



File OF-Fac-Oil-E101-2014-11 04
22 November 2017

Mr. Guy Jarvis
President
Enbridge Pipelines Inc.
Suite 200, 425 – 1 Street SW
Calgary, AB T2P 3L8
Email: [REDACTED]

Dear Mr. Jarvis:

**National Energy Board review of Enbridge Pipeline Inc. (Enbridge)
Corrective Action Plan (CAP) developed in response to the 2017
Enbridge Pipeline Inc. - Pre-construction Readiness Audit**

The National Energy Board (NEB or Board) has concluded its review of Enbridge's CAP as submitted by letter 2 November 2017. The Board evaluated the corrective actions in order to verify that the proposed actions would address the deficiencies noted and prevent recurrence.

The Board notes that of the 37 audit protocol items only one finding of non-compliance was identified during the audit which resulted in 3 corrective actions proposed by Enbridge.

Summary of Corrective Action Review

The Board has evaluated the CAPs separately and assigns each CAP one of the three following results:

1. Approved
2. Approved with additional direction.
 - a. In these cases, the Board accepts the company's proposed CAP as part of the corrective action and, in addition, directs that the company take further action.
3. Rejected due to lack of clear deliverables. Additional detail is required from the company in order to ensure that the identified deficiencies are addressed.

The following table provides a summary of the results for the Enbridge CAP.

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Result	# of results	Enbridge Corrective Action #
Approved	3	Enbridge CA #: 1, 2 and 3

For a detailed summary of the analysis and results, please see table below.

Item	Reference	NEB Finding of Non-compliance	Enbridge CA#	Corrective Actions	Target Completion Date	Actual Completion Date
1	AP-Enbridge 23 - Has the company established a process to communicate corrective actions and learnings to ensure employees or persons working on behalf of the company are informed?	General Finding: Enbridge has established communication process to communicate corrective actions and learnings for safety related items; however this process was not clearly defined for environmental corrective action and learnings. NEB's Conclusion: Based on the scope of the audit, the Board found Enbridge to be non-compliant with the requirement of the OPR s. 6.1(r) and (u) at the time of the audit.	1	Updated the Projects Safety Management Plan to reflect how and when both safety and environment corrective actions and leanings are communicated.	July 28, 2017	July 28, 2017
			2	Sent a communication to all project Environmental personnel involved to reinforce the Process.	Aug 9, 2017	Aug 9, 2017
			3	Identifying further documented edits to the Environmental Protection Plan to be included in next revision cycle	Aug 9, 2017	Aug 9, 2017

The CAP Review Process

The Board notes that Enbridge has already submitted the deliverables as outlined by Enbridge's CAP. The NEB will review the documents and deliverables as outlined by Enbridge's CAP. Each finding will be considered resolved when all of the deficiencies as described in the report have been addressed in accordance with the legal requirements and the commitments and the actions described in the CAP. An Implementation Assessment meetings may be organized to discuss actions taken.

In addition, the Implementation Assessments will address the following:

- Enbridge has listed its corrective actions as "complete". The Board requires a review of the related documentation and actions taken to determine whether these actions sufficiently address the deficiencies. Further actions may be required to ensure that Board expectations are met.
- The Board will verify that the CAPs are systemically applied and include measures to prevent recurrence.

The Board will make the CAP public and will continue to monitor and assess all of Enbridge's corrective actions with respect to this audit until they are fully implemented. The Board will also continue to monitor the implementation and effectiveness of its oversight measures for the Line 3 replacement project through targeted compliance verification activities as a part of its on-going regulatory mandate.

In the coming days, the Lead Auditor will contact Enbridge's representative whom we have copied on this letter to arrange the document review for the CAP. If you require any further information or clarification, please contact Barbara Wegernski, Lead Auditor, at 403-299-3151.

Yours truly,

Original signed by L. George for

Sheri Young
Secretary of the Board

c.c. [REDACTED] Manager, Pipeline Compliance
Email [REDACTED]