



AUC

Alberta Utilities Commission

**ATCO Pipelines
ATCO Gas and Pipelines Ltd.
CU Inc.
Canadian Utilities Limited**

Disposition of Muskeg River Pipeline Assets

April 20, 2012

The Alberta Utilities Commission

Decision 2012-110: ATCO Pipelines, ATCO Gas and Pipelines Ltd., CU Inc.,

Canadian Utilities Limited

Disposition of Muskeg River Pipeline Assets

Application No. 1607867

Proceeding ID No. 1552

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Fifth Avenue Place, Fourth Floor, 425 First Street S.W.

Calgary, Alberta

T2P 3L8

Telephone: 403-592-8845

Fax: 403-592-4406

Web site: www.auc.ab.ca

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1 Introduction

1. ATCO Pipelines (AP), a division of ATCO Gas and Pipelines Limited (AGPL), filed an application (application) on behalf of AGPL, CU Inc. (CUI) and Canadian Utilities Limited (CU) to the Alberta Utilities Commission (AUC or Commission) on November 4, 2011. In its application, AP requested Commission approval to dispose of the Muskeg River Pipeline and related facilities (MRP assets), pursuant to Section 26(2)(d) of the *Gas Utilities Act*, RSA 2000, c. G-5.

2. The MRP assets consist of:

- (1) A pipeline approximately 116 kilometres long and 406 millimetres (16 inches) in diameter serving the natural gas needs of the Shell Canada Limited, Muskeg River Mine facilities and other facilities in the Fort McMurray area.
- (2) Related assets that provide natural gas transmission service to certain other shippers at other receipt and delivery points on the Muskeg River Pipeline. These include all meter stations and associated equipment, pipeline laterals and valves connecting the meter stations to the Muskeg River Pipeline and related land rights ([Appendix 2 – Listing of MRP Assets](#)).¹

3. AP stated that the purpose of the transaction is to transfer the MRP assets from AGPL, a regulated entity owned 100 per cent by CUI, to a new company (NewCo). NewCo would be a non-regulated entity owned 100 per cent by ATCO Energy Solutions Ltd. (AESL), a wholly-owned subsidiary of CU.

4. AGPL also applied for approval to transfer the MRP assets from a utility ownership structure that includes AGPL and CUI, to a non-utility ownership structure involving NewCo and CU. As a result, CUI would no longer directly or indirectly own these non-utility assets.

5. CUI and CU provided notice of the MRP assets transaction in accordance with the relevant sections of the *Gas Utilities Act* and *Public Utilities Act* RSA 2000, c. P-45 and regulations. On November 7, 2011, the Commission issued a notice of application which required interested parties to submit a statement of intent to participate (SIP) by November 22, 2011. SIPs were received from NOVA Gas Transmission Ltd., Shell Canada Limited, Consumers' Coalition of Alberta (CCA), and the Office of the Utilities Consumer Advocate (UCA).

¹ Exhibit 1, paragraph 5, page 1.

6. Both the CCA and UCA indicated that they would like the opportunity to ask information requests in addition to filing argument and reply argument. NOVA Gas Transmission Ltd. and Shell Canada Limited indicated that they intended to monitor the proceeding and reserved the right to participate if necessary.

7. In a November 29, 2011 letter, the Commission established the following written process schedule to address AP's application:

Process step	Due date
Information requests to applicant	December 15, 2011
Information responses from applicant	December 23, 2011
Argument	January 9, 2012
Reply argument	January 23, 2012

8. The Commission considers that the record for this proceeding closed on January 23, 2012.

9. In reaching the determinations contained within this decision, the Commission has considered all relevant materials comprising the record of this proceeding, including the evidence and argument provided by each party. Accordingly, references in this decision to specific parts of the record are intended to assist the reader in understanding the Commission's reasoning relating to a particular matter and should not be taken as an indication that the Commission did not consider all relevant portions of the record with respect to that matter.

2 Background

10. In 1999, AP entered into a long-term commercial agreement with Shell Canada Limited and other joint venture participants for natural gas transmission service to be provided by the Muskeg River Pipeline. The Muskeg River Pipeline provides natural gas transportation service to meet the natural gas needs of the Shell Muskeg River Mine facilities and other facilities in the Fort McMurray area. Service on the Muskeg River Pipeline commenced in June 2002.

11. In June 2002, AP advised in a letter to the Alberta Energy and Utilities Board (the EUB), the Commission's predecessor, that it planned to initiate operations under independent stand-alone long-term commercial agreements with Shell Canada Limited, Chevron Canada Limited, Western Oil Sands L.P. and ATCO Power Canada Ltd. (an affiliate of ATCO Pipelines) to provide gas transportation service on the Muskeg River Pipeline. AP stated that the arrangement between AP and the Shippers would have no impact on rates charged to ATCO's existing ratepayers.

12. In February 2003, AP filed its 2003-2004 General Rate Application (GRA) Phase I requesting EUB approval for its revenue requirement for the 2003 and 2004 test years. In order to facilitate the Phase I and Phase II GRAs for the North, AP segregated the Muskeg River Pipeline from the AP North revenue requirement.

13. In the 2003-2004 GRA Phase I decision, the EUB established a placeholder for the MRP assets pending final determination of the MRP assets in a separate proceeding.² AP's revised interim rates, effective March 1, 2004 in Decision [2004-023](#),³ and final rates, effective November 1, 2004 in Decision [2004-096](#)⁴ were based on revenue requirements that excluded the Muskeg River Pipeline.

14. In Decision [2005-128](#)⁵ the EUB determined that the Muskeg River Pipeline was not a rate regulated asset. The Muskeg River Pipeline was considered a non-utility affiliate subject to the Inter-Affiliate Code of Conduct (Code). The EUB wrote:

... The Board therefore directs AP to consider and treat the Muskeg River Pipeline as an "Affiliate" under the ATCO Code effective as of the date of this Decision and to take all necessary steps to ensure compliance with the ATCO Code on or before March 1, 2006. The Board directs AP to advise the Board and interested parties of the steps taken to achieve the structural separation of the MRP from the regulated utility business of AP and to otherwise comply with the ATCO Code, or to file an exemption application, on or before March 1, 2006.^{6 7}

15. The EUB subsequently extended the March 2006 deadline to May 31, 2006.

16. On May 31, 2006, AP applied to the EUB requesting the approval of various exemptions from the Code with respect to the Muskeg River Pipeline and its relationship to ATCO Pipelines South (AP South) and ATCO Pipelines North (AP North).

17. In Decision [2006-136](#)⁸ the EUB directed AP to establish a shared services policy between AP and the Muskeg River Pipeline by April 1, 2007. The EUB also approved numerous exemptions to the Code⁹ however exemption from Section 3.2.1 Accounting Separation was denied.

² Decision [2003-100](#): ATCO Pipelines 2003/2004 General Rate Application - Phase I, Application No. 1292783, December 2, 2003, page 169.

³ Decision [2003-023](#): ATCO Pipelines 2003/2004 General Rate Application, 2004 Interim Rates Application, Application No. 1333099, May 9, 2004.

⁴ Decision [2004-096](#): ATCO Pipelines 2004 General Rate Application Phase II, Compliance Filing, Application No. 1363222, October 29, 2004.

⁵ Decision [2005-128](#): ATCO Pipelines Muskeg River Pipeline Application, Application No. 1393613, November 29, 2005.

⁶ Decision [2005-128](#), page 7.

⁷ In Decision [2005-128](#), the EUB determined that the MRP should be treated as an "Affiliate" for the purpose of the ATCO Group Inter-Affiliate Code of Conduct approved in Decision [2003-040](#): ATCO Group, Affiliate Transactions and Code of Conduct Proceeding, Part B: Code of Conduct, Application No. 1237673, May 22, 2003 (the Code).

⁸ Decision [2006-136](#) ATCO Pipelines, Muskeg River Pipeline Affiliate Code of Conduct Exemptions, Application No. 1463440, December 29, 2006.

⁹ Section 3.2.3 Separation of Information Services, Section 3.3.1 Sharing of Employees, Section 3.3.2 Transferring of Employees, Section 3.3.5 Services Agreement, and sections 3.3.6/3.3.7 Occasional Services Permitted and Emergency Services Permitted, Section 6.3 No Release of Confidential Information, sections 7.5/7.6 Requirement to file Code Compliance Plan and Compliance Report of the ATCO Group Inter-Affiliate Code of Conduct with respect to the Muskeg River Pipeline and its relationship to ATCO Pipelines North and ATCO Pipelines South.

18. In that same decision, the EUB granted exemptions to AP from Section 7.5 for compliance plans and Section 7.6 for compliance reports under the Code. A separate plan and report for the Muskeg River Pipeline was not required and one compliance report for AP could be filed. AP was directed to include all approved exemptions when filing its annual compliance report under Section 7.6(1) of the Code.

19. In Order U2007-147,¹⁰ the EUB approved the compliance filing to Decision 2006-136 and directed AP to revise its language in one of its statement in AP's Inter-Affiliate Code of Conduct Acknowledgement Forms.¹¹

3 Issues

3.1 Disposition of Muskeg River Pipeline assets

20. AP has requested Commission approval for the disposition of the MRP assets pursuant to Section 26(2)(d) of the *Gas Utilities Act*. AP indicated that the MRP assets are non-utility assets that were never used or required to be used for utility service and that accordingly, there can be no adverse impact to ratepayers as a result of the MRP assets transfer. AP is also seeking approval to transfer ownership of the MRP assets out of the CUI corporate structure.

21. No party disputed that Section 26(2)(d) of the *Gas Utilities Act* applies to the contemplated disposition of the MRP assets or that the proposed disposition is outside the ordinary course of business requiring the prior consent of the Commission.

Commission findings

22. When assessing an application for the disposition of assets under Section 26(2)(d) of the *Gas Utilities Act*, the Commission must consider whether the applicant has satisfied the “no harm test” traditionally applied by the Commission to an application for approval of a transfer of assets outside the ordinary course of business. Section 26(2)(d) states:

26(2) No owner of a gas utility designated under subsection (1) shall

...

(d) without the approval of the Commission,

(i) sell, lease, mortgage or otherwise dispose of or encumber its property, franchises, privileges or rights, or any part of it or them, or

¹⁰ Order U2007-147: ATCO Pipelines, Compliance Filing to Decision 2006-136, Inter-Affiliate Code of Conduct Exemptions and Muskeg River Pipeline, Application No. 1508308, June 1, 2007.

¹¹ Alberta Energy and Utilities Board, Compliance Filing Order U2007-147, ATCO Pipelines Compliance Filing to Decision 2006-136 Inter-Affiliate Code of Conduct Exemptions and Muskeg River Pipeline, Application No. 1508308, June 1, 2007. The change to the Inter-Affiliate Code of Conduct Acknowledgement Form was as follows: “I am not aware of any non-compliance with the provisions of the Code and related Compliance Plan with respect to any interaction between the Utility and an affiliate (including the Muskeg River Pipeline, a non-utility affiliate of ATCO Pipelines utility operations).”

- (ii) merge or consolidate its property, franchises, privileges or rights, or any part of it or them,

and a sale, lease, mortgage, disposition, encumbrance, merger or consolidation made in contravention of this clause is void, but nothing in this clause shall be construed to prevent in any way the sale, lease, mortgage, disposition, encumbrance, merger or consolidation of any of the property of an owner of a gas utility designated under subsection (1) in the ordinary course of the owner's business.

23. The Commission and its predecessor the EUB have traditionally applied a “no harm test” in assessing an application for the disposition of utility property under Section 26(2)(d) of the *Gas Utilities Act* or the comparable section of the *Public Utilities Act*, Section 102(2)(d). The no harm test considers the proposed transaction in the context of other potential financial impacts and service level impacts to customers. The test, which has been reviewed in several EUB and Commission decisions,¹² was summarized in Decision 2000-41¹³ where the EUB stated:

The Supreme Court of Canada has stated that the Board's jurisdiction to “safeguard the public interest in the nature and quality of the service provided to the community by public utilities” is “of the widest proportions.” The Board has also noted that its governing legislation provides no specific guidance for the exercise of the Board's direction in approving an asset disposition by a designated owner of a public utility.

The Board has held that its discretion under essentially similar provisions of the GU Act must be exercised according a “no-harm” standard. More specifically, the Board has held that it must be satisfied that customers of the utility will experience no adverse impact as a result of the reviewable transaction.

...

The Board believes that its duty to ensure the provision of safe and reliable service at just and reasonable rates informs its authority to approve an assets disposition by a public utility pursuant to Section 91.1(2) of the PUB Act. Therefore, the Board is of the view that, subject to those issues which can be dealt with in future regulatory proceedings ..., it must consider whether the disposition will adversely impact the rates customers would otherwise pay and whether it will disrupt safe and reliable service to customers. As already noted, the Board also accepts that it must assess potential impacts on customers in light of the policy reflected in the EU Act, namely the unbundling of the generation, transmission and distribution components of electric utility service and the development of competitive markets and customer choice. As a result, rather than simply asking whether customers will be adversely impacted by some aspect of the transactions, the Board concludes that it should weight the potential positive and negative impacts of the transactions to determine whether the balance favours customers or at least leaves them no worse off, having regard to all of the circumstances of the case. If so, then the Board considers that the transactions should be approved.¹⁴ (footnotes omitted)

¹² The no harm test used by the Commission was referred to by the Supreme Court of Canada in *ATCO Gas & Pipelines Ltd. v. Alberta (Energy & Utilities Board)*, 2006 SCC 4, [2006] 1 S.C. R 140, (Stores Block decision).

¹³ Decision 2000-41: TransAlta Utilities Corporation Sale of Distribution Assets, Application No. 2000051, File No. 6404-3, July 5, 2000.

¹⁴ *Ibid.*, pages 7 and 8.

24. In the present case, the disposition of the Muskeg River Pipeline assets must be reviewed in light of Section 26(2)(d) of the *Gas Utilities Act* and the no harm test.

25. In Decision 2005-128, the EUB addressed whether the Muskeg River Pipeline assets were considered regulated assets. The EUB found that the Muskeg River Pipeline has never been rate regulated, that the Muskeg River Pipeline assets have never been included in rate base, and that rate regulated customers of AP have not directly incurred costs related to the project.¹⁵ The EUB discussed the Muskeg River Pipeline being moved into a separate legal entity as follows:

With respect to existing material assets already owned by a utility that have never been included in rate base like the MRP, or assets which at some point in time are removed from rate base, the preference of the Board would be that these assets also be moved into a separate legal entity. The Board recognizes, however, that in the case of existing non-rate base assets, or assets that are removed from rate base, there may be mitigating circumstances (such as tax consequences for example) that could make it overly burdensome to transfer such assets to a separate legal entity.¹⁶

26. In applying the no harm test to the proposed disposition, the Commission must consider whether the assets subject to disposition under Section 26(2)(d) are used or required to be used for utility service under Section 37 of the *Gas Utilities Act*. Section 37 of the *Gas Utilities Act* requires the Commission, in fixing just and reasonable rates to “determine a rate base for the property of the owner of the gas utility used or required to be used to provide service to the public within Alberta.” The Commission finds that the disposition of the Muskeg River Pipeline assets from AGPL to a non-regulated entity NewCo as proposed in the application, is consistent with the EUB’s previously stated preference in Decision 2005-128 that non-rate base assets be held by a separate legal entity and the EUB’s determination that the rate regulated customers have not directly incurred costs related to the Muskeg River Pipeline.

27. The Commission also accepts the applicants’ confirmation that the costs of salvage, disposal, site remediation and environmental liabilities, and income tax liabilities for the Muskeg River Pipeline assets continue to be borne by shareholders.¹⁷ The Commission concludes that the no harm test has been satisfied in relation to the disposition of the Muskeg River Pipeline assets, because these assets are not used, or required to be used, for regulated service. Hence the disposition of the Muskeg River Pipeline assets to NewCo is approved.

3.2 Inter-affiliate transactions and the service agreement with NewCo

28. AP did not comment on the inter-affiliate transactions as a result of the disposition of the Muskeg River Pipeline assets.

29. In information responses, AP specified that it did not expect to receive services from NewCo. AP would provide services to NewCo similar to the functions it performs presently such as: pipeline operations and maintenance, station operations and maintenance, pipeline system control and monitoring and administration and overhead. AP expects the transfer of the MRP

¹⁵ Decision 2005-128, page 4.

¹⁶ Decision 2005-128, page 6.

¹⁷ Exhibit 18.01, UCA-AP-3(g).

assets to NewCo to occur within 60 days following a positive decision on this application. AP is in the process of creating a service agreement for these services and expects all services to comply with the Code.¹⁸ The forecast costs and revenues for services provided by AP for 2012 and 2013 could not be provided because the service agreement with NewCo has not been finalized.¹⁹ AP asserted that NewCo would be governed by the Code²⁰ and that exemptions from the Code with respect to MRP assets would no longer be necessary once the transfer to NewCo is complete.

30. AP further indicated that there would be no significant cost impact to AP's revenue requirement because costs associated with AP providing services will be recovered in accordance with current cost recovery practice.²¹

31. Interveners raised concerns with respect to the future affiliate transactions between AP and Newco, the underlying services agreement, and whether all transactions would comply with ATCO Group's Code.

32. While the CCA did not object to the transfer of Muskeg River Pipeline assets, it is concerned with the direct and indirect cost allocations from regulated operations to non-regulated operations. The CCA recommended that AP be directed to file the proposed service agreement within 30 days of this decision in order that the costs assigned and allocated to the assets may be examined.²² The UCA supported the CCA's position.²³

33. Although the UCA did not object to the disposition of the Muskeg River Pipeline assets, it is concerned with the creation of new affiliate relationships, and the limited ability to test costs and revenues related to affiliate relationships. The UCA also considered that this new affiliate relationship should be explicitly subject to any requirements or tests that may be required under any new AUC rules governing affiliate relationships.²⁴

34. AP reiterated that no parties opposed the application, that NewCo would be governed by the ATCO Group Code, and that any changes to the Code would therefore be included. With respect to the interveners' request for the service agreement, AP indicated that the agreement would be similar to other service agreements AP enters into with affiliated companies. AP considered that the proper and normal place to conduct any required review of such service agreements was in the course of AP's revenue requirement proceedings and not through a stand-alone proceeding.²⁵

¹⁸ Exhibit 16.01, AUC-AP-1(c).

¹⁹ Exhibit 18.01, UCA-AP-3(f).

²⁰ Exhibit 16.01, AUC-AP-1(b).

²¹ Exhibit 16.01, AUC-AP-1(c).

²² Exhibit 19.01, CCA argument, page 1.

²³ Exhibit 22.02, UCA reply argument, page 2.

²⁴ Exhibit 20.02, UCA argument, page 2.

²⁵ Exhibit 24.01, AP reply argument.

Commission findings

35. While no parties objected to the disposition of the Muskeg River Pipeline assets, interveners did express concerns with the cost allocations,²⁶ with the creation of new affiliate relationships, and with the limited ability to test costs and revenues related to affiliate relationships.²⁷

36. In Decision 2005-128, the EUB directed AP to treat the Muskeg River Pipeline as an affiliate under the Code effective November 29, 2005, and to take all necessary steps to ensure compliance with the Code.²⁸

37. In its application, AP submitted that the new affiliate transaction will comply with the Code and there will be no significant cost impact to AP's revenue requirement regarding the disposition of the Muskeg River Pipeline assets.²⁹ The nature of the affiliate relationship is unclear to the Commission because no agreement is provided. The Commission also lacks information to determine whether there will be a cost impact to the revenue requirement after the disposition is completed.

38. AP has acknowledged that after the transfer of the Muskeg River Pipeline assets is completed it will provide services such as pipeline operations and maintenance, station operations and maintenance, pipeline system control and monitoring, and administration and overhead.

39. In light of the evidence on the record, the Commission is unable to conduct a detailed assessment of services between AP and NewCo, the underlying costs, or the acceptability of the related service agreement. However, the Commission agrees with AP that this new affiliate transaction will be subject to the Code, and is best reviewed within a revenue requirement proceeding.

40. Based on the above, the Commission directs AP in its final 2012 revenue requirement application to:

- file the service agreement between AP and NewCo
- provide a detailed explanation of all services being provided by AP to NewCo
- provide the cost associated with each service
- explain the underlying costing methodology or allocation
- explain the cost recovery mechanism and any direct or indirect impacts to AP's utility regulated revenue requirement
- confirm that the affiliate transactions listed comply with ATCO Group's Inter-Affiliate Code of Conduct

²⁶ Exhibit 19.01, CCA argument, page 1.

²⁷ Exhibit 20.02, UCA argument.

²⁸ Decision 2005-128, page 7.

²⁹ Exhibit 16, AP IR responses to AUC-AP-1(c).

41. AP is also directed to explain any differences between the services and costs it provided to the Muskeg River Pipeline in the previous agreement, to those in the new service agreement with NewCo.

4 Order

42. It is hereby ordered that:

- (1) The disposition of the Muskeg River Pipeline assets to NewCo is approved.
- (2) AP is directed to provide the Commission with the information regarding inter-affiliate transactions between AP and NewCo in its 2012 final revenue requirement filing, as detailed in paragraphs 40 and 41.

Dated on April 20, 2012.

The Alberta Utilities Commission

(original signed by)

Anne Michaud
Commission Member

Appendix 1 – Proceeding participants

Name of organization (abbreviation) counsel or representative
ATCO Pipelines (AP) N. Gretener J. Burnett B. Jones S. J. Mah
Consumers' Coalition of Alberta (CCA) J. A. Wachowich J. A. Jodoin
NOVA Gas Transmission Ltd. T. Bews C. Shaw
Office of the Utilities Consumer Advocate (UCA) T. Marriott R. Daw
Shell Canada Limited M. Zacaruk

The Alberta Utilities Commission Commission Panel A. Michaud, Commission Member Commission Staff A. Sabo, (Commission counsel) A. Laroia S. McCrady M. McJannet
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Appendix 2 – Listing of MRP assets

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Appendix 2 - Listing
of MRP Assets

(consists of 1 page)

Appendix 3 – Summary of Commission directions

This section is provided for the convenience of readers. In the event of any difference between the directions in this section and those in the main body of the decision, the wording in the main body of the decision shall prevail.

1. Based on the above, the Commission directs AP in its final 2012 revenue requirement application to:
 - file the service agreement between AP and NewCo
 - provide a detailed explanation of all services being provided by AP to NewCo
 - provide the cost associated with each service
 - explain the underlying costing methodology or allocation
 - explain the cost recovery mechanism and any direct or indirect impacts to AP’s utility regulated revenue requirement
 - confirm that the affiliate transactions listed comply with ATCO Group’s Inter-Affiliate Code of Conduct Paragraph 40

2. AP is also directed to explain any differences between the services and costs it provided to the Muskeg River Pipeline in the previous agreement, to those in the new service agreement with NewCo. Paragraph 41

ATCO Gas and Pipelines Ltd., CU Inc. and Canadian Utilities Limited
Application to Dispose of Muskeg River Pipeline Assets

Attachment 1

Listing of MRP Assets

Muskeg River Pipeline Facilities

- 116 km 406 mm pipeline running from an interconnect with the NOVA Gas Transmission Ltd. system to the Shell Canada Ltd. Muskeg River Mine in the Fort McMurray area of Alberta
- Aurora Control Station tied into MRP emergency interconnect (SCADA/Telemetry, pressure control, meter, Thermo Electric Generator [TEG])
- Muskeg River Co Gen Delivery Station (meter, separator, slug knock out, liquid storage, SCADA/Telemetry, pressure control, gas chromatograph, water analyzer)

Ells River Receipt Station

- 2.4 km 114 mm pipeline
- 114 mm receipt station (meter, SCADA/Telemetry and separator)
- Tie-in to MRP (piggable fitting and underground valve)

Dunkirk River Receipt Station

- 5 km 168mm pipeline
- 168 mm receipt station (meter, SCADA/Telemetry, separator, process control, 2 TEGs)

Joslyn Creek Delivery Station

- 114 mm delivery station (meter, gas sampler, SCADA/Telemetry, separator, liquids storage tank, helipad, remote site emergency shut down, 1 TEG)
- Tie-in to MRP (12" tap and valve assembly)

Horizon Delivery Station

- 114 mm delivery station (meter, odorization, pressure control, SCADA/Telemetry, separator)
- 3.1 km of 168 mm X 4.0 mm Grade 359 pipe
- 2.5 km of 168 mm X 4.8 mm Grade 359 pipe
- 10.5 km of 114 mm X 4.8 mm Grade 359 pipe