

August 24, 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
Air System Moisture Analyzer: Station 369**

Pursuant to Section 58 of the National Energy Board Act, Foothills Pipe Lines Ltd. ("Foothills") hereby encloses twenty (20) copies of an application for approval to purchase and install an instrument air moisture analyzer at Compressor Station 369, Decompression/Recompression facility at Empress.

The estimated cost of this project is \$17,800.00. 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>
Air System Moisture Analyzer – Station 369		File	17.8
Description	Purchase and install an instrument air moisture analyzer at Empress Decompression/Recompression facility (Station 369).		
Justification	<p>Site personnel have expressed concern over water in the instrument air system and its detrimental effects on pneumatic equipment and possible loss of control. Although an existing air dryer desiccates the air to a –40C dewpoint, there is no way to confirm if the operation of the air dryer has ceased to function, putting downstream equipment at risk. In the event that the dryer releases some moist air, the moisture analyzer will trigger an alarm and site personnel are notified. Mitigative action can then be taken.</p> <p>This new equipment will prevent the loss of pneumatic control, will increase mean time between pneumatic equipment failures and will reduce maintenance costs.</p>		
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 moisture analyzer will be located within the existing Foothills facilities.		
Anticipated Timing	Fourth quarter of 1999.		