation of pipeline location and depth;

- verification that positive identification has been completed where required;
 - sign-off by both company and contractor supervisors before work resumes;
 - identification of any changes in site conditions since the previous confirmation.
2. Submit to the Inspection Officer, within 60 days, a written investigation report and an implementation plan for corrective and preventive actions. The plan must address management of complex crossings by assessing risks from direction given to contractors, oversight of the work, competency in managing additional risks while working in complex crossings, and communication between Westcoast and contractors. The CAPA must specifically address:
- a. That workers and contractors are not directed to perform unsafe work.
 - b. How concerns about perceived danger trigger a structured, consensus-based risk assessment between Enbridge and its contractors.
 - c. How Stop Work Authority is supported, communicated, and exercised.
 - d. How safety-critical information and work methods are communicated, validated, and implemented.
 - e. How dissenting safety views are documented and acted upon.
 - f. How supervisory verification practices will be strengthened to prevent recurrence.

EFFECTIVE DATE OF THE ORDER

This Inspection Officer Order takes effect immediately on 04 December 2025 at the time of delivery of this Order to the Company to whom it is directed. Nothing in this Order shall be construed as reducing, increasing, or otherwise affecting what may be required of the Company to whom it is directed to comply with all applicable legislative or legal requirements.

COMPLIANCE WITH THIS INSPECTION OFFICER ORDER IS MANDATORY

Failure to comply with an Inspection Officer Order issued under section 109 of the CER Act is an offence under section 112 of the CER Act.

Inspection Officer	05 December 2025	
	Date	
	IO Designation Number	Signature
	210-517 10 Ave SW, Calgary AB T2R 0A8	

Please note that:

- 1. In compliance with the CER's Enforcement Policy, this Order will be posted on the CER's website.*
- 2. All submissions to the CER in response to the Order are to be provided within the CER Operations Regulatory Compliance Application (ORCA) quoting the associated CVA #, Inspection Officer Order #, and any specific measure with which the submission is associated. In addition, the Company is requested to send a copy of any response provided in the ORCA to the Inspection Officer via email.*