

Assessment of RID Commitments

The following is an analysis of commitments made in the Rumsey South Regionally Integrated Decision (RID) related to protection of the ecosystem of public consultation, that are not being met.

<p style="text-align: center;">RID Commitment Re Ecosystem Protection and Consultation</p>	<p style="text-align: center;">Action/Failure to Act</p>
<p>Disturbance of wetlands will be avoided (pg. 21).</p>	<p>The proposed Pioneer well is situated within 50 m of a wetland and the access trail runs near or through the wetland. This is done to reduce impact on rough fescue grasslands. Access routes cut through or close to wetlands.</p>
<p>Sites of rare and sensitive flora will be avoided (p. 21).</p>	<p>Plains rough fescue grassland communities are now on the ANHIC Tracking List as elements of biodiversity considered "rare or special in some way". Well sites, pipelines and access routes continue to destroy rough fescue grasslands in Rumsey NA.</p>
<p>Drilling - After the exploration phase and before the development phase a master plan will be developed which allows for the efficient extraction of the under ground resources while minimizing the amount and impact of road building. (p. 22)</p>	<p>Is the Access Management Plan included in RID the master plan? When did the exploration phase end?</p> <p>Coalbed methane wells were not contemplated by those developing the RID. Was the Pioneer well considered as part of a master plan?</p>
<p>Pipelines – A master plan will be developed which minimizes the amount and degree of pipeline construction required for development of proven reserves. (p.22)</p> <p>Pipelines – Major pipelines will be routed to avoid crossing the Parkland. (p. 22)</p>	<p>Where is this master plan?</p> <p>In 1999, BP Amoco re-routed a major pipeline around the Natural Area due to environmental concerns. Meanwhile numerous small pipelines continue to be constructed inside the Natural Area.</p>
<p>Public Lands Division will continue the assessment of previously reclaimed roads and trails, wellsites and pipelines. The study will focus on the success of the recommended native seed mixtures and the ability of the indigenous native grasses to invade these reclaimed sites. (p.23)</p> <p>Revegetate disturbed areas using native seed mixture that will allow the encroachment of the adjacent native vegetation. (p.23)</p> <p>Further studies will be conducted to assess the success of past and current reclamation activities. (p.25)</p>	<p>A 1992 inventory of 6 well sites abandoned 5 to 13 years found fair to poor establishment of native species and invasion of non-native species used in reclamation into native prairie. (Integrated Environments Ltd. 1991)</p> <p>A 1995 study of vegetation on 25 wellsites, 3 pipelines and 5 controls found much lower cover of native grasses on wellsites (19%) and pipelines (28%) compared to controls (77%) and higher cover of introduced grasses and forbs. (Eastern Slopes Rangeland Seeds Ltd. 1995)</p> <p>Preliminary findings of a 2006 survey of 63 wellsite and pipeline disturbances are that there are more non-native species on disturbed sites than</p>

	<p>undisturbed sites. Only a very few sites have rough fescue as a dominant; wheat grasses, Kentucky bluegrass or smooth brome dominate plant communities on the large majority of sites. (Peggy Desserud pers. comm.).</p> <p>Crested wheat grass, an aggressive invasive alien, was planted along a pipeline right of way in 2005. Smooth brome and Kentucky bluegrass, invasive alien species, have become established on disturbances without remediation.</p> <p>Despite these findings new disturbances are allowed.</p>
<p>Ecological expertise will be used to conduct biophysical inventories with emphasis on rare and sensitive ecological resources within the Parkland. (p.25)</p>	<p>Implementation has been delayed for 13 years. In 2006 range inventories with a rare plant species component were conducted in a part of the Rumsey block.</p>
<p>A review will be conducted on the cumulative effects of existing oil and gas developments as it relates to the ecological integrity of the Parkland. (p. 25)</p>	<p>Implementation has been delayed for 14-15 years. A cumulative effects assessment is proposed as part of U of A PhD student research in 2007& 2008.</p>
<p>Continual assessments will be made of the factors affecting vegetation change in the area (i.e. fire, climate, grazing) for reference in maintaining the ecological integrity of the Parkland. (p. 25)</p>	<p>Range inventories were completed in 1994 by Eastern Slopes Rangeland Seeds Ltd. Overall the range was evaluated in good condition; however there were signs of heavy grazing on knoll tops, in wetlands, along trails and at dugouts.</p> <p>A grazing lease was sold and grazing regime changed in part of the area without a monitoring plan to assess the effects.</p>
<p>Forestry, Lands and Wildlife and Tourism, Recreation and Parks will review and explore options for legally designating the Parkland, in recognition of protecting its unique ecological resources. (p. 25)</p>	<p>In 1996, Rumsey South was legally designated as the Rumsey Natural Area by Order in Council and became part of the Special Places 2000 Program. The <i>Wilderness Areas, Ecological Reserves and Natural Areas Act</i> was amended (Schedule 74). It was assumed the RID would continue as the management plan; however, there was no assessment of the RID's performance in protecting ecological resources or consistency with protected area management.</p> <p>In 2003, <i>Information Letter 2003-25 Government of Alberta: Honouring Existing Mineral Commitments in Legislated Provincial Protected Areas</i> was signed by SRD, CD and Energy. It states government will honour commitments that existed prior to a protected area being established; but, any subsurface disposition or right coming into affect after the protected area is established does not qualify as an existing commitment. Parks</p>

	maintains that any new mineral commitments after 1996 should have a “no surface access addendum”. Energy continues to sell dispositions in Rumsey without the no surface access addendum.
The existing access routes including those previously reclaimed as shown in Figure 5 constitute the only access routes permitted for use to drill and develop the petroleum and natural gas resource with the exception of roads constructed to allow development of P&NG rights issued prior to 1 Jan 1991. (p. 32)	New access routes up to 200 m long are being developed to new well sites.
Existing access routes, which are no longer required will be reclaimed... (p. 32)	No access routes have been reclaimed.
Locked gates be erected by the mineral disposition holder at all roads held under LOC and MSL. (p. 32)	This has not been done.
A purpose of implementation is...To ensure ongoing and meaningful public involvement as the RID is implemented. (p. 34)	<p>There has not been a mechanism or opportunity for public involvement in implementation of the RID.</p> <p>Public input has been ignored in allowing oil and gas development to continue in the Rumsey Natural Area.</p> <p>AWA’s offer to provide steward services in the Rumsey Natural Area (spring 2005) was declined.</p> <p>A Technical Advisory Committee was established in 2006, including representatives from ANPC, industry and academia to guide research regarding reclamation and cumulative effects commitments in the RID.</p>
As the land management agency, and using the Public Lands Act as the authority to place appropriate conditions on surface land use activities, the Public Lands Division will assume primary responsibility for putting the RID into effect, but all participating agencies will assume implementation responsibilities that relate to their own areas of jurisdiction. (p. 34)	<p>In 2006 (17 Mar) a <i>Memorandum of Understanding: Management and Issuance of Land Dispositions on WAERNA and PP Lands</i> was signed by Deputy Ministers of SRD and CD making Parks the lead agency in management of designated natural areas, including the Rumsey Natural Area.</p> <p>Alberta Energy is not respecting Parks lead role.</p>
The resource management activities of all provincial government agencies within the Parkland, will be conducted in conformance with the provisions of the RID. (p. 34)	Several commitments in the RID with respect to ecosystem protection have not been honoured.
The RRMC will be responsible for firstly,	The RRMC no longer exists.

<p>monitoring work accomplishment and compliance with the RID and secondly, evaluation the effectiveness and relevance of the provisions of the RID. (p. 35)</p>	
<p>The results will be reported in an annual "Highlight Summary" report that will provide updates on the implementation of all plans in the Central Region for which the RRMC is responsible. (p. 35)</p>	<p>Annual reports have not been produced.</p>
<p>Every five years, the RRMC will produce a Plan Assessment report that will evaluate whether or not the plan remains current and whether or not a Major RID review is required...A major RID review would entail: a comprehensive assessment of all aspects of the RID; a major rewriting of the RID as required; and a public review. (p. 36)</p>	<p>In 2001, there was an assessment of the RID by Public Lands and consultation with government agencies involved in the original process (<i>was EUB consulted?</i>)</p> <ul style="list-style-type: none"> - There was no public review. - The area's 1996 designation as a protected area is not reflected except to note that designation brings Recreation and Protected Areas into the referral loop wrt recreation resources. (p. 6) - Reserves in the Natural Area represent less than 0.00001% of total oil and less than 0.00001% of provincial gas reserves. (p. 7) - The document states "...interest to drill within the Parkland appears to be subsiding..." hence, CBM development was not contemplated.

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