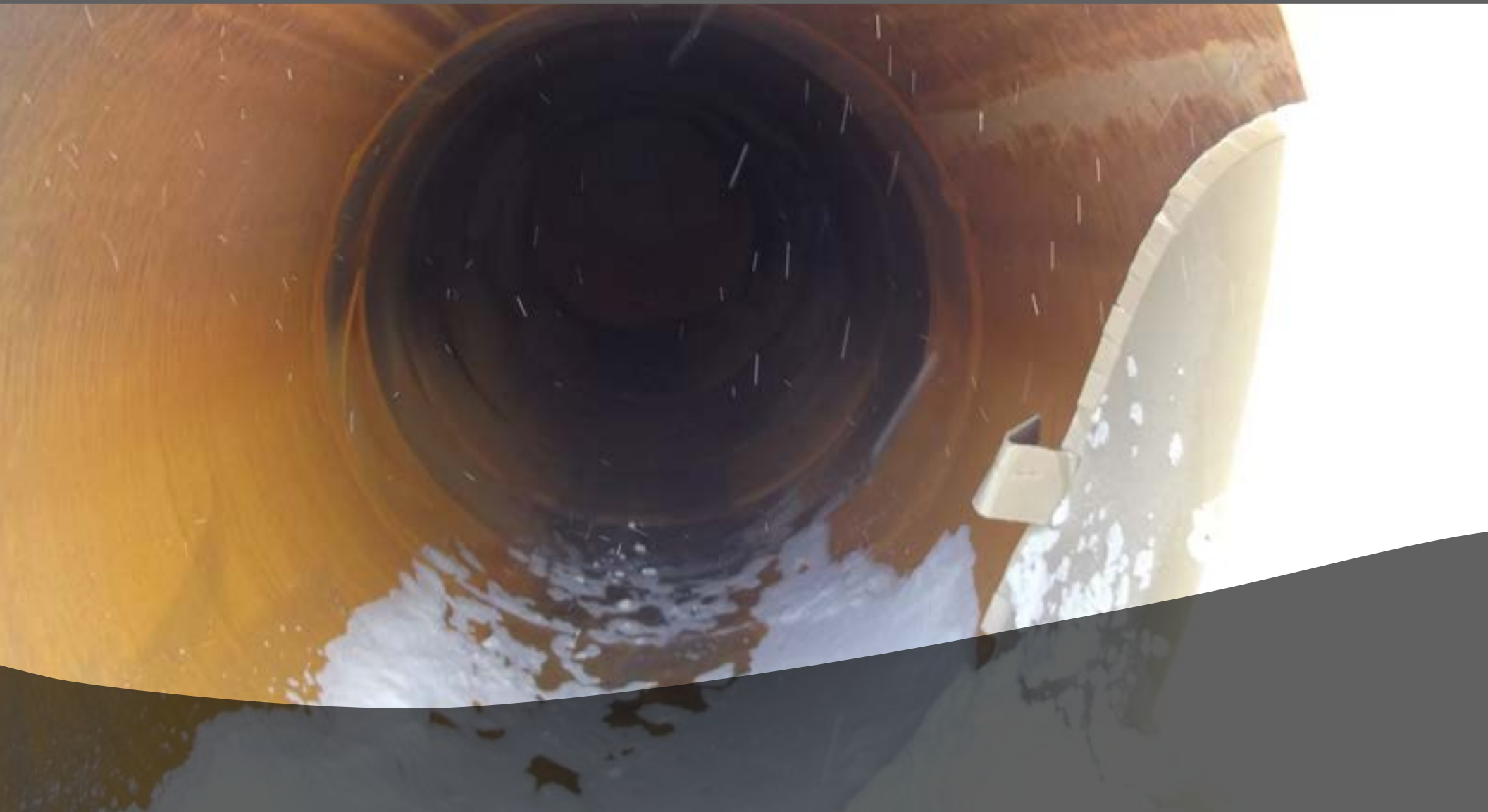


# Pipeline Performance Summary



2018 Annual Report



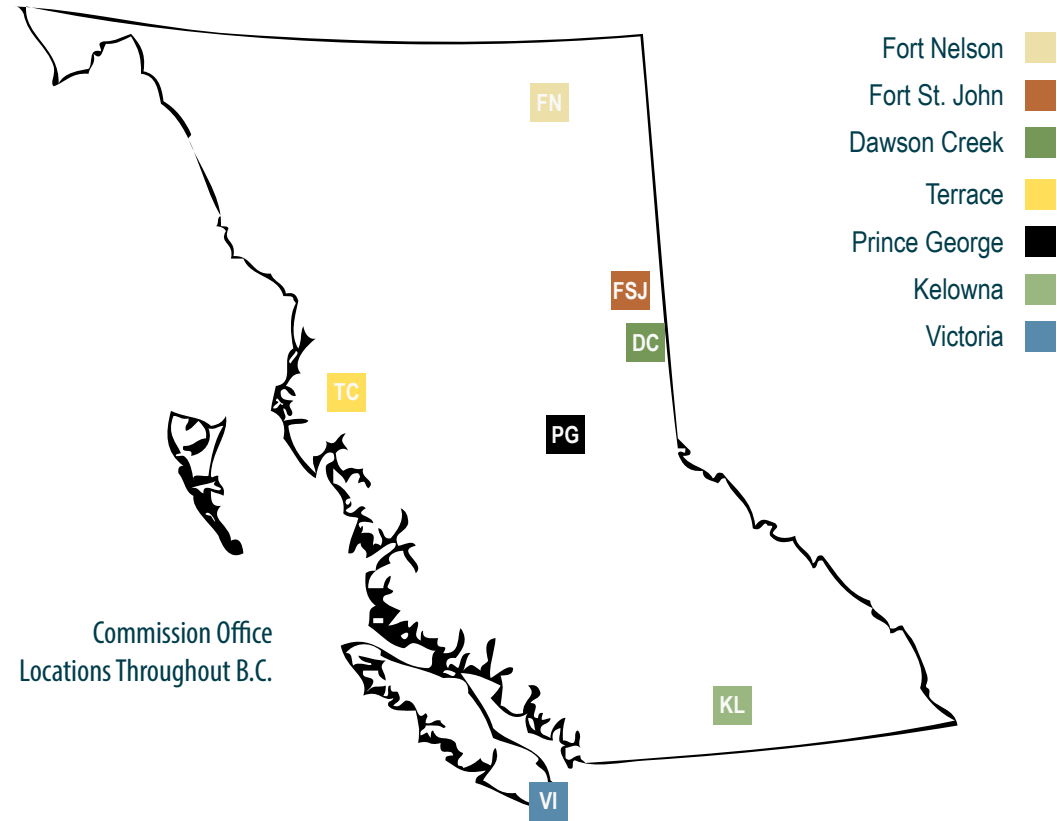
# Role of the BC OIL AND GAS COMMISSION

The [BC Oil and Gas Commission](#) (Commission) protects public safety and safeguards the environment through the sound regulation of oil, gas and geothermal activities in B.C.

From exploration through to final reclamation, the Commission works closely with communities and land owners, and confirms industry compliance with provincial legislation. It also ensures there are close working relationships; consults with, and considers the interests of Indigenous peoples.

With more than 20 years' dedicated service, the Commission is committed to safe and responsible energy resource management for British Columbia.

For general information about the Commission, please visit [www.bcogc.ca](http://www.bcogc.ca) or phone 250-794-5200.



The Commission's workforce consists of over 275 employees operating out of seven locations - Fort Nelson, Fort St. John, Dawson Creek, Terrace, Prince George, Kelowna and Victoria, with the largest number of employees concentrated in Fort St. John, the heart of oil and gas activity in the province. The offices in Fort Nelson and Dawson Creek ensure the Commission's presence in the communities of the Horn River Basin and Montney gas plays respectively.

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## OUR VISION

Safe and responsible energy resource development for British Columbia.

## OUR MISSION

We provide British Columbia with regulatory excellence in responsible energy resource development by protecting public safety, safeguarding the environment and respecting those individuals and communities who are affected.

## OUR VALUES

- Respect
- Integrity
- Transparency
- Innovation
- Responsiveness

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# INTRODUCTION

## PURPOSE OF REPORT

British Columbia's oil and gas industry depends on pipelines for the distribution of products such as natural gas, water and oil. Pipelines are recognized as a safe and efficient mode of transportation, and secure operation is essential to protecting public safety and the environment.

This report provides a statistical overview of pipelines regulated by the Commission in the 2018 calendar year. It includes data on types of pipelines, lengths, uses and pipeline incident rates. The multi-stage lifecycle of a pipeline is explained, and incident response protocols are outlined. It also summarizes the Integrity Management Program, a documented framework outlining the practices by which operators test and maintain pipelines to mitigate potential integrity issues.

Previous annual pipeline performance summaries can be found on the Commission's website at <https://www.bcogc.ca/publications/reports>

## PIPELINE REGULATION

The Commission's jurisdiction extends to the majority of pipelines in British Columbia, as defined in legislation by the [Oil and Gas Activities Act \(OGAA\)](#). Activities regulated by the Commission extend throughout the lifecycle of a pipeline, and include pre-activity consultation and notification, permitting, construction, operation, maintenance and abandonment. Pipelines not under the Commission's jurisdiction include those crossing provincial and/or national borders and gas utility pipelines, are not addressed in this report.

Pipelines are regulated under the [Pipeline Regulation](#), which states they must be operated and maintained in accordance with CSA Z662 – Oil and Gas Pipeline Systems. CSA Z662 is a national standard developed and maintained by the Canadian Standards Association (CSA) and covers the design, construction, operation and maintenance of oil and gas industry pipeline systems.

It is required that operators comply with other applicable regulations including the [Environmental Protection and Management Regulation](#), [Consultation and Notification Regulation](#), [Pipeline Crossings Regulation](#), and [Emergency Management Regulation](#).

The Commission is additionally responsible for provincial authorizations involving the Land Act, Water Sustainability Act, and the Forest Act for pipeline right-of-ways, roads, land clearing and other minor works.

The [Legislation](#) page of the Commission website provides the full list of acts and regulations governing oil and gas activities in the province.

## PIPELINE INVENTORY

47,066 KILOMETRES

The Commission's annual [Oil and Gas Reserves and Production reports](#) continue to show an upward trend in gas production year-over-year. This upturn contributes to increased pipeline capacity requirements and a gradual rise in the total number of pipelines.

Pipelines transport a number of refined and unrefined products including natural gas, sour natural gas, liquid hydrocarbons (such as crude oil and high vapour pressure hydrocarbons), water and other miscellaneous gases and liquids. Seventy eight per cent of the pipelines regulated by the Commission transport natural gas, while approximately 11 per cent carry liquid hydrocarbons. The remainder carry water or other gases or liquids. Pipeline definitions and product classifications are available on page 14.

As shown in Table 1, the total length of pipelines in the province in 2018 regulated by the Commission is 47,066 kilometres (km). This is a net addition of approximately 1,874 km of total registered pipelines (starting operation or reactivated) over the previous year. Deactivated pipelines increased by 1,474 km while abandoned pipelines increased by 671 km. Operating pipelines in 2018 decreased by 272 km.

**TABLE 1: TOTAL LENGTHS OF PIPELINES BY TYPE AND STATUS (IN KILOMETRES)**

TYPE	TOTAL	OPERATING	DEACTIVATED	ABANDONED
<b>Natural Gas</b>	21,831	18,932	1,738	1,160
<b>Sour Natural Gas</b>	15,056	11,365	2,923	768
<b>Water</b>	4,144	3,516	372	256
<b>Liquid Hydrocarbons</b>	5,213	3,904	805	504
<b>Other</b>	823	558	214	51
<b>2018 GRAND TOTAL</b>	<b>47,066</b>	<b>38,274</b>	<b>6,052</b>	<b>2,739</b>
<b>Natural Gas</b>	21,775	19,442	1,445	888
<b>Sour Natural Gas</b>	14,204	11,635	2,053	516
<b>Water</b>	3,659	3,198	241	219
<b>Liquid Hydrocarbons</b>	4,962	3,846	715	401
<b>Other</b>	592	425	123	44
<b>2017 GRAND TOTAL</b>	<b>45,192</b>	<b>38,546</b>	<b>4,578</b>	<b>2,068</b>
<b>Natural Gas</b>	21,773	19,843	1,162	768
<b>Sour Natural Gas</b>	14,062	12,103	1,595	364
<b>Water</b>	3,557	3,177	198	182
<b>Liquid Hydrocarbons</b>	4,816	3,953	577	286
<b>Other</b>	344	287	47	10
<b>2016 GRAND TOTAL</b>	<b>44,552</b>	<b>39,363</b>	<b>3,579</b>	<b>1,610</b>

# PIPELINE LIFECYCLE

## MULTI-STAGE PLANNING

From the creation of a preliminary pipeline plan, through construction and inspections, to deactivation and abandonment, the lifecycle provided here depicts the multiple stages of a typical pipeline from initial land surveys to final site restoration.

At the onset, Commission decision makers conduct a comprehensive review of each pipeline application for engineering standards, legal requirements, and for environmental and public safety considerations. The Commission ensures proponents have conducted consultations with land owners and other rights holders on pipeline projects that will directly affect them, including the legal obligation to consult and accommodate [First Nations](#).

If a pipeline application is approved, Commission specialists may set permit conditions as necessary to protect key environmental assets, such as water, wildlife and forest values. A significant component of the Commission's framework for managing the impacts of oil and gas development on the environment is [Area-based Analysis](#), described on the [Commission website](#).

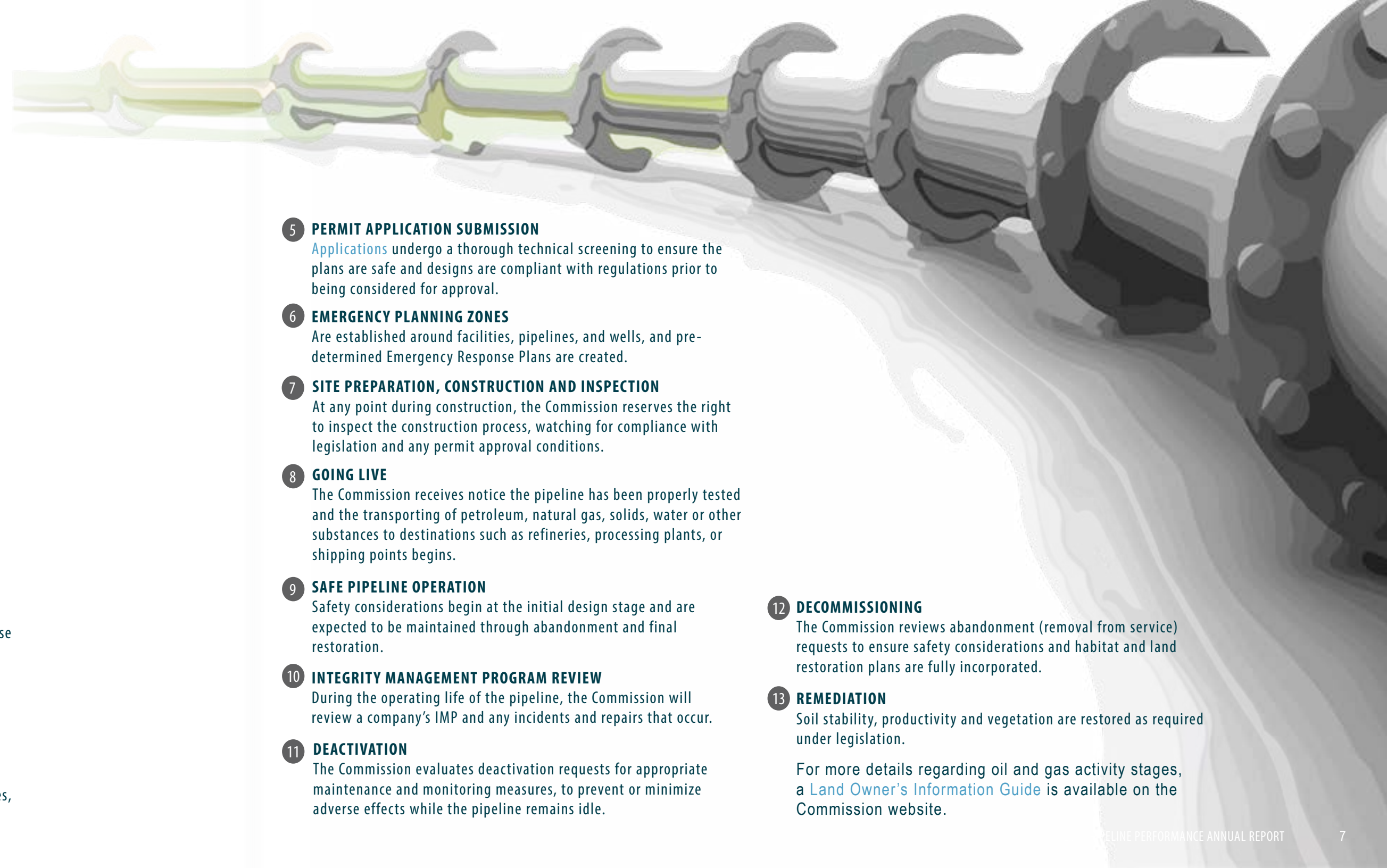
The Commission then ensures the pipeline is constructed and operated in accordance with

applicable regulations, confirms thorough inspections are performed, and monitors the project throughout its lifecycle. Should any deficiencies be identified at a site, the Commission may order the operator to cease activities as necessary until appropriate actions are performed to safely resume operations.

As detailed in the Commission's mandate, and considering the many stages of a pipeline's lifecycle, the protection of public safety and the environment is top priority. Permit holders are required to report to the Commission before, during and upon completion of their oil and gas activities. The framework under which pipelines are operated includes such initiatives as the pipeline Integrity Management Program (IMP), designed to help prevent spills and more so to maintain pipeline integrity, which in turn prevents unintended releases. IMPs are described on page 8.

## OIL AND GAS ACTIVITY STAGES

- 1 LAND SURVEY.**  
Land and airspace are measured to establish property boundaries, topography, and land features, and to develop surface maps.
- 2 PIPELINE PLAN.**  
A preliminary pipeline plan is prepared, utilizing survey data to propose a safe, informed and responsible pipeline route.
- 3 CONSULTATION AND NOTIFICATION.**  
Stakeholder engagement begins; the Commission is accountable for ensuring consultation is appropriate and adequate.
- 4 SITE ASSESSMENT.**  
The pipeline route is determined, taking into account such matters as soil handling and conservation, aquifer protection, archaeological sites, and eventual site restoration considerations.



- 5 PERMIT APPLICATION SUBMISSION**  
[Applications](#) undergo a thorough technical screening to ensure the plans are safe and designs are compliant with regulations prior to being considered for approval.
  - 6 EMERGENCY PLANNING ZONES**  
Are established around facilities, pipelines, and wells, and pre-determined Emergency Response Plans are created.
  - 7 SITE PREPARATION, CONSTRUCTION AND INSPECTION**  
At any point during construction, the Commission reserves the right to inspect the construction process, watching for compliance with legislation and any permit approval conditions.
  - 8 GOING LIVE**  
The Commission receives notice the pipeline has been properly tested and the transporting of petroleum, natural gas, solids, water or other substances to destinations such as refineries, processing plants, or shipping points begins.
  - 9 SAFE PIPELINE OPERATION**  
Safety considerations begin at the initial design stage and are expected to be maintained through abandonment and final restoration.
  - 10 INTEGRITY MANAGEMENT PROGRAM REVIEW**  
During the operating life of the pipeline, the Commission will review a company's IMP and any incidents and repairs that occur.
  - 11 DEACTIVATION**  
The Commission evaluates deactivation requests for appropriate maintenance and monitoring measures, to prevent or minimize adverse effects while the pipeline remains idle.
  - 12 DECOMMISSIONING**  
The Commission reviews abandonment (removal from service) requests to ensure safety considerations and habitat and land restoration plans are fully incorporated.
  - 13 REMEDIATION**  
Soil stability, productivity and vegetation are restored as required under legislation.
- For more details regarding oil and gas activity stages, a [Land Owner's Information Guide](#) is available on the [Commission website](#).

# INTEGRITY MANAGEMENT PROGRAM

## COMPLIANCE ASSURANCE

To ensure public safety, environmental protection, and operational reliability, the Pipeline Regulation requires all pipeline operators in the province implement an Integrity Management Program (IMP). Pipeline IMP is a preventative and documented framework specifying the processes and practices used by pipeline operators to anticipate hazards, and analyze and manage risks throughout the entire lifecycle of pipelines. The IMP programs incorporate a management system approach.

As per the B.C. Pipeline Regulation, Section 7, every pipeline permit holder planning, designing, constructing, operating, maintaining or abandoning pipeline infrastructure within the province must have developed and implemented IMPs. A compliance assurance protocol is available to operators, outlining Commission expectations and operating requirements, and provides

guidance for developing, implementing and maintaining effective IMPs. Details of the [compliance assurance process](#) and the scope of the protocol can be viewed on the Commission [website](#). The [2017 Pipeline IMP Compliance Assurance Summary](#) report is also on the website.

The Commission has been assessing the effectiveness of permit holders' IMPs since 2011. The pipeline IMP compliance assurance process consists of three phases (Figure 1). The first phase is operator prioritization and selection. Selected operators are required to complete self-assessment reporting documents and submit them to the Commission within a set timeline. The second phase consists of audits involving systematic review of operator IMP processes, records and documents in order to verify compliance and generate audit findings.

The third phase allows for corrective action plans and follow-ups to address any non-compliance discovered through the audits.

During 2018, the Commission audited the IMPs of seven pipeline operators. Where non-compliances were identified, operators were required to develop and implement corrective actions to rectify the deficiencies. The Commission monitors and assesses each corrective action to ensure all findings of non-compliance are fully resolved.

The Commission will continue to undertake IMP audits for all B.C. pipeline operators, engaging with companies to improve the design, construction, operation and maintenance of pipelines, including older, legacy pipes.



# PIPELINE INCIDENTS

## AND EMERGENCY RESPONSE PROGRAMS

To coordinate and prepare for incidents in advance, permit holders must develop and maintain emergency response programs and response contingency plans (ERPs), as directed in the [Emergency Management Regulation \(EMR\)](#).

Emergency response programs guide the creation, management and implementation of a permit holder's ERPs, allowing for quick access to critical information, coordination of multiple-responder activities, and identification of predetermined equipment and services available for deployment in an emergency. They equip incident responders with hands-on training and emergency response exercises, ensuring personnel understand their incident command structure, communication methods, and responsibilities in an emergency event.

The Commission's Security and Emergency Management Branch regularly audits ERPs to ensure consistent compliance with the EMR, and oversees and may participate in permit holder emergency response exercises. Should a permit holder's emergency protocols fail to meet requirements, the Commission may utilize compliance and enforcement actions, which may include issuing orders, penalties, or shutting-in a pipeline system.

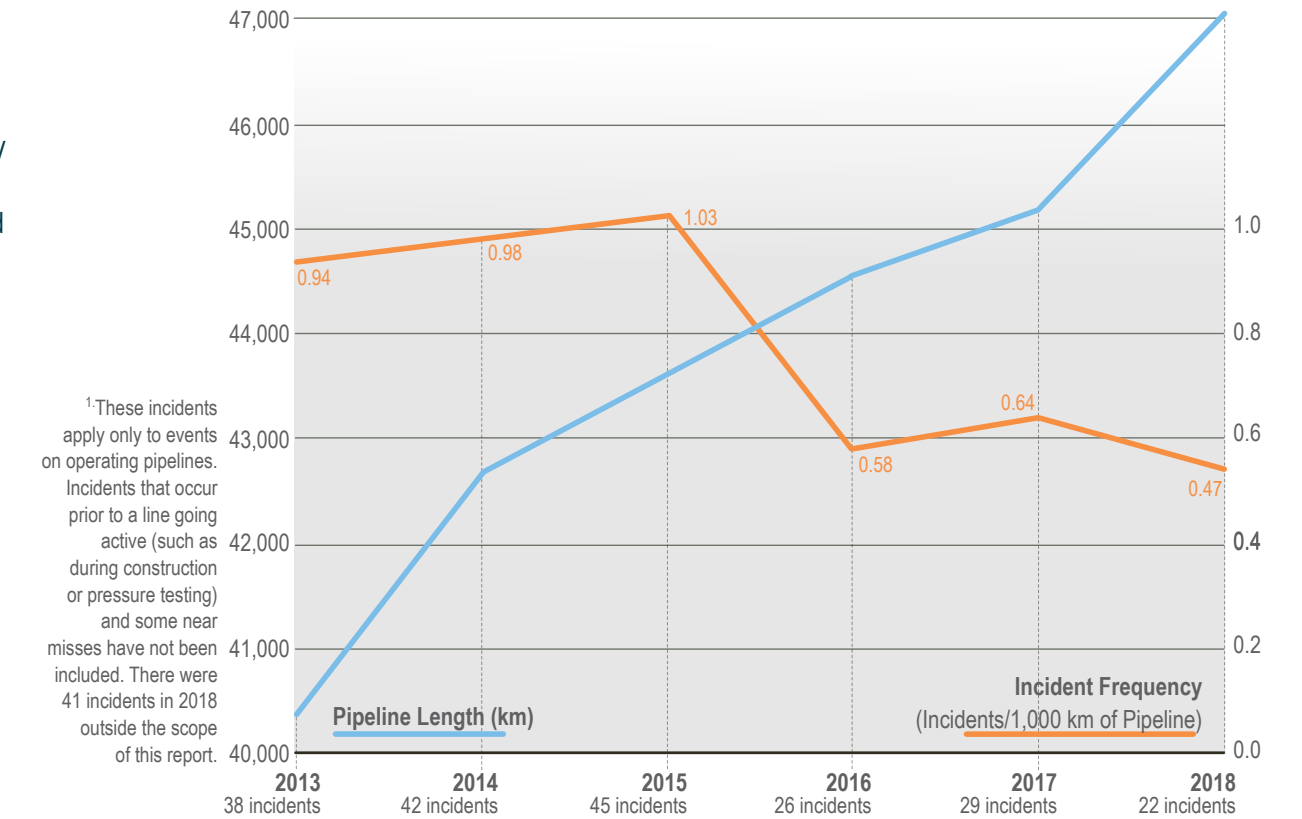
The requirements in the EMR are designed to create a framework for the protection of the public, emergency responders, property and the environment from incidents occurring due to oil and gas activities.

Although emergency preparation, equipment and protocols help reduce the rate of incidents, the Commission strives to continually improve emergency management measures.

In 2018 there were 22 incidents on pipelines regulated by the Commission<sup>1</sup>, however not all led to the release of a product. Figure 1 shows an overall incident frequency

of 0.47 for every 1,000 km of pipelines, a decrease from 0.64 in 2017. As stated, not all incidents result in a spill or release of a product. In 2010 the implementation of OGAA led to broader reporting criteria, meaning all incidents – including those that have the potential to affect the integrity of a pipeline but did not cause spillage – must be reported.

**FIGURE 1: YEAR TO YEAR INCIDENT FREQUENCY VS. PIPELINE LENGTH**



# INCIDENT RESPONSE

## AND ENFORCEMENT ACTIONS

An incident is defined as a present or imminent event or circumstance, resulting from an oil and gas activity that is outside the scope of normal operations, and may or may not be an emergency. Operators must communicate all reportable incidents to the Commission. Non-minor incidents must be reported immediately (within one hour), and minor incidents must be reported within 24 hours. The Commission's [Incident Classification Matrix](#) outlines spill reporting criteria, and how incident levels are assessed, determined and reported.

Any person aware spillage is occurring, or believes there is the potential for spillage, can provide assistance by calling the operating company indicated on the on-site signage and identifying the location of the pipeline, or by calling the Commission's 24/7 emergency number at 1-800-663-3456.

The Commission responds to all incidents, establishing communication with the operator, confirming the incident

level, and assessing the operator's response. Commission staff further determine what remedial actions must be taken, whether a pipeline can continue to operate safely, and whether compliance or enforcement actions are required.

Subsequent incident investigations allow the Commission to confirm the cause and any contributing factors, and whether repairs or solutions should be broadly communicated to all other operators to prevent similar incidents from occurring. Inspections may also be triggered by public enquiries and incidents reported to the Commission.

When required, Orders, tickets and/or penalties are issued to the operator. The Commission posts its enforcement actions in a timely and transparent manner by way of its [Compliance and Enforcement](#) webpage. Prior to March 2017, enforcement actions were communicated by way of quarterly [enforcement action summary](#) publications.

**ORDERS** - issued if an operator fails to comply with OGAA, associated regulations, permits or authorizations, a previous Order, or to deal with issues of public safety or protection of the environment.

**TICKETS** - issued under the authority of provincial acts, including the Water Sustainability Act.

**ADMINISTRATIVE PENALTIES** - levied in the event of a contravention of OGAA.

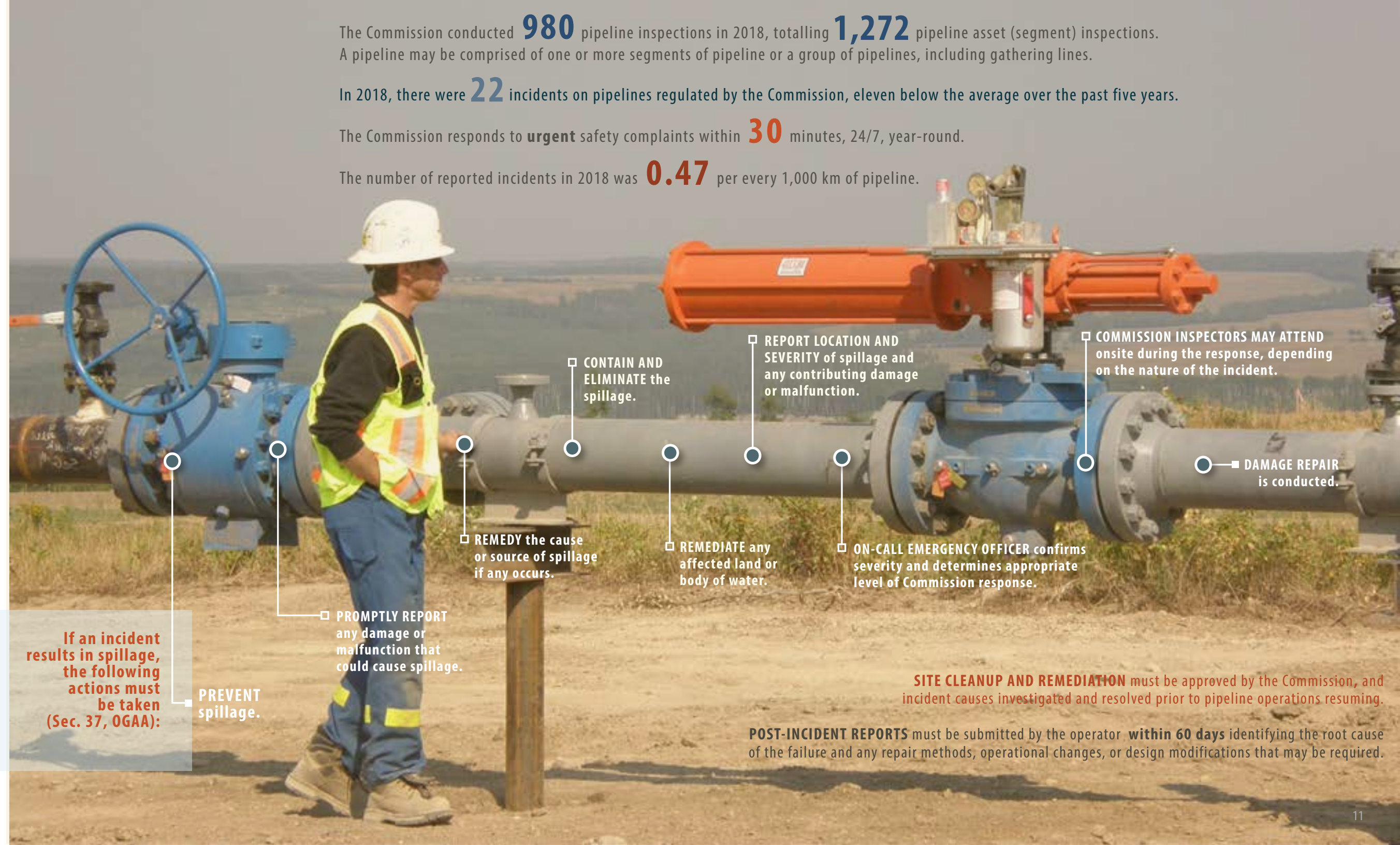
**CHARGES** - recommended to Crown counsel for prosecution and possible court conviction.

The Commission conducted **980** pipeline inspections in 2018, totalling **1,272** pipeline asset (segment) inspections. A pipeline may be comprised of one or more segments of pipeline or a group of pipelines, including gathering lines.

In 2018, there were **22** incidents on pipelines regulated by the Commission, eleven below the average over the past five years.

The Commission responds to **urgent** safety complaints within **30** minutes, 24/7, year-round.

The number of reported incidents in 2018 was **0.47** per every 1,000 km of pipeline.



**If an incident results in spillage, the following actions must be taken (Sec. 37, OGAA):**

**PREVENT** spillage.

**PROMPTLY REPORT** any damage or malfunction that could cause spillage.

**REMEDY** the cause or source of spillage if any occurs.

**CONTAIN AND ELIMINATE** the spillage.

**REMEDiate** any affected land or body of water.

**REPORT LOCATION AND SEVERITY** of spillage and any contributing damage or malfunction.

**ON-CALL EMERGENCY OFFICER** confirms severity and determines appropriate level of Commission response.

**COMMISSION INSPECTORS** may attend onsite during the response, depending on the nature of the incident.

**DAMAGE REPAIR** is conducted.

**SITE CLEANUP AND REMEDIATION** must be approved by the Commission, and incident causes investigated and resolved prior to pipeline operations resuming.

**POST-INCIDENT REPORTS** must be submitted by the operator **within 60 days** identifying the root cause of the failure and any repair methods, operational changes, or design modifications that may be required.

# RELEASES AND SPILLS

## 2018 STATISTICS

In terms of incidents that involved a release or spill, Table 2 shows sour natural gas pipelines had the lowest incident rate with a frequency of 0.07 per 1,000 kilometres.

Pipelines conveying product labeled as 'Other' transport miscellaneous liquids or gases, and had four release incidents. This category can also include service liquids and gases such as water/methanol mix and inert nitrogen gas.

In the event of a pipeline gas release or liquid spill, the Commission ensures complete clean up and remediation by the company, and that all problems are fixed before operations resume.

The largest gas release from a pipeline in 2018 was a

**TABLE 2: TOTAL NUMBER OF INCIDENTS WITH RELEASE PER 1,000 KM BY TYPE OF PIPELINE IN 2018**

TYPE OF PIPELINE	# OF INCIDENTS WITH RELEASE	LENGTH OF PIPELINE (KM)	FREQUENCY (PER 1,000 KM)
SOUR NATURAL GAS	1	15,056	0.07
NATURAL GAS	6	21,831	0.27
LIQUID HYDROCARBONS	2	5,213	0.38
WATER	3	4,144	0.72
OTHER*	4	823	4.86

\*All four incident releases were emulsions.

500 m<sup>3</sup> release of sour natural gas on Crown land outside of Fort Nelson by July Lake. The cause of the incident was a failed one-inch valve on a pig receiver (maintenance device) leading to the release of gas. Upon detection of the gas release, the pig barrel was isolated and the valve was replaced. The rest of the pigging barrel was examined to ensure no other leak points.

The largest liquid spill from a pipeline in 2018 was 10 m<sup>3</sup> of oil emulsion (primarily water, 9 m<sup>3</sup> of water, 1 m<sup>3</sup> of oil) on private land northeast of Fort St. John. The operator activated its emergency response plan and shut-in the pipeline and producing wells. The cause of failure was found to be internal corrosion. An environmental assessment company was contracted to assist with the assessment and cleanup. After the failure point was exposed, cut out, and a failure analysis was performed, the pipeline was removed from service.

## INCIDENT CAUSES

Table 3 shows metal loss (corrosion) was the leading cause of pipeline incidents in 2018, contributing to 10 incidents. External interference was the second leading cause of failures contributing to nine incidents.

The interactive web-based [BCOGC Incident Map](#) provides the location of pipeline incidents dating back to 2009. It includes data on pipeline spills, releases, and damage to active and discontinued pipelines, including the status of incidents.

## MOVING FORWARD

The Commission's number one goal is the continued refinement of safety standards through enhanced preparedness, prevention, response, and partnerships.

As tools are developed and operationalized to elevate pipeline performance, spill preparedness and emergency response capabilities, lessons learned will continue to be shared across the Commission and with stakeholders and experts throughout industry to successfully meet the demands of a strong safety culture.

Additional information regarding emergency response and management, including guidelines and forms, is available on the Commission's [Emergency Response and Safety webpage](#).

**TABLE 3: CLASSIFICATION OF PIPELINE FAILURES**

INCIDENT CAUSE	DEFINITION	2018	2017	2016	2015	2014	2013
<b>METAL LOSS</b>	Wall thickness reduction due, for example but not exclusively, to corrosion						
CORROSION METAL LOSS		10	15	12	25	21	22
<b>PIPELINE/EQUIPMENT FAILURE</b>							
CRACKING IN PIPE	Mechanically driven or environmentally assisted cracking of the pipe	0	0	1	0	3	0
PIPE FITTINGS/JOINT FAILURE	Failure in valve, weld, flange, etc.	3	3	3	1	0	4
MISC. PIPELINE INSTALLATION	Failure in riser, pressure vessel, etc.	0	0	0	4	0	0
<b>TOTAL PIPELINE/EQUIPMENT FAILURE</b>		<b>3</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>3</b>	<b>4</b>
<b>EXTERNAL INTERFERENCE</b>	External activities causing damage to pipe						
THIRD PARTY INTERFERENCE	Interference by someone other than operating company or its employees/contractors	3	5	5	3	1	5
COMPANY	Interference by operating company or its employees/contractors	0	4	2	4	8	4
VANDALISM	Interference caused willfully by someone through attempted theft of service fluid	0	0	0	0	0	0
<b>TOTAL EXTERNAL INTERFERENCE</b>		<b>3</b>	<b>9</b>	<b>7</b>	<b>7</b>	<b>9</b>	<b>9</b>
<b>MATERIAL MANUFACTURING OR CONSTRUCTION</b>	Defects in the fitting, construction or components	<b>2</b>	<b>0</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>
<b>GEOTECHNICAL FAILURE</b>	Loss of integrity due to geotechnical effect, for example, slope movement or weather	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>8</b>	<b>1</b>
<b>OTHER CAUSES</b>							
IMPROPER OPERATION	Decision error made by operating company during service	2	0	1	5	0	0
OVERPRESSURE	Failure caused due to overpressure of pipe	1	1	0	0	0	0
<b>TOTAL OTHER CAUSES</b>		<b>3</b>	<b>0</b>	<b>1</b>	<b>5</b>	<b>0</b>	<b>0</b>
<b>TOTAL INCIDENTS</b>		<b>22</b>	<b>29</b>	<b>26</b>	<b>45</b>	<b>42</b>	<b>38</b>

## GLOSSARY

### PIPELINES DEFINED

**PIPELINE:** pipelines regulated by the Commission are defined in OGAA (except in Section 9) as piping through which any of the following is conveyed or transported:

- Petroleum or natural gas.
- Water produced in relation to the production of petroleum or natural gas or conveyed to or from a facility for disposal into a pool or storage reservoir.
- Solids.
- Substances prescribed under Section 133(2)(v) of the Petroleum and Natural Gas Act.
- Other prescribed substances.

The scope of the definition also includes installations and facilities associated with the piping, but does not include:

- Piping used to transmit natural gas at less than 700 kilopascals (kPa) to consumers by a gas utility as defined in the Gas Utility Act.
- A well head.
- Anything else that is prescribed.

**ABANDONED PIPELINE:** pipelines removed from service and not maintained for a later return to service.

**DEACTIVATED PIPELINE:** pipelines removed from service but maintained for a later return to service.

**OPERATING PIPELINE:** pipelines actively used for the transport of fluids related to oil and gas operations, and piping that has been suspended from service for less than 18 months but not formally deactivated.

### PRODUCT CLASSIFICATIONS

**CRUDE OIL:** crude oil, sour crude and low-vapour pressure hydrocarbons.

**LIQUEFIED NATURAL GAS:** natural gas in its liquid form, achieved through cooling. The cooling process can reduce the volume of gas by 600 times, allowing for efficient transport. Includes sweet gas and fuel gas.

**NATURAL GAS:** includes natural gas, sweet gas, and fuel gas. Consisting mostly of methane, natural gas is a colourless, odourless, flammable gaseous hydrocarbon.

**OTHER:** miscellaneous gases and liquids, condensate and oil emulsion/effluent.

**SOUR NATURAL GAS:** natural gas with a hydrogen sulphide (H<sub>2</sub>S) partial pressure greater than 0.3 kilopascals.

### OTHER

**HIGH-VAPOUR PRESSURE (HVP) HYDROCARBONS:** examples include ethylene, propane, pentanes and liquid ethane. These products can quickly convert to gaseous form at atmospheric pressure.

**INCIDENT:** for the purposes of this report, a present or imminent event or circumstance, resulting from an oil and gas activity that is outside the scope of normal operations, and may or may not be an emergency.

**LOW-VAPOUR PRESSURE (LVP) HYDROCARBONS:** these products flow through pipelines in liquid or quasi-liquid form at a lower pressure than HVP hydrocarbons. Examples include oil, heavy oil, and synthetic oil.

**m<sup>3</sup>:** a measure of volume - cubic metres; 1m x 1m x1m; 1,000 litres.

**PIPELINE PERMIT:** a permit that includes permission to construct, maintain, and operate a pipeline.

**SHUT-IN:** the isolation or closure of a well zone, a pipeline or a facility. For example, the temporary shut-in of a well allows for the analysis of such factors as a well's productive capacity, pressure, and permeability.

**SPILL:** as defined in OGAA; petroleum, natural gas, oil, solids or other substances escaping, leaking, or spilling from a pipeline, well, shot hole, flow line, or facility (or any source apparently associated with any of those substances).

**WATER:** freshwater, produced water, salt water and sour water.