



Stantec

BOW LAKE WIND FARM
DECOMMISSIONING PLAN REPORT

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Prepared for:

**Nodin Kitagan Limited Partnership and
Nodin Kitagan 2 Limited Partnership**
by its General Partners Shongwish Nodin
Kitagan GP Corp. and Shongwish Nodin
Kitagan 2 GP Corp
200, 4723 -1 Street SW
Calgary AB T2G 4Y8

Prepared by:

Stantec Consulting Ltd.
Suite 1 – 70 Southgate Drive
Guelph, ON N1G 4P5

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1.0 Introduction

1.1 PROJECT OVERVIEW

Nodin Kitagan Limited Partnership and Nodin Kitagan 2 Limited Partnership, by their General Partners Shongwish Nodin Kitagan GP Corp. and Shongwish Nodin Kitagan 2 GP Corp., respectively (the “Proponent”), are proposing to develop Phase 1 and Phase 2 of the Bow Lake Wind Farm predominantly on Provincial Crown Land within the unorganized Townships of Smilsky and Peever, in the District of Algoma, Ontario (the “Project”). The Project is located approximately 80 km north of Sault Ste. Marie and roughly six kilometres east of Montreal River Harbour. The Project has three Feed-in Tariff (“FiT”) Contracts with the Ontario Power Authority (“OPA”) for the sale of electricity generated by the Project.

As part of the Project’s design, construction, and operational activities, and understanding the Project falls within the territory of the Batchewana First Nation of Ojibways (“BFN”), the Proponent has engaged directly with the BFN. As a result of these efforts, the BFN:

- Has entered the Project as partner;
- Has entered into various business and relationship agreements with the Proponent to guide Project activities; and
- Has issued a Development and Power Generation Permit, which provides the BFN’s approval to construct, operate, repower, and decommission the Project.

The English name of the Project is the *Bow Lake Wind Farm*, however, the BFN know and refer to the Project as *Chinodin Chigumi Nodin Kitagan*.

As proposed, the Project will include 36 wind turbines for a total maximum installed nameplate capacity of up to 58.32 MW. In addition, the Project will require 34.5 kV above and below ground electrical collector and communication lines, pad-mounted transformers, crane pads, two permanent meteorological towers, access roads, operations and maintenance building, welfare buildings, a transformer station (TS), construction compounds and laydown yards, and other ancillary facilities. The Project will connect to the provincial power grid via existing 115 kV transmission lines located adjacent to the Project’s transformer station location. The Project site plan is provided in the **Project Description Report**.

1.2 REPORT REQUIREMENTS

The purpose of the Decommissioning Plan Report is to provide the public, Aboriginal communities, and regulatory agencies with an understanding of the decommissioning plan for the Project at the end of its useful life, and to describe how the Proponent proposes to restore the Project Location for its intended use following Project closure.

This Report is one component of the REA Application for the Project, and has been prepared in accordance with Item 3, Table 1 of O. Reg. 359/09, the Ministry of the Environment's ("MOE") *Technical Guide to Renewable Energy Approvals*. According to subsection 6.(3) of O. Reg. 359/09 and the Ministry of Natural Resources ("MNR") *Approval and Permitting Requirements Document* (Sept 2009) ("APRD"). The Project is classified as a Class 4 Wind Facility and has followed and will follow the requirements identified in O. Reg. 359/09 for such a facility.

O. Reg. 359/09 sets out specific content requirements for the Decommissioning Plan Report as provided in **Table 1.1**.

Table 1.1: Decommissioning Plan Report Requirements: O. Reg. 359/09

Requirements	Completed	Section Reference
Set out a description of plans for the decommissioning of the renewable energy generation facility, including the following:		
1. Procedures for dismantling or demolishing the facility.	✓	3.3
2. Activities related to the restoration of any land and water negatively affected by the facility.	✓	3.4
3. Procedures for managing excess materials and waste.	✓	3.5

1.3 DECOMMISSIONING PHILOSOPHY

The design life of the Project is estimated to be 30+ years; however, it is not uncommon for well-maintained projects to have a longer useful life than the design life. To extend the life of the Project it is possible that it will be repowered prior to considering any decommissioning activities. Repowering may involve, for example, switching/updating gearboxes and generators with new equipment, replacing blades, and upgrading electrical equipment.

Following any repowering activities, at the end of the useful life of the Project, decommissioning activities would be implemented. The decommissioning and restoration process comprises removal of above-ground structures; removal of below-ground structures to a depth of approximately one metre; and re-vegetation and seeding.

Given the public will have utilized the Project roads for 30+ years at the time of decommissioning, and may continue to use the roads, the roads, associated culverts and drainage structures, and residual minor improvements will not be removed unless the BFN, a forestry management company with rights in the area (e.g., Clergue Forestry Management), or the Crown specifically requests that they be removed.

Above-ground structures include the wind turbines (including blades, nacelles, and towers), pad-mounted transformers, crane pads, overhead collection lines, TS, O&M building, welfare buildings, meteorological towers, and access gates. Below-ground structures include wind turbine pedestals and foundations, foundations of the O&M building and TS, underground collection lines, and drainage structures.

The process of removing structures involves evaluating and categorizing all components and materials into categories of recondition and reuse, salvage, recycling, and disposal. In the interest of increased efficiency and minimal transportation impacts, components and material may be stored on-site in a pre-approved location until the bulk of similar components or materials are ready for transport. The components and material will be transported to the appropriate facilities for reconditioning, salvage, recycling, and/or disposal.

2.0 Decommissioning During Construction

At the time the Project enters the construction phase, the Proponent will have full financing in place. Accordingly, it is very unlikely that the Proponent would not be able to complete the construction of the Project once construction has commenced. Nevertheless, in the unlikely event that the Proponent cannot successfully complete the construction of the Project, the rights to the Project (and any associated liabilities and obligations) may be sold so that the Project would be successfully constructed by the purchasing developer.

Prior to purchasing of the Project by another developer, the Proponent would be responsible for interim environmental protection. In the event that the site has been cleared and/or excavated in preparation for installation of Project infrastructure, appropriate environmental protection measures will have been implemented to protect the surrounding environment. The extent of environmental protection measures required would be dependent on the progress made at the time of Project abandonment, and would be determined through site inspections by qualified specialists. Possible protection measures would include, as appropriate, erosion and sediment control fencing, filling excavated areas and reseeding and/or re-vegetation. Further details about environmental protection measures to be implemented during construction are described in the **Construction Plan Report**.

In the event that the Project is not purchased by another developer, the Proponent will be responsible for decommissioning of the Project. In such a case, the decommissioning process to be followed and the mitigation measures to be implemented will be the same as those detailed in Section 3.0 for decommissioning after ceasing operation of the Project. However, it is noted that depending upon the point of abandonment in the construction cycle, not all decommissioning activities set out in Section 3.0 will apply (e.g., if turbines have yet to be installed, then removal of turbines would not apply).

3.0 Decommissioning after Ceasing Operation

At the end of the Project’s useful life, which may be extended by repowering initiatives, decommissioning would entail removing certain facility components and restoring the land to a safe and clean condition. The costs for removal of Project infrastructure will be the responsibility of the owner of the Project.

All decommissioning and restoration activities will be performed according to the requirements of relevant government agencies, and will be in accordance with all relevant statutes in place at the time of decommissioning. In addition, the Proponent has made the commitment to engage the BFN prior to undertaking any decommissioning activities due to their close ties to the local land and involvement in the Project.

Table 3.1 below lists the key activities that will be associated with the decommissioning of the Project, along with the anticipated timeline for each activity. The ultimate timeline for each activity will be determined by various factors such as weather, equipment and contractor availability.

Table 3.1: Decommissioning Activities

Sequence	Activity	Duration
1	Site Preparation (as required)	1 month
2	Removal of WTGs & Transformers	6 months
3	Removal of WTG Pedestals (to 1 m below grade)	9 months
4	Removal of TS and grounding grid	4 months
5	Removal of above ground Electrical Lines	3 months
6	Removal of Permanent Meteorological Tower	1 month
7	Removal of O&M Building	5 months
8	Site Rehabilitation	6 months

3.1 GENERAL ENVIRONMENTAL PROTECTION DURING DECOMMISSIONING

During all decommissioning and restoration activities, standard environmental protection and mitigation measures will be implemented. Many activities during decommissioning would be comparable to the construction phase. As such, standard mitigation measures and standard management practices as appropriate, including erosion and sediment control (e.g., silt fencing), dust suppression, and contingency plans for unexpected finds and spills are provided in the **Construction Plan Report**. Water takings related to dust suppression along access roads and work areas is only anticipated to be required during very dry periods and is estimated to be less than 50,000 L/day.

As appropriate, safety signage will be installed along roads leading into the site to advise members of the public of the associated dangers of the decommissioning activities, which are similar to those experienced at any typical construction site. In addition, for safety reasons members of the public will be temporarily prohibited from entering areas where decommissioning work is underway. In order to allow continued access for members of the public to Crown lands, alternate access routes may be described in the signage where possible.

Following the removal or in-situ management of Project components, all work areas will be cleared of all debris (see Section 3.5 for more information related to waste management) and rehabilitated (see Section 3.4).

3.2 PRE-DISMANTLING ACTIVITIES

At the end of the Project's useful life, it will first be de-energized and isolated from all external electrical lines.

Prior to any dismantling or removal of equipment, staging areas would be delineated at each turbine site. All decommissioning activities would be conducted within designated areas, including ensuring that vehicles and personnel stay within the demarcated areas.

Site clearing is not anticipated to a large degree for the staging areas as these areas along with road corridors will have been kept clear throughout operation of the Project for maintenance purposes. However, if clearing is required for any decommissioning activities, this will be carried out as per the requirements of the MNR, as applicable. If required, access roads may be reinforced, compacted, or temporarily widened to accommodate the machinery required for Project infrastructure removal.

Crane pads at the base of the turbines will remain in place throughout operation of the Project and will be used for decommissioning. If new decommissioning processes become standard practice, the crane pads may be graded and reconstructed appropriately. Following decommissioning, the crane pads will be reclaimed.

Topsoil will be removed prior to equipment dismantling and will be stockpiled separately from excavated subsoil materials. Following backfilling, the topsoil will be replaced to original depth and original drainage patterns will be re-established where reasonably possible.

3.3 EQUIPMENT DISMANTLING AND REMOVAL

3.3.1 Access Roads

Following removal of Project infrastructure, the access roads will remain in place for continued public use unless the Proponent is reasonably advised otherwise by the Crown, BFN, and/or any forestry management company with rights to the area. In the case where roads or segments of roads are requested to be removed, the gravel will be extracted, the area de-compacted as necessary, and reseeding with native species undertaken.

3.3.2 Turbines and Pad-Mounted Transformers

The wind turbines would be dismantled into their original component parts in the reverse sequence of steps that occurred during turbine assembly (detailed in the **Construction Plan Report**), namely:

- Disconnection and removal of control and power wiring and electronics in tower base;
- Dismantling of the rotor: removal and disassembly of the hub and blade assembly;
- Removal and disassembly of the nacelle; and
- Decoupling and disassembly of the tower sections.

The turbine components would be temporarily stored at the assembly areas until removed from the site by truck. Once the components are disassembled, the materials will be broken down into manageable sizes for transport to re-use sites and/or suitable reconditioning or salvage facilities. All non-re-useable, reconditioned, and salvageable components will be processed and safely transported to an approved recycling and/or disposal facilities.

The pad-mounted transformers will be removed for reuse, reconditioning, salvage, or disposal as determined based upon their condition and market value. All oils and fluids from Project equipment will be drained prior to dismantling and will be disposed of in accordance with applicable waste disposal regulations.

3.3.3 Turbine Pedestals

Topsoil and/or fill will be temporarily removed from the areas surrounding the pedestals and will be stored for replacement. The pedestals will be removed to a depth of approximately 1 m below grade, which is essentially sufficient to remove all anchors, conduits, and cables. Removing the pedestals to the depth of 1 m will minimize the potential effects associated with complete removal of the foundation which would exceed the potential effects (e.g., erosion, sedimentation, noise, and ground and vegetation disturbance) of leaving the buried foundation in place.

In addition, removal of the pedestal to a depth of 1 m below grade, which is the current standard management approach, will permit the intended future use of the site for forestry, timber management, and recreational purposes as the buried foundation will not interfere with these activities. Further, the concrete remaining in the subsurface is inert and would not pose a risk to groundwater movement or quality.

After the removal of these materials, the excavated areas will be backfilled with clean sub-grade material and resurfaced with the temporarily stockpiled topsoil. As practicable, the work areas compacted by decommissioning activities will be de-compacted in a manner to adequately restore the area for re-vegetation.

3.3.4 Electrical Collector Lines

Overhead Collector Lines

The conductors will be removed from the poles and temporarily stored in a central location prior to removal from the site. Poles will then be removed, temporarily stored in a central location, and holes filled with comparable sub-grade material. In areas where potential environmental effects related to complete removal outweigh the benefits, the poles may be sawed flush with the surrounding grade.

Stored conductors and poles will be later removed and transported to appropriate facilities for salvage or disposal. Subsequent to the removal of the components, the work area will be cleared of all debris.

Any removal of lines that cross watercourses will be carried out according to accepted practices such as Department of Fisheries and Oceans Canada ("DFO") Operational Statements. Switches and other hardware will be removed and delivered to a processing company for recycling as practicable.

Underground Collector Lines

Underground collector lines will be de-energized and remain in place, with both ends that come to the surface removed to approximately 1 m below grade. This approach will permit the intended future use of the site for logging, timber management, and recreational purposes as the buried collector lines will not interfere with these activities and will not have a harmful effect on the environment if left buried in place.

3.3.5 Transformer Station

The TS including transformers, switchgear, structures, grounding grid and electrical equipment will be removed from the site. Fluids contained within the equipment will be drained and disposed of in accordance with applicable waste disposal regulations. Steel, conductors, switches, and transformers will be reconditioned and reused, sold as scrap, recycled, or disposed of appropriately depending upon market value.

The TS foundations will be removed to a depth of 1 m below grade. This approach will permit the intended future use of the site for forestry, timber management, and recreational purposes as the buried foundations will not interfere with these activities and will not have a harmful effect on the environment if left in place.

As practicable, unexcavated areas compacted by equipment used in decommissioning will be de-compacted in a manner to adequately restore the topsoil and sub-grade material to the density consistent and compatible with the surrounding area and prepared for re-vegetation.

3.3.6 Operation and Maintenance Building and Welfare Buildings

The O&M building and welfare buildings will be disassembled and removed from the site. Building materials will be recycled (e.g., wood framing and steel beams), reconditioned (e.g., switches and other equipment), sold as scrap, and all non-salvageable or non-recyclable components will be processed and safely transported to an MOE, MNR, or like approved disposal facility. The foundation for the building will be removed to a depth of 1 m below grade and covered with soil/fill in preparation for site rehabilitation.

The water well and septic system associated with the O&M building will be decommissioned in accordance with applicable abandonment guidelines.

As practicable, unexcavated areas compacted by equipment used in decommissioning will be de-compacted in a manner to adequately restore the topsoil and sub-grade material to the density consistent and compatible with the surrounding area and prepared for re-vegetation.

3.3.7 Permanent Meteorological Towers

The meteorological towers, including associated guy wires, will be disassembled and removed from the site for reuse, recycling, sold as scrap, or sent to an approved disposal facility. The foundation and anchor guys will be removed to a depth of 1 m below grade.

3.4 SITE REHABILITATION/RESTORATION

The Project Location and surrounding area is forested and is actively harvested by Clergue Forest Management Inc. ("Clergue"). All of the wind turbines will be situated in second-growth forest that is periodically disturbed by forest management activities, including existing and proposed approved forestry roads providing access to the Project Location. As per Clergue's Forest Management Plan, areas throughout the Project are slated for harvest so the condition of the site area may be considerably different at the time of decommissioning than its current state. Additional information related to the existing condition of the site is provided in the **Natural Heritage Assessment**.

At the time of decommissioning, the site rehabilitation/restoration activities outlined below will be updated as necessary based upon the standards and practices at the time of decommissioning,

and in consultation with the BFN, MNR, and any other appropriate regulatory and government bodies.

3.4.1 Re-vegetation

Tree and vegetation removal may be required during decommissioning. If replanting/reseeding of trees/vegetation is undertaken, native species will be used. Erosion and sedimentation measures required on-site will remain until seed is fully established. It is envisioned that the same mitigation and monitoring measures implemented during construction would be used for the decommissioning of the Project. These are described in detail in the **Construction Plan Report**.

Areas requiring excavation will be filled with clean sub-grade material comparable to the surrounding area and will be compacted to a similar density. Topsoil will then be placed on top of the sub-grade material and graded appropriately to maintain site drainage patterns.

3.4.2 Watercourse Crossings

Any proposed decommissioning works within or near watercourses would be discussed with the MNR and/or DFO, as necessary, to determine any applicable guidelines, permitting, site-specific mitigation, and/or remediation plans. It is envisioned that the same mitigation and monitoring measures implemented during construction would be used for the decommissioning of the Project. These are described in detail in the **Construction Plan Report**. In particular, erosion and sediment control measures would be used, and all refuelling would be conducted away (i.e., ≥ 50 m) from watercourses.

3.4.3 Potential Contamination

During the construction and operation of the Project, environmental management practices would be in effect, such as secure containment of potentially hazardous materials, to minimize the potential for spills. As there is limited handling or storage of bulk fuels or chemicals during the lifetime of the Project, the potential for site contamination is very low. The Project should not, therefore, result in any long term decommissioning issues that would be detrimental to future site uses.

Although spill prevention procedures will be in place during operation, there is the potential through the routine operation, maintenance, and decommissioning process for small spills to occur. Where feasible and under most circumstances if a spill occurs, the impacted soils will be cleaned up at the time of the initial release. As an additional measure to identify any residual soil contamination that may be present, soil samples will be taken within the transformer station location to confirm that the soils meet the appropriate quality requirements for their intended future use.

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Should soil contamination occur at any location within the Project Location, the extent of the impacted soils will be delineated, and where feasible excavated, and removed to the standards of the day. The contaminated material will be disposed at an appropriate approved facility, and will be replaced with appropriately compatible material. If excavation of impacted soils in the vicinity of natural features or obstructions is not feasible, or is not a MNR preferred approach, a contaminant management plan will be prepared in consultation with MNR based on best practices of the day.

Provided the Project is operated and maintained in-line with standard industry practices, there should be no significant environmental liabilities associated with cleanup or restoration.

3.5 MANAGING EXCESS MATERIALS & WASTE

Prior to embarking on the dismantling and demolition of the Project, the Proponent would evaluate and categorize all components and materials into categories of recondition, re-use, salvage, recycling, and disposal. Components and material may be stored on-site in a pre-approved location(s) (e.g., similar to the laydown areas during construction) until the bulk of similar components or materials are ready for transport from the site. This will result in transportation efficiencies and fewer impacts associated with transportation.

All wastes would be managed in accordance with *Ontario Regulation 347, General – Waste Management (O. Reg. 347)* and with reference to *Ontario Provincial Standard Specification 180 - General Specification For The Management of Excess Materials (OPSS 180)*, or relevant regulations and specifications in effect at that time.

Typical waste materials and modes of disposal, recycling, or reuse are presented in the following **Table 3.2**.

Component	Mode of Disposal
Turbine blades	Disassembled. Fiber glass to land fill (or recycled where possible), copper cabling and aluminum spar (if present) recycled.
Turbine towers	Recycle, re-use
Met tower	Recycle, re-use
Generators and gearboxes	Salvage for reuse, recondition, or recycle
Concrete from pedestals and foundations	Crush and recycle as granular material, recycle rebar
Cabling	Recycle
Transformers and switchgear	Salvage for reuse, reconditioning, or recycle
Granular materials	Reuse or dispose in landfill
Oils/lubricants	Recycle or disposal
Hazardous materials	Dispose through licensed hauler and disposal / treatment facility
Miscellaneous non-recyclable materials	Dispose in a licensed landfill

As much of the facility will consist of reusable, reconditionable, scrap, or recyclable materials, there would be minimal residual waste for disposal as a result of decommissioning the facility. Small amounts of waste materials would be managed in accordance with O. Reg. 347 or subsequent applicable legislation. Residual non-hazardous wastes would be disposed at a licensed landfill in operation at the time of decommissioning (e.g., potentially the Montreal River Waste Disposal Site).

3.6 MONITORING

Follow-up monitoring would be conducted for one year after site restoration, to allow for the Project area to experience seasonal changes and help determine if additional restoration is required, as determined by a qualified environmental advisor specializing in re-vegetation works. As appropriate, a monitoring plan would be prepared prior to decommissioning.

Additional monitoring activities may also be conducted, depending upon the site conditions at the time of decommissioning. If negative impacts are noted during monitoring activities, appropriate remediation measures would be designed and implemented as necessary, and additional follow-up monitoring would be conducted, as determined by an environmental inspector.

4.0 Emergency Response and Communications Planning

4.1 EMERGENCY RESPONSE AND COMMUNICATIONS PLAN

The Project's Emergency Response, Environmental, and Communications Plan (as discussed in the **Design and Operations Report**) would be in effect for all phases of the Project including decommissioning. In addition, the programs, plans, and procedures (e.g., personnel training, public safety plan, and complaint response protocol) described within the **Design and Operations Report**, as may be updated from time to time, will be carried forward during the decommissioning of the Project as appropriate.

4.2 DECOMMISSIONING NOTIFICATION

Prior to decommissioning, the Proponent will consult with the BFN, the Crown, and forestry management company regarding the details of decommissioning and as reasonable would amend this **Decommissioning Plan Report** to meet regulatory requirements in effect at that time.

Notification of decommissioning will follow the Emergency Response, Environmental, and Communications Plan as well as be provided to Project stakeholders (including public, municipal, and Aboriginal communities) prior to undertaking decommissioning activities. Notification may be in the form of letters, newspaper notices, or direct communications for example.

5.0 Other Approvals

As applicable, barring an emergency event (e.g., extreme weather, timing restrictions, and site restrictions), applicable approvals for decommissioning of the Project will be sought prior to the commencement of decommissioning activities. Additionally, following the completion of the decommissioning activities, a Record of Site Condition may be required under the Ministry of the Environment's Records of Site Condition Regulation (O. Reg. 153/04) made under the *Environmental Protection Act*.

Given the Project is on Crown land, the MNR (or their successor agency) will be consulted regarding the final decommissioning plan, including the decommissioning of Project components over, under, or around water bodies, replanting, and re-vegetation. Any tree clearing and re-vegetation activities will be performed in accordance with the requirements of the MNR as applicable. As applicable, DFO's (or their successor agency's) operational statements will be applied and DFO may be consulted regarding the decommissioning of water crossings prior to undertaking them.

Finally, it is acknowledged that the Province may: i) require financial assurance of the decommissioning activities proposed within this report; and ii) include conditions of approval to ensure that such activities proposed are implemented.

6.0 Conclusion and Signatures

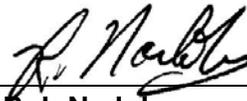
This Decommissioning Plan Report for the Project has been prepared by Stantec for the Proponent in accordance with O. Reg. 359/09, the MOE's REA Technical Guide, and the MNR's APRD.

This Report has been prepared by Stantec for the sole benefit of the Proponent, and it may not be used by any third party without the express written consent of the Proponent. The data presented in this Report are in accordance with Stantec's understanding of the Project as it was presented at the time of reporting.

STANTEC CONSULTING LTD.



Mark Kozak
Project Manager



Rob Nadolny
Project Director