

## **Notice of Proposed Directive Amendments: *Directive PNG014: Incident Reporting Requirements***

### **Background**

The Ministry of Energy and Resources (ER) is consulting with the oil and gas industry on proposed amendments to *Directive PNG014: Incident Reporting Requirements* (the amended directive). The featured changes are intended to support more timely and accurate reporting of incident impacts and to strengthen regulatory oversight of spill impact mitigation efforts.

### **The Process**

ER is launching industry consultations on the amended directive from April 25, 2024 to June 6, 2024. Once the consultation period has concluded, ER will review all consultation feedback in the preparation of a final draft of the amended directive. The amended directive is expected to come into effect in summer 2024.

### **Summary of Proposed Changes**

The main proposed changes in the amended directive will require more information about an incident sooner in the incident response process to support more accurate and timely assessment of spill impacts and to enhance ER's oversight over incident responses. The directive's current requirements for incident information reporting in ER's Integrated Resource Information System (IRIS) do not always provide a complete picture of spill impacts extending beyond a well or facility site, the area also known as the lease operating area. Also, existing reporting timelines may hinder timely mitigation efforts relating to incident impacts outside the lease operating area, sometimes causing delays in understanding the magnitude of spills and associated clean-up costs.

To address these issues, the amended directive will define the "operating area" of a lease to distinguish incidents that fall within and outside this area to more precisely determine spill impacts and the application of the criteria in ER's site remediation and reclamation directives. Key changes relating to post-incident reporting in IRIS will also require:

- all incidents in Appendix 1 of the directive to be reported in IRIS within two business days of occurrence (instead of the current five business days) with estimates on the type and volume of the substance spilled and the areas on/off lease and on/off the operating area impacted (presently required as part of the 90-day detailed incident report);
- details on efforts to remediate and reclaim sites impacted by a spill to be provided to ER within 90 days of the incident through an IRIS update and written report (at present, such information is to be submitted to ER within six months of final reclamation);
- a report at six months from the date of the initial incident submission to update ER on the reclamation status if an incident has not been closed by 90 days; and,
- new status updates in IRIS on the progress of remediation and reclamation activities.

**Miscellaneous items of note**

- Added clarity on the operator's responsibilities in the incident response process;
- Expanded notification requirements for stakeholders potentially impacted by an incident, including Indigenous organizations;
- Clarification on incident reporting exemptions for wells in potash mine sites and pipelines regulated by the Canada Energy Regulator;
- Linkages to applicable ER directives to follow for proper remediation and reclamation of sites impacted by incidents; and,
- Incorporation of reporting procedures regarding releases of drilling fluids from horizontal directional drilling for pipeline construction (previously outlined in ER Bulletin [BT2019-008](#)).

**Review of Draft Directive**

ER is seeking written comments on the proposed amendments outlined in a side-by-side document attached to this notice as Appendix A. Please direct any comments or questions about the proposed amendments to:

ER Service Desk at [er.servicedesk@gov.sk.ca](mailto:er.servicedesk@gov.sk.ca)

Attn: Ken Kowal, Director of Field Operations  
Field Services Branch

The deadline for submitting written comments is June 6, 2024.

## APPENDIX A: Changes to *Directive PNG014: Incident Reporting Requirements*

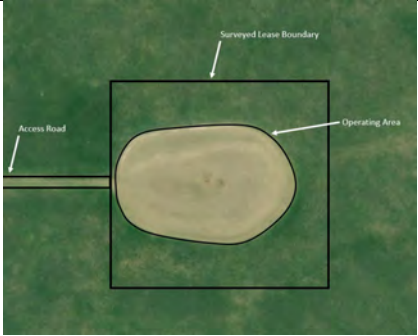


Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p><b>1. Introduction</b></p> <p>This Directive sets out the requirements of the Saskatchewan Ministry of Energy and Resources (ER) for regulating the reporting of spills and other incidents in relation to wells, facilities, flowlines and pipelines. It provides a listing of what constitutes a reportable incident and details of when and how an incident should be reported.</p> <p>Questions on Directive PNG014 can be directed to the ER Service Desk at 1-855-219-9373 or <a href="mailto:ER.servicedesk@gov.sk.ca">ER.servicedesk@gov.sk.ca</a>.</p>	<p><b>1. Introduction</b></p> <p>This Directive sets out the requirements of the Saskatchewan Ministry of Energy and Resources (ER) for regulating the reporting of incidents in relation to wells, facilities, flowlines and pipelines. It provides a listing of what constitutes a reportable incident and details of when and how an incident should be reported.</p> <p>This Directive applies to incidents related to oil and gas wells, flowlines, pipelines and facilities as well as all other well installations and associated facilities including but not limited to geothermal, lithium, helium, potash exploratory wells and hydrogen, which are also regulated by ER.</p> <p>Questions concerning the requirements set out in this Directive should be directed to the ER Service Desk at 1-855-219-9373 or email at <a href="mailto:ER.servicedesk@gov.sk.ca">ER.servicedesk@gov.sk.ca</a>.</p>	<p>Updated wording for clarity and consistency with other directives.</p> <p>New paragraph two provides clarity to the scope of this directive.</p>
<p><b>1.1 Governing Legislation</b></p> <p>The requirements outlined in this Directive are based on <i>The Oil and Gas Conservation Act</i> (OGCA), <i>The Pipelines Act, 1998</i> (PA), <i>The Oil and Gas Conservation Regulations, 2012</i> (OGCR) and <i>The Pipelines Regulations, 2000</i> (PR).</p> <p>Please note that section 4.4 of this Directive deals with the immediate remediation and, where necessary, reclamation of land subject to an incident. Final reclamation of an abandoned well site or facility site is governed by the requirements of <i>Directive PNG016: Acknowledgement of Reclamation Requirements</i>. Operators should consult <i>Directive PNG016</i> to understand the difference between incident reclamation and final reclamation.</p>	<p><b>2. Governing Legislation</b></p> <p>The requirements in this Directive are authorized under and supplemented by:</p> <ul style="list-style-type: none"> <li>• <i>The Oil and Gas Conservation Act</i> (OGCA)</li> <li>• <i>The Oil and Gas Conservation Regulations, 2012</i> (OGCR)</li> <li>• <i>The Pipelines Act, 1998</i> (PA)</li> <li>• <i>The Pipelines Administration and Licensing Regulations</i> (PALR)</li> <li>• Associated Directives and Guidelines: <ul style="list-style-type: none"> <li>• <i>Directive PNG001: Facility Licence Requirements</i> (Directive PNG001)</li> <li>• <i>Directive PNG016: Acknowledgement of Reclamation (AOR) Requirements</i> (Directive PNG016)</li> <li>• <i>Directive PNG018: Detailed Site Assessment Requirements</i> (Directive PNG018)</li> <li>• <i>Directive PNG033: Phase II Environmental Site Assessment</i> (Directive PNG033)</li> <li>• <i>Directive PNG034: Saskatchewan Pipelines Code</i> (Directive PNG034)</li> <li>• <i>Directive S-01: Saskatchewan Upstream Petroleum Industry Storage Standards</i> (Directive S-01)</li> <li>• <i>Guideline 97-02: Guideline for the Application of Oily Byproducts to Municipal Roads in Saskatchewan</i> (GL 97-02)</li> </ul> </li> </ul>	<p>Updated format for clarity.</p> <p>Added in the following directives and guidelines associated with incident reporting and site remediation and reclamation:</p> <ul style="list-style-type: none"> <li>• Directive PNG001</li> <li>• Directive PNG016</li> <li>• Directive PNG018</li> <li>• Directive PNG033</li> <li>• Directive PNG034</li> <li>• Directive S-01</li> <li>• GL 97-02</li> <li>• GL 99-01</li> <li>• GL 2000-01</li> </ul>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
	<ul style="list-style-type: none"> <li>Guideline 99-01: Saskatchewan Drilling Waste Management Guideline (GL 99-01)</li> <li>Guideline 2000-01: Saskatchewan Hydraulic Fracturing Fluids and Propping Agents Containment and Disposal Guidelines (GL 2000-01)</li> </ul>	
<b>1.2 Notice to Operators</b> This Directive supersedes and replaces the requirements related to incident notification and reporting set out in: <ul style="list-style-type: none"> <li>Sections 20 and 21 of the PR; and</li> <li>Subsection 62(5) and section 99 of the OGCR.</li> </ul>	<b>REPEALED</b>	This section may be repealed as it references incident reporting requirements in other regulations that have been repealed since the existing version of Directive PNG014 took effect in 2018.
<b>1.1 Definitions</b>  <b>Blow-out:</b> means a blow-out as defined in the OGCR.  <b>Certified third-party environmental reclamation professional:</b> means a professional with qualifications as defined in <i>Directive PNG016: Acknowledgement of Reclamation Requirements</i> .  <b>Condensate:</b> means a condensate as defined in the OGCR.  <b>Emergency Response Plan or ERP:</b> means an emergency response plan as defined in the OGCR or an emergency procedures manual described in section 14 of the PR.  <b>Emulsion:</b> means a mixture of two immiscible substances: a non-polar phase consisting of hydrocarbons such as crude oil or condensate, and a polar phase consisting of water or salt water. One substance (the dispersed phase) is dispersed in the other (the continuous phase).  <b>Field office:</b> means the ER regional office responsible for a geographic area as shown in Appendix 2.  <b>Fire:</b> means any unplanned fire or explosion at any well, facility, pipeline or flowline.  <b>Flowline:</b> means a flowline as defined in the PA.	<b>3. Definitions</b>  <b>Blow-out:</b> Means a blow-out as defined in the OGCR.  <b>Break, Pipeline:</b> Means any escape of substance from the pipeline which immediately impacts the operability of the pipeline system.  <b>Condensate:</b> Means condensate as defined in the OGCR.  <b>Contact Damage:</b> Means an event from external activity that results in damage to the line pipe, coating systems, protections or any component but does not result in the release of any substance.  <b>Emergency Response Plan (ERP):</b> Means an ERP as defined in Directive PNG001.  <b>Emulsion:</b> Means a mixture of two immiscible substances: a non-polar phase consisting of hydrocarbons such as crude oil or condensate, and a polar phase consisting of water or salt water. One substance (the dispersed phase) is dispersed in the other (the continuous phase).  <b>Facility:</b> Means a facility as defined in <i>Directive PNG001</i> .  <b>Field Office:</b> Means the ER regional office responsible for a geographic area as shown in Appendix 3.  <b>Fire:</b> Means any unplanned fire or explosion at any well, facility or pipeline.  <b>Flowline:</b> Means a flowline as defined in the PA.	Updated section number.  Removed definitions for: <ul style="list-style-type: none"> <li>Certified third party environmental reclamation professional</li> <li>Regulatory Closure</li> <li>Spill</li> </ul> Definitions added: <ul style="list-style-type: none"> <li>Contact Damage</li> <li>Break, Pipeline</li> <li>Facility</li> <li>Leak, Pipeline</li> <li>Operating Area</li> <li>Pipeline Associated Equipment Release</li> <li>Unrefined</li> </ul>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p><b>Kick:</b> means a controlled diversion of gases from a wellbore to a rig tank or flare system during drilling, workover, or completion activities.</p> <p><b>Licensed pipeline:</b> means a pipeline licensed pursuant to the PA.</p> <p><b>Natural gas liquids:</b> means ethane, propane, butane and pentanes-plus, or any combination of these substances.</p> <p><b>Off-lease:</b> means any location that is not on-lease.</p> <p><b>Oil:</b> means oil as defined in the OGCR.</p> <p><b>On-lease:</b> means:</p> <ol style="list-style-type: none"> <li>the area of a well or facility site that is surrounded by a berm or a dike or that is within a contoured area so that any release of liquid, semi-solid or solid is contained within the described area.</li> <li>if a dike or contoured area does not exist, the surveyed boundary of the surface lease for the well site or facility site; or</li> <li>a pipeline terminal.</li> </ol> <p><b>Operator:</b> means:</p> <ol style="list-style-type: none"> <li>an operator of a well or facility as defined in the OGCR.</li> <li>an operator of a pipeline, including a flowline, as defined in the PR.</li> </ol> <p><b>Pipeline:</b> means a pipeline as defined in the PA.</p> <p><b>Pipeline Terminal:</b> means the area within the surveyed boundary of land leased or owned by a licensed pipeline operator on which a pipeline terminal resides as it relates to, is incidental to, or used in connection with a licensed pipeline.</p> <p><b>Product:</b> means a product of oil and gas as defined in the OGCA.</p>	<p><b>Kick:</b> Means a controlled diversion of gases from a wellbore to a rig tank or flare system during drilling, workover, or completion activities.</p> <p><b>Leak, Pipeline:</b> Means any escape of substance from the pipeline which does not immediately impact the operability of the pipeline system.</p> <p><b>Licensed pipeline:</b> Means a pipeline licensed pursuant to the PALR.</p> <p><b>Natural gas liquids:</b> Means ethane, propane, butane and pentanes-plus, or any combination of these substances.</p> <p><b>Off-lease:</b> Means any location that is not on-lease. Access roads are considered off-lease for purposes of this Directive.</p> <p><b>Oil:</b> Means oil as defined in the OGCR.</p> <p><b>Oilfield Waste:</b> Includes but is not limited to drilling fluids, waste oil or refuse from tanks or wells.</p> <p><b>On-lease:</b> Means any area within the surveyed lease boundary, excluding access roads.</p> <p><b>Operating area:</b> Means the area of a well or facility site, excluding lease roads, within the surveyed lease boundary that:</p> <ol style="list-style-type: none"> <li>is the area surrounded by and including a berm or a dike or that is within a contoured area to contain any released liquid, semi-solid or solid that is contained within the described area as shown in section 6, <i>Figure 1</i>.</li> <li>in areas where a dike or contoured area does not exist, is the actively maintained area for field operations distinct from the surrounding environment as demonstrated in section 6, <i>Figure 2</i>.</li> <li>In cases where there is no maintained area or above ground infrastructure with distinct maintained area that differs from the surrounding area, is the area within a 10-meter buffer around the infrastructure as shown in section 6, <i>Figure 3</i>.</li> </ol> <p><b>Operator:</b> Means:</p> <ol style="list-style-type: none"> <li>an operator of a well or facility as defined in the OGCR.</li> </ol>	<p>New definition for “Operating Area” to support the addition of new Section 6: Lease and Operating Area to help distinguish between “on-lease” and “off-lease” areas to more precisely determine spill impacts and the application of the remediation and reclamation criteria in ER’s Liability Management (LM) directives.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p><b>Refined chemical:</b> means any substances designated as a hazardous substance or a waste dangerous good pursuant to <i>The Hazardous Substances and Waste Dangerous Goods Regulations</i>.</p> <p><b>Regulatory closure:</b> means the later of the date that the applicable reclamation criteria are met by the licensee or the date that the reclamation actions were approved by ER.</p> <p><b>Salt water or Produced water:</b> means formation water produced in association with crude oil or natural gas or any fluid that does not meet the criteria of unrestricted discharge as per Appendix 3 of <i>Directive S-01: Saskatchewan Upstream Petroleum Industry Storage Standards</i>.</p> <p><b>Spill:</b> is the unintentional release of any substance, fluid, gas, semi-solid or solid.</p>	<p>b) an operator of a pipeline, including a flow line, as defined in the PR.</p> <p><b>Pipeline:</b> means a pipeline as defined in the PALR.</p> <p><b>Pipeline Associated Equipment:</b> Means any equipment associated with a pipeline (i.e., riser, pig senders/receivers, etc.).</p> <p><b>Pipeline Terminal:</b> Means the area within the surveyed boundary of land leased or owned by a licensed pipeline operator on which a pipeline terminal resides as it relates to, is incidental to, or used in connection with a licensed pipeline.</p> <p><b>Product:</b> Means a product of oil and gas as defined in the OGCA.</p> <p><b>Refined chemical:</b> Means any substances designated as a hazardous substance or a waste dangerous good pursuant to <i>The Hazardous Substances and Waste Dangerous Goods Regulations</i>.</p> <p><b>Release:</b> Means the unintentional escape of any substance, fluid, gas, semi-solid or solid</p> <p><b>Salt water or Produced water:</b> Means water produced in association with crude oil, natural gas or any non-hydrocarbon-based development that does not meet the criteria of unrestricted discharge as per Appendix 3 of <i>Directive S-01</i>.</p> <p><b>Well:</b> Means a well as defined in the OGCR, including geothermal, lithium, helium, potash exploration and hydrogen wells.</p> <p><b>Unrefined:</b> Substances that are produced directly from a well that have not yet been refined. This does not include the separation of produced water from oil.</p>	<p>Clarity added that “well” as defined in the OGCR includes wells for other mineral/energy commodities besides oil and gas.</p>
<p><b>1.2 Potash Wells Exemption</b></p> <p>This Directive does not apply to licensed wells associated with a potash mine site that has been permitted by the Ministry of Environment (ENV). These wells include the following:</p> <ul style="list-style-type: none"> <li>• Brine Injection wells;</li> <li>• Slurry Production wells;</li> <li>• Brine Disposal wells;</li> </ul>	<p><b>5. Exemptions</b></p> <p><b>5.1 Canada Energy Regulator Managed Pipelines</b></p> <p>Pipelines that are regulated by the Canada Energy Regulator are exempt from reporting requirements and standards of this Directive.</p> <p><b>5.2 Potash Exemption</b></p>	<p>New sections and subsections added for all exemptions. Featured is a new exemption for pipelines regulated by the Canada Energy Regulator. Also, clarification is provided on exemptions for wells and facilities licensed by ER but situated within potash mine sites administered by the Ministry of Environment.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<ul style="list-style-type: none"> <li>• Shaft wells; and</li> <li>• Freeze holes.</li> </ul> <p>The exemption of these wells from this Directive is only for the purpose of reporting incidents. All other requirements under the OGCR relating to these wells must still be met.</p> <p>This exemption does not apply to stratigraphic test wells or grout wells.</p> <p>Incidents relating to the wells listed above are to be reported to ENV by calling the 24-hour Spill Control Centre at 1-800-667-7525.</p>	<p>This Directive does not apply to ER-licensed wells and facilities associated with a potash mine site area. Potash mine sites are areas used for active operations, such as the Mill/Refinery, the Mill Terrace Tailings Management Area and the Impacted Soil Storage Area. In the case of mines that produce potash through solution mining using wells, the mine site area includes additional areas such as the well pads and storage. The Ministry of Environment (ENV) oversees permitting and financial guarantees in relation to potash mine sites, which include any wells and facilities within that area.</p> <p>The following well types are exempted from this Directive:</p> <ul style="list-style-type: none"> <li>• Brine Injection wells;</li> <li>• Slurry Production wells;</li> <li>• Brine Disposal wells;</li> <li>• Shaft wells; and/or</li> <li>• Freeze holes.</li> </ul> <p>The exemption of these wells from this Directive is only for the purpose of reporting incidents. All other requirements under the OGCR relating to these wells must be met.</p> <p>This exemption does not apply to potash exploration wells or to areas outside of a potash mine site area where a financial guarantee has not been provided to ENV.</p> <p>Incidents relating to the wells listed above are to be reported to ENV by calling the 24-hour Spill Control Centre at 1-800-667-7525.</p>	
<b>N/A - NEW</b>	<p><b>6. Lease and Operating Area</b></p> <p>On-lease refers to any area contained within the surveyed lease boundaries. This differs from an operating area, which is the designated area within a well or facility site engineered to contain any released liquid, semi-solid, or substances within its boundaries, distinct from the surrounding environment. In cases where an operating area that differs from the surroundings is not established, the operating area is considered to be the area within a 10-meter buffer around any above-ground infrastructure. The figures below illustrate various examples of operating areas for well and facility sites.</p>	New section created to provide examples of an “operating area” in relation to the lease area as per the new definition for clarity.

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
	<div></div> <p><b>Figure 1:</b> This example illustrates an operating area within the surveyed lease boundaries for a developed well site. In such cases, incidents occurring outside the operating area (contoured clay pad), but within the surveyed lease boundaries, must be remediated according to the criteria outlined in Directive PNG033.</p> <div></div> <p><b>Figure 2:</b> In this context, the operating area of the facility site is identical in size to the surveyed lease boundaries.</p> <div></div> <p><b>Figure 3:</b> This is an example of an operating area in the context of a minimal disturbance site where there is no maintained area that differs from the area surrounding it. In this scenario, the operating area is the area within a 10-meter buffer surrounding the above-ground infrastructure.</p>	



Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p><b>2. Incident Response Overview</b>  <b>2.2 Incident Response Process</b></p> <p>An operator must carry out the following actions in relation to any of the listed incidents:</p> <ol style="list-style-type: none"> <li>1. NOTIFY ER in accordance with the requirements of this Directive;</li> <li>2. ACTIVATE its ERP where required and take immediate steps to resolve the incident;</li> <li>3. REMEDIATE or, where necessary, reclaim the affected area to the satisfaction of ER officials; and,</li> <li>4. SUBMIT detailed information and reports in the Integrated Resource Information System (IRIS) on the incident and the actions taken to resolve the matter.</li> </ol> <p>Appendix 3 shows a flow chart of the incident response reporting process and timelines. Once an operating event occurs, the operator must first determine whether it is an incident subject to this Directive (see Appendix 1). If it is a reportable incident the operator must implement its ERP and provide immediate telephone notification where required by this Directive (see section 3.1). In addition, the operator is required to submit a notification in IRIS within five (5) business days (see section 3.2) and a detailed incident report in IRIS within 90 days (see section 3.3). Depending on the nature of the incident, the operator may be required to submit an incident reclamation report (section 4.4, 4.5 and 4.6) or a metallurgical report (section 4.7).</p>	<p><b>7. Incident Response Overview</b>  <b>7.1. Incident Response Process</b></p> <p>An operator must carry out the following actions in relation to any of the incidents listed in Appendix 1:</p> <ol style="list-style-type: none"> <li>1. <b>TERMINATE/ISOLATE/CONTROL</b> the source of the incident;</li> <li>2. <b>CONTAIN</b> the contaminant to prevent further damage.</li> <li>3. <b>ACTIVATE</b> its ERP where required and take immediate steps to resolve the incident;</li> <li>4. <b>NOTIFY</b> ER in accordance with the requirements of this Directive. Notify other jurisdictions that the incident may affect after discussion with ER;</li> <li>5. <b>REMEDiate</b> or, where necessary, reclaim the affected area to the satisfaction of ER officials; and,</li> <li>6. <b>SUBMIT</b> detailed information and reports in the Integrated Resource Information System (IRIS) on the incident based on the requirements of this Directive.</li> </ol> <p>Appendix 5 shows a flow chart of the incident response reporting process and timelines. Once an operating event occurs, the operator must first determine whether it is an incident subject to this Directive (see Appendix 1). If it is a reportable incident the operator must implement its ERP and provide immediate telephone notification where required by this Directive (see section 7.2.1). In addition, the operator is required to submit a notification in IRIS within two (2) business days (see section 7.2.2) and a detailed incident report in IRIS within 90 days (see section 8.1). Depending on the nature of the incident, the operator may be required to submit a written incident report (section 8.1, 8.2, 8.3 and 8.4) or a root cause analysis report (section 12).</p>	<p>Section numbers updated.</p> <p>Updates to provide more direction upon discovering an incident, getting it under control and then notifying ER of details for Ministry personnel's information on the status and impact of the incident. Reworded some points to provide clarity.</p>
<p><b>3. Initial Incident Notification</b>  <b>3.1 Immediate Telephone Notification by Operator</b></p> <p>An operator is required to immediately notify ER's Emergency Support line at 1-844-764-3637 of the discovery of any incident listed in Appendix 1 except for the following types of incidents:</p> <ul style="list-style-type: none"> <li>• Contact damage to a flowline or pipeline that does not result in a break or leak; or</li> <li>• Any on-lease release of oil, condensate, emulsion or salt water that is less than 10.0 m<sup>3</sup>.</li> </ul>	<p><b>7.2 Initial Incident Notification</b>  <b>7.2.1 Immediate Telephone Notification</b></p> <p>An operator is required to notify ER's 24-hour Emergency Support line at 1-844-764-3637 or to notify the appropriate Field Office of any incident listed in Appendix 1 immediately after finding an incident. ER personnel must receive a verbal notification; a voicemail or email is not a sufficient notification. Exceptions to immediate telephone notification are:</p> <ul style="list-style-type: none"> <li>• Contact damage to a flowline or pipeline that does not result in a break or leak;</li> </ul>	<p>Combined existing sections 3.1 and 4.1 for clarity.</p> <p>Additions clarify that immediate verbal reporting of incidents is mandatory once the situation is brought under control and that using voicemail or email notifications alone is inadequate for notifying ER about incidents listed in Appendix 1. Note that spills originating within an operating area that subsequently extend beyond its boundaries are also subject to verbal notification to ER.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p>On-lease releases or contact damage that are exempt from immediate telephone notification still require ER notification using IRIS in accordance with section 3.2.</p> <p><b>Note:</b> <i>The Emergency Support line is available 24 hours per day, seven days per week. Operators are to call this number as soon as they discover an incident subject to immediate telephone notification.</i></p> <p><b>4.1 Immediate Telephone Notification</b></p> <p>The following information is required when providing immediate telephone notification of an incident:</p> <ul style="list-style-type: none"> <li>• The name and contact information of parties involved in the incident (e.g., well owner, well operator, contractor, etc.);</li> <li>• A description of the incident and location (LSD-SEC-TWP-RGE-M);</li> <li>• The substance(s) involved in the incident;</li> <li>• The action undertaken to mitigate the incident;</li> <li>• Has an ERP been triggered?</li> <li>• Have emergency services been notified or are enroute?</li> <li>• Are any injuries/fatalities known to have occurred in connection with the incident? (not necessary to provide any personal information);</li> <li>• Is the incident known to have affected a significant water body (i.e. lake, river, stream or slough)?</li> <li>• Is the incident known to have impacted any wildlife?</li> <li>• Has the incident occurred on First Nation reserve lands?</li> <li>• Has the incident resulted in the evacuation of the local area or notification to residents to stay indoors?</li> <li>• Does the incident involve fire of free phase product not yet contained?</li> <li>• Is an incident command required?</li> </ul> <p>Please note that providing ER with information relating to the above bullet list does not absolve an operator of their</p>	<ul style="list-style-type: none"> <li>• Any release of oil, condensate, emulsion or salt water that is less than 10.0 m<sup>3</sup> and completely contained within the operating area. If a release is discovered within the operating area and migrates outside the operating area after discovery, verbal notification is required.</li> <li>• Non-critical drilling fluid releases from Horizontal Directional Drilling (HDD) for Pipeline Construction as referenced in section 7.5.</li> </ul> <p>Releases that are exempt from immediate telephone notification still require an ER notification through IRIS in accordance with section 7.2.2.</p> <p>The following information is required when providing immediate telephone notification of an incident:</p> <ul style="list-style-type: none"> <li>• The name and contact information of parties involved in the incident (e.g., well owner, well operator, contractor, etc.);</li> <li>• A description of the incident and location (LSD-SEC-TWP-RGE-M);</li> <li>• Licence number of the location;</li> <li>• A description of the incident site and any land use conditions (i.e.: First Nations land) or sensitivities (i.e.: provincial park land);</li> <li>• List of parties that have been notified or will be notified of the incident (i.e. other jurisdictions, landowners, First Nations Reserves)</li> <li>• The substance(s) and volumes involved in the incident;</li> <li>• The action undertaken to mitigate the incident;</li> <li>• The status of the ERP and necessity for incident command;</li> <li>• The status of emergency services (where applicable);</li> <li>• If there has been a fire;</li> <li>• A description of any injuries, property damage or fatalities known to have occurred in connection with the incident (it is not necessary to provide any confidential personal information);</li> <li>• A description of immediate or potential impacts to a waterbody (i.e. lake, river, stream, wetland or fish-bearing waterbody);</li> <li>• A description of immediate or potential impacts to any other environmentally sensitive areas;</li> <li>• A description of immediate or potential impacts to wildlife and migratory birds;</li> </ul>	<p>Added in the additional details to be included in IRIS reporting to provide Ministry personnel with information on the status and impact of the incident as well as some rewording to improve clarity.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
responsibility to also notify the proper authorities in accordance with other regulations or as required pursuant to their ERP.	<b>Note:</b> Providing ER with information relating to the above bullet list does not absolve an operator of their responsibility to also notify the proper authorities in accordance with other regulations or as required pursuant to their ERP.	
<p><b>3.2 IRIS Notification by Operator</b></p> <p>All incidents listed in Appendix 1 must be promptly reported in IRIS not later than five (5) business days after the discovery of the incident. This requirement is in addition to the requirement for immediate telephone notification as set out in subsection 3.1.</p> <p><i>Note: Operators reporting incidents into IRIS are responsible for the detailed incident reporting as outlined in section 4.3 and incident reclamation reporting as outlined in section 4.4 unless the well site, facility site or pipeline is transferred to another party. Once an incident is recorded in IRIS, the operator must comply with reporting requirement timelines set out in this Directive as established from the date of discovery.</i></p> <p><b>7.2 Initial Incident Notification in IRIS</b></p> <p>Within five (5) business days of the discovery of incident, an operator must submit the following information in IRIS:</p> <ul style="list-style-type: none"> <li>• The name of the ER Field Office responsible for the geographic area in which the incident occurred (see map in Appendix 2);</li> <li>• The date the incident occurred (if known);</li> <li>• The date the incident was discovered;</li> <li>• Information on whether the ERP was initiated and whether the field office was notified;</li> <li>• Information on whether any substances were spilled or released;</li> <li>• Information on whether a reclamation report is required for the incident (see section 4.4);</li> <li>• A brief description of the incident;</li> </ul>	<p><b>7.2.2 IRIS Notification</b></p> <p>An operator is responsible for reporting all incidents listed in Appendix 1 in IRIS including the required information listed below no later than two (2) business days after finding an incident. This requirement is in addition to the requirement for immediate telephone notification as set out in subsection 7.2.1.</p> <ul style="list-style-type: none"> <li>• The name of the ER Field Office responsible for the geographic area in which the incident occurred (see map in Appendix 3);</li> <li>• The date the incident occurred (if known);</li> <li>• The date the incident was found.</li> <li>• Incident Type</li> <li>• Information on whether the ERP was initiated and whether the Field Office was notified;</li> <li>• Information on whether any substances were spilled or released;</li> <li>• A brief description of the incident;</li> <li>• The name, job title, business phone number and email address of the contact responsible for dealing with the incident;</li> <li>• The name and contact information of the stakeholders and/or parties notified or that will be notified of the incident;</li> <li>• The surface location of the incident (LSD-SEC-TWP-RGE-M);</li> <li>• Surface coordinates (latitude and longitude, in decimal degrees) described in accordance with North American Datum 83 (NAD83) with the zone indicated. This must be the physical location of the origin of the incident, not well center of the licence the incident is associated with;</li> <li>• Information about any surface water impacted by the incident and the type of surface water affected;</li> <li>• Disclosure of any reportable concentration of hydrogen sulphide (H<sub>2</sub>S) released and if there have been any public complaints related to H<sub>2</sub>S as a result of this incident (if known);</li> <li>• The estimated size of the spill (m<sup>2</sup>) and the percentage on/off-lease and/or percentage on/off the operating area;</li> <li>• The estimated substance type and amount of substance spilled or released (m<sup>3</sup>); and,</li> <li>• The source of the incident and licence identifier.</li> </ul>	<p>Existing sections 3.2 and 4.2 have been combined for clarity and simplicity.</p> <p>All incidents listed in Appendix 1 of Directive PNG014 are now to be reported in IRIS within <u>two</u> business days of occurrence instead of the current five business days. Also, additional information on an incident is required to be provided as part of the initial IRIS notification. Having more information about a spill or other incident earlier in the incident response process will assist ER in determining its level of involvement in the incident response going forward.</p> <p>Adding points for H<sub>2</sub>S disclosure to align with IRIS.</p> <p>Updating requirements to now include an estimated area impacted and volume included during initial incident reporting to better track incidents in IRIS</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<ul style="list-style-type: none"> <li>The name of the company contacts, their job title, business phone number and email address who is responsible for dealing with the incident;</li> <li>The surface location of the incident (LSD-SEC-TWP-RGE-M);</li> <li>Surface coordinates (latitude and longitude, in rads or degrees) described in accordance with North American Datum 83 (NAD83) with the zone indicated; and</li> <li>Information about any surface water impacted by the incident and the type of surface water affected.</li> </ul>	<p><b>Note:</b> Operators reporting incidents into IRIS are responsible for the detailed incident reporting and the written reporting as outlined in section 6.1 unless the well site, facility site or pipeline is transferred to another party. Once an incident is recorded in IRIS, the operator must comply with reporting requirement timelines set out in this Directive as established from the date of submission.</p>	<p>before the 90-day report. These can be updated during the 90-day reporting.</p>
<b>N/A – NEW</b>	<p><b>7.3 Stakeholder Notification</b></p> <p>Landowners, Crown Land representatives, Indigenous organizations or any stakeholders impacted by the release are to be notified immediately of an incident that occurs and impacts outside of the operating area.</p> <p>If the incident impacts a fish bearing waterbody or migratory birds the operator responsible for the incident must notify ENV immediately via ENV’s 24-hour Spill Control Centre at 1-800-667-7525.</p>	<p>This new section was created to provide clarity and expectations for incidents with impacts outside of operating areas as per the new definition. It is the operator’s responsibility to notify potentially affected Indigenous communities and stakeholders of an incident.</p>
<p><b>3.3 Notification by Person Other than an Operator</b></p> <p>If a spill or other incident occurs while a product or waste is being transported, the owner of the product or waste must report the incident in accordance with section 3.1 and 3.2.</p> <p>In the event of an incident of unknown origin, any person who witnesses or has information on the incident may provide notification to the Emergency Support line at 1-844-764-3637.</p>	<p><b>7.4 Incident During Transportation</b></p> <p>The operator is responsible for safe transportation of unrefined fluids to the point of sale or custody transfer.</p> <p>If a release or other incident occurs while a product or waste is being transported, the owner of the product or waste must report the incident in accordance with section 7.2.</p> <p>If a fluid release occurs, the operator must implement the incident response process provided in section 7.1. Other regulatory jurisdictions may require notification depending on the environmental receptors and jurisdictions that are impacted.</p>	<p>Transportation incidents moved into a new, stand-alone section and expanded for clarity.</p>
<b>N/A – NEW</b>	<p><b>7.5 Drilling Fluid Releases from Horizontal Directional Drilling (HDD) for Pipeline Construction</b></p> <p>Refer to Appendix 2 for the reporting of drilling fluid releases from HDD for pipeline construction.</p>	<p>A new section has been created to preface procedures for reporting drilling fluid releases from HDD for pipeline construction in new <a href="#">Appendix 2</a> below.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<b>N/A – NEW</b>	<p><b>7.6 Pipeline Incident</b></p> <p>Pipeline and flowline incidents are to be reported as per Appendix 1 of this Directive. Directive PNG034 provides additional details on the jurisdictional breaks to assist with determining if an incident is a flowline or pipeline incident instead of a facility incident.</p>	New section was created to provide clarity and guidance on pipeline incidents.
<p><b>3.3 Notification by Person Other than an Operator</b></p> <p>If a spill or other incident occurs while a product or waste is being transported, the owner of the product or waste must report the incident in accordance with section 3.1 and 3.2.</p> <p>In the event of an incident of unknown origin, any person who witnesses or has information on the incident may provide notification to the Emergency Support line at 1-844-764-3637.</p>	<p><b>7.7 Notification of an Incident by an Individual Other Than an Operator</b></p> <p>In the event of an incident of unknown origin, any person who witnesses or has information on the incident may provide notification to the Emergency Support line at 1-844-764-3637 or notify the appropriate Field Office.</p>	Notification of an incident by an individual other than an operator moved into a new, stand-alone section for clarity.
<p><b>4. Incident Reporting Requirements and Timelines</b></p> <p><b>4.3 Detailed Incident Report</b></p> <p>Within 90 days of the submission of the initial incident report notification, the operator must provide the following details in IRIS:</p> <ul style="list-style-type: none"> <li>Impacted Surface Information: <ul style="list-style-type: none"> <li>size of spill (m<sup>2</sup>)</li> <li>percentage (%) off-lease that was impacted by the incident</li> </ul> </li> <li>Substance Information: <ul style="list-style-type: none"> <li>substance type(s)</li> <li>amount of substance spilled or released (m<sup>3</sup>)</li> <li>amount of substance recovered (m<sup>3</sup>)</li> <li>amount and type of other materials recovered during remedial activities</li> </ul> </li> <li>Source Information: <ul style="list-style-type: none"> <li>source of the incident – well, pipeline, facility, flowline, other</li> <li>licence identifier – licence number of the source</li> </ul> </li> </ul>	<p><b>8. Incident Reporting Requirements and Timelines</b></p> <p><b>8.1 90 Day Incident IRIS Update and Written Report</b></p> <p>Within 90 days of the date of the incident, the operator must provide updated information on the information provided in section 7.2.2, as well as following details in IRIS:</p> <ul style="list-style-type: none"> <li>Substance Information Update: <ul style="list-style-type: none"> <li>Amount of substance recovered (m<sup>3</sup>)</li> <li>Amount and type of other materials recovered during remedial activities.</li> </ul> </li> <li>Source Information: <ul style="list-style-type: none"> <li>Incident cause (e.g., break, malfunction, human error, act of nature, etc.)</li> </ul> </li> </ul> <p>The operator must also provide the following details within IRIS and a written report of all incident remediation or investigation that has occurred to date and future plans for the site. The report must address the following, as applicable:</p> <ul style="list-style-type: none"> <li>Site summary;</li> <li>Site sketch including all site attributes;</li> <li>Photographic summary of incident remediation and reclamation;</li> <li>Stakeholder communication (including landowner) summary;</li> <li>Description of remediation criteria to be used; PNG033 or deferment. ER approval is required in the case of deferment and must be attached to the report;</li> </ul>	<p>Removed some fields from the existing 90-day report as they have been moved to the initial IRIS notification (see <a href="#">section 7.2.2</a> above) and clarified that all fields need to be updated if they are no longer accurate from the initial report.</p> <p>The 90-day incident report will require a new written report detailing efforts to remediate and reclaim spill-impacted sites per ER's Liability Management directives. If an incident remains unresolved after 90 days, a follow-up report is required at six months to update ER on reclamation progress. Failure to complete reclamation by the six-month mark will trigger long-term reporting until final closure criteria are met. Additionally, IRIS must be updated with status updates on remediation and reclamation activities as described in <a href="#">section 11</a> below.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<ul style="list-style-type: none"><li>incident cause (e.g., break, malfunction, human error, act of nature, etc.)</li><li>Attachments:</li><li>site sketch, photos, report, lab results</li></ul>	<ul style="list-style-type: none"><li>Chronological report of all remediation and reclamation completed;</li><li>Excavation details including areas/volumes and backfill material details (source and analytical information);</li><li>Details of any soil treatment utilized;</li><li>Contaminated material disposal information (disposal location, volumes);</li><li>Future work, including remediation and incident reclamation, to be completed on the site complete with an estimated timeline;</li><li>If impacts are to remain in situ, justification along with ER approval must be given explaining why the impacts are to remain and what mitigation is needed;</li><li>Analytical summary of all lab data and field screening values that corresponds to the material released;</li><li>Original laboratory analytical results;</li><li>Description of how the site meets chosen remediation criteria, PNG033 or deferral, if applicable;</li><li>Description of how the site meets chosen reclamation criteria, PNG033/PNG018 or deferral, if applicable, including justification for site to be moved to a <i>Closed OR Closed – Pending Remediation/Reclamation Assessment at Final Abandonment</i> ;</li><li>Investigation report for pipeline incidents (Section 13); and,</li><li>Any additional information requested by ER.</li></ul>	
<p><b>4.4 Incident Reclamation Report (IRR)</b></p> <p>When an incident occurs, whether on-lease or off-lease, the operator is required to:</p> <ol style="list-style-type: none"><li>1. Immediately treat or dispose of any contaminated material;</li><li>2. Remediate, or where necessary, reclaim the impacted area to the satisfaction of the minister; and</li><li>3. Subject to section 4.5, submit an incident reclamation report (IRR) in accordance with this section documenting the actions of the operator to resolve the incident and providing evidence demonstrating the successful resolution of the incident.</li></ol> <p>The scope and complexity of incidents will vary significantly depending on the nature of the incident (minor versus major spill events for example) and therefore, so too will the</p>	<p><b>REPEALED</b></p>	<p>Section has been removed and incorporated into other sections in the updated directives. In particular, information on remediation and reclamation actions undertaken by an operator to address the impacts of a spill or other incident previously included in the Incident Reclamation Report are now to be included within the written report to be provided at 90-days as described in the new <a href="#">section 8.1</a> outlined above.</p>

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p>reclamation reporting requirements. For this reason, IRIS allows for the submission of more than one IRR per incident. For example, in many instances, such as a minor reportable spill, the incident may be closed with the submission of a single IRR which includes the following information:</p> <ul style="list-style-type: none"><li>• Sampling information and analytical lab test results (prior to reclamation) as well as confirmatory sampling and test results (after reclamation)- note that sampling for on-lease spills is not required unless ordered by the minister;</li><li>• Excavation details including areas/volumes, fill material details, contaminated soil disposal information (disposal location, volumes);</li><li>• Details of any treatment of soil that took place;</li><li>• Restoration information; and</li><li>• Any additional information required by the minister.</li></ul> <p>The IRR must be submitted within 6 months of completing the reclamation. If the incident occurred on-lease at a well or facility site (except in the case of a line break), the IRR does not require the signature of a certified third party environmental reclamation professional. The IRR submission for all other incidents, including line breaks whether on or off lease, must be signed by a certified third party environmental reclamation professional.</p> <p>Additional reporting is required where the magnitude or complexity of an incident has resulted in significant and/or long term environmental impacts. The reporting requirements generated by these types of incidents may typically include various phases of environmental site assessment (for delineation purposes), remediation reporting and periodic monitoring reports. For these types of incidents, multiple IRRs may be submitted as necessary for each of the various stages of remediation that may be required. ER will provide clarity on reporting requirements and the timing of such reporting on a site specific basis where necessary.</p>		

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
<p>ER recognizes that on-site infrastructure will preclude the successful excavation of all impacted material in some cases. An IRR should still be submitted when the work has been completed to the extent possible at the time, but the IRR should specify that additional remediation will be required at time of site closure.</p> <p><b>Note:</b> <i>The term “reclamation” is ordinarily understood to mean the remediation of impacts at a site as well as the restoration of the site back to the original condition or a state or that is equivalent with surroundings. Depending upon whether the incident occurred on an active site or off lease, the expectations will vary from minor spill remediation to full land reclamation.</i></p>		
<p><b>N/A – NEW</b></p>	<p><b>8.2 Six-Month Incident Report</b></p> <p>If the incident is not closed after the 90 Day Detailed Incident Report as per section 8.1, six-month incident reporting is required. The six-month report must include any activities completed since the 90-day report. This report must be submitted within six months of the initial incident submission date.</p> <p>If final incident remediation and/or reclamation has been achieved as required, but the vegetation requirements of Directives PNG033 and PNG018 have not been established, the report must provide a description of how the site meets the applicable criteria and justification for site to be moved to <i>Vegetation Establishment</i> status.</p> <p>If final incident remediation and/or reclamation has been achieved by the six-month reporting deadline, the report must provide a description of how the site meets the applicable criteria, if required and justification for site to be moved to a <i>Closed OR Closed – Pending Remediation/Reclamation Assessment at Final Abandonment</i>. If final reclamation has not been achieved after six months, future work must be reviewed with ER and the incident will be subject to long term reporting.</p>	<p>New section to provide details on the requirements on the 6-month reporting requirements for incidents.</p>
<p><b>N/A – NEW</b></p>	<p><b>8.3 Long Term Reporting</b></p> <p>Additional reporting is required where the magnitude or complexity of an incident results in significant and/or long-term environmental impacts. The reporting requirements generated by these types of incidents will typically include various</p>	<p>New section to provide details on long-term reporting requirements for incidents. This requirement will apply if reclamation of a site impacted by an incident has not been completed as of the six-month incident report described in new <a href="#">section 8.2</a> above.</p>



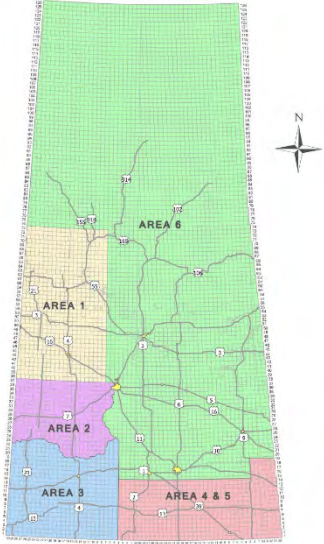
Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
	phases of environmental site assessment (for delineation purposes), remediation reporting and periodic monitoring reports. For these types of incidents, multiple written reports may be submitted as necessary for each of the various stages of remediation. ER will require annual reporting until the site reaches the applicable closure requirements.	
<b>4.5 Exceptions to IRR Submission Requirements</b>  An IRR is not required for the following incidents: <ul style="list-style-type: none"> <li>• A fire, blow-out or kick that results only in a release of a gas;</li> <li>• A release of natural gas or hydrogen sulfide gas; and,</li> <li>• Contact damage to a flowline or pipeline that does not result in a break or leak.</li> </ul>	<b>8.4 Exceptions to Written Submission Requirements</b>  Written reports are not required for the following incidents, unless otherwise instructed by ER: <ul style="list-style-type: none"> <li>• A fire, blow-out or kick that results in a release of a gas only;</li> <li>• A release of natural gas or H<sub>2</sub>S gas from above ground infrastructure;</li> <li>• Contact damage to a pipeline that does not result in a break or leak;</li> <li>• Written six-month reporting is not needed if final site reclamation has been documented in the 90-day written report; and,</li> <li>• Incidents that occurred during transportation (section 7.4).</li> </ul>	Updated wording to align with changes and reference to the requirement of a written report.
<b>4.6 Relief from IRR Submission Requirements</b> In addition to the general exceptions listed in section 4.5, ER may relieve the operator of the requirement to submit an IRR pursuant to this Directive if it determines that a more extensive reclamation program is required to resolve the environmental impact. In these situations, ER will work with the operator to develop the program and to identify any site-specific actions or reporting requirements tied to the program.	<b>REPEALED</b>	Section removed
<b>N/A - NEW</b>	<b>9. Incident Remediation Requirements</b>  Any area that is impacted outside of the operating area of a well or facility site must utilize the remediation criteria outlined in Directive PNG033. This applies to any area impacted by a flowline or pipeline incident that is outside of the operating area of a well or facility site. Site assessments on impacted areas shall be assessed using the methodology outlined in Directive PNG033.  Unless otherwise requested by ER, incidents contained within the operating area of a well or facility site do not necessitate remediation to the criteria specified in Directive PNG033 under the following conditions: <ul style="list-style-type: none"> <li>• where no environmental receptors are impacted or have the potential to be impacted; and,</li> <li>• there is no risk of remaining impacts migrating off the operating area.</li> </ul>	New section to clarify operators' obligations to conduct remediation activities in accordance with Directive PNG033.

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
	<p>However, within the operating area, the recovery of all free products and removal of visible staining are mandatory before closing the incident. It is crucial that these impacts are not incorporated into the site or covered with new material to comply with these requirements.</p> <p>Any remaining impacts within the operating area must be remediated according to the criteria outlined in Directive PNG033 during the final site reclamation at time of abandonment. Prior to the site's final reclamation and abandonment, if there are indications of a receptor impact or migration of contaminant off the operating area, licensees shall notify ER and additional remediation may be required at that time.</p>	
N/A - NEW	<p><b>10. Incident Reclamation Requirements</b></p> <p>Any area that is impacted by an incident outside of the operating area of a well or facility site or is off lease of a flowline or pipeline, shall be reclaimed to the criteria outlined in Directive PNG018. For any areas within the operating area of a well or facility reclamation can be deferred to final abandonment of the site.</p>	New section to clarify operators' obligations to conduct reclamation activities in accordance with Directive PNG018.
N/A - NEW	<p><b>11. Incident Status</b></p> <p>The progress of an incident is to be updated in IRIS as the incident remediation is progressing. Not all of the following statuses may be applicable for every incident. The incident statuses include:</p> <ul style="list-style-type: none"> <li>• <b>Open Pending 90 Day Incident Detail:</b> IRIS will assign this status to an incident once the IRIS Notification by Operator is complete, section 8.1</li> <li>• <b>Open Pending Six-Month Report:</b> IRIS will assign this status to an incident if the 90 Day Incident Report does not result in <i>Closed</i> OR <i>Closed – Pending Remediation/Reclamation Assessment at Final Abandonment</i>.</li> <li>• <b>Long Term Management:</b> Used to describe an incident if the Six- Month Incident Report does not result in <i>Closed</i> OR <i>Closed – Pending Remediation/Reclamation Assessment at Final Abandonment</i>. Long-term Management sites have an annual progress reporting requirement on the IRIS submission date.</li> <li>• <b>Vegetation Establishment:</b> Used to describe an incident if the Six-Month Incident Report does not result in <i>Closed</i> OR <i>Closed – Pending Remediation/Reclamation Assessment at Final Abandonment</i>. Remedial activities are completed but vegetative assessment is required. This includes</li> </ul>	New section to provide information on the new statuses set for incidents in IRIS and how an incident can qualify for a status.

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
	<p>any vegetation monitoring requirements provided in Directive PNG033 related to NaCl impacts.</p> <ul style="list-style-type: none"> <li>• <b>Closed:</b> Used to describe an incident that did not require remediation/reclamation, or remediation criteria is met that allows closure as per Directive PNG033 and reclamation criteria is met as per Directive PNG018 (Detailed Site Assessment) and Directive PNG016 (Acknowledgement of Reclamation, or AOR).</li> <li>• <b>Closed – Pending Remediation/Reclamation Assessment at Final Abandonment:</b> Used to describe an incident that did not meet remediation criteria as per Directive PNG033 and impacts still exist, and/or reclamation criteria as per Directive PNG018. These incidents require further assessment at time of abandonment and AOR and is only applicable to incidents where the remaining contaminated area is on the operating area.</li> </ul>	
<p><b>4.7 Root Cause Analysis reports</b></p> <p>In the event of a break, leak or malfunction relating to a well, facility, pipeline or flowline or associated equipment, ER may require the operator to complete a written technical report analyzing the root cause of the incident. This report, including any associated sub-reports and supporting documentation, must be submitted into IRIS and is in addition to an IRR submission.</p>	<p><b>12. Root Cause Analysis Reports</b></p> <p>In the event of a break, leak or malfunction relating to a well, facility, pipeline, flowline or associated equipment, ER may require the operator to complete a written technical report analyzing the root cause of the incident. The report must identify the incident cause and include measures to be implemented to prevent the occurrence of incidents due to similar causes. This report, including any associated sub-reports and supporting documentation, must be submitted into IRIS.</p>	Moved into its own section, emphasis on report requiring that the incident cause must be identified, and measures that have been implemented to prevent the occurrence of future incidents of the same nature.
<b>N/A – NEW</b>	<p><b>13. Pipeline Incident Investigation</b></p> <p>In the event of an incident on a pipeline, ER requires the submission of the results of the incident investigation required by the latest standard of <i>CSAZ662: Oil and Gas Pipeline Systems</i>. The report must identify the incident cause and include measures to be implemented to prevent the occurrence of incidents due to similar causes. The report must be submitted within 90 days of the incident occurring unless otherwise an extension is granted.</p>	New section to provide information on requirements on pipeline incident investigations.
<p><b>5. Compliance and Enforcement</b></p> <p>Failure to comply with the requirements in this Directive may result in enforcement actions under the OGCA (wells, facilities, flowlines) or the PA (licensed pipelines).</p>	<b>REPEALED</b>	Section Removed
<b>N/A - NEW</b>	<b>14. Oil Spill Contingency Groups</b>	New section added in to refer to Area Spill Response Units as they appear in Directive S-01.

Existing Section/Wording					New Section and Wording					Explanation of Proposed Changes																																					
					All operators are required to be a member in good standing of a local Area Spill Response Unit under <a href="#">Directive S-01</a> . The following links can be used to access individual oil spill contingency groups: <a href="#">Area 1</a> , <a href="#">Area 2</a> , <a href="#">Area 3</a> , <a href="#">Area 4 and 5</a> and <a href="#">Area 6</a> . Please refer to Appendix 4 for a map of Individual Oil Spill Contingency Groups.																																										
Appendix 1: Incidents Subject to Notification and Reporting					Appendix 1: Incidents Subject to Notification and Reporting					New section added to Well or Facility Operations part of Appendix 1 to clarify criteria of reporting for incidents that occur outside of an operating area vs on operating area and on-lease and off-lease.																																					
<table><tr><td rowspan="3">Well or Facility Operation</td><td rowspan="2">Break, leak, malfunction of any equipment or intentional or unintentional action resulting in an escape or release</td><td>Oil, salt water, condensate, oil and gas waste, emulsion or product</td><td>On-lease</td><td>All volumes ≥2.0 m³ or 2000 liters requires reporting but only volumes ≥10.0 m³ or 10000 liters require notification</td></tr><tr><td></td><td>Off-lease</td><td>Any volume</td></tr><tr><td></td><td>Refined Chemical</td><td>On-lease</td><td>All volumes ≥0.5 m³ or 500 liters</td></tr><tr><td></td><td>Escape or Release</td><td>Gas Containing H<sub>2</sub>S</td><td>All</td><td>Any volumes where:  1. The concentration of H<sub>2</sub>S exceeds 0.1 % or 1000 ppm or 1.0 mole H<sub>2</sub>S/kilomole from solids, liquids or gas during production or transportation (truck or transmission via pipeline/flowline); or  2. The released volume poses a danger to human health, domestic animals, wildlife or the environment.</td></tr></table>					Well or Facility Operation	Break, leak, malfunction of any equipment or intentional or unintentional action resulting in an escape or release	Oil, salt water, condensate, oil and gas waste, emulsion or product	On-lease	All volumes ≥2.0 m³ or 2000 liters requires reporting but only volumes ≥10.0 m³ or 10000 liters require notification		Off-lease	Any volume		Refined Chemical	On-lease	All volumes ≥0.5 m³ or 500 liters		Escape or Release	Gas Containing H <sub>2</sub> S	All	Any volumes where:  1. The concentration of H <sub>2</sub> S exceeds 0.1 % or 1000 ppm or 1.0 mole H <sub>2</sub> S/kilomole from solids, liquids or gas during production or transportation (truck or transmission via pipeline/flowline); or  2. The released volume poses a danger to human health, domestic animals, wildlife or the environment.	<table><tr><td rowspan="5">Well or Facility Operation</td><td rowspan="4">Break, leaks, malfunction of any equipment or intentional or unintentional action resulting in an escape or release</td><td rowspan="2">Oil, salt water, condensate, oil and gas waste, emulsion or product</td><td>On Operating Area</td><td>All volumes ≥ 2.0 m3 or 2000 Liters requires reporting but only volumes ≥ 10.0 m3 or 10,000 Liters require immediate notification</td></tr><tr><td>Off Operating Area</td><td>Any volume</td></tr><tr><td>Refined Chemical</td><td>On Lease</td><td>All volumes ≥ 0.5 m³ or 500 Liters</td></tr><tr><td rowspan="2">Escape or Release</td><td rowspan="2">Gas containing H2S</td><td>On Lease</td><td>Any volumes where the concentration of H2S exceeds 0.1 % or 1,000 ppm or 1.0 mole H2S/kilomole from solids, liquids or ga</td></tr><tr><td>Off Lease</td><td>Exceeding ambient air quality, reported by public, or when the public can potentially be impacted</td></tr></table>					Well or Facility Operation	Break, leaks, malfunction of any equipment or intentional or unintentional action resulting in an escape or release	Oil, salt water, condensate, oil and gas waste, emulsion or product	On Operating Area	All volumes ≥ 2.0 m3 or 2000 Liters requires reporting but only volumes ≥ 10.0 m3 or 10,000 Liters require immediate notification	Off Operating Area	Any volume	Refined Chemical	On Lease	All volumes ≥ 0.5 m³ or 500 Liters	Escape or Release	Gas containing H2S	On Lease	Any volumes where the concentration of H2S exceeds 0.1 % or 1,000 ppm or 1.0 mole H2S/kilomole from solids, liquids or ga	Off Lease	Exceeding ambient air quality, reported by public, or when the public can potentially be impacted					
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N/A – NEW					Appendix 2: Reporting Drilling Fluid Releases from Horizontal Directional Drilling (HDD) for Pipeline Construction					New Appendix 2 to outline reporting procedures for releases of drilling fluids from horizontal directional drilling (HDD) for pipeline construction. The reporting procedures and criteria in Tables 1 and 2 of this Appendix previously appeared in ER Bulletin <a href="#">BT2019-008</a> . To clarify ER’s expectations regarding the reporting of releases relating to HDD-type incidents (and to make it easier to reference these), the contents of BT2019-008 will be incorporated directly into Directive PNG014.																																					
					In the context of HDD for pipeline construction, a non-critical release is defined as a release in which the drilling fluid is not considered harmful and the release itself causes no adverse effects. Adverse effects are considered as impairment or damage to the environment or harm to human health, caused by any chemical, physical or biological alteration, or any combination thereof. Please refer to Table 1 below for the criteria to assess non-critical HDD releases.																																										
					A critical release is any release that does not meet any of the non-critical release criteria outlined in Table 1.																																										

Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes														
	<div><div><div><div><div><div><b>Table 1: Non-Critical Release</b></div><table><tr><th>CATEGORY</th><th>CRITERIA</th></tr><tr><td>HDD Surface Release</td><td>An HDD surface release is non-critical if it meets the following criteria:<ul style="list-style-type: none"><li>the release has not entered a <a href="#">wetland</a>;</li><li>the release has not altered the configuration of the bank or boundary of any watercourse or water <a href="#">body</a>;</li><li>the release is contained within the right-of-way or within any temporary <a href="#">workspace</a>;</li><li>the release does not exceed 2 <a href="#">m</a><sup>3</sup>;</li><li><a href="#">the</a> drilling fluid contains additives that do not exceed criteria listed in GL 99-01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL 99-01; and</li><li>the reasonable recovery of drilling fluids will be done immediately</li></ul></td></tr><tr><td>HDD Subsurface Release</td><td>An HDD subsurface release is non-critical if it meets the following criteria:<ul style="list-style-type: none"><li>the drilling fluid additives do not exceed criteria listed in GL99-01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL <a href="#">99-01</a>;</li><li><a href="#">the</a> drilling fluid additives do not have guidelines listed in GL 99- 01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL 99-01; and</li><li>the release is not suspected to have impacts to potable and/or livestock water sources.</li></ul></td></tr></table></div></div></div><div><p><b>Note:</b> Pipeline licence holders and operators are required to follow the reporting procedure listed in Table 2.</p></div><div><div><div><div><div><div><b>Table 2: Drilling Fluid Releases from HDD Reporting Procedure</b></div><table><tr><th>CATEGORY</th><th>REPORTING PROCEDURES</th></tr><tr><td>Non-Critical HDD Surface Release</td><td>Use the Non-Critical HDD <a href="#">Surface Release Report Form</a>. Record the release and retain the records as part of the pipeline construction file.</td></tr><tr><td>Non-Critical HDD Subsurface Release</td><td>Record the release and retain the records as part of the pipeline construction file.</td></tr><tr><td>Critical HDD Release</td><td>Follow notification and reporting requirements set out in this Directive.</td></tr></table></div></div></div></div></div></div></div>	CATEGORY	CRITERIA	HDD Surface Release	An HDD surface release is non-critical if it meets the following criteria: <ul style="list-style-type: none"><li>the release has not entered a <a href="#">wetland</a>;</li><li>the release has not altered the configuration of the bank or boundary of any watercourse or water <a href="#">body</a>;</li><li>the release is contained within the right-of-way or within any temporary <a href="#">workspace</a>;</li><li>the release does not exceed 2 <a href="#">m</a><sup>3</sup>;</li><li><a href="#">the</a> drilling fluid contains additives that do not exceed criteria listed in GL 99-01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL 99-01; and</li><li>the reasonable recovery of drilling fluids will be done immediately</li></ul>	HDD Subsurface Release	An HDD subsurface release is non-critical if it meets the following criteria: <ul style="list-style-type: none"><li>the drilling fluid additives do not exceed criteria listed in GL99-01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL <a href="#">99-01</a>;</li><li><a href="#">the</a> drilling fluid additives do not have guidelines listed in GL 99- 01. In the absence of Saskatchewan based criteria, criteria from other jurisdictions should be used when guidelines for specific chemicals are not stated in GL 99-01; and</li><li>the release is not suspected to have impacts to potable and/or livestock water sources.</li></ul>	CATEGORY	REPORTING PROCEDURES	Non-Critical HDD Surface Release	Use the Non-Critical HDD <a href="#">Surface Release Report Form</a> . Record the release and retain the records as part of the pipeline construction file.	Non-Critical HDD Subsurface Release	Record the release and retain the records as part of the pipeline construction file.	Critical HDD Release	Follow notification and reporting requirements set out in this Directive.	
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Existing Section/Wording	New Section and Wording	Explanation of Proposed Changes
N/A – NEW	<p><b>Appendix 4: Oil Spill Contingency Group Areas</b></p>  <p>The map displays a grid of roads with several regions highlighted in different colors and labeled: AREA 1 (yellow), AREA 2 (purple), AREA 3 (blue), AREA 4 &amp; 5 (red), AREA 6 (green), and AREA 7 (orange). A north arrow is located to the right of the map.</p>	Map added to show location of the Oil Spill Contingency Group Areas (pursuant to <a href="#">section 14</a> above).