

INDUSTRY BULLETIN 2018-30

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Wildlife Exclusion Fencing Requirements

Effective Date: Jan. 1, 2019

The BC Oil and Gas Commission (Commission) is clarifying fencing requirements around drilling sumps.

Section 51(2) of the <u>Drilling and Production Regulation</u> (DPR) requires "a well permit holder who deposits into an earthen pit drilling fluids that may be harmful to domestic livestock or big game must maintain the pit so as to prevent domestic livestock or big game from ingesting the fluids".

Where necessary, fencing is the primary tool used by permit holders to satisfy this requirement.

The Commission continues to evaluate and modify its management of the Province's energy resources by initiating improvements that will safeguard the public and environment, maintain responsible energy development, and improve regulatory performance. To that end, the development of clear expectations for fencing around drilling sumps for the purpose of wildlife exclusion has been identified as an area for improvement.

Where wildlife exclusion fencing is required under the DPR, installation of snow fencing is not an acceptable method of excluding wildlife from the site. Fencing consistent with the following parameters will be considered acceptable:

Fence fabric:

32 centimetre (12 $\frac{1}{2}$ ") gauge high tensile galvanized steel woven wire (commonly referred to as 'page wire'), or similar material, to achieve the same results. Minimum height of 2.5 metres (8').

Posts:

Either a minimum diameter of 10 centimeters (or 4") and 3.5 meters (or 12') in length for pressure treated wood or steel posts with a minimum diameters of 5 centimeters (27/8") and 4.5 meters (14'10") in length, depending on installation conditions.

Access / egress:

As it pertains to personnel and/or equipment access, the expectation is for the permit holder to choose a gate, or set of gates, that will achieve continued and safe access and egress while maintaining a minimum height of eight feet to prevent wildlife or livestock entry to the area.

In the event that wildlife or livestock enter the fenced off area, the fencing should include a one-way exit gate (or similar feature), built during construction, to facilitate safe exit from within.

An example of acceptable fencing is shown below:



Regular maintenance and monitoring will support the continued effectiveness of the fencing structure until the area is decommissioned according to the appropriate criteria.

As of Jan. 1, 2019, this fencing requirement is applicable to all newly constructed sumps with the following exceptions:

- Locations that are manned 24 hours per day, or
- Sumps that will be decommissioned within 14 days of the site no longer being manned 24 hours/day, or
- Sumps that have been demonstrated through laboratory analysis to not contain any substance in a
 concentration exceeding livestock standards of the <u>Contaminated Sites Regulation</u> schedule 3.2, and have
 passed accepted toxicity assessment protocols without treatment.

Alternative wildlife exclusion methods may be approved by the Commission on a site specific basis.

Should you have any questions regarding this Industry Bulletin, please contact:

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