



CONTINGENCY PLAN GUIDELINES AND INTERPRETATION NOTES

**OFFICE OF THE REGULATOR OF OIL AND
GAS OPERATIONS**

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Contingency Plan Guidelines and Interpretation Notes

1. INTRODUCTION

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

Legislative Requirements The legislative requirements for Contingency Plans are:

- Section 6(j) of the *Oil and Gas Drilling and Production Regulations* (OGDPR) states that an application for an Operations Authorization (OA) must include Contingency Plans, including emergency response procedures to mitigate the effects of any reasonably foreseeable event that might compromise safety or environmental protection;
- Section 19(e) of the OGDPR requires that all persons at an operation, or in transit to or from an operation, are familiar with safety and evacuation procedures and with their respective roles and responsibilities in the Contingency Plans, including emergency response procedures;
- Section 77 of the OGDPR states that records must be kept of all emergency drills and exercises;
- Section 86(1) of the OGDPR requires that operators include a description of Contingency Plan exercises in environmental reports required for a production project; and
- Section 86(2) of the OGDPR requires that operators include a description of Contingency Plan exercises in environmental reports required for an exploration or delineation well.

Minimum Requirements The Guidelines set out the minimum requirements for the content of Contingency 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 and the environment.

Legislation is Paramount Where a conflict exists between the Guidelines and the OGDPR, the OGDPR are paramount.

Objectives The objectives of the Guidelines are to:

- Clarify information requirements for Contingency Plans submitted to the Regulator;
Assist in the submission of complete Contingency Plans to enhance the efficiency of the application process;

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- Ensure that operators understand the purpose and scope of Contingency Plans submitted to the Regulator; and
- Promote accessibility and transparency in oil and gas regulation.

Regulator's Approval Required

Contingency Plans are used to consider the emergency response procedures for the work or activity before an Operations Authorization is issued (as required under section 12 of the *Oil and Gas Operations Act* (OGOA)).

Contingency Plans are reviewed by the Regulator during the process of reviewing an application for an Operations Authorization. An approved Contingency Plan is required before the Regulator can issue an Operations Authorization.

Authority

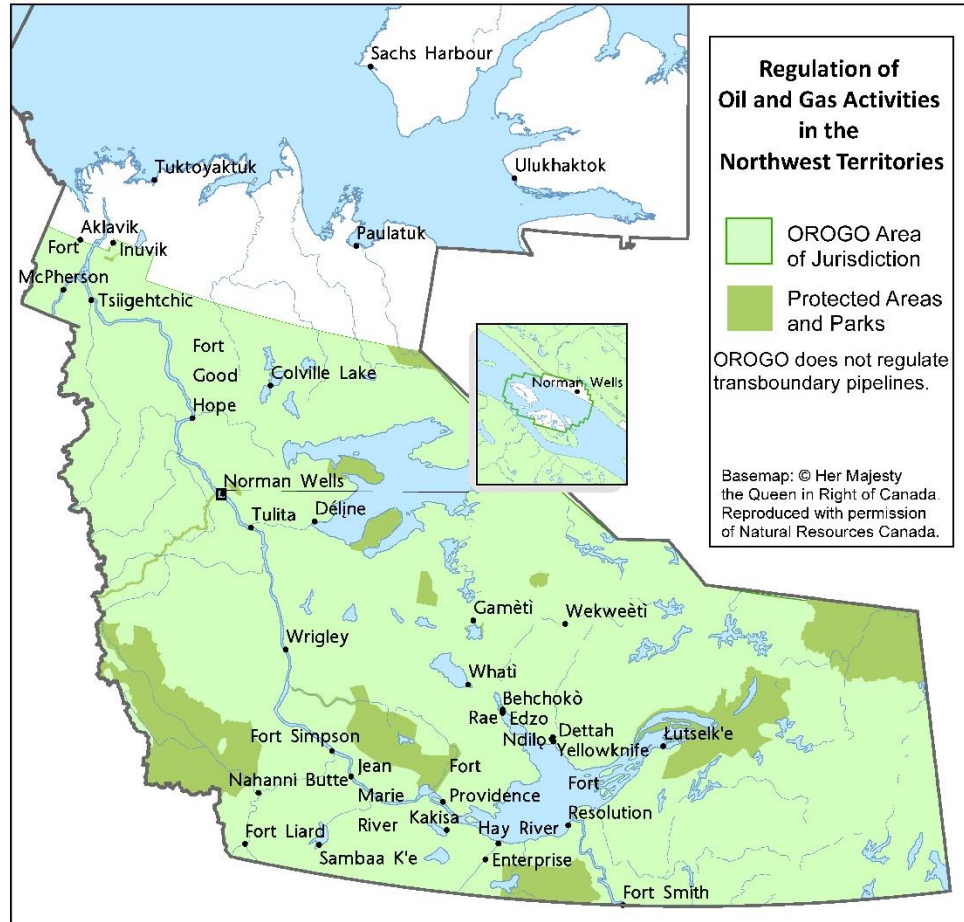
These Guidelines are issued by the Regulator under section 18 of OGOA.

Regulator's Discretion

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

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Jurisdiction



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2. PURPOSE AND SCOPE OF CONTINGENCY PLANS

Contents	This section describes the purpose and scope of Contingency Plans submitted to the Regulator.
Objective	Operators understand the purpose, content and scope of Contingency Plans submitted to the Regulator.
Requirements	Section 6(j) of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) requires that Contingency Plans, including emergency response measures, are submitted with applications for an Operations Authorization.
Purpose of a Contingency Plan	<p>A Contingency Plan should include statements and information that describe its purpose and demonstrate that the operator understands the relationship between the Contingency Plan and operator and contractor management systems, legal requirements, and the work to be completed.</p> <p>The Contingency Plan should serve as a summary and detailed reference document that describes all emergency response procedures and how they will be implemented in the case of an emergency.</p>
Scope of a Contingency Plan	<p>The scope statement should describe what is covered and what is excluded and provide for coordination measures with any relevant municipal, provincial, territorial or federal emergency response plan, including up to date local contact information. The scope should also include coordination measures with local First Nations, including up to date local First Nation contact information. The scope should describe the typical work and activities to be conducted, as well as critical support processes, including but not limited to logistics and program administration. The scope should encompass all activities described in the OA description of the proposed activities (see paragraph 6(a) of the OGDPR).</p> <p>The Contingency Plan should identify the operational boundaries or location of the work or activity and the proposed timing of activities (temporal scope). The scope should describe emergency response procedures for remote and inaccessible locations where access to resources, services or personnel could be limited.</p>

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The Contingency Plan should identify the specific aspects of the planned work or activities to which the Contingency Plan will be applied, including any particular limitations to its applicability. This should include, as applicable, works and activities related to logistics, mobilization, exploration, drilling, construction, operations, decommissioning and abandonment, and post-abandonment.

Reflecting the Complexity of the Activity The scope and details of a Contingency Plan are a function of work activity, location, complexity and risk.

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3. FORMAT

Contents	<p>This section describes the formatting requirements for a Contingency Plan and addresses:</p> <ul style="list-style-type: none">• Integrated Health, Safety and Environmental Management Systems (IHSEMS); and• Version tracking.
Objective	<p>The Contingency Plan is organized appropriately.</p>
Format of a Contingency Plan	<p>There are no specific requirements for the format of a Contingency Plan. However, an operator should consider the following when organizing a Contingency Plan:</p> <ul style="list-style-type: none">• The Contingency Plan document forms part of the operator's management system and should be consistent with the overarching management system;• The Contingency Plan must adequately address the requirements outlined in the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR); and• For the production phase, the Contingency Plan must reflect commitments made in the approved Development Plan.
IHSEMS	<p>An operator may have an Integrated Health and Safety Environment Management System (IHSEMS). If so, the IHSEMS may be submitted, but it must meet the requirements of sections 6, 8 and 9 of the OGDPR.</p> <p>If an IHSEMS is submitted, the operator must also submit a concordance table, relating the parts of the IHSEMS to the requirements of the OGDPR and these Guidelines.</p>
Version Tracking	<p>Each version of the Contingency Plan submitted must:</p> <ul style="list-style-type: none">• Be submitted as an entire document;• Include information on the document version and date of publication; and• Identify the company officer responsible for the document.

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4. MANAGEMENT PLAN LINKAGES

Contents	<p>This section describes the links between the Management System and the Contingency Plan. It addresses:</p> <ul style="list-style-type: none">• Management system structure;• Separate emergency response procedures or systems;• The operator's emergency response policy; and• References to other documents.
Objective	<p>The Contingency Plan is a component of the operator's Management System and provides assurance that the operator can appropriately manage any level of emergency when conducting a specific work or activity.</p>
Requirements	<p>The Management System integrates operations and technical systems with the management of financial and human resources to ensure compliance with the <i>Oil and Gas Operations Act (OGOA)</i> and with the <i>Oil and Gas Drilling and Production Regulations (OGDPR)</i> (section 5(1) of the OGDPR).</p> <p>The Management System includes the policies on which the system is based (for example, the safety policy) (section 5(2)(a) of the OGDPR).</p>
Management System Structure	<p>The operator may determine the structure of the Management System taking into account the purpose of the system and required elements identified in section 5 of the OGDPR. The structure and the scope of the Management System may be broader than the requirements in section 5, but must meet those requirements.</p>
Separate Emergency Response Procedures or Systems	<p>An operator may have a separate Emergency Response System, or manage the emergency response elements of its activity through a general Management System.</p>

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5. CONTENT OF THE CONTINGENCY PLAN

5A. General

Contents This section provides general information on the contents of a Contingency Plan and specifically addresses:

- Level of detail;
- Overall responsibilities;
- Commitments by the operator; and
- Links to other plans.

Level of Detail The Contingency Plan must contain sufficient detail to be understandable and useful. The Contingency Plan is not a stand-alone document and should refer to rather than duplicate detailed information contained elsewhere in the Management System.

Overall Responsibilities The Contingency Plan should be responsive to other sections of the *Oil and Gas Operations Act (OGOA)* and its associated regulations, as applicable. Where the operator has developed detailed procedures or work instructions (or detailed procedures or work instructions have been developed by their contractors and accepted by the operator) to satisfy their emergency response responsibilities, the Contingency Plan should summarize the content of these documents rather than repeat the content. The Contingency Plan should explain the operator's due diligence, overall coordination and oversight of the work or activity, as well as appropriate operations and operation-specific information.

In order to maintain a high standard of operational safety, operators are expected to ensure that personnel, including contractors and other service personnel, are competent and well versed with the Contingency Plan.

Operators have a responsibility to ensure and demonstrate that they are fully prepared and capable of responding to any level of emergency. Emergency preparedness and response includes all activities done prior to an emergency so that designated personnel are ready and able to respond quickly and appropriately, as well as those activities that take place during the incident.

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Commitments by the Operator The Contingency Plan should reference and be responsive to commitments that the operator has made, with respect to emergency response, as part of the application process prior to work or activities being undertaken. This may include, but is not limited to:

- Commitments made in an application for a Development Plan Approval; and
- Commitments made in the application for authorization of a work or activity (Operations Authorization).

Links to Other Plans Linkages to relevant emergency response information in other plans should be included in the Contingency Plan.

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5B. Hazard Identification and Mitigation Measures

Contents	<p>This section describes how the Contingency Plan should address identification of hazards, the evaluation of risk and risk mitigation. It addresses:</p> <ul style="list-style-type: none">• Hazard and risk identification;• Mitigation measures and emergency response procedures;• Resources and equipment;• Site specific considerations; and• Notification requirements.
Objective	<p>Contingency Plans include all emergency and spill response procedures required to deal with all potential environmental and safety hazards identified for the operation.</p>
Requirements	<p>Section 6(j) of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) requires that contingency plans, including emergency response measures, are submitted with applications for an Operations Authorization.</p>
Hazard and Risk Identification	<p>The Contingency Plan must identify all hazards and risks associated with the proposed activity. Consider the potential for:</p> <ul style="list-style-type: none">• Slips, trips, pinches and falls;• Fire / explosion;• High pressure lines and equipment;• Electrical, hydraulic and/or mechanical energy;• Chemical exposure (e.g. sour gas);• Severe weather or conditions beyond design and/or operating limits, and forecast of such conditions at or in the vicinity of the planned work or activity;• Remote work sites;• Vehicle collisions/crashes;• Wildlife;• Ice management;• Precautionary down-manning;• Flight following and vessel tracking; and/or• Any other identified hazard.

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Mitigation Measures and Emergency Response Procedures

The Contingency Plan must identify mitigation measures and emergency response procedures to respond to emergencies. Consider the following possible emergencies:

- Spills including containment, recovery, tracking and forecasting of any spills and spill countermeasures;
- Loss of well control, including arrangements for drilling of a relief well and bringing a well under control;
- Loss or disablement of an operation, including any loss of power, energy, communication and control;
- Collision avoidance;
- Serious injury to or the death of any person;
- Fire / explosion;
- Chemical or radioactive exposure;
- Criminal activity or threats of criminal activity;
- Casualty medical evacuation;
- Evacuation, escape, rescue and abandonment;
- Person overboard;
- Loss of or damage to support craft; and/or
- Any other identified hazard or threat to the security of personnel and facilities.

Resources and Equipment

The Contingency Plan must identify onsite resources and equipment for emergency response. These should be sufficient for use by response personnel during an emergency.

Site Specific Considerations

The Contingency Plan should consider potential limits or delays in access to resources, services or personnel in remote locations.

Notification Requirements

The Contingency Plan should identify:

- Internal company notification requirements; and
- Notification requirements for:
 - Territorial and municipal governments;
 - Local First Nations, Indigenous governments and communities; and
 - Federal and territorial regulators.

Notification requirements should be updated every 6 months or as needed when new internal and external contacts are identified.

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5C. Organizational Structure

Contents This section describes how the organizational structure for emergency response should be addressed in the Contingency Plan.

Objective Individuals responsible for the implementation of the Contingency Plan are identified and the relationships between emergency response positions are clear.

Resources and Roles The Contingency Plan must include a detailed organizational structure that clearly outlines personnel responsible for the implementation of the plan in the event of an emergency.

The Contingency Plan should identify:

- Any key response personnel / roles;
- All internal personnel that will be involved in the event of an emergency; and
- Local contractors and other external personnel that could be involved in responding to an emergency.

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5D. Training and Compliance Monitoring

Contents	This section describes how the Contingency Plan should address: <ul style="list-style-type: none">• Training; and• Compliance monitoring.
Objective	All personnel are aware of and competent in their emergency response roles.
Requirements	Section 19(e) of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) requires that Operators ensure all personnel at an operation, or in transit to or from an operation, receive instruction and are familiar with: <ul style="list-style-type: none">• Safety and evacuation procedures; and• Their respective roles and responsibilities in the Contingency Plans, including emergency response procedures.
Training	The Contingency Plan must include information on emergency response training, drills and exercises. Contingency Plan training and exercises should include personnel from local First Nations, Indigenous governments and communities where possible.
Compliance Monitoring	The Contingency Plan must include information on how compliance with the plan will be monitored and how performance will be measured in relation to the objectives of the plan.

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5E. Change Management

Contents	<p>This section describes the requirement to address change management procedures in the Contingency Plan, including:</p> <ul style="list-style-type: none">• Change management triggers;• Change management expectations; and• Change management procedures.
Objective	<p>Continuous improvement of the Contingency Plan based on lessons learned.</p>
Requirements	<p>Section 15(1)(b) of the <i>Oil and Gas Operations Act</i> (OGOA) requires applicants for authorizations to formally declare that the applicant shall ensure, so long as the work or activity that is authorized continues, that the equipment and operation continue to be fit for the purposes for which they are used, the operating procedures continue to be appropriate for those uses, and the personnel continue to be qualified and competent.</p>
Change Management Triggers	<p>Events that may trigger changes to Contingency Plans include:</p> <ul style="list-style-type: none">• New regulatory requirements;• New management expectations;• New management procedures;• Lessons learned from emergency preparedness and response exercises; and• New or replacement equipment and technology.

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Change Management Expectations

Change can affect equipment, materials, procedures, practices, systems, and personnel, including risk assessment and approval processes.

Operators must manage all change to ensure that it does not compromise emergency response measures or systems. This is particularly relevant where emergency response systems and safety critical equipment may be impacted. The management of change process should:

- Define the roles of all levels of the organization in the management of change process that clearly identifies who can authorize any given change;
- Include hazard identification and risk management, commensurate with the nature of the proposed change;
- Ensure that those responsible for safety and environmentally critical policies and procedures review the proposed changes for acceptability; and
- Provide for effective communication with those who are affected.

Change Management Procedures

The Contingency Plan should summarize and refer to the operator's management of change procedures applicable to the work or activity, including processes for:

- Ensuring the revision, distribution and control of associated documents;
- Training with respect to the changes;
- Assessing competency with the new plan;
- Determining the appropriate number of competent people; and Documenting these elements (see section 6).

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6. RECORD KEEPING

Content	<p>This section describes the requirements for record keeping as part of a Contingency Plan. It addresses:</p> <ul style="list-style-type: none">• Maintenance of records; and• Documentation and document control.
Objectives	<p>Ensure that appropriate contingency-related records are available to the Regulator when requested and contingency-related documents are appropriately maintained and controlled.</p>
Requirements	<p>Section 77 of the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR) states that records must be kept of all emergency drills and exercises.</p> <p>Section 86(1) of the OGDPR requires that Operators submit a description of environmental contingency plan exercises when submitting annual Environmental Reports for production projects.</p> <p>Section 86(2) of the OGDPR requires that Operators submit a description of environmental contingency plan exercises when submitting annual Environmental Reports for installation of an exploration or delineation well.</p>
Document Control	<p>Operators are responsible for ensuring that documents associated with the Contingency Plan are complete, accurate, current and that changes to the Contingency Plan and revised documents are circulated to the appropriate personnel. Operators shall have processes and procedures in place for the following:</p> <ul style="list-style-type: none">• Approving documents prior to issue;• Periodically reviewing, updating, or withdrawing documents as necessary;• Ensuring that changes to, and the current revision of documents are identified;• Ensuring that relevant versions of applicable documents are available at points of use;• Ensuring that documents are accessible during power outages or other emergencies that could affect communications;• Ensuring that documents remain legible, identifiable, available for use and confidential as appropriate;

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- Ensuring that documents of external origin determined by the Operator to be necessary for the planning and operation of the management system are identified;
- Preventing the unintended use of obsolete documents and identifying such documents if they are retained for any purpose; and
- Ensuring the reliable, secure storage, protection, retrieval and retention of documents.

Record Keeping Requirements

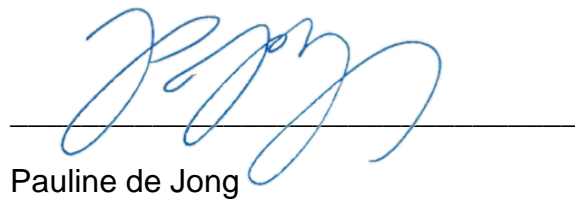
Operators must keep records of:

- All persons arriving, leaving or present on the operation;
- The location and movement of emergency drills and exercises, incidents, near-misses, the quantities of consumable substances that are required to ensure the safety of operations and other observations and information critical to the safety of persons for the operation or the protection of the environment;
- Daily maintenance and operating activities, including any activity that may be critical to the safety of persons for the operation, the protection of the environment or the prevention of waste; and
- In the case of a production operation:
 - The inspection of the operation and related equipment for corrosion and erosion, any observed physical damage, any variance outside tolerable limits from any non-destructive testing and any resulting maintenance carried out;
 - The pressure, temperature and flow rate data for compressors and treating and processing facilities;
 - The calibration of meters and instruments;
 - The testing of surface and subsurface safety valves;
 - The status of each well and the status of well operations; and
 - The status of the equipment and systems critical to safety and protection of the environment including any unsuccessful test result or equipment failure leading to an impairment of the systems.

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7. REGULATOR'S APPROVAL

These *Contingency Plan Guidelines and Interpretation Notes* are issued under section 18 of the *Oil and Gas Operations Act* effective February 15, 2021.



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