



County of Vermilion River Gas Utility

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Hon. Todd Loewen
Minister, Alberta Forestry and Parks

Re: Public Land Disposition Application Processing Time

Dear Minister Loewen;

The County of Vermilion River would like to bring to your attention, and request assistance in reducing, the length of time in processing applications by the Ministry of Forestry and Parks for Pipeline Dispositions on Public Lands. While we appreciate the need for robust review and consultation processes, we have experienced unreasonable processing times, in some cases over a full year in review. This has resulted in several projects being cancelled by customers during the application process.

The County of Vermilion River is a natural gas distributor delivering gas to farms, residences, commercial and oilfield facilities. In addition to gas distribution, we work extensively with oil and gas producers in gathering and utilization of excess methane reducing flaring and venting in the region. In 2024 we gathered 1.8 Million GJ of excess natural gas. This volume of excess gas would represent over 126,000 tCO₂e in emissions if flared or 810,000 tCO₂e if vented to atmosphere.

A majority of the pipelines we operate on Public Lands are constructed to service approved oil and gas wells on the same public lands. Our pipeline systems are small diameter (<4”), low pressure (<1380 kPa), sweet natural gas pipelines. We install using low ground disturbance utility plowing and directional bore and typically follow existing lease roads and trails, with little to no brushing or effect on vegetation or habitat. Our pipelines are low risk and high benefit. The unintended consequence of delay/cancellation is increased traffic in trucking propane and increased venting or flaring of excess methane.

We have not experienced significant delays with Pre-Application Requirements including Environmental Studies, First Nations, Leaseholder or Public Consultations. We have found departmental reviews to be the main cause of delay in approval. Attached is summary of timelines on recent Applications and a detailed timeline of a current Application which remains under merit review by the Ministry. Throughout each of the application processes in the attachment we requested status updates throughout. Typically, we do not receive any substantial communication in terms of status or expected timelines, simply that the Application is still “under review”.

We appreciate you taking the time to review this matter and await your response.

Sincerely,

Marty Baker
Reeve, County of Vermilion River

Application	Description	Pre-Application Start	Pre-Application Complete	Application Submission	Application Approval
DPL240009	0.75 km Fuel Gas Supply (2") <i>Customer cancelled the project in fall 2024</i>	November 2023	April 2024	April 2024	
DPL210002	2 km Excess Gas Gathering Pipeline (2")	February 2021	March 2021	March 2021	May 2022
DPL210009	3 km Excess Gas Gathering Pipeline (2") <i>Customer cancelled the project in late 2021</i>	January 2021	June 2021	June 2021	
DPL190006	1.5 km Fuel Gas Supply	July 2018	March 2019	March 2019	August 2019

DPL240009 – Application Timeline	
Action	Date
Adequacy Assessment application	October 2023
Request for more information from Aboriginal Consultation Office	October 2023
Resubmitted information for Aboriginal Consultation	October 2023
Completed Environmental Supplement and LAT report	Nov 2023
Emailed ACO requesting update Dec 14/23 she is out of office until Jan 8/24	Dec 2023
Received First Nations Consultation Adequacy	April 2024
Submitted Application DPL 240009	Apr 2024
Letter from Alberta Forestry and Parks stating application meets all requirements and is now subject to Departmental Merit Review	May 2024
Emailed Ministry of Forestry and Parks requesting update on Application. Notified that it is still with the Regional Land Officer for merit Review	January 2025