

Subject: RE: S13L1-007 Norman Wells: 2022 Flowline Integrity Management Plan Submission
Date: Friday, December 17, 2021 at 12:20:27 PM Mountain Standard Time
From: Glowa, Kevin R
To: tim.morton@rcaanc-cirnac.gc.ca, Bonnie Bergsma, tim.morton
CC: Pangracs, Steve J, Crawford, Jody A, Ford, Douglas K, Fraser, Benjamin C

Afternoon Tim.

I am filling in for Ben as he is on holidays. In regards to your question please see the response below

The 2011 incident involved injection of a chemical into an open loop system, which unfortunately resulted in a release to the environment. That investigation identified a breakdown in our management of change process that should have identified the potential issue upfront. Today we deploy a 'new chemical to site' process that ensures chemicals are appropriately reviewed for their application and approved before being put into use. For all new chemicals that are brought to site, they follow our NHMSI (New Hazardous Material to Site Inventory) form. This form goes into great depth on the intended use and handling details, specifically looking at the SDS for the chemical. Each chemical has an environmental review, safety review and industrial health review prior to bringing them to site and prior to initiating the MOC to capture the change event. Once approved the SDS for a chemical gets added to our SDS database for workers who deal with the chemical.

The chemicals referred to in section 3.6 are not released to the environment. The chemicals are injected into a closed loop system (i.e. cannot be released to the environment) and act as a key barrier and/or function by preventing internal corrosion of our systems and subsequent flowline/pipeline failure. We also employ other preventative measures such as cathodic protection and predictive measures including In-Line-Inspections and Spot Ultrasonic Testing/Non Destructive Examination to identify lines that may require replacement before a failure occurs. Lastly, we have a leak detection program (highlighted in the report) that helps identify if a failure were to occur to further mitigate any release to the environment.

Cheers

Kevin R. Glowa M.S.C., R.P.Bio

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From: Morton, Tim [<mailto:tim.morton@rcaanc-cirnac.gc.ca>]

Sent: Wednesday, December 15, 2021 12:01 PM

To: Fraser, Benjamin C <benjamin.fraser@esso.ca>; Bonnie Bergsma <bonnie.bergsma@slwb.com>; tim.morton@canada.ca

Cc: Crawford, Jody A <jody.a.crawford@esso.ca>; Pangracs, Steve J <steve.j.pangracs@esso.ca>; Ford, Douglas K <douglas.k.ford@exxonmobil.com>

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Thanks Ben,

How does Imperial Oil ensure that the chemicals used in section 3.6 of the plan are not hazardous to the environment and what steps are taken to ensure they are not released to the environment? As you may or may not know, there was an incident in 2011 where a corrosion inhibitor was released to the Mackenzie River that was never intended for use in a open loop system.

Tim Morton
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From: Fraser, Benjamin C <benjamin.fraser@esso.ca>
Sent: Wednesday, December 15, 2021 11:13 AM
To: Bonnie Bergsma <bonnie.bergsma@slwb.com>; tim.morton@canada.ca
Cc: Crawford, Jody A <jody.a.crawford@esso.ca>; Pangracs, Steve J <steve.j.pangracs@esso.ca>; Ford, Douglas K <douglas.k.ford@exxonmobil.com>
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Good morning Bonnie & Tim,

As per our Norman Wells Water License S13L1-007 – Part F(5), Imperial is submitting our Flowline Integrity Management Plan which recently went through annual reviews and updates. There were a few enhancements to our plan this year focusing on our surveillance and leak detection programs. After review, please don't hesitate to reach out if there are any questions.

Hope you both have a great time over the holidays and we will be in touch in the New Year.

Kind regards,
Benjamin Fraser
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