

Draft *Pipeline Rules Bulletin 2020-24* (released November 2020) Stakeholder Feedback and AER Response



We would like to thank all those who provided comments. We reviewed each one and consolidated comments covering similar issues. What follows is a summary of the issues raised and our responses.

We have included entries in this document to highlight their exclusion from the new edition of the Pipeline Rules. Reviewers may not have expressly commented on these entries.

Comments on grammar, punctuation, and cross-referencing have not been summarized, but changes were made where needed.

Stakeholder Feedback – Issue	Rules Section	AER Response
Interpretation		
Change or update some terms and definitions for clarity.		<p>We updated some terms and definitions for clarity and consistency with other standards and industry terminology as appropriate.</p> <p>Alberta One-Call has rebranded to the Utility Safety Partners, which has been updated throughout the <i>Pipeline Rules (Rules)</i>.</p>
<p>Mechanical Damage: Industry generally refers to mechanical damage as damage caused by mechanical excavation equipment regardless of whether the damage occurred above or below ground. The AER should remove this term and expand the definition of contact damage instead of introducing a new term.</p> <p>Tests: Introducing different test terms and definitions into the <i>Pipeline Rules (Rules)</i> adds unnecessary complexity and confusion when trying to understand if the requirement applies to a particular test, some tests, or all tests. The AER should remove the different terms and focus on pressure tests, which are well defined in <i>CSA Z662, Oil and gas pipeline systems</i>.</p>		<p>Although the terms and definitions below were proposed additions to the <i>Rules</i>, they were not included in the new edition:</p> <ul style="list-style-type: none"> • mechanical damage • qualification pressure test • requalification pressure test • service test <p>The updated <i>Rules</i> now refer solely to contact damage, and the definition has been expanded to include damage incurred above and below ground.</p> <p>The updated <i>Rules</i> now refer solely to pressure tests.</p>
<i>Not included in the initial draft for stakeholder feedback</i>		<p>We added the following terms and definitions to differentiate the types of temporary surface pipelines:</p> <ul style="list-style-type: none"> • temporary surface pipeline for water conveyance

Stakeholder Feedback – Issue	Rules Section	AER Response
		<ul style="list-style-type: none"> • temporary surface pipeline for well testing or bypass • group 1 water • group 2 water • group 3 water <p>We made these additions to accommodate the use of temporary surface pipelines for water conveyance permitted in the <i>Rules</i>. These terms are necessary to clarify which requirements apply to the different types of temporary surface pipelines. The definitions will be added to the temporary surface pipeline for water conveyance section of <i>Directive 077: Pipelines—Requirements and Reference Tolls</i>.</p>
<p>Clarify jurisdiction for bidirectional flow.</p>		<p>We added clauses to clarify the application and licensing process for bidirectional natural gas pipelines, temporary surface pipelines for water conveyance, and temporary surface pipelines for well testing or bypass.</p>
<p>Part 1 Administration</p>		
<p><i>Not included in the initial draft for stakeholder feedback</i></p>	<p>Compliance with directives</p>	<p>We added language around persons using a temporary surface pipeline throughout the <i>Rules</i> to enable us to enforce <i>Directive 077</i> for unlicensed temporary surface pipelines for water conveyance and temporary surface pipelines for well testing or bypass.</p>
<p>Remove mechanical damage (see above). Clarify contact information (Alberta Government is too broad).</p>	<p>Notification</p>	<p>We removed the proposed term “mechanical damage” based on stakeholder feedback.</p> <p>We updated the 24-hour emergency contact line information used to report a leak, break, test failure, or contact damage.</p> <p>However, the name of the contact centre could change at any time as it is controlled by the Government of Alberta and cannot be further defined.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Clarify this section, it is confusing.</p> <p>Spell out ABSA (Alberta Boilers Safety Association).</p> <p>Remove requirements about replacing expanded liners for pipeline sections less than 100 metres long.</p> <p>Keep only the requirements for liner installation or complete removal for licensing purposes.</p> <p>What is meant by exceptional circumstances?</p>	<p>Application for licence</p>	<p>We clarified the clauses and included ABSA's title in full.</p> <p>We also updated the clause to indicate that an application is not required for replacement of an expanded liner or freestanding liner for pipeline sections less than 100 metres long.</p> <p>Expanded liner and freestanding liner were added to clarify the meaning of pipeline liner, which was the only reference in the <i>Rules</i>.</p> <p>We did not accept the suggestion to remove requirements about replacing expanded liners more than 100 metres long. We need licensees to amend their licences with this information because it is important information. Liners more than 100 metres long require an exemption from the AER.</p> <p>We did not define exceptional circumstances as there are too many possible scenarios to consider. The change was included to allow us to consider cases where a licensee or applicant requests an exemption from the requirements.</p>
<p><i>Not included in the initial draft for stakeholder feedback</i></p>	<p>Application for licence</p>	<p>By introducing temporary surface pipelines for water conveyance into the <i>Rules</i>, we have identified in the <i>Rules</i> the types of temporary surface pipelines that do not require a licence to construct and operate.</p> <p>Temporary surface pipelines for water conveyance and temporary surface pipelines for well testing or bypass in operation for less than 21 days do not require a licence if they meet the definition and requirements for those types of pipelines outlined in <i>Directive 077</i>.</p>
<p>There is no flexibility for construction to start on a date other than the date in the original notification. This should be changed.</p>	<p>Notice of construction commencement (formerly Commencement of construction)</p>	<p>Licensees must notify the AER of the construction start date at least 24 hours before the start date but not more than 14 days prior.</p> <p>Licensees are not required to provide a notice of construction start date for pipeline ROW preparation, which could be well in advance of the actual pipeline construction.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Remove reference to cancel the licence. As written, it implies that work will be completed and needs to be extended, not cancelled.</p> <p>Clearly differentiate between the scenarios to avoid duplication and confusion.</p>	<p>Notice or application in case of delay or failure to complete construction (formerly Notice to Regulator of delay or failure to complete licensed work)</p>	<p>We removed the reference to “cancel” the licence from the proposed requirements.</p> <p>We also clarified and simplified notification requirements and removed unnecessary details already in <i>Directive 056: Energy Development Applications and Schedules</i>. Licensees must notify the AER as per <i>Directive 056</i>.</p> <p>Regarding scenarios, details about extending or cancelling the licence will be in <i>Directive 056</i>.</p>
<p><i>Not included in the initial draft for stakeholder feedback</i></p>	<p>Notice or application in case of delay or failure to complete construction (formerly Notice to Regulator of delay or failure to complete licensed work)</p>	<p>Licensees must notify the AER in accordance with <i>Directive 056</i> whether a licence has expired or will expire before the start of pipeline construction, that pipeline construction has started but will be delayed for three or more months, or that the pipeline will not be completed. This notification is so the AER has accurate information of what pipelines have been constructed, partially constructed, or not constructed and can manage stakeholder concerns and ensure the worksite is in a safe condition.</p>
<p>Can the licensee use an operator's emergency response plan (ERP)?</p> <p>Change licensee to operator in related clauses.</p>	<p>Emergency response plans</p>	<p>We removed the proposed requirement to submit an ERP because it is already covered by reference to <i>Directive 071: Emergency Preparedness and Response Requirements for the Petroleum Industry</i>. Requirements.</p> <p>We did not make the requested change from “licensee” to the “operator” because the licensee is ultimately responsible for fulfilling the regulatory requirements.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Simplify this clause (i.e., remove SLMS and IMP since <i>CSA Z662</i> is already referenced). Is this redundant with references to <i>CSA</i>?</p> <p>Clarify if this applies to new pipelines only.</p> <p>Are there exceptions to this requirement?</p> <p>Municipalities request that they be able to access these records.</p>	<p>Pipeline records and documents</p>	<p>Requirements for the Safety and Loss Management System (SLMS) and integrity management program (IMP) are included as separate clauses in the <i>Rules</i>. Record keeping is part of SLMS and IMP.</p> <p>We aligned with <i>CSA Z662</i> expectations regarding what documents and records must be completed and retained by a licensee. Records have been a requirement of <i>CSA Z662</i> for several years; therefore, alignment with the standard will help with clarity.</p> <p>In addition, the <i>Rules</i> specify those documents or records that we require and may request. The requirement does not specify a format so long as it is acceptable to us. Also, we are still able to request records as specified by the <i>Rules</i> in Part 1(12), Pipeline records and documents (not just new pipelines).</p> <p>Under <i>Responsible Energy Development Act</i>, only the regulator has access to the records. Municipalities can request records on a case-by-case basis.</p>
<p>Align this section with <i>Bulletin 2015-034</i>.</p> <p>Clarify who is responsible for the transfer of records.</p>	<p>Transfer of records</p>	<p>The proposed new section outlines the expectations for the transfer of documents and records between parties.</p> <p>We added this new section to incorporate <i>Bulletin 2015-34</i> requirements and make them enforceable under the <i>Rules</i>. This change will enable a successor licensee to obtain as much information as possible to incorporate new assets into its SLMS and IMP.</p> <p>If records cannot be obtained or are insufficient, an engineering assessment can be conducted to demonstrate that the pipeline is fit for service.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Split the SLMS and IMP into separate clauses.</p> <p>Clarify what documents must be made available to the AER.</p> <p>Provide further guidance on expectations regarding the SLMS and IMP.</p>	<p>Safety and Loss Management System</p>	<p>We updated the <i>Rules</i> to include two separate clauses for SLMS and IMP. These requirements align with <i>CSA Z662</i> clauses 3 and 10, which are supported by annex A (mandatory) and annex N (nonmandatory). However, the addition of SLMS and IMP to the <i>Rules</i> makes both annexes A and N of the standard mandatory. The proposed SLMS and IMP requirements also align with our approach to be less prescriptive and more focused on outcomes and risk. The new sections for SLMS and IMP replace the former operations, maintenance and integrity management manuals section, which had detailed requirements for specific activities. That information was no longer needed given the new approach.</p> <p>The <i>Rules</i> expand this requirement to include both licensees and persons using a temporary surface pipeline. The <i>Rules</i> also include abandoned pipelines as identified under section 25 of the <i>Pipeline Act</i>.</p> <p>Requirements regarding documentation are included in SLMS and IMP. Reviews conducting by the AER will consider the specific situation.</p>
<p>See comments in the SLMS section.</p>	<p>Integrity Management Program</p>	<p>Please see our response under Interpretation, safety and loss management system.</p>
<p>Part 2 Materials and Design</p>		
<p>What is meant by sample?</p>	<p>Materials to be provided to the Regulator</p>	<p>We improved the logical order of the requirements by moving this information from Part 4 to Part 2.</p> <p>We updated this section with references to sections 34(1) and 34(2) of the <i>Pipeline Act</i> and provided additional details about what we mean by sample. In addition, we specified the type of information that must be submitted and that we can request analysis as well as physical samples.</p>
<p>The CSA is developing new standards that should be included in the <i>Rules</i>.</p> <p>Potential conflict with new edition of <i>CSA Z245, Steel pipe</i>, material standards because <i>CSA Z662</i> can be out</p>	<p>CSA standards (formerly Codes and standards)</p>	<p>We updated the reference to <i>CSA Z662</i> and removed the list of individual standards.</p> <p>We added a new clause to permit the use of materials manufactured under earlier editions of <i>CSA Z245</i> when an engineering assessment</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>of sync due to update cycles and not refer to the latest edition of <i>CSA Z245</i>.</p>		<p>confirms that the materials meet the requirements of the current edition of <i>CSA Z245</i>.</p>
<p>A list of preapproved repair materials would be helpful. The CSA does not include all materials currently in use and are trying to resolve this.</p> <p>Clarification needed regarding when an engineering assessment must be conducted. When would an assessment be rejected?</p>	<p>Approval of non-standard materials or methods</p>	<p>We made editorial changes and removed the redundant and unnecessary clauses.</p> <p>We cannot provide a list of preapproved repair materials or methods because it is not possible to list all scenarios. The use of nonstandard materials must be reviewed and approved by us on a case-by-case basis. The application must include an engineering assessment that is appropriate to the situation. In the spirit of outcome-based regulations, we will not define the meaning of appropriate.</p>
<p>Clause may conflict with <i>CSA Z662</i> clauses 10 and 16 as it only applies to composites.</p> <p>Clarify if an engineering assessment is required every time.</p>	<p>Limits on polymeric or composite pipe (formerly Polymeric or fibre-reinforced pipe)</p>	<p>We updated the section to include polymeric or reinforced composite pipe to clarify that there are many types of composite pipe. We removed the reference to fibre-reinforced pipe to avoid contradicting CSA requirements.</p> <p>We added a new clause regarding how reinforced composite pipe is to be assessed and installed. We made this change because reinforced composite pipe has proven to be sensitive to operational conditions that may reduce the pipeline's service life. Such changes in conditions are of concern when they occur without an evaluation of their effects. Manufacturers have engineering staff to review proposed applications, but licensees do not always use this service.</p> <p>An engineering assessment will only be required when guidance from the pipeline manufacturer's representative is unavailable.</p>
<p>This proposed change encompasses all new pipelines and would add significant costs, particularly for small diameter lines, which is not necessarily commensurate with risk.</p> <p>The CSA already requires that sour lines are designed to be piggable. Recommend that larger diameter pipe be inspectable, and other lines are maintenance piggable only.</p>	<p>Design for maintenance, inspection and purging</p>	<p>This proposed section was added to require pipeline construction to accommodate the passage of maintenance, inspection, and purging pigs if required by the licensee's IMP or <i>CSA Z662</i>. We updated the requirements to improve alignment with the true risks.</p> <p>We recognize that <i>CSA Z662</i> already requires pigging for sour pipelines. We are making it a requirement for all other pipelines unless a licensee or operator can justify why it should not be needed following assessment under the licensee's IMP. Most pipeline incidents are</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>There should be exemptions for short tie-ins, sweet fuel gas line etc.</p>		<p>because of internal corrosion, and pigging is the most effective method to prevent this issue, so we wish to require pigging where appropriate.</p>
<p>This should be its own section and not be included with SLMS and IMP requirements.</p> <p>Why just pigs? There are other risk mitigation measures that are effective.</p>	<p>Pipeline maintenance pigs</p>	<p>Yes, this section has been separated from SLMS and IMP clauses and moved to Part 2 of the <i>Rules</i>.</p> <p>Pigging is not specifically mentioned in <i>CSA Z662's</i> section on IMP. Corrosion is a leading contributor to incidents and needs to be highlighted as a proactive prevention method.</p>
<p>What about pipelines designed pre-<i>CSA Z662</i>?</p> <p>This is not an exemption as CSA already allows this.</p>	<p>Exemption from standard</p>	<p>We have removed this section. <i>CSA Z662</i> allows for licensees to conduct an engineering assessment for pipelines built to earlier standards.</p>
<p>Change:</p> <ul style="list-style-type: none"> • leak or break to pipeline failures • engineering assessment to analysis • licensee to operator or include both <p>More guidance is needed on gas leak detection.</p>	<p>Emergency shutdown devices and check valves</p>	<p>We changed clause 1 to clarify that it applies to any pipeline with a separate gas phase under operating conditions. It was unclear before if it was a gas pipeline or other type of pipeline.</p> <p>We removed the clause requiring submission of records because the new clause in Part 1, Pipeline records and documents, already captures this.</p> <p>We did not change “leak” and “break” as these terms are used in the <i>Pipeline Act</i>.</p> <p>We kept the term engineering assessment because it is an appropriate term and standard practice.</p> <p>We did not make the suggested change from “licensee” to “operator.” The licensee is responsible for complying with the requirements. The licensee may choose to contract operations to another party, but the licensee is ultimately the responsible party.</p> <p>A licensee must make its own determination for leak detection based on their pipeline system; we cannot provide written guidance on every scenario. Licensees are welcome to discuss their situation with us. <i>CSA Z662</i> describes leak detection requirements.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Clarify if gas stream includes pipelines with a gas phase (multiphase pipelines) or gas pipelines only.</p> <p>Proposed changes are inconsistent with <i>Directive 056</i> regarding blending.</p>	<p>Control systems in blended gas streams</p>	<p>This section applies to gas pipelines only and not multiphase pipelines. In a blended gas stream, if there is hydrogen sulphide (H₂S) with a concentration greater than the blended stream, regardless of moles, the pipeline must have two independent safety systems. The safety systems will ensure the H₂S concentration of the downstream pipeline is not exceeded.</p> <p>We removed minimum condition for H₂S to be 10 moles or more. The requirement applies to all gas pipelines containing H₂S.</p> <p>We added a reference to clause 23(9) for annual inspection of automatic safety shutdown system. This addition is not a new requirement but a reference to an existing requirement to ensure that licensees inspect safety shutdown systems regularly.</p> <p><i>Directive 056</i> will be updated as required to ensure consistency with the changes made to the <i>Rules</i>.</p>
<p>Will this include pipelines that are under design or approved but not constructed? Could be very costly to rework.</p> <p>Suggest exceptions for components open to atmospheric tanks and not subject to overpressure.</p> <p>Reference to <i>CSA Z245.12</i> only covers steel pipelines. Therefore, the clause should be specific to steel if that is the intent.</p>	<p>Equipment pressure ratings</p>	<p>We changed this section to clarify that it applies to new pipelines or pipelines being modified after the <i>Rules</i> come into effect. Part 10(86), Coming into force, will address when this section takes effect.</p> <p>We simplified and clarified that pipeline components must have pressure ratings equal to or greater than the licensed maximum operating pressure.</p> <p>We aligned the requirements with <i>CSA Z662</i> requirements (not specific to only steel lines), removed unnecessary requirements, and clarified requirements for licensed maximum operating pressure (MOP) and for pipeline components manufactured using other standards allowed by CSA. Components manufactured using a different standard are allowed by <i>CSA Z662</i>, but they must also follow the requirements in <i>CSA Z662</i> pressure nominal designation or as allowed by the AER.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Clarify if this applies only to new pipelines. Should allow for existing pipelines if an MOP increase is desired.</p> <p>Exceptions should be allowed pending an engineering assessment up to <i>CSA Z662</i> maximums.</p>	<p>Stress level limitations</p>	<p>We changed the per cent specified minimum yield strength (SMYS)¹ for both aboveground and below ground sour gas pipelines to 60%. Previously, aboveground pipelines were 50% SMYS. This change will enable licensees to use common piping material for pipelines and risers should they wish and eliminate transition pieces to maintain a common inside diameter. Licensees may design aboveground equipment to stress levels under 60% if they choose.</p> <p>If a licensee wants to increase its licensed MOP, which would result in an increased stress level, or request an exception to this requirement, an amendment would be required.</p>
<p>Would a properly designed load-bearing structure (e.g., concrete slab) be considered equivalent to casing from a location factor perspective?</p> <p>Does this proposed change apply to preexisting pipelines and designs completed before the changes to the <i>Rules</i>?</p>	<p>Pipeline crossing highway or road (formerly Casing under highway, road or railway)</p>	<p>We updated the clause to include a reference to CSA requirements regarding load-bearing structures and equivalency. When building a pipeline, we can easily ensure appropriate pipeline wall thickness and cover depth under a roadway and its associated ROW or road allowance. When improving a roadway over an existing pipeline, rebuilding the pipeline may not be necessary, provided an engineering assessment done before the start of road construction confirms that the existing cover depth and pipeline wall thickness are adequate for construction and continued safe pipeline operations. This assessment might avoid some pipeline rework costs. <i>CSA Z662</i> clause 10.8 discusses the need for an engineering assessment and the options available, which do not need to be repeated in the <i>Rules</i>.</p> <p>We also combined requirements from other sections (i.e., casing under highway, road, or railway and modifications due to highway, road, or railway). In addition, we removed the reference to railways as the updated clauses do not mention railways and are adequately addressed in <i>CSA Z662</i>.</p> <p>Yes, depending on the results of the engineering assessment, an upgrade may be needed.</p>

¹ % SMYS is defined as the hoop stress level expressed as a percentage of the specified minimum yield strength of the pipe based on nominal wall thickness.

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>The proposed changes do not align with CSA table 4.9, which requires 0.75 m for the ROW and 1.2 m for the travelled surface. The CSA also does not delineate between a highway and road.</p> <p>Are the terms undue delay and hinderance defined? Otherwise, they are subject to interpretation by the AER and operators.</p> <p>When must the minimum requirements be met? When do licensees have flexibility if it is justified in their SLMS or IMP?</p>	Minimum earth cover	<p>We rewrote and reorganized this section to clarify the requirements and put them into a logical order.</p> <p>We changed the depth of cover within the road ROW from 1.1 to 1.2 m to align with CSA. Additional requirements to restore exposed or deficient earth cover were also provided. In some cases, we are more conservative than the CSA to ensure pipeline integrity and safety. The changes also coordinate earth cover requirements with the <i>Water Act</i>.</p> <p>These changes allow licensees to determine the appropriate cover based on the requirements for existing pipelines or an engineering assessment. Also, deficiencies in earth cover must be rectified, and the AER notified of any known exposed pipelines.</p>
<p>Ensure clarity between permanent aboveground pipelines and temporary surface pipelines.</p> <p>No concerns with moving temporary surface pipeline application requirements to <i>Directive 056</i> if a notification in the digital data submission system is sufficient and not a full pipeline application.</p>	Installing surface pipelines (formerly Surface pipelines)	<p>We clarified that this section applies to licensed permanent surface pipelines only.</p> <p>Requirements for temporary surface pipelines for water conveyance and temporary surface pipelines for well testing or bypass will be in in <i>Directive 077</i>.</p>
<p>How are we to manage surge pressures? The changes in the draft would be a significant departure from <i>CSA Z662</i>. This would impact the cost of designing or modifying new and existing pipelines.</p> <p>Refer to the complete Canadian Association of Petroleum Producers and Canadian Energy Pipeline Association submissions regarding this section in the complete comments attachment.</p>	Operating pressure	<p>We rewrote and reorganized this section to align with CSA.</p> <p>We clarified that the licensed MOP must not be exceeded except for circumstances described in <i>CSA Z662</i> (e.g., transients, surge activities, etc.).</p> <p>We also made clarifications to ensure that pipelines operate within the same MOP allowance, combined systems do not become overpressured, and when no protection system is required (given certain conditions are met). We provide licensees flexibility in configuring interconnected systems but clearly outline the requirements to ensure alignment with <i>CSA Z662</i> and the <i>Pipeline Act</i>.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
Part 3 Pressure Testing		
<p>What is meant by newly constructed? It is subject to interpretation.</p> <p>The requirements for requalification pressure tests, qualification pressure tests, and service tests are hard to follow.</p> <p>Recommend making the requirement more risk based. Not all repairs need pressure testing.</p> <p>Refer to Canadian Natural Resources Limited's complete submission regarding this section in the complete comments attachment.</p>	<p>Placing pipeline into operation</p>	<p>We removed requalification, qualification, and service test terms and definitions. The focus is pressure tests, which are well understood by industry.</p> <p>A satisfactory pressure test must be completed for newly constructed or modified pipelines. We added the engineering assessment requirement to ensure that discontinued or abandoned pipelines or pipelines that have been unused for a period are fit for service before the resumption of use. This change aligns with <i>CSA Z662</i> requirements and the <i>Rules</i> and focuses on risk.</p>
<p>There is confusion regarding the terms pressure tests, service test, and test.</p> <p>The AER should not specify the record type.</p>	<p>Notice to Regulator (formerly Notice to Regulator of pressure test)</p>	<p>We removed test and specified pressure test rather than complicating the requirements.</p> <p>Also, we expanded this section to include clauses from the Report of leak or break section.</p> <p>We clarified that leak tests do not require notification if they do not exceed licensed MOP.</p> <p>We grouped the requirements for notifying the AER of a leak or break occurring during a pressure test as all leaks and breaks are reportable as per the <i>Pipeline Act</i>.</p> <p>We removed the requirement for capturing charting records and added a new umbrella clause for charting records that does not specify the report format.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>This section is redundant with <i>CSA Z662</i> for existing pipelines. It might contradict CSA clause 8.1.2. There are circumstances where pressure testing without cover is appropriate.</p> <p>Wording regarding testing is too vague and should refer specifically to pressure testing.</p> <p>Details regarding safety should be covered in <i>Occupational Health and Safety Act (OHS)</i> and not the <i>Rules</i>.</p>	<p>Conditions for pressure testing</p>	<p>Pull sections can be pretested on the surface, subject to certain requirements noted in the clause.</p> <p>We removed the different classes of tests.</p> <p>We simplified our requirements, and more reliance is placed on the pressure testing requirements in <i>CSA Z662</i>.</p> <p>Although occupational health and safety requirements have been removed from the <i>Rules</i>, licensees must still meet these requirements.</p>
<p><i>Proactive AER change</i></p>	<p>Protection of persons and property</p>	<p>We removed this section as it is covered in <i>CSA Z662</i>.</p>
<p><i>Proactive AER change</i></p>	<p>Regulator’s direction on pressure testing (formerly Maximum length of pipe to be pressure tested)</p>	<p>We revised the requirements in this section for purposes of ensuring pipeline integrity and safety.</p> <p>The previous clause only referred to the length of pipe to be tested, which is very specific. We added a new clause to enable us to prohibit any unsafe or unsuitable test.</p> <p>We also added a requirement for a retest if we believe the pipeline is unsafe to operate and its safety needs to be proven.</p>
<p>Requirements are redundant with <i>CSA Z662</i>.</p> <p>Does this include qualification, requalification, or service tests?</p> <p>Reduce the minimum range for pressure reading range between 25 and 90 per cent as technology advancements have improved.</p> <p>Periodic calibration of instruments is subject to interpretation and is different for different types of instruments.</p>	<p>Recording pressure test results</p>	<p>We changed the requirements for what must be recorded and retained by the licensee for pressure tests.</p> <p>We made this section applicable to pressure tests only by removing references to requalification, qualification, and service test throughout the <i>Rules</i>.</p> <p>In addition to what is required in <i>CSA Z662</i>, we have specified additional information to be collected and retained so that we will have the necessary information to properly assess a pressure test.</p> <p>We removed the requirements for pressure reading range and calibration schedules. We recognize that the pressure reading range and</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
		calibration schedules are too specific and different instrumentation will have different requirements.
What type of test is this referring to?	Unsatisfactory pressure test (formerly Unsatisfactory test)	We have specified pressure test for clarity.
Provide examples for alternative methods. What would be acceptable to the AER?	Alternative methods for establishing pipeline integrity	We removed this section as it duplicates the “Placing pipeline into operation” section. We will not provide examples of alternative methods in the <i>Rules</i> . Licensees and applicants may clarify with us if an exemption is required.
It is unclear under what circumstances a pipeline segment would be allowed to go over 100 per cent hoop stress that wasn't a qualification test. Consideration should be given that the pipe manufacturer maximum pressure should not be exceeded at any time.	Pressure testing above 100% SMYS	We removed this section as it duplicates requirements in <i>CSA Z662</i> .
<i>Proactive AER change</i>	Pressure near test head assembly	We removed this section as it duplicates requirements in <i>CSA Z662</i> .
The MOP requirement should apply only to natural gas pipelines.	Minimum test pressure	We updated this section to remove class location wording and specify gas pipelines. <i>CSA Z662</i> is changing the class location determinations, so we will defer to CSA and have removed this from the <i>Rules</i> .
Does this apply to qualification or requalification pressure tests? Reference and ensure requirements are updated in <i>Directive 077</i> .	Pressure testing using liquid test media other than fresh water (formerly Contingency plans for liquid test media)	We updated this section to refer to pressure tests only. Terms and definitions for requalification, qualification, and service test have been removed. We simplified this section to reference <i>Directive 077</i> . Detailed procedures and requirements applicable will be moved to <i>Directive 077</i> .

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Does this apply to qualification or requalification pressure tests?</p> <p>Reference and ensure requirements are updated in <i>Directive 077</i>.</p>	<p>Pressure testing using gaseous test media (formerly Approval of gaseous test media)</p>	<p>We updated this section to refer to pressure tests only. Terms and definitions for requalification, qualification, and service test have been removed.</p> <p>We simplified this section to reference <i>Directive 077</i>. Detailed procedures and requirements will be moved to <i>Directive 077</i>.</p>
<p>Differentiate this from service tests.</p> <p>Suggest referencing <i>Directive 077</i> for clarity.</p> <p>Recommend changing the section title to Duration of pressure test.</p>	<p>Duration of pressure test (formerly Duration of test)</p>	<p>We simplified this section by referencing <i>CSA Z662</i>.</p> <p>We clarified that the requirement relates to pressure tests specifically and that a licensee may apply to the AER for a deviation from the minimum specified in <i>CSA Z662</i>.</p>
<p>The proposed requirement is already included in <i>CSA Z662</i>.</p>	<p>Pressure testing of vessels or manifolds</p>	<p>We removed this section as it duplicates requirements in <i>CSA Z662</i>.</p>
<p><i>Proactive AER change</i></p>	<p>Gases used in testing</p>	<p>We removed this section. The applicable procedures and requirements will be moved to <i>Directive 077</i>.</p>
<p><i>Proactive AER change</i></p>	<p>Release of gaseous test media</p>	<p>We removed this section. The applicable procedures and requirements will be moved to <i>Directive 077</i>.</p>
<p><i>Proactive AER change</i></p>	<p>Hydrogen sulphide gas prohibited in test medium</p>	<p>We removed this section. The applicable procedures and requirements will be moved to <i>Directive 077</i>.</p>
<p>Part 4 Ground Disturbance</p>		
<p>Draft clauses included the following requirement:</p> <p>“...where ground disturbance supervision or inspection is required for more than five cumulative days, the licensee and party undertaking the ground disturbance shall negotiate a shared distribution of costs.”</p> <p>Where did the five days come from? We recommend shortening it to three days.</p>	<p>No fees for ground disturbance (formerly No fees for ground disturbance activities)</p>	<p>We made the following changes based on the feedback:</p> <ul style="list-style-type: none"> • Reorganized and simplified the requirements. • Removed clauses regarding the shared distribution of costs—too problematic.

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>This could create ambiguity between two parties and result in contract disputes.</p>		
<p>Has the AER considered following the Canada Energy Regulator and BC Oil and Gas Commission and require licensees to develop and implement a damage prevention program using Energy Safety Canada’s Ground Disturbance and Damage Prevention – Program Development Guideline?</p>	<p>Ground disturbance approval</p>	<p>Licensees must respond to a request within 21 days. However, a request can be made to the AER if a licensee cannot be contacted.</p> <p>Licensees must respond to a request within the timeframe specified. The person proposing to conduct the ground disturbance must attempt to contact the licensee. If they are unable to do so, they must receive approval from the AER before beginning any ground disturbance activity. This is in broad alignment with CSA requirements.</p> <p><i>CSA Z662</i> integrity management programs incorporate the principles and requirements in the damage prevention program, which do not need to be specified in the <i>Rules</i>.</p>
<p>The term “regular intervals” is vague.</p>	<p>Damage prevention service (formerly Alberta One-Call)</p>	<p>We added a requirement for licensees to update the registered inventory of pipelines on a regular basis. This action is to ensure that the Utility Safety Partners (formerly Alberta One-Call) has up-to-date records of pipelines in its systems to fulfil requests with accurate data.</p> <p>Licensee pipeline systems change frequently, and these changes need to be reflected to ensure ground disturbance activities are completed safely. However, we cannot specify an exact interval as each licensee is different. The licensee should check with Utility Safety Partners to ensure compliance with any membership requirements concerning the frequency of updates.</p>
<p>Excavators often are unaware that they need to apply for a crossing agreement. If excavators had not applied for a crossing in advance, this clause gives the impression that excavation can start within 10 days when the licensee still has 21 days to respond to their request.</p> <p>Clarify that consent to excavate is not automatic upon providing notification.</p> <p>Clarify if there are exemptions for aboveground lines for ground disturbance.</p>	<p>Preparing for ground disturbance (formerly Preparation for ground disturbance)</p>	<p>We updated the clause to clarify that either Utility Safety Partners or the licensee must be notified of ground disturbance activities, and the excavating party must receive approval before starting excavation. The person proposing to conduct the ground disturbance must notify the licensee or Utility Safety Partners at least three days in advance to arrange for locating. We corrected the notice period to align with Utility Safety Partners’ policies.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
		<p>Added a clause to ensure the person proposing to conduct the ground disturbance tries to contact the licensee if Utility Safety Partners is unable to do so.</p> <p>Aboveground lines are not exempt from ground disturbance precautions.</p>
<p>Draft clauses included the following requirement: “... not delay locating and marking beyond the specified response time due to preferential choice of specific contractors without agreement of the requesting party.”</p> <p>This may conflict with licensee safety programs and approved resource providers.</p>	<p>Locating and marking of pipelines (formerly Preparation for ground disturbance)</p>	<p>We made the following changes in response to the feedback:</p> <ul style="list-style-type: none"> • Removed clause regarding preferential choice of specific contractors. • Grouped like requirements together, including restoring, remarking, and requesting new locating and marking. • Locating and marking must be provided by the licensee no later than three days irrespective of choice of contractor to ensure consistency with changes made above. • Removed fencing as an acceptable separator for exemption to locate and mark because fences are not permanent structures and can be easily removed or altered.
<p>Maintenance vehicles now have chassis ratings up to two tons (e.g., F450, F550). The requirements should be updated to reflect this.</p> <p>Agricultural operations require further definition.</p>	<p>Vehicles crossing pipeline</p>	<p>We updated the chassis ratings to two tons.</p> <p>In addition to the feedback received, we made the following changes to this section regarding consent:</p> <ul style="list-style-type: none"> • Consent and not approval to cross is required from the pipeline licensee. This includes notifying the licensee seven days before the planned crossing. The licensee must also respond within the same seven days. • Additional details regarding when consent is not required for vehicular crossings were added. • Consent used to ensure communication between the person proposing to cross the pipeline and the licensee of the pipeline. • Clarified the types of vehicles that do not require consent to cross the pipeline, including chassis rating.

Stakeholder Feedback – Issue	Rules Section	AER Response
		<p>We do not wish to define agricultural operations to keep the requirement flexible. Clarification can be requested from the AER on a case-by-case basis.</p>
<p>The hand excavation requirement should be changed from 0.5 to 0.6 m to align with the <i>OHS Code</i>.</p> <p>Current hand excavation practice is 1 m on each side and a depth of 15 cm below. Added stringency may also mean added operator cost.</p> <p>What is meant by exceptional situations?</p>	<p>Exposing pipeline</p>	<p>We provided additional details on how pipelines should be exposed, including the distance from the pipe at which hand exposure is necessary. We updated the hand excavation requirement to 0.6 m to align with the <i>OHS Code</i>.</p> <p>The proposed requirements were added to ensure existing pipelines are exposed safely and without damage. When conducting ground disturbance activities, hand excavation provides effective visual monitoring and orientation of the pipe to confirm its actual location.</p> <p>If hydrovac or air excavation is used, then the pipe manufacturer's recommendations for such excavation techniques are to be followed.</p> <p>We cannot provide an exhaustive list of exceptional circumstances. Licensees and operators can contact us to consider exemptions.</p>
<p>Part 5 Warning Signs</p>		
<p>Review this against CSA requirements.</p>		<p>We made editorial changes to reflect CSA requirements and increase clarity. In some cases, the new requirements are more specific. Such changes are warranted, given the intent of some clauses.</p> <p>We made the following changes to schedules 1 and 2:</p> <ul style="list-style-type: none"> • Schedule 1 was updated to clarify signage requirements, including more specific categories for the substance being carried. These changes are not retroactive. However, when other mandatory signage updates are required, these new signage requirements can also be made. • Schedule 2 was updated to remove the reference to facility and replace it with pipeline installation to avoid confusion with other terminology used in facility assets.

Stakeholder Feedback – Issue	Rules Section	AER Response
Part 6 Changes to Pipeline		
<p><i>Proactive AER change</i></p>	<p>Liner and internal protection installation (formerly Liner installation)</p>	<p>We made the following changes to this section:</p> <ul style="list-style-type: none"> • Added new terms expanded liner and freestanding liner for clarity. • Included internal protection such as thin-film internal coating. An application will now be required to apply a thin-film coating to an installed pipeline.
<p><i>Proactive AER change</i></p>	<p>Liner and internal protection installation in sour service (formerly Liner installation in sour service)</p>	<p>We added internal protection, such as thin-film internal coating, as this can also be applied to a pipeline in sour service.</p>
Part 7 Relocation or Alteration of Pipeline or Other Regulator Direction		
<p>We need flexibility regarding notification to landowners and occupants.</p> <p>Municipalities are not specifically mentioned for engagement but should be.</p>	<p>Application for direction under section 33 of the Act</p>	<p>We made no changes to this section.</p> <p>Engagement requirements are consistent with <i>Directive 056</i> and are outside the scope of this project. Municipalities may register a statement of concern like any other affected party once an application is filed.</p>
Part 8 Release of Product and Contact Damage		
<p><i>Proactive AER change</i></p> <p>What do you mean by mechanical damage?</p> <p>Clarify what type of pipeline this applies to. Is it consistent with the <i>Pipeline Act</i>?</p>	<p>Report of leak, break or contact damage</p>	<p>We added contact damage as it is also reportable under the <i>Pipeline Act</i>.</p> <p>We removed the term “mechanical damage” and replaced it with “contact damage” (see Interpretation). Contact damage is also reportable under the <i>Pipeline Act</i>.</p> <p>We made the following changes to this section:</p> <ul style="list-style-type: none"> • Pipeline releases that occur during pipeline installation and which meet certain criteria will be exempt from reporting. The exemption is based on volume and aligns with the reporting requirements for facility assets, which follow the <i>Oil and Gas Conservation Rules</i> criteria. The change reduces the reporting burden on the industry yet maintains reporting of releases truly related to pipeline operation.

Stakeholder Feedback – Issue	Rules Section	AER Response
		<ul style="list-style-type: none"> The term “completed pipeline” was changed to “installed pipeline” to match changes to the terms and definitions in Interpretation. <p>Added a new clause enabling us to require a licensee to perform an activity, such as conducting an inspection, test, or engineering assessment, if a leak, break, or contact damage occurs. This aligns with current practice and is now formalized in the <i>Rules</i>.</p>
<p>Is gas defined? You need to clarify the clause and expectations.</p> <p>Specify the volume and concentration released.</p> <p>Define clean gas.</p>	<p>Intentional release of gas</p>	<p>We have specified natural gas. Also, we made editorial changes to clarify the requirements and ensure alignment with <i>Directive 060: Upstream Petroleum Industry Flaring, Incinerating, and Venting</i>.</p> <p>The intent is to prevent off-lease odours, so we will not specify a volume or concentration.</p> <p>Also, we will not define clean gas other than as described in the first clause. If it's too specific, licensees will meet those requirements, and anything slightly more or less could still cause a problem but not meet the intent of the clause.</p>
<p>Part 9 Discontinuance, Abandonment, Removal or Resumption</p>		
<p>The original draft has requirements to purge, isolate, disconnect, etc., the line within 60 days or per the licensee's IMP. Is 60 days enough, or should it be determined by the licensee's SLMS or procedures?</p> <p>Define normal operation, temporarily, and short periods of time.</p> <p>General clarification needed on the approach.</p>	<p>General</p>	<p>We reorganized the section to group the various licensee activities (i.e., operate, discontinue, and abandon). Also, we removed prescriptive requirements for isolation, purging, protection, etc., to reflect different pipelines and the need to maintain the pipeline as per the principles of the IMP.</p> <p>We updated the timeframe for licensees to act regarding inactive pipelines from 12 to 24 months. This timeframe provides sufficient time for licensees to plan future activities (e.g., discontinue, abandon, or return to service). However, licensees must maintain inactive pipelines according to their IMP. Updating the active flowing service approach simplifies the requirements and provides licensees flexibility, so long as the licensee properly manages the pipeline as per the SLMS and IMP.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Recommend providing an option to apply for an extension.</p> <p>Requirements should be within the licensee's SLMS.</p>	<p>Duty to maintain and manage as operating</p>	<p>The 24 months is an extension of 12 months from the previous requirements.</p> <p>The IMP is developed under the umbrella of the SLMS, so no changes are required.</p>
<p>Are tagging and marking requirements necessary? They are quite onerous.</p> <p>Discontinued lines should not need permanent tagging on pipeline ends and should be maintained like an operating pipeline.</p>	<p>Discontinuance or abandonment of entire pipeline system</p>	<p>This section applies to an entire pipeline system rather than segments. Underground tie-ins do not need to be removed as this would be a significant burden for licensees. However, notifying the AER of discontinuance or abandonment and all other discontinuance and abandonment requirements in Part 9 is still required.</p> <p>We removed the proposed tagging requirements. We believe tagging is beneficial and encourage its use.</p>
<p>Abandonment and discontinuation don't have consistent notification processes. Update <i>Directive 056</i>.</p> <p>Extend notification period to 6+ months unless a licence is transferred to a new licensee. There is no risk to the public or environment to go beyond 90 days if the pipeline has been properly discontinued or abandoned. Strictly administrative.</p>	<p>Discontinuance or abandonment of entire pipeline system</p>	<p>We will not increase the notification period because licensees often forget to update the licence. Ninety days is sufficient time to notify the AER.</p> <p><i>Directive 056</i> will be updated to ensure alignment with the changes made in the <i>Rules</i>.</p>
<p>Why 200 kPa? Pressure retaining is defined as 15 psi or 103 kPa.</p> <p>Remove fresh water from acceptable purging methods.</p> <p>Remove operating from well. This requirement applies to any well regardless of its status.</p> <p>Are the tagging requirements necessary?</p> <p>Include freezing in alignment with the CSA.</p> <p>Clarify what cleaning methods are acceptable.</p>	<p>Conducting discontinuance</p>	<p>We reorganized this section into a logical order and grouped requirements for clarity, highlighting protection against internal and external corrosion as these are the two leading causes of releases. The addition to amend the licence, which is the current practice, was included to ensure completion of this activity.</p> <p>We made the following revisions:</p> <ul style="list-style-type: none"> • Revised remaining pressure limitation to 103 kPa. • Removed the word “operating” from in front of well. • Removed the proposed tagging requirements. We believe tagging is beneficial and encourage its use. • Revised the requirements respecting using fresh water to purge a pipeline, which can be an appropriate substance in certain

Stakeholder Feedback – Issue	Rules Section	AER Response
		<p>circumstances. The licensee should take freshwater corrosion into account in their IMP.</p> <p>We did not make the following suggested changes:</p> <ul style="list-style-type: none"> • Adding freezing, which as a consideration for the entire pipeline system and it should be incorporated in the licensees’ overall IMP. • Providing examples of cleaning methods, which depend on the circumstances of the line.
<p>No need to maintain a gas blanket for an abandoned pipeline. The final step should be to purge without being pressurized with any fluid. Delete related requirement.</p> <p>Remove operating from well. The requirement applies to any well regardless of its status.</p> <p>Remove requirement to cut off pipeline risers at pipeline level. This should be addressed in the licensee's IMP.</p>	<p>Conducting abandonment</p>	<p>We reorganized this section into a logical order and clarified changes to the requirements, including properly abandoning a pipeline. We made the following revisions:</p> <ul style="list-style-type: none"> • Clarified that a gas blanket is not required. • Removal of surface equipment requirements was updated to accommodate and incentivize the future Area Based Closure program. • Addition to amend the licence, which is the current practice, but we included it to ensure completion of this activity. • Abandoned lines should only be recommissioned under exceptional circumstances. • Abandoning pipeline risers should be managed in the licensee's IMP. • Removed the word “operating” from in front of well. • Amended requirement to cut off pipeline risers at the pipeline level to accommodate other suitable practices.
<p><i>Not included in the initial draft for stakeholder feedback</i></p>	<p>Mandatory abandonment</p>	<p>New section created that includes requirements from the current edition of the <i>Rules</i>.</p> <p>Grouped existing requirements for clarity.</p> <p>This is different than conducting abandonment as this is stipulated by the regulator to perform this activity.</p>

Stakeholder Feedback – Issue	Rules Section	AER Response
<p>Consider extending the 30-day timeframe to remove pipe and equipment from the right-of-way.</p> <p>Clarify that pigging and cleaning should be done prior to removal.</p> <p>Clarify what cleaning methods are acceptable.</p> <p>Are tagging requirements necessary?</p>	<p>Conducting removal (formerly Removal of pipeline)</p>	<p>We clarified the requirements in this section. The removal process will now follow the same process as discontinuance and abandonment to ensure consistency and reduce the administrative burden on licensees. A preapproval process is not required. Instead, the licensee will perform the removal and then notify the regulator to amend the licence. Licensees have 60 days to remove pipe and equipment from the right-of-way.</p> <p>We have not clarified cleaning methods as they are based on the licensee’s specific circumstances.</p> <p>We removed the proposed tagging requirements. We believe tagging is beneficial and encourage its use.</p>
<p>Requirements need to consider short outages that occur frequently. Recommend that this be defined by the licensee's IMP.</p> <p>An engineering assessment should only be required if past the allowable timeframe for resuming operation of an inactive pipeline.</p>	<p>Resumption of pipeline operation</p>	<p>The proposed requirements allow licensees up to 24 months to either discontinue, abandon, or resume a pipeline. Furthermore, the definition for active flowing service already accounts for short outages.</p> <p>We removed the engineering assessment requirement for determining resumption suitability if resumption is within 24 months. Application requirements for resumption, including the engineering assessment, will reside in <i>Directive 056</i>.</p>