



## Appendix C E-14-As Submitted

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	April 8, 2021	Contractor Name:	Valard Construction LP	Group No.:	1
Owner's Representative	Tom Harty	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-0587
<b>Incident Observations</b> The following observations were made on the Project Site:  During a recent site visit to AB-563, I observed some silt entering a waterbody near AB-540. The source of the silt was mud running down a slope from the access trail to the small stream.  Can you advise if the area has been stabilized and if Valard has a monitoring plan for constructed stream crossing especially during the spring runoff period?  Pictures are attached.					
<b>Observation Date: April 7, 2021</b>					
<b>Owner's Representative:</b> <u>Tom Harty</u> <b>Signature:</b> <u></u> <b>Date:</b> <u>April 8, 2021</u>					
<b>Contractor Response</b> Indicate your response to the above-noted items and specify dates by which a response will be provided for each item to ensure compliance with the Contract Appendix D8, Schedule Q, and the updated Environmental and Social Management Plan.					
<b>Description</b>					<b>Date</b>
Contractor H&S Manager: <u>Mark Ford</u> <b>Signature:</b> <u></u> <b>Date:</b> <u>April 19, 2021</u>					
Contractor Project Manager: _____ <b>Signature:</b> _____ <b>Date:</b> _____					





## EXHIBIT E-14a

### Field Observation and Contractor's Response

Date:	April 27, 2021	Contractor Name:	Valard Construction LP	Group No.:	1, 2, 3
Owner's Representative:	Wade Best	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-629

#### Incident Observations

The following observations were made on the Project Site:

The RoW for the cleared areas of the project had ribbon placed in trees by the survey group to mark the route for the operators, every 10 meters or so, these ribbons are still tied on to trees and branches although clearing has been completed. Please explain what Valard plans to do, if anything, to remove these ribbons. As well as timelines for this activity.



Observation Date: April 27, 2021

Owner's Representative: Wade Best Signature: [Signature] Date: April 27, 2021

### Contractor Response


The flagging will not be removed from the ROW. It is standard industry practice to leave flagging for demarking the property boundaries to identify for other interest holders in the area. Valard Environment will remove flagging associated with assessed Archaeological potential sites (upon clearance from MHSTCI), as well as bird nests or sensitive features that no longer exist.

Description	Date

Prepared By: Mark Ford Signature: Mark Ford Date: June 3, 2021

Approved By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	June 23, 2021	Contractor Name:	Valard Construction LP	Group No.:	2
Owner's Representative:	A. Hacker, S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-715
<p><b>Incident Observations</b></p> <p>The following observations were made on the Project Site:</p> <p>A routine environmental inspections carried out at the Pickle Lake camp on June 20, 2021 noted the following issue:</p> <ol style="list-style-type: none"> <li>Inspection and testing labels on tanks not up to date. It is understood that Valard's environmental staff inspect the tanks weekly, however, large above-ground storage tanks require inspection by a certified inspector and a sticker placed on the tank indicating it has been inspected.</li> </ol> <p>Valard is requested to provide details of its tank inspection program.</p> <ol style="list-style-type: none"> <li>There was no recycling program implemented. This same non-compliance was observed during an environmental inspection of the Pickle Lake Camp on May 10, 2021, at which time E-14A-660 was issued.</li> </ol> <p>As specified in Valard's Non-Hazardous Solid Waste Management Plan (Schedule Q – Construction Environmental Management Plan), Contract Appendix D8 Section 6.12, and as committed to in the EA (P2-ESR-028), recyclable wastes shall be categorized and segregated on site and taken off-site to an appropriate facility for recycling.</p> <p>Valard is requested to provide an update on its recycling program and to provide specific details of implementation.</p>					
<p><b>Observation Date: June 23, 2021</b></p>					
<p><b>Owner's Representative:</b> <u>A. Hacker, S. Thompson</u> <b>Signature:</b>  <b>Date:</b> <u>June 23, 2021</u></p>					

**Contractor Response:**


See attached correspondence from Morgan Fuels in regards to annual tank inspections. Recycling stations have been setup in all Camp rooms, kitchens, and offices. As the remaining camps are constructed they will have recycling programs implemented upon opening.

Description	Date

Prepared By: Mark Ford Signature: Mark Ford Date: Oct 7, 2021

Approved By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	July 20, 2021	Contractor Name:	Valard Construction LP	Group No.:	2
Owner's Representative	R. Duffy S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-746
<b>Incident Observations</b> The following observations were made on the Project Site:					
<p>A routine environmental inspection carried out at the Pickle Lake Main Camp on June 14, 2021 noted the following issues:</p> <ol style="list-style-type: none"> <li>1. No secondary containment for motor oil.</li> <li>2. Temporary fuel tank area not adequately barricaded.</li> </ol> <p>A routine environmental inspection carried out at the Pickle Lake Material Yard on June 27, 2021 noted the following issues:</p> <ol style="list-style-type: none"> <li>1. "No Smoking" or "International No Smoking Symbol" signage present in fuel tank yard.</li> <li>2. Full jerrican with gasoline not stored in secondary containment.</li> <li>3. Stationary tank(s) with no CPPI Tag at nozzle to identify product being dispensed (round for diesel/ hexagon for gas).</li> <li>4. Non-hazardous waste containers not identified.</li> </ol> <p>Please refer to Schedule Q - Construction Environmental Management Plan - Sections 2.1 and 2.3, and Contract Appendix D-8 Section 6.11 for details of relevant commitments and obligations. Watay understands some of these non-compliances have since been rectified however Valard is requested to provide confirmation and summary of the actions completed to address these deficiencies.</p>					
<b>Observation Date:</b> June 14, June 27, 2021					
<b>Owner's Representative:</b> <u>R. Duffy, S. Thompson</u> Signature:  Date: <u>July 20, 2021</u>					



Wataynikaneyap Power Transmission Project  
Wataynikaneyap Transmission EPC Contract  
Package No. H353781-CT001

Exhibit E-14a: Field Observation and Contractor's  
Response



**Contractor Response:**

Description	Date

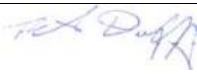

Prepared By: Mark Ford Signature: Mark Ford Date: September 1, 2021  

Approved By:   Signature:   Date:

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	July 28, 2021	Contractor Name:	Valard Construction LP	Group No.:	
Owner's Representative:	R. Duffy	Contract Title: Sr. Environmental Specialist	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-759
<b>Incident Observations</b> The following observations were made as a result of:					
While performing an Environmental Inspection on July 20, 2021 at Pickle Lake Main Camp, I found a few items that need to be addressed.					
<ol style="list-style-type: none"> <li>1. The fuel tank for the refrigeration trailer at the kitchen needs a "No Smoking" sign installed.</li> <li>2. The storage rack for the compressed gas cylinders near the tool crib should have bollard installed, to protect cylinders from vehicle traffic.</li> <li>3. Two large propane tanks near the contractor office trailers need to be properly stored away from area.</li> </ol>					
<b>Observation Date: July 20, 2021</b>					
<b>Owner's Representative:</b> <u>Rod Duffy</u> <b>Signature:</b>  <b>Date:</b> <u>July 28, 2021</u>					
<b>Contractor Response</b>					
<b>Description</b>				<b>Date</b>	
Prepared By: <u>Mark Ford</u> <b>Signature:</b>  <b>Date:</b> <u>09/27/2021</u>					
Approved By: _____ <b>Signature:</b> _____ <b>Date:</b> _____					

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	2021-08-22	Contractor Name:	Valard Construction LP	Group No.:	
Owner's Representative	Rod Duffy	Contract Title: Sr. Environmental Specialist	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-772
<b>Incident Observations</b>					
The following observations were made as a result of:					
While performing a Spill Focused Inspection at AB879 today I discovered that the site was adequately cleaned and all contaminated soil was collected in spill bags, but the bags were not removed from site. Valard should remove these bags from the ROW and store them at an approved storage facility.					
<b>Observation Date: 2021-08-22</b>					
<b>Owner's Representative: Rod Duffy</b> Signature:  Date: 2021-08-22					
<b>Contractor Response</b>					
Indicate your response to the above-noted items and specify dates by which a response will be provided for each item to ensure compliance with the Contract Appendix D8, Schedule Q, and the updated Environmental and Social Management Plan.					
<b>Description</b>				<b>Date</b>	
Prepared By: <u>    Mark Ford    </u>		Signature: <u></u>		Date: <u>  09/01/2021  </u>	
Approved By:    _____		Signature:    _____		Date:    _____	






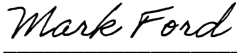




## EXHIBIT E-14a

### Environmental and Permitting


#### Field Observation and Contractor's Response

Date:	August 22, 2021	Contractor Name:	Valard Construction LP	Group No.:	1
Owner's Representative	Tom Harty	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-773
<b>Incident Observations</b> The following observations were made on the Project Site:  While conducting a site environmental inspection today at Sub A, I observed 2 pails of drill oil stacked on top of each other without secondary containment.  Oil should be stored in a secure place with secondary containment in place.  Picture is attached.					
<b>Observation Date: August 22, 2021</b>					
<b>Owner's Representative:</b> Tom Harty <b>Signature:</b>  <b>Date:</b> August 22, 2021					
<b>Contractor Response</b> Indicate your response to the above-noted items and specify dates by which a response will be provided for each item to ensure compliance with the Contract Appendix D8, Schedule Q, and the updated Environmental and Social Management Plan.					
<b>Description</b>			<b>Date</b>		
Contractor Site Manager: <u>Mark Ford</u>		Signature: 		Date: <u>09/01/2021</u>	
Contractor Project Manager: _____		Signature: _____		Date: _____	



Oil pails stacked in crate along the side of the road.

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	October 8, 2021	Contractor Name:	Valard Construction LP	Group No.:	all
Owner's Representative:	S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-859
<b>Incident Observations</b> The following observations were made on the Project Site:					
<p>In July 2021, Watay received comments indicating that proper clean-up and garbage disposal is not adequately being ensured on site. Watay has also received comments indicating that Valard has had fewer Environmental Monitors working on the Project during the summer months to adequately enforce garbage disposal requirements.</p> <p>Valard is requested to provide confirmation that a sufficient number of environmental monitors are present on site or if these comments are accurate, a commentary on why fewer Environmental Monitors are required during the summer months.</p>					
<b>Observation Date: October 8, 2021</b>					
					

**Contractor Response:**


Valard Environment provides an EM for active camps, where active work is happening. We will not be providing 'garbage watchers' where there is no active construction occurring. There are less monitors on the ground during the summer months because there is less work happening during the summer months.

Description		Date

Prepared By:     \_\_Mark Ford     Signature: Mark Ford     Date: 10/15/21\_\_

Approved By:     \_\_\_\_\_     Signature: \_\_\_\_\_     Date: \_\_\_\_\_

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	October 8, 2021	Contractor Name:	Valard Construction LP	Group No.:	all
Owner's Representative:	S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A- 860
<b>Incident Observations</b> The following observations were made on the Project Site:					
<p>In July 2021, Watay heard concerns that Valard employees were feeding bears, and that in one case (December 2020) this practice led to two bears in segment AB needing to be euthanized.</p> <p>Valard is requested to provide confirmation that all staff are receiving appropriate training regarding interacting with wildlife. Valard is also requested to indicate whether staff were informed of the incident in December 2020 and if the importance of not feeding wildlife was reinforced at that time. Watay requests that the issue of feeding wildlife be added to the agenda for morning tailgate meetings at regular frequencies.</p>					
<b>Observation Date: October 8, 2021</b>					
					



**Contractor Response:**

This is not accurate. All staff are reminded daily at tailboards, and in our weekly safety meetings. Bulletins are posted in offices....there are plenty of resources of information to not feed wildlife on the project. Two Bears were not euthanized. A conservation officer was met on site to consult on a lone bear cub in October of 2020 (is this even the event being referred to?). The cub was left for nature to take it's course by the recommendation of the MNRF conservation officer, who was on the project assisting.

Description	Date

Prepared By: Mark Ford Signature: Mark Ford Date: 10/15/21

Approved By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	October 25, 2021	Contractor Name:	Valard Construction LP	Group No.:	All
Owner's Representative:	S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-881


**Incident Observations**  
The following observations were made on the Project Site:

In July 2021, Watay received comments indicating that waste was being left at multiple structure locations and often buried during final earthworks. HATCH-VAL-RFI-0433 noted one location in particular where waste was observed near a structure. Valard's response to this RFI confirms that site has since cleaned up.

Valard is requested to provide confirmation that waste is not being buried at structure foundations and to describe any action that will be taken to avoid this issue in the future.

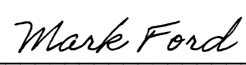
This E-14A was issued as a result of a concern raised and response is required in order to close item.

**Observation Date: October 25, 2021**

**Owner's Representative:** S. Thompson Signature:  Date: October 25, 2021

**Contractor Response:**

Description	Date

Prepared By: Mark Ford Signature:  Date: 11/03/21

Approved By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

## EXHIBIT E-14a

### Environmental and Permitting

#### Field Observation and Contractor's Response


Date:	October 18, 2021	Contractor Name:	Valard Construction LP	Group No.:	2
Owner's Representative:	R. Duffy	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-883
<b>Incident Observations</b> The following observations were made:  The following non-compliances were identified during a routine environmental inspection at the Pickle Lake material yard on October 18, 2021: <ul style="list-style-type: none"> <li>• Fuel hoses not neatly stored</li> <li>• No spill kit at generator fuel location</li> <li>• Drip bucket for fuel nozzle is full of water and fuel. (see attached photo)</li> <li>• Fuel nozzle on mobile fuel truck not stored properly (not in secure and upright location) (see attached photo)</li> <li>• Jerricans not stored properly (not in spill trays) (see attached photo).</li> </ul> Response is required with actions taken to address the above mentioned findings.					
<b>Observation Date: October 18, 2021</b>					
<b>Owner's Representative:</b> <u>R. Duffy/S. Thompson</u> <b>Signature:</b>  <b>Date:</b> <u>October 25, 2021</u>					
<b>Contractor Response</b>					
<b>Description</b>			<b>Date</b>		
Prepared By: <u>Mark Ford</u> <b>Signature:</b>  <b>Date:</b> <u>_11/03/21_</u>					
Approved By: _____ <b>Signature:</b> _____ <b>Date:</b> _____					



Figure 1: Drip bucket for fuel nozzle is full of water and fuel





Figure 2: Nozzle for mobile fuel tank not properly stored





**Figure 3: No secondary containment**

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	November 10, 2021	Contractor Name:	Valard Construction LP	Group No.:	all
Owner's Representative:	S. Thompson	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-916
<b>Incident Observations</b> The following observations were made on the Project Site:					
In July 2021, Watay received comments indicating that waste was being left at multiple structure locations, and often buried during final earthworks. Valard responded to E-14A-881 on November 3, 2021 indicating that crews are reminded daily of good housekeeping and proper waste disposal practices.  Valard is requested to describe how waste is managed, provide a sample waste manifest/report, and to confirm that waste is not being buried.					
<b>Observation Date: November 10, 2021</b>					
<b>Owner's Representative:</b> <u>S. Thompson</u> Signature: <u></u> Date: <u>November 10, 2021</u>					
<b>Contractor Response:</b>					
<b>Description</b>					<b>Date</b>
Prepared By: <u>Mark Ford</u> Signature: <u></u> Date: <u>11/17/2021</u>					
Approved By: _____ Signature: _____ Date: _____					

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	December 10, 2021	Contractor Name:	Valard Construction LP	Group No.:	all
Owner's Representative:	S. Muir	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-999
<b>Incident Observations</b> The following observations were made: <b>During routine environmental inspection at the Sioux Lookout Camp and yard on December 8, 2021 the following deficiencies were observed:</b> <ul style="list-style-type: none"> <li>• Camp waste not being managed properly. Garbage not being regularly emptied in the office trailers.</li> <li>• Recycling program not implemented. Follow up on recycling efforts. Streams are segregated but there may not be any actual recycling program in place.</li> <li>• Spill prevention material not located in waste storage area.</li> <li>• Hazardous liquid waste (antifreeze) stored without a secondary containment.</li> <li>• Hazardous waste containers labeled with contents but missing the safe handling/transportation procedure. Some without any visible labels.</li> <li>• Hazardous waste storage and shipment time limits not met.</li> <li>• Access to hazardous waste area not restricted.</li> <li>• Fuel hoses not neatly stored. Fuel nozzle stored in can, not holster.</li> <li>• Written spill procedures not available at refueling site.</li> <li>• No record of weekly fuel tank visual inspection for leaks or damage.</li> <li>• Inspections (extinguisher/fuel tanks) not up to date.</li> </ul> <b>During routine environmental inspection at the Pickle Lake Camp, Material Yard and Substation B on December 10, 2021 the following deficiencies were observed:</b> <ul style="list-style-type: none"> <li>• Waste is being managed, however no recycling program is in place. There are recycling receptacles, but no plan for disposal.</li> <li>• Containers with liquid hazardous waste not stored with proper sized secondary containment.</li> <li>• Fuel tanks not in good condition. Gas tank at Pickle Lake offices showing visible signs of corrosion/rust. Valard is required to provide records of inspections for review.</li> <li>• No record of weekly fuel tank visual inspection for leaks or damage.</li> <li>• Stationary equipment (overnight) require spill trays.</li> </ul>					

**During routine environmental inspection at the Pipestone Camp on December 11, 2021 the following deficiencies were observed:**

- Recycling program not implemented.
- Written spill procedures not available at refueling site.
- Leaking sewage pipe under rec room trailer.
- Mobile fuel truck parked at the material yard was missing the placard at the front of the vehicle.

**During routine environmental inspection at the Substation C on December 11, 2021 the following deficiencies were observed:**

- Generator associated fuel tank and hoses not in good condition.
- Effective drip pans not available for servicing and leaks.
- Parked equipment without spill tray underneath. Visible drips present in the snow.
- Generator and surrounding area covered with a spray of diesel.

**During routine environmental inspection at the Dinorwic Substation A on December 12, 2021 the following deficiencies were observed:**

- Stationary equipment (overnight) require spill trays.
- Mobile fuel truck parked at the material yard was missing adequate fuel nozzle storage.
- Propane tank not properly stored, left on the ground by the mobile fuel truck.

**During routine environmental inspection at Balmer Structure 26 to 28 on December 13, 2021 the following deficiencies were observed:**

- Jerricans in the back of the truck not placed within spill trays.

**During routine environmental inspection at Junction Camp and Red Lake yard on December 13, 2021 the following deficiencies were observed:**


- Compressed gas tanks not properly stored.
- Spill trays not being used while refueling. Various small spills around the fuel tanks.
- Woody debris not being cleared.
- Recycling program not implemented.
- Spill reported under light plant generator by fuel tanks (EIR 293 – clean up complete).
- Jerricans left in snow (Junction - outside camp maintenance shed; Material yard – outside offices).

Valard is requested to provide evidence of how the abovementioned deficiencies have been addressed and/or provide details on how Valard plans to address them.

**Observation Dates:** December 8, 10, 11, 12 and 13, 2021

**Owner's Representative:** S. Thompson **Signature:**  **Date:** December 21, 2021

**Contractor Response**

Description		Date
Prepared By: <u>Mark Ford</u> Signature: <u></u> Date: <u>1/18/2022</u>		
Approved By: _____ Signature: _____ Date: _____		





**Photo 1: Sioux Lookout Camp and yard – Extinguisher by fuel tank does not have an inspection log.**



**Photo 2: Sioux Lookout Camp and yard – One can labeled as antifreeze. Liquid hazardous waste requires a sufficient secondary containment. Each container should be labeled with contents as well as safe handling procedure.**





Photo 3: Sioux Lookout Camp and yard – Hazardous waste container too full to close.



Photo 4: Sioux Lookout Camp and yard – Gas nozzles left in can, not in the holster.



**Photo 5: Sioux Lookout Camp and yard – Fuel truck (third party) came by and started refueling. No spill tray was used, missing PPE (glasses).**



**Photo 6: Sioux Lookout Camp and yard – Jerricans stored without secondary containment. Missing WHMIS workplace label. Discussed with camp manager – Jan.**



**Photo 7: Pickle Lake Camp, Material Yard and Substation B – Gas tank by the Pickle Lake office, showing signs of corrosion/rust. Spoke with Katey and she confirmed it is only superficial. Need inspection logs to verify.**



**Photo 8: Pickle Lake Camp, Material Yard and Substation B – Contaminated liquid waste (drip tray water) stored without secondary containment.**



Photo 9: Pickle Lake Camp, Material Yard and Substation B – Hazardous waste containment and signage.



Photo 10: Pickle Lake Camp, Material Yard and Substation B – Mobile fuel truck parked at the material yard was missing the placard at the front of the vehicle.





**Photo 11: Pipestone Camp – Leaking pipe under rec trailer.**



**Photo 12: Pipestone Camp – Alicia noted that there were other empty containers they will use to relocate the overflowing containers.**





Photo 13: Substation C – Drips under parked equipment; require spill tray.



Photo 14: Substation C – Diesel sprayed from generator. Covering the surrounding area (snow, building, pole). Clean-up required.

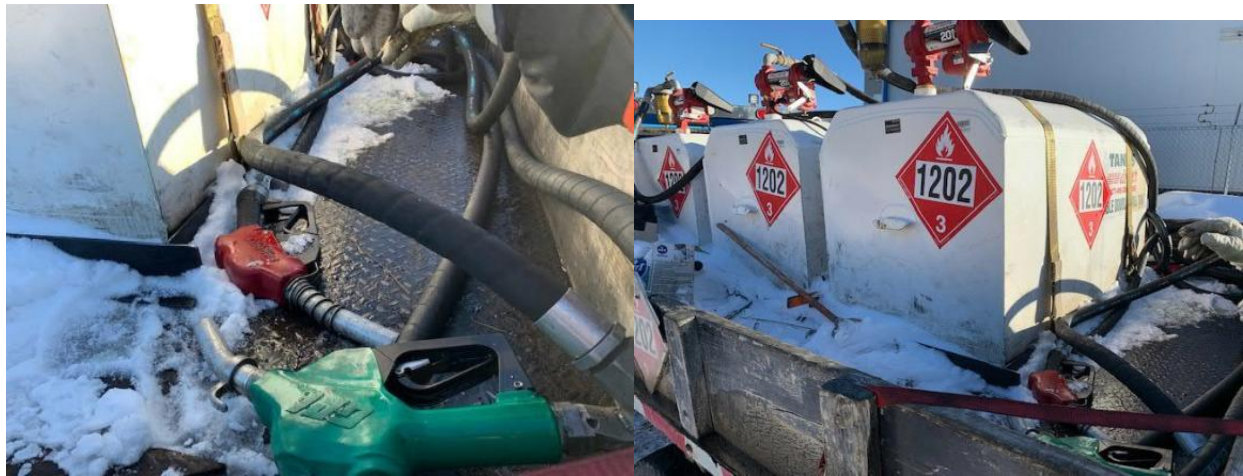


Photo 15: Substation A – Fuel nozzles leaking in back of fuel truck. Licence plate CHU 95.



Photo 16: Balmer Structure 26 to 28 – Jerricans bouncing in back of pickup truck, not placed in a spill tray.





**Photo 17: Junction Camp – Woody debris plowed to the side, left in the snowbanks.**



**Photo 18: Junction Camp – Compressed gas cylinders not stored properly.**



**Photo 19: Junction Camp – Various small drips around the fuel tanks.**





Photo 20: Junction Camp/Red Lake Yard – Jerricans missing secondary containment and labels.



## EXHIBIT E-14a

### Field Observation and Contractor's Response

Date:	January 25, 2022	Contractor Name:	Valard Construction LP	Group No.:	1
Owner's Representative:	Tagore Ranganathan	Contract Title:	Engineering, Procurement and Construction Contract dated as of [Date] between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-1041
<b>Incident Observations</b> The following observations were made on the Project Site at Dinorwic Substation (Station A)					
<p>Approximately 10 L of oil was spilled to the ground during unpacking and detaching from the crate the top portion of a 230kV CVT.</p> <p>Valard is requested to provide confirmation of spill cleanup.</p>					
<b>Observation Date: January 22, 2022</b>					
<b>Owner's Representative:</b> Tagore Ranganathan/S. Thompson Signature:  Date: Jan. 25, 2022					
<b>Contractor Response</b> Indicate your response to the above-noted items and specify dates by which a response will be provided for each item to ensure compliance with the Project Health and Safety Management System.					
<b>Description</b>			<b>Date</b>		
EIR and EIN Notification email attached. All spills are reported through our EIN/EIR process, E-14A reports should not be issued for spills.					
Prepared By:	Mark Ford	Signature:		Date:	Feb 18, 2022
Approved By:		Signature:		Date:	

## EXHIBIT E-14a

### Field Observation and Contractor's Response

Date:	February 4, 2022	Contractor Name:	Valard Construction LP	Group No.:	1
Owner's Representative:	Daniella Lima	Contract Title:	Engineering, Procurement and Construction Contract dated as of [Date] between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-1055
<p><b>Incident Observations</b></p> <p>The following observations were made during an inspection conducted by the Ministry of Northern Development, Mines, Natural Resources and Forestry (NDMNRF) on Friday, December 17, 2021.</p> <p>The majority of the crossings inspected had no major concerns, however, the NDMNRF identified issues with 4 crossings and noted that several crossing structures that were installed deviated from the weekly water crossing table provided by Valard. Deviations included structure not installed, wrong location, or incorrect structure installed.</p> <p>Valard is requested to provide evidence that all RoW Coordinators have a full understanding of the weekly water crossing reporting procedures and Valard's obligations in the <i>Code of Practice for Access and Water Crossings</i>. Valard is requested to list all measures that are being taken to guarantee that watercrossings installed are compliant with the Watercrossings Protocol and what actions have been taken to prevent similar issues from occurring in the future. Please also include actions taken to communicate the requirements of the Code of Practice to staff.</p> <p>Valard is also requested to provide evidence that internal snow plowing practices/protocols have been updated to reinforce the issues of plowing before the ground is frozen in areas adjacent to water crossings and to provide evidence that communication was issued to construction crews. Valard is requested to list any other measure taken that can prevent this from occurring in the future.</p> <p>WTX ID 395 and 398 were considered unauthorized structures. The NDMNRF requested that these crossings be removed and replaced with an approved structure as outlined in the Watercrossings Protocol. Valard is requested to provide evidence that these crossings were removed/replaced with approved crossings.</p> <p>Valard is also requested to provide evidence that a Valard HSE representative is closely monitoring the installation and removal of any temporary crossings or work near watercourses as per section 7.2. <i>BMPs for watercourses, riparian areas and wetlands from Valard's EMP</i> in accordance with the approved Watercrossings Protocol and the following the EA and ESR commitments:</p>					

Commitment ID	Location in the EA/ESR Report	Commitment
P1-EA-262	Section 6.2	Environmental Inspectors will be on site during construction to monitor the installation, use, and removal of temporary equipment waterbody crossing structures. Turbidity and total suspended solids monitoring may be required at a subset of crossings to meet regulatory requirements.
P1-EA-500	Appendix 3.10A; Section 7.4	Install, monitor and manage erosion and sedimentation control measures at waterbody crossings to prevent erosion.
P2-ESR-ESMP-20	Phase 2 Final Environmental Study Report	Environmental Monitors will be on site during construction to monitor the installation, use, and removal of temporary equipment waterbody crossing structures.
P2-ESR-ESMP-21	Phase 2 Final Environmental Study Report	Environmental Monitors will be on-site during construction to confirm that all waterbodies crossed by the 40-m-wide transmission line alignment RoW and access roads have been identified and documented in the waterbody crossing lists (Appendix 6.2A: Tables 6.2A-1A and B, 6.2A-2A and B, and 6.2A-3A and B) and will monitor the installation, use, and removal of temporary equipment waterbody crossing structures. The Environmental Monitors will confirm that the appropriate waterbody crossing structure is being used, that the proper restricted activity timing window is being applied and that all approvals and permits are in place. If unidentified waterbodies are encountered, engage an Aquatics Specialist to determine the appropriate crossing methods, proposed restricted activity timing window, and approvals or permits required.

**Observation Date:** December 17, 2021

**Owner's Representative:** Daniella Lima **Signature:** Daniella N. de Lima **Date:** February 4, 2022

**Contractor Response**

Description	Date

Prepared By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Approved By: \_\_\_\_\_ Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**EXHIBIT E-14a**  
**Environmental and Permitting**  
**Field Observation and Contractor's Response**

Date:	April 11, 2021	Contractor Name:	Valard Construction LP	Group No.:	3
Owner's Representative:	Richard Dodd	Contract Title:	Engineering, Procurement and Construction Contract dated as of September 6 <sup>th</sup> , 2019 between Wataynikaneyap Power LP and Valard Construction LP (the "Contract")	No.	E-14A-1156
<b>Incident Observations</b> The following observations were made as a result of: A site visit to Dinorwic Substation A on March 28, 2022 identified the following non-compliances: <ul style="list-style-type: none"> <li>Gas cylinders lying on the ground (cylinders need to be stored properly whether they are full or empty, i.e., upright, in a lockable, fenced area on a raised non-combustible platform). See photo below.</li> <li>Tank inspection/testing labelling missing. No records of regular tank inspections.</li> <li>Fuel storage tanks not protected from vehicular impact (barricades need to be put in front of fuel cube and any mobile tanks should be parked away from vehicular traffic).</li> <li>No CPPI tag at nozzle to identify product being dispensed.</li> <li>No spill prevention and response plan available. Workers are not aware of where the plan is.</li> </ul> During a follow-up visit on April 7, 2021, it was observed that some non-compliances had been addressed, however, Valard is requested to confirm at this time that there are no outstanding non-compliances.					
<b>Observation Date:</b> March 28, 2022					
<b>Owner's Representative:</b> <u>R. Dodd/S. Thompson</u> Signature: <u><i>Richard Dodd</i></u> Date: <u>March 28, 2022</u>					
<b>Contractor Response</b>					
<b>Description</b>				<b>Date</b>	
Prepared By: <u>Mark Ford</u> Signature: <u><i>Mark Ford</i></u> Date: <u>May 10, 2022</u>					
Approved By: _____ Signature: _____ Date: _____					



Cylinders lying on the ground at Dinorwic Substation A March 28, 2022