

Weekly NEWS

esaa Environmental
Services
Association of
Alberta

An Information Service for Alberta's Environment Industry

The Week Ending July 10th, 2020



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The ESAA Weekly News is published weekly by:

**Environmental Services
Association of Alberta
102, 2528 Ellwood
Drive SW
Edmonton, AB T6X 0A9
(P) 780.429.6363
(F) 780.429.4249
info@esaa.org
www.esaa.org**

**Comments & submissions
are welcome!**

Please submit your
announcement
via e-mail to:
weeklynews@esaa.org

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SURVEY - ALBERTA'S SITE REHABILITATION PROGRAM

**SUBMISSION DEADLINE – JULY
10TH**

ESAA has been working with our members to gather feedback regarding the Government of Alberta's Site Rehabilitation Program (SRP). We wish to provide Alberta Energy a summary of this feedback to communicate both the initial positive outcomes and areas of the program our members have raised concerns about.

Therefore, ESAA is kindly asking you to complete the following short survey so that we can convey to Alberta Energy your responses and how successful you feel the program has been to date.

We are not collecting company information and all information collected will be kept anonymous and confidential, with only aggregated results being presented.

Survey Link ---> www.surveymonkey.com/r/73XPBKQ

ALBERTA ENVIRONMENT AND PARKS: DRAFT GUIDE FOR REVIEW - SUPPLEMENTAL GUIDANCE FOR SITE-SPECIFIC RISK ASSESSMENTS

Alberta Environment and Parks is releasing the Draft *Supplemental Guidance for Site-Specific Risk Assessments in Alberta* for public comment.

This guide provides additional clarification on the expectations for site-specific risk assessments in Alberta, as set out by the Government of Alberta's *Contaminated Sites Policy Framework* and the *Alberta Tier 1 Soil and Groundwater Remediation Guidelines* and *Alberta Tier 2 Soil and Groundwater Remediation Guidelines*.

[Download the Guide](#)

The Draft Guide is provided for public comment until September 25, 2020.

INSTRUCTIONS

- Please forward all feedback or questions to: Land.Management@gov.ab.ca, referring to "Supplemental Guidance for Site-Specific Risk Assessments in Alberta".
- Please use the [comment form](#) when providing review comments.

The time for positive impact is now.

The Alberta Site Rehabilitation Program has launched.

With this, comes many opportunities for Alberta's economy and the environment. Tree Time provides support to our clients through all stages of their reclamation projects, maintaining the highest level of health and safety standards, and respect for Alberta's land. Due to the popularity of this program and limited access to funding, we need to move quickly. If you have a reclaimed or restored site that is ready for planting, we have seedlings available and can help you get your reclamation certificate faster.

Find out how we can help at TreeTimeServices.ca/ASRP



DELAYS, CONFUSION AND LITTLE WORK AS ALBERTA GOVERNMENT DISBURSES \$1B TO CLEAN UP OLD WELLS

(Source: CBC News) A wildly popular government stimulus program aimed at providing work for thousands of oil and gas workers — and keeping oilfield service companies afloat — is being criticized for not approving funds fast enough, being too confusing, and having the unintended consequence of halting cleanup activity in the interim.

The federal government announced the \$1.7 billion program [in April](#) and handed over responsibility of disbursing the funds to the British Columbia, Alberta and Saskatchewan governments. There are tens of thousands of inactive oil and gas wells across western Canada and the stimulus spending should help reduce the environmental risk associated with having so many wells sitting idle.

The Alberta government received [the bulk](#) of the money and has initially offered to fund the full amount to clean up a well, up to \$30,000.

With government money up for grabs while oilpatch spending has been sparse, industry reaction to the program has been substantial. When the first phase of Alberta's program launched on May 1, Scott Darling said he had seven people working on submitting applications, including himself.

"It was confusing and frustrating at putting stuff in but, you just say, this is people's livelihoods, we got to keep at it," said Darling, president of Calgary-based Performance Energy Services and Production, about the application process.

"So we stayed up all night and put them in, and then right through the weekend and then through the next week as well."

In total, he's submitted about 2,800 applications and, to this point, only received four approvals and 126 rejections.

Reduced spending from companies

As industry players compete for the government funding, oil and gas producers aren't spending any of their own money to clean up wells. As a result, reclamation work has dried up completely, which is the opposite of what the stimulus program was meant to achieve.

"It froze the industry, especially the abandonment industry. You can't blame [oil and gas producers] when they want to wait and see if they can get maybe even just a piece of this," said Darling. "So it just put a stop, a complete end to it."

Darling cut his staff from about 100 employees down to about 60. On any given day, roughly 20 are actually working in the field.

"It's been incredible, especially the layoffs again. You know you're laying off really good people now and you're hoping that they'll still be around at the end of this, when we do start getting back to work," he said.

So far, the Alberta government said it has approved about \$64 million in applications for its \$1 billion well clean up program.

Slow process

"It's been a little slow getting from application to award," said Kevin Neveu, CEO of Precision Drilling, during an investor conference event earlier this week.

The government has been overwhelmed by the response from industry, said Neveu, as everyone from surface remediation businesses, service rig companies, and fencing suppliers are trying to access the program.

"I think they expected this to be big, but had no idea how many applications would come in. And that seems to be bogging down the award process," he said.

Precision Drilling has only received a few approvals so far, said Neveu, although he is confident the company will eventually get its share of the funding — and he still thinks the programs in western Canada will have a meaningful financial impact on the industry.

Alberta's program may not provide an immediate boost in activity for the oilfield service sector because when an application is approved, the company has until the end of 2022 to complete the work.

In addition, those in the industry say there are delays when different applications for the same well are processed at different times. For instance, a company will receive approval to clean up the wellhead and the land, but the well must first be remediated below the surface. If the subsurface application has been approved, the other work has to wait.

'Delays and challenges'

"Government contracts are very different than how industry does contracts and so there have been a lot of delays and challenges," said Elizabeth Aquin, the interim CEO of the Petroleum Services Association of Canada.

"Companies actually are frustrated because they are only now beginning to get the contracts."

Industry officials want Alberta to increase the speed of awarding funding and better communication with companies about the program.

For instance, there are questions about who pays for cost overruns above the \$30,000 limit and whether companies who are not approved for the first and second phase of Alberta's program need to resubmit applications for subsequent phases.

Sonya Savage, Alberta's energy minister, was not available for an interview. However, her spokesperson said improvements to the program are being made.

"Phase 1 of the program was intended on delivering grant funding to some of the most simple and straightforward applications," Kavi Bal said via email.

"Decisions on future rounds are currently being finalized based on industry and stakeholder feedback. Alberta Energy is looking at different ways to maximize the flow of grant funding through a fair process."

Bal said any cost overruns on a cleanup project are the responsibility of the oil and gas producer, not the government.

ALBERTA PROPOSES LEGISLATIVE FIXES TO BRING CLARITY TO SAND AND GRAVEL PIT REGULATIONS

The Alberta government wants to amend two pieces of legislation in order to protect sand and gravel pit operators from confusing regulatory hurdles imposed by a recent court decision.

On May 6, the Alberta Court of Appeal ruled that sand is properly considered a mineral under the Environmental Protection and Enhancement Act (EPEA).

As a result, sand operations producing more than 45,000 tonnes per year were to be regulated as a quarry instead of a pit, which they had been regulated as previously, the Environment and Parks Ministry said in a release Tuesday,

The ministry said the court decision created regulatory uncertainties for sand and gravel operators.

Bill 31, which was introduced in the legislature on Tuesday afternoon, would amend the definition of minerals and pits in the EPEA and remove references to silica sand in the Public Lands Act (PLA).

The province says if the amendments are not made, applications for projects in excess of 45,000 tonnes would have to be revised under complex new approval requirements, including an environmental impact assessment.

There are also 500 applications currently awaiting review as pits, not quarries, that would have to be revised if Bill 31 isn't passed, the government said.

"This bill will provide clarity and consistency for job creators in the sand and gravel industry while still maintaining stringent environmental protection regulations," said Environment and Parks Minister Jason Nixon in the release

The release said there aren't any consequences to the end of life/reclamation cycle because of the proposed legislative amendments as both quarries and pits need to be reclaimed.

AER: HYDROCARBON STORAGE REQUIREMENTS

In light of the increased demand for hydrocarbon storage, the AER would like to remind industry of the following hydrocarbon storage requirements:

- Licensees must transfer hydrocarbon production fluids to an AER licenced facility that is authorized to accept this material as outlined in *Directive 017: Measurement Requirements for Oil and Gas Operations* and *Directive 007: Volumetric and Infrastructure Requirements*.
- Licensees transferring hydrocarbon production fluids to another licensee's AER approved facility must meet custody transfer and delivery point measurement requirements as outlined in *Directive 017*.
- All production, receipts, dispositions, and inventories must be reported to Petrinex as outlined in and *Directive 007*.
- Unless otherwise authorized by the AER, the addition of above ground storage capacity to any AER licenced site must:
- Meet all storage requirements outlined in *Directive 055: Storage Requirements for the Upstream Petroleum Industry* and *Directive 055 Addendum: Interim Requirements for Aboveground Synthetically Lined Wall Storage Systems, Updates to Liner Requirements, and Optional Diking Requirements for Single-Walled Aboveground Storage Tanks*, including temporary storage duration limits.
- Not exceed *Environmental Protection and Enhancement Act* and *Directive 056: Energy Development Applications and Schedules* licenced or approved maximum values, or total design rates associated with all on-site equipment at the location.
- Meet all spacing requirements outlined in section 8.090(1) of the *Oil and Gas Conservation Regulations* or *ID 91-03: Heavy Oil/Oil Sands Operations*.
- Meet *Directive 060: Upstream Petroleum Industry Flaring, Incinerating, and Venting* requirements, including emissions and odour control.

Licensees remain responsible for ensuring all AER rules, regulations, and requirements are met.

Please direct inquiries to inquiries@ aer.ca

ONTARIO DELAYS THE COMMENCEMENT OF THE NEW EXCESS SOIL REGULATION

(Source: HazMat Magazine) In response to impacts from COVID-19, the Ontario Ministry of Environment, Conservation and Parks (MECP) recently announced it was delaying implementation of requirements under the new Excess Soil Regulation from July 1, 2020 to January 1, 2021. MECP also stated that they are exempting municipalities and health care providers from filing a Record of Site Condition to develop a temporary health or residential facility for emergency situations.

Delayed implementation of the excess soil regulation

In December 2019, the Lieutenant General in Council made the new On-Site and Excess Soil Management Regulation, O.Reg. 406/19 (excess soil regulation) under the Environmental Protection Act (EPA). The excess soil regulation clarifies rules related to the reuse and management of excess soil, including:

- standards for appropriate reuse of excess soil
- when excess soil is designated as a waste
- when waste-related approvals are required for soil management under Part V of the EPA

The excess soil regulation is being phased in. Some provisions would have come into effect on July 1, 2020. However, in light of the COVID-19 outbreak, the MECP is temporarily delaying the implementation of the new regulation for managing excess soil by six months.

As a result, these provisions are temporarily delayed and will now come into effect on January 1, 2021.

In the meantime, the MECP's current waste regulatory framework will continue to apply, and the ministry will take action with any non-compliance or to address any concerns as it applies to the management and disposal of excess soil.

The MECP will also continue to work with municipalities and other stakeholders to:

- understand and implement the regulatory changes
- encourage early adoption of changes as appropriate

Consequential amendments that were made at the same time as the excess soil regulation to O. Reg. 153/04 (Records of Site Condition), Regulation 347 (General Waste Management) and O. Reg. 351/12 (Waste Management Systems EASR Regulation) are also delayed and will come into effect on January 1, 2021.

Other implementation dates in the excess soil regulation have not changed, including implementation of provisions dealing with the excess soil management planning requirements and the Registry which remain coming into effect on January 1, 2022, as well as other provisions on January 1, 2025. Similarly, the excess soil regulation will continue to grandfather contracts related to excess soil management entered into before January 1, 2021.

Amendment to the Records of Site Condition Regulation

The MECP have also amended O. Reg. 153/04 (Records of Site Condition Regulation), to exempt temporary health facilities or residential facilities that are built on land previously used for community or commercial purposes in response to emergencies declared under the Emergency Management and Civil Protection Act.

Because a temporary health or residential facility is considered a more sensitive use under the EPA, an RSC is required to be filed in the Environmental Site Registry before the facility can be established on property or in a building that is used for a less sensitive use, such as an industrial, commercial or community use.

The work to file an RSC requires:

- retaining a qualified person

- conducting one or more environmental site assessments
- possibly soil remediation

This work can take several months or longer. This would create a significant delay where these temporary facilities are required urgently to respond to a declared emergency.

This exemption would apply to:

- a temporary facility established in response to the current emergency, such as COVID-19 testing tents or isolated medical structures
- the establishment of a temporary facility responding to any future declared emergencies, including any future phases of the pandemic

All other requirements that are part of the MECP's legislative framework, including the regulation of waste management and discharges to the natural environment, would continue to apply to the operation of these temporary facilities, and the ministry will take action in response to environmental concerns, if they emerge.

NEW CANADIAN RENEWABLE ENERGY ASSOCIATION LAUNCHED

(Source: EnvironmentJournal.ca) Effective July 1, 2020, the Canadian Renewable Energy Association is the new multi-technology industry association that provides a unified voice for solar energy, wind energy, and energy storage in Canada. It has been created by uniting the Canadian Wind Energy Association (CanWEA) and the Canadian Solar Industries Association (CanSIA) into a new, expanded association that also includes energy storage.

The new association is being launched against the backdrop of the global COVID-19 pandemic, which has fueled a debate about Canada's energy future and the acceleration of the ongoing transition to a cleaner, low-carbon economy.

"The Canadian Renewable Energy Association will be advocating for investment in wind energy, solar energy and energy storage projects that can deliver both jobs and economic benefits today, as well as the infrastructure that will provide a foundation for significantly more investment in the jobs, economic activity and energy solutions of tomorrow," said Robert Hornung, the founding president and CEO of the Canadian Renewable Energy Association. "While this has been a time of tremendous challenge for our country, the pandemic also presents Canada with an opportunity to invest in sustainable pathways for addressing economic and environmental challenges."

If Canada is to meet its target of net zero greenhouse gas (GHG) emissions by 2050, a significantly expanded non-emitting electricity grid will be needed to support increased use of electricity in transportation, buildings and industry. Success will require wind energy, solar energy and energy storage technologies to play a critical role in this effort.

In Canada and around the world, electricity systems are rapidly innovating and modernizing to leverage new technologies and wind energy, solar energy and energy storage are rapidly becoming the low-cost solution for Canada's future electricity needs. The rapid growth of wind energy, solar energy and energy storage solutions around the world is also enhancing the reliability, flexibility and scalability of energy production and use.

According to this new association, renewable technologies present exciting new opportunities for investment, citing Bloomberg projections of US \$9.5 trillion in global investment in wind and solar energy between 2018 and 2050 and almost US \$1 trillion more in batteries for energy storage. These figures represent 77 per cent of the total projected global investment in power generation over that period.

"The 300+ members of our new Association will advocate for policies – federally and provincially – that facilitate and enable delivery of the low-cost, non-emitting solutions increasingly sought by Canadian electricity consumers," said Michelle Chislett, interim board chair of the Canadian Renewable Energy Association, and managing director for Canada & U.S. Development at Northland Power. "Our members are ready and willing to help Canada capture the synergies that connect wind energy, solar energy and energy storage technologies."

ESAA MEMBER NEWS

**TRACE ASSOCIATES INC. (TRACE) IS LAUNCHING OUR FIRST
TRACE TIKTOK CHALLENGE IN SUPPORT OF CANADIAN CHARITIES**



Maximum
\$5000
to the winners registered
charities of choice

Submit by July 11, 2020 | 12:00 p.m.
tracetiktok@traceassociates.ca
Winners announced July 17, 2020

Trace will donate up to \$5,000 for the TikToks with the most views! The contest is open not only to Trace folks but also any of our clients and suppliers, including pets.

How Does It Work?

The theme is "Dance Like No One Is Watching." We're looking for dance themed TikToks with hashtags #tracedance, #tracegives, #tracetiktok. Trace will donate a maximum of \$5,000 to the winners' registered charities of choice.

Guidelines

- Have fun
- Be positive and appropriate
- Be safe

Winners

The top five submissions with the most views will select their charity of choice, and Trace will donate \$1,000 to that charity (total of \$5,000, regardless of combination). Be sure to share and get your charities involved to help with your views.

To create TikTok video:

- Create TikTok account
- Create your video and post as "Private" and make sure the setting "Save to Device" is on
- Be sure to use our hashtags
 - #tracedance
 - #tracegives
 - #tracetiktok
- Send the TikTok video to TraceTikTok@traceassociates.ca

Timing

July 16, 5:00 p.m.

July 17

Last day of contest

Announce winners

UPCOMING EVENTS



RemTech 2020 Update – Call for Abstracts Extension

ESAA is continuing to monitor the COVID-19 situation and following the advice of medical authorities. ESAA remains hopefully that we will reach the final stage of reopening in time for *RemTech* which allows for industry events. At this time, we are unsure of what the restrictions will be with regard to events during that time. Thank you for your patience during this time.

**RemTech 2020
October 14-16, 2020**

Call for Abstracts Extended (July 17th)

ESAA invites you to submit technical abstracts focusing on technologies for the remediation of contaminated soil. Abstracts are encouraged in, but not limited to, the following areas:

- In-Situ and Ex-Situ Treatment
- Physical / Biological / Chemical Treatment
- Soil Washing and Scrubbing
- Thermal Desorption
- Incineration
- Stabilization / Solidification
- Immobilization
- Aeration
- Soil Venting
- Membranes
- Encapsulation
- Vitrification
- Natural Attenuation
- Oil Sands Remediation / Reclamation
- Oil Spills Management
- New Technology and Research
- Remote and Difficult Locations
- Reclamation
- Emerging Contaminants
- Superfund Projects
- Landfill Closure
- Phyto-remediation
- All other related topics will be considered

The preliminary selection of presentations will be based on submitted abstracts and reviewed by a panel of peers.

Abstracts should be no longer than 500 words (not including bio), should include a presenter biography and be submitted as a [Word Document](#) by no later than July 17th, 2020.

Before submitting your abstract, ensure that client approval has been obtained for your potential presentation.

- Send abstract submissions to Joe Chowaniec via email to: info@esaa.org
- Notification of acceptance will be given by August 21st, 2020.
- Full presentations must be submitted by September 30, 2020.
- Full details available: www.esaa.org/remtech/agenda/call-for-abstracts/

Early Bird Registration is now open with special delegate rates available for Members and Non-Members. **Register Now and save 15%.** Early bird rate ends July 17th, 2020.
Full details available online at: www.esaa.org/remtech/

ECO CANADA COURSE: FROM GOOD TO GREAT: A READER-CENTRIC APPROACH TO CLEAR TECHNICAL WRITING

Becoming a great technical writer doesn't just happen over night. It's a life-long commitment that requires training and practice. Take control and advance your writing skills to the next level with our Virtual Technical Writing Workshop hosted led by Beth Burrows.

Registration Link: <https://www.eco.ca/training/online-course/from-good-to-great-a-reader-centric-approach-to-clear-technical-writing/>

Industry Positions Openings



As a benefit of ESAA Membership, ESAA Members can now post position openings on our website at no charge. Position opening ads also will appear in the newsletter at no charge. For full details visit: <https://www.esaa.org/news/job-board/>

Note: You must still complete the advertising form. After completing the order form, you will receive an email with a link to post your position.

Non-Members are welcome to advertise as well for a nominal charge. Visit [advertising form](#) to place your order.

Job Title	Organization	Application Deadline	Term	Details
Intermediate Environmental Professional	H3M Enviromental	2020-07-31		more
Intermediate Environmental Professional	H3M Enviromental	2020-07-31	Full-Time	more
Project Manager	H3M Enviromental	2020-07-31	Contract	more
Department Manager I	Element Materials Technology	2020-03-16	Full-Time	more

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