



ALBERTA WILDERNESS ASSOCIATION

"Defending Wild Alberta through Awareness and Action"

Hon. Rob Renner
Minister of Environment
Deputy Government House Leader
#425 Legislature Building
10800 - 97 Avenue
Edmonton, AB T5K 2B6

Sent via email: medicine.hat@assembly.ab.ca

Hon. Ron Liepert
Minister of Energy
323 Legislature Building
10800-97 Avenue
Edmonton, AB T5K 2B6

Sent via email: calgary.west@assembly.ab.ca

Dear Ministers Renner and Liepert,

Alberta Wilderness Association (AWA) is writing in regard to concerns illustrated by the April 28 Rainbow Pipeline spill. The failure of the 45-year old Plains All American Rainbow pipeline, which discharged 4.5 million litres of crude oil into boreal wetlands and forest, has raised significant concerns surrounding pipeline integrity, as well as operator and regulatory response. AWA recommends a full investigation into the environmental and health effects of this spill, and into the regulatory gaps which allowed such a large-scale release to occur. These reports should be made publicly available.

In statements made by company representatives, it was reported that improper 2010 repair procedures created stress on the pipeline due to poor soil compaction. The pipeline operator detected an "unstable condition" on April 28 at 7 p.m., but it took nearly eight hours to determine a release had occurred. Though the pipeline was quickly closed, the shutoff valves nearest the rupture were reportedly 137 kilometres apart on the 770-kilometre pipeline.

These statements indicate that the management and monitoring system currently in place is not robust enough to ensure a high level of pipeline integrity is maintained throughout the province. As well, 40 percent of Alberta's pipeline system was built before 1990, substantially increasing the risk of pipeline failure. In response to the July 2010 Enbridge Inc. pipeline leak in Michigan in which 4 million litres of oil

was spilled into the Kalamazoo River, Albertans were reassured by ERCB representative Bob Curran. "It's unlikely that there would be many segments in Alberta that are decades old, unless they're on the types of lines where they're not really prone to corrosion or leaks," said Curran at the time. "Or they're carrying substances that wouldn't cause a lot of problems if there was a leak." Recent events contradict this claim; the Rainbow I pipeline was built in 1966. The public needs more evidence that Alberta's older pipelines are safe, and that decisions are being made with their safety and best interests in mind.

The ruptured pipeline discharged millions of litres of oil into surrounding wetlands. Boreal peat wetlands make up 40% of northern Alberta's landscape and once damaged these valuable ecosystems cannot be replaced. AWA continues to call for a 'no net loss' wetland policy implemented throughout the province. As an official Alberta Wetland Policy is yet to be mandated, Alberta Environment must ensure the damage to wetlands caused by this and other pipeline failures is well-documented, and that risks to wetland habitat, surface water, and groundwater posed by pipelines are managed with a stronger precautionary approach.

A full and transparent investigation led by Alberta Energy in association with Alberta Environment into the safety, health and environmental damage associated with the Rainbow I Pipeline spill should be undertaken. Concurrently, the Energy Resource Conservation Board must thoroughly examine current pipeline management, monitoring, and enforcement policies. This must occur before Plains Midstream Canada's proposed Rainbow II Pipeline and all other proposed intra-Alberta pipeline developments are approved.

In the days following the spill, Premier Ed Stelmach assured the public that Plains Midstream Canada will not be allowed to reopen its aging Rainbow pipeline until the spilled oil is properly cleaned up, repairs are made and people in the nearby aboriginal community of Little Buffalo are assured the pipeline is safe. We trust these statements will be honoured. Once the cause of the failure is known, we trust appropriate charges will be issued, especially considering the operators poor safety record. The parent company of Plains Midstream Canada was fined \$3.25 million last year for 10 separate crude spills in the U.S.

The integrity of Alberta's pipeline system and environmental monitoring systems are of great international interest, thus substantially more must be done to assure the public that the risks associated with pipeline transport systems are managed robustly.

We look forward to your response to this letter.

Sincerely,
Alberta Wilderness Association



Madeline Wilson
Conservation Specialist

cc:

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