

City of Edmonton

Oil and Gas Facilities Policy Review

Implementation Plan

Approved by Council

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Table of Contents

1.0 Roles and Responsibilities

- 1.1.1 Oil and Gas Liaison Officer
- 1.1.2 Internal Processes
- 1.1.3 Multi Party Working Group
- 1.1.4 Stakeholder Cooperation

2.0 Public Safety

- 2.1 Setbacks
- 2.2 Risk Assessment
- 2.3 Reporting Incidents to the ERCB
- 2.4 Public Awareness
- 2.5 Enforcement

3.0 Planning Process and Tools

- 3.1 Area Structure Plan (ASP) and Neighbourhood Structure Plan (NSP) Processes
- 3.2 Circulation Processes and the ERCB
- 3.3 Suspended Wells
- 3.4 Abandoned Wells
- 3.5 Nuisance Effects

4.0 Building Internal Capacity

5.0 Pipeline Policy Review

Executive Summary

The rapid expansion of Edmonton's urban development into areas with significant existing oil and gas activity, combined with an influx of new oil and gas activity in or near Edmonton, has led to increased conflicts over land use.

In response to this land use conflict, the City of Edmonton (City of Edmonton) commissioned RMC & Associates and Gecko Management Consultants to undertake a study of the policy framework that governs the interaction between oil and gas activity and urban development in and around the City. The goals of this study were to:

- gain a better understanding of the issues of co-existence facing Edmonton;
- gain a better understanding of the City's scope of control over the issues; and
- present policy, process and communication recommendations for better managing these challenges.

The Consultant's research included a review of existing provincial legislation, municipal policies and procedures, and previous Energy Resources Conservation Board (ERCB) decisions related to oil and gas activity near urban areas. Stakeholder workshops, surveys, and telephone interviews were also conducted to better understand the issues and challenges that the City of Edmonton faces, and will continue to face, with respect to managing the co-existence of oil and gas activity and urban development.

The outcomes of the Consultants' work include several recommendations as to how the City of Edmonton can improve:

- its existing oil and gas policies;
- the review process for both planning and oil and gas licensing applications; and
- communication between stakeholders affected by oil and gas facilities.

The Consultants' recommendations formed the foundation for in depth discussions with the Stakeholder Advisory Committee. While some of the recommendations are within the scope and authority of the City of Edmonton, many of them require collaboration with other levels or agencies of government, industry and possibly other municipalities.

This Implementation Plan, developed by the Project Team working closely with the Stakeholder Advisory Committee, includes a set of actions to be implemented by the City of Edmonton in cooperation with the ERCB, the oil and gas industry, the development industry and other stakeholders. Its goal is to strengthen the

ability of the City of Edmonton to minimize and manage the land use impacts from current and future oil and gas development. It therefore proposes a variety of actions to take advantage of available opportunities to exercise a positive influence on decisions that will impact the co-existence of urban development and oil and gas activities.

Summary of Implementation Plan Recommendations

The Implementation Plan has been broken down into four separate categories that identify groups of issues that can be affected by the City of Edmonton either independently or in collaboration with other stakeholders. These include:

- Roles and Responsibilities
 - Establish an Oil and Gas Liaison Officer
 - Establish a Multi-Stakeholder Working Group, and continue to work co-operatively
 - Clarify processes
- Public Safety
 - Setbacks
 - Environmental Impact Assessments and Risk Assessments
 - Enhance public awareness
 - Enforcement
- Planning Process and Tools
 - Incorporating oil and gas co-existence issues into land use plans and planning processes
 - Requirements in urban areas regarding abandoned wells, suspended wells and nuisance effects of operating wells
- Building Internal Capacity
 - Information exchange and access to data
 - Understanding complementary roles and responsibilities
- Pipeline Policy Review

Each has components of improving City policy, process and/or communications. The implementation of the items in this plan will assist the City of Edmonton to understand and work towards better addressing the issue of the co-existence between urban development and oil and gas facilities in and around our urban boundaries. This will benefit not only the City of Edmonton, but other stakeholders as well.

1.0 Roles and Responsibilities

Background

Higher oil prices, improved extraction technologies and the rapid pace of urban development are combining to create greater conflict between the demands of urban growth and the needs of oil and gas activity. The former of these is the purview of the municipality; the latter is within the jurisdiction of Alberta Energy and the ERCB.

In addition to public safety, the major decision-makers have more specific roles including the following:

- Alberta Energy
 - tenure (i.e. marketing) of sub-surface mineral rights.
- Energy Resources Conservation Board
 - process oil and gas facility license applications, including consultation requirements and hearings, if necessary;
 - regulate operation of oil and gas facilities, including approval of emergency response plans (ERPs), enforcement of setbacks of oil and gas facilities from development.
 - inspect oil and gas facilities / activities, ensure compliance and enforcement as necessary.
- City of Edmonton
 - adopt land use plans and process planning applications (including consultation with community leagues, local synergy groups and nearby landowners);
 - approve subdivisions and issue development permits;
 - enforce setbacks of urban development from oil and gas facilities.
- Oil and Gas Operators
 - secure interest in both the sub-surface mineral rights and surface rights to access the resource;
 - comply with ERCB requirements for consultation and facility development and operation;
 - notify ERCB and occupants of the EPZ of incidents and take appropriate action.
- Land Development Companies
 - propose area structure plans and neighbourhood structure plans for new urban development areas, including assessment of constraints

posed by oil and gas facilities;

- comply with setback policies in designing subdivisions;
- comply with applicable requirements or restrictions of oil and gas companies for crossing permits and access to lease areas.

Each of these and other stakeholders – the oil and gas operators, the land developers, Capital Health Authority, Community Leagues, residents – has its own interests. Sometimes, the interests are compatible, but often they are not. Once established, both a residential subdivision and an oil or gas facility are persistent land uses, destined to exist for many years. Clearly, the co-existence of these activities, where they occur in proximity, is of importance to all stakeholders for reasons of public safety, quality of life, nuisance mitigation, sound land use planning and financial viability of land development and energy companies.

Achieving these objectives will be enhanced by:

- an improved understanding among all stakeholders of each others' roles and responsibilities, and
- having clearly defined mechanisms and processes for communicating, coordinating and consulting on the complex aspects of co-existence.

The recommendations of the Consultants include:

- the establishment of an Oil and Gas Liaison Officer within the City administration;
- the creation of a clear internal process for the City to use in reviewing oil and gas applications;
- the creation of a multi-party working group; and
- advocacy to ensure a voice or greater influence in the oil and gas decisions that would impact or be impacted by City land use plans.

These recommendations were generally favored by the Stakeholder Advisory Committee. However, the Committee did not support elimination of the City of Edmonton consultation process, thought by the Consultant's to be a duplication of consultation activity that the ERCB requires of the applicant oil and gas companies.

Recommendations

- 1.1.1 That the City of Edmonton establish a role of Oil and Gas Liaison Officer to act as a point person to coordinate communications, develop educational materials and build understanding on both sides of the co-existence issue and involving:

- Internal City departments (Planning and Development, Office of Emergency Preparedness, Emergency Response, Transportation, etc.)
 - City Council
 - Provincial Legislators (e.g. Alberta Municipal Affairs and Housing, Alberta Energy, Alberta Environment, Alberta Health)
 - Oil and gas industry decision-makers and regulators (ERCB)
 - Capital Health Authority
 - Alberta Environmental Network
 - Community Leagues (EFCL)
 - Local synergy groups
 - Landowners and other residents (tenants)
 - Business owners
 - Land development industry (UDI) and Homebuilders (EHA)
 - Oil and gas industry (companies and their associations, e.g. CAPP; EAUPOC)
 - Other Municipalities
- 1.1.2 That the City of Edmonton establish a clear and formalized internal process for reviewing applications involving oil and gas facilities. Aspects to be addressed include:
- A single point of entry for oil and gas applications (i.e. the Oil and Gas Liaison Officer)
 - The requirements and mechanism for review by other City departments (electronic / inter-departmental mail / review committee, etc.)
 - The need for and means of City consultation with affected residents
- 1.1.3 That the City of Edmonton establish a multi-party working group, to meet 2 to 3 times each year. Administration will develop a Terms of Reference for this group with the major functions that include:
- Refine and carry out the recommendations of this Implementation Plan, and monitor its achievements
 - Keep current on relevant activities, policies, regulations and legislation and share information in a readily useable form
 - Develop information such as a brochure and web product to educate and inform the public of the existence / location of oil and gas facilities, the potential impacts of them, safety features, and the specific contacts for additional information and for emergencies
 - Address emerging issues of co-existence and provide periodic recommendations to the City.

The membership should include: City department representatives, including the Oil and Gas Liaison Officer; oil and gas industry representatives (CAPP); Alberta Environment; ERCB; CHA; UDI; Canadian Homebuilders Association; EFCL; Alberta Environmental Network; EAUPOC, and at least two members of the public from communities affected by oil and gas activity, to be selected through a recruitment process.

Guidance and / or potential models can be sought from: Synergy Alberta; various petroleum operators' groups, such as Sundre or Rimbey; and Community Awareness and Emergency Response (CAER).

1.1.4 That the City of Edmonton work cooperatively with other stakeholders to address the following issues, whether through amendments to applicable legislation or regulations, or other means:

- Early consultation and involvement of oil and gas operators during the preparation of ASPs and NSPs
- Clarification of roles and expectations in the referral of applications to yield better information for evaluating land use plans
- The need for mandatory minimum setbacks of development around abandoned facilities
- Intermunicipal consultation where oil and gas facilities will have a long life span and are near a municipal boundary
- Timelines for the abandonment of facilities, and time limits for maintaining a well in suspended status, both in conjunction with the timing of urban development
- The adequacy of ERCB minimum setbacks in all instances to mitigate nuisance impacts on urban development
- Compilation and distribution to the development industry of all legislative and regulatory requirements relevant to ground disturbance (i.e. Pipeline Act, Alberta First Call, Oil and Gas Regulations, etc.).

2.0 Public Safety

2.1 Setbacks

Background

Minimum setbacks for oil and gas facilities from development were created by the Energy Resources Conservation Board (ERCB) to deal with safety issues as well as the mitigation of nuisance, noise and smell. The current City of

Edmonton policy guidelines allow for setbacks that are less than that required by the ERCB regulations. The City of Edmonton (City of Edmonton) no longer has the authority to grant a setback less than ERCB setback, but may request a greater setback if deemed necessary.

The Consultants' report recommends that the City of Edmonton create an updated policy to adopt the current ERCB minimum setback distances from public facilities and public dwellings.

Recommendations

- 2.1.1 That the City of Edmonton amend its policy to adopt the current ERCB minimum setback distances from public facilities and permanent dwellings as the required minimum setback distances.
- 2.1.2 That the City of Edmonton apply the minimum ERCB setback to all urban development, and that the setback be measured from the property line of the proposed development to the well head, or battery equipment.
- 2.1.3 That the City of Edmonton may require an Environmental Impact Assessment and on the basis of its findings, may require a setback larger than the minimum.

2.2 Risk Assessment

Background

There is some apprehension about using the standard ERCB setback (i.e. a minimum of 100m in most instances in Edmonton) for all co-existence situations. Most stakeholders were of the opinion that there should be some mechanism for increasing the minimum setback in some circumstances.

The Consultants' report recommends the City of Edmonton develop a preliminary screening process to assess risk where new oil and gas development proposals encroach on urban development, or where new urban development proposals encroach on existing oil and gas facilities. In addition, more detailed risk assessments should be required for certain circumstances for new proposed oil and gas facilities near residential development or for new urban development near existing oil and gas facilities.

Recommendations

- 2.2.1 That where the operating (not drilling) risk profile of a proposed facility is identified as above the established limit (using the ERCB risk model), the City of Edmonton should request that the oil and gas company:

- undertake a more detailed risk assessment to determine the risks associated with the operation,
- explain how the facility will integrate with existing and future development in the area, and
- propose mitigation measures to minimize potential negative effects from the operation.

Based on the findings of the risk assessment, the City of Edmonton may request that the ERCB require a greater setback distance.

- 2.2.2 That where urban development activities are proposed within twice the setback distance from a facility, the City of Edmonton request that the developer undertake a more detailed risk assessment, utilizing the requirements developed by the City.

This assessment would be used by the City of Edmonton to determine whether or not the development should be subject to a greater setback distance, and if additional mitigation measures should be integrated into the development.

- 2.2.3. The requirements for the preparation of EIAs, including risk assessments, will be developed by the Multi Party Working Group.

2.3 Reporting Incidents to the ERCB

Background

Both the City of Edmonton and Capital Health need to be able to recognize a non-emergency, non-compliance situation between the oil and gas industry and urban development (I.e. parking heavy machinery on pipelines, digging or constructing near facilities, etc.). If any specific issues with this procedure are identified, they should be resolved with the ERCB.

Residents in the vicinity of oil and gas facilities are concerned with occasional releases of H₂S (hydrogen sulfide) that they report before they are detected by the company and reported to the ERCB. The Consultant's report recommends that the City of Edmonton consult with the ERCB to clarify the emergency incident notification process.

The long term health effects of exposure to low levels of H₂S on adjacent residents are also of concern. Some studies have been completed and others are under way. As yet, the outcome is not clear.

Recommendations

2.3.1 That the City of Edmonton staff work with ERCB staff to:

- provide clarification of both the emergency and non-emergency incident notification processes instituted by the ERCB, and
- provide training and information to City of Edmonton staff and the Capital Health Authority on these procedures.

2.3.2 That the City of Edmonton request the ERCB to review and assess the need for:

- permanent, on-site, well head monitoring of H₂S levels for well and battery sites in or adjacent to urban areas of the City; and
- periodic monitoring reports to be provided to the Oil and Gas Liaison Officer.

2.3.3 That the City recognize the ERCB's March, 2007 Public Safety and Sour Gas Final Report, and supports the recommendation that the health effects of H₂S be studied further.

2.4 Public Awareness

Background

The general public may have questions and concerns regarding oil and gas facilities in their neighbourhood and the potential for an incident to occur. The current practice is that the developer provides an information brochure for new homeowners when they purchase their house. However, when these homeowners sell the house, they are not obliged to pass this brochure onto the next owner. In some cases, the information is provided to the homebuilder who may not always pass it on to the purchaser.

Recommendations

2.4.1 That an Oil and Gas Liaison Officer be appointed by the City to:

- provide information on safety and urban design considerations to the development industry to reduce the potential for incidents throughout the neighbourhood design, construction and marketing process;
- elevate the level of public awareness to focus on preventative measures;
- regularly communicate with oil and gas operators to both inform them of the City's long term land use plans as well and obtain information on oil and gas activity in the area including open houses and public

information programs;

- prepare information brochures and update them as needed with information about existing oil and gas activities in affected neighbourhoods;
- identify means of distribution to ensure that all residents, whether owners or renters, have access to the brochures and significant updates; and
- work with the ERCB and oil and gas industry to compile, summarize and distribute legislation relevant to ground disturbance.

2.4.2 That the Oil and Gas Liaison Officer encourage developers and homebuilders to voluntarily display brochures and maps in residential show homes with information about oil and gas facilities in the neighbourhood, and ensure that these brochures and maps are updated and restocked as needed.

2.5 Enforcement

Background

The volume of oil and gas activity throughout the Province has made it increasingly challenging for the ERCB to monitor all oil and gas company activities. Various stakeholders are concerned that the ERCB facility license requirements are not being adhered to in new developments built in proximity to existing oil and gas activity. There may also be confusion regarding who is responsible if the requirements are not upheld and something goes wrong

Oil and gas operators have sometimes found it difficult to access lease sites or ensure proper maintenance of facilities in newer neighbourhoods because of inadequate inter-party communication between stakeholder groups (oil and gas operators & developers). Early communication is necessary.

The Consultants' report recommends the City of Edmonton examine the feasibility of establishing a mechanism to ensure both land developer and oil and gas industry compliance with minimum development setback distances and other ERCB license requirements.

Recommendations

2.5.1 That the City of Edmonton ensure that:

- City policies regarding setbacks of urban development are enforced through planning and other processes within its jurisdiction, and

- penalties for non-compliance are developed, publicized and applied.
- 2.5.2 That the ERCB ensure that adequate local resources, including staff, are available to enforce their requirements for oil and gas facility development and operations.

3.0 Planning Processes and Tools

3.1 Area Structure Plan (ASP) and Neighbourhood Structure Plan (NSP) Processes

Background

Oil and gas operators are not always aware of encroaching urban development in areas where they have existing facilities. This makes it difficult for them to plan for, and address operational and safety concerns, potential nuisance concerns and issues of access with developers in advance of construction.

Conversely, the development industry is aware of existing oil and gas facilities, but they are generally not aware of the long term business plans of the operators in an area. The City of Edmonton requires land developers to identify local oil and gas operators and facilities in their development applications, but they are not required to inform or consult with oil and gas operators or holders of the mineral rights in the development of ASPs and NSPs.

The Consultants' report recommends that the City of Edmonton develop a formalized process to facilitate the involvement of oil and gas operators, mineral rights holders, the ERCB and all landowners in the ASP and NSP phases of land use planning. This would improve communication between oil and gas operators, the development industry and the City Planning and Development Department. The Consultants' report further recommends that the City require ASPs and NSPs to have land use planning strategies for managing the co-existence of oil and gas activities with urban development, even if there currently is not activity in the area.

Discussion with the Stakeholder Advisory Committee suggests that the City of Edmonton should facilitate communication between land developers and oil and gas operators and mineral rights holders as part of the ASP and NSP planning process. More specific suggestions include:

- requiring the ASP and NSP to have a development staging plan based on the operation or closure of resource operations, and
- requiring that the Bylaw map passed by council include resource operations so it is more obvious to the general public.

Recommendations

- 3.1.1 That the City of Edmonton develop a formalized process to facilitate the early involvement of oil and gas operators, mineral rights holders, the ERCB and all landowners in the ASP and NSP phases of land use planning
- 3.1.2 That ASPs and NSPs have land use planning strategies for managing the co-existence of urban development with operational, suspended and abandoned oil and gas facilities.
- 3.1.3 That the oil and gas industry be informed of existing long term land use plans and their options for contact with City Planners.

3.2 Circulation Processes and the ERCB

The City of Edmonton circulates all ASP, NSP and rezoning applications near existing oil and gas activity to the ERCB for review and comment as required by the Municipal Government Act. In forwarding these applications, the City is looking for an expert opinion as to whether it is safe and advisable to allow urban development in the proposed location.

However, the ERCB has no directive as to the type of information to provide to municipalities. They generally respond with the following information:

- whether or not there are any oil and gas facilities in the area and the associated setback, and
- the number, location and classification (i.e. Level 1, Level 2, etc.) of any facilities.

Further, with the rapid pace of development, the ERCB is challenged in responding to the number of such applications they receive from municipalities across Alberta.

The Consultants' report recommends that the City of Edmonton work with the ERCB and other Provincial agencies to improve the referral process for development applications to clearly identify what the City's information needs are. It also recommends that a standardized format and process be developed to determine which ASPs, NSPs and Zoning applications need to be referred to the ERCB.

The Stakeholder Advisory Committee suggests that the City needs to be clear about what the ERCB's role is, and the ERCB needs to understand what they are being asked in these circulations. One suggestion was that the ERCB should assess the impact of the plan on oil and gas activity in the area. The Committee also recommended that only new ASPs and NSPs, as well as plan amendments, in the vicinity of facilities need be referred to the ERCB.

Recommendation

- 3.2.1 That the City of Edmonton work with the ERCB and other Provincial agencies to:
- clarify expectations of the City and each external agency in assisting the City to assess the impact of oil and gas facilities on proposed urban development, and
 - clearly identify the form, content and process for referrals.

3.3 Suspended Wells

Background

There is currently no requirement for well owners to abandon and reclaim their wells within a specified time period, resulting in a large number of suspended facilities within and around the City of Edmonton. Suspended wells still require a minimum 100 m setback, but can be re-entered. The City has no authority to request the abandonment of these facilities.

The Consultant's report recommends that the City of Edmonton work with the ERCB to:

- review timing and abandonment criteria in and around urban areas to determine whether or not additional requirements could be established;
- create new re-entry processes for suspended wells within urban areas, including consultation requirements.

The Stakeholder Advisory Committee supports these recommendations and suggests that the City ask the ERCB to require more frequent re-evaluation of the viability of suspended wells in urban areas. Other suggestions included a Province-wide standard timeline for abandoning wells if left suspended for too long.

Recommendations

- 3.3.1 That the City of Edmonton work with the ERCB and oil and gas operators to review abandonment criteria for suspended wells in and around urban areas.
- 3.3.2 That the City of Edmonton work with provincial officials and the ERCB to evaluate the need for new re-entry processes for suspended wells in urban areas that include the requirement for consultation with the municipality and public education for residents.

3.4 Abandoned Wells

Background

The ERCB has established a recommended setback from abandoned well sites intended to ensure sufficient area to access and set up equipment to complete repair activities, if and when required. The area is designated a 10m x 15m work area surrounding the well with an 8m access corridor to the setback area. This setback area is integrated into new developments at either rezoning or subdivision stage, but there are no consistent municipal requirements for how this should be done.

The Consultants' report recommends that the City of Edmonton develop process guidelines for the treatment of abandoned facilities.

Discussion with the Stakeholder Advisory Committee suggests that abandoned wells should not be located on private residential property, and that parks or roadways (i.e. more open areas) are preferred to allow for the adequate movement of repair equipment on the abandoned well site. This means that the City would assume the responsibility for surface maintenance of abandoned wells sites on City property.

Recommendation

- 3.4.1 That the City of Edmonton establish consistent neighbourhood design guidelines to facilitate the integration of abandoned wells into neighbourhood development.

Also see Recommendation 3.3.1

3.5 Nuisance Effects

Background

In addition to using setbacks to mitigate nuisance effects, the ERCB directs operators to use noise reduction mitigation measures (e.g. specialized equipment mufflers, acoustical screening). ERCB Directive 38: *Noise Control Directive User Guide* establishes acceptable noise levels at residences in proximity to oil and gas facilities. Also, the release of odours to the environment is strictly prohibited by the ERCB.

The City of Edmonton also has guidelines to address nuisance effects such noise, odours, traffic and surface improvements around facilities. These are contained in the City's 1985 "Policy Guidelines for the Integration of Resource Operations and Urban Development and Guidelines for Surface Improvements". The Consultants' report recommends that the City maintain these guidelines and

work with oil and gas operators, ERCB and the development industry to help increase awareness and compliance with these guidelines.

The Stakeholder Advisory Committee suggests that some of these Guidelines should be modified to improve functionality for operators within the lease area (e.g. landscaping) but also include more specific features such as easy to read signage, specific landscaping and lighting requirements.

Recommendation

- 3.5.1 That the proposed multi-party working group review and implement changes to the City's nuisance management criteria policies to make the guidelines functional for all affected stakeholders.

4.0 Building Internal Capacity

Background

Oil and gas facilities have major implications for public safety and for land use. The ERCB has jurisdiction over oil and gas activity, however, the MGA gives the mandate to manage land to the municipalities. Oil and gas activity is largely incompatible with many urban land uses. Therefore there is a need to ensure that the development of infrastructure and oil and gas resources is balanced with protecting the health, safety and interests of residents.

City of Edmonton has staff in various functional areas to ensure sound planning and public safety (e.g. emergency response, planning and development, transportation, subdivision approval and permitting). Staff members have varying degrees of knowledge and skill in the field of oil and gas. The study recommends building internal capacity by strengthening knowledge of ERCB regulations and the oil and gas industry, and by improving access to information on oil and gas facilities. The Stakeholder Advisory Committee concurs.

Recommendations

- 4.1.1 That City of Edmonton staff:

- have a basic understanding of the oil and gas industry and the implications of such information on neighbourhood planning and subdivision processes;
- be provided with a simplified interpretation of ERCB regulations, up-to-date information on activities, and new applications;
- know when a property contains oil and gas facilities and how to access specific detailed information about them;

- understand the different but complementary roles and responsibilities of the all agencies mandated to ensure public safety with regard to oil and gas industry in the City;
 - have access, through the Oil and Gas Liaison Officer, to an up-to-date database of information on the location, status, and ownership of all existing oil and gas facilities in and near the City.
- 4.1.2 That the Oil and Gas Liaison Officer organize information exchange sessions between planning staff and ERCB staff to discuss matters related to planning processes and ERCB regulatory requirements.

5.0 Initiate a Pipeline Policy Review

Background

During the process of evaluating the Consultant's recommendations and developing a draft Implementation Plan, it became apparent to the Stakeholder Advisory Committee that many of the recommendations from the Implementation Plan could also be applied to pipelines, even though the legislation regulating pipelines is very different from that regulating oil and gas facilities. Dialogue with the Edmonton Area Pipeline and Utility Operators Committee (EAPOUC) has verified the need to better address the issue of co-existence between pipelines and urban development as pipelines have unique issues and considerations.

In early December, 2007 the Province released the Capital Region Integrated Growth Management Plan (CRIGMP). One of the Core Infrastructure supporting documents included pipelines. The Province's stated purpose of the pipeline study in relation to the CRIGMP was to assess the existing pipeline public sector infrastructure against likely future pipeline grow scenarios, identify any gaps, and make suggestions to deliver the necessary infrastructure to fill the gaps and support the anticipated growth.

The Project Team recommends that a pipeline policy review become the second component of the Oil and Gas Facilities Policy Review Project – the outcomes of which would be implemented at a later date. Coordination with the Province in light of the Regional Plan will become a vital component of the pipeline policy review.
