

Summary of the request to the NEB from Citoyens au Courant (Octobre 29 2015)

Citoyens au Courant (CaC) dispute the September 30 2015 decision by the National Energy Board (NEB) to approve the results of the hydrostatic tests ordered on June 18 2015 and carried out according to conditions 1 and 2 of the order AO-001-MO-045-2015. They request that this decision and the related decisions of June 18 and July 27 be reviewed for the following reasons:

1) The NEB did not respect the minimum Canadian standard (CSA-Z662) for hydrostatic tests, a standard that applies to new and existing pipelines, and does not allow for exceptions regarding the reason for carrying out these tests. This standard requires a strength test of at least 125% of the maximum operating pressure (MOP) for at least 4 hours, whereas the NEB ordered a test to 125% MOP for only 1 hour.

2) The NEB did not follow its own recommendations to promote public safety, as set out in its public enquiry into stress corrosion cracking (SCC) in canadian oil pipelines ([link](#)), a defect present in pipeline 9. This enquiry was triggered by a series of major ruptures caused by SCC. One of its recommendations was to incorporate, in the next edition of CSA Z662 Oil and Gas Pipeline Systems standard, requirements for hydrostatic retesting as an option for maintaining pipeline integrity. Such a consideration would likely entail the recurring use of hydrostatic testing to maintain pipeline integrity. By using hydrostatic tests as a means to validate internal inspections of pipeline 9B, the NEB ignored its recommendation;

3) The NEB has not explained to the public nor to elected representatives from areas directly affected by the project the impact on public safety of its July 27 2015 decision to lower the pressure of the hydrostatic tests. Yet, CaC showed in their August 19 2015 request to NEB for administrative review that this pressure drop would significantly shorten the pipeline time-to-failure.

Therefore, CaC respectfully ask the NEB to: 1) review its September 30 2015 decision and those decisions linked to it (June 18 and July 27). They request a response from the NEB to their letters dated September 28 2015 and an explanation as to why on June 18th it ordered a hydrostatic tests at a higher pressure to limit crack growth. They also ask the NEB to explain to the public and elected representatives the impact of the lower pressure used for the tests on the safety margin for pipeline operation. Finally, they ask the NEB to order a hydrostatic test at the pressure ordered on June 18th, and on the entire length of pipeline 9B, to ensure its integrity before being put into service.