



Changes to Emergency Response Plan Requirements

EFFECTIVE DATE: MAR. 1, 2018

The BC Oil and Gas Commission (Commission) is adopting an updated structure for Emergency Response Plans (ERPs) that mirrors current industry best practices and aligns with Commission transparency initiatives. Changes to ERP formats and submission processes will improve security of confidential information, enhance field staff accessibility to critical data, collate standard ERP practices into a common location, and reduce plan administration.

These changes are occurring by way of amendments to the Emergency Management Regulation (EMR), effective Mar. 1, 2018 (refer to [INDB 2017-27](#)). The [amended EMR](#) contains additional changes permit holders should familiarize themselves with including adoption of CSA Z246.2, Emergency Preparedness and Response for Petroleum and Natural Gas Industry Systems.

An effective date of Mar. 1, 2018 allows permit holders with plans currently under development, or being updated, to complete and submit their plans in the revised formats described below, if submitted on or after the effective date. If submitted prior to Mar. 1, 2018 plans will be accepted by the Commission as required under the current EMR, and will be valid for one year.

Types of Emergency Response Plans

Permit holders will be required to prepare ERPs in two parts - a Core Plan plus Supplemental plan(s).

The Core Plan will include all information generic to any of a permit holder's sites, operations, and locations. It will provide guidance to operations staff on common emergency management practices and processes, as well as standard company policies applied during an incident response. No confidential information should be saved within a Core plan.

It is important permit holders are aware the Commission intends to make Core plans received after Mar. 1, 2018 publicly available at www.bcogc.ca. The Commission will not undertake redaction of any information provided within a Core plan prior to publication.

The Supplemental Plan(s) will house site-specific confidential and personal information. These plans contain all unique information relevant to a permit holder's specific site, operation, or location. For example, contact information for responding resources, equipment locations (block valves, spill kits, etc.), and landowner information.

Supplementals can be any of the following types:

- A: Drilling & Initial Completions Supplemental Plan** - The permit holder should develop a drilling and initial completions supplemental ERP when involved in any drilling or initial completion operations (sweet or sour).
- B: Workover Supplemental Plan** – Permit holders can address a temporary increase in the hazard planning zone (HPZ) by submitting a workover supplemental plan, or updating the applicable section of their field supplemental plan.
- C: Field/Facility/Downstream Pipeline Supplemental Plans** - A Field or main transmission Pipeline Supplemental plan will include all assets (sweet and sour) and operations other than drilling and initial completions operations, decommissioned (abandoned) assets, or major processing facilities that have their own unique plan.
- D: Facility Supplemental Plans** - Major processing, storage, or other facilities that have a high degree of complexity or require specialized staff training should have their own unique emergency response plan. Smaller facilities such as a compressor plant, pump station, small battery site, etc. should typically be included in the applicable field or pipeline plan.

To ensure confidential information has been appropriately recorded, an ERP checklist must accompany an ERP when submitted to the Commission. This will support the Commission in completing the ERP review and acceptance process promptly and efficiently. An [ERP Submission Support supplemental](#) is available detailing each checklist item and should be reviewed before submitting an ERP and ERP checklist.

Checklists and guidance documents are available on the Commission's [Emergency Response and Safety webpage](#) to assist industry in the development and content of ERPs. Further support can be found in the latest version of the [Emergency Management Manual](#) in the [Documentation](#) section of the Commission website.

All ERPs will continue to be valid for one year and must be submitted in both electronic and hardcopy formats. ERPs will continue to be submitted via the Commission's FTP site until such time as E-Submission is expanded to include ERPs. [Industry Bulletin 2016-04](#) provides additional detail on the electronic submission process for ERPs.

Should you have any questions regarding this Industry Bulletin, please contact:

Peter Dalton
Director, Security & Emergency Management
Security and Emergency Management Branch
BC Oil and Gas Commission
EMP@bcogc.ca
250-794-5268