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Filed Electronically

Canada Energy Regulator
Suite 210, 517 Tenth Avenue SW
Calgary, Alberta T2R 0A8

Attention: Ramona Sladic, Secretary of the Commission

Dear Ramona Sladic:

**Re: NOVA Gas Transmission Ltd. (NGTL)
2021 Meter Stations and Laterals Abandonment Program (2021 Abandonment Program)
Order ZO-006-2023 (Order)
Program Update and Variance Application Pursuant to Section 69 of the *Canadian Energy Board Act* (CER Act) - Changes in Abandonment Scope and Methodology at the Countess West Receipt Meter Station (Countess West RMS) and NPS 8 Cessford East Lateral
File No.: OF-Fac-Gas-N081-2022-05 01**

On March 30, 2023, the Commission of the Canada Energy Regulator (Commission) issued the Order approving the 2021 Abandonment Program including its proposed scope and methodology of abandonment.¹ As Abandonment Activities have progressed, NGTL has identified changes to Program implementation warranting an update in relation to the Countess West RMS site and requiring a variance to Schedule A of the Order in relation to the NPS 8 Cessford East Lateral. Details in support of the Program update and variance request are provided below.

Program Update - Countess West RMS

In July 2021, NGTL divested a portion of the NPS 4 Countess West Lateral to Pioneer Gas Co-op Ltd. (Pioneer).² Pioneer has recently advised NGTL of a residual need for the small existing access (driveway) into the NGTL-owned Countess West RMS site to be maintained. The driveway is approximately 22 m long by 7 m wide and Pioneer has confirmed it continues to be required to support ongoing access to Pioneer's own sales tap (on the south edge of the meter station boundaries) and transition location of the portion of the pipeline it purchased from NGTL. NGTL is in the process of finalizing an agreement with Pioneer to maintain this access for Pioneer's continued use.

¹ Filing ID: C23857.

² Filing ID: C12949.

NGTL confirms that all other Abandonment Activities³ at the Countess West RMS have been completed and commits to updating the Commission on abandonment and reclamation efforts associated with this small access in a future abandonment application, at such time that Pioneer no longer requires it. NGTL does not anticipate any adverse impacts to environmental protection outcomes or the need for Environmental Protection Plan (EPP) updates resulting from this change and confirms that reclamation outcomes associated with the Countess West RMS site (less the small access), will be monitored and reported in compliance with Order Condition 12.

NGTL engaged with both the adjacent landowner and the County of Newell regarding NGTL's plan to maintain the Countess West RMS site access. Both parties confirmed they did not have any concerns with NGTL's approach, which NGTL understands is consistent with the County of Newell's preference to avoid construction of any new access to support the Pioneer sales tap.

Variance - NPS 8 Cessford East Lateral

In its Application, NGTL proposed to remove approximately 790 metres (m) of the Cessford East Lateral, including pipeline from underneath Highway (HWY) 561, and Range Road (RR) 110. This approved methodology and length are expressly detailed in Schedule A of the Order.⁴ As a result of field conditions (dry, compact soil) during implementation and depth of cover at the centre line of the roads,⁵ NGTL has not been successful in its attempts to pull the pipe sections from under these crossings, as planned.

NGTL has since evaluated the safety risks of further attempts to pull these pipe sections as well as the significant disturbance associated with a full excavation of the roads to otherwise remove them and further consulted with the owner/operators of the roads. As a result, NGTL has determined the most appropriate action to now be abandonment in-place of approximately 31 m of the Cessford East Lateral under HWY 561 and approximately 23 m under RR 110.

To ensure the HWY crossing is left in-place in a safe and secure manner, NGTL has filled the HWY crossing with concrete and capped it on each end. Conversely at RR 110, NGTL has not applied special treatment (concrete fill), due to the small diameter of pipe and the depth of cover of the pipeline. NGTL anticipates that any subsidence at RR 110 will be minor in nature and sufficiently managed by the routine road maintenance activities carried out by the responsible party (i.e., routine gravel and grading) such that it will not create a safety issue.

NGTL notes that the scope, scale and nature of the changes do not result in changes to the project footprint and are addressed by existing standard mitigation measures such that updates to the Program's EPP are not required. The changes do not result in new environmental interactions not previously assessed in the Program's Environmental and Socio-economic Assessment or significant environmental effects.

NGTL confirms the pipeline sections at the road crossings will be incorporated into NGTL's

³ Per NGTL's Application, the physical work to abandon the Facilities, whether by removal or in-place.

⁴ Filing ID: C23857-3 at PDF Page 6 of 14.

⁵ Approximately 2.29 m [7'6"] at HWY 561 and approximately 1.65 m [5'5"] at RR 110.

Abandoned Pipeline Monitoring Plan for the 2021 Abandonment Program⁶ and that the remaining 736 m of the Cessford East Lateral that has been removed and reclamation of its disturbed areas will be reported in Order Condition 12.⁷

NGTL has sent notification to the adjacent Landowners (Alberta Ministry of Environment and Protected Areas, on behalf of Provincial Crown lands and Special Areas Board Area No. 2) and Crown occupant (grazing lease holder) regarding its change in abandonment method at the road crossings. To date, no issues or concerns have been raised. In addition, NGTL has engaged with Alberta Transportation and Special Areas Board Area No. 2, as the owner/operators of the roads regarding the change in abandonment method. Alberta Transportation indicated it will reopen the permit to working near the HWY, to update the abandonment method. NGTL has provided Alberta Transportation updated mapping for this purpose as requested, indicating the pipeline will be abandoned in-place and filled at HWY 561. NGTL will follow up with Alberta Transportation as required in accordance with any Commission feedback or amending order it may issue as NGTL requests below. No further issues or concerns have been raised to date.

Closing

Considering the foregoing NGTL requests the Commission:

- vary Schedule A of Order and issue an amending order as required in accordance with section 69 of the CER Act to reflect NGTL's change in abandonment method to portions of the NPS 8 Cessford East Lateral as described above.
- grant NGTL any other relief the Commission considers appropriate in accordance with section 68 of the CER Act.

If the Commission requires additional information with respect to this filing, please contact me by phone at (403) 920-2940 or by email at nicole_prince@tcenergy.com.

Yours truly,
NOVA Gas Transmission Ltd.

Original signed by

Nicole Prince
Regulatory Project Manager,
Regulatory Facilities, Canadian Natural Gas Pipelines

Attachment

cc: Amélie Fortier, Canada Energy Regulator

⁶ Filing ID: C22504.

⁷ Filing ID: C23857.

REVISED SCHEDULE A
Order ZO-006-2023

NOVA Gas Transmission Ltd.
Application dated 3 May 2022
assessed pursuant to subsection 241(1) of the *Canadian Energy Regulator Act* and
section 50 of the *Canadian Energy Regulator Onshore Pipeline Regulations*

NGTL 2021 Meter Stations and Laterals Abandonment Program Project
File OF-Fac-Gas-N081-2022-05 01

Pipeline Specifications – Bison Lake Lateral

Project Type	Abandonment
Location (endpoints)	From 15-05-95-15 W5M to 01-05-95-16 W5M (Alberta)
Approximate Length	9.6 km (in-place)
Outside Diameter	323.9 mm (NPS 12)
Wall Thickness	5.6 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

Pipeline Specifications – Cessford East Lateral

Project Type	Abandonment
Location (endpoints)	From 03-06-24-10 W4M to the Cessford East Receipt Meter Station in 16-36-23-11 W4M (Alberta)
Approximate Length	790-736 m (by removal) <u>and 54 m (in-place)</u>
Outside Diameter	219.1 mm (NPS 8)
Wall Thickness	5.6 mm
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Pipeline Specifications – Chester Creek Lateral

Project Type	Abandonment
Location (endpoints)	From 07-30-94-16 W5M to 07-30-94-16 W5M (Alberta)
Approximate Length	70 m (by removal)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	6 mm
Product	None

Pipeline Specifications – Countess West Lateral

Project Type	Abandonment
Location (endpoints)	From 01-23-20-16 W4M to 04-24-20-16 W4M (Alberta)
Approximate Length	230 m (by removal)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	2.8 mm
Product	None

Pipeline Specifications – Rambling Creek Lateral

Project Type	Abandonment
Location (endpoints)	From 07-21-90-4 W6M to 09-31-90-01 W6M (Alberta)
Approximate Length	27.3 km (in-place)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	3.2 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Pipeline Specifications – Russell Creek Lateral

Project Type	Abandonment
Location (endpoints)	From 04-03-96-10 W5M to 10-05-95-15 W5M (Alberta)
Approximate Length	55.9 km (in-place)
Outside Diameter	273.1 mm (NPS 10)
Wall Thickness	4.8 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

Pipeline Specifications – Sakwatamau River Sales Lateral

Project Type	Abandonment
Location (endpoints)	From 05-16-64-13 W5M to 04-02-65-13 W5M (Alberta)
Approximate Length	7.3 km (in-place)
Outside Diameter	168.3 mm (NPS 6)
Wall Thickness	3.3 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Pipeline Specifications – Tweedie South Lateral

Project Type	Abandonment
Location (endpoints)	In 12-05-68-12 W4M (Alberta)
Approximate Length	380 m (in-place) 20 m (by removal)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	3.2 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

Pipeline Specifications – Tweedie South M/S Producer Tie-In

Project Type	Abandonment
Location (endpoints)	From 12-05-68-12 W4M to 12-05-68-12 W4M (Alberta)
Approximate Length	270 m (by removal)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	2.8 mm
Product	None

Pipeline Specifications – Virginia Hills Lateral

Project Type	Abandonment
Location (endpoints)	From 09-17-64-13 W5M to 10-16-63-11 W5M (Alberta)
Approximate Length	23.5 km (in-place) 90 m (by removal)
Outside Diameter	219.1 mm (NPS 8)
Wall Thickness	4 mm
Pipe Material	Steel
External Coating Type	Polyethylene tape
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Pipeline Specifications – Wayne North Lateral

Project Type	Abandonment
Location (endpoints)	From 12-04-28-20 W4M to 03-04-27-21 W4M (Alberta)
Approximate Length	13.8 km (in-place) 120 m (by removal)
Outside Diameter	168.3 mm (NPS 6)
Wall Thickness	4.8 mm
Product	None

Pipeline Specifications – Wiau Lake South Lateral

Project Type	Abandonment
Location (endpoints)	From 09-06-74-8 W4M to 12-06-74-08 W4M (Alberta)
Approximate Length	970 m (in-place)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	3.2 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

Pipeline Specifications – Winefred River West Lateral

Project Type	Abandonment
Location (endpoints)	From 02-04-78-06 W4M to 14-34-77-05 W4M (Alberta)
Approximate Length	10.9 km (in-place)
Outside Diameter	114.3 mm (NPS 4)
Wall Thickness	3.2 mm
Pipe Material	Steel
External Coating Type	Extruded polyethylene
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Facilities Specifications – Bison Lake Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	15-05-95-15 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

Facilities Specifications – Calais Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	15-16-69-22 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

Facilities Specifications – Chester Creek Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	07-30-94-16 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

Facilities Specifications – Countess West Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	04-24-20-16 W4M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Facilities Specifications – Keppler Creek Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	01-28-92-17 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

Facilities Specifications – Rambling Creek Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	07-21-90-04 W6M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

Facilities Specifications – Russell Creek Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	04-03-96-10 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

Facilities Specifications – Sakwatamau Sales Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	04-02-65-13 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Facilities Specifications – Tweedie South Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	12-05-68-12 W4M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

Facilities Specifications – Valhalla Sales Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	14-17-77-09 W6M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None

Facilities Specifications – Virginia Hills Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	09-17-64-13 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

Facilities Specifications – Wiau Lake South Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	09-06-74-08 W4M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

SCHEDULE A (continued)
Order ZO-006-2023

Facilities Specifications – Winefred River West Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	02-04-78-06 W4M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings, yard piping and fencing
Product	None

Facilities Specifications – Wolverine River Receipt Meter Station

Project Type	Abandonment
Facility Type	Metering station
Location	08-15-98-16 W5M (Alberta)
Description	Permanent removal of all aboveground facilities, including the meter station buildings and yard piping
Product	None