Supplementary Information for
AGM Recommendation #1

PLA Disposition Renewals

Before signing a statutory declaration, an Alberta Land Surveyor shall confirm in the field that all the facilities were constructed entirely within the survey boundaries as represented on the disposition Plan of Survey on file with Alberta Environment and Parks. In the event the disposition was not constructed entirely within the survey boundaries as represented on the disposition Plan of Survey on file, a Plan of Survey for the amendment of the disposition should be prepared.

The *Pipeline Regulation* states if a pipeline is contained wholly within the boundary of surface facility lease or abutting leases, it is not considered a pipeline and doesn't require an application for license. Below are excerpts from Part 1 of the *Pipeline Regulation*.

**Interpretation**

1(4) For the purposes of the Act and this Regulation, if piping or a pipeline that conveys gas, steam or HVP product is contained wholly within the boundary of a facility surface lease or wholly within the boundaries of adjacent and abutting facility surface leases, it is not considered a pipeline.

**Application for licence to construct and operate pipeline**

3(3) No application is required

...  

(b) if the pipeline, regardless of length, is contained wholly within the boundary of a facility surface lease or wholly within the boundaries of adjoining facility surface leases;

If a pipeline starts and ends within a lease or abutting leases, it is considered an onsite facility and is exempt from requiring a license. The disposition must stand on its own, independent of other dispositions, for a statutory declaration to be acceptable. The purpose of the facility in relation with the purpose of the disposition should be considered when defining the disposition boundaries. This is not limited to PLAs. For instance, an MSL and LOC could be constructed within the surveyed boundaries, but an amendment would be required if the wellhead or another wellsite facility was constructed within the LOC but outside the MSL boundaries. Taking this into account, below are six examples outlining when statutory declarations can be signed and when an amendment survey plan is required. The examples are not intended to be exhaustive.
Example 1: PLA to MSL boundary

Amendment Survey Plan required to encompass the buried pipe on the MSL; a Statutory Declaration is not acceptable.

Rationale: the portion of pipe on the MSL is not within the surveyed boundaries of the PLA. Also, the pipe on the MSL is not wholly within the surface facility lease from start to finish. Therefore, the portion of pipe on the MSL requires a license (part of the PLA) as per Pipeline Regulation.
Example 2: PLA 10m within MSL (with riser)

Statutory Declaration is acceptable.

Rationale: the pipe is found within the PLA boundaries until it ends at the riser within the MSL. The portion of pipe on the MSL to the wellhead is wholly within the surface facility lease and does not require a license, as per the Pipeline Regulation. A Statutory Declaration would also be acceptable if the pipe within the MSL is an above ground pipe.
Example 3: PLA 10m within MSL (no riser)

Amendment Survey Plan required to encompass the buried pipe on the MSL; a Statutory Declaration is not acceptable.

Rationale: a portion of pipe on the MSL to the riser is not within the surveyed boundaries of the PLA. The pipe license ends at the riser and needs to be covered by the PLA from beginning to end.
Example 4: pipe leaves PLA on MSL

Amendment Survey Plan required to encompass the buried pipe on the MSL; a Statutory Declaration is not acceptable.

Rationale: a portion of pipe on the MSL to the riser is not within the surveyed boundaries of the PLA. The pipe license ends at the riser and needs to be covered by the PLA from beginning to end.
Example 5: PLA through MSL (with risers)

Statutory Declaration is acceptable.

Rationale: the pipe is found within the PLA boundaries for the entire disposition. The portion of pipe within the MSL connecting to the wellhead is wholly within the surface facility lease and independent of the licensed pipe. A Statutory Declaration would also be acceptable if the connecting pipe within the MSL is an above ground pipe.
Example 6: PLA through MSL (pipe leaves PLA)

Amendment Survey Plan required to encompass the buried pipe on the MSL; a Statutory Declaration is not acceptable.

Rationale: part of the pipe leaves the surveyed boundaries of the PLA. The part of the pipe not covered by PLA is not considered an onsite facility.