

September 14, 1999

Mr. M. L. Mantha  
Secretary  
National Energy Board  
444 - Seventh Avenue S.W.  
Calgary, Alberta  
T2P 0X8

Dear Mr. Mantha:

**RE: Foothills Pipe Lines Ltd.  
Section 58 Application  
Cooling Water Piping Recoating – Station 369**

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Pursuant to Section 58 of the National Energy Board Act, Foothills Pipe Lines Ltd. ("Foothills") hereby encloses twenty (20) copies of an application to excavate and recoat six of the underground cooling water piping risers at Station 369, Decompression/ Recompression facility at Empress.

It is anticipated that the project will be completed during the fourth quarter of 1999 at an estimated cost of \$104,000. Foothills requests exemption from the Early Public Notification Requirements, as the project will be conducted within existing facilities with no anticipated adverse impact on environmental or socio-economic conditions.

Foothills will post a copy of the application in the Regulatory section of its website at <http://www.foothillspipe.com>. Copies of this letter are being served to Foothills' list of interested parties and paper copies of the filing will be provided upon request.

Should you require any further information, please contact the undersigned at (403) 294-4495 or fax (403) 294-4174.

Yours truly,

*(Original signed by)*

Phil Cochrane  
Senior Supervisor  
Customer Service &  
Regulatory Affairs

CC: Interested Parties TG-6-81

	<u>Section 58 Application</u>	<u>Project Amount (\$000)</u>
<b>Cooling Water Piping Recoat – Station 369</b>	<b>Exempt</b>	<b>104.0</b>

**Description**                      Excavate six cooling water piping risers at Station 369 (Decompression/ Recompression Facility) and apply epoxy coating.

**Justification**                      During the 1998 Eastern Leg Expansion Project, the cooling water piping was installed without proper coating on six underground piping risers. The existing coat of primer is not an effective barrier to corrosion, especially in a below grade environment. This piping is also insulated down to the frost line, thereby shielding areas of corrosion from the station’s impressed current cathodic protection system.

This work is required to maintain the integrity of the cooling water piping at these six locations.

**Environment**                      All construction related to this project will be conducted within existing Foothills facilities and no potential adverse environmental affects are expected.

**Early Public Notification**                      Foothills requests exemption per Part II of the NEB Guidelines, Section 6(1)(b), concerning Early Public Notification as the project will be conducted within existing facilities with no anticipated impact on environmental or socio-economic conditions.

**Socio-Economic**                      The construction, operation and maintenance associated with this project will be conducted by Operations personnel or local contract personnel. This project is not expected to affect regional population, land use, local employment, or the local economy.

**Lands**                                      There are no land requirements since the work will be done within the existing Foothills facilities.

**Anticipated Timing**                      Fourth quarter of 1999.