

January 20, 2017

Client File No. 5624.00  
Licence No. 3120

Ms. Tracey Braun  
Director  
Environmental Approvals  
Manitoba Sustainable Development  
Suite 160, 123 Main Street  
Winnipeg, MB R3C 1A5

Dear Ms. Braun:

**RE: Lake Winnipeg East System Improvement (Licence 3120) – Licence Condition # 33**

Condition 33a of the Lake Winnipeg East System Improvement Transmission Project *Environment Act* Licence #3120, states, “The Licencee shall establish any fuel storage areas required for the construction and operation of the Development a minimum distance of 100 metres from any waterbody.” This letter serves to request an exception to this licence condition as described below.

Manitoba Hydro is requesting permission to refuel equipment onsite within LWE-Aqua-123 riparian area at structures 2 and 3, which are within 100 metres of the river, during foundation installation as per the attached maps and photos. Both sides of the river where this may occur are Manitoba Hydro property.

Due to the extreme cold expected in this region continuous heat is required to allow concrete to cure to engineered specifications. Removing heaters or even exchanging heaters at this phase could potentially result in compromising the structural integrity of the foundations. Therefore, the heating units need to be refueled in situ to ensure that there is no break in the heating of these foundations.

In addition to the heaters described above, rock drills will also require top-up fueling while they are set-up on a hole. In extreme cold the over use of hydraulic systems, like the one used to lower and raise the boom of the drill to move the unit, elevates the risk of potential failure and spillage. Spillage in this system could easily exceed provincially reportable levels. Having to move rock drills to re-fuel in lieu of re-fueling onsite, would be slow and labor intensive, potentially impact the accuracy of the drilling, and elevate the risk of potential failure and spillage.

Should this request to fuel onsite within 100 metres of a waterbody be approved, the

following additional mitigation measures will be implemented:

- Refueling will only occur in the designated area as show on attached maps 2 and 3.
- A containment berm will be installed along the downslope side of the refueling area. The berm will be constructed out of snow;
- An “all hands on deck” situation will be implemented during fueling. All additional works in the immediate area will be halted and workers will be available to attend to any amount of spillage;
- An environmental monitor will be onsite at all times to document the site conditions before, during and after fueling;
- Fuel volumes will not exceed the capacity of a single tidy tank (~300L) and will be transported in a pickup capable of carrying the weight;
- Transport pickup and tidy tank will leave site promptly once fueling is complete;
- Tidy tank will be double walled or in secondary containment to 110% of the volume stored (~300L);
- Crews will be familiar with the 6 steps to spill response (as listed in the project EPP);
- All equipment will be inspected for leaks, frayed hoses and loose fittings before operating;
- Industrial sized spill kit will be present onsite during activities and crews made aware of location of kit and spill procedures;
- When refueling, spill trays and drip rags will be in place to catch any potential drips;
- Two persons will be utilized during refueling - one operator at the switch and another operator at the pump;
- The operator will not lock the nozzle and will remain at the pump during refueling; and
- Crew foremen will be briefed on the mitigations and signoff on the plan indicating their understanding.

Should you have any questions or require further clarification of our request please do not hesitate to contact me at 204-360-4394.

Regards,

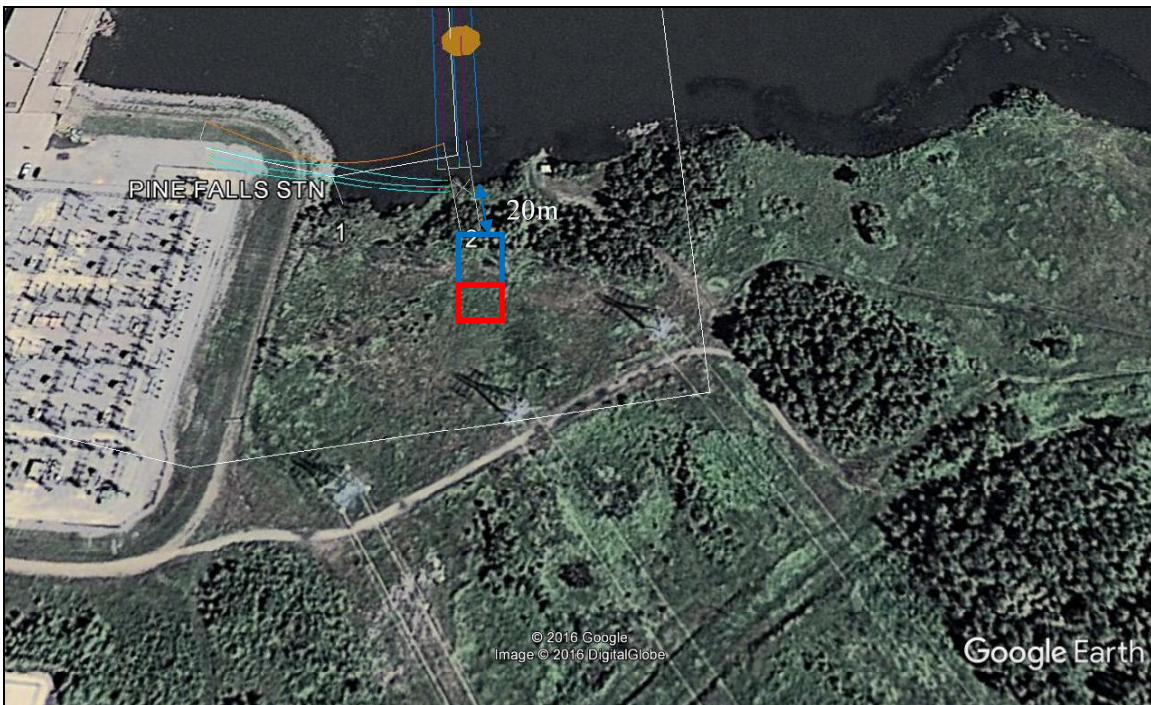
***Original signed by***

Shannon Johnson  
Manager  
Licensing and Environmental Assessment Department  
Manitoba Hydro  
820 Taylor Ave (3)  
Winnipeg, Manitoba  
R3M 3T1

Attachments: 1 – Maps and photos



Map 1: Location of structures within the riparian area of LWE-Aqua-123



Map 2: Work area near Str. 2. Blue shows position of drill rig, red shows location of fueling.



Map 3: Work area near Str. 3. Blue shows location of drill, red shows location of refueling.



Photo 1: Example of drill unit to be used



Photo 2: Location of Structure 2 indicated by orange flagged stake.

Photo 3: Location of Structure 3 indicated by orange flagged stake.

