

# Interim Directive

## ID 99-5

3 June 1999

**TO: All Oil and Gas Operators and Regulated Utilities  
All Drilling and Service Contractors**

### **DISPOSAL OF DRILLING WASTE ASSOCIATED WITH ALBERTA ENERGY AND UTILITIES BOARD (EUB) REGULATED PIPELINE AND/OR OTHER OIL AND GAS RELATED BELOW GROUND BORING ACTIVITIES**

Directional drilling (boring activity) is practiced by the oil and gas industry as a method to mitigate environmental impact. The Alberta Energy and Utilities Board (EUB) is concerned about increased use of directional drilling for pipeline installation in environmentally sensitive areas. Those concerns pertain to potential toxicity of drilling mud, the impact of drilling mud releases on water quality or infrastructure, and the methods of drilling waste disposal.

Drilling waste resulting from directional drilling and boring for the purpose of pipeline construction and/or other related below ground boring activities must be disposed in accordance with EUB *Guide 50, Drilling Waste Management* (IL 96-13).

#### **Toxicity Assessment**

Prior to drilling, the potential toxicity of chemical additives (added to the drilling system for the purpose of enhancing or modifying the performance of that system) must be evaluated. The Petroleum Services Association of Canada (PSAC) maintains a *Product Listing for Potential Toxicity*. This listing contains toxicity assessment data for various mud products. Drilling systems composed solely of fresh water/bentonite are considered non-toxic by the EUB and no pre-testing is required. Drilling systems with a known toxicity must not be used.

#### **Notification Requirements**

In the event that drilling mud enters water or may cause impact on surrounding surface improvements, the operator must notify the appropriate EUB Field Centre immediately. Information regarding the nature of release, volumes, mud characteristics, and remedial action taken must be provided to the EUB Field Centre at the time of notification. Inadvertent release of drilling mud into the environment must be cleaned up by the operator immediately and disposed of as per Guide 50.

## **Disposal Requirements**

Disposal of drilling waste from below ground boring activities does not require notification or approval from the EUB. Drilling waste must be sampled and in compliance with the appropriate disposal criteria outlined in Guide 50. Landowner approval is required prior to disposal. On Crown lands, this approval must be obtained from Public Lands, Alberta Agriculture, Food and Rural Development (white area) or Land and Forest Services, Alberta Environmental Protection (green area).

The *Notification of Drilling Waste Disposal* form is available electronically and may be used for the purpose of automatic calculations. Submission to the drilling waste database (CGI database) is not required.

## **Enforcement**

In the event of a release of drilling mud into the environment, the EUB may request and examine company records and where appropriate require further investigation and/or remedial action to mitigate the impact. Failure to notify as required or inappropriate disposal which impacts the environment will result in EUB/AEP enforcement actions consistent with other release events as per Informational Letter 98-1 (*Memorandum of Understanding Between Alberta Environmental Protection and the Alberta Energy and Utilities Board Regarding Coordination of Release Notification Requirements and Subsequent Regulatory Response*) and Guide 50.

For further information on this Interim Directive or Guide 50 contact the EUB at (403) 297-8311 and ask for the Operations Group. Further information may be obtained from:

- For public land (White Area), Public Lands, Alberta Agriculture, Food and Rural Development at (780) 427-6597.
- For public land (Green Area), Land and Forest Services, Alberta Environmental Protection at (780) 427-8474.

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Board Member