

Frequently Asked Questions

Directive 058 – Alberta Oilfield Waste Form and Hydrovac Material

May 2022

Oilfield Waste Form

Q1. Directive 058, section 3, states that waste forms may be hard copy or electronic. Is there anything special that a licensee needs to know if using the electronic option?

A1. A licensee may download a fillable electronic version of the Alberta Oilfield Waste Form from our website or use one developed in house or by a third party.

These electronic options may be used provided the following conditions are met:

- The licensee is able to produce a printed or electronic copy of the form and supporting data for two years after the date the waste was transported.
- There is a unique numbering system to ensure that the licensee can track and reconcile their waste shipments.
- The electronic form if developed in house or by a third party mirrors the most recent version of the AER Alberta Oilfield Waste Form.
- The licensee follows the completion instructions identified on the back and the distribution instructions on the front of the AER Alberta Oilfield Waste Form.

Hydrovac Material

Q2. Appendix 2 of the directive has hydrovac material (impacted) listed as an oilfield waste. How does a licensee determine if hydrovac material is impacted or nonimpacted?

A2. If it is uncertain whether hydrovac material is impacted, it must first be properly stored in accordance with [Directive 055: Storage Requirements for the Upstream Petroleum Industry](#) and tested.

Although field-testing methods may be acceptable, laboratory analysis should be conducted if the material might contain contaminants of concern that cannot be field tested, if historical evidence indicates that impacts are likely, or if the field testing is uncertain. Ultimately, it is the licensee's responsibility to ensure that appropriate steps have been taken to determine whether any material originating from an upstream petroleum site is impacted.

If testing indicates that the hydrovac material does not meet *Alberta Tier 1 Soil and Groundwater Remediation Guidelines*, the licensee must manage the impacted hydrovac material as an oilfield waste.

Q3. What are the regulatory requirements for managing impacted hydrovac material vs. nonimpacted hydrovac material?

A3. Impacted hydrovac material must meet the requirements of *Directive 058* since it is an oilfield waste (tracking requirements will also have to be met). Send any questions about managing impacted material to Directive058@aer.ca.

Nonimpacted hydrovac material must be managed in a way that ensures the waste does not cause an adverse effect, as per *EPEA*.

Management options for nonimpacted hydrovac material include

- using the nonimpacted hydrovac material to backfill hydrovac holes,
- spreading the nonimpacted hydrovac material on the site of origin to dry, then incorporating it as fill material (e.g., on a well-site pad or road grade),
- moving nonimpacted hydrovac material to private land, with permission from the landowner,
- moving nonimpacted hydrovac material to another *Public Lands Act* disposition or site and notifying the AER using the appropriate email address below, and
- using clean trucks to transport the material.

Requirements for nonimpacted material are found in various pieces of legislation, including *EPEA* and the *Public Lands Act*. Among the requirements are the following:

- Soil quality must be similar chemically and physically to the receiving site's soil quality.
- There must be no burying of topsoil or admixing of topsoil and subsoil.
- End-use site reclamation objectives must not be compromised or limited (e.g., by introducing saline or alkaline subsoils that limit or change vegetation communities).
- Nonimpacted hydrovac material managed on a *Public Lands Act* disposition must meet the terms and conditions of approval for the public land disposition.

Further questions about managing nonimpacted material can be sent to the following email addresses:

- AERAuth.OilGas@aer.ca
- AERAuth.InSitu@aer.ca
- AERAuth.Mining@aer.ca