

November 22, 2019

Enforcement File: 2019-079FSJ

Tidewater Midstream and Infrastructure Ltd.
900, 222 3rd Ave SW
Calgary, AB, T2P 0B4

Attention: Mr. Scott McLean

RE: Warning: Fail To Maintain Response Contingency Plans

Dear Mr. McLean,

Tidewater Midstream and Infrastructure Ltd. (Tidewater) is a permit holder under the *Oil and Gas Activities Act* for 21 facilities, 57 wells, and 34 pipelines in British Columbia.

From August 19, 2019 to August 23, 2019, the Commission conducted an audit of Tidewater's Response Contingency Plans for the Federal and Graham, Noel, Inga, Pocketknife, and Sikanni and Lily operating fields.

The Commission's audit resulted in the discovery that Tidewater had neither maintained the above Response Contingency Plans in accordance with CSA Z246.2 nor to the satisfaction of the Commission.

On August 28, 2019 the Commission issued General Order 2019-008 to Tidewater, requiring that Tidewater submit an updated emergency response program to the satisfaction of the Commission and as prescribed by the Emergency Management Regulation (EMR). The order also required Tidewater to provide the information required by the EMR to the parties prescribed by section 13(1) of said regulation. General Order 2019-008 was to be satisfied by September 11, 2019.

Following Tidewater's submissions as per General Order 2019-008, the Commission continued a dialog with Tidewater regarding required revisions to the submitted Response Contingency Plans.

On October 16, 2019 and October 17, 2019 the Commission conducted a second audit of the Response Contingency Plans submitted by Tidewater and discovered several items of concern. These items were discussed with Tidewater, who subsequently satisfied the Commission's inquiries and concerns.

On November 7, 2019 the Commission issued Tidewater a Termination Letter to General Order 2019-008.

It is noted that Tidewater has no previous non-compliance for failing to maintain Response Contingency Plans. Given the circumstances, Tidewater is hereby issued a warning for the following:

Tidewater, on or about August 19, 2019, at or near Fort St. John, in the Province of BC, did fail to prepare and maintain a response contingency plan satisfactory to the Commission as per section 38(1)(b) of the *Oil and Gas Activities Act*.

Tidewater, on or about August 19, 2019, at or near Fort St. John, in the Province of BC, did fail to prepare and maintain a plan in accordance with CSA Z246.2 as per section 5(1) of the Emergency Management Regulation.

If Tidewater has any questions about this matter please feel free to contact the undersigned.

Sincerely,

<original signed by>

Compliance & Enforcement Officer
BC Oil and Gas Commission