

ACTION PLAN FOR ERCB DECISION 2010-022

PETRO-CANADA

APPLICATIONS FOR ELEVEN WELL LICENCES, ONE MULTIWELL GAS BATTERY LICENCE, AND TWO PIPELINE LICENCES

ACTION ITEM	REQUIRED ACTION/COMMENTS	DECISION: 2010-022	ERCB PROCESS TO ENSURE FOLLOW-UP	STATUS & EVIDENCE
1 Eden Valley Evacuation Procedures Document	The Board believes that a separate and self-contained document containing step-by-step procedures for the evacuation of the Eden Valley Reserve must be created and will condition Petro-Canada's approvals accordingly... This document is to include evacuation measures, the number of persons involved in facilitating the evacuation of Eden Valley Reserve residents, any designated areas that emergency response personnel are to focus on during an incident, and the location of resources that would be called upon to assist in evacuation procedures.	Section: 7.1.3 Paragraph 9 P. 35	The EPA group will review the document as part of its ERP evaluation process.	Pending - On May 28, 2012, Suncor withdrew all 13 of its Sullivan applications. Therefore, this action plan is now closed.
2 Backcountry Notification Procedures in ERP	The Board will condition Petro-Canada's licences to require that its ERP include copies of the notification signs, pamphlets, or placards that Petro-Canada stated it could place along backcountry access routes, trails, and campgrounds. Further, the Board will condition the licences to address the posting of these notification signs at all recognized backcountry entry and exit routes within the Project area.	Section: 7.1.3 Paragraph 11 P. 35	The EPA group will review the documents submitted under this requirement as part of its ERP evaluation process.	Pending -
3 Odour Complaint Investigation	The Board will condition Petro-Canada's approvals to require that every odour complaint be investigated.	Section: 7.1.3 Paragraph 12 P. 35	Petro-Canada/Suncor will provide the ERCB with evidence relating to this condition on an annual basis.	Pending -

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4 Additional Notification Devices	The Board will condition Petro-Canada's licence to require that an additional notification device be provided to the Eden Valley Reserve and incorporated into Petro-Canada's ERP. Petro-Canada must complete the installation of the additional notification device prior to the commencement of operations.	Section: 7.1.3 Paragraph 13 P. 35	Petro-Canada/Suncor will submit evidence of the installation of the notification device to the EPS group and it will be evaluated as part of the ERP evaluation process.	Pending -
5 ERP Exercise	The Board will condition the approvals to require that a full-scale ERP exercise be completed prior to commencement of operations. This exercise is to include the commitments made by Petro-Canada to hold the exercise on the reserve and to include the Eden Valley Reserve residents as participants.	Section: 7.1.3 Paragraph 15 P. 36	Petro-Canada/Suncor will submit evidence of the ERP exercise to the EPS group and it will be evaluated as part of the ERP evaluation process.	Pending -
6 Upgrade Residences	<p>The Board is satisfied with Petro-Canada's commitments to assess each residence on the reserve for its suitability to shelter in place and identify and upgrade at least one room in each residence to make it suitable for sheltering. The Board will require Petro-Canada to fulfill these commitments on a one-time basis and prior to the commencement of operations.</p> <p>Also see section 7.1.1: Petro-Canada stated that rooms suitable for sheltering in place would be identified in each Stoney Nakoda Nation residence. Petro-Canada would make modifications to ensure that at least one of the rooms was suitable for sheltering-in-place purposes. Petro-Canada further stated that it would carry out periodic reviews of the conditions of the homes or rooms for sheltering in place. It indicated to the Stoney Nakoda Nation that it was willing to accept these commitments as conditions of approval.</p>	Section: 7.1.3 Paragraph 14 P. 36	Petro-Canada/Suncor will submit evidence of the shelter in place upgrades to the EPS group and it will be evaluated as part of the ERP evaluation process.	Pending -

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7 NIA	The Board directs Petro-Canada to submit a revised NIA based on final equipment selection for the proposed Option 1 central facility site at three receptor locations that must meet the requirements of Directive 038 prior to Project start-up. The revised NIA must also include the noise contribution associated with the surface facilities of well sites at well pads and work camps associated with the drilling program.	Section: 8.8.3 Paragraph 1 P. 82	Petro-Canada/Suncor will submit a revised NIA prior to start-up. The Environment Group will review the documents as part of its evaluation process.	Pending -
8 Post-commissioning sound survey	The Board also directs Petro-Canada to conduct a post-commissioning comprehensive sound monitoring survey to verify compliance with Directive 038 within six months of Project start-up.	Section: 8.8.3 Paragraph 2 P. 82	Petro-Canada/Suncor will submit this report to the ERCB within six months of start-up. The Environment Group will review the report as part of its evaluation process.	Pending -
9 Monitoring Plans	In order for monitoring to be meaningful in terms of evaluating project effects, it is important that monitoring plans be developed that include a clear statement of desired outcomes and measures of success. The Board directs Petro-Canada to work with SRD and AENV to develop acceptable monitoring plans prior to commencement of construction. In addition to the monitoring identified by Petro-Canada, the Board expects that the need for monitoring effects on aquatic ecosystems, grizzly bears, and wolves will be discussed with SRD and AENV.	Section: 8.9.3 Paragraph 7 P. 87	Petro-Canada/Suncor will submit its environmental monitoring plans to the ERCB prior to start-up.	Ongoing - November 25, 2011 Meeting held with AEW and SRD re: watercourse monitoring framework. Awaiting formal response from AEW. September 2011 Grizzly bear and wolf monitoring plans, as well as a watercourse sediment monitoring framework, accepted by SRD. SRD has forwarded the watercourse sediment monitoring framework to AEW. Copies available from Suncor upon request.
10 Groundwater Monitoring	The Board directs that Petro-Canada provide a plan for the Board's approval for the installation and monitoring of the wells [at the central processing facility].	Section: 8.3.3 Paragraph 3 P. 59	Petro-Canada/Suncor will submit its well-monitoring plans to the ERCB prior to start-up.	Pending -

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11 Spoon-leaf Moonwort	The Board notes Petro-Canada's commitment to employ construction methods that would allow it to narrow its trunk line ROW as much as possible during construction of the proposed Project in order to minimize disturbance to the spoon-leaf moonwort population. The Board directs that this commitment be reflected in Petro-Canada's EPP, including the Construction Alignment Sheets.	Section: 8.4.3 Paragraph 4 P. 65	Petro-Canada/Suncor will submit its EPP to the ERCB prior to start-up.	Pending -
12 Pipeline reclamation	The Board also notes Petro-Canada's commitment to reclaim its existing fuel gas pipeline along Highway 532. The Board directs Petro-Canada to initiate reclamation immediately following abandonment of the line.	Section: 8.4.3 Paragraph 5 P. 65	Petro-Canada/Suncor will provide the ERCB with an annual update regarding the abandonment and reclamation of the fuel gas line until a reclamation certificate is obtained.	Pending -
13 Environmental Inspector	The Board directs Petro-Canada to have an environmental inspector on site at all times during construction of the proposed Project who is capable of identifying weeds and invasive agronomic species.	Section: 8.4.3 Paragraph 7 P. 66	Petro-Canada/Suncor will provide the ERCB with evidence relating to this condition at start-up and every six months thereafter until the completion of construction.	Pending -
14 Grizzly bears - monitoring	The Board directs Petro-Canada to assist in any monitoring programs that may be initiated in the area by SRD and will assist in managing factors that contribute to grizzly bear mortality in the Project area.	Section: 8.5.3 Paragraph 2 P. 74	Petro-Canada/Suncor will provide the ERCB with evidence relating to this condition at start-up and annually thereafter.	Pending -
15 Wolves - dens	The Board directs Petro-Canada to work with SRD to determine activity of wolves in the vicinity of the known dens and rendezvous sites. If activity is confirmed, then Petro-Canada must abide by any restricted activity period and setback that SRD believes is appropriate.	Section: 8.5.3 Paragraph 5 P. 75	Petro-Canada/Suncor will provide the ERCB with evidence relating to this condition at start-up and annually thereafter.	Pending -

The conditions imposed in approvals/licence(s) are monitored by the Alberta Energy Resources Conservation Board (ERCB). The ERCB has developed a process whereby an action plan is developed internally to ensure that ERCB staff monitor conditions arising from decision reports for compliance. The conditions are managed in an action plan that is updated quarterly with statuses of conditions. The action plan defines the action required, timeframes for completion, and a summary of the evidence provided to confirm a condition was met. For more information, please contact the Action Plan Administrator at (403) 476-4783.