




ERCB Release Reporting Requirements

December 2011

Disclaimer

The following information is provided for guidance and summary purposes only and is not an exhaustive description of ERCB requirements relating to a given topic or subject area.

Operators and licensees must at all times comply with and should consult all applicable ERCB requirements before undertaking any activity.



Emergency Preparedness and Response Requirements ERCB Directive 071:

- Each licensee must submit for approval to the ERCB a spill contingency plan or be a member in good standing of a spill cooperative
- A spill contingency plan must address a liquid spill onto land or water from any well, pipeline or facility. The plan must include purchasing spill clean up equipment and conducting annual exercises



Western Canadian Spill Services (WCSS):

- Is the only recognized spill cooperative in Alberta
- To be a member in good standing requires annual membership fees and attendance at an annual exercise
- Failure to pay membership fees: ERCB issues High Risk Enforcement
- Non-attendance at “area” exercise: ERCB issues Low Risk Enforcement

A photograph showing three men in a field. One man on the left is wearing a white shirt and a brown cap. The man in the middle is wearing a plaid shirt and a brown cap. The man on the right is wearing a blue jacket and a white hard hat. They appear to be engaged in a conversation. In the background, there is a large green piece of machinery, possibly a tractor or a pumpjack, in a field of tall grass.

Oil and Gas Conservation Regulations Section 8.050:

- When oil, water or unrefined product is spilled or released the licensee shall immediately take steps to contain and clean up the spill or release
- The licensee or operator shall immediately orally report the size and location of the spill to the appropriate field centre of the Board.
- When directed by the Board, submit a written report
- Contaminated soil is managed by ERCB Directive 058: “Oilfield Waste Management Requirements for the Upstream Petroleum Industry”



Spill/Release Reporting Requirements

- Informational Letter IL 98-1: ERCB/AENV MOU
- OGCR: 8.050, 8.051, 8.190, 7.040 and 12.140
- Pipeline Regulations Section 77

Licensee must “orally report” to the ERCB “at the first available opportunity” for:

- any release more than 2m³ on lease
- any release off lease
- any release or break from a pipeline
- pipeline hits
- uncontrolled gas release > 30e³m³
- any release that may cause, is causing or has caused an adverse effect
- any well flowing uncontrolled
- any fire where loss exceeds 2m³ of oil, or 30 000m³ of gas or where damage to well head occurs
- any burning of effluent from a well or facility



Release from a load line, on lease $<2\text{m}^3$, non-reportable to the ERCB, but must be cleaned up and contaminated soil removed.



Spill Reporting Requirements IL 98-1 MOU between AENV/ERCB

Purpose of IL is the one window approach for those reporting requirements that overlap jurisdiction

For unrefined product releases:

- primary contact is the ERCB Field Centre (overlap: Licensee is required to notify AENV if the spill is off lease or on lease if there is an adverse impact)
- oil, condensate, produced water, pipeline breaks
- the ERCB notifies AENV

For refined product releases:

- primary contact is AENV if there is an adverse impact
- diesel, gasoline, sulphur, solvents

Adverse Impact is defined in Environmental Protection and Enhancement Act.



Underground tank failed the integrity test. Licensee excavated tank and removed contaminated soil. The contamination had migrated and impacted a large area, approximately 1000 m³ of contaminated soil removed and there is evidence that the groundwater was adversely impacted. This is a reportable spill.

A photograph on the left side of the slide shows three men standing in a field of tall grass. One man is wearing a white hard hat and a dark jacket, another is wearing a plaid shirt and a baseball cap, and the third is wearing a white t-shirt and a baseball cap. In the background, a green tractor is visible. The scene is set outdoors under a clear sky.

Spill Reporting Requirements IL 98-1 MOU between AENV/ERCB

- Industry operator reporting a release to the ERCB or AENV (as appropriate) is responsible to inform any private individuals whose lands may be affected by the release.
- The industry operator must notify the landowner of any release that occurs off lease, migrates off lease or occurs on an easement or right-of-way.
- Reminder that landowner cooperation is essential in being able to quickly respond to a release that is not on the normal working area of your lease site.

A photograph showing three men in a field. One man is wearing a white hard hat and a dark jacket, another is wearing a plaid shirt and a cap, and the third is wearing a white t-shirt and a cap. They appear to be in a discussion. In the background, there is a large green piece of machinery, possibly a tractor or a pump. The field is filled with tall, golden-brown grass.

Release Reports

- When you report a spill to the ERCB, a release report will be sent electronically from the ERCB Field Centre
- Licensees will complete the form and e-mail it to the originating Field Centre (usually within 7 days)
- Include the total volume of spilled material and where it was disposed of

RELEASE REPORT

Initial verbal notification of release to the ERCB is required prior to completing the spill report.

ERCB FIS Incident No:

General Information: ERCB Notified Date & Time ERCB Contact

Incident Date: & Time: Licensee Name:
 Incident Location: W Licence #:
 Form Completion Date: Form Completed by: Telephone Number: (780)

Volume Details:

What was released?	Released	Recovered	Licence or WM #	Location
Crude Bitumen	10 m ³	m ³	WM 042	W
	m ³	m ³	Shipped to:	W
Gas	10 ³ m ³		Shipped to:	W
Excavated soil removed:	m ³		Shipped to:	W
Excavated soil cleanup date:			Free Fluids cleanup date:	

Contaminated Soils Storage: Onsite Off-site (If off-site, enter location): W

Impact:

Release Offsite Release Onsite H₂S Concentration: (unit of measurement) % ppm mole/kmole
 Public Affected Wildlife/Livestock Affected Area Affected: m Environment Affected:
 Environmental Contractor: Phone Number: (780)
 Jurisdiction Type: Landowner Notified (specify details in agency notified box below)
 Number Evacuated: Injuries/Fatalities: WH& S Notified Number of Injuries: Number of Fatalities:

Pipeline Details:

Pipeline Failure Cause:
 Licence Number: Line Number: Start Location: W End Location: W
 Associated Facility Location: W
 Test Failure Cathodic Protection
 External Coating: Retest
 Pipe Prestested Corrosion Mitigation/Monitoring Program:
 Normal Operating Pressure kPa Date line shut in: Pipeline Returned to service: Yes Date:

Additional Notifications	NAME OF AGENCY	PERSON NOTIFIED	TELEPHONE	DATE
			(780)	
			(780)	

Incident Details:

Root cause of release:
 Action taken to contain the release & clean up operations:
 Environmental Impact:
 Please explain what your company will do to prevent similar future incidents of this nature:
 Additional comments:

Please forward electronically to ERCB at . Providing a written report is a legislated requirement of the Environmental Protection and Enhancement Act. If the licensee forwards this report to AENV at erc.environment@gov.ab.ca within 7 days it may fulfill the legislated requirement of the Environmental Protection Act.



High Risk Noncompliance's Involving Spills

- No notification of reportable spill to ERCB
- Spill not contained or cleaned up
- Contaminated materials stored directly on the ground
- Liquids pumped off lease not meeting the requirements in Directive 055
- Well/facility closer than 100 m to a body of water without appropriate protective measures

A photograph showing three men in work clothes and hard hats standing in a field of tall grass. In the background, a green piece of machinery, possibly a generator or pump, is visible. The scene is outdoors under a clear sky.

Low Risk Noncompliance's Involving Spills

- Required measures not incorporated to prevent overfilling of tanks
- Secondary containment not designed, constructed, sized, and maintained as required
- Facility not maintained in a clean condition

Facility located within 100 meters of a body of water





Methods of Contaminated Soil Cleanup and Expectations

Options for remediation of contaminated soils:

- **Treat in situ (in place) AENV jurisdiction/approval**
- **Excavated contaminated soil is ERCB jurisdiction**
 - Remediation on site: land treatment/biopile
 - Remediation off site: land treatment/biopile
 - Waste storage component on existing oil/gas facility
 - Transfer contaminated soil to a WMF
 - Transfer contaminated soil to a landfill



Contaminated Soil Cleanup and Expectations

- No ERCB approval is required if land treatment and biopile is done on the site it was generated. If removing contaminates to another active oil and gas site for treatment, then ERCB approval and landowner approval is required.
- For a biopile the contaminated soil must be placed on a liner, biodegradation is assisted by aeration, adding nutrients.
- Expectation of all spill clean ups is that soil meets AENV Tier 1 guidelines for remediation.



ERCB and AENV Roles/Responsibilities For Spills

Informational Letter IL 98-2: Suspension, abandonment, decontamination, and Surface Land Reclamation of Upstream Oil and Gas facilities.

ERCB role and responsibility:

- containment and recovery of any free produced fluids
- excavated contaminated materials managed by ERCB Directive 058

AENV role and responsibility:

- delineate extent of contaminated soils
- remediate contaminated soils to meet AENV Tier 1 guidelines



Properly constructed Biopile- bermed with a liner for run-on and run-off control

Note: Compacted substances will have to be tilled



ERCB Field Centres and WCSS Spill Coop boundaries





Conclusion

There will be spills and some will have an impact on the environment.

Licensees need to be aware of the expectations for containment, clean up, disposal, and reporting requirements.