



Coal Bed Methane (Natural Gas in Coal) on Public Lands

Position

Alberta Wilderness Association (AWA) believes that coal bed methane (CBM) development should be regulated in a manner that is consistent with the maintenance of wilderness values. There is a fundamental need for the maintenance of wilderness that is free of industrial incursion. Outside of such areas, exploration and development must be conducted in an environmentally responsible manner.

Exploration and development of CBM outside of wilderness areas must proceed in a manner that minimizes the impact on the land surface and must not occur unless the maintenance and conservation of a healthy aquatic ecosystem and ground water resources can be guaranteed.

Definition

Wilderness refers to existing and proposed protected areas, areas designated under the Eastern Slopes Policy as Prime Protection or Critical Wildlife Zone, Environmentally Significant Areas (ESAs), large and unfragmented wild areas, wild river corridors and riparian areas and other environmentally sensitive areas.

Points of Emphasis

- AWA's Position Statement regarding Hydrocarbon Exploration and Development applies to Coal Bed Methane exploration and development.
- Hydrocarbon, including CBM, exploration and development that involves surface disturbance should not be permitted in wilderness.
- CBM exploration and development in transition zones surrounding wilderness must not be allowed as the well density, noise pollution and potential for adverse hydrologic effects of CBM development is likely to impact the ecological integrity of the adjacent wilderness.
- Throughout Alberta, CBM exploration and development require ecological assessment and monitoring before, during and after the project.
- Full-field life-cycle planning must be required for all new developments including phase-out and reclamation/restoration planning.
- CBM must not be developed until there is more legislative and regulatory certainty to adequately deal with CBM particular issues in Alberta. Existing conventional hydrocarbon exploration and development regulations are inadequate for CBM development.
- CBM must only be permitted where there is a thorough environmental impact assessment and where the proponent of the CBM exploration and development can





show that surface disturbance, noise pollution, and fresh water resources will not adversely affect surrounding wilderness or the environment.

- CBM must not be permitted where non-saline (fresh/potable) water that will be produced, where water extraction may result in alteration of surface water hydrology or quality, or where there is potential for contamination or co-mingling of aquifers.
- CBM exploration and development must be conducted using best environmental practices to protect wilderness and water resources. These measures must include, but are not limited to, reduction/elimination of flaring; elimination of venting; elimination of dewatering of non-saline aquifers; elimination of dewatering and exploration of saline water aquifers where ground water or surface water may be affected; mandatory saline water pipeline and storage monitoring; mandatory set-backs from wilderness and other environmental values; use of alternative energy sources to reduce/eliminate the need for transmission lines to development sites; reduction/elimination of noise and light pollution associated with operating facilities; and, strict regulation surrounding surface access and linear disturbances that demand very high standards for protection.
- CBM exploration and development must cease until significant improvement of noise reduction technologies are put in place. The requirement for ongoing use of compressors in CBM extraction will cause significant and long-term noise pollution and air pollution.
- Road reclamation must be paramount on the agenda of both the government and industry and specific requirements should be attached to all development approvals (whether in wilderness or not) with the ultimate goal of an overall reduction of linear disturbance density throughout the province..
- Similarly, pipeline rights-of-way and associated surface disturbances must be minimized. Operators should use and/or share existing rights-of-way for pipelines and infrastructure.
- CBM exploration and development must not be financially promoted, through changes to the royalty structure or other similar subsidy to the detriment of the public good.

