Westcoast Energy Inc. (Westcoast)
Application for the Pointed Mountain Pipeline Abandonment Project (Project)
Subsection 241(1) of the Canadian Energy Regulator Act (Application)
File OF-Fac-Gas-W102-2022-01 01
File 3426221
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Westcoast Response to Canada Energy Regulator (CER)
Information Request (IR) No. 5

5.1 Removal of Test Lead Posts

Reference:

i) Westcoast Energy Inc. (Westcoast), Response to Information Request (**IR**) No. 3.12, Test Lead Posts, Pages 29 to 31 of 48, C28096-2

ii) Westcoast, Response to IR No. 3.13, Environmental disturbance from Test Lead Posts, Pages 32 to 35 of 48, C28096-2

iii) Canadian Standards Association (**CSA**) Z662-19, Clause 10.16.3 Removal of related surface equipment

iv) CSA Z662-19, Clause 9.9.1 and Clause 9.9.2 Operation and maintenance of impressed current and sacrificial cathodic protection systems

Preamble:

Reference i) provides an updated version of Table 2.2 from the Application that identifies six test lead posts proposed to be left in place during the abandonment of the project.

Reference ii) states that if accessing the six remaining test lead posts by foot, crews would be required to walk through several kilometres of deep snow, which presents safety risks. Test lead posts may be buried under snow and difficult to locate. Successfully excavating the test lead posts through hand-digging in frozen ground conditions will be challenging. If accessing the test lead posts, additional mulching and icing along more than 10 km of the right-of-way (**RoW**) to a width of approximately 10 m would need to be completed. Several wetlands and watercourses would need to be crossed in the process. Assuming that the test lead posts can then be located (i.e., not covered with thick vegetation and / or deep snow), additional clearing would be required to create safe working spaces for an excavator to completely remove each test lead post.

Reference iii) states that a buried pipeline that has been abandoned in place shall have related surface equipment removed to pipeline depth, except where surface equipment is within an existing surface facility that is in continuing operation or deactivated. Pipeline signage may be left in place where deemed appropriate. Examples of such equipment are pipeline risers, liner vent piping, casing vents, underground valve vaults or valve

extenders, inspection bell holes, and cathodic protection rectifiers, test posts or anode wiring.

Reference iii) also states that the requirements of this standard are considered to be adequate under conditions normally encountered in the oil and natural gas industry. Specific requirements for abnormal or unusual conditions are not prescribed, nor are all details related to engineering and construction prescribed. It is intended that all work performed within the scope of this standard meet the standards of safety and integrity expressed or implied herein, and that the requirements of this standard be applied with due regard to the protection of the environment, which includes land, water, plant life, and animal life. Detailed requirements concerning the protection of the environment are not prescribed.

Clause 9.9.1 in reference iv) states that “At regular intervals, operating companies shall verify the satisfactory operation of their cathodic protection systems. CGA OCC-1, Section 4, shall be considered for monitoring and frequency guidelines.” Clause 9.9.2 states that “Operating companies shall establish, by means of surveys, that their cathodically protected pipeline systems meet the criteria selected for cathodic protection. Such a satisfactory state of cathodic protection shall be verified at regular intervals and the operating company shall take remedial action to correct any deficiencies found in such surveys.”

The Commission notes that Clause 10.16.3 of CSA Z662-19 requires the removal of all related surface equipment and leaving surface equipment in place is by exception.

The Commission requires additional information to determine whether all options for removal of the test lead posts have been considered, not only in winter, and if the proposal for leaving the test lead posts in place is sufficiently justified. The answers may help inform potential conditions.

Request: Provide the following:

a) a discussion of how the six test lead posts were previously accessed along the RoW for regular monitoring and maintenance and why current conditions no longer permit access to the test lead posts;

b) a discussion for both winter and summer removal scenarios of the six test lead posts which include the following considerations:

   i. safety risks;

   ii. engineering risks; and

   iii. environmental risks;

c) maps showing environmental features both at test lead post locations and along the required access to the test lead post locations; and

d) an environmental assessment of potential effects of test lead post removal (including areas required for access) and potential long-term effects that may result from the test lead posts remaining in place.

Response: a) Test lead post (TLP) monitoring was principally completed through aerial patrols.

Maintenance of TLPs was not frequently required and occurred via helicopter flights or the use of all-terrain vehicles. Periodic brushing of the right-of-way enabled access prior to deactivation. Since deactivation in 2016, natural recovery of vegetation in the right-of-way has reduced the number of safe landing options for helicopter flights, and made all-terrain vehicle use more difficult. As noted in Reference ii) and below, access by foot presents safety risks and hand-digging will be challenging. To avoid these safety risks access requirements for mechanical removal (moving an excavator to each TLP site) would be different than the access needed for maintenance of the TLP.

b) Although Westcoast initially proposed removing the six TLP, as planning of the Project has progressed Westcoast identified safety and environmental risks that prompted Westcoast to propose leaving the six TLP in place.

i. The safety risks associated with both winter and summer removal scenarios include:

- Use of brushing equipment and chainsaws may result in injury.
- In the event of an emergency, response time may be increased due to thick brush.
- If accessing the TLPs by foot, crews would be required to walk several kilometers which presents safety risks due to fatigue and isolation.
- To remove TLPs, excavation using hand tools may be required. The use of hand tools increases the risk of injury.

The safety risks associated with summer removal include:

- Wildlife, particularly bears, are more active and territorial in summer.
- Waterbodies and wetlands can be hazardous to cross.
- Heat stress and stroke.
- Insects, including ticks, are active during summer seasons.

The safety risks associated with winter removal include:

- Exposure to cold temperatures can result in frost nip, bite or hypothermia.
- Blizzards and snowfall can reduce visibility, isolate workers or result in disorientation.
- Steep slopes may be slippery requiring large equipment to be winched.

ii. There are no additional engineering risks.

iii. Whether removing the TLP in winter or summer, additional brushing will be required. There is risk that even after brushing, it may not be possible to locate the TLP, especially if foot access and hand excavation is required. This risk is particularly true in winter, as the TLPs may be buried by snow. Accessing the TLPs will also require additional watercourse and wetland crossings which increases the risk of aquatic impacts.

Finally, the additional brushing is not in line with the goal of minimization of land disturbance, which has continually been identified as a high priority for the local First Nations.

c) Maps showing the environmental features are attached as follows:

- Attachment 1 - Figure 1 - an overview of the six TLP.
- Attachment 2 - Figure 2-1 – an overview of the environmental features for watercourse crossings and wetlands related to sites AGM#2L and AGM#3L.
- Attachment 3 - Figure 2-2 – an overview of the environmental features for watercourse crossings and wetlands related to sites AGM#11L, AGM#12L, AGM#13R, and AGM#15R.

Note that AGM stands for above ground marker and in this case the above ground markers are TLP.

d) Attachment 1 - Table 1 summarizes the potential effects, residual effects, and cumulative effects as applicable for environmental valued components. The significance ratings for the removal of TLP have not changed from the Environmental and Socio-economic Assessment (“ESA”, C17537-5) or Supplemental Environmental and Socio-economic Assessment (“Supplemental ESA”, C26476-8). While considering there may be an increase in required Project activities for TLP removal such as brushing vegetation, excavation and equipment use (varies with summer or winter access), these increases do not change the characterization of residual effects based on the ESA criteria (see Section 4 of the ESA).