

BULLETIN

Date	Subject	Notice
July 5, 2019	Clarification of Directive PNG014 HDD reporting requirements	BT2019-008

Reporting Drilling Fluid Releases from Horizontal Directional Drilling (HDD) for Pipeline Construction

Directive PNG014: Incident Reporting Requirements (Directive PNG014) sets out notification and reporting requirements for HDD type incidents. This bulletin is to advise that the Ministry of Energy and Resources (ER) considers industry in compliance with Directive PNG014 if pipeline licence holders and operators follow the reporting procedures outlined in this bulletin.

The bulletin differentiates release events as non-critical or critical, streamlines the reporting procedure of non-critical release and improves the effectiveness of reporting critical release.

Defining Non-Critical and Critical Release

A non-critical release is any release where the drilling fluid is not considered harmful and the release itself causes no adverse effects. Adverse effects are considered as impairment or damage to the environment or harm to human health, caused by any chemical, physical or biological alteration or any combination of any chemical, physical or biological alterations. Please see table 1 below for the criteria assessing non-critical HDD releases.

A critical release is any release that does not meet any of the criteria of non-critical release.

Table 1 Non-critical Release

Category	Criteria
Non-critical HDD Surface Release	<p>An HDD surface release if it meets the following criteria:</p> <ul style="list-style-type: none"> the release has not entered a water body; the release has not altered the configuration of the bank or boundary of any watercourse or water body; the release is contained within the right-of-way or within any temporary workspace; the release does not exceed 2m³; the drilling fluid contains additives that do not exceed criteria listed in the <i>GL 99-01: Drilling Waste Management Guideline</i>. In the absence

	<p>of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in the <i>GL 99-01 Drilling Waste Management Guideline</i>; and</p> <ul style="list-style-type: none"> the reasonable recovery of drilling fluids will be done immediately.
HDD Subsurface Release	<p>An HDD subsurface release if it meets the following criteria:</p> <ul style="list-style-type: none"> the drilling fluid additives do not exceed criteria listed in the <i>GL 99-01 Drilling Waste Management Guideline</i>. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in the <i>GL-99 Drilling Waste Management Guideline</i>; the drilling fluid additives do not have guidelines listed in the <i>GL 99-01 Drilling Waste Management Guideline</i>. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in the <i>GL 99-01 Drilling Waste Management Guideline</i>; and the release is not suspected to have impacts to potable and/or livestock water sources.

Reporting Procedure

Pipeline licence holders and operators are required to follow the reporting procedure listed in Table 2.

Table 2 Drilling Fluid Releases from HDD reporting Procedure

Category	Reporting Procedures
Non-critical HDD Surface Release	Use the Non-Critical HDD Surface Release Report Form . Email the report form to pipelines@gov.sk.ca after the completion of HDD construction activities.
Non-critical HDD Subsurface Release	Record the release and retain the records as part of the pipeline construction file.
Critical HDD Release	Follow notification and reporting requirements set out in Directive PNG014

Questions?

If you have any questions or concerns, contact the ER Service Desk at 1-855-219-9373 or ER.servicedesk@gov.sk.ca.