

Alberta Energy
Regulator (AER)
Third-Party Review
23RFP-CS016

Table of Contents

- 4 Project Overview
- 6 Observations and Opportunities for Improvement
- 19 Appendix

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The procedures performed comprise an advisory engagement, which is not subject to Canadian Auditing Standards or Canadian Standards on Review or Assurance engagements. Consequently, no opinion or conclusion intended to convey assurance are expressed. Had additional procedures been performed, other matters may have come to our attention that would have been reported.



Project Overview

This Supplemental Report details the Observations and Opportunities for Improvement for the third-party review performed. This Supplemental Report must be read in conjunction with the Third-Party Review Report dated September 11, 2023.

Background, Objective and Scope

Background

An Environmental Protection Order (EPO) was issued February 6, 2023, by the Alberta Energy Regulator (AER) to Imperial Oil Limited (Imperial) in response to two containment incidents at the Kearl Oil Sands Project (Kearl). Kearl is an Imperial owned and operated oil sands site in the Athabasca Oil Sands Region of Alberta, 45 kilometres northeast of Fort McKay.

The Audit and Finance Committee (AFC) of the Board of Directors (Board) of the AER engaged Deloitte as a third-party to assess (herein referred to as “Review”) the AER’s actions surrounding the Kearl seepage and spill.



Scope

The scope of the Review included:

- Risk Evaluation and Incident Communication
- Incident and Emergency Response
- Incident Notification
- Incident Investigation Protocol
- Investigation Communication (internal and external) Protocols
- Compliance and Enforcement Processes
- Board Reporting and Communications
- Review of relevant policies and procedures



Objective

The objective of the Review was to review and provide recommendations on the AER’s policies, standards, procedures and communication processes for emergency response, incident reporting, investigation and action specifically during the period of the Kearl incidents between May 19, 2022, and issuance of the EPO.



Out of Scope

The scope of the review did not include:

- Development of process maps
- Interviewing Imperial employees and directors
- Identifying and/or reviewing gaps in Imperial’s response
- Public communication support, including responding to public inquiries
- Forensic analysis of the response to the Kearl seepage and spill



Deloitte commenced work on the Review on May 16, 2023. The remainder of this report provides the results of the Review.

Approach and Methodology

Approach



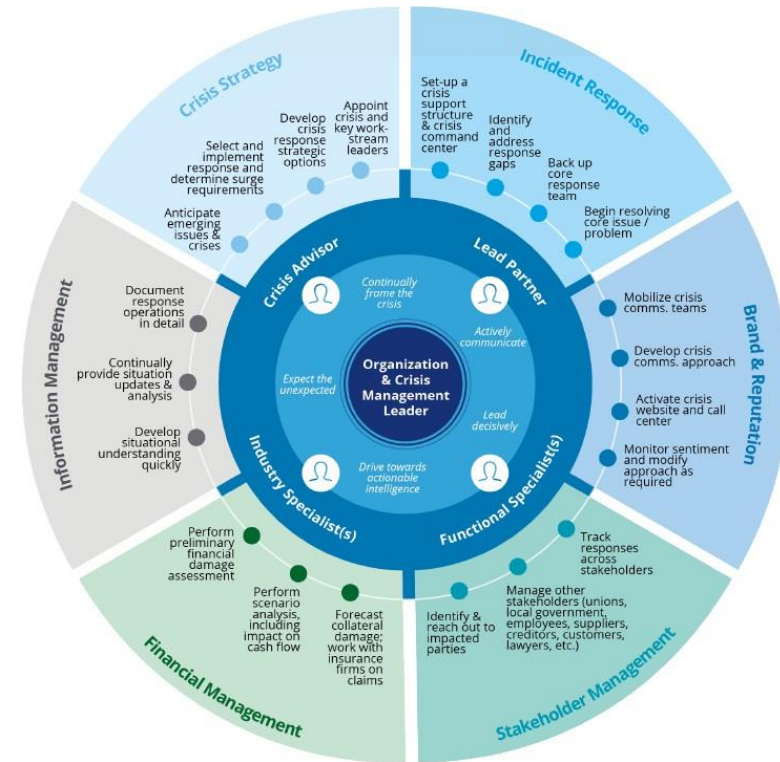
The following activities were performed as part of Deloitte's approach to the Review:

- Confirmed the objective, scope requirements, priorities, and timing with the AFC.
- Leveraging our Internal Audit approach, developed a workplan based on Deloitte's Global Framework for Crisis and Incident Response (the "C&IR Framework").
- Performed internal interviews with AER personnel to understand the AER's policies, standards, procedures and the actions taken in relation to the Kearsley Lake seepage and spill.
- Performed interviews arranged by the AER, with external stakeholders, including, Indigenous Peoples and the Regional Municipality of Wood Buffalo (RMWB).
- Reviewed the relevant AER policies, standards and procedures based on the results of information gathered in interviews and compared against the C&IR Framework.
- Reported opportunities for improvement.

Methodology



Our workplan leveraged Deloitte's Global Framework for C&IR, which is based upon leading practice principles and includes the following:



Observations and Opportunities for Improvement By Scope Area & Principles for Incident Response¹

¹ Based on Deloitte's Global Framework for Crisis and Incident Response

**Guiding Principles for Incident Response:****1. Preparation and Activation of Incident Response; 5. Informative Reporting****Review Criteria**

The AER's policies, standards, procedures, and/or processes outline how the AER evaluates and communicates risks. Risks are evaluated and communicated by the AER in compliance with expected policies, standards, procedures, and/or processes.

The expected practices are outlined in the Manual and Incident Response Handbook, along with the Emergency Management Program Manual, for risk evaluation and assessment purposes. In responding to an industry incident or emergency, the AER formally receives reports through the Environment and Dangerous Goods Emergency EDGE system, which is shared with other Government of Alberta (GoA) response groups. The EDGE system answers phones, and occasionally, the AER is informed of incidents by the duty holder. When an incident or emergency is reported to the EDGE system, it serves as the initial point of contact. The EDGE system gathers relevant information and employs a triage process to evaluate the severity of the reported incident, categorizing it as an emergency, an incident, a complaint, or a normal notification. This information is shared with the AER through an EDGE call sheet¹, which is used by the AER team to review the initial assessment made by the EDGE system, take over the evaluation of the matter, lead the response, and contact the appropriate stakeholders.

**Background**

On May 19, 2022, it was reported to the AER directly by Imperial and through the EDGE system that discoloured water was being observed around the Kearl lease boundary. On May 20, 2022, an AER inspector visited the Imperial site and observed the seep areas. The incident response and investigation took place from May 20, 2022, and is ongoing to the date of this report in support of the EPO issued, including ongoing consultations with the AER Subject Matter Experts (SMEs) throughout. On September 2, 2022, a Notice of Non-Compliance was issued to Imperial under EPEA Approval 46586-01-00, Sections 4.2.1 and 4.2.3. Through our interviews with the AER, it was stated that due to the need to gather a robust understanding of the incident and to protect the integrity of the incident response process, from the initial notification of the incident to the Notice of Non-Compliance, that there was no communication or engagement with Indigenous Peoples, RMWB, or other external stakeholders.

During our interviews with the Indigenous Peoples and the RMWB, feedback was provided that these groups were not informed about the incidents at Kearl until after the issuance of the EPO which was on February 6, 2023. Moreover, all respondents expressed significant concern with the gap in communications around the event, especially in the context of one email to a single point of contact to the communities in May 2022 with no additional follow-up until the EPO was issued. For nine months a developing event with offsite impacts was being managed and no additional communications were formally provided to regional Indigenous and First Nations communities.

¹ EDGE Notification Reference Number: 0390737



Observations

Based on procedures performed for the Kearl incidents, our Review found that the AER followed its existing policies, standards, procedures, and/or processes. We did note the following opportunities for improvement when comparing to our C&IR Framework, and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:

- Insufficient details outlining the start-to-finish processes and procedures for how an incident or emergency should be handled including timeliness of the inspection.
- Lack of details in the communications plan on how the AER should inform, engage, and consult with Indigenous Peoples, municipalities, and other impacted stakeholder groups while there is an active incident response process (Refer to Observation 5, Investigation Communication, for additional details).
- AER did not use the available Incident Response Outreach (IRO) to provide information regarding the response to an incident in a timely manner to the affected Indigenous Peoples and stakeholders.
- Simultaneous and inconsistent use of the terms “incident” and “emergency” throughout policies, procedures and manuals.
- While informal practices exist, there are no documented procedures for internal communication and escalation to management or the Board.



Opportunities for Improvement

In consideration of the lessons learned by the AER resulting from the Kearl incidents, the AER should develop a plan consider the suggested practices in the C&IR Framework. In order to do this, the AER should consider the following:

- Create more detailed incident and emergency processes covering reporting, inspection, evaluation, communication, escalation, resolution, and post-incident review.
- Create detailed call-out protocol and procedures outlining who, when, and how to communicate internally and externally during emergencies. These plans should address various communication channels and timelines for updates.
- Adhere to the Incident Response Officer's (IRO) guidelines and provide the information to the different stakeholders on a timely basis.
- Standardize and clarify the terms "incident" and "emergency" across policies, procedures, and manuals.
- Establish formal documented procedures for internal communication and escalation to management and the Board for incidents and emergencies.

**Guiding Principles for Incident Response:****2. Roles/Decision Making Authorities; 6. Implementation/Operational Response****Review Criteria**

The AER's policies, standards, procedures, and/or processes outline:

- The AER's role when an incident is reported; and,
- Whether the AER is required to assess or verify the level of seriousness for each incident reported.

**Background**

The AER follows the guidelines outlined in the Incident Response Handbook, the Emergency Management Program Manual, and Compliance and Enforcement Program. These documents define an incident as “an unexpected occurrence or event requiring action by response personnel to prevent or minimize impacts on people, property, and the environment”¹, but do not define an emergency. When an incident or emergency is reported through the EDGE system, or directly from the duty holder, the documents note that the AER’s main role is “to ensure that the duty holders respond in efficient, effective, and appropriate manners to all incidents”. The AER uses Incident Response Handbook, which includes the Assessment Matrix for Classifying Incidents based on Directive 071², to assess the level of seriousness.

On May 19, 2022, discoloured water was reported around the Kearl lease boundary. As per the guidance in Incident Response Handbook, an AER inspector visited the Imperial site on May 20, 2022, and observed the seep areas.

¹ Source: “Incident Support System Procedure 006”

² Directive 071: This directive sets out the requirements for emergency preparedness and response for sites regulated under the Oil and Gas Conservation Act, Pipeline Act, Oil Sands Conservation Act, and Geothermal Resource Development Act.



Observations

Based on procedures performed, for the Kearl incidents, our Review found that the AER followed the existing policies, standards, procedures, and/or processes. There were no areas of non-adherence to stated policies and procedures. We did note the following opportunities for improvement when comparing to our C&IR Framework, and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:

- The AER's Emergency Management Program Manual does not:
 - Provide step by step guidance and timeliness of the steps to be followed during an emergency, including early notification of potentially impacted stakeholders;
 - Provide a definition of an emergency; and,
 - The types of testing to be performed once an emergency has been reported.
- The AER's Incident Response Handbook does not include the following:
 - Instructions to define when or how water samples should be taken by industry;
 - How the AER will provide oversight of the sampling and results;
 - When the AER would take samples directly; or,
 - A clear indication of whether groundwater is included in Section 3a (Impact to a Waterbody – Delineation and Sampling) under its definition of a waterbody within the Incident Response Handbook.
- There is a lack of guidance in Directive 071, which may result in inconsistent application of the directive in future incidents or emergencies.



Opportunities for Improvement

The AER should develop a plan to update the documentation to align with our C&IR framework and the expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, the AER should consider the following:

- Revise and update the AER's Emergency Management Program Manual for noted observation areas.
- Provide specific guidelines for inspectors and licensees regarding sample collection, methods, responsibilities, locations, frequency, and handling protocols.
- Incorporate and elaborate on the definition of "waterbody," explicitly indicating its coverage with regards to groundwater, either inclusion or exclusion, within the Incident Response Handbook.
- Specify if Directive 071* applies to Oil Sands mining, e.g., Kearl incidents.

**Guiding Principles for Incident Response:****4. Stakeholder management; 5. Informative Reporting****Review Criteria**

The AER's Call Handling Procedures outlines a notification process. The notification process based on the severity of the incident is followed and tracked as part of the triage setup in EDGE system for the Kearl incidents.

**Background**

The Alberta EDGE system is operated by the Ministry of Transportation and is responsible for being the point of contact for all energy, environmental, and industrial emergencies, incidents, and complaints reporting. Based on the classification and severity of incidents, the EDGE system will forward them to the relevant parties whether inspectors, major investigations team or to other Governmental bodies, such as Environment and Climate Change Canada (ECCC). The classification and severity of incidents are categorized, as defined by the AER Triage Table, into one of the following: Complaint (unknown impact), Incident (minor impact), Emergency (significant impact) or other routine notifications.

During our Review of Kearl incidents, the main events that occurred related to incident notification were as follows:

- The EDGE system was notified on May 19, 2022, and forwarded to the AER inspector on the same day.
- The call type was classified as "Incident".
- The severity assessed as minor impact.

**Observations**

Based on procedures performed, for the Kearl incidents, our Review found that the AER followed the existing policies, standards, procedures, and/or processes. There were no areas of non-adherence to stated policies and procedures. We did note the following opportunities for improvement when comparing to our C&IR Framework, and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:

- The existing criteria being used during the triage process by the EDGE system are subjective in nature on how an incident versus an emergency is defined.

**Opportunities for Improvement**

The AER develop a plan to update the documentation to align with our C&IR Framework, and the expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, the AER should consider the following:

- Define precise incident criteria for the AER Triage Table for EDGE.
- Review and update the AER Triage Table for lessons learned from this incident for the Alberta EDGE system operated by the Ministry of Transportation to use.
- Ensure timely notification of Indigenous Peoples and all relevant stakeholders, including those potentially affected, by incorporating them into the incident notification and triage process.

**Guiding Principles for Incident Response:****6. Implementation/Operational Response****Review Criteria**

The AER has a documented and approved incident response and investigation protocol, with tracking of the execution of the incident response and investigation protocol in place.

**Background**

As a response to reported incidents and emergencies, the AER Compliance and Enforcement personnel are deployed through Compliance Assurance Procedures to conduct verification activities, including inspections. These actions involve utilizing a range of compliance or enforcement tools, such as issuing Notices of Non-compliance, orders, administrative sanctions, or penalties.

In our Review of Kearl incidents, we obtained documentation to evidence that the inspectors visited the area within 24 hours of the reported incident on May 20, 2022, and followed the incident response protocols set forth by the AER. Throughout the initial inspection and the following testing of the seepage, its severity was classified as an “Incident”.

We have received feedback from both Indigenous Peoples and the RMWB about the incident response and inspection processes, expressing concerns over the lack of transparency from AER regarding ongoing incident response and inspections.

**Observations**

Based on procedures performed, for the Kearl incidents, our Review found that the AER followed the existing policies, standards, procedures, and/or processes. There were no areas of non-adherence to stated policies and procedures. We did note the following opportunities for improvement when comparing to our C&IR Framework and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:

- Procedures lack a defined timeline and detailed criteria for the re-evaluation of reported incidents and emergencies to validate their classification and severity.
- The procedures on engaging and communicating with Indigenous Peoples do not provide clear guidelines or expectations for the timeliness of communications.
- The procedures do not define a specific timeline for concluding the incident response process.
- Through the interviews, the AER has noted challenges balancing the integrity of incident response and investigation process and the level of transparency expected from Indigenous Peoples and other stakeholders.

**Opportunities for Improvement**

The AER develop a plan to update the documentation to align with our C&IR Framework, and the expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, the AER should consider the following:

- Develop a systematic method to re-evaluate incident categorization, including for seepage and spills.
- Create clear guidelines and timelines for engaging with Indigenous Peoples for more timely and relevant communication during incident response.
- Set clear timelines for incident response processes to ensure appropriate response time.
- Formulate explicit guidelines for sharing information with Indigenous Peoples, stakeholders, and the right holders during incident response process, considering their diversity.
- Specify if Directive 071 applies to Oil Sands mining, e.g., Kearl incidents.

5 Investigation Communication (Internal & External) Protocol



Guiding Principles for Incident Response:

3. Communications/Public Relations



Review Criteria

The AER has documented and approved internal and external incident communication protocols. The AER followed and tracked the execution of both the internal and external response.

The AER's Engagement and Communication (E&C) team is engaged in the incident and investigation process for internal and external communications during the drafting phase of an EPO as per the Order Procedure (May 2020), including understanding how and when to communicate with Indigenous Peoples and stakeholders, and issuing public media releases. During the Kearl incidents, the E&C team:

- Met with the Statutory Decision Maker (SDM) to understand incident response process details, expected issuance date, and stakeholders to notify, in addition to the Government of Alberta, municipalities and Indigenous Peoples.
- Identified stakeholders and Indigenous Peoples list to receive official email notifications.
- Posted a public media release to the AER website upon EPO issuance.



Background

During the drafting phase of the EPO, the SDM begins notifying management that an order is expected to be issued and details are shared. For the Kearl incidents:

- Communication to senior management began one week prior to EPO issuance, focused on the seepage incident and the incident response and actions taken for containment to date.
- The intent to issue an EPO and information to support this action was shared with executive management on February 1, 2023.
- The Board received a communication informing them of the EPO when it was issued on February 6, 2023.

During our Review of Kearl incidents, we obtained documentation demonstrating that an inspector visited the site to review the area and further understand the report from the EDGE system within 24 hours of the reported incident on May 20, 2022. The inspectors discussed the incident details with SMEs and continue to do so.

After the EPO was issued on February 6, 2023, communications were initiated with the Indigenous Peoples and the RMWB.

5 Investigation Communication (Internal & External) Protocol (cont'd)

Based on procedures performed, for the Kearl incidents, our Review found that the AER followed the existing policies, standards, procedures, and/or processes. We did note the following opportunities for improvement when comparing to our C&IR Framework, and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:



Observations

- The AER lacks structured processes and procedures for both internal and external communications. This extends to the absence of clearly outlined communication protocols to be followed in response to evaluated incidents and emergencies, whether during or post the incidents or emergencies.
- Absence of formal documentation on when, how and what to communicate to both external and internal parties including Indigenous Peoples, municipalities, and other affected parties.
- The AER does not have specific process to verify that stakeholders and Indigenous Peoples received the initial or subsequent communications.

The AER develop a plan to update the documentation to align with our C&IR Framework, and the expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, AER should consider the following:



Opportunities for Improvement

- Develop thorough communication protocols prioritizing efforts, identifying risks, and choosing channels based on severity.
- Create protocols for engaging Indigenous Peoples and external stakeholders (for example, municipalities, and/or the public), specifying types of incident response, incidents, investigations and emergencies which require communication, and the frequency, methods, content, and responsible parties for such.
- Assign roles for communicating with local communities and inhabitants in the affected areas.
- Verify stakeholders' receipt of initial and subsequent communications.

**Guiding Principles for Incident Response:****6. Implementation/Operational Response****Review Criteria**

The AER has documented and approved Compliance and Enforcement processes. The AER followed and tracked the execution of the Compliance and Enforcement processes.

The AERs Compliance & Liability Management program provides a framework to address violations or non-compliance issues by the duty holder. Within this framework, a SDM is delegated the ability to issue an order, which are used to require regulated parties to address non-compliance issues or take proactive measures. The role of an SDM is outlined in the Statutory Decision-Making guide, including background information, and recommended statutory decision-making approaches. This guide serves as a resource and pertinent information for making a wide range of statutory decisions under the AER's jurisdiction.

Specifically, an order can be issued in the following circumstances:

- Risk to public safety;
- When there is a release of a substance to the environment that may cause, has caused, or is causing an adverse effect to the environment; or,
- When an energy resource activity is operating in a noncompliant manner.

**Background**

With regards to the Kearl incidents, on September 2, 2022, a Notice of Non-Compliance was issued to Imperial under EPEA Approval 46586-01-00, Sections 4.2.1 and 4.2.3. Following this, the incident response process and follow-up with Imperial continued as the incident continued to evolve and further information was gathered. The EPO was issued to Imperial on February 6, 2023, in response to two containment incidents at Kearl (the second of which occurred on February 4, 2023), detailing the actions Imperial was required to take and the deadlines of these actions.



Observations

Based on procedures performed, for the Kearl incidents, our Review found that the AER followed the existing policies, standards, procedures, and/or processes. There were no areas of non-adherence to stated policies and procedures. We did note the following opportunities for improvement when comparing to our C&IR Framework, and in consideration of the expectations of the Indigenous Peoples and municipalities interviewed:

- Order Procedures¹:
 - The definition of "significant impacts" is subjective.
 - The timeline for the standard process for issuing an order is not specified, only mentioning that it takes 3+ days, with no maximum limit mentioned.
 - While created to give SDMs guidance for issuing orders, some sections are subjective, particularly in determining when and how to consider actual and perceived risk factors for issuing an order and selecting the appropriate order type.
 - There is limited risk criteria based on actual or potential risk factors provided to the SDMs.
- Statutory Decision-Making Guide was last updated in March 2016.








Opportunities for Improvement

The AER develop a plan to update the documentation to align with our C&IR Framework, and the expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, the AER should consider the following:

- Clearly define "significant impacts" in Expedited EPO process. Provide examples for guidance.
- Following the completion of evidence gathering, set time limits for the Standard EPO process.
- Develop objective criteria that the SDMs can use to assess and determine the specific actions to take based on actual and potential risk factors.
- Include "Perceived risk" factor in the decision-making process to address concerns related to public safety, the environment, or orderly development.

¹ Order Procedures: A document that defines the statutory decision makers process to follow to produce an order.

 Guiding Principles for Incident Response:	5. Informative Reporting
 Review Criteria	<p>The AER's policies, standards, procedures, and/or processes outline Board reporting requirements, including escalation criteria. Information provided to the Board was delivered in a timely manner.</p>
 Background	<p>In relation to the incidents at Kearl, the Board of AER was notified about the issuance of the EPO on February 6th, 2023. The communication was about the release which was reported on February 4th, 2023, by the duty holder. However, through this communication to the Board, there was no indication that there had been an ongoing event occurring since May 2022 and that there was a potentially EPO forthcoming of that incident.</p>
 Observations	<p>There is no comprehensive guide or manual detailing procedures for escalating and reporting the different incidents to the Board. This also includes a lack of defined timelines, and clear criteria of notifications, frequency and information expected to be shared.</p>
 Opportunities for Improvement	<p>The AER develop a plan to update the documentation to align with the C&IR Framework, expectations of Indigenous Peoples and municipalities interviewed, as well as lessons learned by the AER as a result of the Kearl incidents. In order to implement this, the AER should consider the following:</p> <ul style="list-style-type: none"> • Create clear guidelines for Board communication, specifying shared information, communication frequency, timing, and preferred methods. • Establish an escalation protocol for incidents and emergencies, defining the chain of command and steps to escalate information to the Board.

Appendix: Policies, Procedures and Manuals

Appendix: Policies, Procedures and Manuals Reviewed

Deloitte was provided with documentation as a part of this Review, but it should be noted that the list of documents provided is not comprehensive of all policies, procedures, guidelines, and manuals at the AER. Deloitte was directed to relevant documentation for this review by management.

Q4 Key Performance Metrics Scorecard
Q4 Key Performance Metrics Slides
AB-NWT Water Management Agreement
Admin Boundaries Map
Administrative Penalty Preparation
Adverse Impact to Groundwater
AER AUC Inspection & Incident Rates
AER AUC MOU
AER Bulletin 2016-22, Leak Detection
AER Contravention Report
AER Emergency Management Program Manual 2022 11 01
AER Manual 021 Contamination Management
AER Triage Table 2023 Mar 20 - Update
AER-2022-MOU0005 AER-IOGC Signed
AER-Edge 2021 MOU
AER Release Reporting Presentation
Annual Reporting Activity Requirements 2022 June
ASTM D3839-08 Guide
Attributes and Behaviours - Behaviour Continuum
Attributes and Behaviours - Our Values and Attributes
AUC Contacts
Baseline Assessment Checklist 2022 03 01
CIC Call Handling Procedures for the Coordination and Information Centre 2016 02 04
Closure and Liability Closure Collapsed Features
Closure Flow Diagram
Closure Procedure
Coal Mine Inspection Manual
Coal Mine Inspection Training Guide
Collapsed Features Assessment Form
Compliance & Liability Management
Compliance Assurance Procedures Manual
Compliance Dashboard Noncompliance Enforcement Tab Submission Procedure 2022-04
Contamination Not Requiring AER and EOP Regulatory Oversight
Conversation Guide
Corporate Incident Management Plan 2022
Creative Sentencing Procedure
CSA Training I 2021 06 02
CSA Z662-19 Oil & Gas Pipeline Systems

De-hy Provincial Inventory
Directive 056 Pipeline Technical FAQ
Directive 077 Clause Locations in CSA Z662-15
Directive 058
Directive 071
Directive 077 2022 07 12
Guide to Laying Charges
Prosecution Procedure
EDGE Call Handling Procedures Update 2022
Elements Database Procedure
EM 2023 Annual Report
Environment Procedures Manual Revision 49 2023 01 31
Environmental Emergency Response Standard Operating Procedures (Jan 2021)
EPA EDGE Call Receiving and Handling Procedure
EPEA Approval & Ground Water Referral Contact List
Field Sampling Manual
Field Surveillance Incident Inspection List
File Brief Policy
File Naming
FlexSteel Installation and Operations Manual
Foam on Waterbodies
General Bylaw 2022 Sept 22
Goals and Conversations Q&A
Incident report
Inspection Report 1
Inspection Report 2
Inspection report 3
Inspection Report 4
Inspection Report and FIS PDF Final Report
Investigator Prosecution Checklist
IST PROC 006 - Issuing of Executive Incident Notifications and Situation Report
Manual 013 November 2019
Off Lease Emulsion Release
Order Procedure May 2020
Pipelines Procedure Manual Dec 1
Plain Language 1 Student Handbook
Plain Language 2 Student Handbook
Post Investigation Review

Production Procedures Manual 2020 01 03
Referral Contact List - Remediation Contamination
Release Prevention Checklist 2021 05 06
Release Reporting FAQ - 2018
Release Report
Remedial Action Plan Guide - GoA - 2020
Remediation Regulation
Responsible Energy Development Act
Safe Excavation Near Pipelines Brochure
SDM Meeting Policy
Spill of Unknown Origin
Spur After Action Report
Statutory Decision Making Guide
Suspended Facilities Checklist
The Inspector's Field Sampling Manual - Environment Canada
Tip Sheet - Pipeline Basic Inspection Questions
Training Course - AER Drilling Waste
Training Manual - Spill Response 2014-09
Transfer of Pipeline Records FAQ
Triage Review Process
Voluntary Self-Disclosure Form Instructions
Voluntary Self-Disclosure Form
VSD Form June 2016
VSD Process - FAQs June 2016
Warning Letter Procedure
Waste Management Facilities Introduction
Waste Management Facility Records Inspection Tip Sheet
Water and Fisheries Surveillance Program Plan



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