



APPENDIX 11

FERC Upland Erosion Control, Revegetation and Maintenance Plan (2003)

Purpose

This document reviews the Company's compliance Federal Energy Regulatory Commission (FERC) Guidelines On Construction In Upland And Wetland Areas (2003).

Who is this for?

This document supports Environmental Specialists to determine compliance, maintain internal standards and specifications, and advise Managers on relevant requirements.

Relevant Standard Requirements ¹	Project Specification
I. APPLICABILITY	
A. The project sponsors should specify in their applications for a FERC Certificate (Certificate) any individual measures in this Plan they consider unnecessary, technically infeasible, or unsuitable due to local conditions and to fully describe any alternative measures they would use. Applicants should also explain how those alternative measures would achieve a comparable level of mitigation. Once a project is certificated, further changes can be approved. Any such changes from the measures in this Plan (or the applicant's approved plan) will be approved by the Director of the Office of Energy Projects (Director), upon the applicant's written request, if the Director agrees that an alternative measure:	Not applicable Not a U.S. project, so FERC notification issues do not apply. That being said, RF regulatory agencies have similar change management/approval procedures.
1. Provides equal or better environmental protection;	
2. Is necessary because a portion of this Plan is infeasible or unworkable based on project-specific conditions; or	
3. Is specifically required in writing by another Federal, state, or Native American land management agency for the portion of the project on its land or under its jurisdiction. Any requirements in this Plan to file material with the Secretary of the FERC (Secretary) do not apply to projects undertaken under the provisions of the blanket certificate program. This exemption does not apply to a request for alternative measures. Project-related impacts on wetland and waterbody systems are addressed in the staff's Wetland and Waterbody Construction and Mitigation Procedures (Procedures).	
II. SUPERVISION AND INSPECTION	
A. ENVIRONMENTAL INSPECTION	
1. At least one Environmental Inspector is required for each construction spread during construction and restoration (as defined by section V). The number and experience of Environmental Inspectors assigned to each construction spread should be appropriate for the length of the construction spread and the number/significance of resources affected.	Comply
2. Environmental Inspectors shall have peer status with all other activity inspectors.	Comply

¹ Federal Energy Regulatory Commission (FERC) Guidelines On Construction In Upland And Wetland Areas (2003)



Relevant Standard Requirements ¹	Project Specification
3. Environmental Inspectors shall have the authority to stop activities that violate the environmental conditions of the Certificate, state and Federal environmental permit conditions, or landowner requirements; and to order appropriate corrective action.	Comply All site staff have the authority to stop work because of HSE violations.
B. RESPONSIBILITIES OF ENVIRONMENTAL INSPECTORS	
At a minimum, the Environmental Inspector(s) shall be responsible for:	
1. Ensuring compliance with the requirements of this Plan, the Procedures, the environmental conditions of the Certificate authorization, the mitigation measures proposed by the applicant (as approved and/or modified by the Certificate), other environmental permits and approvals, and environmental requirements in landowner easement agreements.	Comply With regard to Environmental monitoring duties, Starstroi plans, procedures and/or Method Statements typically included language similar to the following quote: Verify that the requirements of the Environmental Procedures and method statements, and commitments from environmental review of the pipeline (project) are fully carried out. Monitor activities for potential environmental concerns, identify solutions and report activities as required in the HSE Plan and HSE Inspection Procedure. In addition, Sakhalin Energy Company Site Representative (CSR) oversaw Sakhalin Energy Environmental Inspectors.
2. Identifying, documenting, and overseeing corrective actions, as necessary to bring an activity back into compliance.	Comply See above B1 comment
3. Verifying that the limits of authorized construction work areas and locations of access roads are properly marked before clearing.	Comply See above B1 comment
4. Verifying the location of signs and highly visible flagging marking the boundaries of sensitive resource areas, waterbodies, wetlands, or areas with special requirements along the construction work area.	Comply See above B1 comment
5. Identifying erosion/sediment control and soil stabilization needs in all areas.	Comply See above B1 comment
6. Ensuring that the location of dewatering structures and slope breakers will not direct water into known cultural resources sites or locations of sensitive species.	Do not comply. See above B1 comment
7. Verifying that trench-dewatering activities do not result in the deposition of sand, silt, and/or sediment near the point of discharge into a wetland or waterbody. If such deposition is occurring, the dewatering activity shall be stopped and the design of the discharge shall be changed to prevent reoccurrence.	Comply See above B1 comment
8. Ensuring that subsoil and topsoil are tested in agricultural and residential areas to measure compaction and determine the need for corrective action.	Do not comply See above B1 comment
9. Advising the Chief Construction Inspector when conditions (such as wet weather) make it advisable to restrict construction activities to avoid excessive rutting.	Comply CSR advised instead of Chief Construction Inspector.
10. Ensuring restoration of contours and topsoil.	Comply See above B1 comment
11. Verifying that the soils imported for agricultural or residential use have been certified as free of noxious weeds and soil pests, unless otherwise approved by the landowner.	Comply Do not plan topsoil importation but if necessary verify weed/soil pests issue.



Relevant Standard Requirements ¹	Project Specification
12. Determining the need for and ensuring that erosion controls are properly installed, as necessary to prevent sediment flow into wetlands, waterbodies, sensitive areas, and onto roads.	Comply See above B1 comment
13. Inspecting and ensuring the maintenance of temporary erosion control measures at least: a. on a daily basis in areas of active construction or equipment operation; b. on a weekly basis in areas with no construction or equipment operation; and c. within 24 hours of each 0.5 inch of rainfall.	Item a. Do not comply Item b. Do not comply Item c. Do not comply See above B1 comment
14. Ensuring the repair of all ineffective temporary erosion control measures within 24 hours of identification.	Comply See above B1 comment.
15. Keeping records of compliance with the environmental conditions of the FERC certificate, and the mitigation measures proposed by the project sponsor in the application submitted to the FERC, and other Federal or state environmental permits during active construction and restoration.	Comply with RF requirements Construction and QC records kept on site by the Contractor. See B1 comment
16. Identifying areas that should be given special attention to ensure stabilization and restoration after the construction phase.	Comply This was done through the TEO-C submission and design, but if there is a clear discrepancy or omission, the environmental inspectors highlight in their daily reports.
III. PRECONSTRUCTION PLANNING	
A. CONSTRUCTION WORK AREAS	
1. Identify all construction work areas (e.g., construction right-of-way, extra work space areas, pipe storage and contractor yards, borrow and disposal areas, access roads, etc.) that would be needed for safe construction. The project sponsor must ensure that appropriate cultural resources and biological surveys have been conducted.	Comply (Soil Reclamation and Erosion Protection Plan - SREPP)
2. Project sponsors are encouraged to consider expanding any required cultural resources and endangered species surveys in anticipation of the need for activities outside of certificated work areas.	Access Roads included in surveys and no activities outside certificated work areas were foreseen. Comply with the Company's Treatment Plan for Objects of Cultural Heritage, now Cultural Heritage Protection Plan.
B. DRAIN TILE AND IRRIGATION SYSTEMS	
1. Attempt to locate existing drain tiles and irrigation systems.	Comply (Soil Reclamation and Erosion Protection Plan-SREPP) No known drain tiles
2. Contact landowners and local soil conservation authorities to determine the locations of future drain tiles that are likely to be installed within 3 years of the authorized construction.	Not applicable. No known future drain tile requirements
3. Develop procedures for constructing through drain tiled areas, maintaining irrigation systems during construction, and repairing drain tiles and irrigation systems after construction.	No known drain tiles. If irrigation/drainage systems located, systems to be restored after construction.
4. Engage qualified drain tile specialists, as needed to conduct or monitor repairs to drain tile systems affected by construction. Use drain tile specialists from the project area, if available.	No known drain tiles. However, specialist advice will be obtained if drain tiles identified.
C. GRAZING DEFERMENT	
Develop grazing deferment plans with willing landowners, grazing permittees, and land management agencies to minimize grazing	Not applicable Grazing deferments are not a revegetation



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disturbance of revegetation efforts.	issue. Specific mitigation included in Social Impact Assessment to address impacts on reindeer herders and pastures.
D. ROAD CROSSINGS AND ACCESS POINTS	
Plan for safe and accessible conditions at all roadway crossings and access points during construction and restoration.	Comply Site safety staff monitor safety aspects of access roads and recommend corrective action where deemed necessary.
E. DISPOSAL PLANNING	
Determine methods and locations for the disposal of construction debris (e.g., timber, slash, mats, garbage, drilling fluids, excess rock, etc). Off-site disposal in other than commercially operated disposal locations is subject to compliance with all applicable survey, landowner permission, and mitigation requirements.	Comply. Waste management requirements were included in the Contract with Starstroi, in line with Sakhalin Energy Waste Management Strategy.
F. AGENCY COORDINATION	
The project sponsor must coordinate with the appropriate local, state, and Federal agencies as outlined in this Plan and in the Certificate.	Comply with relevant RF regulations.
1. Obtain written recommendations from the local soil conservation authorities or land management agencies regarding permanent erosion control and revegetation specifications.	Comply with relevant RF regulations.
2. Develop specific procedures in coordination with the appropriate agency to prevent the introduction or spread of noxious weeds and soil pests resulting from construction and restoration activities.	Not a recognised risk. No specific RF regulations apply.
G. STORMWATER POLLUTION PREVENTION PLAN	
Make available on each construction spread the Stormwater Pollution Prevention Plan prepared for compliance with the U.S. Environmental Protection Agency's National Stormwater Program General Permit requirements.	Not applicable - requirement is U.S. specific. Comply with relevant RF regulations.
IV. INSTALLATION	
A. APPROVED AREAS OF DISTURBANCE	
1. Project-related ground disturbance shall be limited to the construction right-of-way, extra workspace areas, pipe storage yards, borrow and disposal areas, access roads, and other areas approved in the Certificate. Any project-related ground disturbing activities outside these Certificated areas, except those needed to Comply with the Plan and Procedures (e.g., slope breakers, energy-dissipating devices, dewatering structures, drain tile system repairs) will require prior Director approval. All construction or restoration activities outside of the Certificated areas are subject to all applicable survey and mitigation requirements.	Comply with relevant RF regulations.
2. The construction right-of-way width for a project shall not exceed 75 feet or that described in the FERC application unless otherwise modified by a Certificate condition. However, in limited, non-wetland areas, this construction right-of-way width may be expanded by up to 25 feet without Director approval to accommodate full construction right-of-way topsoil segregation and to ensure safe construction where topographic conditions (such as side-slopes) or soil limitations require it. Twenty-five feet of extra construction right-of-way width may also be used in limited, non-wetland or non-forested areas for truck turn-around where no reasonable alternative access exists. Project use of these additional limited areas is subject to landowner approval and compliance with all applicable survey and mitigation requirements. When such additional areas are used, each one	Comply with relevant RF regulations. The FERC Guidelines envision a single pipeline ROW with pipe diameter 30 inches or less. Given that the Project involved laying two pipelines on adjacent Rights-Of-Way, the Company complied with the FERC's intent.



Relevant Standard Requirements ¹	Project Specification
should be identified and the need explained in the weekly or biweekly construction reports to the FERC, if required. The following material should be included in the reports:	
a. The location of each additional area by station number and reference to a previously filed alignment sheet, or updated alignment sheets showing the additional areas;	Not applicable U.S. specific
b. Identification of where the Commission's records contain evidence that the additional areas were previously surveyed; and	Not applicable U.S. specific
c. A statement that landowner approval has been obtained and is available in project files. Prior written approval of the Director is required when the Certificated construction right-of-way width would be expanded by more than 25 feet.	Not applicable U.S. Specific
B. TOPSOIL SEGREGATION	
1. Unless the landowner or land management agency specifically approves otherwise, prevent the mixing of topsoil with subsoil by stripping topsoil from either the full work area or from the trench and subsoil storage area (ditch plus spoil side method) in: a) actively cultivated or rotated croplands and pastures; b) residential areas; c) hayfields; and d) other areas at the landowner's or land managing agency's request.	Comply with relevant RF regulations. (Soil Reclamation and Erosion Protection Plan – SREPP applies).
2. In residential areas importation of topsoil is an acceptable alternative to topsoil segregation.	Sakhalin Energy has no plans to import topsoil.
3. In deep soils (more than 12 inches of topsoil), segregate at least 12 inches of topsoil. In soils with less than 12 inches of topsoil make every effort to segregate the entire topsoil layer.	Comply with relevant RF regulations. (Soil Reclamation and Erosion Protection Plan - SREPP applies).
4. Where topsoil segregation is required, maintain separation of salvaged topsoil and subsoil throughout all construction activities.	Comply with relevant RF regulations (Soil Reclamation and Erosion Protection Plan - SREPP applies).
5. Segregated topsoil may not be used for padding the pipe.	Comply with relevant RF regulations (Soil Reclamation and Erosion Protection Plan - SREPP applies).
C. DRAIN TILES	
1. Mark locations of drain tiles damaged during construction.	Not applicable. No known drain tiles
2. Probe all drainage tile systems within the area of disturbance to check for damage.	Not applicable. No known drain tiles
3. Repair damaged drain tiles to their original or better condition. Do not use filter-covered drain tiles unless the local soil conservation authorities and the landowner agree. Use qualified specialists for testing and repairs.	Not applicable. No known drain tiles
4. For new pipelines in areas where drain tiles exist or are planned, ensure that the depth of cover over the pipeline is sufficient to avoid interference with drain tile systems. For adjacent pipeline loops in agricultural areas, install the new pipeline with at least the same depth of cover as the existing pipeline(s).	Not applicable. No known drain tiles
D. IRRIGATION	
Maintain water flow in crop irrigation systems, unless shutoff is coordinated with affected parties.	Comply
E. ROAD CROSSINGS AND ACCESS POINTS	
1. Maintain safe and accessible conditions at all road crossings and access points during construction.	Comply



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2. If crushed stone access pads are used in residential or active agricultural areas, place the stone on synthetic fabric to facilitate removal.	Comply Stone access pads unlikely to be used, where required use geotextile.
F. TEMPORARY EROSION CONTROL	
Install temporary erosion controls immediately after initial disturbance of the soil. Temporary erosion controls must be properly maintained throughout construction (on a daily basis) and reinstalled as necessary (such as after backfilling of the trench) until replaced by permanent erosion controls or restoration is complete.	Comply (Soil Reclamation and Erosion Protection Plan - SREPP applies).
1. Temporary Slope Breakers	
a. Temporary slope breakers are intended to reduce runoff velocity and divert water off the construction right-of-way. Temporary slope breakers may be constructed of materials such as soil, silt fence, staked hay or straw bales, or sand bags.	Comply (Soil Reclamation and Erosion Protection Plan - SREPP applies).
b. Install temporary slope breakers on all disturbed areas, as necessary to avoid excessive erosion. Temporary slope breakers must be installed on slopes greater than 5 percent where the base of the slope is less than 50 feet from waterbody, wetland, and road crossings at the following spacing (closer spacing should be used if necessary): Slope (%) Spacing (feet) 5 - 15 300 >15 - 30 200 >30 100	Comply Construction documents/drawings.
c. Direct the outfall of each temporary slope breaker to a stable, well vegetated area or construct an energy-dissipating device at the end of the slope breaker and off the construction right-of-way. d. Position the outfall of each temporary slope breaker to prevent sediment discharge into wetlands, waterbodies, or other sensitive resources.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
2. Sediment Barriers	
a. Sediment barriers are intended to stop the flow of sediments and to prevent the deposition of sediments into sensitive resources. They may be constructed of materials such as silt fence, staked hay or straw bales, compacted earth (e.g., driveable berms across travelways), sand bags, or other appropriate materials.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
b. At a minimum, install and maintain temporary sediment barriers across the entire construction right-of-way at the base of slopes greater than 5 percent where the base of the slope is less than 50 feet from a waterbody, wetland, or road crossing until revegetation is successful as defined in this Plan. Leave adequate room between the base of the slope and the sediment barrier to accommodate ponding of water and sediment deposition.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
c. Where wetlands or waterbodies are adjacent to and downslope of construction work areas, install sediment barriers along the edge of these areas, as necessary to prevent sediment flow into the wetland or waterbody.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
3. Mulch	Consider use of mulch , wherever applicable.
a. Apply mulch on all slopes (except in actively cultivated cropland) concurrent with or immediately after seeding, where necessary to stabilize the soil surface and to reduce wind and water erosion. Spread mulch uniformly over the area to cover at least 75 percent of the ground surface at a rate of 2 tons/acre of straw or its equivalent, unless the local soil conservation authority, landowner, or land managing agency approves otherwise in writing.	Consider use of mulch , wherever applicable.
b. Mulch can consist of weed-free straw or hay, wood fibre hydromulch, erosion control fabric, or some functional equivalent.	Consider use of mulch , wherever applicable.
c. Mulch before seeding if:(1) final grading and installation of	Consider use of mulch , wherever applicable.



Relevant Standard Requirements ¹	Project Specification
<p>permanent erosion control measures will not be completed in an area within 20 days after the trench in that area is backfilled (10 days in residential areas), as required in section V.A.1; or (2) construction or restoration activity is interrupted for extended periods, such as when seeding cannot be completed due to seeding period restrictions.</p>	
<p>d. If mulching before seeding, increase mulch application on all slopes within 100 feet of waterbodies and wetlands to a rate of 3 tons/acre of straw or equivalent.</p>	<p>Consider use of mulch , wherever applicable.</p>
<p>e. If wood chips are used as mulch, do not use more than 1 ton/acre and add the equivalent of 11lbs/acre available nitrogen (at least 50 percent of which is slow release).</p>	<p>Consider use of mulch , wherever applicable.</p>
<p>f. Ensure that mulch is adequately anchored to minimize loss due to wind and water.</p>	<p>Consider use of mulch , wherever applicable.</p>
<p>g. When anchoring with liquid mulch binders, use rates recommended by the manufacturer. Do not use liquid mulch binders within 100 feet of wetlands or waterbodies.</p>	<p>Consider use of mulch , wherever applicable.</p>
<p>h. Install erosion control fabric on waterbody banks at the time of final bank re-contouring. Anchor the erosion control fabric with staples or other appropriate devices.</p>	<p>Apply erosion control measures such as those outlined in the guideline.</p>
<p>V. RESTORATION</p>	
<p>A. CLEANUP</p>	
<p>1. Commence cleanup operations immediately following backfill operations. Complete final grading, topsoil replacement, and installation of permanent erosion control structures within 20 days after backfilling the trench (10 days in residential areas). If seasonal or other weather conditions prevent compliance with these time frames, maintain temporary erosion controls (temporary slope breakers and sediment barriers) until conditions allow completion of cleanup. The project sponsor should file with the Secretary for the review and written approval of the Director, a winterization plan if construction will continue into the winter season when conditions could delay successful decompaction, topsoil replacement, or seeding until the following spring.</p>	<p>Topsoil replacement can only be done after installation of fibre optic cable. Install and maintain temporary erosion protection . Winter construction is approved. (Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply).</p>
<p>2. A travel lane may be left open temporarily to allow access by construction traffic if the temporary erosion control structures are installed (as specified in section IV.F.) and inspected and maintained (as specified in sections II.B.12 through 14). When access is no longer required, the travel lane must be removed and the right-of-way restored.</p>	<p>Comply (Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply).</p>
<p>3. Rock excavated from the trench may be used to backfill the trench only to the top of the existing bedrock profile. Rock that is not returned to the trench should be considered construction debris, unless approved for use as mulch or for some other use on the construction work areas by the landowner or land managing agency.</p>	<p>Comply Have no plans to use rock as part of a trench crown or above a bedrock profile. Do not allow rock to be placed in close proximity to pipe in trench bottom.</p>
<p>4. Remove excess rock from at least the top 12 inches of soil in all actively cultivated or rotated cropland and pastures, hayfields, and residential areas, as well as other areas at the landowner's request. The size, density, and distribution of rock on the construction work area should be similar to adjacent areas not disturbed by construction. The landowner may approve other provisions in writing.</p>	<p>Not applicable.</p>
<p>5. Grade the construction right-of-way to restore preconstruction contours and leave the soil in the proper condition for planting.</p>	<p>Comply (Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply).</p>
<p>6. Remove construction debris from all construction work areas</p>	<p>Comply</p>



Relevant Standard Requirements ¹	Project Specification
unless the landowner or land managing agency approves otherwise.	(Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply).
7. Remove temporary sediment barriers when replaced by permanent erosion control measures or when revegetation is successful.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply).
B. PERMANENT EROSION CONTROL DEVICES	
1. Trench Breakers	
a. Trench breakers are intended to slow the flow of subsurface water along the trench. Trench breakers may be constructed of materials such as sand bags or polyurethane foam. Do not use topsoil in trench breakers.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies)
b. An engineer or similarly qualified professional shall determine the need for and spacing of trench breakers. Otherwise, trench breakers shall be installed at the same spacing as and upslope of permanent slope breakers.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
c. In agricultural fields and residential areas where slope breakers are not typically required, install trench breakers at the same spacing as if permanent slope breakers were required.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
d. At a minimum, install a trench breaker at the base of slopes greater than 5 percent where the base of the slope is less than 50 feet from a waterbody or wetland and where needed to avoid draining a waterbody or wetland.	Comply (Soil Reclamation and Erosion Protection Plan - SREPP applies).
2. Permanent Slope Breakers	
a. Permanent slope breakers are intended to reduce runoff velocity, divert water off the construction right-of-way, and prevent sediment deposition into sensitive resources. Permanent slope breakers may be constructed of materials such as soil, sand bags, or some functional equivalent.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
b. Construct and maintain permanent slope breakers in all areas, except cultivated areas and lawns, using spacing recommendations obtained from the local soil conservation authority or land managing agency. In the absence of written recommendations, use the following spacing unless closer spacing is necessary to avoid excessive erosion on the construction right-of-way: Slope (%) Spacing (feet) 5 - 15 300 >15 - 30 200 >30 100	Comply Construction documents and drawings
c. Construct slope breakers to divert surface flow to a stable area without causing water to pool or erode behind the breaker. In the absence of a stable area, construct appropriate energy dissipating devices at the end of the breaker.	Comply (Soil Reclamation and Erosion Protection Plan – SREPP applies).
d. Slope breakers may extend slightly (about 4 feet) beyond the edge of the construction right-of-way to effectively drain water off the disturbed area. Where slope breakers extend beyond the edge of the construction right-of-way, they are subject to compliance with all applicable survey requirements.	Not applicable - UXO risk.
C. SOIL COMPACTION MITIGATION	
1. Test topsoil and subsoil for compaction at regular intervals in agricultural and residential areas disturbed by construction activities. Conduct tests on the same soil type under similar moisture conditions in undisturbed areas to approximate preconstruction conditions. Use penetrometers or other appropriate devices to conduct tests.	Comply Soil compaction in relevant areas will be determined using appropriate techniques. Soil Reclamation and Erosion Protection Plan – SREPP applies.



Relevant Standard Requirements ¹	Project Specification
2. Plough severely compacted agricultural areas with a para-plough or other deep tillage implement. In areas where topsoil has been segregated, plough the subsoil before replacing the segregated topsoil. Alternatively, make arrangements with the landowner to plant and plough under a "green manure" crop, such as alfalfa, to decrease soil bulk density and improve soil structure. If subsequent construction and cleanup activities result in further compaction, conduct additional tilling.	Not applicable RF regulations apply. Will consult with local soil experts.
3. Perform appropriate soil compaction mitigation in severely compacted residential areas.	Not applicable. Have bypassed residential areas.
D. REVEGETATION	
1. General	
a. The project sponsor is responsible for ensuring successful revegetation of soils disturbed by project-related activities, except as noted in section V.D.1.b.	Comply
b. Restore all turf, ornamental shrubs, and specialized landscaping in accordance with the landowner's request, or compensate the landowner. Restoration work must be performed by personnel familiar with local horticultural and turf establishment practices.	Comply
2. Soil Additives	
Fertilize and add soil pH modifiers in accordance with written recommendations obtained from the local soil conservation authority, land management agencies, or landowner. Incorporate recommended soil pH modifier and fertilizer into the top 2 inches of soil as soon as possible after application.	Comply Soil Reclamation and Erosion Protection Plan – SREPP applies.
3. Seeding Requirements	
a. Prepare a seedbed in disturbed areas to a depth of 3 to 4 inches using appropriate equipment to provide a firm seedbed. When hydroseeding, scarify the seedbed to facilitate lodging and germination of seed.	Comply Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
b. Seed disturbed areas in accordance with written recommendations for seed mixes, rates, and dates obtained from the local soil conservation authority or as requested by the landowner or land management agency. Seeding is not required in actively cultivated croplands unless requested by the landowner.	Comply Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
c. Perform seeding of permanent vegetation within the recommended seeding dates. If seeding cannot be done within those dates, use appropriate temporary erosion control measures discussed in section IV.F. and perform seeding of permanent vegetation at the beginning of the next recommended seeding season. Lawns may be seeded on a schedule established with the landowner.	Comply Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
d. In the absence of written recommendations from the local soil conservation authorities, seed all disturbed soils within 6 working days of final grading, weather and soil conditions permitting, subject to the specifications in section V.D.3.a-c.	Comply Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
e. Base seeding rates on Pure Live Seed. Use seed within 12 months of seed testing.	Comply Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
f. Treat legume seed with an inoculant specific to the species using the manufacturer's recommended rate of inoculant appropriate for the seeding method (broadcast, drill, or hydro).	Not applicable Soil Reclamation and Erosion Protection Plan and local agency recommendations apply.
g. In the absence of written recommendations from the local soil conservation authorities, landowner, or land managing agency to the	Not applicable Soil Reclamation and Erosion Protection Plan



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<p>contrary, a seed drill equipped with a cultipacker is preferred for seed application. Broadcast or hydroseeding can be used in lieu of drilling at double the recommended seeding rates. Where seed is broadcast, firm the seedbed with a cultipacker or imprinter after seeding. In rocky soils or where site conditions may limit the effectiveness of this equipment, other alternatives may be appropriate (e.g., use of a chain drag) to lightly cover seed after application, as approved by the Environmental Inspector.</p>	<p>and local agency recommendations apply.</p>
<p>VI. OFF-ROAD VEHICLE CONTROL</p>	
<p>To each owner or manager of forested lands offer to install and maintain measures to control unauthorized vehicle access to the right-of-way. These measures may include:</p> <ul style="list-style-type: none"> a. Signs; b. Fences with locking gates; <p>Slash and timber barriers, pipe barriers, or a line of boulders across the right-of-way; and Conifers or other appropriate trees or shrubs across the right-of-way.</p>	<p>Comply Report unauthorized access. Install signs at critical areas.</p>
<p>VII. POST-CONSTRUCTION ACTIVITIES</p>	
<p>A. MONITORING AND MAINTENANCE</p>	
<p>1. Conduct follow-up inspections of all disturbed areas after the first and second growing seasons to determine the success of revegetation.</p>	<p>Comply</p>
<p>2. Revegetation in non-agricultural areas shall be considered successful if upon visual survey the density and cover of non-nuisance vegetation are similar in density and cover to adjacent undisturbed lands. In agricultural areas, revegetation shall be considered successful if crop yields are similar to adjacent undisturbed portions of the same field. Continue revegetation efforts until revegetation is successful.</p>	<p>Comply Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply.</p>
<p>3. Monitor and correct problems with drainage and irrigation systems resulting from pipeline construction in active agricultural areas until restoration is successful.</p>	<p>Comply Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply.</p>
<p>4. Restoration shall be considered successful if the right-of-way surface condition is similar to adjacent undisturbed lands, construction debris is removed (unless requested otherwise by the land owner or land managing agency), revegetation is successful, and proper drainage has been restored.</p>	<p>Comply Soil Reclamation and Erosion Protection Plan – SREPP and method statement “reinstatement & final clean up of ROW” apply.</p>
<p>5. Routine vegetation maintenance clearing shall not be done more frequently than every 3 years. However, to facilitate periodic corrosion and leak surveys, a corridor not exceeding 10 feet in width centred on the pipeline may be maintained annually in a herbaceous state. In no case shall routine vegetation maintenance clearing occur between April 15 and August 1 of any year.</p>	<p>Will comply with RF regulations and local agency direction. 15 April to 1 August dates may not apply as this is U.S. specific.</p>
<p>6. Efforts to control unauthorized off-road vehicle use, in cooperation with the landowner, shall continue throughout the life of the project. Maintain signs, gates, and vehicle trails as necessary.</p>	<p>Comply</p>
<p>B. REPORTING</p>	
<p>1. The project sponsor shall maintain records that identify by milepost: a) method of application, application rate, and type of fertilizer, pH modifying agent, seed, and mulch used; b) acreage treated; c) dates of backfilling and seeding; d) names of landowners requesting special seeding treatment and a description of the follow-</p>	<p>Do not Comply RF regulations apply</p>



Land Management Standard

Rev 06

Relevant Standard Requirements ¹	Project Specification
up actions; and e) any problem areas and how they were addressed.	
2. The project sponsor shall file with the Secretary quarterly activity reports documenting problems, including those identified by the landowner, and corrective actions taken for at least 2 years following construction.	Not applicable U.S. specific

FERC WETLAND AND WATERBODY CONSTRUCTION PROCEDURES (2003)

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II. PRECONSTRUCTION FILING	
A. The following information shall be filed prior to the beginning of construction:	Not applicable U.S. specific requirement. Filings are in accordance with RF regulations.
1. The hydrostatic testing information specified in section VII.B.3 and a wetland delineation report as described in section VI.A.1, if applicable.	Comply Hydrotesting conforms with RF regulations
2. A schedule identifying when trenching or blasting would occur within each waterbody greater than 10 feet wide, or within any designated coldwater fishery. The project sponsor shall revise the schedule as necessary to provide FERC staff at least 14 days advance notice. Changes within this last 14-day period must provide for at least 48 hours advance notice.	Not applicable All coldwater fisheries work done in accordance with RF direction.
B. The following site-specific construction plans required by these Procedures must be filed with the Secretary for the review and written approval by the Director:	Not applicable Requirements are unique to U.S. regulatory framework. See comments below.
1. Plans for extra work areas that would be closer than 50 feet from a waterbody or wetland;	Comply * Added to River Crossing Strategy where applicable to waterbody crossings. * Not applicable to work within certain wetlands; ex. push pull pipe laying operation.
2. Plans for major waterbody crossings;	Comply As agreed with RF regulatory agencies.
3. Plans for the use of a construction right-of-way greater than 75 feet wide in wetlands; and	Comply The FERC Guidelines envisage a single pipeline ROW with pipe diameter 30 inches or less. Given that Sakhalin Energy is laying two pipelines on adjacent Rights-Of-Way, Sakhalin Energy conformed with the FERC's intent.
4. Plans for horizontal directional drill (HDD) "crossings" of wetlands or waterbodies.	No plans to horizontally drill any wetlands, other than the Chaivo Lagoon.



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III. ENVIRONMENTAL INSPECTORS	
<p>At least one Environmental Inspector having knowledge of the wetland and waterbody conditions in the project area is required for each construction spread. The number and experience of Environmental Inspectors assigned to each construction spread should be appropriate for the length of the construction spread and the number/significance of resources affected.</p>	<p>Comply Environmental Monitoring Plan.</p>
<p>B. The Environmental Inspector's responsibilities are outlined in the Upland Erosion Control, Revegetation and Maintenance Plan (Plan).</p>	<p>Comply Environmental Monitoring Plan.</p>
IV. PRECONSTRUCTION PLANNING	
<p>A. A copy of the Stormwater Pollution Prevention Plan (SWPPP) prepared for compliance with the U.S. Environmental Protection Agency's (EPA) National Stormwater Program General Permit requirements must be available in the field on each construction spread. The SWPPP shall contain Spill Prevention and Response Procedures that meet the requirements of state and Federal agencies.</p>	<p>Not applicable U.S. specific Conforming to RF regulations</p>
<p>1. It shall be the responsibility of the project sponsor and its contractors to structure their operations in a manner that reduces the risk of spills or the accidental exposure of fuels or hazardous materials to waterbodies or wetlands. The project sponsor and its contractors must, at a minimum, ensure that:</p>	<p>Comply</p>
<p>a. All employees handling fuels and other hazardous materials are properly trained;</p>	<p>Comply</p>
<p>b. All equipment is in good operating order and inspected on a regular basis;</p>	<p>Comply</p>
<p>c. Fuel trucks transporting fuel to on-site equipment travel only on approved access roads;</p>	<p>Comply</p>
<p>d. All equipment is parked overnight and/or fuelled at least 100 feet from a waterbody or in an upland area at least 100 feet from a wetland boundary. These activities can occur closer only if the Environmental Inspector finds, in advance, no reasonable alternative and the project sponsor and its contractors have taken appropriate steps (including secondary containment structures) to prevent spills and provide for prompt cleanup in the event of a spill;</p>	<p>Comply wherever possible. Some of the wetland crossings were quite long, hence difficult to move the equipment every evening and reposition the next day.</p>
<p>e. Hazardous materials, including chemicals, fuels, and lubricating oils, are not stored within 100 feet of a wetland, waterbody, or designated municipal watershed area, unless the location is designated for such use by an appropriate governmental authority. This applies to storage of these materials and does not apply to normal operation or use of equipment in these areas;</p>	<p>Comply</p>
<p>f. Concrete coating activities are not performed within 100 feet of a wetland or waterbody boundary, unless the location is an existing industrial site designated for such use.</p>	<p>Not applicable. There will be no concrete pipe coating.</p>
<p>2. The project sponsor and its contractors must structure their operations in a manner that provides for the prompt and effective cleanup of spills of fuel and other hazardous materials. At a minimum, the project sponsor and its contractors must:</p>	<p>Comply</p>



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a. Ensure that each construction crew (including cleanup crews) has on hand sufficient supplies of absorbent and barrier materials to allow the rapid containment and recovery of spilled materials and knows the procedure for reporting spills;	Comply
b. Ensure that each construction crew has on hand sufficient tools and material to stop leaks;	Comply
c. Know the contact names and telephone numbers for all local, state, and Federal agencies that must be notified of a spill; and	Comply
d. Follow the requirements of those agencies in cleaning up the spill, in excavating and disposing of soils or other materials contaminated by a spill, and in collecting and disposing of waste generated during spill cleanup.	Comply
B. AGENCY COORDINATION	
The project sponsor must coordinate with the appropriate local, state, and Federal agencies as outlined in these Procedures and in the Certificate.	Comply
V. WATERBODY CROSSINGS	
A. NOTIFICATION PROCEDURES AND PERMITS	
1. Apply to the U.S. Army Corps of Engineers (COE), or its delegated agency, for the appropriate wetland and waterbody crossing permits.	Relevant RF regulations apply
2. Provide written notification to authorities responsible for potable surface water supply intakes located within 3 miles downstream of the crossing at least 1 week before beginning work in the waterbody, or as otherwise specified by that authority.	Relevant RF regulations apply
3. Apply for state-issued waterbody crossing permits and obtain individual or generic section 401 water quality certification or waiver.	Relevant RF regulations apply
4. Notify appropriate state authorities at least 48 hours before beginning trenching or blasting within the waterbody, or as specified in state permits.	Relevant RF regulations apply
B. INSTALLATION	
1. Time Window for construction, unless expressly permitted or further restricted by the appropriate state agency in writing on a site specific basis, in-stream work, except that required to install or remove equipment bridges, must occur during the following time windows:	Comply Sakhalin Energy performed stream crossings at a time agreed with RF agencies.
a. Coldwater fisheries - June 1 through September 30; and	
b. coolwater and warmwater fisheries - June 1 through November 30.	
2. Extra Work Areas:	



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a. Locate all extra work areas (such as staging areas and additional spoil storage areas) at least 50 feet away from water's edge, except where the adjacent upland consists of actively cultivated or rotated cropland or other disturbed land.	Comply with relevant RF regulations
b. The project sponsor shall file with the Secretary for review and written approval by the Director, a site-specific construction plan for each extra work area with a less than 50ft setback from the water's edge, (except where the adjacent upland consists of actively cultivated or rotated cropland or other disturbed land) and a site-specific explanation of the conditions that will not permit a 50ft setback.	Not applicable Specific to U.S. legal/regulatory requirements
c. Limit clearing of vegetation between extra work areas and the edge of the waterbody to the certificated construction right-of-way.	Comply
d. Limit the size of extra work areas to the minimum needed to construct the waterbody crossing.	Comply
3. General Crossing Procedures	
a. Comply with the COE, or its delegated agency, permit terms and conditions.	Not applicable Specific to U.S. legal/regulatory requirement. Relevant RF regulations apply
b. Construct crossings as close to perpendicular to the axis of the waterbody channel as engineering and routing conditions permit.	Comply
c. If the pipeline parallels a waterbody, attempt to maintain at least 15 feet of undisturbed vegetation between the waterbody (and any adjacent wetland) and the construction right-of-way.	Comply
d. Where waterbodies meander or have multiple channels, route the pipeline to minimise the number of waterbody crossings.	Comply
e. Maintain adequate flow rates to protect aquatic life, and prevent the interruption of existing downstream uses.	Comply
f. Waterbody buffers (extra work area setbacks, refuelling restrictions, etc.) must be clearly marked in the field with signs and/or highly visible flagging until construction-related ground disturbing activities are complete.	Comply
4. Spoil Pile Placement and Control	
a. All spoil from minor and intermediate waterbody crossings, and upland spoil from major waterbody crossings, must be placed in the construction right-of-way at least 10 feet from the water's edge or in additional extra work areas as described in section V.B.2.	Comply Section 8.2.2 of SREPP.
b. Use sediment barriers to prevent the flow of spoil or heavily silt-laden water into any waterbody.	Comply Section 9.3.2 of SREPP.
5. Equipment Bridges	
a. Only clearing equipment and equipment necessary for installation of equipment bridges may cross waterbodies prior to bridge installation. Limit the number of such crossings of each waterbody to one per piece of clearing equipment.	Comply



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b. Construct equipment bridges to maintain unrestricted flow and to prevent soil from entering the waterbody. Examples of such bridges include:	Comply
(1) equipment pads and culvert(s);	Comply
(2) equipment pads or railroad car bridges without culverts;	Comply
(3) clean rock fill and culvert(s); and	Comply
(4) flexi-float or portable bridges. Additional options for equipment bridges may be utilized that achieve the performance objectives noted above. Do not use soil to construct or stabilize equipment bridges.	Not applicable
c. Design and maintain each equipment bridge to withstand and pass the highest flow expected to occur while the bridge is in place. Align culverts to prevent bank erosion or streambed scour. If necessary, install energy dissipating devices downstream of the culverts.	Comply
d. Design and maintain equipment bridges to prevent soil from entering the waterbody.	Comply
e. Remove equipment bridges as soon as possible after permanent seeding unless the COE, or its delegated agency, authorises it as a permanent bridge.	Comply
f. If there will be more than 1 month between final cleanup and the beginning of permanent seeding and reasonable alternative access to the right-of-way is available, remove equipment bridges as soon as possible after final cleanup.	Not possible because of timing issues with oil and gas pipeline construction schedules.
6. Dry-Ditch Crossing Methods	Not applicable The Russian authorities do not permit dry crossings.
a. Unless approved otherwise by the appropriate state agency, install the pipeline using one of the dry-ditch methods outlined below for crossings of waterbodies up to 30 feet wide (at the water's edge at the time of construction) that are state-designated as either coldwater or significant coolwater or warmwater fisheries.	Not applicable
b. Dam and Pump	
(1) The dam-and-pump method may be used without prior approval for crossings of waterbodies where pumps can adequately transfer streamflow volumes around the work area, and there are no concerns about sensitive species passage.	Not applicable
(2) Implementation of the dam-and-pump crossing method must meet the following performance criteria:	Not applicable
(i) use sufficient pumps, including onsite backup pumps, to maintain downstream flows;	Not applicable
(ii) construct dams with materials that prevent sediment and other pollutants from entering the waterbody (e.g. sandbags or clean gravel with plastic liner);	Not applicable
(iii) screen pump intakes;	Not applicable
(iv) prevent streambed scour at pump discharge; and	Not applicable
(v) monitor the dam and pumps to ensure proper operation throughout the waterbody crossing.	Not applicable
c. Flume Crossing:	
(1) Install flume pipe after blasting (if necessary), but before any trenching;	Comply



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(2) Use sand bag or sand bag and plastic sheeting diversion structure or equivalent to develop an effective seal and to divert stream flow through the flume pipe (some modifications to the stream bottom may be required in to achieve an effective seal);	Comply
(3) Properly align flume pipe(s) to prevent bank erosion and streambed scour;	Comply
(4) Do not remove flume pipe during trenching, pipelaying, or backfilling activities, or initial streambed restoration efforts; and	Comply
(5) Remove all flume pipes and dams that are not also part of the equipment bridge as soon as final cleanup of the streambed and bank is complete.	Comply
d. Horizontal Directional Drill (HDD): To the extent they were not provided as part of the pre-certification process, for each waterbody or wetland that would be crossed using the HDD method, provide a plan that includes:	Comply
(1) Site-specific construction diagrams that show the location of mud pits, pipe assembly areas, and all areas to be disturbed or cleared for construction;	Comply
(2) A description of how an inadvertent release of drilling mud would be contained and cleaned up; and	Comply
(3) A contingency plan for crossing the waterbody or wetland in the event the directional drill is unsuccessful and how the abandoned drill hole would be sealed, if necessary.	Comply
7. Crossings of Minor Waterbodies. Where a dry-ditch crossing is not required, minor waterbodies may be crossed using the open-cut crossing method, with the following restrictions:	Comply
a. Except for blasting and other rock breaking measures, complete instream construction activities (including trenching, pipe installation, backfill, and restoration of the streambed contours) within 24 hours. Streambanks and unconsolidated streambeds may require additional restoration after this period;	Comply
b. Limit use of equipment operating in the waterbody to that needed to construct the crossing; and	Comply
c. Equipment bridges are not required at minor waterbodies that do not have a state-designated fishery classification (e.g., agricultural or intermittent drainage ditches). However, if an equipment bridge is used it must be constructed as described in section V.B.5.	Comply
8. Crossings of Intermediate Waterbodies. Where a dry-ditch crossing is not required, intermediate waterbodies may be crossed using the open-cut crossing method, with the following restrictions:	
a. Complete instream construction activities (not including blasting and other rock breaking measures) within 48 hours, unless site-specific conditions make completion within 48 hours infeasible;	Comply
b. Limit use of equipment operating in the waterbody to that needed to construct the crossing; and	Comply
c. all other construction equipment must cross on an equipment bridge as specified in section V.B.5.	Comply
9. Crossings of Major Waterbodies	



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<p>Before construction, the project sponsor shall file with the Secretary for the review and written approval by the Director a detailed, site-specific construction plan and scaled drawings identifying all areas to be disturbed by construction for each major waterbody crossing (the scaled drawings are not required for any offshore portions of pipeline projects). This plan should be developed in consultation with the appropriate state and Federal agencies and should include extra work areas, spoil storage areas, sediment control structures, etc., as well as mitigation for navigational issues. The Environmental Inspector may adjust the final placement of the erosion and sediment control structures in the field to maximize effectiveness.</p>	<p>Comply RF equivalent of this instruction applies.</p>
<p>10. Temporary Erosion and Sediment Control</p>	
<p>Install sediment barriers (as defined in section IV.F.2.a. of the Plan) immediately after initial disturbance of the waterbody or adjacent upland. Sediment barriers must be properly maintained throughout construction and reinstalled as necessary (such as after backfilling of the trench) until replaced by permanent erosion controls or restoration of adjacent upland areas is complete. Temporary erosion and sediment control measures are addressed in more detail in the Plan; however, the following specific measures must be implemented at stream crossings:</p>	<p>Comply As per River Crossing Strategy</p>
<ul style="list-style-type: none"> ○ Install sediment barriers across the entire construction right-of-way at all waterbody crossings, where necessary to prevent the flow of sediments into the waterbody. In the travel lane, these may consist of removable sediment barriers or driveable berms. Removable sediment barriers can be removed during the construction day, but must be re-installed after construction has stopped for the day and/or when heavy precipitation is imminent; 	
<ul style="list-style-type: none"> ○ Where waterbodies are adjacent to the construction right-of-way, install sediment barriers along the edge of the construction right-of-way as necessary to contain spoil and sediment within the construction right-of-way; and 	
<ul style="list-style-type: none"> ○ Use trench plugs at all waterbody crossings, as necessary, to prevent diversion of water into upland portions of the pipeline trench and to keep any accumulated trench water out of the waterbody. 	
<p>11. Trench Dewatering</p>	
<p>Dewater the trench (either on or off the construction right-of-way) in a manner that does not cause erosion and does not result in heavily silt-laden water flowing into any waterbody. Remove the dewatering structures as soon as possible after the completion of dewatering activities.</p>	<p>Comply</p>
<p>C. RESTORATION</p>	
<p>1. Use clean gravel or native cobbles for the upper 1 foot of trench backfill in all waterbodies that contain coldwater fisheries.</p>	<p>Comply As per River Crossing Strategy</p>
<p>2. For open-cut crossings, stabilize waterbody banks and install temporary sediment barriers within 24 hours of completing instream construction activities. For dry-ditch crossings, complete streambed and bank stabilization before returning flow to the waterbody channel.</p>	<p>Comply</p>
<p>3. Return all waterbody banks to preconstruction contours or to a stable angle of repose as approved by the Environmental Inspector.</p>	<p>Comply</p>



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4. Application of riprap for bank stabilization must conform with COE, or its delegated agency, permit terms and conditions.	Comply In accordance with relevant RF regulations
5. Unless otherwise specified by state permit, limit the use of riprap to areas where flow conditions preclude effective vegetative stabilization techniques such as seeding and erosion control fabric.	Comply In accordance with relevant RF regulations
6. Revegetate disturbed riparian areas with conservation grasses and legumes or native plant species, preferably woody species.	Comply In accordance with relevant RF regulations
7. Install a permanent slope breaker across the construction right-of-way at the base of slopes greater than 5 percent that are less than 50 feet from the waterbody, or as needed to prevent sediment transport into the waterbody. In addition, install sediment barriers as outlined in the Plan. In some areas, with the approval of the Environmental Inspector, an earthen berm may be suitable as a sediment barrier adjacent to the waterbody.	Comply As per Method Statement
8. Sections V.C.3. through V.C.6. above also apply to those perennial or intermittent streams not flowing at the time of construction.	Comply
D. POST-CONSTRUCTION MAINTENANCE	
1. Limit vegetation maintenance adjacent to waterbodies to allow a riparian strip at least 25 feet wide, as measured from the waterbody's mean high water mark, to permanently revegetate with native plant species across the entire construction right-of-way. However, to facilitate periodic pipeline corrosion/leak surveys, a corridor centred on the pipeline and up to 10 feet wide may be maintained in a herbaceous state. In addition, trees that are located within 15 feet of the pipeline that are greater than 15 feet in height may be cut and removed from the permanent right-of-way.	Comply
2. Do not use herbicides or pesticides in or within 100ft of a waterbody except as allowed by the appropriate land management or state agency.	Comply
VI. WETLAND CROSSINGS	
A. GENERAL	
1. The project sponsor shall conduct a wetland delineation using the current Federal methodology and file a wetland delineation report with the Secretary before construction. This report shall identify:	Comply Have delineated wetlands according to RF requirements ("swamp inventory").
a. by milepost all wetlands that would be affected;	Comply
b. the National Wetlands Inventory (NWI) classification for each wetland;	Not applicable
c. the crossing length of each wetland in feet; and	Comply (in meters)
d. the area of permanent and temporary disturbance that would occur in each wetland by NWI classification type.	Comply Sakhalin Energy has made calculations to RF classification standards
The requirements outlined in this section do not apply to wetlands in actively cultivated or rotated cropland. Standard upland protective measures, including workspace and topsoiling requirements, apply to these agricultural wetlands.	Comply



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<p>2. Route the pipeline to avoid wetland areas to the maximum extent possible. If a wetland cannot be avoided or crossed by following an existing right-of-way, route the new pipeline in a manner that minimizes disturbance to wetlands. Where looping an existing pipeline, overlap the existing pipeline right-of-way with the new construction right-of-way. In addition, locate the loop line no more than 25 feet away from the existing pipeline unless site-specific constraints would adversely affect the stability of the existing pipeline.</p>	<p>Comply ROW to the extent possible follows existing power, pipeline, or transport ROW down the island.</p>
<p>3. Limit the width of the construction right-of-way to 75 feet or less. Prior written approval of the Director is required where topographic conditions or soil limitations require that the construction right-of-way width within the boundaries of a federally delineated wetland be expanded beyond 75 feet. Early in the planning process the project sponsor is encouraged to identify site-specific areas where existing soils lack adequate unconfined compressive strength that would result in excessively wide ditches and/or difficult to contain spoil piles.</p>	<p>Comply The FERC Guidelines envisage a single pipeline ROW with pipe diameter 30 inches or less. Given that Sakhalin Energy laid two pipelines on adjacent ROW, we conformed with the FERC's intent.</p>
<p>4. Wetland boundaries and buffers must be clearly marked in the field with signs and/or highly visible flagging until construction-related ground disturbing activities are complete.</p>	<p>Comply Swamp Crossing Method Statement</p>
<p>5. Implement the measures of sections V and VI in the event a waterbody crossing is located within or adjacent to a wetland crossing. If all measures of sections V and VI cannot be met, the project sponsor must file with the Secretary a site-specific crossing plan for review and written approval by the Director before construction. This crossing plan shall address at a minimum:</p>	<p>Not applicable U.S. specific.</p>
<p>a. spoil control; b. equipment bridges; c. restoration of waterbody banks and wetland hydrology; d. timing of the waterbody crossing; e. method of crossing; and f. size and location of all extra work areas.</p>	<p>Comply RF equivalent of this instruction applies.</p>
<p>6. Do not locate aboveground facilities in any wetland [except where the location of such facilities outside of wetlands would prohibit compliance with U.S. Department of Transportation regulations.]</p>	<p>Comply No aboveground facilities within significant wetlands.</p>
<p>B. INSTALLATION</p>	
<p>1. Extra Work Areas and Access Roads</p>	
<p>a. Locate all extra work areas (such as staging areas and additional spoil storage areas) at least 50 feet away from wetland boundaries, except where the adjacent upland consists of actively cultivated or rotated cropland or other disturbed land.</p>	<p>Comply Formed a component of the Swamp Crossing Method Statement. Not possible to conform if the push-pull method of pipe welding and stringing is used. However, this point is largely irrelevant as most work was done in winter when both upland and lowland areas are frozen.</p>
<p>b. The project sponsor shall file with the Secretary for review and written approval by the Director, a site-specific construction plan for each extra work area with a less than 50-foot setback from wetland boundaries (except where adjacent upland consists of actively cultivated or rotated cropland or other disturbed land) and a site-specific explanation of the conditions that will not permit a 50-foot setback.</p>	<p>Not applicable Comply with relevant RF regulations.</p>



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c. Limit clearing of vegetation between extra work areas and the edge of the wetland to the certificated construction right-of-way.	Comply
<p>d. The construction right-of-way may be used for access when the wetland soil is firm enough to avoid rutting or the construction right-of-way has been appropriately stabilized to avoid rutting (e.g., with timber riprap, prefabricated equipment mats, or terra mats).</p> <p>In wetlands that cannot be appropriately stabilized, all construction equipment other than that needed to install the wetland crossing shall use access roads located in upland areas. Where access roads in upland areas do not provide reasonable access, limit all other construction equipment to one pass through the wetland using the construction right-of-way.</p>	<p>Comply</p> <p>Formed a component of the Swamp Crossing Method Statement. Peat bogs crossed in winter when frozen. Other low ground pressure areas, peaty soils or saturated soils exhibiting various stages of hydromorphism crossed as appropriate, when frozen or when non-frozen on timber mats.</p>
e. The only access roads, other than the construction right-of-way, that can be used in wetlands without Director approval, are those existing roads that can be used with no modification and no impact on the wetland.	<p>Not applicable</p> <p>Comply with relevant RF regulations.</p>
2. Crossing Procedures	
a. Comply with COE, or its delegated agency, permit terms and conditions	Comply with relevant RF regulations.
b. Assemble the pipeline in an upland area unless the wetland is dry enough to adequately support skids and pipe.	<p>Comply</p> <p>Work accomplished mostly in winter or from timber roads/mats.</p>
c. Use "push-pull" or "float" techniques to place the pipe in the trench where water and other site conditions allow.	Comply
d. Minimize the length of time that topsoil is segregated and the trench is open.	<p>Not applicable.</p> <p>RF regulations do not require the segregation of wetland topsoils.</p>
e. Limit construction equipment operating in wetland areas to that needed to clear the construction right-of-way, dig the trench, fabricate and install the pipeline, backfill the trench, and restore the construction right-of-way.	<p>Comply</p> <p>(Swamp Crossing Method Statement)</p>
f. Cut vegetation just aboveground level, leaving existing root systems in place, and remove it from the wetland for disposal.	<p>Comply</p> <p>(Swamp Crossing Method Statement)</p>
g. Limit pulling of tree stumps and grading activities to directly over the trenchline. Do not grade or remove stumps or root systems from the rest of the construction right-of-way in wetlands unless the Chief Inspector and Environmental Inspector determine that safety related construction constraints require grading or the removal of tree stumps from under the working side of the construction right-of-way.	<p>Comply</p> <p>(Swamp Crossing Method Statement)</p>
h. Segregate the top 1 foot of topsoil from the area disturbed by trenching, except in areas where standing water is present or soils are saturated or frozen. Immediately after backfilling is complete, restore the segregated topsoil to its original location	<p>Comply</p> <p>Comply with relevant RF regulations.</p> <p>In peat bogs, segregate upper sphagnum moss cover.</p> <p>(Swamp Crossing Method Statement).</p>
i. Do not use rock, soil imported from outside the wetland, tree stumps, or brush riprap to support equipment on the construction right-of-way.	<p>Comply</p> <p>(Swamp Crossing Method Statement)</p>
j. If standing water or saturated soils are present, or if construction equipment causes ruts or mixing of the topsoil and subsoil in wetlands, use low-ground-weight construction equipment, or operate normal equipment on timber riprap, prefabricated equipment mats, or terra mats.	<p>Comply</p> <p>(Swamp Crossing Method Statement)</p>



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k. Do not cut trees outside of the approved construction work area to obtain timber for riprap or equipment mats.	Comply (Swamp Crossing Method Statement)
l. Attempt to use no more than two layers of timber riprap to support equipment on the construction right-of-way.	Comply (Swamp Crossing Method Statement)
m. Remove all project-related material used to support equipment on the construction right-of-way upon completion of construction.	Comply (Swamp Crossing Method Statement)
3. Temporary Sediment Control	
Install sediment barriers (as defined in section IV.F.2.a. of the Plan) immediately after initial disturbance of the wetland or adjacent upland. Sediment barriers must be properly maintained throughout construction and reinstalled as necessary (such as after backfilling of the trench). Except as noted below in section VI.B.3.c., maintain sediment barriers until replaced by permanent erosion controls or restoration of adjacent upland areas is complete. Temporary erosion and sediment control measures are addressed in more detail in the Plan.	Comply (Swamp Crossing Method Statement)
a. Install sediment barriers across the entire construction right-of-way at all wetland crossings where necessary to prevent sediment flow into the wetland. In the travel lane, these may consist of removable sediment barriers or driveable berms. Removable sediment barriers can be removed during the construction day, but must be re-installed after construction has stopped for the day and/or when heavy precipitation is imminent.	Comply (Swamp Crossing Method Statement)
b. Where wetlands are adjacent to the construction right-of-way and the right-of-way slopes toward the wetland, install sediment barriers along the edge of the construction right-of-way as necessary to prevent sediment flow into the wetland.	Comply (Swamp Crossing Method Statement)
c. Install sediment barriers along the edge of the construction right-of-way as necessary to contain spoil and sediment within the construction right-of-way through wetlands. Remove these sediment barriers during right-of-way cleanup.	Comply (Swamp Crossing Method Statement)
4. Trench Dewatering	
Dewater the trench (either on or off the construction right-of-way) in a manner that does not cause erosion and does not result in heavily silt-laden water flowing into any wetland. Remove the dewatering structures as soon as possible after the completion of dewatering activities.	Comply (Swamp Crossing Method Statement)
1. Where the pipeline trench may drain a wetland, construct trench breakers and/or seal the trench bottom as necessary to maintain the original wetland hydrology.	Comply (Swamp Crossing Method Statement)
2. For each wetland crossed, install a trench breaker at the base of slopes near the boundary between the wetland and adjacent upland areas. Install a permanent slope breaker across the construction right-of-way at the base of a slopes greater than 5% where the base of the slope is less than 50 feet from the wetland, or as needed to prevent sediment transport into the wetland. In addition, install sediment barriers as outlined in the Plan. In some areas, with the approval of the Environmental Inspector, an earthen berm may be suitable as a sediment barrier adjacent to the wetland.	Comply (Swamp Crossing Method Statement)
3. Do not use fertilizer, lime, or mulch unless required in writing by the appropriate land management or state agency.	Comply (Swamp Crossing Method Statement)



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<p>4. Consult with the appropriate land management or state agency to develop a project-specific wetland restoration plan. The restoration plan should include measures for re-establishing herbaceous and/or woody species, controlling the invasion and spread of undesirable exotic species (e.g., purple loosestrife and phragmites), and monitoring the success of the revegetation and weed control efforts. Provide this plan to the FERC staff upon request.</p>	<p>Not applicable as U.S. specific.</p> <p>Contractors aware of the need to consult with local land management agencies.</p>
<p>5. Until a project-specific wetland restoration plan is developed and/or implemented, temporarily revegetate the construction right-of-way with annual ryegrass at a rate of 40 pounds/acre (unless standing water is present).</p>	<p>Not applicable</p> <p>SREPP details revegetation process and requirements. Agreed with Oblast agricultural agencies to use meadow fescue grass mix for temporary revegetation.</p>
<p>6. Ensure that all disturbed areas successfully revegetate with wetland herbaceous and/or woody plant species.</p>	<p>Comply</p> <p>SREPP</p>
<p>7. Remove temporary sediment barriers located at the boundary between wetland and adjacent upland areas after upland revegetation and stabilization of adjacent upland areas are judged to be successful as specified in section VII.A.5 of the Plan.</p>	<p>Comply</p> <p>A requirement of the SREPP</p>
<p>D. POST-CONSTRUCTION MAINTENANCE</p>	
<p>1. Do not conduct vegetation maintenance over the full width of the permanent right-of-way in wetlands. However, to facilitate periodic pipeline corrosion/leak surveys, a corridor centred on the pipeline and up to 10 feet wide may be maintained in a herbaceous state. In addition, trees within 15 feet of the pipeline that are greater than 15 feet in height may be selectively cut and removed from the permanent right-of-way.</p>	<p>Comply</p>
<p>2. Do not use herbicides or pesticides in or within 100 feet of a wetland, except as allowed by the appropriate land management agency or state agency.</p>	<p>Comply</p>
<p>3. Monitor and record the success of wetland revegetation annually for the first 3 years after construction or until wetland revegetation is successful. At the end of 3 years after construction, file a report with the Secretary identifying the status of the wetland revegetation efforts. Include the percent cover achieved and problem areas (weed invasion issues, poor revegetation, etc.). Continue to file a report annually until wetland revegetation is successful.</p>	<p>Comply</p> <p>RF regulations apply.</p>
<p>4. Wetland revegetation shall be considered successful if the cover of herbaceous and/or woody species is at least 80 percent of the type, density, and distribution of the vegetation in adjacent wetland areas that were not disturbed by construction. If revegetation is not successful at the end of 3 years, develop and implement (in consultation with a professional wetland ecologist) a remedial revegetation plan to actively revegetate the wetland. Continue revegetation efforts until wetland revegetation is successful.</p>	<p>Comply</p>
<p>VII. HYDROSTATIC TESTING</p>	
<p>A. NOTIFICATION PROCEDURES AND PERMITS</p>	
<p>1. Apply for state-issued water withdrawal permits, as required.</p>	<p>Comply</p>
<p>2. Apply for National Pollutant Discharge Elimination System (NPDES) or state-issued discharge permits, as required.</p>	<p>Not applicable (U.S. specific)</p>



Relevant Standard Requirements	Project Specification
3. Notify appropriate state agencies of intent to use specific sources at least 48 hours before testing activities unless they waive this requirement in writing.	Comply with relevant RF regulations
B. GENERAL	
1. Perform non-destructive testing of all pipeline section welds or hydrotest the pipeline sections, before installation under waterbodies or wetlands.	Comply Contractor committed to 100% X-ray of welds.
2. If pumps used for hydrostatic testing are within 100 feet of any waterbody or wetland, address the operation and refuelling of these pumps in the project's Spill Prevention and Response Procedures.	Comply Addressed in the hydrotest Plan. RF regulations stipulate 25 meters water protection zone in which no refuelling is allowed.
3. The project sponsor shall file with the Secretary before construction a list identifying the location of all waterbodies proposed for use as a hydrostatic test water source or discharge location.	Comply with relevant RF regulations
C. INTAKE SOURCE AND RATE	
1. Screen the intake hose to prevent entrainment of fish.	Comply Will be addressed in the Hydrotest Plan.
2. Do not use state-designated exceptional value waters, waterbodies which provide habitat for federally listed threatened or endangered species, or waterbodies designated as public water supplies, unless appropriate Federal, state, and/or local permitting agencies grant written permission.	Comply Will be addressed in the Hydrotest Plan.
3. Maintain adequate flow rates to protect aquatic life, provide for all waterbody uses, and provide for downstream withdrawals of water by existing users.	Comply Will be addressed in the Hydrotest Plan.
4. Locate hydrostatic test manifolds outside wetlands and riparian areas to the maximum extent practicable.	Comply Will be addressed in the Hydrotest Plan.
D. DISCHARGE LOCATION, METHOD, AND RATE	
1. Regulate discharge rate, use energy dissipation device(s), and install sediment barriers, as necessary, to prevent erosion, streambed scour, suspension of sediments, or excessive streamflow.	Comply Will be addressed in the Hydrotest Plan.
2. Do not discharge into state-designated exceptional value waters, waterbodies which provide habitat for federally listed threatened or endangered species, or waterbodies designated as public water supplies, unless appropriate Federal, state, and local permitting agencies grant written permission.	Comply All discharges of untreated water to the ground surface away from surface waters. If antifreeze necessary in the winter, develop a plan before any hazardous materials are introduced to hydrotest activities.