

March 13, 2000

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 – Addendum 1  
Underground Tank Replacement - Compressor Station 367**

Pursuant to Section 58 of the National Energy Board Act, Foothills Pipe Lines Ltd. ("Foothills") hereby submits twenty (20) copies of an application to remove and replace six underground drain tanks at Compressor Station 367 (Jenner).

This project is expected to commence during the third quarter of 2000 at an estimated cost of \$185,000. 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 further submits that this project will be conducted in accordance with the Onshore Pipeline Regulations 1999, all applicable codes and standards, and in adherence to Foothills' approved Environmental Plans and Procedures Manuals for Zone 6, as amended.

Foothills will post a copy of this document on its website [www.foothillspipe.com](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 available upon request.

Yours truly,

*Original signed by*

Phil Cochrane  
Senior Supervisor  
Customer Service  
& Regulatory Affairs

Encl.

Cc: Interested Parties – TG-6-81

## 2000 SECTION 58 APPLICATION

### Zone 6 - Eastern Leg Alberta

	<u>Section 58 Application</u>	<u>Project Amount (\$000)</u>
<b>Replace Underground Drain Tanks – Station 367</b>	<b>File</b>	<b>185.0</b>

**Description**

Remove and replace six underground drain tanks at Station 367.

**Justification**

The existing underground fiberglass drain tanks are experiencing ground water infiltration and no longer provide adequate containment. To minimize the risk of environmental contamination they will be removed and upgraded to underground double wall steel tanks with secondary containment and interstitial leak detection. Installation of new tanks will reduce maintenance and operating costs at this station.

**Environment**

The work will take place entirely within the fenced perimeter of the compressor station and will involve the excavation and removal of tanks presently serving floor drains in compressor, converter, auxiliary and control buildings, as well as the installation and commissioning of replacement tanks.

The existing tanks have been in service since 1982 and over that period were periodically pumped and the contents tested. Based on the buildings served and the results of past chemical analyses, the tanks, at the time of removal, can be expected to contain small quantities of water, lubricating oils, solvents, glycol and cleaning agents.

Excavation, removal and replacement of the tanks will be carried out by an experienced contractor licensed for petroleum tank removal and installation by the Petroleum Tank Management Association of Alberta. Prior to excavation the tanks will be pumped and the contents analyzed to determine if the materials are hazardous wastes under Alberta legislation. During the work, excavated material and the excavation walls will be closely observed to detect soil discoloration or odors suggesting possible contamination. Where contamination is indicated, the excavated materials will be segregated until sample analyses can confirm or eliminate contamination. Samples from the excavation walls and floor will be obtained and analyzed to confirm the absence of contamination. If contaminated material that constitutes hazardous waste under Alberta regulations is present, it will be collected and disposed of in a manner consistent with Alberta regulations. Excavated material that is not contaminated will be retained for use as backfill. Tanks and tanks parts removed from service will be handled in a manner consistent with chemical analyses of tank contents and Alberta regulations. The tank removal contractor will be required to prepare a report documenting the removal and the observations/analyses resulting from the work.

All work necessary to remove the existing tanks and install replacement tanks will be completed by an experienced and accredited contractor under the direction of a Foothills inspector in accordance with Foothills'

## **2000 SECTION 58 APPLICATION**

### **Zone 6 - Eastern Leg Alberta**

Operating Standards, Foothills' contract specifications and Foothills' Environmental Plans and Procedures Manuals, as amended and applicable.

Given the location and nature of the work and the procedures that will be followed, adverse environmental impacts are not anticipated.

#### **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 carried out 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 drain tanks will be located within the existing Foothills facilities.

#### **Anticipated Timing**

Third quarter of 2000.