

February 18, 2016

Ref. No.: 10-9075T04

Imperial Oil Limited
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Attention: Environmental Services

Re: Performance Verification Plan for
45 Station Hill Road
Lillooet, British Columbia
Location No.: 88000855/JW.00762

Further to your request, Parsons Canada Ltd. (Parsons) is pleased to provide this Performance Verification Plan (PVP) in support of an application for a risk-based Certificate of Compliance (CofC) for the property located at 45 Station Hill Road in Lillooet, British Columbia (the Seton Motors Property). The PVP presents the principal risk management measures that apply within the Management Area on the Seton Motors Property to ensure the CofC remains valid (i.e. the key risk management controls of Schedule B of the CofC which must remain in place within the Management Area on the Seton Motors Property). The PVP was prepared in accordance with British Columbia Ministry of Environment (BCMOE) Procedure 12: Procedures for preparing and issuing contaminated sites legal instruments (Procedure 12).

A plan indicating the areal extent of the the Management Area on the Seton Motors Property, relevant to this PVP, is indicated in Schedule A of the CofC.



PRINCIPAL RISK MANAGEMENT CONTROLS

A human health and ecological risk assessment (HHERA) was conducted for the Seton Motors Property, and the results presented in the Parsons reports, "Preliminary Site Investigation/Detailed Site Investigation/Confirmation of Remediation, 50 Station Hill Road, Lillooet, British Columbia (November 20, 2015)" and "Risk Assessment, 50 Station Hill Road, Lillooet, British Columbia (November 20, 2015)". The principal risk management measures on which the risk assessment were based, as presented in Schedule B of the CofC, are as follows:

- (a) No drinking water wells will be installed within the Management Area on the Seton Motors Property.

DETERMINATION OF PROCEDURE 12 REMEDIATION TYPE

Based on the risk management measures within the Management Area on the Seton Motors Property, (i.e. the use of institutional controls to mitigate/eliminate risks within the Management Area on the Seton Motors Property and lack of imminent risks in the event that controls were not implemented) the Remediation Type applicable within the Management Area on the Seton Motors Property is considered to be Type 2.

Under a Remediation Type 2 scenario, Procedure 12 indicates that a PVP is required, while an operations and maintenance plan may be required.

PERFORMANCE VERIFICATION PLAN

A PVP is required to ensure that the principal risk management measures upon which the risk assessment is based are met within the Management Area on the Seton Motors Property.

If requested by the Director, the responsible person(s) must provide a signed statement on whether the principle risk management controls outlined in (a) above are being met.

Performance verification actions for the Seton Motors Property include the following:

- (a) Communication with the Seton Motors Property owner that drinking water wells must not be constructed within the Management Area on the Seton Motors Property.

Imminent risks to drinking water receptors are not anticipated based on the following:

- the absence of drinking water wells at the Seton Motors Property and developments in the vicinity of the Seton Motors Property;
- the land use at the Seton Motors Property is commercial; and
- potable water within the District of Lillooet is obtained from intakes located along Town Creek, intakes located along Dickey Creek and five wells. The closest intake located along Town Creek is located approximately 650 m to the northwest (i.e. up-gradient) of the Seton Motors Property. The closest intake located along Dickey Creek is located approximately 4.5 km to the north of the Seton Motors Property. Two of the wells are located greater than approximately 550 m to the south (i.e. cross-gradient) of the Seton Motors Property; two of the wells are located greater than approximately 750 m to the southwest (i.e. cross-gradient) of the Seton Motors Property; and one of the wells is located greater than approximately 400 m to the north of the Seton Motors Property (i.e. cross-gradient). The Seton Motors Property and other properties on the west side of the Fraser River are supplied by municipal water and do not have water wells. To our knowledge, there are no plans to install water wells in the area of the Seton Motors Property.

As such, an advisory for the Management Area on the Seton Motors Property that drinking water wells must not be constructed within the Management Area on the Seton Motors Property is considered sufficient to meet this risk management measure. The listing of this risk management measure in Schedule B of the CofC meets this requirement.

In summary, it is our opinion that the advisories listed in Schedule B of the CofC are sufficient for the risk management measures required for the Seton Motors Property.

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We trust that the foregoing information is satisfactory for your present requirements. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

PARSONS CANADA LTD.

A handwritten signature in blue ink, appearing to read 'J.A. Bright', is written over the typed name.

J.A. Bright, P.Eng.

JAB/cer

LIMITATION OF LIABILITY, SCOPE OF REPORT AND THIRD PARTY RELIANCE

This report has been prepared and the work referred to in this report has been undertaken by Parsons for Imperial Oil Limited. It is intended for the sole and exclusive use of Imperial Oil Limited, its affiliated companies and partners and their respective agents, employees and advisors (collectively, "Imperial Oil"). Any use, reliance on or decision made by any person other than Imperial Oil based on this report is the sole responsibility of such other person. Imperial Oil and Parsons make no representation or warranty to any other person with regard to this report and the work referred to in this report and they accept no duty of care to any other person or any liability or responsibility whatsoever for any losses, expenses, damages, fines, penalties or other harm that may be suffered or incurred by any other person as a result of the use of, reliance on, any decision made or any action taken based on this report or the work referred to in this report.

The investigations undertaken by Parsons with respect to this report and any conclusions or recommendations made in this report reflect Parsons' judgment based on the site conditions observed at the time of the site inspection on the date(s) set out in this report and on information examined at the time of preparation of this report. This report has been prepared for specific application to this site and it is based, in part, upon visual observation of the site, subsurface investigation at discrete locations and depths, and specific analysis of specific chemical parameters and materials during a specific time interval, all as described in this report. Unless otherwise stated, the findings cannot be extended to previous or future site conditions, portions of the site which were unavailable for direct investigation, subsurface locations which were not investigated directly, or chemical parameters, materials or analysis which were not addressed. Substances other than those addressed by the investigation described in this report may exist within the site, substances addressed by this investigation may exist in areas of the site not investigated and concentrations of substances addressed which are different than those reported may exist in areas other than the locations from which samples were taken.

If site conditions or applicable standards change or if any additional information becomes available at a future date, modifications to the findings, conclusions and recommendations in this report may be necessary. Other than by Imperial Oil, copying or distribution of this report or use of or reliance on the information contained herein, in whole or in part, is not permitted without the express written permission of Parsons. Nothing in this report is intended to constitute or provide a legal opinion.

BRITISH COLUMBIA MINISTRY OF ENVIRONMENT'S RELIANCE

Notwithstanding the above, the British Columbia Ministry of Environment is permitted to rely on this report and the information contained herein to the extent necessary to confirm that Imperial Oil has met their statutory obligations with respect to the Performance Verification Plan.