

Bulletin 2008-15

April 8, 2008

New Edition of *Directive 071: Emergency Preparedness and Response Requirements for the Petroleum Industry* Issued

The Energy Resources Conservation Board (ERCB) announces the release of the new edition of *Directive 071: Emergency Preparedness and Response Requirements for the Petroleum Industry*. The directive is effective immediately.

The directive includes significant changes to requirements, including many resulting from stakeholder feedback, and replaces the 2005 edition of *Directive 071*. Key changes are listed in Table 1 of the directive. Comments received during the consultation period are available on the ERCB Web site www.ercb.ca at http://www.ercb.ca/docs/documents/directives/directive071_comments.xls.

The use of the ERCBH2S computer software to calculate the emergency planning zone (EPZ) for sour operations is now mandatory and will be phased in according to the implementation scheme detailed in Attachment A. Supporting documentation for the software ERCBH2S, including a User Guide, is also available on the ERCB Web site.

The ERCB will be hosting *Directive 071* information sessions in May. See Attachment B for details on dates, locations, and registration.

Answers to commonly asked questions regarding *Directive 071* in an FAQ document are posted on the ERCB Web site. Stakeholders are encouraged to send additional questions by e-mail to directive71@ercb.ca.

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Attachments

Attachment A Implementation of *Directive 071* and the ERCBH2S Model

Effective April 8, 2008, the revised edition of *Directive 071*, including the ERCBH2S computer software to calculate the emergency planning zone (EPZ) for sour operations, becomes mandatory according to the implementation plan set out below.

1 Key Dates

April 8 to July 2, 2008

- Effective April 8, 2008, licensees are required to comply with the April 2008 edition of *Directive 071* unless the licensee is eligible for exemption, as outlined in Section 2: ERPs Eligible for Temporary Exemption below.
- There is a three-month phase-in period to July 2, 2008, for compliance with new requirements. During this time if noncompliance with any new requirements is found, the licensee will be warned, but full enforcement action will not be taken. After July 2, 2008, all noncompliance matters will be subject to full enforcement action, in accordance with *Directive 019: ERCB Compliance Assurance—Enforcement*.
- For new well, pipeline, and facility emergency response plans (ERPs), licensees must immediately follow the April 2008 edition of *Directive 071*, including the mandatory use of ERCBH2S. The new routine/nonroutine application process detailed in *Directive 071* must also be followed.
- **For applications currently before the Board in a hearing process, the decision to require the applicant to recalculate its EPZ using ERCBH2S and rewrite its plan in accordance with the requirements in the April 2008 edition of *Directive 071* will be at the discretion of the Board and considered on a case-by-case basis.**

July 2 to December 31, 2008

- All noncompliance matters will be subject to full enforcement action in accordance with *Directive 019* unless eligible for exemption as outlined below.
- Licensees must recalculate all well and pipeline EPZs within existing facility ERPs and submit the results to the ERCB's Emergency Planning and Assessment (EPA) Section.

December 31, 2008, to July 2, 2009

- The ERCB's EPA Section will assess the EPZ information submitted and provide a full implementation plan by July 2, 2009, for updating existing facility ERPs.

2 ERPs Eligible for Temporary Exemption from the Requirements in the April 2008 edition of *Directive 071*

In order to ensure a smooth transition to meeting the new requirements, the ERCB is granting some temporary exemptions to the requirements in the April 2008 edition of *Directive 071*.

2.1 Existing site-specific (Drilling and Completion) ERPs

- Licensees are permitted to continue to follow the requirements in the 2005 edition of *Directive 071* for ERPs submitted to the ERCB and/or approved prior to April 8, 2008.

2.2 Existing Sour Production Facility ERPs

Existing sour production facility ERPs are those that were submitted to the ERCB and received approval prior to April 8, 2008.

- Licensees may choose to update their existing production facility ERPs to meet the new *Directive 071* requirements, including calculating the EPZ using ERCBH2S, but this is not mandatory.
- Licensees choosing to recalculate EPZs using ERCBH2S and update their plans must consult with the public affected by the changes to the EPZ, including new residents who may now be included in the EPZ and those who may no longer be included due to the recalculation of the EPZ. Residents must be advised of the reasons for the changes and how they are impacted, pursuant to the April 2008 edition of *Directive 071*. A new ERP that meets all of the requirements in the April 2008 edition of *Directive 071* must be submitted to the ERCB for review.
- Licensees submitting supplements for well and pipeline tie-ins to existing sour production facility ERPs are required to calculate the size of the EPZ using ERCBH2S. However, response procedures within the supplemental ERP must be consistent with those in the sour production facility ERP.

For example: if a supplemental pipeline ERP is submitted to the ERCB after April 8, 2008, and is to tie into an existing sour production facility ERP that has **not** yet been revised according to the new requirements in the April 2008 edition of *Directive 071*, procedures in the supplemental pipeline ERP must meet the requirements of the 2005 edition of *Directive 071* until the full facility ERP is updated. This is to avoid the potential for confusion by having response procedures based on different requirements.

- For ERPs not being immediately updated, licensees must recalculate all EPZs for wells and pipelines within the facility ERP using ERCBH2S and submit the results to the ERCB by **December 31, 2008, or earlier**. Licensees are encouraged to submit these data as soon as possible to assist the ERCB in its analysis. This is in order to better understand the significance of future updates required to plans to fully comply with the new *Directive 071* requirements and to assist the ERCB in preparing a time-line for submission of updates,

Licensees must submit the ERCBH2S data as "Comma Separated Value" files by e-mail to Directive71@ercb.ca, as detailed in the User Guide.

After considering the EPZ information submitted and other feedback, the ERCB will develop a full implementation plan for existing ERPs for full compliance and make it available on or before July 2, 2009.

3 HVP Operations

- Operators are strongly encouraged to apply the technical parameters covered in the Pipeline Operators Study entitled *EPZ Analysis for HVP Pipelines* (available from the Canadian Association of Petroleum Producers [CAPP] on its Web site www.capp.ca). All HVP licensees must submit changes to plans for compliance by July 2, 2009.

Attachment B *Directive 071* Information Sessions

Directive 071 and the ERCBH2S computer software to calculate the emergency planning zone (EPZ) for sour operations have been posted on the ERCB Web site www.ercb.ca. The new edition of *Directive 071* is effective April 8, 2008.

The ERCB will be holding a series of information sessions on the directive to highlight the key changes. These sessions are intended for anyone who has an interest in emergency response planning associated with the drilling and production of sour gas. Please note that these are general information sessions. Specific training on the use of the directive and ERCBH2S will not take place during these sessions.

Participation is based on a first-come, first-served basis. To register, please e-mail your request to Directive71@ercb.ca. Ensure that "Directive 071 Registration" is included on the subject line of your e-mail. Please limit the number of registrants to five people per company.

City	Date	Venue	Time	Capacity
Calgary	May 23, 2008	Calgary TELUS Convention Centre Glen 206 2nd Floor South Building 120 – 9 Avenue SE	10:00 a.m. – 12 noon	150 people
Calgary	May 23, 2008	Calgary TELUS Convention Centre Glen 206 2nd Floor South Building 120 – 9 Avenue SE	1:30 p.m. – 3:30 p.m.	150 people
Red Deer	May 26, 2008	Red Deer Lodge Hotel and Conference Centre Red Deer Room 4311 – 49 Ave	1:00 p.m. – 3:00 p.m.	100 people
Edmonton	May 27, 2008	Best Western Westwood Inn and Convention Centre Ebony Room 18035 Stony Plain Road	10:00 a.m. – 12 noon	150 people
Edmonton	May 27, 2008	Best Western Westwood Inn and Convention Centre Ebony Room 18035 Stony Plain Road	1:30 p.m. – 3:30 p.m.	150 people
Grande Prairie	May 29, 2008	Pomeroy Inn and Suites 11710 – 102 Street	8:30 a.m. – 10:30 a.m.	100 people