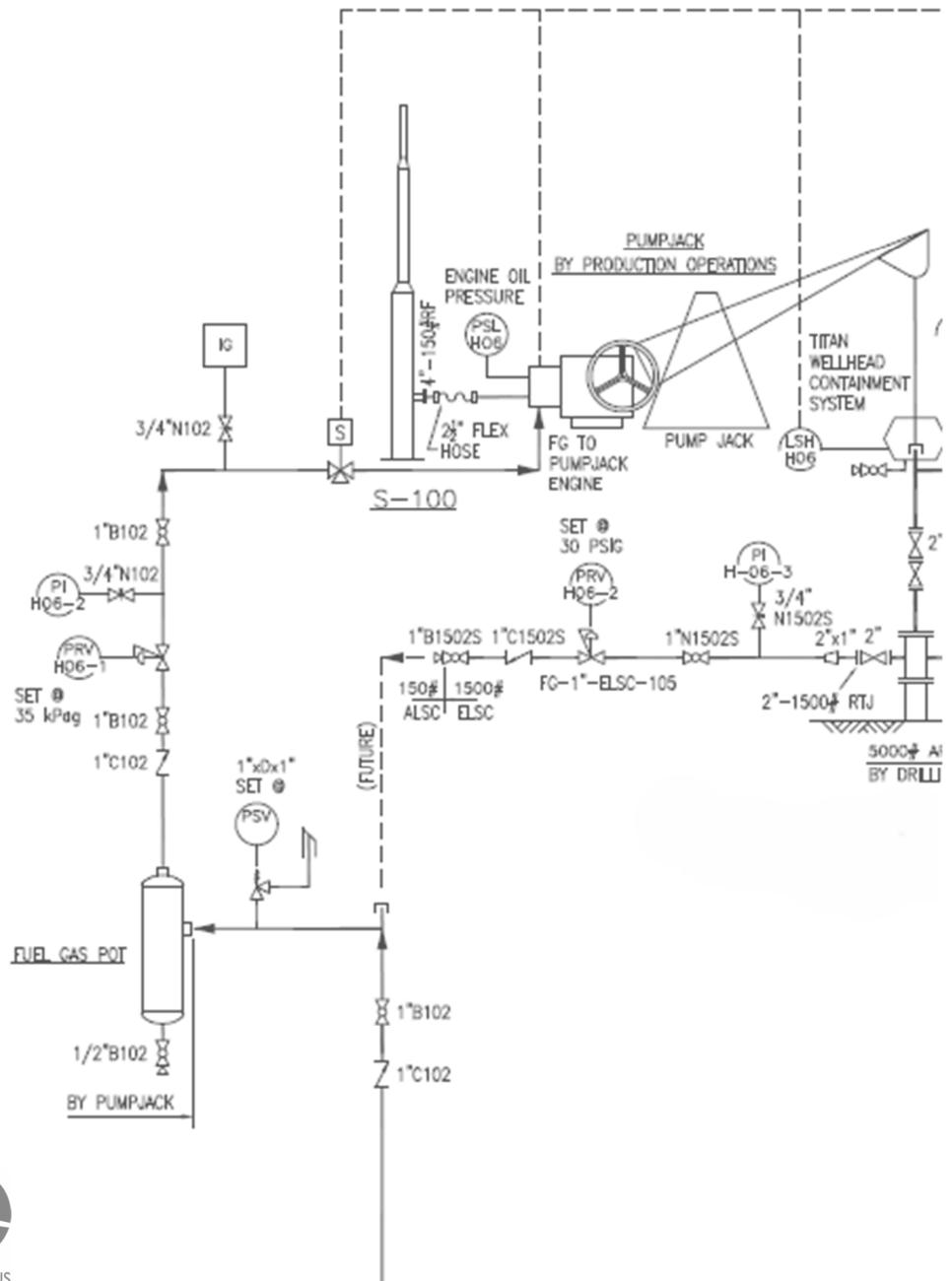


Safety Plan

Guidelines and Interpretation Notes

November 3, 2025

Public Engagement Draft



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1. Introduction

Purpose The *Safety Plan Guidelines and Interpretation Notes* (Guidelines) provide guidance to applicants and operators on the development and maintenance of a Safety Plan.

This introductory section provides information on:

- Updates made to the Guidelines.
- Objectives of the Guidelines.
- Legislative requirements for Safety Plans.
- Application of the Guidelines.
- Use of plain language.

Updates These Guidelines were originally issued in November 2018. They are updated as shown in Table 1.

Table 1: Updates to the Safety Plan Guidelines

Updates	Affected Sections*
Remove references to offshore operations	Purpose and scope Content of the Safety Plan – general; structure, facilities, equipment and systems; awareness, competence and training; and ice management
Clarify relationship to management systems and associated requirements	Management system linkages
Remove references to Contingency Plan requirements, as these are addressed in the <i>Contingency Plan Guidelines and Interpretation Notes</i>	Content of the Safety Plan – emergency preparedness and response
Remove references to subjects not contained in section 8 of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR).	Content of the Safety Plan – awareness, competence and training Reporting incidents and near misses
Reflect OROGO's current standards for format and language.	All

* Section titles are from the 2018 version of the Guidelines.

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Objectives

The objectives of these Guidelines are to:

- Ensure operators take steps to reduce risk to a level that is as low as reasonably practicable.
- Support compliance with the OGDPR.
- Reflect the context of oil and gas activities in the Regulator's jurisdiction.
- Be consistent with the requirements of other western Canada regulators, where possible.

The Guidelines set out the minimum requirements for the content of Safety Plans. Applicants may provide additional or different content, where that content is demonstrated to meet or exceed the same requirements for the protection of human safety.

Legislative requirements

The OGDPR sets the legislative requirements for Safety Plans:

- Section 6(c) states an application for an Authorization must include a Safety Plan.
- Section 8 describes the required contents of a Safety Plan.
- Sections 77 and 80 describe operators' record-keeping responsibilities, including safety-related records.

Section 12 of the *Oil and Gas Operations Act* (OGOA) requires the Regulator to consult with the Chief Safety Officer on the safety of the proposed operations before issuing an Authorization. The Safety Plan submitted by the applicant is a key factor in this discussion.

Important: Where a conflict exists between the Guidelines and the OGDPR, the OGDPR are paramount.

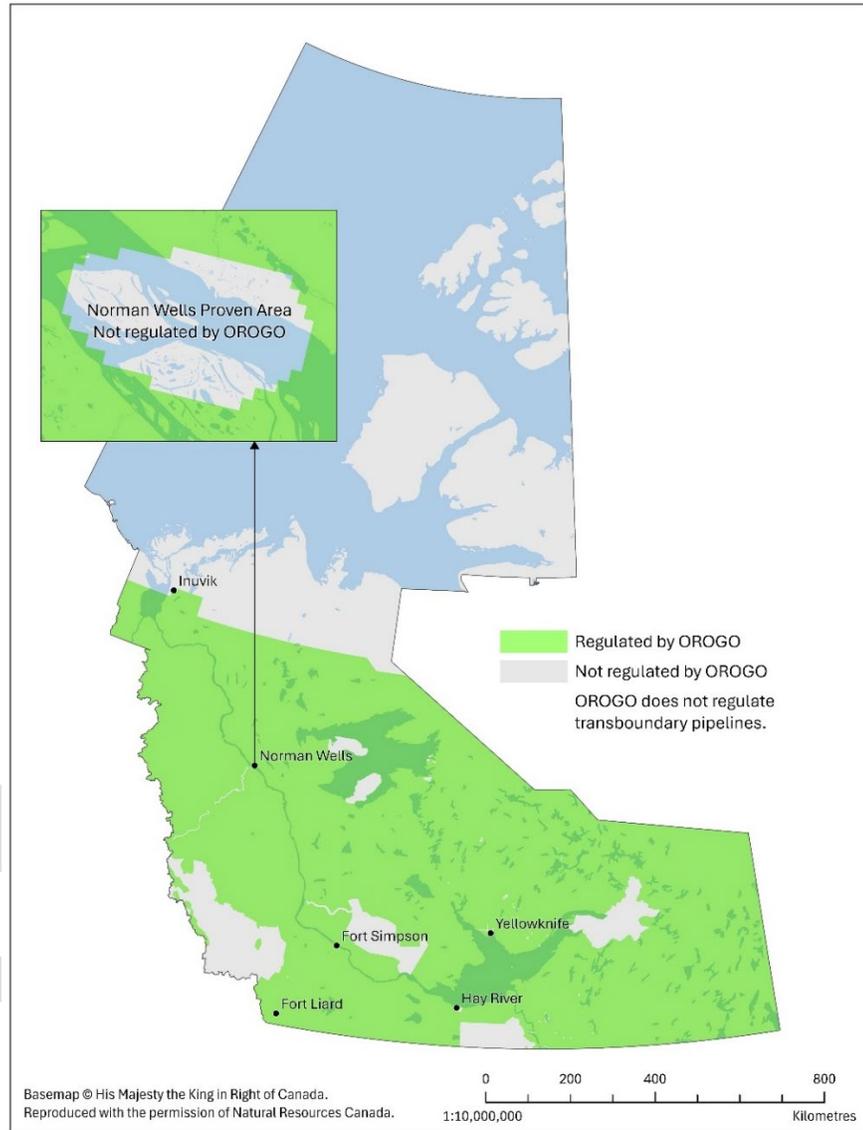
Application

Application of these Guidelines is subject to the Regulator's discretion under OGOA.

These Guidelines apply in the Regulator's jurisdiction, shown in Figure 1.

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Figure 1: Map of the Regulator's Jurisdiction



Plain language

These Guidelines have been written for use by applicants and operators. Plain language is used as much as possible for clarity and accessibility.

2. Purpose and Scope of a Safety Plan

Contents	<p>This section provides information on the purpose and scope of a Safety Plan:</p> <ul style="list-style-type: none">• Purpose of a Safety Plan.• Ownership of a Safety Plan.• Scope of a Safety Plan:<ul style="list-style-type: none">○ Operational complexity.○ Type of operation.○ Operational boundaries.• Application to all personnel.
Purpose of a Safety Plan	<p>A Safety Plan is a reference document for operators, contractors, service personnel, and others involved in the operation. It:</p> <ul style="list-style-type: none">• Describes the processes in place to support safe operations.• Documents the responsibilities and expectations for safety associated with the proposed operations.
Ownership of a Safety Plan	<p>The applicant is responsible for:</p> <ul style="list-style-type: none">• Developing and maintaining a Safety Plan.• Ensuring the comprehensive implementation of a Safety Plan during the proposed operations.
Reflecting operational complexity	<p>A Safety Plan must reflect the complexity of the proposed operations and the associated risk. Safety Plans for low-risk operations will be shorter and less involved than Safety Plans for high-risk operations.</p>
Reflecting the type of operation	<p>A Safety Plan must reflect the type of proposed operations:</p> <ul style="list-style-type: none">• The works or activities before, during, and after the operations.• The equipment used.• The duration.
Reflecting operational boundaries	<p>A Safety Plan must reflect the planned operational boundaries:</p> <ul style="list-style-type: none">• The location.• Site access.• The time of year.• The proposed working hours (for example, 24-hour operations).
Application to all personnel	<p>A Safety Plan applies to all personnel active as part of the operation, including:</p> <ul style="list-style-type: none">• The operator and its direct employees.• Contractors.• Service providers.

3. Required Contents of a Safety Plan

Contents

This section provides information on the required contents of a Safety Plan:

- Overall contents.
- Management system references.
- Identifying hazards and risks.
- Safety-critical infrastructure.
- Organizational structure and contacts.
- Compliance monitoring and performance measurement.
- Safety-related records.

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3.1. Overall contents

Contents	<p>This section provides information on the overall contents of a Safety Plan:</p> <ul style="list-style-type: none">• Adopted codes and standards.• Commitments by the applicant.• Worker participation.• Consistency with other requirements.• Referring to other documents.
Adopted codes and standards	<p>A Safety Plan should list industry guidance and other codes and standards the applicant has adopted related to the proposed operations (for example, Energy Safety Canada industry recommended practices).</p> <p>Where an applicant adopts a code or standard as part of the Safety Plan, OROGO will enforce compliance with that code or standard.</p>
Commitments by the applicant	<p>A Safety Plan should reference and respond to commitments the applicant made in other documents associated with the proposed operations. This may include, but is not limited to, commitments made in:</p> <ul style="list-style-type: none">• A Development Plan submitted under section 14 of the <i>Oil and Gas Operations Act</i>.• The Contingency Plan submitted with the application for an Authorization.
Worker participation	<p>A Safety Plan should describe how workers:</p> <ul style="list-style-type: none">• Participate in the development, implementation, and continuous improvement of the Safety Plan.• Engage in safety management activities, such as the worker's right to know, right to participate, and right to refuse.
Consistency with other requirements	<p>A Safety Plan is one of three plans required by the <i>Oil and Gas Drilling and Production Regulations</i>. The Safety Plan, Environmental Protection Plan, and Contingency Plan should be mutually consistent and supportive.</p> <p>A Safety Plan must reflect and be consistent with the laws of the Northwest Territories, including the <i>Safety Act</i> and the <i>Oil and Gas Safety Regulations</i>.</p>
Referring to other documents	<p>A Safety Plan may refer to other documents (for example, specific work procedures or operating manuals). The applicant does not need to submit these documents with the Safety Plan. However, OROGO may request a copy of any document referred to in the Safety Plan at any time.</p>

3.2. Management system references

Contents	<p>This section provides information on references to the applicant's management systems in a Safety Plan:</p> <ul style="list-style-type: none">• Management system requirements.• Safety Plan requirements.• Management system verification.
Management system requirements	<p>Section 5 of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) requires operators to have a management system. The management system must integrate operations, technical systems, financial management, and human resources management to ensure the operation complies with the <i>Oil and Gas Operations Act</i> (OGOA) and the OGDPR.</p> <p>The management system includes several components directly related to safety and the Safety Plan:</p> <ul style="list-style-type: none">• Setting safety improvement goals.• Identifying hazards and evaluating and managing associated risks.• Ensuring personnel are trained and competent.• Ensuring the integrity of safety-critical facilities and equipment.• Continuous improvement, including:<ul style="list-style-type: none">○ Internal reporting and review of hazards, incidents, and near-misses.○ Periodic auditing and reviewing of the system.○ Incorporating corrective actions based on experience.• System documentation and document control.
Safety Plan requirements	<p>A Safety Plan must:</p> <ul style="list-style-type: none">• Demonstrate how the applicant's management system will apply to the proposed operations.• Include summaries of the relevant components of the management system.
Management system verification	<p>The OGDPR does not require the applicant to submit its management system when applying for an Authorization. However, OROGO may:</p> <ul style="list-style-type: none">• Issue Information Requests to clarify the application of the management system to the safety of the proposed operations.• Audit the management system to ensure it meets the requirements of the OGDPR.• Require the operator to conduct periodic third-party audits of its management system to ensure it meets the requirements of the OGDPR.

3.3. Identifying hazards and risks

Contents	<p>This section provides information on identifying hazards and risks in a Safety Plan:</p> <ul style="list-style-type: none">• Safety Plan requirements.• As low as reasonably practicable.
Safety Plan requirements	<p>A Safety Plan must:</p> <ul style="list-style-type: none">• List studies carried out to identify hazards associated with the proposed operations.• Summarize the results of these studies by:<ul style="list-style-type: none">○ Listing the hazards that were identified.○ Describing the results of the risk evaluation.• Describe the measures the operator will put in place to reduce the risk of operations to as low as reasonably practicable (ALARP) including:<ul style="list-style-type: none">○ Listing and summarizing key operations and safety procedures (for example, safety procedures associated with helicopter operations).○ Identifying and summarizing processes to control and coordinate hazardous work (for example, work permit systems or shift hand-over procedures).○ Identifying routine hazard control measures (for example, site inspections or storage of hazardous materials).○ Referencing processes that describe how operational procedures are developed, monitored, controlled, and maintained.
As low as reasonably practicable (ALARP)	<p>OROGO expects operators to reduce the risk of operations to ALARP.</p> <p>An applicant may demonstrate that the risk reduction and mitigation measures included in its Safety Plan reduce the risk to ALARP through:</p> <ul style="list-style-type: none">• Qualitative analysis.• Quantitative analysis.• Incorporating relevant industry best practices, codes, and standards.

3.4. Safety-critical infrastructure

Contents	<p>This section provides information on safety-critical infrastructure in a Safety Plan:</p> <ul style="list-style-type: none">• Safety Plan requirements.• Certification of equipment.• Canadian Association of Energy Contractors (CAOEC) compliance.
Safety Plan requirements	<p>A Safety Plan must:</p> <ul style="list-style-type: none">• List all safety-critical structures, facilities, equipment, and systems.• Describe the system for inspecting, testing, and maintaining this equipment.
Certification of equipment	<p>All safety-critical infrastructure must be certified. Current inspection certificates for all safety-critical structures, facilities, and equipment listed in the Safety Plan must be available on site for review by OROGO Inspectors.</p>
CAOEC compliance	<p>Operators must maintain compliance with the current editions of the following CAOEC Recommended Practices:</p> <ul style="list-style-type: none">• Recommended Practice 3.0: Inspection and Certification of Masts.• Recommended Practice 4.0: Inspection and Certification of Overhead Equipment.• Recommended Practice 6.0: Inspection and Certification of Blowout Preventers.• Recommended Practice 10.0: Inspection of Drawworks Brake Load Path Components.• Recommended Practice 11.0: Inspection and Certification of Carrier Mounted Equipment.

3.5. Organizational structure and contacts

Contents

This section provides information on organizational structure and contacts in a Safety Plan:

- Safety Plan requirements.
- Contractors and service providers.

Safety Plan requirements

A Safety Plan must:

- Describe the applicant's organizational structure, showing how it will maintain oversight of and responsibility for the safety of the proposed operations at the corporate level.
- Describe the on-site organizational structure, showing who will maintain oversight of and responsibility for the safety of the proposed operations in the field.
- Explain the relationship between the applicant's corporate organizational structure and the on-site organizational structure.
- Provide the name, position title, and contact information for:
 - The individual accountable for the development, maintenance, monitoring, and continuous improvement of the Safety Plan.
 - The individual responsible for implementing the Safety Plan during the proposed operations.

Contractors and service providers

A Safety Plan must include a description of:

- The relationship between the applicant and any contractors or service providers involved in the proposed operations.
- How the applicant will maintain oversight and coordination of activities carried out by contractors or service providers, including implementation of the Safety Plan.

3.6. Compliance monitoring and performance measurement

Safety Plan requirements

A Safety Plan must:

- Describe how compliance with the plan will be monitored.
- Describe how the plan's performance will be measured in relation to its objectives.
- Identify and describe the sources of information that will be used to assess compliance and performance (for example, audits or near-miss reporting).
- Describe how non-conformities will be managed.

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3.7. Safety-related records

Contents	<p>This section provides information on maintaining safety-related records in a Safety Plan:</p> <ul style="list-style-type: none">• Mandatory record keeping.• Safety Plan requirements.• Accessibility for inspection.
Mandatory record keeping	<p>The <i>Oil and Gas Drilling and Production Regulations</i> require the operator to maintain records related to safety and the implementation of the Safety Plan, including records of:</p> <ul style="list-style-type: none">• Emergency drills and exercises.• Incidents and near-misses.• The quantities of consumable substances required to ensure safe operations.• Safety-critical daily maintenance and operating activities.• The status of safety-critical equipment and systems.
Safety Plan requirements	<p>A Safety Plan must:</p> <ul style="list-style-type: none">• Identify the records the operator will maintain to demonstrate compliance with the Safety Plan.• Describe the process for reviewing and updating the Safety Plan.• Include processes for communicating updates to the Safety Plan to employees, contractors, and service providers.
Accessibility for inspection	<p>The operator must ensure all records, including safety-related records, are readily accessible to OROGO Inspectors.</p>

4. Submitting a Safety Plan

Contents	<p>This section provides information on submitting a Safety Plan:</p> <ul style="list-style-type: none">• When to submit a Safety Plan.• Submitting joint safety, health, and environmental protection plans.• What format to use.
When to submit a Safety Plan	<p>An applicant must submit a Safety Plan as part of the application package for an Authorization from the Regulator.</p> <p>An operator must submit annual updates to its Safety Plan, as described in section 5 of these Guidelines.</p>
Submitting joint plans	<p>An applicant may submit a joint safety, health, and environmental protection plan in place of a separate Safety Plan.</p> <p>If an applicant submits a joint safety, health, and environmental protection plan, it must include a separate concordance table showing where each item required under section 3 of these Guidelines is found in the submitted document.</p> <p>Important: OROGO will not accept joint safety, health, and environmental protection plans submitted without a concordance table.</p>
Format	<p>A Safety Plan must be submitted as a PDF document.</p>

5. Maintaining and Updating a Safety Plan

- Contents** This section provides information on the operator's obligation to maintain and update the Safety Plan:
- Annual reviews.
 - Version control.
- Annual reviews** An operator must review its Safety Plan annually if an operation lasts more than one year.
- If the annual review results in no changes to the Safety Plan, the operator must communicate to OROGO, in writing, that the review has been completed and no changes are required.
- If the annual review results in changes to the Safety Plan, the operator must submit a PDF copy of the complete, updated Safety Plan to OROGO for review and approval, along with a cover letter identifying the sections where changes have been made.
- Version control** An operator must maintain version control of its Safety Plan. Any Safety Plan or updates to the Safety Plan submitted to OROGO must be labeled with a version number and a date of issuance.

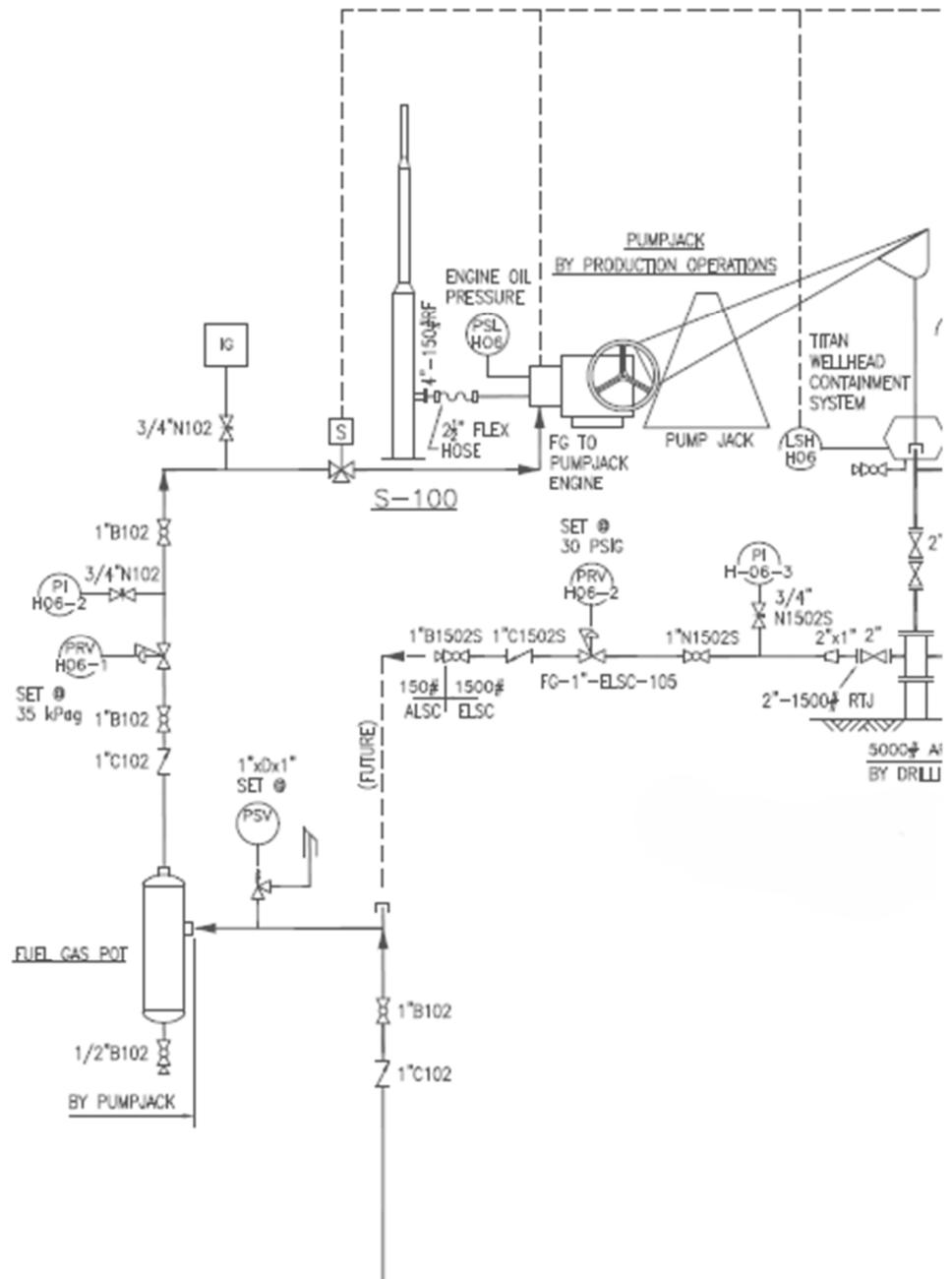
6. Regulator's Approval

These *Safety Plan Guidelines and Interpretation Notes* are issued under section 18 of the *Oil and Gas Operations Act* effective MONTH DAY, YEAR.

They replace the *Safety Plan Guidelines and Interpretation Notes* approved by the Regulator on November 20, 2018.

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Regulator

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