

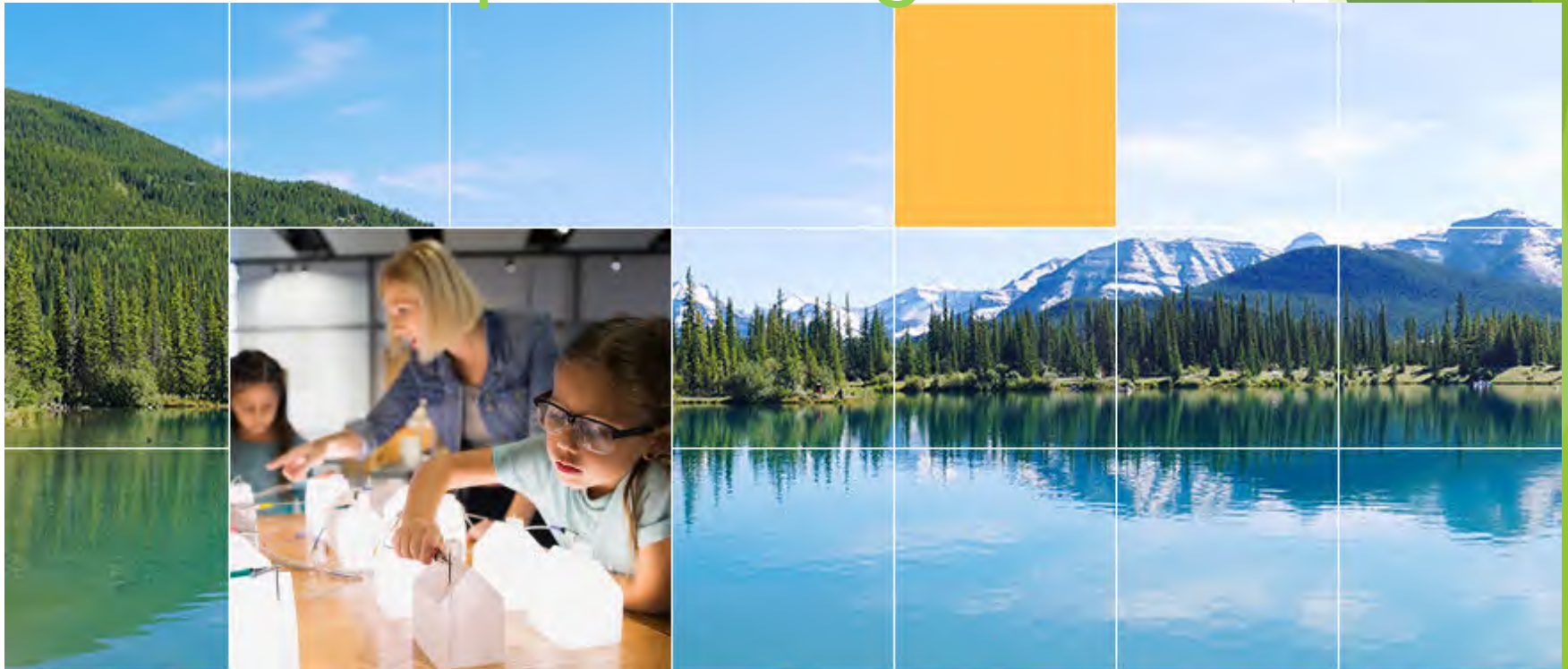


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Using Management System processes to Adapt DP Programs





Presentation Outline

1. What we have covered in past presentations
2. From gathering information to improving DP Programs
3. The quality requirements in the OPR
4. Identifying hazards : the case of Agricultural Activity
5. Adapting to surroundings: Assessing third party projects
6. Developing contingencies
7. Conclusions



What we covered last time: How systems learn

How data gathered can be used to build and improve Damage Prevention Programs

- Contravention reports
- Damage to pipe & 2nd party incidents
- ROW Patrol reports
- #, type & location of requests for consent
- # of Locates
- PA engagement Activities
- O & M Activities
- 3rd Party complaints & requests, surveys
- Class location surveys

Inputs

- Goals & targets
- Report/Trending
 - Stakeholder feedback surveys
- Gather and share input from other programs

Analyze & Evaluate

- Targeted engagement
- Process updates
- Damage prevention/ PA program updates
- Measures

Improve



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OPR Actions = Management System Processes

Anticipate

Identify hazards
& potential hazards

Monitor compliance

Set Goals, Targets and
objectives

Prevent

Evaluate risks &
implement
controls

Inspect & Monitor

Manage

Document Management
& Control

MOC

Management Review

Mitigate

Develop & Implement
Controls

Internal / External
communication



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Management Systems Required by the OPR

Damage Prevention, Emergency Management, Pipeline Integrity,
Environmental Protection, Security

Anticipate

Identify hazards
& potential hazards

Monitor compliance

Set Goals, Targets and
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Prevent

Evaluate risks &
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Quality, adaptability & consistency

- **6.1 (1)** A company shall establish, implement and maintain a management system that
 - (a) is **explicit, comprehensive and proactive**;
 - (b) integrates the company's operational activities and technical systems with its management of human and financial resources;
 - (c) applies to all the company's activities involving the design, construction, operation or abandonment of a pipeline and to the programs referred to in section 55;
 - (d) ensures coordination between the programs referred to in section 55; and
 - (e) **corresponds to the size of the company, to the scope, nature and complexity of its activities and to the hazards and risks associated with those activities.**
- **6.5 (2)** In this section, a reference to a **process** includes any procedures that are necessary to implement the process.
 - (3) The company shall document the processes and procedures required by this section.





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Hazard ID, Agricultural Safety and Depth of Cover (DOC)

DPR-O

s.7 Even if the condition set out in paragraph 13(1)(a) of the [Canadian Energy Regulator Pipeline Damage Prevention Regulations – Authorizations](#) is met, when the operation of vehicles or mobile equipment across a pipeline at specific locations for the purposes of performing an agricultural activity could impair the pipeline's safety or security, the pipeline company must identify those locations and notify the following persons in writing of those locations:

- (a) landowners of the specific locations in question; and
- (b) persons that are engaged in agricultural activities, rent or lease the land or work as service providers or employees at the specific locations in question.





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Proactive Hazard Identification & Agricultural Activity

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Discussions about Agricultural Safety could include:

- When was the last DOC survey on agricultural land?
- How often does your company conduct DOC surveys? What triggers a DOC survey?
- Does your company look into the equipment are farmers using over the pipeline?
- Have there been droughts or floods that may impact DOC?
- Have farmers reported concerns? Or have issues been noted on patrols?



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Adapting for work happening around pipelines

OPR section 6.5(1)(f) establish and implement a process for developing and implementing controls to prevent, manage and mitigate the identified hazards, potential hazards and risks and for **communicating those controls to anyone who is exposed to the risks;**

- Consider project complexity
- Coordination of activities;
- Contractor oversight and scheduling;
- Consistent communication of:
 - Controls & basic emergency measures
 - Written safety practices
 - Project documentation- agreements, inspections
- Managing changes
- Developing contingencies





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Anticipating for project safety: Contingency planning

OPR s. 6.5(1)(t) establish and implement a process for developing contingency plans for abnormal events that may occur during construction, operation, maintenance, abandonment or emergency situations;



Planning for how your company would manage:

- Identify roles and authorities
- changes or unforeseen events could impact the project?
- Set wet weather shutdown criteria
- Severe weather events like forest fires, floods
- Increase in seasonal traffic and more people in the area than planned for?

Do you need a traffic plan?

More signage?

More PA/EM material?

- Finding “ghost infrastructure” during an excavation
- How is it documented? How is it determined to be safe?



Conclusions

- DP programs need to anticipate, prevent, manage and mitigate hazards from human activity around pipelines
- CER expects that company DP programs are learning through MS processes and adapting to the activity happening around them.
- OPR has quality requirements for company MS and DP Programs.
- CER will continue to use these requirements to guide our evaluations during CVAs.

- **Thank you!**



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