

Directive 071 Frequently Asked Questions.

Question: Are the setback designations based on ERCBH2S calculations or the licensed values?

Answer:

ERCBH2S is for calculating the response zones for sour operations and is intended for emergency planning purposes only. Operating conditions are used in ERCBH2S to ensure that the EPZ is representative.

Setbacks are based on **licensed values** for all cases. The calculation in ERCBH2S uses licensed values to calculate a release volume using the current method of determining a setback. This functionality was included in ERCBH2S to assist licensees by providing a consistent method for determining compressibility (Z), in order to reduce errors in level determination and setback distances.

Question: Do EPZs have to be recalculated for abandonment operations?

Answer:

If the well is a sour gas well and has not been suspended in accordance with Directive 013, it **will** need an ERP.

For wells that cannot flow to the surface without mechanical assistance, the H₂S release rate is considered zero. Therefore ERCBH2S can not calculate an EPZ.

If the well has been suspended in accordance with Directive 013, it will not need to be included within an ERP.

If an existing production ERP is in place for the well, and it addresses public protection measures to take place during abandonment operations, then this ERP can be used for the operations. Should the existing production ERP not address abandonment operations then a new site specific ERP / supplement for the abandonment operations will be required.

Question: When relicensing pipelines associated with a production facility, does the ERCBH2S model need to be run in order to calculate the EPZ size?

Answer:

When relicensing pipelines to reflect a change in pipeline operating parameters, the ERCBH2S model must be used to calculate the EPZ size. It is permissible to continue using the public protection measures in the existing production facility ERP (as stated in Bulletin 2008-15). Any changes in EPZ size must be communicated in accordance with Directive 071.

Question: How is a new well or pipeline tied into an existing production facility calculated, and which EPZ calculation is used?

Answer:

New wells or pipelines that will tie into existing approved production facilities that have an ERP must be submitted to the ERCB for approval prior to them being included within the production ERP. This can be done via:

- 1) as a supplement with its EPZ calculated using ERCBH2S OR
- 2) as a standalone site-specific production ERP that bridges into the existing plan OR
- 3) in the case of application in a hearing process, to meet the specific direction of the Board

Question: Do I need to attach the ERCBH2S Export page to my Directive 056 application?

Answer:

No. You will use the ERCBH2S calculation result in the Directive 056 application, but you only need to attach the ERCBH2S CSV export file to your ERP submission to the ERCB's Emergency Planning and Assessment group. Submissions should be sent to EPAssessment@ercb.ca at the time of the submission of your ERP.

Question: The 'Batch Export' direction mention using DDS registration number as part of the file name. What is a DDS registration number?

Answer:

In October 2006, the ERCB introduced the Digital Data Submission (DDS) system for licensees/applicants to use when registering an ERP. When an ERP is registered electronically in this system, a DDS registration number is issued and provided back to the licensee/applicant. In order for a licensee/applicant to use DDS, it must be set up with a DDS account and appoint a DDS administrator

Question: Can a licensee partially update its existing production ERPs using the 2009 Directive 071 response requirements, but maintaining its nomograph calculations?

Answer:

Yes a licensee can update its existing ERPs in such a way.

The DDS registration must be revised accordingly (please reference the Emergency Response Matrix for details).

The accompanying cover letter must be attached detailing that the ERP is written to both the 2005 and 2009 Directive's.

Please note that EPA considers ERPs written in such a fashion to be updates and WILL NOT issue an approval letter for such ERPs until it is written to the full compliance of Directive 071, 2009 edition.