



QUESTIONS AND ANSWERS

Online Minor Incident Reporting System

June 2014

COMPLIANCE AND REPORTING

Q: What if we don't know all the details of an incident within the required reporting period?

The information required on the minor incident form is information that should be readily available at the time of the incident. It is possible to change information after an incident has been reported by sending an email request to EMP@BCOGC.ca.

On Level 1, 2 and 3 incidents, the Commission will collect the available information at the time of the initial call and information not supplied on the initial call will be collected from ongoing updates.

Q: Is this information going to be made available to the public and in what capacity?

The Minor Incident reports are not made available to the public, but may be subject to information requests.

REPORTING TIME FRAME

Q: Reporting a Minor Incident within 24 hours seems unrealistic for business operations.

Permit holders may allow as many employees as required to submit reports online, and online reporting can be performed from any location where there is access to the Internet. This will allow the permit holder to meet the 24-hour reporting requirement.

As well, before the Commission developed the Online Minor Incident Reporting System, an incident was required to be reported "promptly." We have now created the new category of Minor Incident and have extended that reporting to 24 hours.

The permit holder may need to make internal changes to their processes to allow for Minor Incident reporting.

Q: How do we report Major Incidents (as per the *Consequence And Probability Matrix*) within one hour while we are busy dealing with the incident to ensure employee and public safety?

The one-hour timeline for Major Incidents allows the Commission to become informed of what is happening in regards to public safety and where public complaints and questions may be directed to the Commission or RCMP. It also allows Commission personnel to attend the site to ensure the emergency is being handled appropriately.

Putting a timeline on reporting clarifies the Commission's expectations for legal reporting requirements as per *The Oil and Gas Activities Act* and Emergency Management Regulation. [OGAA Sec 37 states that a "...permit holder must promptly report to the Commission..." and the Emergency Management Regulation Sec 13 (c) states "notify the commission as soon as the circumstances permit."]

Under the Emergency Response Plan, the Liaison Officer would be doing the reporting to the government agencies and not the incident response personnel.

The Commission will collect the available information at the time of the initial call and will expect updates on an ongoing basis.

CONSULTATION

Q: How was industry consulted on the new minor incident reporting?

The Minor Incident reporting system is part of the Commission's move to more Electronic Submissions as part of its Business Transition Strategy (BTS).

The Commission is using different strategies to get industry's feedback on our BTS process, and to make sure they know what to expect. These include:

- A BTS web page on the Commission's main website under the "Industry Zone" tab
- Periodic Industry Bulletins that contain information about upcoming information sessions
- Training sessions (*two to date*)
- Notifying the Commission Communications industry emailing list [industry can be added to the list by contacting OGC.communications@BCOGC.ca]
- An industry working group, which met three and half years ago. The matrix was part of the discussion around emergency management.

Q: Were other government agencies involved in the development of these requirements, such as Ministry of the Environment, WorkSafeBC, local authorities, etc.?

Information collected by the Commission is often not required by other agencies. The Consequence and Probability Matrix was designed to capture the full scope of what is required for incidents relevant to the Commission.

It is the responsibility of the permit holder to meet the requirements of other agencies.

DEFINITIONS

Q: What are the differences between spill, release, and discharge?

Spills, releases, or discharges are different terms that all mean the same thing to describe anything that is released into the environment in any way by air, land or water.

The Spill Reporting Regulation defines spills as "a release or discharge into the environment, not authorized under the Act, of a substance in an amount equal to or greater than the amount listed in Column 2 of the Schedule opposite that substance in Column 1."

Q: Do spills within secondary containment need to be reported?

Yes, spills within secondary containment do need to be reported. The provincial Ministry of Environment considers any release or discharge from primary containment to be a spill. As well, the cause of the spill would probably be a reportable incident, as the spill is the result of the incident.

Q: Why is a spill of 10,000 litres of fresh water a reportable quantity?

The Commission's goal is for permit holders to be good stewards of water and to conserve water. Ten thousand litres is a large amount of freshwater and the Commission is interested in knowing what happened to cause that much water to be released. Such a release may also have impacts on other uses, such as agricultural. A large release of water means an incident has occurred, and that incident would be required to be reported.

Q: What constitutes "moderate on-site equipment damage?"

Moderate on-site equipment damage does not require shut down of operations. Major on-site equipment damage would result in shutdown of operations.

Q: What constitutes a security breach that impacts oil and gas assets?

This applies to oil and gas operational assets that are part of the oil and gas infrastructure.

Q. What constitutes "security-related issues which are relatively minor?" Do we still report to the Commission if a report is already made to the police?

Yes. Under "other reportable incidents," security-related issues which are minor are defined as: A security threat or any other security incident that would be beneficial for other permit holders to be aware of to heighten awareness of security with their own assets.

Rank 1 under Consequence in the reporting matrix states "a security breach that has potential to impact people, property, or the environment means oil and gas operational assets that are part of the oil and gas infrastructure."

Q: Does "failure without release of any pressure control or ESD device" include maintenance function tests and replacements, such as during annual site shutdowns?

No. This requirement applies to failure during operations, not shutdowns.

Q: Is “other reportable incident” interchangeable with the term “Minor Incident?”

An “other reportable incident” may or may not be a Minor Incident depending on the score it receives on the *Consequence and Probability Matrix*. If it is an “other reportable incident” and it does not fit on the matrix, then it would be a Minor Incident.

Q: Why are “fatalities,” “worker hospitalized” and “emergency medical services” necessary to report to the Commission if they are already a WorkSafeBC requirement?

This has been removed from the matrix because if there is a fatality or injury from an oil and gas incident the incident is required to be reported and the injury or fatality is a result of the incident.

Q: How does the Commission define “near misses from mobile or excavation equipment?”

Near misses will be removed from the “other reportable incidents” as this is an integrity-management issue and records will be required to be kept but not reported as an incident.

Q: Form A: Minor Incident Notification Form includes a section for public first aid, hospitalization or fatality. Would these incidents not be a higher classification than “minor?”

First aid could be a Minor Incident but the Commission is changing the heading to “Worker Injuries.” If a member of the public had injuries, it would not be a Minor Incident. Hospitalization and fatality will be removed from the form as it would be a higher classification than minor.

Q: Is there a comprehensive list of what would classify as a Minor Incident?

It is impossible to anticipate every possible scenario. If it fits on the matrix or falls under other reportable incidents then it is reportable

GENERAL

Q: My question is not answered here.

Additional questions may be submitted to EMP@BCOGC.ca. Those of a general nature will be added to this FAQ and the updated FAQ will be posted to the Commission website.

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