EXHIBIT D ROUTING AND ENVIRONMENTAL

1. ROUTE SELECTION

1. The following general criteria were used in selecting the proposed pipeline route and construction methods:
    - The existing Imperial easement will be followed as closely as possible to minimize impacts on current land uses.
    - Existing Imperial valve surface locations will be used wherever possible to minimize the footprint of above-grade facilities.
    - The new pipeline will tie into additional new SPPL installations, such as Credit River Crossing and Finch Avenue realignment which are anticipated to be completed prior to construction.
2. The route evaluation and decision are supported by desktop studies, field survey information, various physical, environmental, and socio-economic field surveys, consultation with regulators and other stakeholders, and constructability reviews.
3. Because the Project will be sited within an existing Imperial easement from KP 0 to KP 18.8, an alternative route was considered only within the urban area from KP 18.8 to KP 62.5. This alternative route underwent detailed review, but was deemed not feasible because in comparison to the proposed project route it:
    - increases the length of the pipeline route by more than 14 km (a 22 percent increase);
    - crosses nearly two times as many watercourses;
    - crosses three times as many wetlands;
    - crosses an additional urban river park;
    - crosses five more railroads;
    - passes within 100 m of twice as many groundwater supply wells;
    - has 450 per cent more wildlife species of conservation concern records within one km;
    - crosses two additional conservation areas;
    - requires 10 more HDDs and nine more bores; and
    - crosses an area deemed not feasible to construct (through York University on Keele Street).
4. The proposed pipeline route was determined to be the only reasonable option, particularly within the urban landscape, because it benefits from following existing utility corridors.
5. The proposed route may be subjected to minor adjustments based on feedback of continued environmental, socio-economic input, and stakeholder consultation. For example, the following key inputs from consultation (Environmental Report Section 3 Consultation) were considered in pipeline routing and construction methods:
    - Consultation with the MNRF identified the need to schedule construction outside of sensitive timing windows for species at risk (“SAR”), limit disturbance within regulated habitat and, in some cases, utilize trenchless construction.
    - The identification of alternative construction methods such as HDD and HDB to avoid sensitive surface areas: deploying trenchless construction methods at identified river crossings and in areas of high archaeological potential to avoid impacts to known sites; deploying HDB to avoid impacts to paved roadways and disruption to traffic, where possible.

- The identification of Provincially Significant Wetlands (“PSWs”) changed the planned construction method from trenched to trenchless in certain areas with these features.
- Engagement with HONI identified the need to re-route the pipeline centreline within their utility ROW to protect power transmission infrastructure.
- Consultation with stakeholders identified the need for route deviation from urban residential properties and areas of congested utility infrastructure.

2. ENVIRONMENTAL REPORT

6. The ER was prepared in accordance to the OEB's *Environmental Guidelines for the Location, Construction, and Operation of Hydrocarbon Pipelines and Facilities in Ontario, 7th Edition (2016)* (Environmental Guidelines). The ER is a component of the LTC application for the Project. The ER describes the actions taken to date to confirm the project location, or route, for the pipeline and related construction methods and activities, considering the physical, environmental, socio-economic, archaeological, and cultural heritage conditions. Mitigation measures designed to minimize environmental and community impacts were also developed as part of the study.

7. On Feb. 1, 2019, an electronic copy of the ER was submitted during the pre-application filing to the OPCC for their early review and comment. TRCA and Conservation Halton requested a hard copy of the ER and Imperial mailed a hard copy version of the ER on the same day. The OPCC is an inter-ministerial committee chaired by the OEB and comprises provincial government ministries, authorities, and boards with potential interest in the construction and/or operation of hydrocarbon transmission facilities in Ontario. The list of OPCC members and additional regulatory agencies who received an electronic copy of the ER include:

    - Ontario Energy Board (OPCC Chair)
    - Infrastructure Ontario
    - Conservation Authorities
    - Conservation Halton
    - Credit Valley Conservation Authority
    - Hamilton Conservation Authority
    - Toronto and Region Conservation Authority
    - Ministry of Agriculture, Food, Rural Affairs
    - Ministry of Economic Development, Job Creation and Trade
    - Ministry of Energy, Northern Development and Mines
    - Ministry of Environment, Conservation and Parks
    - Ministry of Municipal Affairs and Housing
    - Ministry of Municipal Affairs, Municipal Services Office - East and West
    - Ministry of Natural Resources and Forestry
    - Ministry of Tourism, Culture and Sport
    - Ministry of Transportation
    - Niagara Escarpment Commission
    - Technical Standards and Safety Authority
    - Federal authorities
    - Fisheries and Oceans Canada
    - Transport Canada

8. On Feb. 1, 2019, an electronic copy of the ER was submitted to the following municipalities within the Project area:
    - City of Burlington
    - City of Hamilton
    - City of Hamilton
    - City of Mississauga
    - City of Toronto
    - Halton Region
    - Region of Peel
    - Town of Milton
    - Town of Oakville
9. On Feb. 1, 2019, an electronic copy of the ER was submitted to Indigenous communities. Imperial hand delivered a hard copy version of the ER to MCFN, Six Nations and HCCC/HDI. Imperial provided a courier mail hard copy of the ER to Huron-Wendat.
    - Huron-Wendat Nation
    - Mississaugas of the Credit First Nation
    - Six Nations of the Grand River
        - Six Nations Elected Council (Lands and Resources Department)
        - Haudenosaunee Confederacy Chiefs Council/ Haudenosaunee Development Institute
10. For ease of access, the OEB will make an electronic version of the ER available on its Regulatory Electronic Submission System (“RESS”) application website.
11. Imperial is committed to sharing Project updates as they became available. In addition to posting project information on OEB’s RESS application website, Imperial will provide electronic copies of the ER and LTC exhibits on Imperial’s Project website at the following link, www.imperialoil.ca/waterdowntofinch

3. ENVIRONMENTAL PROTECTION PLAN

12. An Environmental Protection Plan (“EPP”) and several management and contingency plans will be developed prior to construction. The purpose of the EPP is to clearly outline the management of the environmental programs during construction in an effective, systematic and documented manner. These plans will build on the key mitigation measures for the Project identified in the ER. The EPP includes the applicable requirements and compliance procedures, organizational structure, specific roles and responsibilities, procedures for training personnel, inspection and reporting, and other processes and procedures to maintain environmental compliance. It provides the standards and processes to mitigate, manage and monitor for potential environmental effects.

13. The EPP guides environmental management during construction of the Project and will be progressively developed and implemented as the Project moves through the permitting and construction phases.

14. The EPP will include a number of Environmental Management Plans (“EMPs”) that will include Project-specific commitments to date, permit approval terms and conditions, and other applicable regulatory requirements. The EPP and EMPs form the basis for what will be implemented during construction.

4. ARCHAEOLOGY ASSESSMENT

15. The purpose of the Stage 1 archaeological assessment was to evaluate the archaeological potential of the study area and present recommendations for the mitigation of any significant known or potential archaeological resources. To this end, historical, environmental and archaeological research was conducted to enable a determination of archaeological potential. This research was augmented by a site inspection undertaken Nov. 15 - 18, 2017 to investigate and confirm areas of obvious recent disturbance.

16. The Stage 1 archaeological assessment determined that much of the study corridor contains areas of archaeological potential for both pre-Contact and post-Contact archaeological resources. Sections of the corridor, however, exhibit areas of extensive subsurface disturbance and therefore no longer hold archaeological potential. In addition, some sections have been subject to previous archaeological assessments that have cleared these areas of archaeological concerns.

17. A draft copy of the Stage 1 Archaeological Assessment report was provided to MCFN, Six Nations, HCCC/HDI and Huron-Wendat for review and comment. To date, MCFN and Huron-Wendat provided comments on the draft report.

18. MCFN provided comments on the draft Stage 1 Archaeological Assessment Report, and noted that their review identified no major concerns regarding Stage 1. MCFN provided some minor comments and clarifications which were further discussed during a teleconference meeting on Nov. 13, 2018:

    - MCFN noted that the Project is on MCFN's traditional territory and commented that, while MCFN acknowledges that the Parsons site is an ancestral Huron-Wendat village, it is imperative that MCFN participate in field work and monitoring required for the site to support the long-term care and protection. In response, Imperial agreed to modify the wording in the draft Stage 1 report to more clearly reflect MCFN's assertions on its traditional territory, and Imperial reiterated its recognition that the Parsons site is located within shared traditional territory and that the company fully understands that MCFN will participate in field work and monitoring, and will be consulted on mitigation strategies related to the site.

    - MCFN requested clarification on the Stage 2 study scope of work relating to access routes and temporary work spaces. In response, Imperial agreed that if access routes and temporary work spaces are added or altered, the project study area will be amended as necessary so that the archaeological assessment includes the full project footprint, and areas determined to have archaeological potential will be subject to further archaeological assessment.

    - MCFN also requested that the draft Stage 1 Archaeological Assessment report be redacted to protect the identification of mapped archaeological sites if the report is made publicly available. In response, Imperial noted it will submit an appropriately redacted version of the Stage 1 Archaeological Assessment report to MTCS to ensure that sensitive information is not made public. A hardcopy confidential version of the Stage 1 Archaeological Assessment report is also provided to MTCS.

19. Huron-Wendat provided comments on the draft Stage 1 Archaeological Assessment report. Huron-Wendat noted that a significant Huron-Wendat recorded archaeological site is located within the study area (i.e., the Parsons site). The Huron-Wendat review noted that the draft Stage 1 report offered generally complete summaries of the pre and post-Contact history of the region, that the report regularly referred to the appropriate *Standards and Guidelines for Consultant Archaeologists* (MTCS 2011), and that the report's conclusions were logical. In summary, the draft Stage 1 report was satisfactory for the purposes of the draft Stage 1 archaeological assessment of this study area. The Huron-Wendat Nation requested to be consulted at every stage, especially regarding the

Parsons site, and to continue with the Huron-Wendat field monitor program for field work. Huron-Wendat stressed that avoidance and/or mitigation measures must apply for any potential disturbance to their heritage. In response, Imperial reiterated its recognition that the Parsons site is an important Huron-Wendat archaeological site. Imperial fully understands that Huron-Wendat will continue to participate in field work and monitoring and consulted at every stage, including on avoidance and mitigation strategies related to the site.

20. The Stage 1 Archaeological Assessment report will be submitted to MTCS and Imperial remains open to accepting comments and feedback from MTCS on the report at any time during the review process.
21. Based on the results of the Stage 1 report, the Stage 2 archaeology assessment of the Project started in August 2018. This assessment is ongoing and includes both the assessment of the project corridor and an assessment of geotechnical borehole locations to support the evaluation of trenchless construction methods (i.e., HDD and HDB). The areas retaining archaeological potential consist of a combination of agricultural, residential, industrial and park land. The recommended method of testing for archaeological potential is through hand excavation of shovel test pits at 5 m intervals and pedestrian survey of ploughed and weathered fields at 5 m intervals, in accordance to the requirements set out in the *Standards and Guidelines for Consultant Archaeologists* (MTCS 2011).
22. MCFN, Six Nations, HCCC/HDI and Huron-Wendat continue to participate as field liaison representatives/ field monitors for the Stage 2 archaeological assessment field survey work.
23. Following completion of the Stage 2 archaeological assessment, the Stage 2 Archaeology Assessment report will be provided to Indigenous communities for their review and comment and the final version will be submitted to MTCS.

5. CORRESPONDENCE WITH MTCS

A summary of key correspondence with MTCS is provided in Table 5-1. Exhibit H Record of Consultation includes a record of the consultation log with MTCS.

Table 5-1: Correspondence with MTCS

Date	Attendees	Description	Comment
5/22/2018	MTCS	Imperial Project notification to MTCS.	N/A
6/1/2018	MTCS	MTCS advised that the Project should carry out an archaeological assessment by an archaeologist licensed under the *Ontario Heritage Act.*	Imperial responded that a Stage 1 Archaeological Assessment study in accordance with MTCS *Standards and Guidelines for Consultant Archaeologists* (2011) was being completed by Past Recovery, Imperial's licensed archaeological consulting firm under the *Ontario Heritage Act*.
6/28/2018	MTCS, ERM, Imperial, Past Recovery	Meeting held with MTCS to provide a project overview, introduce Past Recovery licensed archaeologists, and confirm archaeological assessment and cultural heritage study methodology and requirements.	Imperial explained and confirmed with MTCS archaeological assessment methodology for Stage 1 and Stage 2 and for the geotechnical investigation program. Imperial noted interest to date from MCFN, Six Nations and Huron-Wendat to participate in archaeological assessment and field monitoring program. MTCS noted potential interest by HCCC/HDI and Imperial agreed to engage and consult HCCC/HDI. Imperial noted that a draft Stage 1 report will be shared with First Nations for their review and will be open to accepting comments and feedback on the report at any time during the review process. Imperial provided MTCS with an overview of Imperial's LTC pre-application and provided information on Community Information Sessions to be held in various local municipalities in the study area.
7/17/2018	MTCS	Email sent to MTCS sharing the geotechnical investigation borehole locations and access plans for review.	On Aug 1, 2018, MTCS acknowledged receipt of document and confirmed no comment at this time.
8/3/2018	MTCS	Email sent to MTCS from Unterman McPhail Associates (UMcA) to provide details of the cultural heritage study methods.	UMcA is Imperial's licensed specialist conducting the cultural heritage assessment for the Project. On Aug 7, 2018, MTCS responded indicating that the proposed approach was satisfactory and consistent with other linear facility projects.