Emergency Response Plan Registration Guide

Accessing DDS and the Emergency Response Plan Service

The Emergency Response Plan service (ERP service) is part of the Alberta Energy Regulator's Digital Data Submission (DDS) system. The ERP service lets you electronically register and maintain emergency response plans as required by *Directive 071: Emergency Preparedness and Response*.

A valid Digital Data Submission (DDS) user ID is required to use DDS. Follow these steps to sign in and access DDS and the ERP service:

1. Navigate to the DDS system home page.
2. Enter your DDS user ID and password.
3. Navigate the following path: AER > Submissions > Emergency Response Plan.
4. On the right-hand side of the screen, select either **Register Emergency Response Plan Service** or **Maintain Emergency Response Plan Service** to open the appropriate screen.

If you are a delegate for more than one licensee, select the licensee on whose behalf you are acting. Use the Licensee Selection screen.

For more information about DDS, see the DDS System User Guide.

ERP Types

Section 5 of *Directive 071* identifies two types of ERPs: AER-approved ERPs and corporate ERPs.

AER-Approved ERPs

See appendix 3 of *Directive 071* for information on the types of operations requiring an AER-approved ERP.

Operational

HSC (hydrocarbon storage cavern): This type applies to both new and existing operations.

- **New operations**: Select when new storage caverns require an AER-approved ERP.
- **Existing operations**: Select when storage caverns are already in use and require an ERP because of a licensee change (purchase, transfer, merger).

HVP (high vapor pressure): This type applies to both new and existing operations.

- **New operations**: Select when new pipelines require an AER-approved ERP.
- **Existing operations**: Select when active operations require an ERP because of a licensee change (purchase, transfer, merger) or major EPZ change.

Sour Prod (sour production ERP): This type applies to new and existing sour production gathering systems, including wells, pipelines, and facilities, which require an AER-approved ERP.

- **New operations**: Select when any sour production gathering system, including wells, pipelines, and facilities, requires an AER-approved ERP.
- **Existing operations**: Select when the gathering system is already in production and requires an ERP because of a licensee changes (purchase, transfer, merger) or major EPZ change.

Sour Well Crit (sour well critical): This type applies to critical sour wells undergoing drilling, completion, workover, testing, or re-entry operations.

Sour Well NonCrit (sour well noncritical): This type applies to noncritical sour wells undergoing drilling, completion, workover, testing, or re-entry operations.

Supplemental

Sour Well Supp (sour well supplement): This type applies to drilling, completion, workover, or testing of a sour well within an existing sour production EPZ with surface developments within the well EPZ.

Tie-In Supp (tie-in supplement): This type applies to new wells, pipelines, or facilities under construction that will be tied into existing operations already covered by an AER-approved ERP. This type also applies to a newly purchased sour gathering system that will be tied into existing sour operations already covered by an AER-approved ERP.

Corporate and Other Types of ERPs

Where an AER-approved ERP is not required, the duty holder may use its corporate ERP to manage emergency response and preparedness. Corporate ERPs are subject to AER review and audit and are only submitted to the AER using the DDS if the AER requests it for review or audit.

Select from the following choices for ERP type:

- **Corporate ERP**: Select this ERP type for a corporate ERP for review or audit.
- **Other**: Select this ERP type for other types of ERPs, spill contingency plans, or supporting documents for review, audit, or hearing purposes.

Register a New ERP

Select **Register Emergency Response Plan** from the menu to register a new ERP. There are six steps to register a new ERP (detailed instructions are provided below):

1. Input licensee contact information.
2. Input the ERP name and select the plan category.
3. Input licences associated with the ERP.
4. Input any comments, including the nature of the submission.
5. Upload the ERP and any required supporting documentation in the proper format.
6. Submit the ERP.

You can save the registration at any step up to step 5 (file upload). Once files are uploaded at step 5, you must proceed directly to step 6 (submit). You can cancel a saved registration at any time before step 5. A cancelled registration cannot be retrieved.

Step 1: ERP Contact Information:

Input the licensee ERP contact information, if required, in the Contact Details area. All fields are required. If applicable, provide consultant contact details.

Default contact information is displayed based on the DDS account settings. To change the default contact information, remove it and input new information.

Step 2: Specify the ERP Plan Details

Input the ERP name and select the **Plan Category** in the Plan Details area. Complete the ERP information in the Plan Details area.

Each ERP must have a name, registration number, category, and type.

New plan registrations will be assigned a unique number when the plan is first saved. A submission acknowledgement notice with the ERP authorization number will be issued after you save a plan registration the first time. Saving does *not* mean the plan registration has been submitted.

Input the following information to complete this Plan Details area:

- If this plan is a supplement to an existing ERP, input the ERP reference number of the existing ERP in the **Primary ERP Plan Ref #** field. Click **Search** to use the ERP Advanced Search utility to find the existing ERP.
- Input the ERP name in the **ERP Name** field.
- Use the **Category** drop-down list to select the ERP category.
- Input the distance in kilometres to the nearest urban centre in the **Proximity to Urban Centre** field. *(For a Well ERP, the distance is measured from the well centre. For an Sour Production ERP, the distance is measured from the main facility within the EPZ.)*
- Input the name of the nearest urban centre in the **Name of Urban Centre** field.

- Input the size in kilometres of the *largest* EPZ in the **Size of EPZ** field. *(For operational ERPs, this will be the largest EPZ for the operations in the ERP.)*
- Input the number of surface developments in the **Total # Surface Developments** field. *(Surface developments include permanent dwellings, manned facilities, public facilities, and trapper's cabins. See Directive 071 for a definition of surface development.)*
- Enter the maximum H_2S release rate in m^3/s during an incident in the **Maximum H2S Release Rate** field.
- Enter the maximum H_2S volume in m^3 that can be released during an incident in the **Maximum H2S Release Volume** field.
- Input the highest H_2S concentration per cent in the **Highest H2S%** field.
- Input the legal subdivision (**LSD**), section (**SEC**), township (**TWP**), range (**RG**), and meridian (**M**) for the surface location. *(If this is a Sour Production ERP, use the location of the main facility or, where there are no facilities, the location of a well within the gathering system or the location of a pipeline.)*

Step 3: Add Licences

Licences can be added by direct input on the Site Specific Details area or bulk upload from a file.

Input all licences associated with the ERP in the Site Specific Details area. Include all licences that involve H_2S operations within the EPZ.

Direct Input

1. Select the licence type using the **Search for a Licence** drop-down list (F for facility, P for pipeline, W for well).
2. Input the licence number in the **Search for a Licence** field.
3. Click **Add to List** to add the licence to the list.

Bulk Input File

If uploading licence numbers from a file, you must create either a text file (.txt) or a comma-separated value file (.csv) that contains the licence numbers to be added.

File Upload

Follow these steps to upload the file:

1. Click **Upload List** on the Emergency Response Plan Registration screen.
2. Click **Browse**. The Choose File dialogue box opens.
3. Navigate to the file containing the licence numbers you wish to upload and select this file.
4. Click **Open**. The dialogue box closes, and the complete file path is shown in the **Select File to Upload** field.
5. Click **Upload**. The licence numbers in the file will be added to your ERP site-specific details. The Emergency Response Plan Registration screen will reopen when the process has completed.

Consider breaking the upload into more than one file if you have more than 100 licences to add.

File Format

Both .txt and .csv files are acceptable for upload. File names must start with a single uppercase letter to indicate the licence type (i.e., W for well, F for facility, P for pipeline), followed by a comma and the licence number (no separating space). Here are some examples of valid upload file names:

- W,0000939.txt or W,0000937.cvs
- F,11423.txt or F,11425.cvs
- P,1013.txt or P,1017.cvs

All licence numbers in this file must be in the correct format for a successful upload. If one licence number is incorrect, the upload will fail.

If you use a spreadsheet application such as Excel to create a .cvs file for well licences, you will need to add any leading zeros to the licence number (e.g., licence W0000939 may show as W939).

To set the correct licence number format in Excel:

1. Select the cells containing the licence numbers.
2. Right-click and choose **Format Cells** to open the Format Cells dialogue box.
3. Click **Number** tab and select **Custom** from the list.
4. In the **Type** entry field, input 0000000# (licences are seven digits).
5. Click **OK**.

Step 4: Comments

Add comments to be included with the plan registration, including those detailing the nature of the submission.

Describe the purpose of the submission and provide any information that may assist the AER in reviewing the documents. Submissions that are unexpected and without an explanation of the ERP's purpose may be subject to closure.

Step 5: Upload Documents

Use the Emergency Response Plan and Support Documents screen to upload a ZIP file (.zip) of the ERP and any applicable supporting documentation (e.g., D71 Application form, ERCBH2S .csv file). Only ZIP files are allowed for upload. There is no naming convention for the ZIP file. Follow these steps to upload the ZIP file.

1. Click **Browse**. The Choose File dialogue box opens.
2. Navigate to the ZIP file containing the documents you wish to upload and select the file.
3. Click **Submit**. The documents are submitted to the AER. *(The Submission Acknowledgement screen will open when the process has been completed.)*

You can only upload the ZIP file when submitting to the AER. You cannot upload a file and then use the save function.

Use these naming conventions for the documents in the ZIP file:

- ERP: [BA Code]-ERP[ERP#]-[Date] (example, ABCD-ERP2100-24Jun2016)
- Application Form: [BA Code]-[ERP#]-AppForm (example, ABCD-2100-AppForm)
- ERCBH2S CSV: [BA code]-[ERP#]-[Date] (example ABCD-2100-24Jun16.csv). The naming convention for ERCBH2S .csv files remains unchanged and can be found in the ERCBH2S User Guide on the AER website (see *Directive 071* landing page).

The ERP in the ZIP file is a searchable Adobe PDF with working bookmarks for key sections. Ensure all figures and spatial information submitted in the PDF documents is at a scale that enables review and uses minimum 300 dpi for images. Documents marked as "draft" or "sample" will not be accepted.

Submissions that are missing applicable documentation or do not meet the specified format requirements are subject to closure, and the licensee may be required to resubmit. Do not submit documents other than those specified above in support of your submission unless requested to by the AER.

Step 6: Submit

Saved ERP registrations are not visible to AER staff. The ERP and supporting documents can only be uploaded when ready to submit.

To submit an ERP registration:

- Click **Submit**. *(The ERP registration will be sent to the AER and the Submission Acknowledgement screen will open.)*

Submitted ERP registrations cannot be cancelled.

Once an ERP registration has been submitted, it can be modified using the ERP Maintenance screen.

Maintain an Existing ERP

Use the ERP Maintenance screen to

- register updates to an existing ERP,
- view the status of an ERP review, and
- record when a plan is no longer in effect.

ERP Status

Approved: The AER has reviewed the ERP and issued an approval letter.

Plan Received: An emergency planning and assessment (EPA) analyst has been assigned, and the ERP is currently under review.

Revised: The applicant has changed an ERP with a status of "Submitted" or "Approved." You can make changes to the ERP registration and resubmit it. A resubmitted ERP registration will continue to have a status of "Revised."

Submitted: The AER has received the ERP, but an EPA analyst has not reviewed it yet. You can make changes to the ERP registration and resubmit it. A resubmitted ERP registration will change its status to "Revised."

To select an ERP to update:

1. Select **Select Existing ERP**.
2. Select the ERP to update using the **Select Existing ERP** drop-down list.
3. Click **Continue**. The ERP Maintenance Screen opens.

To view ERPs that are pending:

- Select **View Pending Emergency Response Plans**.
- Click **Continue**. The Emergency Response Pending List screen opens.

Annual Updates and Revisions

Annual updates: Duty holders must review plans annually, so the DDS system is to be updated annually, whether there are major changes to the ERP or not. Use the ERP maintenance screen to update previously entered information. In the comments section, provide a brief summary of the changes or a comment stating, "a review was completed, and no changes are necessary." Even if there were no major changes, ensure an updated ERP file is provided to the AER annually (the ERP revision history page should be updated to identify this). Annual updates submitted without documents or clarifying comments may be flagged for audit.

(Important: Before submitting an annual update, ensure the "annual update complete" box is checked, otherwise the submission will be registered as a revision.)

Revision: Licensees can update ERP information or submit updated ERP files at any time via the maintenance screen. The information and files will be updated in the AER system. It is important to clarify why the revision is being submitted in the comments section. Submitting a revision to an ERP does not fulfil the requirement for an annual update.

ERP Exercise Notifications

Submit ERP exercise notifications using the Field Surveillance tab. Select **Notifications**. Link the notification to a specific well, facility, or pipeline licence. Select **ERP exercise** as type of notification. Provide details about the exercise in the comments section, including exercise type, ERP approval numbers tested, where the exercise location, and a brief overview of the exercise scenario.

Frequently Asked Questions

How do I get a user ID and password?

Contact your company DDS administrator for a user ID and password to access DDS. Your company DDS administrator can contact the AER DDS administrators at DDSAdministrator@aer.ca for support in setting up user accounts.

If your company does not have a DDS administrator, details on obtaining a Digital Data Submission (DDS) account are provided on the DDS system home page. You can also contact the AER DDS administrators directly at DDSAdministrator@aer.ca.

Can I track the progress of the ERP review?

Yes, you can check the current status of the ERP in the Maintain section.

If we submit an electronic registration for an operational sour production ERP, how long will it take to review and approve?

AER staff will strive to review and approve new ERP registrations within ten business days. Incomplete submissions may take longer to process. Email EPAhelpline@aer.ca if your review is outside the ten-day window and you wish to receive an update on its status.

Do I need to submit my annual corporate ERP update to the AER?

No. The AER does not require submission of a licensee's corporate ERP via DDS unless the AER requests it for review or audit.

The ERP submission options have changed in DDS. Do I need to submit a new ERP registration if the ERP type associated with my existing ERP has been discontinued?

No. The following ERP submission options have been removed from DDS to align with the latest version of *Directive 071*:

- Site Specific: HSC, HVP, Sour Prod, Sour Well Crit, Sour Well non-Crit
- Supplemental: Operating Area Supp

Approved ERPs listed under these discontinued subtypes now fall under the "operational" categories. These ERPs will be available for update in DDS. The AER will update the ERP type as annual updates or revisions are submitted.

How do I submit or update my CORE ERP?

The AER no longer supports CORE ERP submissions or the parent-child ERP model. This process existed to alleviate the administrative burden and cost associated with submitting multiple paper ERPs to the AER that mostly contained the same "core" information. Now that the submission process is fully electronic, the AER expects each operational ERP submission to include the full ERP document.

Does max H_2S% concentration mean the highest H_2S concentration for all facilities and wells in the entire gathering system?

Enter the highest H_2S for the entire gathering system. The value entered may not necessarily match the asset with the largest EPZ. The intent is to capture the maximums.

Is the largest EPZ calculated for the entire gathering system?

No, it is the largest EPZ within the gathering system based on a well, facility, or pipeline, whichever is the largest.

What do we enter if the nearest urban centre is within the EPZ?

The distance to the nearest urban centre is determined relative to the well or facility location that the EPZ is calculated. For drilling and completions ERPs, it is the distance from the centre of the well. For production ERPs, it is the distance from the main facility (gas plant or battery).

What are the limitations for the numeric fields?

Max. H_2S% concentration: three digits and four decimals
Max. H_2S release rate (m^3/sec): four digits and four decimals
Max. H_2S release volume (m^3): three digits and two decimals
Proximity to nearest urban centre (km): four digits and zero decimals
Size of largest EPZ (km): three digits and two decimals
Total # of surface developments: 5 digits

When printing certain DDS screens, some of the information on the right side is missing?

Some DDS forms are too wide to be printed on 8½ × 11-inch paper. Try changing the page orientation to landscape before printing the screen. Most browsers allow you to change the orientation using the Page Setup option found on the File menu.