



AUC

Alberta Utilities Commission

ATCO Gas and Pipelines Ltd. (South)

Pipeline Removal

Township 48, Range 28, West of the Fifth Meridian

September 26, 2012

The Alberta Utilities Commission

Decision 2012-257: ATCO Gas and Pipelines Ltd. (South)

Pipeline Removal

Township 48, Range 28 West of the Fifth Meridian

Application No. 1608819

Proceeding ID No. 2129

September 26, 2012

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The Alberta Utilities Commission

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1 Introduction

1. ATCO Gas and Pipelines Ltd. (South) (ATCO) filed an application with the Alberta Utilities Commission (AUC or the Commission) seeking approval for an amendment/addition to Permit and Licence No. 625 pursuant to Section 11 of the *Pipeline Act* and Section 4.1 of the *Gas Utilities Act* for the removal of lines 33 and 77.

(the project)

2. This application was registered as Application No. 1608819 on September 13, 2012.

3. ATCO stated that the subject lines were previously abandoned in 2005 and are located in the bank of Jasper Lake in Jasper National Park. Parts of this abandoned pipeline segment have become exposed due to erosive attack of the Athabasca River channel and wind erosion on the banks of the Jasper Lake sand dunes. The exposed section of this abandoned pipe is a potential safety hazard to park users and diminishes the aesthetics of the rocky mountain national park character. In the fall of 2010, some portions were removed and this project is to remove the remaining segments within the Jasper Lake sand dunes area.

4. ATCO Pipelines proposes to remove approximately 1.7 kilometres of abandoned 114 millimetre steel pipeline, consisting of both line numbers 77 and 33, in their entirety. A portion of line number 77 is already exposed due to the aforementioned erosion, and line number 33 would be removed as a precaution and at the request of Parks Canada. Assessment indicates that in the area of the current exposed pipeline (approximately 110 metres), the river channel will continue to erode the sand dunes, thereby exposing additional abandoned pipeline.

5. ATCO stated that prior to pipe removal activities the inside of the pipe would be checked and cleaned of any fluids. The common cleaning practice is to use an inline cleaning tool. A stiff rubber scraping tool (blade and brush) would be pushed through the abandoned pipeline using an appropriate medium such as air, nitrogen, or similar inert gas, to control any identified potential safety hazard. Any free liquids and/or sludge pushed ahead of the pig would be collected in an appropriate containment tank for proper disposal as specified by the Energy Resources Conservation Board Directive 058: *Oilfield Waste Management Requirements for the Upstream Petroleum Industry*. This process would be repeated until free liquids are no longer evident by visual inspection. To further ensure that any residual contents from inside the pipe are not released into the environment, the pipe ends of each short segment of pipe being removed would be capped or plugged.

6. ATCO stated that the existing buried pipe would be removed from the ground by pulling out short sections, approximately 50-metre lengths, between spot excavations (bell-holes) instead of the open ditch removal method. The salvaged pipe would be cut into specified lengths,

bundled, and air lifted from site with the aid of a helicopter to a nearby staging area before being loaded onto trucks for transport to a metal recycler outside the park.

7. ATCO stated that the project is located on federal land within Jasper National Park managed by Parks Canada. The environmental ecosite (Jasper lake sand dunes) impacted by this work is highly sensitive and of a rare nature. ATCO emphasized that the key mitigation conservation measure was to minimize disturbance to the sensitive vegetation and landforms. In the sand dunes, ATCO committed to restricting access, use of tracked equipment only, and placing mats over sensitive vegetation prior to construction. ATCO further committed to salvaging surface material at all excavations and air lifting the salvaged pipe to avoid vehicle travel through the sand dunes. Reclamation of disturbed sites was proposed to restore all original contours and drainage patterns. Both short and long term erosion control using erosion control blankets and prompt re-seeding with native seed mix were proposed due to the severe wind erosion on active sand dunes. The application described rare plant and plant community surveys as well as wildlife surveys conducted to help minimize potential impacts of the proposed project. The specific environmental protection and measures related to this project are detailed in the Environment Assessment Report, May 2012,¹ which was submitted with the application and has been accepted by Parks Canada.

8. ATCO stated that conservation and reclamation of the disturbed right-of-way and access for this project is consistent with the guidelines specified in Jasper National Park's Best Available Methods for Common Leaseholders. The key mitigation conservation measure is minimal disturbance to the sensitive vegetation and landform of the sand dunes including restricted access, workspace and brush clearing, use of tracked equipment only, placing mats over sensitive vegetation, salvaging the upper 15-20 centimetres of surface material at all excavation locations, and air lifting the salvaged pipe from the site to avoid vehicle travel through the sand dunes.

9. ATCO stated that reclamation of the disturbed sites would include restoring all original contours and drainage patterns during final clean-up. Implementing and maintaining both short-term and long-term erosion control due to the severe wind erosion of the active sand dunes will involve the placement of erosion control blankets and re-seeding with native seed as specified in Figure 2 of the environmental assessment report.²

10. In its submission, ATCO stated that the requirements of the consultation and notification program were met and that no outstanding objections or concerns remain in regards to the application.

2 Findings

11. The Commission considered ATCO's submission that a participant involvement program has been conducted and that there are no outstanding public or industry objections or concerns.

12. The Commission has reviewed the application and has determined that it meets the requirements as stipulated in AUC Rule 020: *Rules Respecting Gas Utility Pipelines*.

¹ Exhibit. 0005.00.ATCO-2129 – Environmental Assessment.

² Exhibit. 0005.00.ATCO-2129 – Environmental Assessment.

13. The Commission considered the environmental surveys conducted to date and ATCO's commitments for environmental protection and minimal disturbance of sensitive areas during project implementation. The Commission finds that with rigorous implementation of the environmental mitigation and reclamation measures specified in the application, the potential environmental effects of the proposed project will be satisfactorily managed.

14. Due to the nature of the application, a notice of application was not issued and, therefore, a hearing was not required as the Commission considered that its decision or order would not directly and adversely affect the rights of a person pursuant to Section 9 of the *Alberta Utilities Commission Act*.

15. The Commission finds that the project is required to eliminate a potential safety hazard in Jasper National Park.

16. Based on the foregoing, the Commission considers the project to be in the public interest in accordance with Section 17 of the *Alberta Utilities Commission Act*.

3 Decision

17. Pursuant to Section 11 of the *Pipeline Act* and Section 4.1 of the *Gas Utilities Act*, the Commission approves the amendment to Permit and Licence No. 625 and grants ATCO the amended permit and licence as set out in Appendix 1 – Gas Utility Pipeline – Pipeline Removal – Permit and Licence No. 625 – September 26, 2012 (Appendix 1 will be distributed separately).

Dated on September 26, 2012.

The Alberta Utilities Commission



Neil Jamieson
Commission Member