

PSSG Project Status:
Completion,
Implementation,
Sustainability and
Performance Measure
Tables

December 24, 2004

PSSG Project Status by Recommendation, Broken Down by:

- Action Taken and/or Current Status
- Or, Completed Recommendation
- Shows Performance Measure where possible

BRANCH: PUBLIC SAFETY IMPLEMENTATION TEAM

File: PSSG Project Status – Advisory Committee Update November 04

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability plan, deliverables and Performance Measure (PM)
5	Taskforce investigation of improved surface, subsurface planning – Ongoing, end date March 06 Links to Applications Rec's 7, 16 32, 33, 34, 53	Establish a pilot project to develop a complementary planning and development process Effective September 2004, an Action Plan with three objectives has been approved by the Senior Steering Committee and the Advisory Committee. Objectives are: <ol style="list-style-type: none"> 1) Investigation of processes where opportunities might exist to improve the coordination between surface/subsurface planning and development in sour gas areas near people 2) Improved Availability and Communication of Information Related To Development In Sour Gas Areas Near People 3) Establishment of a Process to Facilitate Joint Coordinated Planning and Agreement for Surface/Subsurface Development Four areas of the province are being considered for the pilot project. These are: an area north of Calgary, an area north of Edmonton and St. Albert, an area north and east of Red Deer and the Caroline area. The Working Level Committee is presently investigating choosing a pilot area.

9, 59	<p>Health effects information for H2S and SO2 – Ongoing, end date August 05</p> <p>Links to other Health recommendations and Emergency Response Planning recommendations</p>	<p>AHW has completed an H2S research literature review and has made the report publicly available. An SO2 literature review is now complete and is being reviewed by an expert panel. Final SO2 literature review expected in early 2005.</p> <p>AHW has sent the EUB proposed revised emergency evacuation criteria that include concentration and time elements – these will be used in ERP rec's. Proposed updated SO2 evacuation levels are also expected from AHW.</p> <p>NOTE: A strategy is being developed that may lead to a central call-centre staffed by medical professionals. This centre could act as a central information collection and dissemination point that could facilitate or focus further sour gas related health research and/or actions that could serve to fulfill expectations for all seven PSSG health related recommendations. A presentation on this strategy was made to the PSSG Advisory Committee in early September 2004 and was received in a positive manner.</p>
10, 11	<p>Develop sour gas research strategies – Ongoing...links to all other health recommendations</p>	<p>Work via several initiatives addresses these rec's in part. These include: Community Exposure and Health Effects Assessment – SO2, Western Inter-provincial Scientific Studies Assoc. (animal health study). May also include Caroline Livestock Health Study – now in its 13th year.</p> <p>A new study known as “Exposure to Low Levels of Hydrogen Sulphide – Symptoms, Sensory Function and Cognitive Performance,” is now underway at Rutgers University in the U.S. This study is exposing human volunteers to levels of 0.05 parts per million of H2S, 0.5 ppm H2S and 5.0 ppm of H2S in random order one week apart.</p> <p>See above 9, 59 – a central call centre and tracking system may be able to identify areas and/or issues with research potential.</p>
12	<p>Establish a coordinated, consistent medical response to H2S exposure – Ongoing, links to all other health recommendations</p>	<p>AHW, Alberta Medical Association, & Human Resources and Employment (HRE) have drafted clinical practice guidelines for H2S exposure. These guidelines are now being peer reviewed are expected to be available in early 2005.</p> <p>The clinical practice guidelines would provide the basis for a standardized response to hydrogen sulphide exposure.</p>
13	<p>Establish a sour gas exposure registry to track people who have experienced high level H2S exposure – Ongoing, links to all other health recommendations</p>	<p>Issues identified included the cost and resources needed to track a limited number of people over decades, problems with obtaining medical records (could contravene Health Information Act).</p> <p>However, a central call-centre could provide opportunities for the collection of exposure and health effects information.</p>
67	<p>Develop personal H2S exposure monitors and protocol for their use – Ongoing, links to all other health recommendations</p>	<p>Advanced prototype unit developed and field-tested. Funding needs for commercial production/development could be very high. Funding solutions are being evaluated, as are the costs of future development. Future work could be delayed or perhaps outsourced to a third-party. AHW and the EUB will continue to pursue this.</p> <p>The rec calls for the development of protocols for the use of these devices when they are developed. How they will be used remains to be determined, but could impact the EUB – particularly Field Surveillance.</p> <p>Protocols for use will be drafted. See 9, 59 note on CHHMS above – this system could involve use of the personal H2S monitors by individuals, communities or synergy groups.</p>

46	EUB role as regulator for public safety – Ongoing, end date March 2006 Links to all 87 PSSG rec's and other non-PSSG mandated public safety issues	Adv. Committee is clear that PSSG work must continue to remain effective. Need to develop and manage a way to measure results and increase EUB reputation for effectively managing public safety issues. PSSG team is working with senior EUB management on future course of action to ensure we continue to benefit from PSSG work. In the meantime, PSSG Team is working with Branch Coordinators, Branches and Groups to put performance measures and sustainability plans in place on completed, or about-to-be-completed recommendations.
48	The manner of EUB funding be reviewed COMPLETE & IMPLEMENTED No links	COMPLETE – The Minister of Energy commissioned a funding review committee. Current funding is 60% from industry via annual levy, 40% from government. The EUB is continuing to make representation to government towards a 50/50 split. Completion statement has been forwarded to PSIT. Sustainability – Necessary staff and processes are in place PM – CAPP, other stakeholders and EUB continue to speak to government on this issue.
66	Clarify and co-ordinate monitoring roles and responsibilities COMPLETE & IMPLEMENTED No direct links	COMPLETE – AENV leads in ensuring that air monitoring associated with public safety is adequately addressed. This is reflected in the Alberta Upstream Petroleum Incident Support Plan. As well, IL 98-01 MOU between AENV and EUB regarding coordination of release notification requirements is in place. Completion statement has been done by PSIT. Sustainability – Necessary staff and processes are in place. Deliverable - The Upstream Petroleum Incident Support Plan PM – The Upstream Petroleum Incident Support Plan contains clear roles and responsibilities for air monitoring in the event of an emergency. There is a periodic review of this plan.
83	EUB consider forming an Aboriginal Advisory Committee COMPLETE & IMPLEMENTED No direct links	COMPLETE – The EUB has established an Advisory Committee involving senior leaders from within the Aboriginal community. An initial meeting has been held. Completion statement has been done by PSIT. Sustainability - Necessary staff and processes are in place. PM – Annual meetings will be held to obtain a better understanding of Aboriginal issues relating to energy development in Alberta. (Perhaps an annual report on all EUB Aboriginal activity/involvement?)

BRANCH: COMPLIANCE AND OPERATIONS

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
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8	<p>Soften the visual impact and impressions effects of sour facilities</p> <p>COMPLETE and IMPLEMENTED</p> <p>No links</p>	<p>COMPLETE - Research from other jurisdictions is complete. EUB has incorporated this concept into EnerFAQS 8 "Proposed Oil & Gas Development – A Landowner's Guide" to address this recommendation</p> <p>Completion statement has been forwarded to PSIT</p> <p>Sustainability - Communications will maintain EnerFAQS 8. Deliverable – EnerFAQS 8 PM – The intent of this rec. was to "encourage operators to consider methods for reducing the visual and psychological impacts of sour gas facilities near people." The EUB believes it has met this intent and will monitor ad hoc public complaints and continue to "encourage" operators</p>
15	<p>To ensure there is a thorough follow-up process after major sour gas releases to determine impacts and identify opportunity for response improvement</p> <p>COMPLETE & IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – A staff project team developed an Incident Response and Reporting Protocol (Internal Guide 26) adopted January 03. As well, the Alberta Upstream Petroleum Incident Response Plan was updated w/ stakeholders by Emergency Management Alberta in 2003</p> <p>Completion statement has been forwarded to PSIT</p> <p>Sustainability – Existing Staff and processes are in place. Deliverables – Internal Guide 26 and Upstream Petroleum Incident Support Plan</p> <p>PM – 1) The EUB conducts an assessment of response after every incident 2) Stakeholders are involved in regularly scheduled reviews of the Alberta Upstream Petroleum Incident Support Plan</p>
17, 18, 19, 58, 62	<p>17, 18, 19 Standardize dispersion and risk assessment modeling</p> <p>58, 62 Review process for defining EPZ's and require that ERP's show H2S and SO2 evacuation zones</p> <p>Ongoing, end date March, 2005</p> <p>Links to Compliance & Ops 52, 53, 58, 62: PSIT 5: Applications 7, 32, 33, 34</p>	<p>17, 18, 19: Two protocols will be established: one for calculating emergency planning zones for sour wells, pipelines and facilities. The second for estimating risk from sour wells, pipelines and facilities. The protocol for calculating EPZ's has been released for stakeholder comment, and changes have been incorporated into the draft protocols.</p> <p>The new ERP protocol will change how EPZ's are calculated and will supercede existing EUB nomographs. In November 2004, the EUB hosted a multi-stakeholder discussion on EUB MODELS and EPZ endpoints to provide opportunity for broad stakeholder input into the process. The EUB is preparing a report to stakeholders on what was heard at that meeting and plans to release the report during the winter months of early 2005. Following input from stakeholders, the report and stakeholder comments will be provided to the Board of the EUB. Details of work and stakeholder involvement can be found at:</p> <p>http://www.eub.gov.ab.ca/BBS/new/Projects/stakeholdermeeting11262004.htm <http://www.eub.gov.ab.ca/BBS/new/Projects/stakeholdermeeting11262004.htm></p> <p>58, 62: Work is dependent on rec's 17, 18. An internal EUB team is continuing to address and explain the new EPZ protocol method to the public and industry, and review existing emergency response terminology that better reflects meaning and intent.</p> <p>EUB team currently working with industry to develop an implementation strategy so that both the industry and the EUB can transition into the new requirements smoothly.</p> <p>Following completion of the EPZ component, work will begin on risk, which in turn has Rec's 52 and 53 as dependencies.</p>

<p>21</p>	<p>Review requirement for older sour gas pipelines – ensure attention to corrosion</p> <p>COMPLETE & IMPLEMENTED</p> <p>Indirect link to Rec. 25 – EUB increase frequency of inspections...inform residents of results</p>	<p>COMPLETE – The EUB had previously identified this need and work had already begun prior to PSSG. Results: Guide 66 – Pipeline Inspection Manual completed & implemented in Nov. 2001. EUB Field Surv. initiated its OSI process for pipeline inspections. The Canadian Standards Assoc was asked to consider added requirements for sour lines – these have been developed and are expected in 2005.</p> <p>Completion statement has been forwarded to PSIT</p> <p>Sustainability – Existing staff and processes are in place. Deliverable – Guide 66 Pipeline Inspection Manual and new CSA standards</p> <p>PM – Performance will be measured via: G-66 Pipeline Inspection results Field Surv. OSI program tied to Field Inspection System (FIS) w/ focus on four items:</p> <ul style="list-style-type: none"> • Pipeline failures/hits • Construction & pressure testing • Operations Inspections • Contact damage <p>New CSA standards when applied in 2005 Results reported in annual Field Surv. Provincial Summary</p>
<p>22</p>	<p>Review adequacy of third-party damage prevention for sour pipelines</p> <p>COMPLETE and IMPLEMENTED</p> <p>No links</p>	<p>COMPLETE – After stakeholder consultation, the EUB drafted requirements that all pipeline operators participate w/ Alberta One-Call, and that anyone excavating near a pipeline must use Alberta One-Call for pipeline locations. These regulations are now with Alberta Legislative Counsel for review. The EUB will implement once regulations are in place.</p> <p>Completion statement has been filed with PSIT Sustainability – Staff and processes are in place. Deliverable – new regulations.</p> <p>PM – Pipeline failures/hits and damage contacts are key inspection areas for Field Surv. and are reported on in the annual Field Surv. Provincial Summary</p>
<p>23</p>	<p>Reclassification of sweet gas facilities to sour service and reactivation of older sour wells</p> <p>Ongoing, end date Sept. 2005 Small link to Rec. 24</p>	<p>The project team has reviewed current EUB requirements and has made needed changes to these for reclassification of sweet to sour service.</p> <p>Draft new facility suspension requirements for reactivation have been prepared and are being reviewed internally for implementation as regulations and will be sent to Legislative Counsel for approval, once completed.</p> <p>Directive 013 for suspending and reactivating suspended wells was issued by the EUB in December 2004.</p>

24	<p>Publicize requirements to convert existing pipelines to sour service</p> <p>COMPLETE and IMPLEMENTED</p>	<p>COMPLETE - An article publicizing the requirements for sweet to sour pipeline conversion was published in the EUB's Across the Board April 2004. In October 2004 a document entitled "Reference Tool for Sour Service Conversion of Existing Carbon Steel Pipelines" was posted on the EUB web site under Guide 56: Energy Development Applications and Schedules. The document refers to the EUB Pipeline Regulation and CSA standards and highlights requirements contained in Guide 56. The document demonstrates that a detailed engineering assessment must be undertaken by any company that wished to convert a non-sour service pipeline to sour service.</p> <p>Completion statement has been filed with PSIT Sustainability – Staff and processes are in place. Deliverable – new reference tool.</p> <p>PM – The licensee is required to conduct an engineering assessment and must provide the EUB information on technical compliance with respect to pipeline material, design, construction, and nondestructive testing as well as pipeline integrity</p>
30	<p>Accelerated enforcement where non-compliance threatens health & safety</p> <p>Ongoing, end date Dec. 2005 Link to 31</p>	<p>Being completed. Recommendation 30 is tied to a new Enforcement Directive being prepared for the Board by the Compliance and Operations Branch.</p> <p>The EUB has recently reviewed its compliance strategy. Following this review, the EUB began developing a comprehensive compliance assurance plan that builds on the strengths of the present compliance strategy. This plan includes prevention, education, and information before noncompliance occurs and, should a noncompliance event occur, responsive, appropriate enforcement. It is anticipated the new plan will be rolled out to stakeholders in late 2004, or early 2005.</p>
31	<p>Increase availability of information on enforcement actions</p> <p>Ongoing, end date Dec. 2005 Link to 30</p>	<p>Being completed. See 30 above. Compliance performance information is being reviewed as part of the new comprehensive compliance assurance plan.</p> <p>During this process the EUB continues to report enforcement actions that result in Board Orders on the EUB's public web site.</p>
49	<p>Ensure that EUB sour gas requirements continually reflect appropriate technology and practices</p> <p>Ongoing, end date March 2005</p> <p>Links to 35, 36, 50, 51</p>	<p>Being completed. The EUB is developing a Best Management Practices strategy process to review EUB sour gas requirements on a regular basis – and to advance the use of the most up to date practices and technologies. EUB staff are reviewing</p> <p>This best practices strategy is currently being reviewed with senior management</p>

<p>50</p>	<p>Training for Alberta's sour gas workers</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to Applications Rec. 36 Training/Certification, Field Surveillance Rec. 27 Critical Sour Well Inspections plus 49 and 51</p>	<p>COMPLETE - A review has been completed that researched approximately 160 oilfield position titles for employee training requirements. The review found that requirements were outlined in broad general terms in legislation, and that these general terms became more specific in regulation and/or industry practice. The review indicated that ALL identified legislated OR regulated training requirements can be provided by existing training providers.</p> <p>The EUB believes that this report and review verifies that current delivery of programs meets the training requirements for workers on wells, pipelines and facilities, and confirms that industry is committed to supporting the necessary training and certification processes for oilfield workers.</p> <p>Completion statement has been filed with PSIT</p> <p>PM – Being developed as part of a group of recommendations that relate to sour gas operations</p>
<p>52, 53</p>	<p>Setback and setback implication review on surface development</p> <p>Ongoing, end date Sept. 2005</p> <p>Links to 17, 18, 19 Dispersion modeling/risk assessment for sour wells, sour pipelines and sour facilities</p>	<p>Once new dispersion modeling/risk assessment frameworks are adopted by the EUB, they will to be used as the basis of a setback review. A failure frequency analysis report by Bercha is currently in draft and under review.</p> <p>A consultant has been contracted to review the economic impact of setback for Rec #53. A multi-stakeholder committee has been formed. Case studies have been selected and information is being gathered on each case study.</p> <p>Substantive work cannot begin on #52 until protocol for estimating risk is delivered. Although detailed work has not started on this protocol, once the hazard (EPZ) protocol is complete (required before you can consider frequency) the software required to undertake the analysis will be based on the EUBMODELS software with a frequency component using the Bercha data.</p>

<p>54, 60 & 61</p>	<p>The EUB continue to review site-specific ERPs in detail...industry uses the EUB standard approach until Rec. 58 is done...in the interim the EUB not approve reduced EPZs unless conditional upon ignition</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 58, 9, 17, 18, 19</p>	<p>COMPLETE – ID 2001-5 confirms or clarifies the following:</p> <ul style="list-style-type: none"> • Continued EUB review of site-specific ERPs • Require the use of EUB standard EPZ curves • Allow reduced EPZs based on immediate ignition where: <ul style="list-style-type: none"> - Calculated EPZs are very large, or - Have large population densities, & - Evacuation may be impractical <p>EUB also continues to require a concise plan for a reduced zone</p> <p>Completion form has been filed with PSIT</p> <p>Sustainability – existing staff and processes are in place. Deliverable – Once new EPZ protocol is implemented in G-71, ID 2001-05 will be rescinded.</p> <p>PM – All site-specific ERPs are reviewed. Pre-approval for a reduced zone is required – such a request goes through a thorough review process</p>
<p>55, 56</p>	<p>Assess capability to implement ERP's and increase ERP audits/tests</p> <p>Ongoing, end date March 2005</p> <p>Links to 52, 53 (above) 57, 63, 64 (below) and 58, 62 (below)</p>	<p>Being completed. An ERP assessment/inspection protocol has been completed in draft form and two pilot projects to test the protocol have been held. The pilot projects will assist in identifying if additional resources are needed to meet objectives of assessment protocol.</p> <p>Stakeholder feedback has been sought on both pilot projects. Meetings with industry have been held to review the pilots.</p> <p>A third pilot project is planned for December 2004. Results of all three pilot projects will then be used to further refine the protocol and to work towards implementing a full scale assessment program. Note: The EUB has determined that the term "assessment" is more appropriate than the term "audit."</p>
<p>57, 63, 64</p>	<p>Emergency management guide and requirements to coordinate responder roles</p> <p>Ongoing, end date Dec. 2005</p> <p>Links to 9, 59 - H2S, SO2 health info, 17, 18, 19, 58, 62 (above) 52, 53 (above) 55, 56 (above)</p>	<p>Being completed. Guide 71 replaced several EUB documents.</p> <p>New Guide 71 revisions are also being completed. Revised EPZ protocols resulting from the work being done under Rec's 17, 18 & 19 will be incorporated into G-71 once completed. Depending on the outcomes occurring from 17, 18 & 19 – there may be a need for further stakeholder consultation.</p> <p>Further changes to Guide 71 are planned to include new H2S evacuation criteria based on advice from Alberta Health and Wellness. Work continues on SO2 by AHW and when this is available, the EUB will undertake a similar review of SO2 evacuation criteria and will make changes to Guide 71 as appropriate.</p> <p>Industry Recommended Practices on Critical Sour Under balanced Drilling were published in January 2004.</p>

87	<p>EUB work with Indian & Northern Affairs Canada (INAC) Health Canada & Alberta Municipal Affairs to ensure that adequate infrastructure and resources are available for First Nations & Metis communities to plan & implement a response to a sour gas emergency</p> <p>COMPLETE & IMPLEMENTED No Links</p>	<p>COMPLETE – It became apparent the Adv. Committee did not have all available information relating to this recommendation. A presentation from Alberta Disaster Services (ADS) provided missing information and reassured the Committee. ADS requires that all 312 Alberta municipalities have an emergency plan & staff responsible for the plan. The 8 Metis settlements are part of that, while the 46 First Nations communities are part of a MOU between INAC and ADS, who have staff responsible for First Nations.</p> <p>Completion statement has been filed with PSIT</p> <p>Sustainability – existing processes are in place</p> <p>PM – There is regular training on ADS programs to Metis and First Nations, and the entire MOU and its program are re-negotiated between ADS and INAC on a three year cycle</p>
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BRANCH: APPLICATIONS

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
6	<p>More rigid enforcement by the EUB of its gas plant proliferation policy</p> <p>COMPLETE and IMPLEMENTED Indirect link to Rec. 7 – other facilities proliferation</p>	<p>COMPLETE - Recommendations from the Sulphur Recovery Guidelines Review Advisory Group were considered in developing ID 2001-03. Section 6 of the ID deals with requirements to assess sour gas plant proliferation</p> <p>Completion form has been filed with PSIT</p> <p>Sustainability – ID 2001-03 requirements have been rolled into Guide 56, Sec 5.9.3. G-56 has an on-going assessment function. Processes and staff are in place. Deliverable – ID 2001-03 – Section 6.</p> <p>PM – Existing application assessment processes are used to monitor compliance with G-56 and ID 2001-03</p>

<p>7, 32, 33</p>	<p>Require applicants to consider use of existing sour gas infrastructure and submit information on possible future sour gas developments near people - Ongoing, two year trial date begins May 04, ends April 31/06</p> <p>Links to PSIT 5, Apps 34</p>	<p>Being completed. Bulletin 2004-08 Sour Gas Development Planning and Proliferation Assessment was released on May 17, 2004. This bulletin introduces industry recommended practices and applies to all new sour gas well, pipeline and facility developments where there are people in the EPZ or adjacent to it who desire planning information. It also applies to those who desire an assessment of proliferation to understand potential impacts. A two-year trial use of Industry Recommended Practiced (IRP) commences Spring 2004 during which EUB staff will proactively support use of IRP and gather data on use and effectiveness. A multi-stakeholder committee is also proposed to monitor and evaluate the trial.</p> <p>A multi-stakeholder committee is in place and meeting regularly, developing an evaluation process and consulting with community groups.</p> <p>Some additional staff effort may be needed on an ongoing basis; the trial will indicate how the IRP is being used and whether changes to regulation are required. If new regulation is required, EUB application and assessment processes may have to be modified.</p> <p>Although outside the scope of this initiative, the use of this IRP could eventually spread beyond sour gas.</p>
<p>34</p>	<p>EUB increase and improve coordination w/ AENV, RHA's and other local government – Ongoing, end date March 06</p> <p>Links to 5, 7, 32, 33</p>	<p>Being completed. Have drafted framework and protocols to improve coordination and cooperation between the EUB and local gov't on policy matters.</p> <p>Municipal protocol is in process of being signed. Activity includes: October 2004 meeting with District 2 of Alberta Association of Municipal Districts and Counties (AAMDC). A January 05 meeting will be held with District 3 AAMDC.</p> <p>A protocol to include RHA's is being reviewed. The regional dialogue process has been launched in two regional health authorities (Calgary, David Thompson (which includes Red Deer, Sundre etc.) and possibly Northern Lights (Ft McMurray) and three municipal zones in 2004, with implementation in remaining areas to happen during 2005 fiscal year. Activity includes: Series of regular dialog process with Calgary Health Region and David Thompson Health Region, September meeting with Alberta Council of Medical Officers of Health (COMOSH) and other medical professionals such as public health inspectors from across Alberta. Further December meeting was held for those unable to attend the September meeting.</p>
<p>35</p>	<p>Critical well licence preview</p> <p>COMPLETE & IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – With the October 2000 revision to EUB Guide 56, all Category “E” (critical) sour well and facility applications are subject to staff review prior to approval. Review includes consultation, emergency planning zone determination, H2S release rate calculation, well design</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Existing staff and processes are in place Deliverable – revision to G-56</p> <p>PM – Each critical well application is subject to Applications Assessment. Statistics on non-compliance are kept by the Applications Branch</p>
<p>36</p>	<p>Require information in applications for critical sour wells on training and certification information</p> <p>COMPLETE & IMPLEMENTED</p> <p>Link to Rec. 3</p>	<p>COMPLETE – EUB compiled an inventory of current training, certification & design requirements for drilling, completions, and operations at sour wells. EUB staff believe that applications information, plus the internal up front review, plus the fact that Field Surv. checks training and certification on rig inspections makes this recommendation complete.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Existing staff and processes are in place.</p> <p>PM - Field Surveillance tracks its rig inspection results and reports annually. Applications conducts up-front reviews of Category E sour facilities</p>

37	<p>EUB involvement in mediating application issues</p> <p>COMPLETE & IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – The EUB has developed an effective and efficient Appropriate Dispute Resolution process, with close to 200 staff trained in ADR. There is a full-time ADR coordinator on staff within the Applications Branch</p> <p>Completion form filed with PSIT</p> <p>Sustainability - Existing staff and processes are in place. Deliverable – IL 2001-01 Appropriate Dispute Resolution (ADR) Program and Guidelines for Energy Industry Disputes</p> <p>PM – A public ADR annual report is produced and results are analyzed</p>
14	<p>Awareness in First Nations communities on which agencies are responsible for sour gas health services</p> <p>COMPLETE & IMPLEMENTED</p> <p>Links to 12, 75, 76, 85</p>	<p>COMPLETE – Project team comprised of EUB, Health Canada First Nations & Inuit Health Branch and Alberta Health and Wellness compiled information on health services available to First Nations near sour gas development, surveyed health staff in 11 impacted aboriginal communities to establish degree of awareness of these services to identify gaps in awareness and made a final report (IS REPORT FILED W/ PST?) Report found that First Nations are aware of health services but identified two gaps: need for general sour gas information to be shared with local health centre staff and that industry improve communications with aboriginal people on development and emergency response plans. Also identified a need for Health Canada to clarify roles and responsibilities of its staff on reserves in the event of a sour gas incident.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Gaps are able to be addressed via other PSSG initiative work such as: establishment of a Comprehensive Human Health Monitoring System (1-800 phone access for medical advice on air quality issues being established); a complaint/incident response program for aboriginal communities – complete and implemented; increase public awareness and understanding of sour gas issues, and provide increased understanding of sour gas issues by providing clear, understandable information on technical matters.</p> <p>PM – To be developed in concert with other directly related PSSG initiative work</p>
38, 41, 42, 43, 44	<p>Linked cluster of rec's to improving the EUB hearing process so the public can participate more effectively and understand how EUB evaluates, balance and reaches decisions</p> <p>COMPLETE & IMPLEMENTED</p>	<p>COMPLETE - A series of actions has been taken. Staff work with the public in advance of hearings. Staff work with stakeholders to attempt to accommodate their time constraints in the scheduling of hearings. Within the Facilities Applications Group, past performance of an applicant is evaluated as part of the applications audit performed on many non-routine files. EUB panel members have specific expertise, changes have been made to how decisions are written, and a plan has been approved to monitor and follow up on decision conditions</p> <p>Completion forms for 38, 41, 42, 43 filed with PSIT</p> <p>Sustainability: Staff continue to work closely with hearing stakeholders as part of the EUB's hearing process. Internal review of the corporate history of an applicant by EUB staff continues on an on-going basis. Enhancements to Decision report style and content will continue to be reviewed internally. Board expertise continues to be drawn from full-time board members, and/or internal or external acting board members as specific areas of expertise are required. A process to ensure decision conditions are followed is in place and active.</p> <p>PM – Surveys of the public involved in EUB hearings is being piloted to determine overall levels of satisfaction.</p>

Missing completion statements for 44

BRANCH: CORPORATE SUPPORT (COMMUNICATIONS)

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
45, 47	Perception of the EUB's neutrality - COMPLETE and IMPLEMENTED	COMPLETE - Being completed - EUB has developed a three year strategic communications plan: <ul style="list-style-type: none"> - staff neutrality training programs. Law Branch has prepared Neutrality Principles that have been approved by the EUB Board – working with Communications on completing these recs. - MLA's and local governments are visited to reinforce EUB's role as a neutral, impartial regulator - Relationship with Alberta Weekly Newspaper Assoc. developed - Media training for staff to ensure message clarity in neutrality <p>Waiting on completion forms</p> <p>PM - Being developed as part of a group of recommendations related to energy development, planning and approval</p>
51	Use of best practices in sour gas development by industry Ongoing, end date Feb. 04 Direct link to Compl & Ops 49	Being completed - Consultant has conducted a survey of current industry sour gas practices to establish baseline data. This will tell whether or not industry uses a best practices approach. Consultant has filed report. Report will be passed on to Compliance and Operations for potential tie-in with Rec. 49 - Ensure that EUB sour gas requirements continually reflect appropriate technology and practices.
71	EUB takes stringent action for poor public consultation COMPLETE & IMPLEMENTED No direct links	COMPLETE – Requirements for acceptable public consultation were rolled into the revised EUB Guide 56. Applications assessment now examines consultation as part of its assessment function. EUB public hearings can also hear evidence on public consultation and can be part of an EUB Decision. Completion form has been filed with PSIT Sustainability - Existing staff and processes are in place PM – Guide 56 Participant Involvement requirements, Applications assessment, and EUB public hearings and decisions
72	Questions to assist the public during consultation COMPLETE & IMPLEMENTED Indirect links to 71	COMPLETE - The EUB has prepared ENERFAQS 8 – Proposed Oil and Gas Development, A Landowner's Guide. This contains a list of questions for the public to ask the energy industry. Guide 56 requires industry to supply this publication to the public. Completion form has been filed with PSIT Sustainability - Existing staff and processes are in place. Deliverable – EnerFAQS 8 PM – Guide 56 Participant Involvement requirements, Applications assessment, and EUB public hearings and decisions

<p>69, 70, 74</p>	<p>Establish public consultation staff resource team – more consistent approach to consultation and training, action for not conducting effective consultation –</p> <p>Ongoing, end date December 05 Links to 5, 7, 32, 33, 34</p>	<p>Being Completed - New Participant Involvement sections are in G-56, repealing use of IL 89-4. EUB worked with CAPP on CAPP's new Public Consultation manual. Working with Synergy Development Teams for capacity building and communications within synergy groups. EUB sits on Industry Landowner Relations team (ILOR) which is also examining PI gaps and how EUB can be involved</p> <p>Sustainability - Work is ongoing. Performance measures are being developed.</p>
<p>73</p>	<p>Establish EUB Information Office –</p> <p>Ongoing, end date Dec 05</p> <p>Links to 16, 75, 81 – indirectly to all other PSSG rec's</p>	<p>Being Completed - Create a "Public Zone" web site that is easy to use, easy to understand, and yet linked to relevant detailed technical information. Web site design is well underway and information is being prepared. Information will also be available by telephone.</p> <p>Sustainability – Work is ongoing.</p> <p>PM – when there is significant change to the web site, an on-line snap survey of users will be conducted.</p>
<p>75</p>	<p>Raise public awareness of sour gas issues –</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 76, 80, 81</p>	<p>Complete – While the wording of 75 referred to information events, the intent was to increase public awareness and understanding. Thus, the scope was broadened to include information and training materials. The three recommendations 75, 76 and 80 together cover the widest possible scope. A variety of events and information tools have been developed and implemented. These include ongoing information sessions, an Aboriginal Youth Learning Project (which is also part of a cross-ministry initiative), sponsorships of learning opportunities (see 76 below), communications products such as a CD-Rom, booklets and information kits.</p> <p>The EUB realizes that the task of increasing public awareness and providing credible information to Albertans is a never ending responsibility.</p> <p>Sustainability – Staff and processes are in place. Completion form filed with PSIT</p> <p>PM – Being developed under a broader category of participant involvement effectiveness</p>
<p>76</p>	<p>EUB prepare clear, understandable public information on technical matters such as ERPs, setbacks, risk assessment</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 73, 75, 80, 81</p>	<p>Complete – (See 75 above) Easily understood information has been prepared on a number of topics in a variety of media (CD-Rom, video, webcast, print). A children's series, Petroleum Play and Power Play developed. Alberta Science Foundation science education crate developed. "Eye on Energy" profiled with 2,500 schools – exposing >10,000 teachers and children to this learning opportunity An on-going series of EnerFAQs is constantly being added to and updated – Emergency Planning booklet is being prepared.</p> <p>Sustainability – staff and processes are in place. Completion form filed with PSIT</p> <p>PM - Being developed under a broader category of participant involvement effectiveness</p>

80	<p>EUB put greater emphasis on developing relationships with all of its stakeholders –</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to all PSSG rec's</p>	<p>Complete - Very broad scope. Two provincial synergy conferences have been held and a third is planned for early 2005 in Edmonton. A synergy group directory has been developed, and a Synergy Action Team has been struck to develop a synergy umbrella organization – work on this is nearing completion. Visit www.synergyalberta.ca</p> <p>An initial advertising campaign is complete and second one is underway - provincial weekly newspapers carry EUB produced materials. Future actions will involve communications support for most PSSG recommendations.</p> <p>Sustainability – staff and processes are in place. Completion form has been filed with PSIT</p> <p>PM - Being developed under a broader category of participant involvement effectiveness</p>
81	<p>Public consultation and information materials on the role of the EUB</p> <p>Ongoing, end date March 05</p> <p>Links to 73, 75, 76, 80</p>	<p>Being Completed - The "role of the EUB" is broader in scope than sour gas – many tools and topics are covered by videos, web site, brochures, children's education materials. Public consultation and information materials are being rolled into the Public Zone web site (Rec. 73) into the Synergy Action Team umbrella organization and into Industry Landowner Relations (LOR) materials. Future actions will involve most EUB roles and activities, i.e. Coal Bed Methane (CBM). A video depicting the EUB's long regulatory history is being developed.</p> <p>Sustainability - Work is ongoing. Performance measures are being developed.</p>
86	<p>Timely and meaningful consultation for First Nations/Metis</p> <p>COMPLETE & IMPLEMENTED</p> <p>Indirect links to other Aboriginal Recommendations</p>	<p>COMPLETE - An analysis was done of existing requirements for public consultation including that with Aboriginal communities. (New consultation requirements are in place, see Rec.'s 69, 71). In EUB Guide 56, all EUB requirements and expectations for participant involvement apply to all persons and communities. The EUB makes no differentiation in this.</p> <p>Completion statement filed with PSIT</p> <p>Sustainability - Existing staff and processes are in place</p> <p>PM – Guide 56 participant involvement requirements and expectations are in place, and are part of the G-56 assessment process. Community visits and staff awareness sessions will continue – see rec. 82 Field Surveillance. Will be changed if gov't policy changes</p>

BRANCH: FIELD SURVEILLANCE

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
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<p>25</p>	<p>Increase sour gas inspections and inform nearby residents of results</p> <p>COMPLETE and IMPLEMENTED</p> <p>Indirect links to 26, 27, 28</p>	<p>COMPLETE – Field Surv. increased the frequency of inspections and ERP assessments by modifying its OSI inspection priority system. As well, field staff contact local residents in EPZs to ensure they are aware of the company’s ERP, and review inspection results with them</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Use modified OSI inspection cycle. Have developed a public contact form/resident letter, developed FIS computer tracking system, updated list of facilities that require ERPs, have ERP assessment check sheet with corresponding enforcement action. Produce annual Field Surv. Provincial Summary</p>
<p>26</p>	<p>Increase sour gas inspections of new and non-compliant operators</p> <p>COMPLETE and IMPLEMENTED</p> <p>Indirect links to 25, 27, 28</p>	<p>COMPLETE – Field Surv. modified its OSI priority inspection system to ensure that facilities licenced to new operators were selected for a mandatory inspection. Facilities that recorded a major or serious unsatisfactory inspection are scheduled for an additional inspection.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Same as for Rec. 25 above.</p>
<p>27</p>	<p>The EUB inspect all critical sour wells near people and inform residents of the result</p> <p>COMPLETE and IMPLEMENTED</p> <p>Indirect links to 25, 26, 28</p>	<p>COMPLETE – Effective Sept. 2001, Field Surv. increased the inspection rate of critical sour wells to 100%. A resident contact form and letter were developed and all public contacts are logged into a computer tracking system. All public concerns are followed up on by Field Surv.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Conduct inspections on 100% of critical sour wells, record findings. Use resident contact form and log. Track and report number of wells inspected and results, number of public contacts and number of unsatisfactory ERPs</p>
<p>28</p>	<p>The EUB give highest priority to sour gas complaints, investigating within one day where possible.</p> <p>COMPLETE and IMPLEMENTED</p> <p>Indirect links</p>	<p>COMPLETE – EUB immediately investigates all sour gas complaints and complainants are advised of results. Upon request, field staff visit the complainant for personal follow-up.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – A random representative sampling of complainants are contacted and surveyed. Survey reports on: Percentage of complaints resolved, complainants satisfaction, percent of complainants satisfied with EUB response</p>

29	<p>EUB Field staff involvement in landowner/industry and multi-stakeholder group discussions of sour gas concerns</p> <p>COMPLETE and IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – Field staff participation with landowner/industry issues and in multi-stakeholder groups is an on-going activity. Staff also act as facilitators, attend ADR sessions and meet with local gov't to clarify roles and responsibilities.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Field surv. tracks and reports on: participation in synergy groups, number of industry and public open houses attended, number of issues facilitated, number of issues resolved, ADR mediations and manpower expended. Reported in Field Surv. Provincial Summary.</p>
65	<p>Review current monitoring response capability for sour gas releases and ensure adequate capability exists</p> <p>COMPLETE and IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – Field Surv. compiled an inventory of air monitoring equipment in Alberta (mobile & stationary), including location and capability. Reviewed 1983 Lodgepole Blowout recommendations to identify added value. Developed an air monitoring protocol for EUB staff & an air monitoring quality assurance & control (QA/QC) inspection guide</p> <p>Completion form filed with PSIT</p> <p>Sustainability - Staff and processes are in place</p> <p>PM – Update inventory and capability evaluation annually. Adopted recommendations from Lodgepole inquiry. Constantly updates its QA/QC program as new requirements and standards are identified.</p>
68	<p>Enhance EUB capability to monitor for complaint response and compliance</p> <p>COMPLETE and IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – Field Surv. purchased a second air monitoring unit and vehicle and hired trained technicians to staff the unit. Have significantly increased the number of facilities monitored each year, and will continue with this higher level of monitoring in the future.</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Track and report on levels of compliance and non-compliance annually. Report on number of facilities monitored.</p>
77	<p>Identify key operator contacts and facility locations to assist the public</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 16</p>	<p>COMPLETE - Since Rec. 16 is a GIS web site with wells, pipelines, facilities on it – plan is to link operator contacts and field centre contacts on GIS web site. This will be done via “quick links” to EUB maintained SQL database. Each Field Centre also has a list of operators and work to keep it updated. This information can be accessed by calling the Field Centre. Field staff can also access information for the public via the Field Inspection System (FIS) database and provide this information to the public verbally. NOTE: There is a “security” question around unlimited public access to the GIS web site, which may impact this rec.</p> <p>This recommendation is complete and PST is waiting on completion statement</p> <p>Sustainability - will be included in completion statement</p> <p>PM – To be developed in conjunction w/ PM's for Rec. 16</p>

78	<p>Mutual aid agreements where there are multiple operators in an area –</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 63, 77</p>	<p>COMPLETE – Field Surv. will encourage the development of multistakeholder contact groups where multiple operators exist. Where not, will use key operator contact database (Rec 77). There is an on-going plan to have operators meet to examine the need to create mutual aid agreements. A survey has been completed identifying 48 active community groups where mutual aid agreements could be developed. Field Surv. will maintain contact with the Synergy Action Team forming the synergy group umbrella org. Joint meetings are being held in sour gas areas. Field Surv. will continue encouraging the development of mutual aid agreements in the future.</p> <p>This recommendation is complete and PST is waiting on completion statement</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – This initiative will be rolled into the Field Surveillance business plan, and outcomes will be reported annually</p>
82	<p>EUB encourage better interaction between Aboriginal people, EUB and industry –</p> <p>COMPLETE and IMPLEMENTED</p> <p>Links to 14, 83, 85</p>	<p>COMPLETE - EUB field staff have visited 52 aboriginal communities, with up to 10 follow-up visits. A program is in place to visit all aboriginal communities by the end of 2004. A survey will be sent in late 2004 to gauge program effectiveness. This work is ongoing and is incorporated into Field Surveillance business plan. Will continue to use aboriginal consultant in 04/05 to further improve this program.</p> <p>This recommendation is complete and PST is waiting on completion statement</p> <p>Sustainability – budget in place for aboriginal consultant, staff and process in place</p> <p>PM – Survey will be conducted. Initiative reported upon in Field Surv. Provincial Summary</p>
85	<p>Ensure the existence of complaint and/or incident response programs for Aboriginal communities</p> <p>COMPLETE and IMPLEMENTED</p> <p>Indirect links to several rec's</p>	<p>COMPLETE – Field Surv. has hired three Aboriginal staff and provided Aboriginal awareness training to other staff. Routinely visit with Aboriginal and Metis communities throughout Alberta to explain the role of the EUB and identify issues or concerns – then follow-up to deal with those issues or concerns</p> <p>Completion form filed with PSIT</p> <p>Sustainability – Staff and processes are in place</p> <p>PM – Report on number of Aboriginal or Metis communities visited. Report on resolution of issues identified, report on results of any EUB inspections on First Nations lands.</p>

BRANCH: RESOURCES

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
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<p>16</p>	<p>EUB review and organize its sour gas data and make a database available to industry and the public –</p> <p>Ongoing, end date TBD – see note</p> <p>Links to 5, 73, 77</p>	<p>Project is split into two sub-projects: data storage and web site access. Significant progress has been made on both, work is ongoing on both. Deliverables are a set of complete, accurate, up-to-date databases that are accessible to internal and external stakeholders. An initial test rollout to selected public audiences is expected in mid-2004. Data cleanup is on going.</p> <p>Team is working on governance model. There are three pieces to be considered: Communication's web site, IT maintenance, and Resources Branch data.</p> <div style="border: 1px solid black; padding: 5px; margin-top: 10px;"> <p>Note: The RCMP, CSIS and Alberta Security Information Management (SIM) met with the EUB on May 28/04 and expressed serious concern about the security implications of allowing unlimited public access to this site – options are being examined.</p> </div>
<p>79</p>	<p>Determine local benefits from sour gas development</p> <p>COMPLETE & IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – With Advisory Committee approval, the Stakeholder Steering Committee changed the mandate to “determine the net financial benefits to communities impacted by sour gas.” This study was completed and posted on the EUB web site September 9, 2003.</p> <p>Completion statement on file with PSIT</p> <p>Sustainability – No staff or processes needed</p> <p>PM – 1) delivery of report, 2) technically sound report and 3) a report that was accepted by all stakeholder members. The report was peer reviewed and accepted by economists at UofA and UofC. Final report accepted by EUB and Advisory Committee. No further PM needed.</p>

BRANCH: LAW

Rec. #	Subject of Recommendation Ongoing or Complete Estimated End Date and Links	Action Taken and/or Current Status OR if Rec. is complete – this column outlines what was done, sustainability, deliverables and Performance Measure (PM)
<p>1, 2, 3 84</p>	<p>Coordinate involved jurisdictions regarding the impact of sour gas on public safety and ensure that overlaps are handled efficiently.</p> <p>EUB, IOGC, INAC, First Nations jurisdictional issues</p> <p>Ongoing, end date March 05</p> <p>Links to 4, 5</p>	<p>Being completed. A series of “working papers” has been drafted to clarify roles and responsibilities of some 20 organizations respecting public safety and sour gas. An executive summary is part of this document Law is now in the process of discussing initial findings with relevant stakeholders to identify gaps and examine how overlaps may be addressed</p> <p>Law has been examining First Nations jurisdictional issues and has prepared a section in the “working papers” which includes findings on the background of federal/provincial jurisdiction over “Indians and Lands Reserved for Indians,” and also includes findings on Band and Tribal Council, Indian and Northern Affairs Canada, the Indian Oil and Gas Commission, the Indian Resource Council and Metis Settlements.</p> <p>Research will continue on how to best meet the deliverable of developing a system to efficiently administer energy resource development on reserve lands in Alberta. As discussions progress with affected stakeholders, it will become more apparent what the longer-term impact will be.</p>

<p>4</p>	<p>Prepare a sour gas and public health and safety roles and responsibilities document and widely distribute it –</p> <p>Ongoing, end date March 05</p> <p>Links 1, 2, 3, 84</p>	<p>This document will be a follow-up product to rec's 1, 2, 3 and 84. Preparation began in early 2004 and will include internal and external stakeholder engagement.</p> <p>A consultant has been hired for recommendations 4 and 20. As work progresses on 1, 2, 3 and 84 an action plan will be further developed for this document. Internal and public and industry stakeholder engagement will begin in the first half of 04/05. This will need to become a sustainable document.</p>
<p>20</p>	<p>EUB consolidate to the degree possible all of its regulatory requirements related to sour gas into a single, concise document and widely distribute –</p> <p>Ongoing, end date Dec 06</p>	<p>Along with rec. 46 this is one of the last PSSG recommendations to be worked on, be completed and implemented. Cannot be completed until all related ongoing PSSG work is reasonably complete.</p> <p>A consultant has been hired for recommendations 4 and 20. The consultant is looking at best practices approaches to achieving the deliverable. Regulations are being compiled and Law Branch is meeting with a professional Indexer to examine the complexities of cross-referencing this consolidation to make the document as effective and efficient as possible. This document will need to be updated on a sustainable basis.</p>
<p>39, 40</p>	<p>Rewrite Guide 29, and make public hearings more user friendly</p> <p>COMPLETE & IMPLEMENTED</p> <p>No direct links</p>	<p>COMPLETE – Guide 29, Energy and Utility Applications and the Hearing Process has been completely re-written and publicly distributed. A companion brochure is also available. A video on how to participate in an EUB Public Hearing has also been produced, shown on television and is available to the public</p> <p>Completion form has been filed with PSIT</p> <p>Sustainability - Existing staff and processes are in place. There is recognition of future costs to update guide, video and brochure. Deliverable - Guide 29 Energy and Utility Development Applications and Hearing Process</p> <p>PM – Could be rolled into Hearing Participant interviews conducted by Applications Branch- should that direction be decided upon.</p>

END