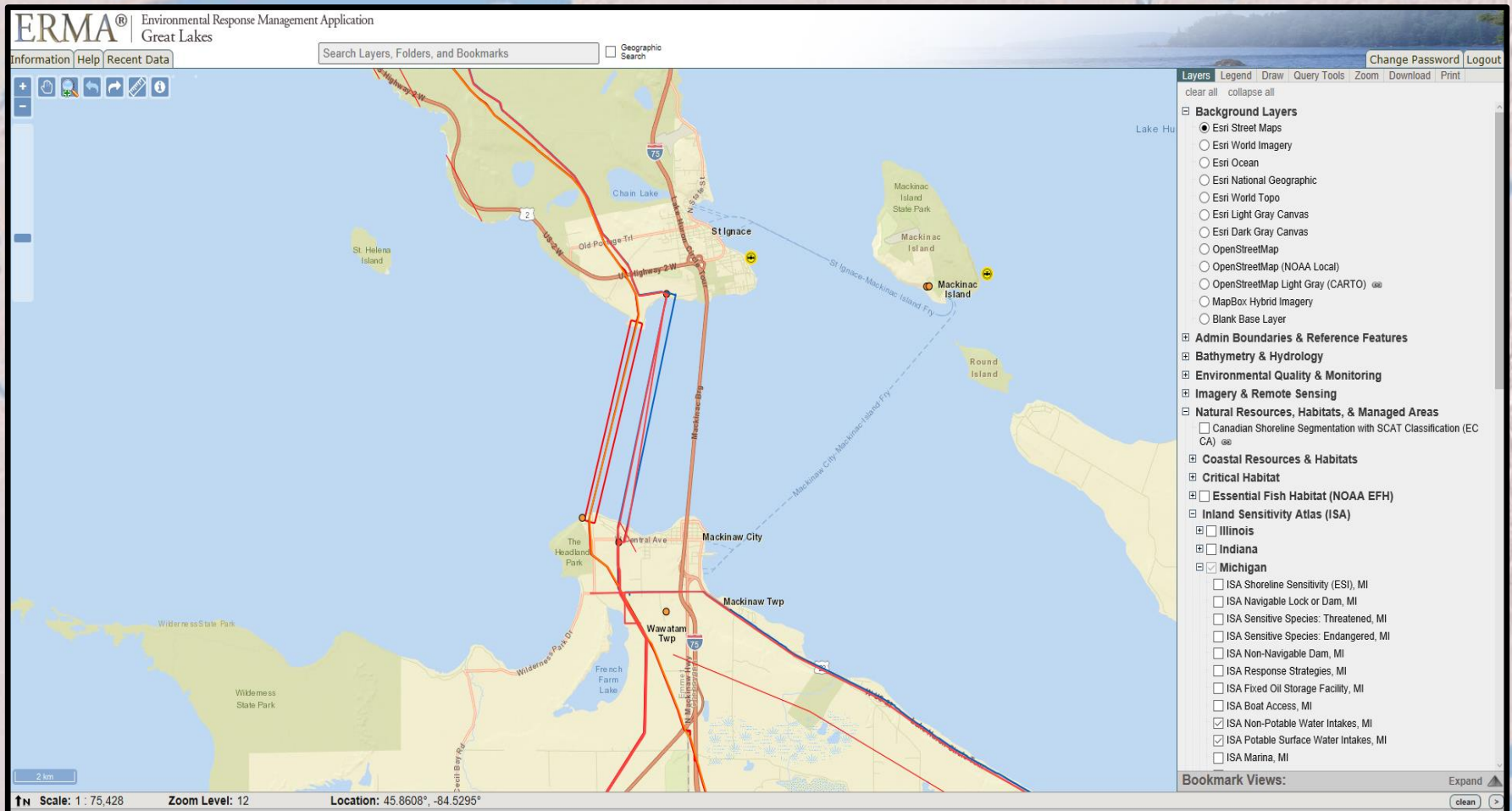


Point LaBarbe/McGulpin Point Response

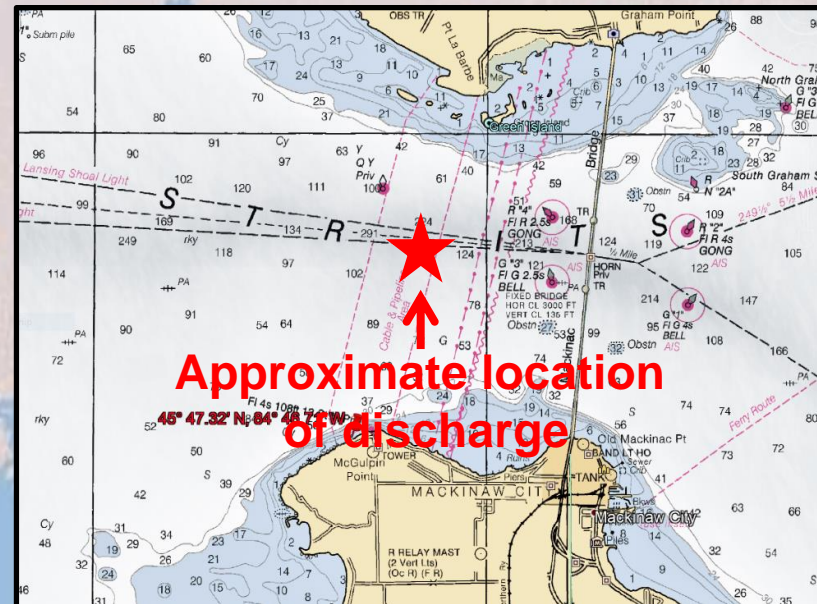
April 2 – May 8, 2018

Regional Response Team 3 Meeting – November, 2018



Summary of incident

- On April 2, 2018, a release of approx. 600 gallons of dielectric fluid was reported in Straits of Mackinac
- Dielectric fluid is a liquid (typically mineral oil) used as electrical insulator in high-voltage cables to suppress arcing & serve as coolant
- Source determined to be American Transmission Company (ATC) utility cables, approx. 11,000-12,000 feet offshore at depth of approx. 270'
- Spill response initiated April 2 in accordance with Northern Michigan Area Contingency Plan, USCG Sector Sault Ste. Marie serving as Federal On Scene Coordinator (FOSC)



Summary of incident

- Unified command established April 3: USCG, Michigan Department of Environmental Quality (MI DEQ), ATC, tribal representatives.
- Partners engaged: TransCanada, Enbridge, Consumers Energy, Pipeline & Hazardous Materials Safety Administration (PHMSA), NOAA Scientific Support Coordinator, US Fish & Wildlife, USDA, US EPA, et. al.
- Contracted oil spill removal organizations (OSRO) arrived & commenced response. Removal of residual fluid from lines took several weeks due to length of cables vs. diameter, arrival of specialized equipment
- Residual product removal from ATC cables completed April 29. Cables capped.

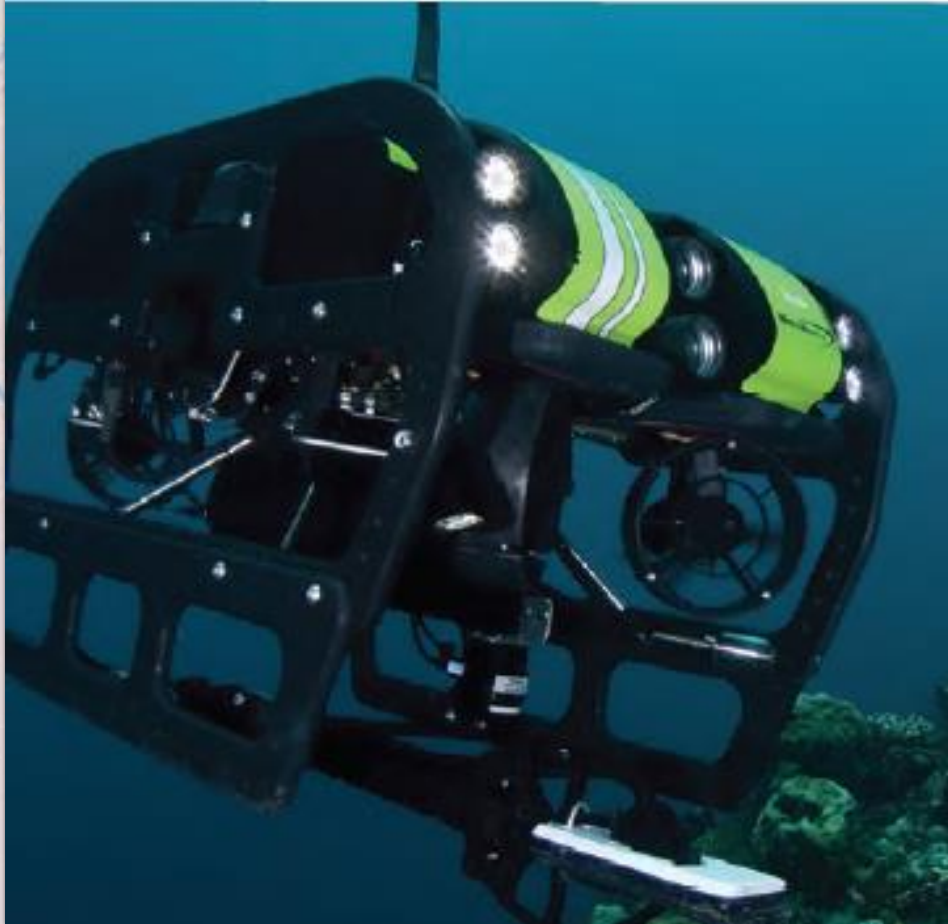


Summary of incident

- Multiple underwater assessments conducted via remotely operated vehicles (ROV)
- Enbridge reported three dents to pipeline, no product release reported
- TransCanada assessed their pipeline and found no damage
- Consumers Energy reported damage to permanently deactivated (“retired in place”) cables. No free-flowing fluid contained in lines
- Consumers Energy cables successfully capped & stabilized
- Spill response for LaBarbe/McGulpin concluded May 8



Underwater Assessment: Enbridge and TransCanada



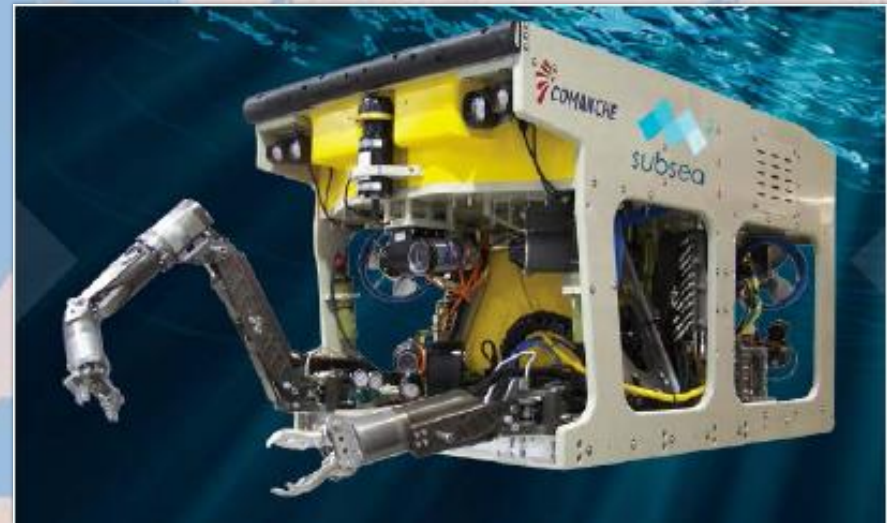
- Enbridge and TransCanada entered into agreement to utilize an ROV for visual assessment of their respective utility infrastructure.
- They are working in close coordination with Pipeline and Hazardous Material Safety Administration (PHMSA) during the assessment phase.
- PHMSA will review any future plans to conduct remedial work identified by the damage assessment.
- Enbridge timeline will be similar to ATC timeline for ROV deployment.

Underwater Assessment: Enbridge and TransCanada

ATC contracted T&T Marine Salvage to conduct underwater assessment of their utility cables. Initial actions are to deploy a side scanning sonar device for preliminary underwater assessment



A second assessment will be done by T&T Marine Salvage. They will deploy an ROV to assess and mitigate damaged cables.



Summary of incident

- Daily patrols did not report any seen or abnormal avian behavior to date.
- Conducted aerial and surface surveillance for seen detection and wildlife reconnaissance.
- 2 CG helos, 4 CG Auxiliary flights and 8 contracted flights expended hours of aerial surveillance.
- 10 hours of vessel surface patrol have were conducted.
- USDA Animal and Plant Health Inspection Service (APHIS) conducted shore side and waterside assessment of waterfowl populations and behaviors



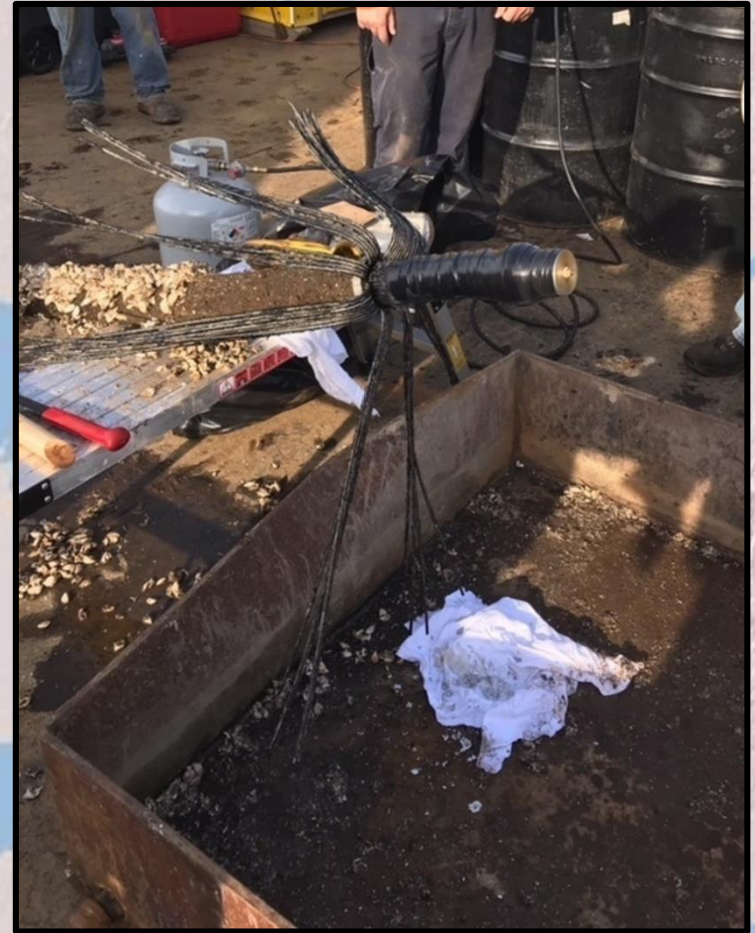
Summary of incident

- Cooperative effort resulted in response personnel completing removal of all residual product and capping of cables. Concrete mats were placed to stabilize remaining cables
- Final/actual spill quantity released was assessed as Coastal-Minor (less than 1,000 gallons)
- Assessments conducted on wildlife, habitat & environmental impacts from spill, deemed minimal



Investigation of cause

- Commercial vessel activity reported as possible cause of damage. USCG & NTSB investigations commenced
- NOAA Chart 14881: *“CAUTION – SUBMARINE PIPELINES AND CABLES. Additional uncharted submarine pipelines and submarine cables may exist within the area of this chart. Not all submarine pipelines and submarine cables are required to be buried and those that were originally buried may have become exposed. Mariners should use extreme caution when operating vessels in depths of water comparable to their draft in areas where pipelines and cables may exist and when anchoring, dragging or trawling.”*



Way Ahead

- USCG and National Transportation Safety Board (NTSB) continue investigations into vessel activity that may have caused damaged to cables.
- USCG D9 no-anchor zone rule currently in process
- State of Michigan issued temporary no-anchor rule pending completion of USCG rule