

Bulletin 2017-09

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Reporting Non-Emergency Releases from Pipeline Horizontal Directional Drilling

This bulletin announces a new method for reporting non-emergency, or low-impact, surface releases from horizontal directional drilling (HDD) for pipeline construction and clarifies when subsurface HDD releases must be reported to the Alberta Energy Regulator (AER).

The requirement to report HDD releases has not changed; companies continue to be responsible to report both emergency and non-emergency releases resulting from HDD activities.

Background

HDD is a method of pipeline construction that is increasingly being used. In 2016, of the total reported releases of drilling fluid related to this method of pipeline construction, roughly half were considered low impact because the drilling fluids used did not contain materials that could cause an adverse effect. These non-emergency releases were reported in the same manner as emergency releases—by calling the AER's Energy/Environmental Emergency & Operational Complaint Number. The new method of reporting non-emergency releases, introduced below, will improve the effectiveness of the emergency number by reducing the number of calls received regarding low-impact releases.

Reporting of Surface HDD Release

The AER has created the form Release Report: Surface Release During HDD for Pipeline Construction. Effective immediately, companies are to use this form to report non-emergency surface releases from HDD for pipeline construction.

All information requirements remain the same as before.

Non-emergency events are to be reported on a monthly basis using this new form, which is available on the AER website, www.aer.ca, under Forms > [Miscellaneous Forms](#). The spreadsheet form is to be submitted to the AER field centre or regional office within whose boundaries the release or releases occurred by the fifth day of the following month (e.g., January releases are to be reported by February 5). A [map of the field centre and regional office boundaries](#) is available on the AER website under About AER > Contact Us > Regional Maps & Contact Us.

The AER considers an HDD surface release to be a non-emergency if it meets all of the following criteria:

- there are no potential adverse impacts;
- release volume is less than two cubic metres;
- release is greater than 50 metres from a water body;
- the drilling fluid consists of bentonite, fresh water, and non-toxic additives, products, or chemicals;
- release is contained on the right-of-way and any affected parties (e.g., landowner, grazing lease holder, etc.) have been notified;
- all of the drilling fluid additives, products, or chemicals have guidelines listed in *Alberta Tier 1* or *Alberta Tier 2 Soil and Groundwater Remediation Guidelines* or *Canadian Environmental Quality Guidelines* and do not exceed those guidelines; and
- released material will be cleaned up completely.

If any of the above criteria are not met, the company must immediately report the incident to the AER via the emergency number (1-800-222-6514).

Reporting of Subsurface HDD release

These releases are typically considered low risk because the mud systems do not contain materials that may cause an adverse effect. These events must be recorded by industry and the records retained with the pipeline construction file.

However, if any of the following criteria are met, the subsurface release must be immediately reported to the AER via the emergency number:

- the drilling fluid is not freshwater based;
- there are additives, products, or chemicals that will exceed criteria listed in *Alberta Tier 1* or *Alberta Tier 2 Soil and Groundwater Remediation Guidelines* or *Canadian Environmental Quality Guidelines*;
- there are additives, products, or chemicals that do not have guidelines listed in *Alberta Tier 1* or *Alberta Tier 2 Soil and Groundwater Remediation Guidelines* or *Canadian Environmental Quality Guidelines*; or
- there are suspected impacts to a domestic-use water well.

The above processes for HDD releases are in accordance with *Informational Letter 98-1: A Memorandum of Understanding Between Alberta Environmental Protection and the Alberta Energy and Utilities Board Regarding Coordination of Release Notification Requirements and Subsequent Regulatory Response (IL 98-1)*, section 1.2(3) of the *Pipeline Rules*, and *Directive 050: Drilling Waste Management*.

For questions about this bulletin, contact the AER's Customer Contact Centre at 1-855-297-8311.

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