

# Conservation and Reclamation INFORMATION LETTER

---

## Ploughed-In Pipelines

### BACKGROUND

Alberta Environment and Alberta Sustainable Resource Development strongly encourage the development and use of techniques that minimize land disturbance. Small-inch diameter pipelines (less than 4-inch) are increasingly being installed by plough-in operations, instead of the traditional trenching. More recently, equipment advances have led to pipes up to 6-inches in diameter being ploughed-in.

Generally this method is thought to minimize disturbance, in particular because there is no need for topsoil stripping, subsoil excavation, soil replacement, and revegetation. As such, ploughed-in pipelines have been accorded special regulatory treatment, including:

- Exemption from the requirement to obtain a reclamation certificate; and
- Exemption in the *Activities Designation Regulation* from the requirement to obtain an approval under the *Environmental Protection and Enhancement Act* (EPEA).

Notwithstanding these exemptions, ploughed-in pipelines are still regulated under EPEA and operators are required to properly conserve and reclaim their rights-of-way.

### CONCERN

Alberta Environment and Alberta Sustainable Resource Development are seeing cases throughout the province where plough-in operations have been carried out:

- with improper equipment – leading to rutting, vegetation disturbance and soil admixing;
- in areas with sharp topographic changes – leading to equipment switches between plough-in and backhoe/trencher;
- under wet weather conditions – leading to rutting, admixing and compaction;
- under frozen operating conditions – leading to large chunks of topsoil/subsoil coming to the surface;
- in rocky soils – leading to rocks on the surface; and,
- in heavy clay soils – leading to large chunks of subsoil coming to the surface.

In recognition of these concerns some operators have started to strip topsoils ahead of the plough-in equipment. While this makes soil conservation sense it negates the reason for the exemption from Class I status, which was limited disturbance. This is particularly true if the stripping is done on native prairie.

### FUTURE ACTIONS

Operators must ensure that plough-in operations are conducted with the right equipment and under the right environmental conditions.

Alberta Environment and Alberta Sustainable Resource Development will continue to monitor the success of this method. If problems continue to be found the Departments will review regulatory options under EPEA, including removing the exemption for ploughed-in lines from the *Activities Designation Regulation*.

### ADDITIONAL REQUIREMENTS

Operators are reminded that all pipelines going through a watercourse with defined bed and banks must comply with the *Water Act's Code of Practice for Pipelines and Telecommunication Lines Crossing a Waterbody*.

Operators are reminded that they are required by the Alberta Energy and Utilities Board's Guide 56 to notify Alberta Environment Inspectors prior to application for an EUB license on private land. Operators should also contact Alberta Environment Inspectors prior to construction.

Operators are reminded that all precautions relating to locating other underground utilities must be followed as per the requirements of the *Pipeline Regulation*.

## CONTACTS

The following can be reached toll free by calling 310-0000 and then dialing the number shown below.

### **For Green Area public lands:**

Alberta Sustainable Resource  
Development  
Public Lands Division,  
3rd Floor, 9915 - 108 Street,  
EDMONTON, Alberta T5K 2G8.

Phone: (780) 427-3570  
Fax: (780) 422-4251  
e-mail: [reclaim@env.gov.ab.ca](mailto:reclaim@env.gov.ab.ca)

### **For White Area public lands:**

Alberta Sustainable Resource  
Development,  
Public Lands Division,  
Room 200, J. G. O'Donoghue Building,  
7000 - 113 Street,  
EDMONTON, Alberta T6H 5T6.

Phone: (780) 427-6597  
Fax: (780) 422-4244  
Website: [www.gov.ab.ca/navigation/  
sustain/publiclands/index.html](http://www.gov.ab.ca/navigation/sustain/publiclands/index.html)

### **For all other lands:**

Alberta Environment,  
Science and Standards Division,  
4th Floor, 9820-106 Street,  
EDMONTON, Alberta T5K 2J6

Phone: (780) 427-5883  
Fax: (780) 422-4192  
e-mail: [land.management@gov.ab.ca](mailto:land.management@gov.ab.ca)