

GENERAL ORDER
2021-0024-01
Section 49 *Oil and Gas Activities Act*

Issued to:

Alcan Fluid Disposal Ltd.
Box 6354
Fort St. John, BC V1J 4H8

Attention: Mr. Ron Baker

Order:

Pursuant to section 49(1)(d) of the *Oil and Gas Activities Act* (the Act), I, Patrick Smook, order that Alcan Fluid Disposal Ltd. (Alcan) must:

1. Conduct a tabletop or functional exercise for the Kyklo and Evie fields as described in clause A.4.10 of Annex A of CSA Z246.2 (the Exercise) on or before May 31, 2021.
2. On or before 4:00 PM on March 31, 2021 submit the date, time, location and description of the Exercise.
3. On or before April 30, 2021 submit updated emergency response plans (ERPs), including the core ERP and the supplemental ERP for the Kyklo and Evie fields.
4. Submit the information required by items 2 and 3 electronically to C&E@bcogc.ca.

Conditions:

- A. This order shall remain in effect until amended or terminated in whole or in part by the Commission.

Reasons:

I make this Order for the following reasons:

1. Alcan is a permit holder under the Act including a facility and a well in the Kyklo field and one well in the Evie field.
2. Pursuant to section 4(2) of the Emergency Management Regulation (EMR), a permit holder must conduct a full-scale (major) exercise, as described in clause A.4.10 of Annex A of CSA Z246.2, at least once every 3 years.
3. Pursuant to section 4(3)(a) of the EMR, a permit holder must conduct a tabletop or functional exercise, as described in clause A.4.10 of Annex A of CSA Z246.2, in each year that an exercise referred to in section 4(2) is not conducted.

4. Pursuant to section 4(4) of the EMR, a permit holder must, at least 30 days before conducting an exercise referred to in section 4(2) or 4(3), provide notice to the Commission along with a description of the exercise to be conducted.
5. Pursuant to section 5(1) of the EMR, a permit holder must prepare and maintain a plan (ERP) in accordance with CSA Z246.2.
6. Pursuant to section 8(1)(a) of the EMR, a permit holder must review and, if necessary, update the information included in any ERP at least once a year.
7. Pursuant to section 15(4) of the EMR, a permit holder must, within 30 days after reviewing a plan under section 8, submit to the Commission, in both paper and electronic form, the following, as applicable:
 - (a) a copy of any information updated under section 8(1);
 - (b) if no information is updated under section 8(1), a record showing the date the plan was reviewed and the name of the permit holder's representative who is responsible for the review.
8. On November 3, 2020, Commission records indicated Alcan was 2 days overdue to conduct an exercise for the Kyklo and Evie fields.
9. On December 11, 2020, the Commission received notification from Mr. Ron Baker of Alcan that a tabletop exercise would be conducted on January 29, 2021.
10. On January 25, 2021, Mr. Baker of Alcan advised the Commission: "We are very busy right now. We are in the process of divesting ourselves of Alcan. It will either be sold or the assets sold and the wells abandoned. At this time, we are not spending any monies to sustain Alcan and we have cancelled our intended exercise for the Kyklo well. Thank you for your understanding."
11. Mr. Baker is a Director of Alcan.
12. On January 26, 2021, the Commission e-mailed Mr. Baker requesting documentation of a sale and the possibility of an exercise extension.
13. On February 1, 2021, a second e-mail was sent to Mr. Baker requesting a response to the January 26, 2021 e-mail.
14. On February 9, 2021, the Commission e-mailed a notice to Alcan advising its core and supplemental ERP's were overdue for review/update.
15. As of March 15, 2021, the Commission has received no response from Mr. Baker and Alcan regarding its exercise requirement or plan reviews.
16. I am of the opinion that Alcan has failed to comply with sections 4 and 15(4) of the EMR.

Review and Appeal:

Alcan may request a review of this order under section 70 of the Act by submitting a request for review to ogc.determinationreviews@bcogc.ca.

Alcan may appeal this order to the Oil and Gas Appeal Tribunal under section 72 of the Act. The process for appeals may be found at www.ogat.gov.bc.ca and a notice of appeal may be sent to the Oil and Gas Appeal Tribunal at:

Oil and Gas Appeal Tribunal
PO Box 9425 Stn Prov Govt, Victoria, BC, V8W 9V1



Patrick Smook
Executive Director, Compliance and Enforcement
Oil and Gas Commission

DATED AT Fort St. John, in the Province of British Columbia, this 15th day of March, 2021.