# AltaGas Utilities

# Emergency Management Guide and Emergency Management Plan Review

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Prepared For:

## The Alberta Utilities Commission

Prepared By

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## STATEMENT OF WORK

*The consultant is to review and provide a written report respecting AltaGas Utilities 2014 manuals that addresses emergency response plans. The report should address the degree to which the manuals comply with legislation and standards including, but not limited to Sections 7 and 8 of the Pipeline Regulation, CSA Z662-11: Oil and Gas Pipeline Systems including Annex N, CSA Z731 Emergency Preparedness and Response and CSA Z1600 Emergency Management and Business Continuity. Recommendations to alleviate any deficiencies identified with the procedural manual are to be provided.*

## SCOPE

The following report addresses the compliance of AltaGas Utilities Emergency Management Guide and Emergency Management Plan to the requirements of:

*CSA Z1600-08 Emergency management and business continuity programs*

*CSA Z731-03 Emergency Preparedness and Response*

*AER Directive 071[1] Emergency Preparedness and Response Requirements for the Petroleum Industry*

*Note: This report references AER Directive 071 - Revised November 18, 2008. The AER has prepared a draft update of Directive 071, which was open to feedback until January 15, 2013.*

The reports focus is on gas utility pipelines operated in excess of 700 kilopascals operating within the province of Alberta. The construction and operation of gas utility pipelines, operated in excess of 700 kilopascals, is regulated by the Alberta Utilities Commission.

The document used in the review was AltaGas Utilities Emergency Management Guide and Emergency Management Plan, revision January 20, 2014.

## METHODOLOGY

AltaGas Utilities Emergency Management Guide and Emergency Management Plan were reviewed to the requirements of *CSA Z1600-08, CSA Z731-03* and *AER Directive 071*.

Policies, procedures and methods, both externally referenced and contained within the Emergency Management Guide and Emergency Management Plan were categorized and evaluated as per the Standard or Directive.

The review's focus is to verify that AltaGas Utilities has documented policies, processes and procedures in place to manage the requirements of *CSA-Z1600-08, CSA-Z731-03* and *AER Directive 071.*

*Policy— a high-level statement of the overall intentions and directions of an organization.*

*Process— a series of activities, tasks, decision points, and resources to support a policy.*

*Procedure— a documented series of steps followed in a definite order to carry out an activity.*

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[1] *Section 8 of the Pipeline Regulation requires that the licensee of a pipeline prepare and maintain a corporate emergency response plan in accordance with the requirements of AER Directive 071.*

## REVIEW SUMMARIES

*Note: The following documents referenced in the AltaGas Emergency Management Plan & Emergency Management Guide, were not reviewed and may address deficiencies outlined in this report:*

- *Emergency Management Guide 1.7 - Emergency Reporting Card*
- *Emergency Management Plan 3.2 - Existing Mutual Aid Agreements*
- *Emergency Management Guide 15.1 - Occupational Health and Safety Management Manual*
- *Emergency Management Guide 5.3 - Regional Call List*
- *Emergency Management Guide 8.0 - AUI Reporting Chain Card*
- *Emergency Management Guide 1.8 - Documents and Records Management Procedure*
- *Emergency Management Guide 6.7 - Documents for services provided by Quantum Murray Emergency Response*
- *Emergency Management Guide 7.1 – AUI's communication process with regulators*
- *Emergency Management Plan Appendix "D" Building & Facility / Site Drawings*
- *Emergency Management Plan Appendix "E" Forms*
- *Emergency Management Plan Appendix "F" AltaGas' Crisis Communication Matrix*
- *Emergency Management Plan Appendix "G" Risk Assessment Matrix*

### CSA-Z1600-08 Emergency Management and Business Continuity Programs Review

Areas not addressed in AltaGas Utilities Emergency Management Guide & Emergency Management Plan include:

4.4.6   Records management – No evidence of a procedure outlining records management procedure including scope, where records are stored, who is responsible for the storage, procedure for retrieval of documents, etc.
6.2   Resource management – No evidence of specific resources including names, phone numbers and agreements in place prior to an emergency.
6.3   Mutual aid/mutual assistance – No evidence of mutual aid agreements
6.6   Communications and warning – No evidence of procedures for public warning, public awareness

### CSA-Z731-03 Emergency Preparedness and Response Review

Areas not addressed in AltaGas Utilities Emergency Management Guide & Emergency Management Plan include:

4.8   Resources - No evidence of specific resources including names, phone numbers and agreements in place prior to an emergency.
4.10   Mutual Aid Agreements - No evidence of mutual aid agreements
4.11   Contact List – No evidence of specific resource information including; names, contact information, existing agreements etc.
4.13   Public Education and Information - No evidence of procedures of documentation of activation details, resource mobilization, notification/reporting and debriefing records.
5.2   Emergency Response Records - No evidence of specific resources including names, phone numbers and agreements in place prior to an emergency.
5.4.5   Resource Mobilization - No evidence of specific resources including names, phone numbers and agreements in place prior to an emergency.
5.4.6   Notification and Reporting – No evidence of procedures for external reporting.
5.4.9   Public Communications – No evidence of a procedure or process
5.4.11   End of Emergency – No evidence of procedure or process
6.2   Equipment Inspection and Maintenance - No evidence of procedure or process
6.3   Exercises- No evidence of procedure or process
6.7   Audit- No evidence of procedure or process

**AER Directive 071 – Emergency Preparedness and Response Requirements for the Petroleum Industry Review**

2.1      Corporate–level ERP Requirements
2.1      Key licensee contacts – Emergency Reporting Chain Card not provided or reviewed.
2.1      Communications Plan – Crisis Communication Matrix not provided or reviewed
2.1      Activation of a reception centre – No evidence of a procedure or process
2.1      No evidence of procedure or policy to ensure 24 hour emergency telephone at facilities
2.1.1    Assessment Matrix for Classifying Incidents EMP Table 1 not aligned with Directive 71 Appendix 4
2.1.2    Communications Planning – Crisis Communication Matrix not provided or reviewed
2.1.5    Reception Centre – No evidence of procedure or process
5.1      Assessment Matrix for Classifying Incidents EMP Table 1 not aligned with Directive 71 Appendix 4
5.4      Equipment List - No evidence of procedure or process
5.5      Mutual Aid - No evidence of procedure or process
5.6      Telephone Lists - Crisis Communication Matrix, Emergency Reporting Chain Card and Regional Call Lists not provided or reviewed.
5.6      No evidence of external emergency support service telephone lists
5.8      Communications Planning - Crisis Communication Matrix, Emergency Reporting Chain Card and Regional Call Lists not provided or reviewed.
5.8      Overlapping ERP alignment - No evidence of procedure or process
5.9      Responsibility of Personnel - Crisis Communication Matrix, Emergency Reporting Chain Card and Regional Call Lists not provided or reviewed.
5.11     Record Keeping – EMP Appendix "E" Forms and Document and Records Management Procedure not provided or reviewed.
5.11     No evidence of procedures for documentation of activation details and resources mobilization, notification/reporting and debriefing.
5.12     Reception centre - No evidence of procedure or process
5.13     Downgrading and Stand-down of Emergency Levels - No evidence of procedure or process
10.      Spill Cooperative Response Plans – Quantum Murray Emergency Response Spill Program not provided or reviewed
14.5.1   Plan Management Process – Emergency Management Plan requires semi-annual review

## GUIDANCE

**Emergency Preparedness and Response**

The *Pipeline Regulations, Part 1 Administration, Section 8(1)  "A licensee of a pipeline shall prepare and maintain a corporate emergency response plan in accordance with the requirements of Directive 071 and shall submit a copy to the Board for review on request."*

Directive 71 Section 1.3 Licensee Responsibility

> *"Licensees have a responsibility to ensure that they are fully prepared and capable of responding to any level of emergency. Emergency preparedness and response includes all activities done **prior** to an emergency so that designated personnel are ready and able to respond quickly and appropriately, as well as those activities that take place during the incident. This includes activities such as*
>
> - *identifying hazards,*
>
> - *preparing and maintaining ERPs and response procedures,*
>
> - *ensuring that the ERPs identify sufficient resources and equipment for use by response personnel during an emergency, and*
>
> - *designating response personnel and ensuring that they are suitably equipped to carry out their duties through training, drills, and exercises.*

**Emergency Management and Business Continuity**

The *National Strategy and Action Plan for Critical Infrastructure, Section 4. "The Strategy"*

*"The Strategy proposes that federal, provincial and territorial governments and critical infrastructure sectors collaborate to strengthen the resiliency of critical infrastructure in Canada.*

*The strategy recognizes that primary responsibility for strengthening the resiliency of critical infrastructure rests with the owners and operators.*

*….at the national level, the Strategy classifies critical infrastructure within the 10 sectors listed below:*

| | |
|---|---|
| ***Energy and utilities*** | *Information and communication technology* |
| *Finance* | *Health* |
| *Food* | *Water* |
| *Transportation* | *Safety* |
| *Government* | *Manufacturing* |

The *Government Emergency Management Regulation, Section 2 Responsibilities of the Alberta Emergency Management Agency2(1) " The Agency shall (f) require departments, in consultation with the Agency, (i) to prepare, implement and maintain, in accordance with the Government plans, consequence management plans, business continuity plans and any other plans required by a responsible Minister."*

*Emergency response plan (ERP) — a document developed to ensure quick access to the information necessary for effectively responding to an emergency.  - CSA Z731-03*

## RECOMMENDATIONS

1.  Address issues outlined in the Review Summaries

2.  Revise Emergency Management Plan to better fit the CSA Z731-03 definition, this can be achieved by removing redundancies between the Guide and Plan, ensuring all support documentation is easily accessible within the specific Emergency Response Plans.

3.  Consider separating Business Continuity aspects of the Emergency Response Guide and Plan into a Business Continuity Program.

**AltaGas Utilities Emergency Management Guide - Table 1**
**CSA-Z1600-08 Emergency Management and Business Continuity Programs Review**

| CSA-Z1600-08 | AltaGas Utilities EMG Policies, Methods and Procedures | Comments |
|---|---|---|
| **1. Scope** | | N/A |
| **2. Reference publications** | | N/A |
| **3. Definitions** | | N/A |
| **4. Program management** | | |
| 4.1 Leadership and commitment | EMG 1.4 Greg Johnston, President AltaGas Utilities Inc.<br>EMP 1.4 Greg Johnston, President AltaGas Utilities Inc. | |
| 4.2 Program coordinator | EMG 5.3 VP Operations and Engineering or his/her delegate | |
| 4.3 Advisory committee | EMG 1.7,6.1, 6.2, 6.3 Overview "Emergency Planning Committee"<br>EMP 1.7, | |
| 4.4 Program administration | | |
| 4.4.1 General | EMG 1.1 Purpose/Objectives<br>EMP 1.1 Purpose/Objectives/Methodology | |
| 4.4.2 Policy | EMG 1.5 Definitions - Responsibilities<br>EMG 1.1 Purpose/Objectives<br>EMP 1.1 Purpose/Objectives/Methodology<br>EMG 5.0 Emergency Management Organization<br>EMP 2.0 Emergency Management Organization | |
| 4.4.3 Program goals and objectives | EMG 1.1 Purpose/Objectives<br>EMP 1.1 Purpose/Objectives/Methodology | |
| 4.4.4 Program plan and procedures | EMG Section 3.0 Hazard – Specific Roles and Procedures | |
| 4.4.5 Program Budget | EMG & EMP 1.4 Emergency Management Commitment | |
| 4.4.6 Records management | EMG 1.8 Document and Records Management<br>EMG 11.0 Documentation<br>EMG Appendices<br>EMP 4.0 Checklists and Function Aids | <span style="color:red">EMG 1.8 "documents shall be properly retained" no indication of procedure for document retention.<br>Note: EMP Appendix "E" not complete.<br>No evidence of a records index.</span> |
| 4.4.7 Program review | EMG 1.7 Guide Review/Update<br>EMG 1.7 External Review of Emergency Management Guide and Plan | |
| 4.5 Laws and authorities | EMG & EMP 1.4 Emergency Management Commitment<br>EMG 1.1 Methodology | |
| 4.6 Financial management | EMG & EMP 1.4 Emergency Management Commitment<br>EMG 14.0 Recovery/Resumption | |
| **5. Planning** | | |
| 5.1 Hazard identification, risk assessment, and business impact analysis | EMG 6.8 Hazard Analysis<br>EMP 3.0 Hazard – Specific Roles and Procedures<br>Hazard Risk and Vulnerability Assessment (HRVA)<br>EMG 9.0 Action Planning | |
| 5.1.1 Hazard identification | | |
| 5.1.2 Risk assessment | | |
| 5.1.3 Business impact analysis (BIA) | | |
| 5.2 Planning process | | |
| 5.3 Common plan requirements | | |
| **6. Implementation** | | |
| 6.1 Prevention and mitigation | EMP 3.0 Hazard – Specific Roles and Procedures<br>Hazard Risk and Vulnerability Assessment (HRVA)<br>EMG 9.0 Action Planning | |

| | | |
|---|---|---|
| 6.1.1 General | | |
| 6.1.2 Prevention | EMG 6.0 Preparedness | |
| 6.1.3 Mitigation | EMG 9.0 Action Planning | |
| 6.2 Resource management | EMG 10.0 Resource Management<br>EMG 12.0 Administration<br>EMP 6.0 Regional Emergency Resources | EMP Section 6.0 provides consideration of examples but does not provide for specific resources needed to ensure appropriate response for the identified hazards.<br>EMG 1.7 makes reference to "Emergency Reporting Card" document not provided or reviewed. |
| 6.3 Mutual aid/mutual assistance | References to mutual aid throughout EMG and EMP "i.e. EMP 3.20 "Existing Mutual Aid Agreements" | No evidence of mutual aid agreement |
| 6.4 Emergency response | EMG 4.0 Emergency Response Management System | |
| 6.4.1 Strategy | | |
| 6.4.2 Plan | | |
| 6.5 Incident management | EMG 5.0 Emergency Management Organization<br>EMP 3.0 Hazard – Specific Roles and Procedures | |
| 6.6 Communications and warning<br>6.6.1 Assessment and coordination<br>6.6.2 Systems<br>6.6.3 Procedures<br>6.6.4 Public warning<br>6.6.5 Public awareness<br>6.6.6 Emergency information<br>6.6.7 Crisis communications capability | EMG 10.0 Resource Management<br>EMG 13.0 Media and Public Relations<br>EMP Appendix F AltaGas' Crisis Communication Matrix<br>Numerous references to " AltaGas Ltd. Crisis Communications Group"<br>EMP 4.3 "appropriate public information actions"<br>EMP 6.0 Regional Emergency Resources | No evidence of EMP Appendix F<br>No evidence of methods or procedures of Crisis Communications Group.<br>Guidelines for communication systems other than cellular or land phones.<br>No evidence of methods or procedures of "appropriate public information actions."<br>Physical communication resources are referenced as guidelines only and may not physically exist.<br>No evidence of methods or procedures for public warning.<br>No evidence of policy, method or procedures for public awareness program. |
| 6.7 Operational procedures | EMP 3.0 Hazard – Specific Roles and Procedures | |
| 6.8 Facilities | EMG 2.0 Incident Command System<br>EMG 5.0 Emergency Management Organization<br>EMP 2.0 Emergency Management Organization Operations Centre | |
| 6.9 Training | EMG 2.3 Ongoing Validation and Training<br>EMG 6.4 Training Program – Internal<br>EMG 6.5 Liaison (1st Responders) and Continuing Education Programs | |
| 6.10 Business continuity | EMG 1.1 Purpose/Objective<br>EMG 14.0 Recovery/Resumption<br>EMP 3.0 Hazard – Specific Roles and Procedures | |
| 6.11 Recovery | EMG 14.0 Recovery/Resumption<br>EMP 3.0 Hazard – Specific Roles and Procedures | |
| **7. Exercises, evaluations and corrective actions** | | |
| | EMG 15.0 Post Incident Investigations | Occupational Health and Safety Management Manual is referenced but not reviewed as part of this report. |
| **8. Management review** | | |
| | EMG 1.6 Guide Review/Update<br>EMG 2.3 Ongoing Validation and Training<br>EMG 6.2 Function | |

**AltaGas Utilities Emergency Management Guide - Table 2**
**CSA-Z731-03 Emergency Preparedness and Response Review**

| CSA-Z731-03 | AltaGas Utilities EMG Policies, Methods and Procedures | Comments |
|---|---|---|
| **1. Scope** | | N/A |
| **2. Reference publications** | | N/A |
| **3. Definitions and Abbreviations** | | N/A |
| **4. Organization and Data Collection** | | |
| 4.1 Emergency Preparedness | EMG<br>EMP | |
| 4.2 Policy Statement | EMG 1.4 Greg Johnston, President AltaGas Utilities Inc.<br>EMP 1.4 Greg Johnston, President AltaGas Utilities Inc. | |
| 4.3 Program Coordinator | | |
| 4.3.1 General | EMG 5.3 VP Operations and Engineering or his/her delegate | |
| 4.3.2 Authority | | |
| 4.3.3 Consultation | EMG 1.7,6.1, 6.2, 6.3 Overview "Emergency Planning Committee" | |
| 4.3.4 Committee | | |
| 4.4 Hazard Identification | EMG 6.8 Hazard Analysis<br>EMP 3.0 Hazard – Specific Roles and Procedures<br>Hazard Risk and Vulnerability Assessment (HRVA)<br>EMG 9.0 Action Planning | |
| 4.5 Emergency Response Plan (ERP) Development | EMG 6.8 Hazard Analysis<br>EMP 3.0 Hazard – Specific Roles and Procedures<br>Hazard Risk and Vulnerability Assessment (HRVA)<br>EMG 9.0 Action Planning | |
| 4.6 Legislation and Industry Codes of Practice | EMG 1.1 Methodology<br>EMP 1.1 Methodology | |
| 4.7 Roles and Responsibilities | EMP 3.0 Hazard – Specific Roles and Procedures | |
| 4.8 Resources | EMG 10.0 Resource Management<br>EMP 6.0 Regional Emergency Resources | EMP Section 6.0 provides consideration of examples but does not provide for specific resources needed to ensure appropriate response for the identified hazards. |
| 4.9 Emergency Response Procedures | EMP 3.0 Hazard – Specific Roles and Procedures | |
| 4.10 Mutual Aid Agreements | References to mutual aid throughout EMG and EMP "i.e. EMP 3.20 "Existing Mutual Aid Agreements" | No evidence of mutual aid agreement |
| 4.11 Contact List | EMP 6.0 Regional Emergency Resources | EMP Section 6.0 provides consideration of examples but does not provide for specific resource names and contacts needed to ensure appropriate response for the identified hazards. |
| 4.12 Communication System | EMG 10.0 Resource Management<br>EMG 13.0 Media and Public Relations<br>EMP Appendix F AltaGas' Crisis Communication Matrix<br>Numerous references to " AltaGas Ltd. Crisis Communications Group" | No evidence of EMP Appendix F<br>No evidence of methods or procedures of Crisis Communications Group.<br>Guidelines for communication systems other than cellular or land phones. |
| 4.13 Public Education and Information | EMP 4.3 "appropriate public information actions"<br>EMP 6.0 Regional Emergency Resources<br>EMP Appendix F AltaGas' Crisis Communication Matrix | No evidence of methods or procedures of "appropriate public information actions."<br>Physical communication resources are referenced as guidelines<br>No evidence of methods or procedures for public warning. |

| | | | No evidence of policy, method or procedures for public awareness program.<br>No evidence of EMP Appendix F |
|---|---|---|---|
| **5. Emergency Response** | | | |
| | 5.1 General | EMG<br>EMP | |
| | 5.2 Records | EMG 1.8 Document and Records Management<br>EMG 11.0 Documentation<br>EMG Appendices<br>EMP 4.0 Checklists and Function Aids | Note: EMP Appendix "E" Forms not complete. Document and Records Management Procedure referenced but not provided for review.<br><br>EMG 1.8 Procedures or documentation of activation details, resource mobilization, notification/reporting and debriefing records not provided for review. |
| | 5.2.1 General | | |
| | 5.2.2 Types of Records | | |
| | 5.2.3 Reasons for Record Retention | | |
| | 5.3 Incident Management | EMG 2.0 Incident Command System<br>EMG 2.4 Incident Command Post<br>EMG 2.5 Emergency Operations Centre | |
| | 5.3.1 General | | |
| | 5.3.2 Facilities | | |
| | 5.4 Coordinated Response | EMG 2.4 Incident Command Post<br>EMG 2.5 Emergency Operations Centre<br>EMP 2.0 Emergency Management Organization | |
| | 5.4.1 General | EMG 7.0 Plan Activation and Termination | |
| | 5.4.2 Activation of the ERP | EMP 2.2 Notification Mechanisms<br>EMG 5.0 Emergency Management Organization<br>EMG 5.4 Regional Emergency Operations Centre<br>EMG 5.5 District Emergency Operations Centre<br>EMG Section 16 Appendix A – Emergency Check Lists | EMG 5.4 Regional "call lists" not provided for review |
| | 5.4.3 Situational Assessment | | |
| | 5.4.4 Action Plan | EMG 9.0 Action Planning<br>EMG 5.3 Company Emergency Operations Center | Guidelines on requirements of action plans to be developed at time of emergency |
| | 5.4.5 Resource Mobilization | EWG 10.0 Resource Management | Guidelines on communications. No references to personnel, equipment and information required to effectively respond to an emergency. |
| | 5.4.6 Notification and Reporting | EMG 8.0 Notification Procedures<br>EMG 14.5 Mandatory Reporting Requirements for Hazardous Occurrences | Internal Notification – AUI Reporting Chain Card not provided for review<br>External Notification – no procedures detailing specific information on reporting |
| | 5.4.7 Damage Assessment | EMG 5.0 Emergency Management Organization | |
| | 5.4.8 Claims Management | EMG 14.6 Public Relations | |
| | 5.4.9 Public Communications | EMG 10.0 Resource Management<br>EMG 13.0 Media and Public Relations<br>EMP Appendix F AltaGas' Crisis Communication Matrix<br>Numerous references to " AltaGas Ltd. Crisis Communications Group" | No evidence of EMP Appendix F<br>No evidence of methods or procedures of Crisis Communications Group. |
| | 5.4.10 Critical Incident Stress Management | EMG 14.7 Employee Assistance Program | |
| | 5.4.11 End of Emergency | EMG 13.0 Media and Public Relations<br>EMG 14.6 Public Relations | To be determined by Senior Management |

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| 5.5 Review and Debriefing | EMG 15.0 Post Incident Investigations | Guidelines, no evidence of policies, methods or procedures |  |
| **6. Administration** |  |  |  |
| 6.1 Training | EMG 2.3 Ongoing Validation and Training<br>EMG 6.3 Operation<br>EMG 6.4 Training Program – Internal<br>EMG 6.5 Liaison (1st Responders) and Continuing Education Programs |  |  |
| 6.2 Equipment Inspection and Maintenance |  | No evidence of policy, method or procedure |  |
| 6.3 Exercises | EMG 6.6 Emergency Exercise Program | Guidelines, no evidence of policy, method or procedure |  |
| 6.4 Distribution | EMG 1.6 Guide Review/Update |  |  |
| 6.5 Updating |  |  |  |
| 6.6 Approval | EMG 1.4 |  |  |
| 6.7 Audit | EMG 1.7 | No evidence of policy, method or procedure |  |

**AltaGas Utilities Emergency Response Handbook - Table 3**
**AER Directive 071 - Emergency Preparedness and Response Requirements for the Petroleum Industry Review**

| AER Directive 071 | | AltaGas Utilities EMG Policies, Methods and Procedures | Comments |
|---|---|---|---|
| **1. Introduction** | | | N/A |
| **2. Corporate Level ERPs** | | | |
| 2.1 Corporate-level ERP Requirements The licensee must have a corporate-level ERP with preplanned procedures that will aid in effective response to an emergency. The licensee is expected to determine the level of detail required to address each item in a corporate-level ERP based on the hazards and potential consequences of the emergency scenarios that its operations pose to the public and/or environment and to keep the plans current. Corporate-level ERP's do not require AER approval; however, the AER may request that they be submitted for review. | | EMG 3.0 Hazard – Specific Roles and Procedures | |
| 2.1 Corporate-level ERP Requirements As a minimum, the licensee must include the following information in its ERP: | | | |
| 2 | key licensee contacts | EMP 5.0 Contact Lists – General EMG 5.3 Activation | EMP references "Emergency Reporting Chain Card" documentation not provided or verified |
| | a 24 hour licensee emergency contact telephone number | EMP 1.2 AltaGas Crisis Communication Line EMG 1.2 AltaGas Crisis Communication Line | |
| | a method of classifying incidents and response actions for specific incidents | EMP 1.2 Levels of Incident EMP 1.3 Determining the Level of Incident and Initiating Response EMG 1.2 Levels of Incident EMG 1.3 Determining the Level of Incident and Initiating Response | |
| | a communications plan that addresses - communication with response team - communication with the public and media, and - downgrading and stand-down of emergency levels, | EMP 1.2 Levels of Incident EMP Appendix "F" Alta Gas's Crisis Communication Matrix EMG 5.8 Communications and Information Technology | EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified |
| | responsibilities of personnel required to respond to an emergency | EMG 3.0 Hazard – Specific Roles and Procedures | |
| | establishment of incident management systems, and | | |
| | activation of a reception centre | | No evidence of policy, method or procedure |
| 3 | The license must ensure that a call to its 24 hour emergency telephone number initiates immediate action. | EMP 1.2 AltaGas Crisis Communication Line EMG 1.2 AltaGas Crisis Communication Line EMP 2.2 Notification Mechanisms | |
| 4 | The licensee must ensure that its 24 hour emergency telephone number is posted by way of a conspicuous sign erected at the primary entrance to all licensee wells and facilities. | | No evidence of policy, method or procedure |

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|---|---|---|---|
| 2.1.1 Assessment Matrix for Classifying Incidents<br>The AER has developed an assessment matrix so that incidents can be classified and communicated to others by industry, local authorities, RHA's, and government agencies in a consistent manner throughout the province. | | ERP 1.2 Levels of Incident<br>EMP 3.0 Hazard "AUI follows the Risk Matrix found in the Alberta Energy Regulator document, Directive 071 - 'Appendix 4 - Assessment Matrix for Classifying Incidents' (located in Appendix "G").<br>EMP 1.2 Levels of Incident | EMP references "Directive 71 Assessment Matrix" documentation not provided or verified. EMP and EMP also reference Table 1 "Determining Level of Incident or Emergency" Table 1 and AER Directive 71 Assessment Matrix are not aligned. |
| 5 | The licensee must include all the information in Appendix 4 in its corporate-level ERP. | | |
| 6 | The licensee must define appropriate actions, including public protection measures that would be taken for each level of emergency. | | No evidence of policy, method or procedure |
| 2.1.2 Communications Planning<br>The development and implementation of an effective communications plan is essential to emergency response. In its corporate-level ERP, the licensee must | | EMP 1.2 Levels of Incident<br>EMP Appendix "F" AltaGas' Crisis Communication Matrix<br>EMG 5.8 Communications and Information Technology | EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified |
| 7 | describe its procedures for contacting and maintaining communication with key licensee personnel, government agencies, support services, members of the public, and the media; | | |
| | clearly define the responsibility to contact the AER and other  and other responders in the event of an emergency; the AER recommends that a communications flow chart be included in the ERP, identifying responsibilities by role; | | |
| | describe procedures that will be implemented during an incident to contact and maintain communication with directly impacted members of the public in order to keep them informed of the situation and the actions being taken; this includes plans for communicating the implementation of public protection measures, such as evaluation and sheltering in place for residents; | | |
| | describe procedures that will be used to inform and update the media and procedures in getting factual messages out to the public at large in an expeditious manner; and | | |
| | describe procedures to downgrade and stand--down levels of emergency. | | |
| 2.1.3 Responsibilities of Personnel<br>The licensee must identify the roles and responsibilities of personnel required to effectively respond to an emergency. One or more functions can be assigned to an individual depending on the complexity of the potential response to an emergency. | | EMP 3.0 Hazard – Specific Roles and Procedures | |
| 2.1.4 Incident Management Systems<br>In its corporate-level ERP, the licensee must | | EMP 2.0 Emergency Management Organization | |
| 9 | describe how it will manage and coordinate a response to an emergency, and | | |
| | address the roles and responsibilities of personnel at its on-site command post, the company regional emergency operations centre (REOC), and the corporate EOC. | | |

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|---|---|---|---|
| 2.1.5 Reception Centre<br>In its corporate-level ERP, the licensee must set out the procedures for | | | No evidence of policy, method or procedure |
| 10 | activating a reception centre located at a safe distance from the release source, and | | |
| | meeting and registering evacuees at the reception centre. | | |
| **3. Emergency Planning and Response Zones** | | | N/A |
| **4. Public and Local Authority Involvement in Emergency Preparedness and Response** | | | N/A |
| **5. Common Requirements for ERPs** | | | |
| 5.1 Assessment Matrix for Classifying Incidents<br>All incidents are classified as an alert or as a level-1, 2 or 3 emergency. Incidents that can be handled on site through normal operating procedures are very low risk and are typically defined as an alert. Those with low to high risk require a more difficult or complex resolution and are defined as emergencies. | | ERP 1.2 Levels of Incident<br>EMP 3.0 Hazard "AUI follows the Risk Matrix found in the Alberta Energy Regulator document, Directive 071 - 'Appendix 4 - Assessment Matrix for Classifying Incidents' (located in Appendix "G").<br>EMP 1.2 Levels of Incident | EMP references "Directive 71 Assessment Matrix" documentation not provided or verified. EMP and EMP also reference Table 1 "Determining Level of Incident or Emergency" Table 1 and AER Directive 71 Assessment Matrix are not aligned. |
| 1 | The licensee must include all the information in Appendix 4 in its ERP. | | |
| 2 | The licensee must define appropriate actions, including public protection measures that would be taken for each level of emergency. | | |
| 5.2 Public Protection Measures<br>The licensee must ensure that maps included in the ERP are sized to provide a clear representation of the entire mapped area and clearly identify | | EPZ not required Non Sour Non HVP | |
| 12 | trapping area, grazing lease, and range allotment boundaries and their reference numbers; | | |
| | other industrial operations, including oil and gas operations; | | |
| | railways and airports; | | |
| | corporate boundaries (e.g., hamlets, villages, towns); | | |
| | municipal and RHA boundaries; | | |
| | a legend, scale, and north directional indicator; and | | |
| 5.4 Equipment List<br>The licensee must ensure that the ERP includes a list (including location, number, and type) of the following: | | | No evidence of policy, method or procedure |
| 13 | communications equipment for the public safety coordinator, rovers, roadblock and air monitoring personnel, and any others that require it (the licensee is responsible for ensuring that communications equipment is made available to key response personnel); | | |
| | equipment for roadblock kits (including contents); | | |
| | ignition equipment that is maintained on site; and | | |
| | gas monitoring equipment. | | |
| 5.5 Mutual Aid Understandings<br>Mutual aid understandings should define each participant's commitment to provide aid and support during an incident and may also include other responsibilities agreed to during | | References to "mutual aid", "mutual aid plan" and "mutual aid agreements" throughout EMG and EMP | No evidence of policy, method or procedure |

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| | planning. The licensee is encouraged to provide details of mutual aid understandings in the ERP. | | |
| 5.6 Telephone Lists<br>The licensee must include in its ERP | | EMP 1.2 Levels of Incident<br>EMP Appendix "F" AltaGas' Crisis Communication Matrix<br>EMG 5.8 Communications and Information Technology<br>EMG 5.4 Regional Emergency Operations Centre | EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified |
| 14 | a telephone list of key internal personnel designated to assist in emergency response; and | | EMP references "Emergency Reporting Chain Card" documentation not provided or verified<br><br>EMG 5.4 Regional "call lists" not provided for review |
| | a telephone list of external emergency support services that may be required in an emergency, including, but not limited to, government departments and agencies, communication services, air monitoring services, emergency services, and oil spill cooperatives. | EMP 6.0 Regional Emergency Resources | Guidelines for requirements, specific information including phone numbers not provided. |
| 5.7 Plan Distribution | | ERP Distribution List | |
| 17 | The licensee must ensure that all required plan holders have a copy of the approved ERP. | | |
| | The licensee must ensure that a plan distribution list is included in the ERP. | | |
| 5.8 Communications Planning<br>The development and implementation of an effective communications plan is essential to emergency response. The licensee must | | EMP 1.2 Levels of Incident<br>EMP Appendix "F" AltaGas' Crisis Communication Matrix<br>EMG 5.8 Communications and Information Technology<br>EMG 5.4 Regional Emergency Operations Centre | EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified<br><br>EMP references "Emergency Reporting Chain Card" documentation not provided or verified |
| 19 | describe its procedures in the ERP for contacting and maintaining communication with key licensee personnel, government agencies, support services, and the media; | | EMG 5.4 Regional "call lists" not provided for review |
| | clearly define the responsibility to contact the AER and other responders identified in the plan in the event of an emergency; the AER recommends that a communications flowchart be included in the ERP, identifying responsibilities by role; | | |
| | ensure that the ERP clearly describes procedures that will be implemented during an incident to contact and maintain communication with directly impacted members of the public in order to keep them informed of the situation and actions being taken; this includes plans for communicating implementation of public protection measures, such as evacuation and sheltering in place for occupants within and beyond the EPZ, if applicable; and | | |
| | describe procedures that will be used to inform and update the media and procedures in getting factual messages out to the public at large in an expeditious manner; the messages should be coordinated among all parties. | | |

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| 20 | If there are separate ERPs for a gathering system that is tied into the sour operations facility, HVP pipeline, or cavern storage facility, then all the licensees must ensure that their ERPs have a bridging paragraph outlining what emergency communication will take place between the parties in the event of an emergency. The sour operations, HVP pipeline, or cavern storage facility ERP bridging paragraph refers to the other ERPs and vice versa. | | No evidence of policy, method or procedure |
| 5.9 Responsibilities of Personnel | In its ERP, the licensee must | | |
| 21 | identify roles and responsibilities of personnel required to effectively respond to the emergency, and | EMP 3.0 Hazard – Specific Roles and Procedures | Positions identified Names and Contact not provided |
| | provide the names of key personnel and responders. | | |
| One or more functions can be assigned to an individual depending on the complexity of the potential response to an emergency. As a minimum, the licensee is expected to assign the following responsibilities to personnel. If applicable: | | | |
| 21 | field incident command | | |
| | public safety coordination including evacuation and sheltering | | |
| | roadblocks and rovers | | |
| | air quality monitoring | | |
| | ignition, and | | |
| | communication with the responders, media and public. | EMP 1.2 Levels of Incident<br>EMP Appendix "F" AltaGas' Crisis Communication Matrix<br>EMG 5.8 Communications and Information Technology<br>EMG 5.4 Regional Emergency Operations Centre | EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified<br><br>EMP references "Emergency Reporting Chain Card" documentation not provided or verified<br><br>EMG 5.4 Regional "call lists" not provided for review |
| 5.10 Incident Management Systems | In its ERP, the licensee must | EMP 2.0 Emergency Management Organization | |
| 22 | describe how it will manage and coordinate a response to an emergency, and | | |
| | address the roles and responsibilities of personnel at its on-site command post, company REOC, and corporate EOC. | | |
| 5.11 Record Keeping<br>As part of its notification and consultation programs, the licensee must have a process for recording the following: | | EMG 1.8 Document and Records Management<br>EMG 11.0 Documentation<br>EMG Appendices<br>EMP 4.0 Checklists and Function Aids | Note: EMP Appendix "E" Forms not complete. EMG 1.8 Document and Records Management Procedure referenced but not provided for review.<br><br>EMG 1.8 Procedures or documentation of activation details, resource mobilization, |
| 23 | local authority and other government discussions, | | |
| | type of notification provided to the residents in an urban centre, | | |
| | attempts made to contact an individual if the licensee was unable to make contact, and | | |

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| | consultation with the public, including unsuccessful attempts to contact or obtain the cooperation of any required persons and any outstanding issues yet to be resolved. | | notification/reporting and debriefing records not provided for review. |
| 5.12 Reception Centre | | | No evidence of policy, method or procedure |
| 24 | The licensee must include procedures in the ERP for establishing, activating, staffing, and meeting and registering evacuees at the reception centre | | |
| 5.13 Downgrading and Stand-down of Emergency Levels | | | No evidence of policy, method or procedure |
| 25 | The licensee must include procedures in the ERP to downgrade and stand-down levels of emergency. | | |
| **6. Sour Well Site-specific Drilling and/or Completion ERP's** | | | N/A |
| **7. Sour Operations ERPs** | | | N/A |
| **8. ERPs for HVP Pipelines** | | | N/A |
| **9. ERPs for Cavern Storage Facilities Storing HVP Product** | | | N/A |
| **10. Spill Cooperative Response Plans** | | | |
| 10.1 Requirements<br>A licensee is exempt from the requirement to develop its own spill response plan, purchase spill cleanup equipment, and conduct an annual exercise if it is an active member in good standing of an oil spill cooperative.<br>Spill preparedness requirements apply to<br>   • all wells<br>   • facilities, and<br>   • pipelines transporting liquids and licenced to the AER | | EMP 3.3 Chemical Hazard<br>EMP 3.7 Environmental Incident<br>EMP 6.14 Spill Response Equipment<br>EMP Appendix B Environmental Regulatory Requirements<br>EMP Appendix C Spill Reporting Regulation<br>EMG 6.7 Mutual Aid<br>*"AUI is not part of a formal Spill Cooperative Program. AUI transports and distributes only sweet, natural gas through its pipelines, and transports only small volumes of contained liquids in its vehicles. AUI has retained Quantum Murray Emergency Response to provide 24-hour response to any liquid or environmental emergency beyond the scope of AUI's capabilities."* | Quantum Murray Emergency Response Spill Program not reviewed. |
| 10.2 Member of an Oil Spill Cooperative | | | |
| 10.2.1 Spill Cooperative Response Plan Contents | | | |
| The spill response plan addresses a release of any liquid product onto land or water from any well, pipeline, or facility described above. The plan, which may consist of several different manuals, contains the following: | | | |
| | a description of initial emergency response procedures and actions, as well as information on all contacts and services; | | |
| | an inventory of wells, pipelines carrying liquids, and associated facilities; | | |
| | topographical maps showing designated spill control points (if applicable), access roads, urban centres, bodies of water (i.e. streams, rivers, lakes) and water supply intakes for municipal and industrial operations, pipelines, wells, and facilities within the operating area; | | |
| | roles, responsibilities, and resources to manage the response ( the on-scene commander role can be filled with a designated licensee employee or a third party with appropriate expertise); | | |
| | policies for worker safety at emergency spill management sites; | | |
| | inventory and location of response equipment; | | |

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| | containment and recovery procedures applicable to the type, volume, and nature of the production and time of year; and | | |
| | annual training and exercise programs, a record of the training and exercises, and recommendations for continuous improvement. | | |
| 10.3 Member of an Oil Spill Cooperative<br>10.3.1 Spill Cooperative Response Plan Contents<br>The licensee must have an AER approved plan in place to address a release of any liquid product onto land or water from any well, pipeline, or facility described in Section 10.1. The plan is expected to address the following components: | | EMG 6.7 Mutual Aid<br>*"AUI is not part of a formal Spill Cooperative Program. AUI transports and distributes only sweet, natural gas through its pipelines, and transports only small volumes of contained liquids in its vehicles. AUI has retained Quantum Murray Emergency Response to provide 24-hour response to any liquid or environmental emergency beyond the scope of AUI's capabilities."* | <span style="color:red">Quantum Murray Emergency Response Spill Program not reviewed.</span> |
| 1 | a description of initial emergency response procedures and actions, as well as information on all contacts and services; | | |
| | an inventory of wells, pipelines carrying liquids, and associated facilities; | | |
| | topographical maps showing designated spill control points (if applicable), access roads, urban centres, bodies of water (i.e. streams, rivers, lakes) and water supply intakes for municipal and industrial operations, pipelines, wells, and facilities within the operating area; | | |
| | roles, responsibilities, and resources to manage the response ( the on-scene commander role can be filled with a designated licensee employee or a third party with appropriate expertise); | | |
| | policies for worker safety at emergency spill management sites; | | |
| | inventory and location of response equipment; | | |
| | containment and recovery procedures applicable to the type, volume, and nature of the production and time of year; and | | |
| | annual training and exercise programs, a record of the training and exercises, and recommendations for continuous improvement. | | |
| 10.3.2 Spill Response Equipment Requirements<br>A licensee that is not a member of an oil spill cooperative must | | | <span style="color:red">No evidence of policy, method or procedure</span> |
| 2 | purchase appropriate spill cleanup equipment, considering the type of operations and terrain in which the licensee operates, | | |
| | maintain the equipment in good working order, and | | |
| | store the equipment in the general area where it may be required and ensure immediate access to it. | | |
| **11. Corporate-level ERPs** | | | |
| 11.1 Requirements | | ERP Distribution List | |
| 1 | If an ERP is not required, the licensee must have an up-to-date copy of the corporate-level ERP (hard copy or electronic) available at a response location(s) in its area of operations. | | |

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| 2 | The licensee must review the corporate-level ERP with personnel assigned roles and responsibilities to ensure that it can be properly implemented. | EMG 2.2 Ongoing Validation and Training<br>EMG 6.0 Preparedness | |
| 11.1.1 Assessment Matrix for Classifying Incidents | | | |
| 3 | The licensee must use the Assessment Matrix for Classifying Incidents (Appendix 4) to classify an incident. | ERP 1.2 Levels of Incident<br>EMP 3.0 Hazard "AUI follows the Risk Matrix found in the Alberta Energy Regulator document, Directive 071 - 'Appendix 4 - Assessment Matrix for Classifying Incidents' (located in Appendix "G").<br>EMP 1.2 Levels of Incident | <span style="color:red">EMP references "Directive 71 Assessment Matrix" documentation not provided or verified. EMP and EMP also reference Table 1 "Determining Level of Incident or Emergency" Table 1 and AER Directive 71 Assessment Matrix are not aligned.</span> |
| 4 | The licensee must contact the AER immediately after it has communicated and activated internal response resources to confirm the level of emergency and convey the specifics of the incident. | EMG 7.2 Termination<br>*In the event the EMP is activated, and eventually terminated ('stand-down'), AUI will notify as soon as possible, the Alberta Energy Regulator (AER), providing details as required by AER, and as per AUI's communication process with regulators.* | <span style="color:red">AUI's communication process with regulators not reviewed</span> |
| 11.1.2 Communications Planning | | | |
| 5 | After contacting the AER, the licensee must notify the local authority, the RCMP/police, the local RHA, other applicable government agencies,12 and support services required to assist with initial response if the hazardous release goes off site and has the potential to impact the public or if the licensee has contacted members of the public or the media. | EMP 1.2 Levels of Incident<br>EMP Appendix "F" AltaGas' Crisis Communication Matrix<br>EMG 5.8 Communications and Information Technology<br>EMG 5.4 Regional Emergency Operations Centre | <span style="color:red">EMP reference "AltaGas' Crisis Communication Matrix" documentation not provided or verified<br><br>EMP references "Emergency Reporting Chain Card" documentation not provided or verified<br><br>EMG 5.4 Regional "call lists" not provided for review</span> |
| 6 | The licensee must make the information in Appendix 8 available to the public as soon as possible during an emergency. | | <span style="color:red">No evidence of policy, method or procedure</span> |
| 11.1.2.1 Downgrading and Stand-down of Emergency Levels | | | |
| 7 | Once the situation improves, the licensee must make the decision to downgrade or stand- down an emergency in consultation with the AER. The AER will consult with other applicable agencies and confirm with the licensee that the emergency downgrade or stand-down is appropriate. | EMG 7.2 Termination<br>*In the event the EMP is activated, and eventually terminated ('stand-down'), AUI will notify as soon as possible, the Alberta Energy Regulator (AER), providing details as required by AER, and as per AUI's communication process with regulators.* | <span style="color:red">AUI's communication process with regulators not reviewed</span> |
| 8 | The licensee must keep all notified and evacuated persons and the media informed of the status of an emergency. | | |
| **12 Emergency Planning Zone** | | N/A | |
| **13 Public and Local Authority Involvement in Emergency Preparedness and Response** | | N/A | |
| **14 Common Requirements for ERPs** | | | |
| 14.1 ERP Location | | ERP Distribution List | |
| 1 | The licensee must have an up-to-date copy of the ERP (hard copy or electronic) at a response location(s) in its area of operations. | | |
| 14.2 Assessment Matrix for Classifying Incidents | | ERP 1.2 Levels of Incident | <span style="color:red">EMP references "Directive 71 Assessment Matrix" documentation not provided or verified.</span> |
| 2 | The licensee must use the Assessment Matrix for Classifying Incidents (Appendix 4) to classify an incident. | EMP 3.0 Hazard "AUI follows the Risk Matrix found in the Alberta Energy Regulator document, Directive 071 - 'Appendix 4 - Assessment Matrix for Classifying Incidents' (located in Appendix "G").<br>EMP 1.2 Levels of Incident | <span style="color:red">EMP and EMG also reference Table 1 "Determining Level of Incident or Emergency" Table 1 and AER Directive 71 Assessment Matrix are not aligned.</span> |

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| 3 | The licensee must take appropriate actions, including public protection measures, for each level of emergency. | ERP 1.2 Levels of Incident | | |
| 4 | The licensee must contact the AER immediately after it has communicated and activated internal response resources to confirm the level of emergency and convey the specifics of the incident. | EMG 7.2 Termination<br>*In the event the EMP is activated, and eventually terminated ('stand-down'), AUI will notify as soon as possible, the Alberta Energy Regulator (AER), providing details as required by AER, and as per AUI's communication process with regulators.* | AUI's communication process with regulators not reviewed | |
| 14.3 Public Protection Measures | | | N/A | |
| 14.4 Equipment Location and Calibration | | 6.0 Regional Emergency Resources | General guides for sourcing resources | |
| 16 | The licensee must ensure that equipment identified in the ERP is available and located where specified in the ERP for any operation. | | | |
| 17 | The licensee must ensure that company equipment is operational and the appropriate documentation is available to verify testing and calibration requirements. | | | |
| 14.5 Communications Planning | | EMG 7.2 Termination<br>*In the event the EMP is activated, and eventually terminated ('stand-down'), AUI will notify as soon as possible, the Alberta Energy Regulator (AER), providing details as required by AER, and as per AUI's communication process with regulators.* | AUI's communication process with regulators not reviewed | |
| 18 | After contacting the AER, the licensee must notify the local authority, RCMP/police, the local RHA, government agencies, and support services required to assist with initial response if the hazardous release goes off site and has the potential to impact the public or if the licensee has contacted members of the public or the media. | | | |
| 19 | The licensee must make the information listed in Appendix 8 available to the public as soon as possible during an emergency. | | No evidence of policy, method or procedure | |
| 14.5.1 Downgrading and Stand-down of Emergency Levels | | EMG 7.2 Termination<br>*In the event the EMP is activated, and eventually terminated ('stand-down'), AUI will notify as soon as possible, the Alberta Energy Regulator (AER), providing details as required by AER, and as per AUI's communication process with regulators.* | AUI's communication process with regulators not reviewed | |
| 20 | Once the situation improves, the licensee must make the decision to downgrade or stand- down an emergency in consultation with the AER. The AER will consult with other agencies as applicable and confirm with the licensee that the emergency downgrade or stand-down is appropriate. | | | |
| 21 | The licensee must keep all affected persons and the media informed of the status of an emergency. | | | |
| 14.6 Plan Management Process<br>The licensee must demonstrate that its plan management process keeps ERPs up to date. A plan management process ensures that | | EMG 1.7 Plan Review Update<br>*The Emergency Planning Committee (EPC) will review the Emergency Management Plan annually.*<br>EMG 1.7 Guide Review/Update | Directive 71 requires semi-annual review | |

| 22 | plans are reviewed and updated on a semi-annual basis, if necessary, with changes made to ensure that the information remains accurate; updates could be triggered by some or all of the following:<br>• changes to current emergency information,<br>• new mapping information—a small map of the   affected area showing the changes would be acceptable for a period of one year,<br>• new resident information,<br>• any changes to response staff information or response capabilities, and<br>• facility additions such as well or pipeline tie-ins that do not require submission of a supplement; | | |
| | residents are contacted to update their information; and | | |
| | ground truthing identifies any changes, such as new residents, businesses, and renters, and verifies the ERP maps—the licensee may use any method for ground truthing. | | |
| | **14.8 Reception Centre**<br>When evacuation of residents is required, the licensee must | | No evidence of policy, method or procedure |
| 26 | activate a reception centre located at a safe distance from the release source, and | | |
| | meet and register evacuees at the reception centre. | | |
| | **14.9 Training Sessions**<br>The licensee must provide training sessions to ensure that response personnel are competent in emergency response procedures. | EMP 6.12 Human Resources<br>EMG 2.3 Ongoing Validation and Training<br>EMG 6.1 Overview<br>EMG 6.2 Function | No evidence of annual tabletop or major exercises every three years.<br>No evidence of notification to AER |
| 27 | The licensee is expected to provide ERP training on<br>• the overall plan<br>• roles and responsibilities during an incident<br>• public protection measures used during an emergency, and<br>• available communication methods. | EMG 6.3 Operation<br>EMG 6.4 Training Program – Internal<br>EMG 6.5 Liaison and Continuing Education Programs<br>EMG 6.6 Emergency Exercise Program | |
| | **14.10 Exercise Requirements** | | |
| 28 | The licensee must test its ERPs through the following types of planned exercises to promote emergency response preparedness:<br>• tabletop or communications exercise, held annually for each area ERP, except in a year when a major exercise is held, and<br>• major exercise, held once every three years for each area ERP. | | |
| 29 | The licensee must<br>• notify the appropriate AER Field Centre 30 days in advance of a scheduled exercise via the AER DDS system, and<br>• invite the local authority, the RHA, or any other government department or agency to | | |

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|  | participate and/or observe at major exercises. |  |  |
| | 14.11 Record Keeping<br>The licensee must have a process for recording the following activities: | | |
| 30 | Incident Records<br>formation gathered during and following an incident: these records provide documentation to be used for assessment, historical, and analytical purposes (see Appendix 9: First Call Communication Form, which may be used during an incident) | | No evidence of policy, method or procedure |
| | Keeping ERPs Current<br>efforts to keep the ERP current, including attempts to contact or obtain the cooperation of any required persons and any outstanding issues yet to be resolved | EMG 6.0 Preparedness<br>EMG 6.2 Function<br>EMG 6.3 Operation | |
| | Training, Meetings, and Exercise Records<br>records of staff training<br>within 60 days of an exercise, a report of exercise results to be maintained for assessment purposes that includes<br>  type of exercise held<br>  scope and objectives<br>  persons involved<br>  outcome (i.e., whether objectives were achieved)<br>  lessons learned<br>  action plan, including timelines<br>documentation of all presour and/or critical sour meetings, such as meeting sign-in sheets, invitations, and minutes for possible review under the ERCB ER Assessment Program<br>The licensee is expected to retain all records for a period of three years. | | No evidence of policy, method or procedure |
| **15. Sour Well Site-specific Drilling and/or Completion ERPs** | | | N/A |
| **16. Member of an Oil Spill Cooperative** | | | |
| 16.1.1 Spill Training Exercises and Notification Requirements<br>within 60 days of an exercise, a report of exercise results to be maintained for assessment purposes that includes | | EMP 3.3 Chemical Hazard<br>EMP 3.7 Environmental Incident<br>EMP 6.14 Spill Response Equipment<br>EMP Appendix B Environmental Regulatory Requirements<br>EMP Appendix C Spill Reporting Regulation<br>EMG 6.7 Mutual Aid | Quantum Murray Emergency Response Spill Program not reviewed. |
| 1 | As part of its spill response training, a licensee that is a member of a spill cooperative must<br>  • attend and be appropriately represented at a minimum of one cooperative annual exercise in the area where its operations are located; attendance at an exercise held outside of the area in which the licensee operates facilities is considered satisfactory, provided that the administrator of each spill cooperative involved is notified in advance for tracking purposes; or<br>  • have an area representative complete a spill response course, self-study spill responder course, or on-scene spill commander course from a recognized training institution in lieu | "AUI is not part of a formal Spill Cooperative Program. AUI transports and distributes only sweet, natural gas through its pipelines, and transports only small volumes of contained liquids in its vehicles. AUI has retained Quantum Murray Emergency Response to provide 24-hour response to any liquid or environmental emergency beyond the scope of AUI's capabilities." | |

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| | of attendance at an oil spill cooperative exercise; this option cannot be used in consecutive years by the licensee; further, if the option of taking a course in lieu of exercise attendance has been used, the licensee needs to notify the local oil spill cooperative administrator in advance for tracking purposes. | | |
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| 16.1.2 Training Exercise Report Summaries | | | |
| 3 | The spill cooperative must complete the training exercise report summary within 30 days following the training exercise and make it available to the AER upon request for a period of two years following each training exercise. | | |
| 16.2 Non-member of an Oil Spill Cooperative | | | |
| 16.2.1 Spill Training Exercises and Notification Requirements | | | |
| 4 | A licensee that is not affiliated with a local spill cooperative must conduct its own exercise in the area where its operations are located. | | |
| 5 | The licensee must demonstrate the same competencies as an oil spill cooperative member. | | |
| 6 | The licensee must notify the appropriate AER Field Centre in writing at least 30 days in advance of the spill equipment deployment training exercise or tabletop exercise and include the following information:<br>• the type of training exercise, the date on which it will be conducted, and the legal description of the land on which it will be conducted;<br>• a map showing the general topography, location of and access routes to the deployment area, and the location of any municipal water intakes within 3 kilometres (km) of the deployment area;<br>• the proposed spill material and volume to be used, if any (any liquid spill medium used in the exercise has to be edible canola oil or mineral oil, dyed with an innocuous dye that harms neither water quality nor flora and fauna);<br>• comments on the public use of the area, the collection and disposal of garbage, and a statement indicating the extent, if any, of anticipated surface disturbance to stream banks or shorelines at the test site; and<br>• the name of the landowner on whose land the training exercise will be held, and confirmation that the landowner is agreeable | | |

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|  | to the exercise proceeding at the proposed test site. |  |  |
| 16.2.2 Training Exercise Report Summaries | | | |
| 7 | The licensee must complete the training exercise report summary within 30 days following the training exercise and make it available to the AER upon request for a period of two years following each training exercise. |  |  |