GUIDELINES FOR THE PREPARATION OF AS-BUILT REPORTS

Saskatchewan Petroleum Industry / Government Environment Committee
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Guidelines for the Preparation of As-Built Reports

INTRODUCTION

Saskatchewan Agriculture and Food (SAF) and Saskatchewan Environment (SE) are the principal land-management and regulatory agencies which issue approvals or clearances for industrial activity on environmentally sensitive lands. Depending on the specifics of the project and the concerns it raises, these agencies often require an As-Built Report as a condition of approval.

Uncertainty regarding the function of these reports and the information that should be included in them prompted the Saskatchewan Petroleum Industry/Government Environment Committee (SPIGEC) to prepare these *Guidelines for the Preparation of As-Built Reports*. While proponents are encouraged to use this outline, the model can be modified when warranted by project details. Additionally, the level of detail provided for each topic in the report should vary according the extent to which that subject was an issue for the project being addressed.

As-Built Reports are typically prepared for use by the regulator/land manager. However, they might also be made available to affected landowners, interested members of the public and other agencies, including municipal governments. The As-Built Report should provide sufficient information on the project and its aftermath that the reader will fully understand the project and its environmental implications.

While these guidelines were designed to provide direction to the oil and gas industry, it is expected that they will be applied to other land uses and users.

WHAT ARE THE OBJECTIVES OF THE AS-BUILT REPORT?

As-Built Reports should fulfil a quality-assurance or audit function for regulators, proponents, operators and environmental consultants. The process of formally examining project assessment, mitigation and execution – what effects were anticipated, what was proposed as mitigation, what worked and what did not – provides an important learning opportunity and should help improve environmental planning and management of projects. Improved environmental performance will, in turn, minimize possible environmental impacts and economic costs, including operating delays, reclamation costs and regulatory assessment of future projects. It should also help allay any public concerns associated with development in sensitive areas.

WHO SHOULD PREPARE THE AS-BUILT REPORT?

Preparation of the As-Built Report is the responsibility of the proponent, but is typically completed by the Environmental Monitor(s) who would normally be present when the project was occurring. The monitor's qualifications should be presented in the report (see also SPIGEC Guideline No. 6 – *Required Qualifications; Field Environmental Monitors for Oil and Natural Gas Exploration and Development Projects*).

WHEN SHOULD THE AS-BUILT REPORT BE COMPLETED?

Unless otherwise approved in writing by the agency requiring the report, any requested as-built report shall be submitted:
-within 60 days of seismic project completion
-within 60 days of well completion activities, but no later than 120 days from the start of drilling
-within 60 days of completion of pipeline/flowline testing.

As required, the proponent must respond to any follow-up information requests from government.

INFORMATION TO BE INCLUDED IN THE AS-BUILT REPORT - OVERVIEW

As-Built Reports should follow the general structure of the original Project Proposal or Environmental Protection Plan (EPP). They should describe the environment in the project area, and provide key project details, clearly indicating what was planned, what actually happened, what changed and why. The project's environmental effects should be identified, as should any required work to complete mitigation or environmental protection activities. Ongoing requirements such as cleanups and reclamation should be identified and the necessary commitments made. Finally, the As-Built Report should complete the audit process by identifying the "lessons learned" as a step towards improved environmental performance on future projects.

CONTENTS OF THE AS-BUILT REPORT

The As-Built Report should be a free-standing document, with sufficient detail on the project being addressed to allow the reader a full understanding without referencing the Project Proposal or EPP. Pictures (before, during and after) should be used to enhance written documentation.

INTRODUCTION

The introduction should provide brief background information, including project name, geographic area, proponent and schedule. Enough information should be provided to allow the reader to fully understand the project. Background documentation should be referenced (Project Proposal, EPP) and the role played by and identity of the environmental monitor (if required) should be included.

All aspects of the project should be addressed in the As-Built Report.

PROJECT DESCRIPTION

- project name;
- file number(s);
- brief project description;
- land location(s);
- Project Proposal / EPP and approval dates;
- overview of the principal environmental sensitivities or concerns identified (e.g., endangered species, terrain, sensitive soils, streams and wetlands, nesting birds).

HOW THE PROJECT WAS UNDERTAKEN

- the start and completion dates;
- scheduling changes;
- when and where start-up meetings took place and who attended;
- weather conditions during the project;
- detailed information on how the project proceeded, in comparison to the description within the Project Proposal / EPP. For example, were seismic lines shortened or cancelled, were all the proposed wells drilled, were all pipelines installed, etc.?
- key mitigative and environmental protection measures applied during project completion. Describe and evaluate planned and unplanned mitigation - how successful were these measures in meeting environmental protection objectives? Where planned mitigation was ineffective, the As-Built Report should explain why, and report changes that were made. What was the role of regulators / land managers in making changes?
- problems that occurred, and how they were dealt with;
- dates/times when the Environmental Monitor was present and which project components were monitored. Personnel changes should be noted;
- number and volume of trees harvested or cut during the project should be noted if the project was in the provincial forest. A harvest tally sheet and volume tables provided by Saskatchewan Environment should be used.

RESTORATION COMPLETED AND REQUIRED

- what environmental impacts resulted from the project (e.g., vegetation removal, spills, surface disturbance, altered drainage, impacts on rare species)? Impacts anticipated in the Project Proposal / EPP and those that were not anticipated should be described;
- describe restoration that has been completed (e.g., spill cleanup, recontouring, erosion control). Revegetation efforts, including seed mixes used, whether seed certificates were obtained, and reseeding should be described.

NEXT STEPS

- what additional restoration is required? Appropriate commitments are to be provided;
- follow-up monitoring requirements and commitments are to be included.

CONCLUSIONS - LESSONS LEARNED / IMPROVEMENTS

- what improvements that can be applied to future projects to minimize impacts?