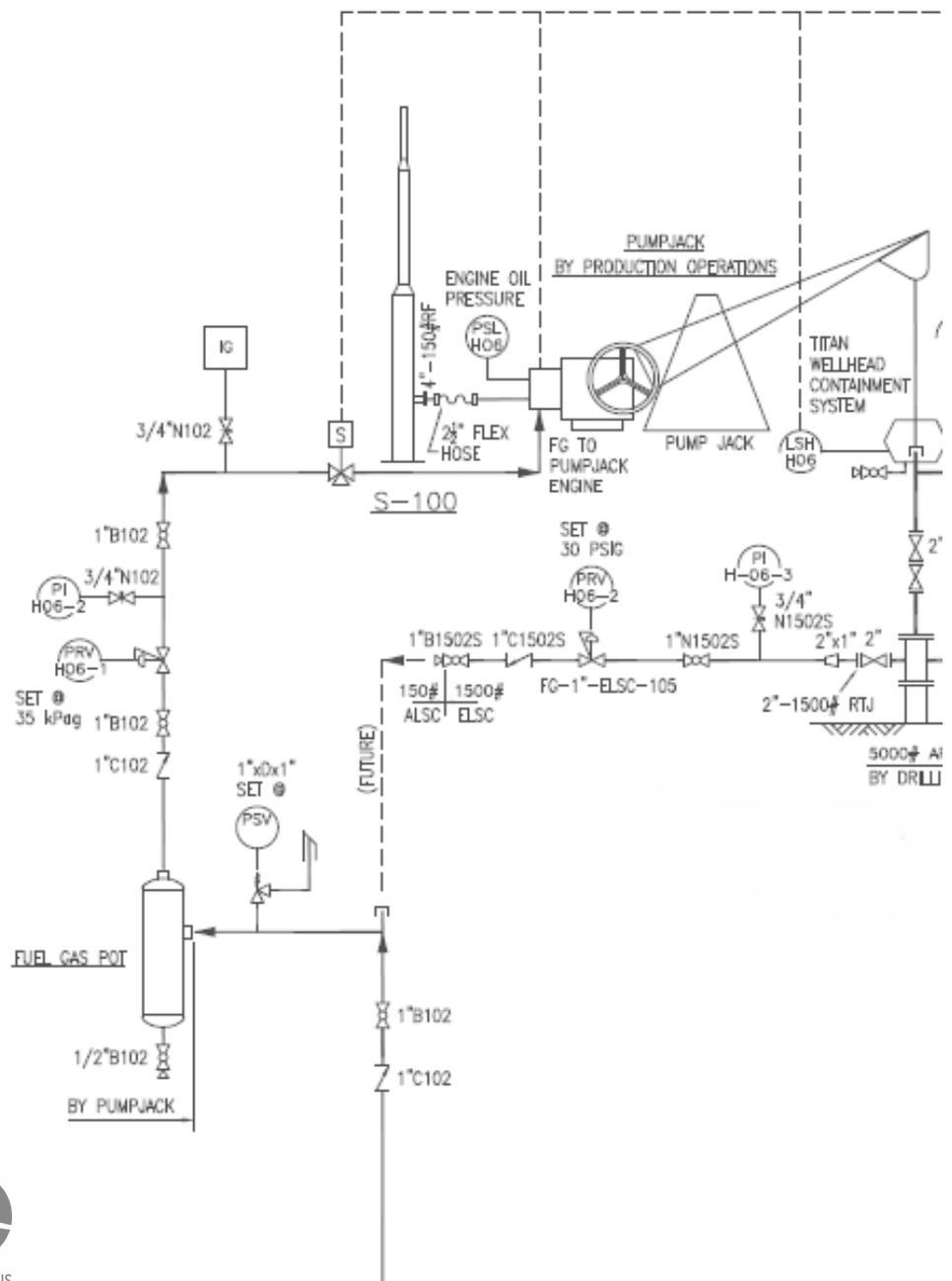


Environmental Protection Plan

Guidelines and Interpretation Notes

March 13, 2026

Public Engagement Draft



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1. Introduction

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

This introductory section provides information on:

- Updates made to the Guidelines.
- Objectives of the Guidelines.
- Legislative requirements for Environmental Protection 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 Environment Protection Plan Guidelines

Updates	Affected Sections*
Removed references to offshore operations	Purpose and scope Content of the Environmental Protection Plan – general; structure, facilities, equipment and systems; awareness, competence and training; and ice management
Removed references to Contingency Plan requirements, as these are addressed in the <i>Contingency Plan Guidelines and Interpretation Notes</i>	Content of the Environmental Protection Plan – emergency preparedness and response
Remove references to subjects not contained in section 9 of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR)	Content of the Environmental Protection Plan – awareness, competence and training Reporting incidents and near misses
Clarified the relationship to management systems and associated requirements	Management System Linkages Content of the Environmental Protection Plan
Added annual Environmental Protection Plan review requirements for operations lasting more than one year	Not applicable (new section)

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Updates	Affected Sections*
Added references to the Canadian Association of Energy Contractors (CAOEC) requirements, consistent with the <i>Service Rig Operation Safety Guidelines and Interpretation Notes</i>	Content of the Environmental Protection Plan – structures, facilities, equipment and systems
Added resources for the selection, evaluation, and use of chemical substances	Content of the Environmental Protection Plan – selection, evaluation and use of chemical substances
Reflected OROGO's current standards for format and language.	All

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

Objectives

The objectives of these Guidelines are to:

- Ensure that operators demonstrate the use of best practices in environmental protection.
- 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 Environmental Protection Plans. Applicants may provide additional or different content, where that content is demonstrated to meet or exceed the same requirements for the protection of the environment.

Legislative requirements

The OGDPR sets the legislative requirements for Environmental Protection Plans:

- Section 6(d) states an application for an Authorization must include an Environmental Protection Plan.
- Section 9 describes the required contents of an Environmental Protection Plan.
- Sections 77 and 80 describe operators' record-keeping responsibilities, including records related to environmental protection.

The OGDPR also sets the legislative requirements for management systems, which affect the contents of Environmental Protection Plans:

- Section 5 describes the required contents of a management system.
- Section 18 requires operators to comply with their management systems.

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- Sections 19(i) and (j) describe operators' obligations related to infrastructure critical to environmental protection during operations.

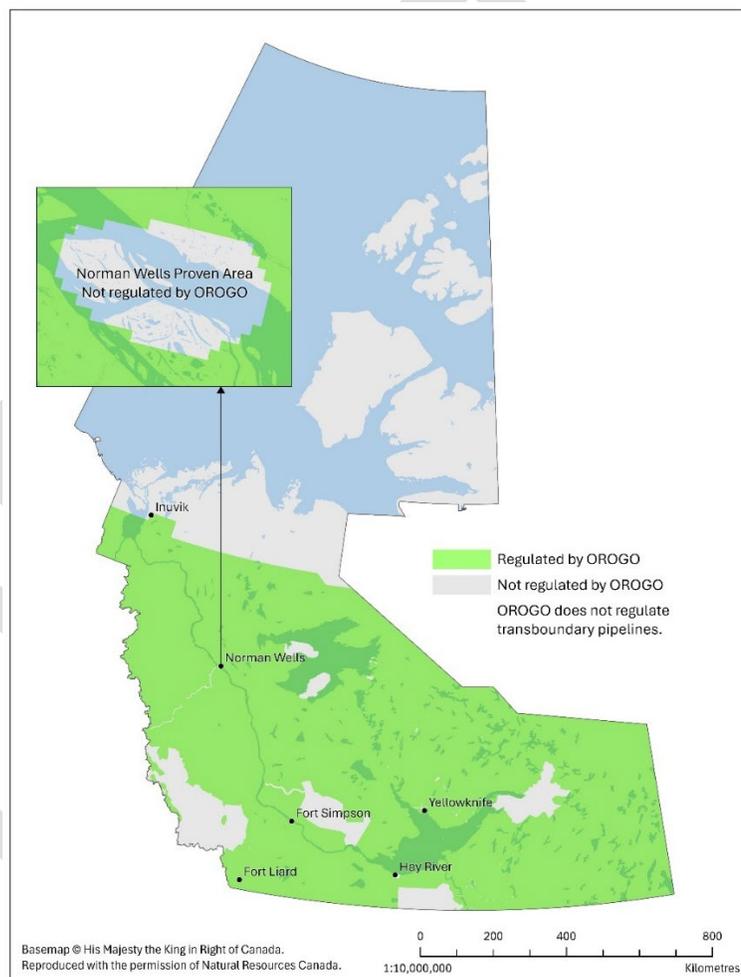
Important: Where a conflict exists between the Guidelines and the OGDPR, the OGDPR are paramount.

Application

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

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

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 an Environmental Protection Plan

Contents	<p>This section provides information on the purpose and scope of an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Purpose of an Environmental Protection Plan.• Ownership of an Environmental Protection Plan.• Scope of an Environmental Protection Plan:<ul style="list-style-type: none">○ Operational complexity.○ Type of operation.○ Operational boundaries.• Application to all personnel.
Purpose of an Environmental Protection Plan	<p>An Environmental Protection 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 protect the environment during operations.• Documents the responsibilities and expectations for environmental protection associated with the operation.
Ownership of an Environmental Protection Plan	<p>The applicant is responsible for:</p> <ul style="list-style-type: none">• Developing and maintaining the Environmental Protection Plan.• Ensuring the comprehensive implementation of the Environmental Protection Plan during the operation.
Reflecting the operational complexity	<p>The Environmental Protection Plan must reflect the complexity of the proposed operations and the associated risk. Environmental Protection Plans for low-risk operations will be shorter and less involved than Environmental Protection Plans for high-risk operations.</p>
Reflecting the type of operation	<p>The Environmental Protection 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>The Environmental Protection Plan must reflect the planned operational boundaries:</p> <ul style="list-style-type: none">• The location.• Site access.• The time of year.

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Application to all personnel

The Environmental Protection Plan applies to all personnel active as part of the operation, including:

- The operator and its direct employees.
- Contractors.
- Service providers.

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3. Minimizing Regulatory Duplication

Requirement

To avoid duplication of effort and reduce potential miscommunication, applicants **must submit** the same Environmental Protection Plan to OROGO that they submit to the Land and Water Boards of the Mackenzie Valley or other regulator with authority over the proposed operations.

Changes to the Environmental Protection Plan submitted to another regulator must also be submitted to OROGO for review and approval.

4. Required Contents of an Environmental Protection Plan

Contents

This section provides information on the required contents of an Environmental Protection Plan:

- 4.1 Overall contents.
- 4.2 Management system references.
- 4.3 Identifying hazards and risks.
- 4.4 Infrastructure critical to environmental protection.
- 4.5 Organizational structure and contacts.
- 4.6 Chemical substances.
- 4.7 Waste materials.
- 4.8 Discharges into the environment.
- 4.9 Compliance monitoring and performance measurement.
- 4.10 Records related to environmental protection.

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4.1. Overall contents

Contents	<p>This section provides information on the general contents of an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Adopted codes and standards.• Commitments by the applicant.• Integration with other requirements.• Referring to other documents.
Adopted codes and standards	<p>An Environmental Protection Plan should list industry guidance and other codes and standards that the applicant has adopted related to the work or activity (for example, industry recommended practices).</p> <p>Where an applicant adopts a code or standard as part of the Environmental Protection Plan, OROGO will enforce compliance with that code or standard.</p>
Commitments by the operator	<p>An Environmental Protection Plan should reference and be responsive 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 under section 14 of the <i>Oil and Gas Operations Act</i>.• The Contingency Plan submitted with the application for an Authorization. <p>An Environmental Protection Plan should also reference and be responsive to commitments the applicant made as part of any processes under the <i>Mackenzie Valley Resource Management Act</i> (MVRMA) associated with the proposed operations.</p>
Integration with other requirements	<p>An Environmental Protection Plan is one of three plans required by the <i>Oil and Gas Drilling and Production Regulations</i>. The Environmental Protection Plan, Safety Plan, and Contingency Plan should be mutually consistent and supportive.</p> <p>An Environmental Protection Plan must reflect and be consistent with the laws of the Northwest Territories, such as the <i>Environmental Protection Act</i>, the <i>Waters Act</i>, and the <i>Environmental Rights Act</i>. It must also be consistent with the requirements of the MVRMA.</p>
Referring to other documents	<p>An Environmental Protection 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 Environmental Protection Plan. However, OROGO may request a copy of any document referred to in the Environmental Protection Plan at any time.</p>

4.2. Management system references

Contents	<p>This section provides information on references to the applicant's management systems in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan requirements.• Management system requirements.• Management system compliance.• Management system verification.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must:</p> <ul style="list-style-type: none">• Include summaries of the relevant components of the management system.• Demonstrate how the applicant's management system will apply to the proposed operations. <p>Where appropriate, these Guidelines highlight Environmental Protection Plan components which relate directly to management system requirements.</p>
Management system requirements	<p>Section 5 of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) requires applicants and 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> and the OGDPR.</p> <p>The management system must include several components directly related to environmental protection and the Environmental Protection Plan:</p> <ul style="list-style-type: none">• Setting goals for improving environmental protection.• Identifying hazards and evaluating and managing associated risks.• Ensuring personnel are trained and competent.• Ensuring and maintaining the integrity of facilities and equipment critical to environmental protection.• 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.
Management system compliance	<p>The operator must ensure compliance with the management system, including with those aspects reflected in the Environmental Protection Plan.</p>

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**Management
system
verification**

The OGDPR does not require the applicant to submit its management system when applying for an Authorization. However, OROGO may:

- Issue Information Requests to clarify the application of the management system to the protection of the environment during 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.

4.3. Identifying hazards and risks

Contents

This section provides information on identifying hazards and risks in an Environmental Protection Plan:

- Environmental Protection Plan requirements.
- Management system connection.
- As low as reasonably practicable.

Environmental Protection Plan requirements

An Environmental Protection Plan must:

- List studies carried out to identify hazards associated with the proposed operations.
- Summarize the results of these studies by:
 - 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 identified environmental risks to as low as reasonably practicable (ALARP) including:
 - Listing and summarizing key operations and procedures for protecting the environment (for example, procedures associated with the collection and storage of drilling waste).
 - Identifying and summarizing processes to control and coordinate work with a high potential for damage to the environment (for example, drilling operations, waste fluid management, trenching or excavating, waste transport and disposal, working near water bodies).
 - 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.

Management system connection

The management system must include processes for identifying hazards and for evaluating and managing risks associated with those hazards.

As low as reasonably practicable (ALARP)

OROGO expects operators to reduce the risk of operations to ALARP.

An applicant may demonstrate that the risk reduction and mitigation measures included in its Environmental Protection Plan reduce the risk to ALARP through:

- Qualitative analysis.
- Quantitative analysis.
- Incorporating relevant industry best practices, codes, and standards.

4.4. Infrastructure critical to environmental protection

Contents	<p>This section provides information on infrastructure critical to environmental protection in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan requirements.• Management system connection.• Requirements during operations.• Certification of equipment.• CAOEC compliance.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must:</p> <ul style="list-style-type: none">• List all structures, facilities, equipment, and systems critical to environmental protection.• Describe the system for inspecting, testing, and maintaining this equipment.
Management system connection	<p>The management system must include processes for ensuring and maintaining the integrity of infrastructure critical to environmental protection.</p>
Requirements during operations	<p>During operations, the operator must ensure:</p> <ul style="list-style-type: none">• All infrastructure critical to environmental protection is available and fully operational.• The list of infrastructure critical to environmental protection in the Environmental Protection Plan is updated after any:<ul style="list-style-type: none">○ Significant change to the equipment.○ Repair to any major component of the equipment.
Certification of equipment	<p>All infrastructure critical to environmental protection must be certified. Current inspection certificates for all structures, facilities, and equipment critical to environmental protection listed in the Environmental Protection Plan must be available on site for review during an inspection.</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.

4.5. Organizational structure and contacts

Contents	<p>This section provides information on organizational structure and contacts in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan requirements.• Management system connection.• Contractors and service providers.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must:</p> <ul style="list-style-type: none">• Describe the applicant's organizational structure, showing how it will maintain oversight of and responsibility for environmental protection during the proposed operations at the corporate level.• Describe the on-site organizational structure, showing who will maintain oversight of and responsibility for environmental protection during 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:<ul style="list-style-type: none">○ The individual accountable for the development, maintenance, monitoring, and continuous improvement of the Environmental Protection Plan.○ The individual responsible for implementing the Environmental Protection Plan during the proposed operations.
Management system connection	<p>The management system must include the arrangements for coordinating the proposed operation among the operator, contractors, owners of the installation, and others participating in the work or activity.</p>
Contractors and service providers	<p>An Environmental Protection Plan must include a description of:</p> <ul style="list-style-type: none">• 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 Environmental Protection Plan.

4.6. Chemical substances

Contents

This section provides information on chemical substances used during the operation in an Environmental Protection Plan:

- Environmental Protection Plan Requirements.
- Resources for selecting, evaluating, and using chemical substances.

Definition: chemical substances

Chemical substances include drilling fluid ingredients and process chemicals.

Environmental Protection Plan requirements

An Environmental Protection Plan must describe:

- The processes for selecting, evaluating, and using chemical substances during the proposed operation.
- All chemical substances that will be used, stored, handled, or disposed of during the activity.
- Procedures for the safe handling, storage, and use of those chemical substances.
- Measures to prevent the release of chemical substances into the environment.
- Methods for the proper disposal of chemical substances and chemical waste.

Evaluations, assessments, and mitigations must reflect the overall process for hazard identification and mitigation described in section 4.3 of these guidelines.

Resources for selecting, evaluating, and using chemical substances

The following resources may be used for selecting, evaluating, and using chemical substances during the proposed operation:

- [Canadian Domestic Substances List](#)
- [Canadian Environmental Protection Act - Toxic Substances](#)
- [Biological Test Method: Toxicity Using Luminescent Bacteria](#)
- [CEFAS – Hazard Assessment Process](#)

Important: Applicants relying on other resources to select, evaluate, and use chemical substances must include a rationale for that choice in the Environmental Protection Plan. The applicant does not need to submit these documents or lists with the Environmental Protection Plan, but they must be referenced. OROGO may request a copy of any document referred to in the Environmental Protection Plan at any time.

4.7. Waste materials

Contents

This section provides information on waste materials in an Environmental Protection Plan:

- Environmental Protection Plan Requirements.
- Compliance with other requirements.

Environmental Protection Plan requirements

An Environmental Protection Plan must describe the equipment and procedures for the treatment, handling, and disposal of waste materials, including procedures for:

- Temporary storage and management of waste.
- Classifying and separating waste streams.
- Handling, storing, and transporting waste material to its final disposal location.

Compliance with other requirements

The procedures for handling, storing, and transporting waste materials in the Environmental Protection Plan must comply with:

- The Government of the Northwest Territories [Guideline for Hazardous Waste Management](#), including storage, transportation, and disposal.
- [Federal requirements](#) for the transboundary transportation of hazardous waste (for example, to facilities in Alberta or British Columbia).

4.8. Discharges into the environment

Contents	<p>This section provides information on discharges into the environment in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan Requirements.• Compliance with other requirements.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must describe all discharges into the natural environment, including:</p> <ul style="list-style-type: none">• A description of all planned discharge streams.• Limits for any discharges and the guidance, standards, or legislation used to establish those limits.• The system for monitoring compliance with the discharge limits (for example, the sampling and analytical programs to be followed).
Definition: discharges	<p>Discharges into the natural environment include waste materials.</p>
Compliance with other requirements	<p>The procedures for handling, storing, and transporting waste materials in the Environmental Protection Plan must comply with the <i>Spill Contingency Planning and Reporting Regulations</i>.</p> <p>Important: The reportable quantities identified in Schedule B of the <i>Spill Contingency Planning and Reporting Regulations</i> to not apply to discharges from activities regulated under the <i>Oil and Gas Operations Act</i>.</p>

4.9. Compliance monitoring and performance measurement

Contents	<p>This section provides information on compliance monitoring and performance measurement in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan requirements.• Management system connection.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must:</p> <ul style="list-style-type: none">• 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.
Management system connection	<p>The management system must include processes for:</p> <ul style="list-style-type: none">• Internal reporting of hazards, incidents, and near-misses.• Periodic audits or reviews of the system.• Incorporating corrective actions in response to non-conformance or opportunities for improvement.

4.10. Records related to environmental protection

Contents	<p>This section provides information on maintaining safety-related records in an Environmental Protection Plan:</p> <ul style="list-style-type: none">• Environmental Protection Plan requirements.• Management system connection.• Mandatory record keeping.• Accessibility for inspection.
Environmental Protection Plan requirements	<p>An Environmental Protection Plan must:</p> <ul style="list-style-type: none">• Identify the records the operator will maintain to demonstrate compliance with the Environmental Protection Plan.• Describe the process for reviewing and updating the Environmental Protection Plan.• Include processes for communicating updates to the Environmental Protection Plan to employees, contractors, and service providers.
Management system connection	<p>The management system must include processes for:</p> <ul style="list-style-type: none">• Internal reporting of hazards, incidents, and near-misses.• Incorporating corrective actions in response to non-conformance or opportunities for improvement.• Ensuring documents associated with the system are current, valid, and approved.• Making personnel aware of their roles and responsibilities.
Mandatory record keeping	<p>The <i>Oil and Gas Drilling and Production Regulations</i> require the operator to maintain records related to environmental protection and the implementation of the Environmental Protection Plan, including records of:</p> <ul style="list-style-type: none">• Emergency drills and exercises.• Incidents and near-misses.• Daily maintenance and operating activities critical to environmental protection.• The status of equipment and systems critical to environmental protection.
Accessibility for inspection	<p>The operator must ensure all records, including records related to environmental protection, are readily accessible to OROGO Inspectors.</p>

5. Submitting an Environmental Protection Plan

Contents	<p>This section provides information on submitting an Environmental Protection Plan:</p> <ul style="list-style-type: none">• When to submit an Environmental Protection Plan.• Mandatory concordance table.• Submitting joint safety, health, and environmental protection plans.• What format to use.
When to submit an Environmental Protection Plan	<p>An applicant must submit an Environmental Protection Plan as part of the application package for an Authorization from the Regulator.</p> <p>An operator must submit annual updates to its Environmental Protection Plan, as described in section 6 of these Guidelines.</p>
Mandatory concordance table	<p>An applicant must submit a concordance table with its Environmental Protection Plan, identifying where each item required under section 4 of these Guidelines is found in the submitted document.</p>
Submitting joint plans	<p>An applicant may submit a joint safety, health, and environmental protection plan in place of a separate Environmental Protection Plan.</p>
Format	<p>Environmental Protection Plans must be submitted as PDF documents.</p>

6. Maintaining and Updating an Environmental Protection Plan

Contents	<p>This section provides information on the operator's obligation to maintain and update the Environmental Protection Plan:</p> <ul style="list-style-type: none">• Annual reviews.• Version control.
Annual reviews	<p>If an operation lasts more than one year, the operator must review the Environmental Protection Plan annually.</p> <p>If the annual review results in no changes to the Environmental Protection Plan, the operator must communicate to OROGO, in writing, that the review has been completed and no changes are required.</p> <p>If the annual review results in changes to the Environmental Protection Plan, the operator must submit a PDF copy of the complete, updated Environmental Protection Plan to OROGO for review and approval, along with a cover letter identifying the sections where changes have been made.</p>
Version control	<p>The operator must maintain version control of the Environmental Protection Plan. Any Environmental Protection Plan or updates to the Environmental Protection Plan submitted to OROGO must be labeled with a version number and a date of issuance.</p>

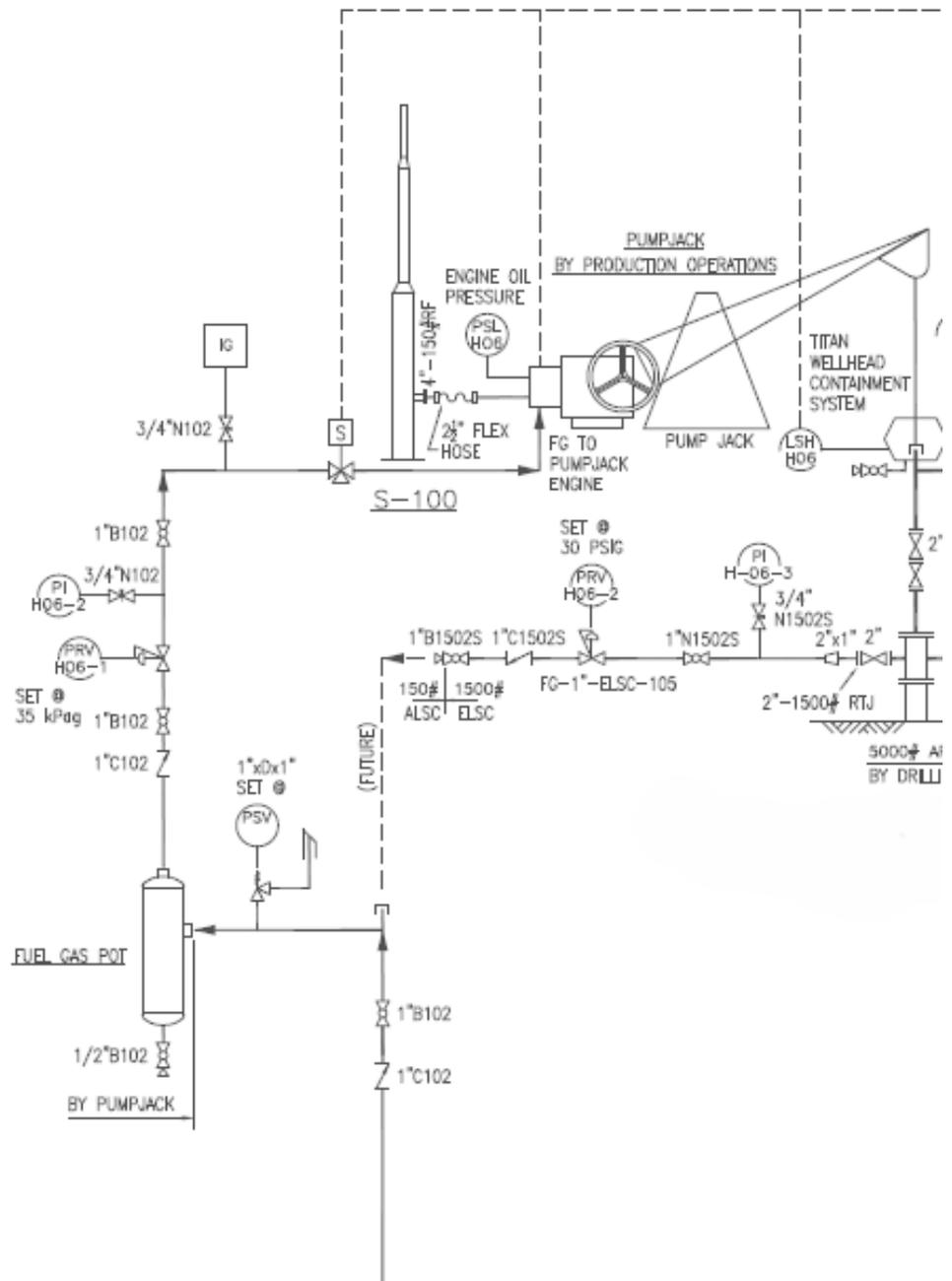
7. Regulator's Approval

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

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

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Regulator

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