



Petro-Canada

Prehearing Meeting
Applications for Wells and Associated
Pipeline and Facility Licences
Sullivan Field

April 16, 2008

ENERGY RESOURCES CONSERVATION BOARD

Decision 2008-029: Petro-Canada, Applications for Wells and Associated Pipeline and Facility Licences, Sullivan Field

April 16, 2008

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ENERGY RESOURCES CONSERVATION BOARD

Calgary Alberta

**PETRO-CANADA
APPLICATIONS FOR WELLS AND
ASSOCIATED PIPELINE AND
FACILITY LICENCES
SULLIVAN FIELD**

**Prehearing Meeting
Decision 2008-029
Applications No. 1520388, 1513051, 1517148,
1520922, 1517151, 1517158, 1517161, 1517162,
1517168, 1517170, 1517176, 1517160, and 1520923**

1 INTRODUCTION

Petro-Canada applied to the Alberta Energy and Utilities Board (EUB) for the following licences and permits:

- licences to drill eleven gas wells containing a maximum hydrogen sulphide (H₂S) concentration of 14.58 per cent from five different surface locations, pursuant to Section 2.020 of the *Oil and Gas Conservation Regulations (OGCR)*;
- licence to construct and operate one multiwell gas battery that would have a maximum H₂S content of 15 per cent, pursuant to Section 7.002(1) of the *OGCR*; and
- approval to construct and operate two pipelines that would have a maximum H₂S content of 15 per cent, pursuant to Part 4 of the *Pipeline Act*.

The purpose of the proposed wells, facility, and pipelines would be to obtain, process, and transport gas from the Rundle Group. The project would be located about 26 kilometres (km) west of the Town of Longview and about 0.3 km west of the west boundary of the Eden Valley Reserve No. 216.

For the eleven proposed wells, the maximum cumulative drilling, completion/servicing, and suspended/drilling H₂S release rate would be 0.59 cubic metres per second (m³/s), and the corresponding maximum emergency planning zone (EPZ) for each well would be 1.61 km. Detailed descriptions of the proposed wells, pipelines, and facility are in [Appendix 1](#).

A map showing the proposed location of the wells, the facility, and the pipeline route is attached as [Figure 1](#).

Effective January 1, 2008, the EUB was replaced by the Energy Resources Conservation Board (ERCB/Board) and the Alberta Utilities Commission. These applications are within ERCB's jurisdiction. In accordance with the transition provisions of the *Alberta Utilities Commission Act*, the decision regarding these applications shall be issued by the ERCB.

2 OBJECTIONS

The Board received objections from area landowners, residents, Eastern Slopes and Kananaskis associations and groups, the Stoney Nakoda First Nation, area grazing lease and allotment holders, outfitters and guides, area ranchers, the Municipal District (M.D.) of Ranchland No. 66, and wilderness camp and campground operators.

Intervening parties stated concerns about public safety and health; environment, including impacts on wildlife, flora, and fescue grasses, as well as air and water quality; impacts on ranching; cumulative impacts of development within the Kananaskis and Eastern Slopes region; and locations of the proposed pipelines, facility, and wells. In addition, they raised concerns regarding Petro-Canada's environmental assessment and its public consultation program for the proposed project.

3 PREHEARING MEETING

The Board held a prehearing meeting in order to determine the scope and issues to be considered at a hearing of the applications, the timing and location of the hearing, standing, intervener cost funding, and other procedural matters.

The prehearing meeting was held in Longview, Alberta, on March 18, 2008, before Board Members J. D. Dilay, P.Eng. (Presiding), G. J. Miller, and B. T. McManus, Q.C.

Those parties that participated at the prehearing meeting are listed in [Appendix 2](#).

The Board requested participants to express their views on the following matters:

- scope and purpose of the hearing,
- relevant issues to be examined,
- timing and location of the hearing,
- participants and their roles in the hearing,
- funding of the participants, and
- procedures to be used at the hearing.

4 ISSUES TO BE CONSIDERED AT THE HEARING

The Board finds the following issues to be relevant for consideration at the public hearing:

- public consultation
- definition of the public interest
- pipeline route
- environment
 - . wildlife
 - . habitat
 - . vegetation
 - . fescue grassland
 - . impact on rangeland
 - . air emissions
 - . noise

- . surface and ground water
- . cumulative environmental effects
- health and safety
 - . human health and safety, including recreational users
 - . animal health and safety
 - . emergency planning and response
- future development and cumulative impacts, as outlined in ERCB *Informational Letter 93-09: Oil and Gas Developments Eastern Slopes (Southern Portion)*
- socioeconomic impacts
 - . impacts on ranching
 - . impacts on outfitters, guides, and camping operations
 - . impacts on recreation
 - . impacts on the Stoney Nakoda First Nation
 - . competing land use

The Board does not consider the above list of issues of concern to be exhaustive and does not preclude the consideration of other relevant issues at the hearing.

4.1 Southern Foothills Land Study

Intervening parties argued that the *Southern Foothills Land Study* (the Study), coordinated by the Southern Alberta Land Trust Society, must be included as evidence at the hearing. Intervening parties referred to a January 29, 2008, letter written to some of them regarding this matter by Dr. William Tilleman, the then Acting Chairman of the EUB, which stated:

The Board has considered ... and determined that it would be appropriate to take into account the *Southern Foothills Land Study*, as evidence, during any ERCB hearing or consultation process it initiates in the study area. If the *Land Study* is relevant and material to a given application, it would be considered directly in the panel's reasoning. If it is more appropriate as a general recommendation to the government of Alberta, it could be used as a recommendation to the Department of Energy as well as the departments of Sustainable Resource Development, Environment, and Municipal Affairs.

Intervening parties requested the Board to provide direction as to how the Study could be introduced as evidence in the context of Petro-Canada's applications. These parties observed that this evidence could be brought forward by any interested party in the normal course of the proceeding or by the Board itself under Section 45 of the *Energy Resources Conservation Board Rules of Practice*.

Petro-Canada stated that it understood that the Study was an evolving study with multiple phases. It noted that two phases were complete and a third was in process, with the potential for additional phases to follow. Petro-Canada further stated its objection to what it characterized as a "predetermination of an evidentiary issue" without any input from directly affected parties. Additionally, Petro-Canada argued that any determinations on the admissibility of the Study were a matter of procedural fairness, which must be treated like any other evidence in a hearing.

Petro-Canada stated that the appropriate way to place the Study in evidence was for parties that considered it material and relevant to adduce it as evidence in the hearing process.

The Board is prepared to consider evidence with respect to the Study to the extent that it is relevant and material to the applications before it in this matter. However, the Board is of the view that the burden of establishing the applicability of the Study to a particular application lies with the parties. The Board finds that this approach is consistent with Dr. Tilleman's January 29, 2008, letter to interested parties and is in accord with the rules of procedural fairness and natural justice. In this respect, the Board leaves it to those parties that have asserted its relevance to decide whether to bring some or all of the Study before the Board and to establish its relevance to the applications.

4.2 Land Use Framework

Intervening parties stated that a hearing should not be scheduled until after the government of Alberta released its *Land Use Framework* policy (the Policy). They argued that the release of the Policy was imminent and that the new rules would significantly impact how competing land uses would be addressed within the Eastern Slopes and Kananaskis areas. They argued that because these areas are unique, it was in the public interest for the Board to adjourn the hearing until the release of the Policy.

Petro-Canada argued that the Board must not only take into account whether a project is in the public interest, having regard for social and economic effects and the effects on the environment, but it also must balance the public interest with the economic, orderly, and efficient development in the public interest of all oil and gas resources in Alberta. Petro-Canada stated that it had complied with and would continue to comply with all legislative and regulatory requirements. Petro-Canada further stated that it must continue to operate under the existing rules. Petro-Canada argued that no one knew at this stage what would be contained in the forthcoming Policy and that the formulation and implementation of the Policy would be a process that will take a significant period of time.

The Board notes that it is required to rule upon the Petro-Canada applications within the framework of current legislation and regulations until such time as the provincial government provides the Board with a revised mandate. In his January 29, 2008, letter, Dr. Tilleman clearly stated the following:

I have concluded that the ERCB must, due to jurisdictional obligations receive and process applications in the Eastern Slopes until the provincial government, who has the final say on the issuance of leases, sets a different "go or no go" moratoria policy.

Accordingly, the Board will proceed to schedule a hearing on the Petro-Canada applications. If, prior to the Board's final decision, the provincial government implements the Policy with specific changes to the ERCB's mandate for the area of application, the Board will take all necessary steps to ensure that such changes are respected.

5 STANDING AND INTERVENER COSTS

Section 26 of the *Energy Resources Conservation Act (ERCA)* provides that persons whose rights may be directly and adversely affected by a decision of the Board on an application are entitled to have their concerns fairly considered by the Board. The Board has adopted a two-part

test to identify those parties entitled to this right. The Board first determines whether a person has a legally recognized interest or right. It then considers whether the information provided by that person shows that the applications before the Board may directly and adversely affect that interest or right. When the Board determines that a party has a legally recognized right that may be affected by its decision, that party is considered to have “standing” to fully participate in the proceeding. Parties with standing are entitled to the following procedural rights pursuant to Section 26 of the *ERCA*:

- notice of the application,
- a reasonable opportunity to learn the facts bearing on the application and being presented to the Board by the applicant and other parties to the application,
- a reasonable opportunity to furnish evidence relevant to the application or in contradiction to it or in explanation of the facts or allegations in the application,
- if the person will not have a fair opportunity to contradict or explain the facts or allegations in the application without cross-examination of the person presenting the application, an opportunity to cross-examine in the presence of the Board or its examiners, and
- an opportunity to make representations by way of argument to the Board or its examiners.

A person who fails to qualify for standing under the Board’s two-part test is not entitled to the rights described above. However, it is the Board’s longstanding practice to allow persons without standing to have some degree of participation at a public hearing triggered by a party with standing, provided that they offer information that is relevant and material to the applications. The Board refers to such parties as discretionary participants. The Board determines whether to allow a party to appear as a discretionary participant and the scope of such participation on a case-by-case basis.

A person with standing may also be entitled to make a claim for local intervener costs under Section 28 of the *ERCA*. This section reads in part as follows:

28(1) In this section, “local intervener” means a person or a group or association of persons who, in the opinion of the Board,

(a) has an interest in, or

(b) is in actual occupation of or is entitled to occupy

land that is or may be directly and adversely affected by a decision of the Board in or as a result of a proceeding before it, but, unless otherwise authorized by the Board, does not include a person or group or association of persons whose business includes the trading in or transportation or recovery of any energy resource.

Part 5 of the *Energy Resources Conservation Board Rules of Practice and Directive 013A: Guidelines for Energy Cost Claims* provide details on the costs that may be recovered and the test and process used by the Board in determining cost awards.

A summary table reflecting the Board’s determination of standing and local intervener status is in [Appendix 3](#).

5.1 Parties With Standing

The Board finds that parties that reside within the EPZ for the project or who own or lease lands, including grazing leases, within the EPZ of the proposed project are entitled to standing. The Board also heard from a number of parties who asserted that their rights as grazing reserve users within the EPZ would be impacted by the Board's decision on the applications.

The Board understands that the provincial government, through the department of Sustainable Resource Development, has assigned the management of the grazing reserves cited at the prehearing meeting to grazing associations, pursuant to grazing management agreements. These grazing associations, in turn, have assigned specific grazing allotments within each reserve to its members. Each grazing association pays fees that include the equivalent to the annual grazing rental rate on other grazing dispositions on public land. While public access is allowed on grazing reserves and their respective allotments, that access is limited during grazing periods.

Petro-Canada questioned whether grazing reserve users had an interest in land such as contemplated in Section 28 of the *ERCA* and contended that the Board's cost decision in the Jumping Pound case¹ supported this view.

The Board observes that local interveners include parties with an interest in land and parties with a right or entitlement to occupy land. The Board is of the view that the cited grazing associations have the right to occupy their grazing reserves, pursuant to their grazing management agreements with the provincial government, and that individual members have the right to occupy their respective allotments, pursuant to the grants from the grazing associations. These parties pay the provincial government fees for this right and they have a limited right to exclude the public from these lands when they are being used for grazing. The Board notes that this form of occupation is consistent with other forms of occupation, as recognized by the Board in the Jumping Pound decision (*Decision D-83*, p.1):

... the Board believes that in giving a reasonable interpretation to the word "occupation", that word must be restricted to occupation or use of land, either present or future, where there is a legal right or claim to occupy or use the land... Persons who are entitled to use land, although they may not physically occupy the land for their own personal use, would include those having grazing leases, farming leases, forest management leases, or other similar types of arrangements or agreements.

The Board finds that holders of grazing allotments located within the EPZ have the right to occupy and use their respective allotments to graze their cattle and that these rights may be directly and adversely affected by the Board's decision on Petro-Canada's applications. Accordingly the Board finds that these parties have standing to participate in the hearing and are entitled to make claims for local intervener costs.

Having regard to all of the above, the Board finds that the following parties have each demonstrated that they have rights that may be directly and adversely affected by the Board's decisions on the applications:

- Big Loop Cattle Co. Ltd.

¹ ERCB *Decision D-83: Local Intervener Cost Hearing Respecting the Jumping Pound Gas Processing Plant, the Quirk Creek Gas Processing Plant, and the Proposed Moose and Whiskey Fields Pipeline Hearings.*

- Royal Adderson/Bar AD Ranches
- Stoney Nakoda First Nation
- Three Forks Cattle Company
- Indian Graves Campground
- Blue Bronna Wilderness Camp
- Alec C. Burke and family
- Stoney Trail Ranch
- Buffalo Head Ranch
- Bluebird Valley Ranch
- Mt. Sentinel Ranch Ltd.
- Rocking P Ranch
- The Pekisko Group (by virtue of the standing of two of its members, the Rocking P Ranch and the Mt. Sentinel Ranch)

Further, the Board considers that the rights asserted by these parties are interests in land that qualify these parties to apply for local intervenor costs.

5.2 Parties Without Standing and Discretionary Participants

Petro-Canada stated at the prehearing meeting that High Lonesome Ranch Limited owns 100 per cent of the shares of EP Ranch Ltd., which in turn is the registered owner of the southeast quarter of Section 25-16-4W5M. Petro-Canada acknowledged that EP Ranch Ltd. would have standing, as opposed to High Lonesome Ranch Limited. Given the information advanced by Petro-Canada and given that High Lonesome Ranch was not present at the prehearing meeting, the Board is unable to make a determination on its standing at this time. Should High Lonesome Ranch Limited wish to provide clarification on this matter, the Board would then be in a position to make its determination on standing.

With respect to Mr. Larry Dayment, the Board notes that he resides on the northeast quarter of Section 24-18-3W5M, about 14 km outside of the proposed project area. The Board also notes that Mr. Dayment did not identify a legal right or interest to the lands within the project area or advance any potential direct and adverse impacts. Therefore, the Board finds that Mr. Dayment does not have standing with respect to Petro-Canada's applications. However, the Board is prepared allow Mr. Dayment to make a brief submission of relevant information as a discretionary participant.

With respect to the Blue Ridge Outfitters, Defenders of Wildlife Canada, Full Circle Adventures, Francis Dover-Jackson, on behalf of the Priddis/Millarville Residents Association, Alberta Wilderness Association (AWA), and Leo D. Puerzer, the Board notes that none of these parties identified a legal recognized interest or right to the lands within the project area. However, the Board is prepared allow these parties to make brief submissions of relevant information as discretionary participants.

Mr. Gordon Cartwright, on behalf of the Cartwright D Ranch, stated in his written submission to the prehearing meeting that he was not seeking funding for the hearing, but requested that he be

allowed to participate during the hearing to present his concerns. The Board is prepared to allow Mr. Cartwright to make a brief submission of relevant information as a discretionary participant.

The M.D. of Ranchland (the M.D.) stated that a portion of the pipeline applied for by Petro-Canada was within its municipal boundaries. The M.D. raised the issue of the use of Highway 940 as a potential evacuation route and the impacts associated with having to keep that road open in the winter. The M.D. did not expand on this issue and did not otherwise identify specific legal rights or interest to lands within the project area or advance any other potential direct and adverse impacts associated with the project. Based upon the information provided, the Board is not satisfied that the M.D. has established the potential for direct and adverse effects on its rights. However, the Board is prepared to consider further information from the M.D. with respect to standing and local intervener status.

Dr. Tilleman's letter refers favourably to an increased role for municipal officials in any Eastern Slopes energy developments. In this vein, and recognizing that the M.D. would be involved in any emergency response associated with the proposed project should it be approved, the Board is prepared to allow the M.D. to fully participate in the proceeding.

5.3 Local Intervener Funding

None of the participants requested advance funding for the proceeding, but many expressed their intention to do so following the Board's determination of their status as local interveners. An intervener may file a request for advance intervener funding, in accordance with Sections 50 and 51 of the *Energy Resources Conservation Board Rules of Practice*. A budget of the intervener's anticipated costs must be submitted with the request for advance funding. The Board may award an advance of funds to an intervener if the intervener has demonstrated a need for financial assistance to address relevant issues in a hearing.

The Board has granted local intervener status to numerous parties and is concerned about the potential for duplication of efforts on common issues of concern. In this respect, the Board encourages interested parties to consult with each other and take proactive steps to avoid duplication of efforts.

6 TIMING AND LOCATION OF THE HEARING

The Board notes that the parties to the prehearing meeting proposed different schedules for the hearing. In determining the hearing schedule, the Board took into account Petro-Canada's availability and preference for a hearing in June or July 2008. It also heard the request by intervening parties that a hearing be scheduled outside of the calving, haying, and round-up seasons. In determining the location of the hearing, the Board considered the interveners' preference for the hearing to be held in Longview or a nearby community and Petro-Canada's suggestion that the hearing be held in a location that has sufficient infrastructure to accommodate all participating parties. The Board will schedule ten working days within a two-week period for the hearing.

The Board will hold a hearing into the applications in High River, Alberta, commencing on August 18, 2008.

Having regard for the opinions expressed by all parties, the Board directs the following schedule:

Hearing Schedule

Date	Action
July 21, 2008	Intervenors file submissions
August 1, 2008	Petro-Canada files a response to intervenor submissions
August 18, 2008	Hearing commences

The Board will issue Notice of Hearing in due course.

7 TRANSLATION

The Stoney Nakoda First Nation requested that the Board provide translation between English and the Stoney language. The Board does not directly provide translation services for any language. However, the Board will cooperate, as it has in other cases, to permit the Stoney Nakoda First Nation to provide such services if it requires it.

8 OTHER MATTERS

On April 8, 2008, the ERCB's revised edition of *Directive 071: Emergency Preparedness and Response Requirements for the Petroleum Industry* and the emergency planning and response zone calculation tool, the ERCBH2S dispersion model, came into effect. The release of this edition of *Directive 071* was accompanied by an implementation framework or plan, which states that for applications currently before the Board in a hearing process, the decision to require the applicant to recalculate its EPZ using the ERCBH2S model and/or rewrite its plan using the requirements outlined in *Directive 071* (April 2008) will be at the discretion of the Board and considered on a case-by-case basis.

Therefore, the Board directs that Petro-Canada adopt the ERCBH2S model and rewrite its emergency response plan (ERP) for the subject applications so that the plans will be compliant with all applicable April 2008 *Directive 071* requirements by **May 30, 2008**. The Board further directs that Petro-Canada submit the ERP and the ERCBH2S model calculations to the ERCB's Emergency Planning and Assessment Section for review. Petro-Canada is also directed to review its public consultation, technical requirements for pipelines, facilities, and wells, and environmental assessment and submit any changes resulting from the new ERP to the ERCB Facilities Applications Section for review.

The ERCB will schedule an information session to be held in Longview, Alberta. The ERCB will invite all interested parties to attend the information session to review the ERCB's hearing process and the rules for intervenor funding. The purpose of this session will be to provide information intended to enable the public to engage effectively in the hearing process. ERCB staff will provide information on how the public can obtain further information on the applications, but they will not discuss the details of Petro-Canada's applications.

Notice of such an information session and its timing and location will be provided to interested parties in due course.

Dated in Calgary, Alberta, on April 16, 2008.

ENERGY RESOURCES CONSERVATION BOARD

<original signed by>

J. D. Dilay, P.Eng.
Presiding Member

<original signed by>

B. T. McManus, Q.C.
Board Member

<original signed by>

G. J. Miller
Board Member

APPENDIX 1 APPLICATIONS

Application No. 1520388 for one multiwell gas battery, proposed to be constructed at a surface location in Legal Subdivision (LSD) 11 of Section 8, Township 17, Range 4, West of the 5th Meridian. The maximum H₂S content of the inlet gas would be 150 moles per kilomole (mol/kmol) (15.0 per cent), with a maximum continuous sulphur emission rate of 0.02 tonnes per day and an EPZ radius of 5.47 km.

Application No. 1513051 for one pipeline to transport natural gas from a proposed well at LSD 10-2-18-5W5M and tie into an existing pipeline at LSD 2-22-14-4W5M. The proposed pipeline would be about 56.57 km in length, with an outside diameter (OD) ranging from 88.9 millimetres (mm) to 273.1 mm. The pipeline would also include line sections to tie in existing and proposed wells. The proposed pipeline would transport natural gas with a maximum H₂S content of 150 mol/kmol (15.0 per cent). The resulting calculated EPZ radius for the pipeline segments would range from 0.1 km to 6.09 km. This application also includes one pipeline to transport natural gas from an existing pipeline tie-in at LSD 2-22-14-4W5M to a proposed well at LSD 10-2-18-5W5M. The pipeline would be about 56.57 km in length, with an OD ranging from 60.3 mm to 88.9 mm. The proposed pipeline would transport natural gas with a maximum H₂S content of 0.0 mol/kmol (0.0 per cent) and would be constructed parallel to the above proposed pipeline. The pipeline would also include line sections to tie in existing and proposed wells. In addition to the above pipelines, this application includes an alternative route for each of the above proposed pipelines. The alternative pipeline route would be about 56.37 km in length, and the starting and ending points, OD, and substances would remain the same; however, the alternative pipelines route would have a number of alignment differences from the applied-for route.

Applications No. 1517148 and 1520922 for two directional gas wells proposed to be drilled from an existing surface location in LSD 10-25-17-5 W5M to projected bottomholes located in LSD 2-25-17-5W5M and LSD 7-25-17-5W5M.

Application No. 1517151 for one directional gas well proposed to be drilled from a surface location in LSD 2-19-17-4W5M to a bottomhole location in LSD 12-18-17-4W5M. This surface location would be the same surface as for Applications No. 1517160 and 1520923, as the surface location is bisected by the LSD boundary.

Applications No. 1517160 and 1520923 for two directional gas wells proposed to be drilled from a surface location in LSD 3-19-17-4W5M to bottomhole locations in LSD 16-24-17-5W5M and LSD 5-19-17-4W5M. This surface location would be the same as for Application No. 1517151, as the surface location is bisected by the LSD boundary.

(Note: Applications No. 1517151, 1517160, and 1520923 would be drilled from the same surface location, which is bisected by the boundary of LSDs 2 and 3.)

Applications No. 1517158, 1517161, and 1517162 for three directional gas wells proposed to be drilled from a common surface location in LSD 10-2-18-5W5M to bottomhole locations in LSD 13-36-17-5W5M, LSD 2-11-18-5W5M, and LSD 6-2-18-5W5M.

Applications No. 1517168 and 1517170 for two directional gas wells proposed to be drilled from an existing surface location in LSD 6-15-18-5W5M to bottomhole locations in LSD 2-11-18-5W5M and LSD 4-22-18-5W5M.

Application No. 1517176 for one directional gas well proposed to be drilled from an existing surface location in LSD 7-7-17-4W5M to a bottomhole location in LSD 7-6-17-4W5M.

APPENDIX 2 HEARING PARTICIPANTS

Principals (Abbreviations used in report)	Representatives
Petro-Canada	W. Corbett, Q.C. S. Christensen
Big Loop Cattle Co. Ltd.	S. Carscallen, Q.C. B. Carscallen
Royal Adderson and Bar AD Ranches Ltd.	G. Fitch D. Farmer
Stoney Nakoda First Nation	O. MacLaren
Municipal District of Ranchland No. 66	C. Gardner
The Pekisko Group	F. Gardner
Mt. Sentinel Ranch Ltd.	F. Gardner
Rocking P Ranch	F. Gardner (for M. Blades)
Cartwright D Ranch	F. Gardner (for G. Cartwright)
Bluebird Valley Ranch	H. Gardner
Stoney Trail Ranch	J. Bews
L. Dayment	L. Dayment
Indian Graves Campground	R. Dejonge
Blue Bronna Wilderness Camp	J. Ould
Priddis/Millarville Residents Association	F. Jackson-Dover
Defenders of Wildlife Canada	J. Pissot
Full Circle Adventures	J. Walker
Nelson Family of Three Forks Cattle Company and Blue Ridge Outfitters	K. Nelson
Energy Resources Conservation Board staff J. P. Mousseau, Board Counsel T. Grimoldby, Board Counsel M. Douglas, C.E.T. G. McLean, C.E.T.	

STANDING AND LOCAL INTERVENER STATUS

Party	Right or Interest Asserted (within the EPZ)	Standing	Local Intervener	Discretionary Participation
Big Loop Cattle Co. Ltd	Grazing lease and grazing allotment	Yes	Yes	
Royal Adderson/Bar AD Ranches	Freehold land, holds grazing lease and grazing allotment	Yes	Yes	
Stoney Nakoda First Nation	IR 216 (Eden Valley) residences	Yes	Yes	
Three Forks Cattle Company	Grazing lease and grazing allotment	Yes	Yes	
High Lonesome Ranch Limited	Freehold land	Undetermined	Undetermined	
Indian Graves Campground	Government lease to operate campground	Yes	Yes	
Blue Bronna Wilderness Camp	Government lease to operate campground	Yes	Yes	
Alec C. Burke and family	Freehold land and residence	Yes	Yes	
Stoney Trail Ranch	Grazing allotment	Yes	Yes	
Bluebird Valley Ranch	Grazing allotment	Yes	Yes	
Mt. Sentinel Ranch Ltd.	Grazing allotment	Yes	Yes	
Rocking P Ranch	Grazing allotment	Yes	Yes	
Buffalo Head Ranch	Grazing allotment	Yes	Yes	
The Pekisko Group	Grazing allotment*	Yes	Yes*	
Blue Ridge Outfitters	No land or interests	No	No	Yes
Larry Dayment	No land or interests	No	No	Yes
M.D. of Ranchland No. 66	No land or interests	No	No	Yes
Defenders of Wildlife Canada	No land or interests	No	No	Yes
Full Circle Adventures	No land or interests	No	No	Yes
Francis Dover-Jackson/ Priddis/Millarville Residents Association	No land or interests	No	No	Yes
Cartwright D Ranch	No land or interests	No	No	Yes
Alberta Wilderness Association	No land or interests	No	No	Yes
Leo D. Puerzer	No land or interests	No	No	Yes

* The grazing allotment and local intervener status are assigned by virtue of the standing of two of its members, the Rocking P Ranch and the Mt. Sentinel Ranch.

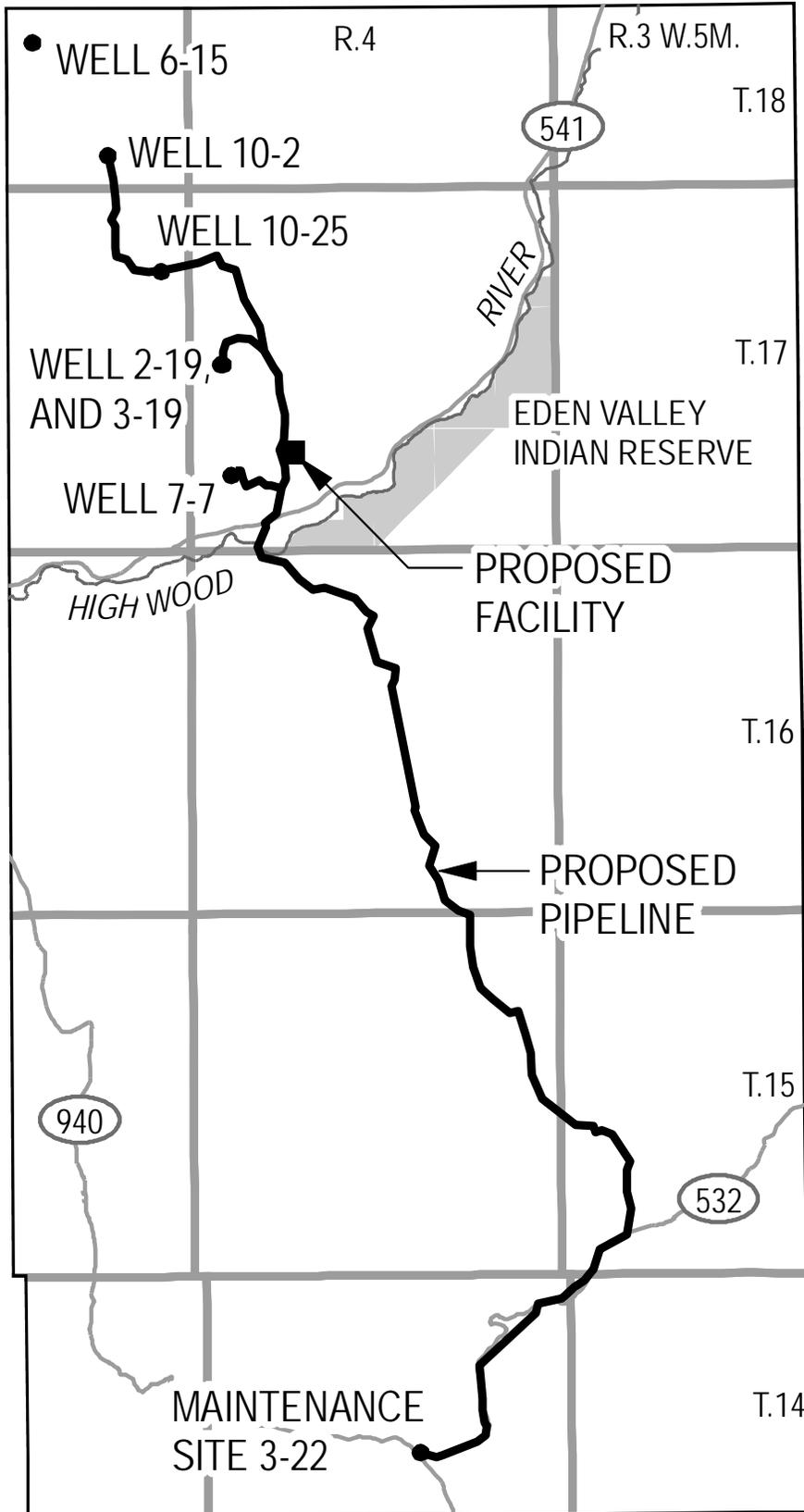


Figure 1. Petro-Canada Sullivan Area Project