

## EAO FOI EAO:EX

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**From:** Parks, Chris EAO:EX  
**Sent:** March 14, 2019 12:49 PM  
**To:** Matzanke, Elise EAO:EX; Pomeroy, Ashley EAO:EX  
**Cc:** Craven, Paul EAO:EX  
**Subject:** overdue correspondence due to Kevin feb 13 eApprovals item 13397

Apologies all for the delay – the header line in the assignment was confusing as it specifies the Heritage Conservation Act, as opposed to the EA Act. I initially conflated the issue identified in the letter with a concurrent complaint being actioned by the OGC and FLNRORD through their respective authorities.

Upon review of the letter, it

- references a CGL inspection conducted in 2018, and finalized in early January 29, via which a warning was issued to CGL for noncompliance with preconstruction requirements.
- Identifies this noncompliance as evidence that decisions made by EAO during the conduct of the EA to allow the Project to proceed without a complete baseline data for valued components in Wet'suwet'en territory were improper.
- Links the noncompliance with preconstruction conditions, the subsequent warning, and the EA decision to allow CGL to collect baseline data after the issuance of the EAC, and identifies this as a key concern for the Wet'suwet'en,
- Identifies a concern regarding a lack of consultation regarding the studies that have yet to be undertaken in Wet'suwet'en territory,
- Cites the Rio Declaration on Environment and Development and case law in support of their concerns, and
- Requests Government to Government discussions be undertaken to address the issues identified in the letter.

I believe that Ops Div is best placed to respond to the letter given

- that primary subject of the letter relates to decisions made at the EA Stage and IG consultation with respect to those decisions, and
- that the compliance issue is related but peripheral to the key themes of the letter.

I am happy to assist in the response.

Chris

**Chris Parks** | Director, Compliance and Enforcement |  
BC Environmental Assessment Office | T 250.360-6933 | F 250.387-6448  
PO Box 9426 Stn. Prov. Gov't | Victoria BC, V8W 9V1

**From:** O'Hanley, James G  
**To:** Parks, Chris EAO:EX  
**Cc:** Craven, Paul EAO:EX  
**Subject:** FW: Coastal Gaslink Camp 9A - Archaeological Mitigation Plan  
**Date:** March 8, 2019 4:03:55 PM  
**Attachments:** 180433\_Camp9A\_MitigationPlan\_R0.pdf  
FW Coastal Gaslink Camp 9A - Archaeological Mitigation Plan.msg

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Chris, FYI. Attached is the letter sent by Arch Branch and ourselves to legal counsel for the Unistoten on the Camp 9A arch find as well as an email I sent the OW on the same matter. Please let me know if you have questions on any of this.



**James O'Hanley**  
Vice President, Applications  
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**From:** O'Hanley, James G  
**Sent:** Friday, March 8, 2019 3:35 PM  
**To:** 'Mike Ridsdale' <mike.ridsdale@wetsuweten.com>  
**Subject:** FW: Coastal Gaslink Camp 9A - Archaeological Mitigation Plan

Mr. Ridsdale, due to the Office of the Wet'suwet'en's questions and identified concerns related to the identification of artifacts at the Coastal Gaslink (CGL) project's Camp 9A site, I am providing you with information on how that matter is being dealt with by the BC Oil and Gas Commission (the Commission) and CGL. As you are likely aware, upon being informed that artifacts were identified on the site, CGL halted work on the site in accordance with a condition in their authorization. The condition also required them to develop a mitigation plan (the Plan) to address the potential for additional archaeological values being located on the site. CGL submitted the Plan and it has been found acceptable to the Commission and the Archaeology Branch of the Ministry of Forests, Lands and Natural Resource Operations and Rural Development. A copy of the Plan is attached.

Given the acceptance of the Plan, CGL is now in a position to restart work at Camp 9A, subject to compliance with the Plan. We understand that they are not planning to restart ground disturbance work at the Camp 9A location for the next 2 weeks.

We wish to further note that, due to artifacts being found there, Camp 9A has been included in the Province's archaeological database as a legacy archaeological site. The examination of the artifacts recovered from the site under the authority of the *Heritage Conservation Act* is now complete. Archaeology Branch will be working with the involved Indigenous communities to effect the return of the artifacts to the appropriate individuals or communities.

I hope this explanation is helpful. Please let me know if you have questions or require further information on this.



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Vera Brandzin  
6534 Airport Road  
Fort St. John,  
BC Canada V1J 4M6

February 27, 2019

### **Coastal GasLink Pipeline Project – Site Mitigation Plan for Possible Archaeological Site Found at Camp 9A, Construction Section 7**

In light of the artifacts recently found during the construction of Camp 9A, Coastal GasLink and Roy Northern Environmental propose the following three-step approach to mitigating lingering concerns related to the possible site:

- Subsurface testing of topsoil pile,
- Intensive visual inspection of the 100 m buffer area, and
- Ongoing monitoring throughout the construction and reclamation stages of the Project.

Subsurface testing of the topsoil pile will provide further evidence to confirm or negate the presence of additional cultural materials within the boundaries of Camp 9a. Shovels and trowels will be used to excavate sediments. All soils will be screened through ¼ inch mesh. The position of cultural materials will be recorded, and discovered materials will be collected and retained for cataloguing and laboratory analysis. This testing will be conducted under un-frozen conditions. These methods are in accordance with the terms of Heritage Inspection Permit (HIP) 2016-0131.

Intensive visual inspection of the 100 m buffer zone surrounding the found artifacts will be conducted immediately, prior to the commencement of construction, thereby providing further evidence to confirm or negate the presence of additional cultural materials within the boundaries of Camp 9a. Brooms, shovels, and leaf blowers will be used to clear snow from the buffer zone to allow for an intensive visual inspection of exposed soils for artifacts. The position of cultural materials will be recorded, and discovered materials will be collected and retained for cataloguing and laboratory analysis. These methods are in accordance with the terms of HIP Permit 2016-0131.

Ongoing monitoring by a qualified professional archaeologist during the construction and reclamation phases of the Camp 9A portion of the Project will help to ensure future finds can be documented and collected in a timely and professional manner. This measure will be implemented immediately during resumption of construction activities that involve soil disturbance (grading) and during final clean-up / site reclamation phase (when top soil is replaced at the site) which is planned to occur in 2022.

If any of the above mitigation strategies yields additional cultural material, a subsequent discussion with both regulatory bodies (Oil & Gas Commission and Archaeology Branch) will occur to confirm next steps.

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#### **CALGARY**

112 2850 107 Ave. SE  
Calgary, AB T2Z 3R7  
**Phone:** 403.278.9410



Sincerely,

A handwritten signature in black ink, appearing to read "Stephan Girard".

Stephan Girard, M.A. RPCA  
Permit Holder  
Roy Northern Land and Environmental

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[www.roynorthern.com](http://www.roynorthern.com)

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Page 08 to/à Page 10

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March 8, 2019

### Commission Follows Up on Archaeological Complaint

The BC Oil and Gas Commission (Commission) received a complaint from the Dark House/Unist'ot'en of the Wet'suwet'en First Nation at 3:51 a.m. on Thursday, Feb. 14, 2019 regarding cultural artifacts at a work site where construction was underway for an industrial camp (Camp 9A); part of the Coastal GasLink (CGL) Pipeline Project. Camp 9A is situated southwest of Houston, B.C.

The complaint stated two "lithic stone tools" had been found and recovered from Camp 9A by Unist'ot'en supporters and additional artifacts were observed but left in place.

The Commission immediately responded, dispatching a team to the site to determine if CGL was operating in compliance with its permits as well as the broader regulatory framework under the Oil and Gas Activities Act and the Heritage Conservation Act. The team included a senior archaeologist and compliance and enforcement officer from the Commission, supported by an archaeological specialist from the Ministry of Forests, Lands, Natural Resource Operations and Rural Development (FLNRORD). Given the complexities of mobilization as well as security and safety considerations, the team arrived at the site on the afternoon of Friday, February 15.

Observations from the site at the time, included:

- No work was underway at the site. Work had stopped upon notification artifacts may be present.
- An area of the site had been marked off by parties other than CGL. CGL noted this was the area where artifacts were reported to have been seen.
- CGL had established a 100 m buffer around the area as an additional exclusion zone and had not entered the area, which had been graded down to glacial clay deposits.
- Upon entry into the marked area and after some snow clearing, the team observed lithics (stone artifacts) on top of frozen clay soils.
- The lithics were gathered for their protection and further examination under the proper authority of the Heritage Conservation Act.

Subsequent to the site visit, it has been determined:

- The soils upon which the artifacts were found would not typically contain any such cultural artifacts and this was likely not their original location. However, a definitive determination on their exact location of origin can not be made.
- The artifacts referred to in the complaint as "recovered" were not present.

Initial examination of the artifacts is complete. Additional work is ongoing but does not require the further retention of the artifacts. As such, the Archaeology Branch within FLNRORD is working towards the return of the artifacts to the appropriate Indigenous communities.

The Commission's permit for Camp 9A includes a condition governing the steps to be taken should artifacts be discovered during the course of work. This permit condition requires CGL to stop work if heritage objects are found and notify the Commission. The permit further requires CGL to file a

Mitigation Plan acceptable to the Archaeology Branch of FLNRORD before work can resume – that Plan has now been accepted by the Archaeology Branch and the Commission.

The Plan requires CGL to determine if there is additional cultural material on the site by having archaeologists:

- Assess the area surrounding the location where the artifacts were found – if no cultural material is found in this assessment, CGL will be able to resume work on the site.
- Sample the topsoil stockpiled on the edge of the site once it is no longer frozen.
- Supervise construction operations on the site once work restarts.
- Further assess the topsoil when it is spread back on the site during future site reclamation.

**For media inquiries regarding this Information Bulletin, please contact:**

Lannea Parfitt  
Manager, Communications  
BC Oil and Gas Commission  
Lannea.Parfitt@bcogc.ca  
250-980-6081



Page 13 to/à Page 19

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s.16;s.13

## EAO FOI EAO:EX

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**From:** Braun, Nathan EAO:EX  
**Sent:** March 7, 2019 8:14 AM  
**To:** Hoyle, Meaghan EAO:EX; Parks, Chris EAO:EX  
**Cc:** Davies, Leanne FLNR:EX  
**Subject:** FW: FOR REVIEW: Letter to Mike Ridsdale from Archaeology Branch  
**Attachments:** RE: FOR REVIEW: Letter to Mike Ridsdale from Archaeology Branch; Response to MRidsdale.docx

Sorry, I should have sent this along earlier. I have a couple of comments in the attached. Please add anything and share it with Leanne asap.

Thanks,

**NATHAN BRAUN**

OFFICE: 778-698-9280 | MOBILE: 250-882-2050

---

**From:** Davies, Leanne FLNR:EX  
**Sent:** March 6, 2019 4:48 PM  
**To:** Waters, Cory IRR:EX <Cory.Waters@gov.bc.ca>; Puggioni, Giovanni IRR:EX <Giovanni.Puggioni@gov.bc.ca>; Braun, Nathan EAO:EX <Nathan.Braun@gov.bc.ca>; Howes, Ken OGC:IN <Ken.Howes@bcogc.ca>; Black, Becky AG:EX <Becky.Black@gov.bc.ca>; XT:Ollenberger, Lance GCPE:IN <Lance.Ollenberger@bcogc.ca>; James.OHanley@bcogc.ca  
**Cc:** Rousselle, Jillian FLNR:EX <Jillian.Rousselle@gov.bc.ca>; Kapac de Frias, Martina FLNR:EX <Martina.KapacdeFrias@gov.bc.ca>; Shaw, Rachel EMPR:EX <Rachel.Shaw@gov.bc.ca>  
**Subject:** RE: FOR REVIEW: Letter to Mike Ridsdale from Archaeology Branch

Hello Everyone,

I have not heard back from folks on this – Archaeology Branch intends to send the letter tomorrow. Please advise before 10AM tomorrow (Thursday, March 7) if you have any concerns.

Sincerely,

**Leanne Davies** | A/Director

Archaeology Branch | Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Phone: 250-952-1548 | Cell: 778-584-1325



Where ideas work



---

**From:** Davies, Leanne FLNR:EX  
**Sent:** February 28, 2019 12:21 PM  
**To:** Waters, Cory IRR:EX <Cory.Waters@gov.bc.ca>; Puggioni, Giovanni IRR:EX <Giovanni.Puggioni@gov.bc.ca>; Braun, Nathan EAO:EX <Nathan.Braun@gov.bc.ca>; Howes, Ken OGC:IN <Ken.Howes@bcogc.ca>; Black, Becky AG:EX <Becky.Black@gov.bc.ca>; XT:Ollenberger, Lance GCPE:IN <Lance.Ollenberger@bcogc.ca>; 'James.OHanley@bcogc.ca' <James.OHanley@bcogc.ca>  
**Cc:** Rousselle, Jillian FLNR:EX <Jillian.Rousselle@gov.bc.ca>; Kapac de Frias, Martina FLNR:EX

<Martina.KapacdeFrias@gov.bc.ca>; Shaw, Rachel EMPR:EX <Rachel.Shaw@gov.bc.ca>

**Subject:** FOR REVIEW: Letter to Mike Ridsdale from Archaeology Branch

Hello everyone,

Archaeology Branch has received various pieces of correspondence over the past month from the Office of the Wet'suwet'en and Dark House regarding archaeology related to the CGL project.

While many of the letters and emails no longer require a response, there are some requests for information that are still outstanding. Our initial draft letter is attached, and we will also be responding with a separate letter with more technical information related to another piece of correspondence (referenced in this response).

As per Rachel Shaw and Jillian Rousselle's advice, I am sending this draft to you for review. Please let me know if you have any concerns with the content of the letter by end of day Monday, March 5, 2019.

Sincerely,

Leanne Davies | A/Director

Archaeology Branch | Ministry of Forests, Lands, Natural Resource Operations and Rural Development

Phone: 250-952-1548 | Cell: 778-584-1325



Where ideas work





February 27, 2019

Dear Mr. Ridsdale;

Thank you for your letter of February 1, 2019 and email correspondence of February 7, 2019. Regarding your request for spatial data of February 5, 2019, we are working to respond to that request separately.

Archaeology Branch can only speak to questions directly related to the Archaeological Impact Assessments conducted under Heritage Conservation Act Permits; the Environmental Assessment Office (EAO) and the Oil and Gas Commission (OGC) will respond directly on the items in which they are referenced. We understand CGL is required to undertake more field work as per their OGC permit. The OGC is best positioned to speak to what work is still outstanding.

Please see my responses to your comments specifically from the letter of February 1, 2019 as follows:

Item No.	Response
1	Archaeology Branch has conducted a review of the file and no violation of the Archaeology Branch issued <i>Heritage Conservation Act</i> (HCA) permit was found. The branch does not currently have reason to believe a violation of the HCA has occurred.
4	Archaeology Branch is unclear on this statement. As of the time of your letter (February 1) there had been no order issued under Section 14 of the HCA for this Archaeological Impact Assessment (AIA); therefore, section 15 of the HCA does not apply.
5	Archaeology Branch can confirm that referrals for permits 2013-0004 and 2013-0033 were sent to the Office of the Wet'suwet'en and Wet'suwet'en First Nation.
26	Camp / Multi-Use Site 9A is discussed in the Final Report Addendum (2013-0033-0019)

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Lands, Natural  
Resource Operations  
and Rural Development

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Item No.	Response
28	The Archaeological Overview Assessments (AOAs) were completed under HCA Permit S14 2013-0033 and are considered part of the AIA work. The HCA does not require ground-truthing of all project areas in their entirety. The desktop review focuses field activities on areas of identified high potential, and may verify areas of low potential (e.g., spot-check). The HCA does not protect areas of archaeological potential, only archaeological sites.
30	Traditional knowledge studies are outside the scope of the HCA. The AIA report includes background work of other studies previously conducted in the area. However, the results of the current study are not bound to previous results - they may support or refute previous findings.
32	Archaeology Branch requires the full reference information to respond to this comment.
34	Project components were assessed under the AIA using AOA studies to determine archaeological potential. In cases where potential was identified (e.g., Camp 9A at KP 574.5), access issues prevented field visits.
40	Background research for the AIA report would need to determine approximate age of the Kweese War Trail to determine if it is protected by the HCA. If it is determined to be outside the scope of the HCA, the trail would be considered of traditional use and would need to be included under the EAO heritage chapter that would include traditional knowledge.
42	More information is needed to confirm which project components were cleared and when. The referenced Chance Find Protocol is a tool for the construction crews, not part of the assessment under the HCA permit. The HCA does not have provisions for conditions of non-permitted work. However, unrecorded archaeological sites are protected by the HCA. If a site is identified during construction, all land-altering activities in the vicinity of the discovery must stop immediately and the Archaeology Branch contacted for the appropriate permitting and assessment.
44	The Archaeology Branch received, reviewed, and accepted the 2013-0033 Final Report in January 2016, and the Final Report Addendum in September 2016.
46	Multi-Use Site 9A was assessed via a desktop AOA under the AIA and reported in the Final Report Addendum written in Sept 2015. No fieldwork was conducted to visit the small area of low to moderate potential for CMTs identified at this component.
47	Traditional knowledge studies are outside the scope of the HCA. The AIA report includes background work of other studies previously conducted in the area and may include a brief ethnographic history in the background portion of the AIA final report. The archaeologists assessed archaeological potential with project components based on background studies and terrain features. Traditional knowledge studies would be under the jurisdiction of the EAO.

Commented [NB1]: Phrasing isn't quite right, since the EA was completed in 2014. Maybe remove sentence?

Commented [NB2]: Would need to reference back to the application, EA, and (possibly) any condition requirements. This is too general

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Resource Operations  
and Rural Development

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Item No.	Response
48	Archaeologists do not typically research legal proceedings as part of their AIA background research. They access technical and academic sources, and early journals, if the latter is available.
49	As part of the assessment of archaeological potential during the AIA, archaeologists consider proximity to water bodies and drainages, including fish-bearing creeks and rivers, as well as recorded archaeological sites.
50	Archaeology Branch requires specific details to respond to this comment.

While the table above is a direct response to your February 1, 2019 correspondence, we anticipate the information included in this letter also addresses comments and questions from email correspondence in recent weeks to the Archaeology Branch, including emails from Jason Slade on February 1, 2019, Priscilla Mitchell on February 6, 2019 and yourself on February 7, 2019.

Please let me know if you have any further questions.

Respectfully,

Leanne Davies  
A/Director – Archaeology Branch

Ministry of Forests,  
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Resource Operations  
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Archaeology Branch

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Page 27 to/à Page 40

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**EAO FOI EAO:EX**

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**From:** Blackthorne, Sebastian FLNR:EX  
**Sent:** February 6, 2019 2:08 PM  
**To:** Davies, Leanne FLNR:EX  
**Subject:** Fw: AIA for Camp 9A

Hi Leanne,

I've forwarded you the latest below from Dark House. Am I fine to proceed with sending out my email asking for further information?

Seb

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s.16

Page 42

Withheld pursuant to/removed as

s.16

**From:** Parks, Chris EAO:EX  
**To:** Lombardi, Christie EAO:EX  
**Subject:** CGL complaint from RIDSDALE, OW, regarding AIA for Camp 9A  
**Date:** March 4, 2019 1:58:00 PM

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On the afternoon of Wednesday, February 27 I returned a call from and spoke with Mike Ridsdale, Office of the Wet'suwet'en and explained that EAO does not have jurisdiction with respect to the AIA conducted for 9A, or elsewhere on the project. We discussed that EAOs jurisdiction for arch is limited the implementation of a chance find procedure through the project EMP required by Condition 26.

Chris

**Chris Parks** | Director, Compliance and Enforcement |  
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PO Box 9426 Str. Prov. Gov't | Victoria BC, V8W 9V1

## EAO FOI EAO:EX

---

**From:** Braun, Nathan EAO:EX  
**Sent:** February 15, 2019 12:51 PM  
**To:** Kim Ogilvie  
**Cc:** Mergen, Tim FLNR:EX; Howes, Ken OGC:IN; Hoyle, Meaghan EAO:EX; Trevor Halford; Matthew Ducharme  
**Subject:** Re: Coastal GasLink - Summary of discussion

Thank you

Sent from my iPhone

On Feb 15, 2019, at 12:03, Kim Ogilvie <[kim\\_ogilvie@transcanada.com](mailto:kim_ogilvie@transcanada.com)> wrote:

Good afternoon all

I wanted to share an update about our current challenges at the Unist'ot'en camp.

- The Unist'ot'en Camp claims to have found a number of arrowheads within the active construction site known under our OGC permit as Multi-Use Site 9A. This site will be used for employee and contractor accommodations during construction in this area.
- On being notified, Coastal GasLink took immediate steps to initiate the measures within our approved Heritage Resource Discovery Contingency Plan. We have stopped work at the site and cordoned off a precautionarily large buffer zone from construction activity. We have requested our Archaeologist to go to site to complete an investigation. The OGC and FLNRORD Archeology Branch will also be visiting the site to further investigate the claims.
- As a condition of our permit our licenced Archeologists assessed the archeological potential for the site and vicinity by means of a AOA as access to the site was blockaded during field programs in 2015. The AIA concluded low archeological potential due to site characteristics and extensive previous disturbance. The site is a cut block. There are no known archeological sites within 2000m of the site. The findings and AIA were approved by the BC Archaeology Branch.
- The Archeology Branch has been notified of the issue and our Archeologist (Stephan Girard) will attend a site visit with Sebastian Blackthorne (FLNRORD, Archeology Branch) as well as with Vera Berezen (OGC, Archeology Branch) and OGC Compliance and Enforcement officer to gather information.
- Coastal GasLink has received media requests on this topic and is responding accordingly.

Let me know if you have any questions  
Kim

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<CGL--Arrowhead Talking Points Final.pdf>

## EAO FOI EAO:EX

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**From:** Braun, Nathan EAO:EX  
**Sent:** February 15, 2019 12:51 PM  
**To:** Craven, Paul EAO:EX; Parks, Chris EAO:EX; Bailey, Scott EAO:EX  
**Cc:** Hoyle, Meaghan EAO:EX  
**Subject:** Fwd: Coastal GasLink - Summary of discussion  
**Attachments:** CGL--Arrowhead Talking Points Final.pdf; ATT00001.htm

FYI

Sent from my iPhone

Begin forwarded message:

**From:** Kim Ogilvie <[kim\\_ogilvie@transcanada.com](mailto:kim_ogilvie@transcanada.com)>  
**Date:** February 15, 2019 at 12:02:53 PST  
**To:** "Mergen, Tim FLNR:EX" <[Tim.Mergen@gov.bc.ca](mailto:Tim.Mergen@gov.bc.ca)>, Ken Howes <[Ken.Howes@BCOGC.ca](mailto:Ken.Howes@BCOGC.ca)>, "Hoyle, Meaghan EAO:EX" <[Meaghan.Hoyle@gov.bc.ca](mailto:Meaghan.Hoyle@gov.bc.ca)>, "Braun, Nathan EAO:EX" <[Nathan.Braun@gov.bc.ca](mailto:Nathan.Braun@gov.bc.ca)>  
**Cc:** Trevor Halford <[trevor\\_halford@transcanada.com](mailto:trevor_halford@transcanada.com)>, Matthew Ducharme <[matthew\\_ducharme@transcanada.com](mailto:matthew_ducharme@transcanada.com)>  
**Subject:** Coastal GasLink - Summary of discussion

Good afternoon all

I wanted to share an update about our current challenges at the Unist'ot'en camp.

- The Unist'ot'en Camp claims to have found a number of arrowheads within the active construction site known under our OGC permit as Multi-Use Site 9A. This site will be used for employee and contractor accommodations during construction in this area.
- On being notified, Coastal GasLink took immediate steps to initiate the measures within our approved Heritage Resource Discovery Contingency Plan. We have stopped work at the site and cordoned off a precautionarily large buffer zone from construction activity. We have requested our Archeologist to go to site to complete an investigation. The OGC and FLNRORD Archeology Branch will also be visiting the site to further investigate the claims.
- As a condition of our permit our licenced Archeologists assessed the archeological potential for the site and vicinity by means of a AOA as access to the site was blockaded during field programs in 2015. The AIA concluded low archeological potential due to site characteristics and extensive previous disturbance. The site is a cut block. There are no known archeological sites within 2000m of the site. The findings and AIA were approved by the BC Archeology Branch.
- The Archeology Branch has been notified of the issue and our Archeologist (Stephan Girard) will attend a site visit with Sebastian Blackthorne (FLNRORD, Archeology Branch) as well as with Vera Berezen (OGC, Archeology Branch) and OGC Compliance and Enforcement officer to gather information.
- Coastal GasLink has received media requests on this topic and is responding accordingly.



Let me know if you have any questions  
Kim

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Merci

## **Talking Points**

### **Alleged Arrowhead Discovery at Site 9A**

**Issue:** The Unist'ot'en Camp claims to have found a number of arrowheads at Site 9A and have posted it to their website. We understand that they have filed a complaint with the Oil and Gas Commission which is sending a staff to the site today.

The fact that the OGC is acting on the complaint will likely generate negative media interest and further social media against the project. Two media calls have already been received from the Northern Sentinel and Globe and Mail.

CGL needs to establish a position with government, the public and supportive First Nations that we have done significant archaeological work in the area already and are taking steps to ascertain the validity of the claim.

### **Project Update Web Posting**

Coastal GasLink has voluntarily suspended work at its site south of Houston while claims of the discovery of artifacts on the site are investigated.

On being notified, Coastal GasLink took immediate steps to cordon off and protect the area and requested that a qualified archeologist visit the site. The Oil and Gas Commission (OGC) will also visit the site to further investigate the claims.

Coastal GasLink takes the conservation and protection of culturally-important heritage sites and artifacts seriously and has implemented an approved Heritage Resource Discovery Contingency Plan while notifying the responsible regulatory authorities.

As part of the permitting requirements, an Archeological Impact Assessment (AIA) was completed for the site and nearby area.

Unfortunately, during the regulatory and permitting process, CGL and its archaeologists were not able to access the 9A site due to road access issues and were therefore unable to conduct onsite fieldwork.

As a result, experienced licensed archeologists from Northern BC assessed the potential for artifacts at the site. The assessment determined low potential and no further work was required. The AIA was approved by the BC Archeology Branch in 2016.

There are no known archeological sites registered within 2000 metres of the site, which was selected by CGL because of it being a previously disturbed area. The site in question was previously cleared and used as part of forestry work.

### Talking Points:

- Coastal GasLink has voluntarily suspended work at its site south of Houston while claims of the discovery of artifacts on the site are investigated.
- We take our responsibility to protect culturally-important Indigenous artifacts extremely seriously.
- Coastal Gaslink has initiated our approved Heritage Resource Discovery Contingency Plan that temporarily stops work in the vicinity of the site and includes a buffer zone in the area while an investigation can occur.
- We have engaged an Archaeologist who will go to the site and undertake an assessment as to what, if any, artifacts have been found or are presently at the site.
- As part of our environmental assessment, we undertook significant archaeological work in the area using experienced northern archaeologists.
- Unfortunately, CGL and its archaeologists were not able to access the 9A site due to road access issues and were therefore unable to conduct onsite fieldwork.
- As a result, licensed archeologists assessed the potential for artifacts at the site. The assessment determined low potential and no further work was required. The AIA was approved by the BC Archeology Branch in 2016.
- There are no known archeological sites registered within 2000m of the site, which was previously cleared during forestry work.

## EAO FOI EAO:EX

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**From:** Braun, Nathan EAO:EX  
**Sent:** February 14, 2019 8:45 AM  
**To:** Parks, Chris EAO:EX  
**Cc:** Craven, Paul EAO:EX  
**Subject:** FW: URGENT: CGL must stop work due to significant archaeological discovery at proposed Site 9A  
**Attachments:** 2019\_02\_Unistoten\_Letter\_Re\_Lithic\_Stones.pdf

I think this would be considered a complaint. Can I pass this over to you? Let me know if you need any support.

**NATHAN BRAUN**

OFFICE: 778-698-9280 | MOBILE: 250-882-2050

s.16,s.22

Page 51 to/à Page 52

Withheld pursuant to/removed as

s.16