

**Obsidian Energy**  
**Application for an Operations Authorization (OA-2019-001-OBS)**  
**Information Request No. 9**

**9.1 Environmental Protection Plan**

**PREAMBLE:**

Section 9 of the *Oil and Gas Drilling and Production Regulations* (OGDPR) states that the Environmental Protection Plan must set out the procedures, practices, resources and monitoring necessary to manage hazards to and protect the environment from the proposed work or activity and lists specific items that must be included in the submission. OROGO's *Environmental Protection Plan Guidelines and Interpretation Notes* (Guidelines) outline the purpose, scope, content and format required to meet the requirements of the OGDPR. The Guidelines can be found on OROGO's website at [www.oro.go.gov.nt.ca](http://www.oro.go.gov.nt.ca).

Information Request No. 8 required that Obsidian provide a detailed Environmental Protection Plan and an updated concordance table that specifies where the information that meets the requirements of section 9 of the OGDPR can be found.

On August 7, 2020, Obsidian responded to Information Request No. 8 but did not provide the requested detailed Environmental Protection Plan or updated concordance table. Obsidian's response claimed that the requested supporting documentation had been previously provided in the Obsidian SMART Manual and specifically referenced "Vendor Management SMART Manual – Element 6 - Contractor Management". The SMART Manual was submitted as part of Obsidian's response to Information Request #2 and reviewed by OROGO. The Smart Manual (including Element 6) does not address the requirements of section 9 of the OGDPR.

**REQUEST:**

Please provide an updated Environmental Protection Plan, supporting documentation and concordance table that references where, in any of the documents that have been submitted as part of this application process, the information to meet the requirements of Section 9 of the OGDPR can be found. Specifically, the concordance table must include references for:

- (a) a summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in these regulations with regard to environmental protection will be fulfilled;
- (b) a summary of the studies undertaken to identify environmental hazards and to evaluate environmental risks relating to the proposed work or activity;

- (c) a description of the hazards that were identified and the results of the risk evaluation;
- (d) a summary of the measures to avoid, prevent, reduce and manage environmental risks;
- (e) a list of all structures, facilities, equipment and systems critical to environmental protection and a summary of the system in place for their inspection, testing and maintenance;
- (f) a description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains:
  - (i) their relationship to each other;
  - (ii) the contact information and position of the person accountable for the environmental protection plan and the person responsible for implementing it.
- (g) the procedures for the selection, evaluation and use of chemical substances including process chemicals and drilling fluid ingredients;
- (h) a description of equipment and procedures for the treatment, handling and disposal of waste material;
- (i) a description of all discharge streams and limits for any discharge into the natural environment including any waste material;
- (j) a description of the system for monitoring compliance with the discharge limits identified above, including the sampling and analytical program to determine if those discharges are within the specified limits; and
- (k) a description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

All documents referenced in the updated concordance table should include the full document name, section and page number. Should the updated concordance table reference a document, or section thereof, that has not been previously submitted to OROGO as part of this application process, that document must be included with the response to this information request.

## 9.2 Contingency Plan

### **PREAMBLE:**

Section 6(j) of the *Oil and Gas Drilling and Production Regulations* (OGDPR) states that the application for authorization must be accompanied by contingency plans, including emergency response procedures, to mitigate the effects of any reasonably foreseeable event that might compromise safety or environmental protection, which must provide for coordination measures with any relevant municipal, provincial, territorial or federal emergency response plan.

Information Request No. 8 required that Obsidian provide an updated site-specific Emergency Response Plan and concordance table that specifies where the information that meets the requirements of section 6(j) of the OGDPR can be found.

On August 7, 2020, Obsidian responded to Information Request No. 8 but did not provide the required updated site-specific Emergency Response Plan and concordance table. Obsidian's response claimed that the information that meets the requirements for section 6(j) of the OGDPR is contained in their previously submitted Safety Plan, Spill Contingency Plan and NWT Emergency Response Plan (Plans).

The Plans submitted as part of Obsidian's response to Information Requests No. 2, No. 3 and No. 4 were reviewed by OROGO. The information provided within these plans does not fully meet the requirements of section 6(j) of the OGDPR. Specifically, the information that was provided is insufficient to address the following requirements:

- emergency response procedures, to mitigate the effects of any reasonably foreseeable event that might compromise safety or environmental protection; and
- coordination measures with any relevant municipal, provincial, territorial or federal emergency response plan.

### **REQUEST:**

Please provide an updated site-specific Emergency Response Plan, supporting documentation and concordance table that references where, in any of the documents that have been submitted as part of this application process, the information to meet the requirements of Section 6 (j) of the OGDPR can be found . Specifically, the concordance table must include references for:

- contingency plans;
- emergency response procedures, to mitigate the effects of any reasonably foreseeable event that might compromise safety or environmental protection; and
- coordination measures with any relevant municipal, provincial, territorial or federal emergency response plan.

All documents referenced in the updated concordance table should include the full document name, section and page number. Should the concordance table reference a document, or section thereof, that has not been previously submitted as part of this application process, that document must be included with the response to this information request.