

How to report effectively in the CER Online Event Reporting System (OERS)



Entries observed when filing out the Online Event Reports (OERS) and some areas where clarification might be helpful.

Please feel free to ask questions through out the presentation or if you prefer, you can ask questions through chat.

What are the event types to report?

*What are the event types that you are reporting?

▼ Damage Prevention Regulations (Check all that apply)

Contraventions of the Damage Prevention Regulations - Authorizations

- Vehicle Crossing
- Ground Disturbance
- Construction of a Facility

Damage to Pipe

- Damage to Pipe

▼ Notification (check only one)

Canadian Energy Regulator Onshore Pipeline Regulations

- Operations and Maintenance
- Class Location Change
If necessary CSA Z150.223 Clause C.5 Pressure Design, see CSA Z162.23 Oil and gas pipeline systems standard notification submissions below
- Annual Report Notification

Processing Plant Regulations

- Emergency Flaring
- Hazard Identification
- Suspension of Operations

Damage Prevention Regulations

- Suspension of Consent

When you're submitting the events to be reported, select the appropriate fields as you can see on the left side of this slide to the activities your reporting.

In the report under the Event type tab, we'll talk about the damage prevention activities today

Suspension of Consent on the bottom of the right slide, that is currently under the Notifications tab will be moving to the Damage Prevention Regulations drop down list on the left. This should be done with the next OERS updates.

Initial Report

Instructions

Please enter the requested information and click the Save and Next button at the bottom of this page to proceed to the next page.



* Is this a precautionary report?

Yes



* Was the pipe contacted?

No

Precautionary Approach

If there's any doubt as to whether an event should be reported, please report it.

Please submit the report as precautionary within the 24 hour timeframe.

If the precautionary report is not reportable, ask the CER to retract the report. CER will review the submission against the regulatory requirements and if it's not reportable we can change the status of the report to Misreported.

Circumstances

Instructions
 For each event type selected for this event, please fill in the relevant circumstances below. When finished, click the Save and Next button at the bottom of the page to proceed to the next page.

* Does the company have any immediate concerns for the safety of persons, the safety of regulated facilities, or the protection of property and the environment?
 -- Select --

Description

* Provide a complete description of the circumstances leading up to and resulting from the event including the consequences on the pipeline, property, and/or the environment

* Describe all actions taken or planned to address the consequences of the event including any mitigation, repair, replacement, and/or evacuation

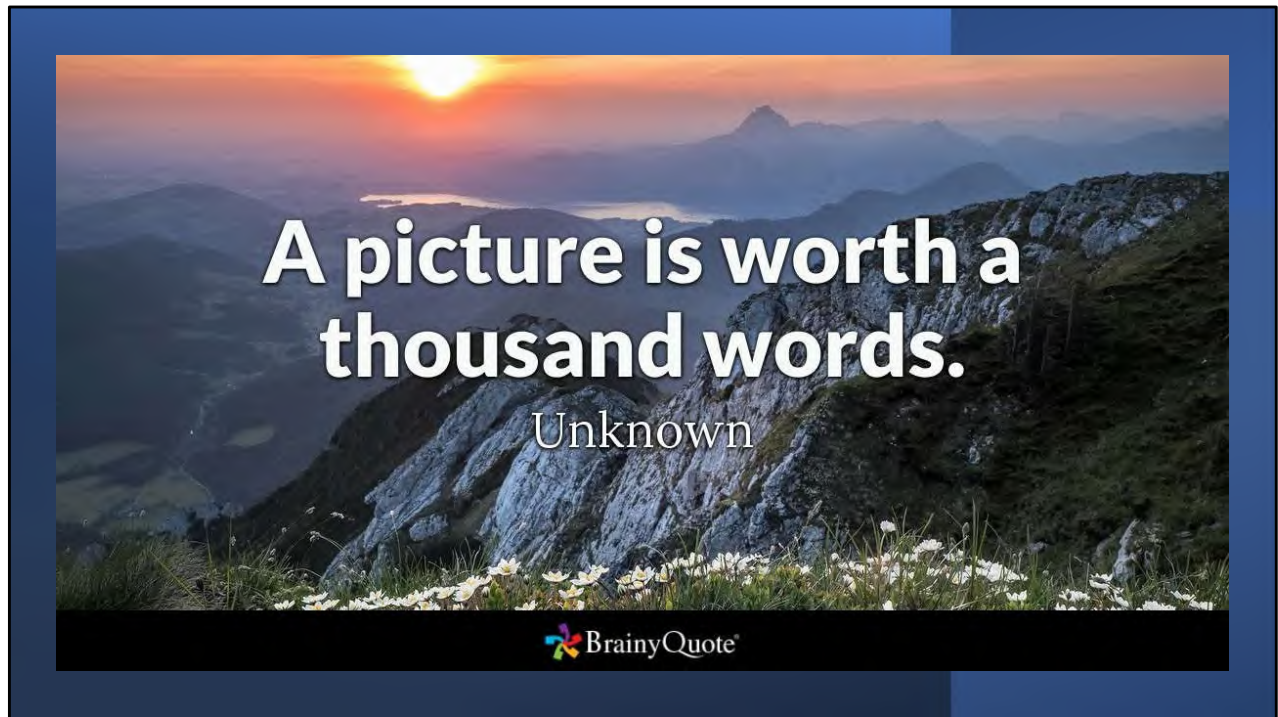
Under the Circumstance field “Description” where it asks “Provide a complete description of the circumstances,

- if you’re able to, please put as much information as you can in this field.

And under “Describe all actions taken or planned to address the consequences of the event...”

please fill out as much as you can here as well prior to the final report. The information in these fields "could" help us evaluate the severity of the activity.

What's beneficial is pictures of the activity that's being reported. As a lot of us are visual, seeing the picture or pictures of the activity would be very helpful.



A picture is worth a thousand words. Please provide photos in your UA reports whenever possible.

Location

Instructions
Please enter the requested information and click the Save and Next button at the bottom of this page to proceed to the next page.
Note that if the Onshore Pipeline Regulations (OPR) apply to this event, you are required to specify a pipeline.

Pipeline
Pipeline name
Select "-- Not Listed --" if the pipeline name is not listed or the pipeline details are incorrect. If the event occurred at a gas plant, please select the pipeline that feeds the gas plant. If there is more than one pipeline at this location, select the one where the event originated or the one that you consider most relevant to this event.
-- Select --

Event Location
* Select the country where the event occurred
Canada
* Province or territory
-- Select --
* Did this event take place onshore or offshore?
Onshore
Street address - if applicable ←

Location tab

Under the “Location tab” you see “Street address” marked by the blue arrow.

CER is running a pilot project where we will be sending an education letter to landowners where the report falls within our criteria for a letter to be sent.

If this area is missed, and if the report meets our criteria, we’ll be requesting this address through an IR.

We’re just asking for the address here and not the landowner's name.

Our Criteria to send this Education Letter is:

For landowners only

- If it's a repeat violator, (just one repeat offence) this includes vehicle crossings
- Or the company issued a Stop Work Order,
- Mechanical excavation was within 3m,
- Or if the report mentions that the Landowner was obstinate or stubborn. That could inform us that there may potentially be a poor relationship between the landowner and the company.

Location tab

* What is the populated centre nearest to this location

- Event affects the pipeline right-of-way
- Event affects property off the pipeline right-of-way

Enter any other information that helps to describe this location

Location Tab we're looking to see if the activity was actually on the RoW or off the company RoW.

For example was the activity in the RoW if it was 25 meters from the center of the pipe? It could be, but not in most cases.

Vehicle Crossing

* Did the person obtain the pipeline company's written consent to operate a vehicle or mobile equipment across the pipeline?

Yes

ⓘ The event is not reportable because the person obtained written consent. Enter a justification for why the event is being reported, or return to the Event Types page in the left-hand menu and un-select this Event Type. If the full report requires retraction, use "Send A Message to the CER" in the left-hand menu to request the entire report be retracted.

* Justification for why the event is reportable

* Was the vehicle or mobile equipment used to perform an agricultural activity (Agricultural activity means the production of crops and raising of animals and includes tillage, plowing, disking, harrowing and pasturing, but does not include the construction of new buildings or impervious areas or the placement of footings, foundations, pilings or posts, including fence posts)?

Yes

* Were the loaded weight and tire pressure of the vehicle or mobile equipment within the manufacturer's approved limits and operating guidelines?

Yes

* Was the point of crossing subject to a notification under Section 7 of the Damage Prevention Regulations - Obligations of the Pipeline Companies?

Yes

Whether you selected vehicle crossing, ground disturbance or construction of a facilities, if you receive a message that this event is not reportable like you see in the pinkish area of this slide, the report will ask you for the reason or justification for reporting. Please put in your justification and we'll take a look at the reason for reporting the event to see if it's reportable according to the regulatory requirements.

Vehicle Crossing

* Did the person obtain the pipeline company's written consent to operate a vehicle or mobile equipment across the pipeline?

* Was the vehicle or mobile equipment used to perform an agricultural activity (Agricultural activity means the production of crops and raising of animals and includes tillage, plowing, disking, harrowing and pasturing, but does not include the construction of new buildings or impervious areas or the placement of footings, foundations, pilings or posts, including fence posts)?

* Type of Vehicle or Mobile Equipment

* Did the pipeline company complete a surface load analysis for the vehicle or mobile equipment?

* Rationale for not completing a surface load analysis

When you select Vehicle Crossing, the first sentence mentions “Did the person obtain the pipeline company’s written consent to operate a vehicle or mobile equipment across the pipeline”, we’re referring to “**prior**” to the activity being reported here and not after the event occurred.

And the last question, "Did the pipeline company complete a surface load analysis for the vehicle or mobile equipment", if no analysis was completed, OERS will prompt you for the rationale for not completing a surface load assessment. Mandatory field

Vehicle Crossing Examples

1. Example from a UA Vehicle Crossing report:

“The equipment did not cross the pipeline on one location.”

Meaning???

Did it cross in another location? Or multiple locations?

Does it mean the equipment did not cross on any locations?

Clarity!

2. Vehicle Crossing Equipment: If under 1 ton, a Surface Load Assessment may not have to be performed. If 1 ton or over, was an Assessment done?

Here are 2 examples of issues we came across recently: 1. “The equipment did not cross the pipeline on one location.” What does this mean? This can be interpreted in different ways: Did it cross the pipeline in another location? Did it cross the pipeline in more than one location? Or does it mean that the equipment did not cross on any locations? Be as clear as possible.

2. Second example: Vehicle Crossing Equipment: If under 1 ton, we usually understand that a Surface Load Assessment may not have to be performed. However, if the vehicle is 1 ton or over, please tell us if the Surface Load Assessment was completed or we may have to send an IR.

Ground Disturbance

Summary

Authorization

* Did a person that engaged in the activity that caused a ground disturbance obtain the company's written consent prior to commencing the activity?

No

* Did a person that engaged in the activity that caused a ground disturbance make a locate request in accordance with Section 3 of the Damage Prevention Regulations - Authorizations?

No

* Did a person that engaged in the activity obtain from the pipeline company the information that is referred to in paragraphs 6(1)(a) and (c) of the Damage Prevention Regulations - Obligations of Pipeline Companies?

No

* Did a person that engaged in the activity that caused a ground disturbance within the prescribed area comply with all measures referred to in Section 10(3) of the Damage Prevention Regulations - Authorizations?


N/A

Previous

Save and Next

Ground disturbance:

The first question is asking “Did the person that engaged in the activity that caused a ground disturbance obtain the company’s written consent "prior" to commencing the activity?” **“Prior”** was recently added to OERS - bring this to your attention. Prior for the remaining questions.



Ground
Disturbance

Ground Disturbance

Information

Please Ensure Your Files Are Named Appropriately for Easier Identification:

- Be Descriptive: Use names that clearly indicate the file's content or purpose.
- Avoid Special Characters: Characters like &, %, \$, @ can cause processing errors.
- Include Dates: Include the date, if relevant, in the format YYYY-MM-DD for better version control.

* **Type of activity that caused the ground disturbance**

* **Type of equipment that caused the ground disturbance**

* **Distance from centreline of pipe**

* **Depth of activity**

* **Depth of earth cover over the pipe**

* **Did the activity result in reduction of earth cover over the pipeline right-of-way**

The question by the arrow “Did the activity result in reduction of earth cover over the pipeline RoW,” The intent of this question in OERS is directly over the pipe and not within the RoW.

Construction of a Facility

* Did a person that constructed the facility obtain the company's written consent prior to commencing the activity?

No ▾

* Did a person that constructed the facility make a locate request in accordance with Section 3 of the Damage Prevention Regulations - Authorizations?

No ▾

* Did a person that engaged in the activity obtain from the pipeline company the information that is referred to in paragraphs 6(1)(a) and (c) of the Damage Prevention Regulations - Obligations of Pipeline Companies?

No ▾

* Did a person that undertook the construction of a facility comply with all measures referred to in Section 7 (3) of the Damage Prevention Regulations - Authorizations?

No ▾

For CoF, changes were made here as well where "**Prior**" was also added to the report and for clarification all the questions below are referring to "**Prior**" as well.

Construction of a Facility

* Was the construction of a facility across, on, along, or under a pipeline right-of-way?

-- Select --



* What is the populated centre nearest to this location

- Event affects the pipeline right-of-way
- Event affects property off the pipeline right-of-way

Enter any other information that helps to describe this location

Continuing with CoF, where it asks “Was the construction of a facility across, on, along, or under a pipeline right-of-way?” it’s important that your selection reflects what you selected on the previous page in the Location tab (right picture) where you selected whether the activity was on the RoW or not.

Construction of Facility / Ground Disturbance / Maintenance of a Facility

Fence post replacement

Companies ask:

Is digging a hole for a fence post just GD or also removal of Depth of Cover?

Is replacing an old post a GD?

Basic guide:

Old post 30cm or deeper & you're removing it = ground disturbance

Removal of soil less than 30 cm directly over pipe = reduction of earth cover

DPR-A s 11 contraventions (maintenance of an existing facility) = report as GD, unless authorized

Regarding fences, companies have asked for clarification: Is digging a hole for a fence post just Ground Disturbance (GD) or also removal of Depth of Cover (DoC)? Is replacing an old post a GD?

Basically, if the old fence post was 30cm or deeper & you're removing it – it's an activity causing a ground disturbance.

Removal of soil (even though it may be less than 30 cm) directly over the pipe? This is reduction of earth cover.

If you think it's a contravention of DPR-Auth s.11 (maintenance of an existing facility) -- report as a Ground Disturbance, unless the activity is authorized.

Parties Involved

Ground Disturber

* Select the type that best describes the party
3rd party (no connection to the regulated company)

* Third Party Type
Landowner / Property Owner

* Is this a repeat occurrence for the party?

No

Company (if applicable)

Has the regulated company advised the party that an event report has been submitted to the CER?
Yes

Was this party on the regulated company's public awareness distribution list prior to the event?
Yes

* Most recent date public awareness materials were distributed to the party prior to the event
2024-04-17

"who the third party is" Does this fit one of our criterias for an educational letter?

"if the party was on the company's public awareness list", this is asking "prior" to the event happening and not after.

Last question, the word "prior" was recently added.

Immediate Causes

Immediate Causes

3 Instructions

Check all that apply. Click on the arrows to expand each group of items or click "Expand all" to show all selections.

Expand All

Collapse All

▶ Notification Issue

▶ Locate Issue

▶ Written Consent Issue

▶ Excavation Issue

Under Immediate Causes, there are some options to select such as:

- Locate Issue: perhaps there was no locate requested
- Failure to obtain written consent from the company
- or Improper excavation practices

Basic Causes

Instructions
Check all that apply. Click on the arrows to expand each group of items or click "Expand all" to show all selections.

Expand All Collapse All

- ▶ Job or System Factors
- ▶ Personal Factors
- ▶ External Interference

Basic Causes

Basic Causes tab:

Some examples under Job or System Factors are:

- Inadequate work planning, preparation or work execution
- Inadequate work policies, standards or procedures
- or maybe it was inadequate communication.

For Personal Factors just as it mentions can be:

- Improper motivation
- Lack of skills
- Physical capabilities
- Lack of knowledge or physical stress

And External Interference:

- This is weather related
- You'll also find Historical Damage (causes unknown) here

Examples from Company Reports

1. This is an example of what was submitted, but it can't be all of these:

Basic Causes [Edit](#)
Personal Factors
Lack of knowledge
✓ Misperception of regulation
✓ Unaware of regulation
✓ Defiance of regulation

2. Example of good use of Job or System Factors:

Job or System Factors

Inadequate Communications

Inadequate communication between parties

- ✓ Inadequate communication between project owner and ground disturber
- ✓ Inadequate communication between project owner and facility constructor

Inadequate communication methods

- ✓ Incorrect instructions

Some companies seem to have problems with Basic Causes. Here are some examples from UA reports submitted recently: In Example 1, Basic causes listed are: Misperception of regulation AND Unaware of regulation AND defiance of regulation. Well, it can't really be all of those. You need to choose the closest causal factor.

In #2 example of Basic Causes, these Job or System Factors ticked were really good answers as they aligned closely with the details of the UA Report and with the lack of communication the company found between all the parties on site.

• If we see this:

Basic Causes Edit

Personal Factors

- Lack of knowledge
- ✓ Lack of situational awareness
- ✓ Unaware of regulation

• Then we'll look to see if they received a PA package previously.

* Was this party on the regulated company's public awareness distribution list prior to the event?

Yes ▾

• If "Yes", justify "Unaware of regulation" if have received many PA packages or Face-to-face meetings

On this slide, if you choose Unaware of regulation, then you should know that some CER DP Reviewers will look back to see if you had sent them a Public Awareness package. It may be difficult to justify that they were unaware of regulation if they read the PA pamphlets over years, ESPECIALLY if you had a Face-toFace meeting with the landowners.

Example from a Vehicle Crossing Report in OERS

- **Provide justification for the causes selected as well as any additional details or explanation that would help the CER to better understand the basic causes of this event**

"Landowner did not think they needed consent as they were not performing ground disturbance and, on the contrary, were adding cover."

- **What is the company teaching Landowners:**
 - **information on driving over your pipeline?**
 - **information on adding or removing cover?**

In this example of a Vehicle Crossing, where we ask you to justify the causes you selected, we received this answer: *Landowner did not think they needed consent to drive a vehicle across the pipeline, as they were not performing ground disturbance but, on the contrary, were adding cover.* If you write that, then we'll want to know: Where is the misunderstanding stemming from? I.e., what is your company teaching Landowners -- Are you providing information on driving over your pipeline? Are you providing information on adding or removing cover?

Corrective and Preventive Actions

Corrective/Preventive Actions

Instructions

Check all that apply. Click on the arrows to expand each group of items or click "Expand all" to show all selections.

Expand All Collapse All

▶ **Corrective Actions** - actions taken at the event site to remove or control the cause(s) in order to eliminate the hazard, or minimize the associated risk.

▶ **Tier 1 Preventive Actions** - actions taken to address causes at additional locations where similar/identical situations exist in order to proactively eliminate the identified risk

▶ **Tier 2 Preventive Actions** - actions taken to address systemic causes; typically associated with changes that impact the entire company or pipeline.

Corrective and Preventive Actions: Actions taken at the event site to remove or control the cause(s)

Some examples can be:

- company rep located the pipe
- or written consent was provided

The Corrective and Preventive Actions tab also identifies Tier 1 and Tier 2 Actions.

Tier 1 is the "Actions taken to address causes at additional locations where similar or identical situations exist in order to proactively eliminate the identified risk"

This could be something like:

- Similar problems occurring at other sites
- Training might be required at more than one location
- Could be new policies or increased inspections
- More of different communication to external stakeholders may need to be done
- Or to correct the role or responsibilities at more than one location and so on

Tier 2 which we don't get a lot reported here is:

"Actions taken to address systemic causes; typically associated with changes that impact the entire company or pipeline."

- This section is referring to the modification or implementation of company wide processes or procedures

- For example:

- the control of identified hazards
- or developing competency requirements
- or to modify and implement a company wide processes or procedures for the

Management of Change

- Or simply internal communication across the company

Corrective/Preventive Actions

Company: "Since the contractor did not know exactly when the work was to start, he agreed to contact the Technician prior to the start of the work to have the line located and have a crossing agreement in place. The Contractor did not contact the Technician and proceeded with the work without the line markings or proper crossing agreement in place."

What about the Contractor?

Did the company stay in touch?

Did the company wait for them to call?

High risk: If extensive development, (over time or distance, multi-day, or multi-buildings)
= minimize risk?

The point is: Tell us how you will remove or control the cause to eliminate the hazard or at least minimize the associated risk.

In these cases, we want to know if the company continued to contact the Contractor?

Did the company stay in touch or did the company wait for the contractor or landowner to remember to call? (We appreciate you may get a LOT of these. But it's helpful if you let us know your efforts.)

For High risk activities such as an extensive development, (over time, over distance, multi-day, or multi-buildings), what did you do to minimize the risk? (E.g., did you erect a fence to stop the contractor from going near the pipeline? Did you stay in touch with the contractor? Did you stay on site throughout the work?)

The point is: Tell us how you will remove or control the cause to eliminate the hazard or at least how you did or will minimize the associated risk.

Most seen:

Tier 1 Preventive Actions - actions taken to address causes at additional locations where similar/identical situations exist in order to proactively eliminate the identified risk

✓ No tier 1 preventive actions taken

Tier 2 Preventive Actions - actions taken to address systemic causes; typically associated with changes that impact the entire company or pipeline.

✓ No tier 2 preventive actions taken

1. Tier 1 example?

2. Tier 2 example?

This is what we usually see in our question as to what Tier 1 or Tier 2 Preventive Actions you chose to undertake: No preventive actions taken at all! But, lately, we've started to see a couple of each, which is good news.

1. Do we have any companies that would like to share a quick Tier 1 example?
2. Would any companies be willing to share a quick Tier 2 example?



Official Languages Act (1969)

- Official Languages Act (1969)
- Part IV of the Act sets out criteria on how services must be offered in both Official Languages upon request
- OERS reports may be submitted in English or French

Wrap up: Regulated companies can submit the OERS reports in both official language of your choice, English or French.



Thank You

Thanks for your time.
As always, we're available if you have any questions.