



# PENGROWTH

PENGROWTH ENERGY CORPORATION

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October 20, 2011

Energy Resources Conservation Board

Calgary Office, Suite 1000

5 Street SW

Calgary, Alberta T2P 0R4

**Attn: Brian Temple, Incident Investigator**

**RE: Pipeline Failure Investigation  
Additional Information Request**

**Location: 08-35-063-11 w5m**

**FIS#: 20111314**

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This correspondence is in response to your letter dated October 6, 2011 requesting additional information relating to Pengrowth's emergency response procedures associated with the pipeline failure on the above line. Pengrowth hereby provides the following detailed response to the ERCB as requested:

- a) Please confirm if a copy of the corporate ERP was available at the Judy Creek operating area at the time of the incident?**

A copy of Pengrowth's corporate ERP was available at the time of the incident. The ERP is located in hardcopy at the Judy Creek Production Complex control room and in the Judy Creek administration office. The ERP is also accessible online through Pengrowth's intranet site.

- b) Please explain why the ERP did not get activated until 4:45 pm?**

The emergency response plan was activated at 4:15 pm when the emergency was identified. From 4:15 pm until 4:45 pm field activities were being coordinated to isolate and contain the incident. At 4:45 pm the ERP was expanded to include corporate response.

- c) Have the discussions with the ERCB taken place with regards to issuances of a Fire Hazard/Closure order as stated on page 4 of section 7 of the ERP?**

Discussions did not take place with the ERCB regarding issuance of a Fire Hazard/Closure order as it was deemed unnecessary. The incident and

associated hazards were contained within the EPZ. Pengrowth established roadblocks on all access points to ensure public safety.

- d) How was the decision made regarding the location and placement of roadblocks? What response position made the decision to isolate the area and when?**

The decision regarding where and when to establish road blocks was made by the first responder at approximately 4:20 pm. The decision was made after assessing the scene for hazards and based on knowledge of road access points. At 4:25 pm roadblocks were installed by a third party electrical contractor on both ground access points into 08-35-63-11 as directed by the first responder.

- e) Page 4 section 4b) of the post incident report (the report) states that no members of the public reside within the EPZ, and as such notification was not required. Please explain how the EPZ size and boundaries were determined and were there any landowners requiring egress through the EPZ?**

The boundaries of the EPZ were calculated using the ERCBH2S modeling software. The software determines boundaries based on the following site specific factors;

- The nature of the product release
- The volume release
- The product flow rate
- Weather or metrological conditions
- Topography

The predicted EPZ was determined to be appropriate based on the emergency. No landowners required egress through the EPZ associated with the 08-35-63-11 w5m failure.

- f) Notification to the ERCB: the report states that the ERCB was notified through AEMA. It is the licensee's responsibility to contact the ERCB directly, pursuant section 11.1.1 subsection 4) of D71 as well as section 3.4.1 of Pengrowth's Corporate ERP. Please explain the gap in notification.**

The reason that the ERCB was contacted via the AEMA was due to the circumstances surrounding the incident. There was an SRD fire tower located in close proximity to the incident. The fire tower personnel identified the incident and following protocol immediately notified Swan Hills fire

department. The Swan Hills fire department following protocol immediately notified AEMA. AEMA following protocol notified ERCB. The Pengrowth regulatory liaison was mobilizing to location and arrived on site at 5:45 pm. From 5:45 pm to 6:46 pm the liaison was offering ground level assistance and gathering data so that the incident could be accurately reported to the ERCB. Pengrowth intended on reporting the incident directly as soon as accurate details were available.

A learning from this incident is to empower the Regulatory Liason to delegate onsite tasks to free up time to ensure all the appropriate regulatory body notifications are completed.

- g) What response position has the decision making authority to downgrade emergency? Please direct me to the appropriate section in the Corporate ERP where this responsibility is clearly outlined.**

The response position that has decision making authority to downgrade an emergency is the Crisis Manager in consultation with regulators via the regulatory liaison (as outlined in section 3.5). It has been identified that section 3.1 of the ERP requires modification (see action plan below). Section 3.1 page 3 needs to incorporate the last paragraph from section 3.2 page 5 which states "The decision to downgrade any level of emergency will be made by the Crisis Manager in consultation with the appropriate regulators".

- h) The investigation report does not provide detail regarding the steps that were taken to downgrade the emergency. Was downgrading the incident coordinated with the ERCB as required by section 14.5.1 subsection 20) and 21) of the D71?**

The original incident classification was determined utilizing the classification matrix (ERP section 3.1) in conjunction with the ERCB on call officer. The emergency was downgraded in consultation with the ERCB Field Inspector (Adam Payzant) and ERCB Incident Investigator (Brian Temple) who were on location.

- i) The report does not provide details around the activation of the incident command system such as**

- a) **Who took the initial control** – Initial control was taken by the First Responder Randy Trofimuk.
- b) **Transfer of command** - Randy assessed the situation and played the role of incident commander until relieved by Eric Pratt. Eric took over Incident commander role from Randy at 4:29 pm and was subsequently relieved by John Hestermann who assumed role of Incident Commander for the remainder of the incident at 5:17 pm.

- c) **Who was in charge of decision making** – Throughout the incident the Incident Commander was in charge of decision making.
- d) **Assignment of responsibilities** – The Incident Commander assigned roles within the ICS structure. The role assignments were based on the needs of the incident.

- j) **The report and the sequence of events summary does not provide details of external notifications by the licensee and when they were implemented (specifically, AEMA, WCSS, Fire Department, etc).**

The following details notifications as requested;

AEMA – Was notified by the Swan Hills Fire Department after they had received a call from SRD fire tower personnel.

WCSS – Pengrowth contacted third parties who specialize in spills associated with water bodies, specifically, Clean Harbors, Worsley Parsons and SWAT. Crews arrived on location on Monday June 27<sup>th</sup>. WCSS creek booms were procured and utilized during the incident.

Swan Hills Fire Department – As outlined in section f) above the fire department was contacted by SRD fire tower personnel.

OHS – Was notified by ERCB through their fan out notification.

Alberta Environment – Was notified by Pengrowth regulatory liaison at 8:39 pm.

- k) **A gap was identified in comparison of action to be taken during the incident (sections 7.11 and 7.12 of the ERP) with the actual sequence of events. Specifically please clarify why the level of emergency was not determined until 7:05 pm after the fire has been brought under control?**

The first responder did not assign a formal level of emergency, the action plan below addresses the identified gap.

The emergency was initially assessed as level 2. At 6:46 pm the status of the incident was discussed with the ERCB, a decision was made to classify the incident as level 1. At 7:05 pm a meeting was held at the On-site command post to review progress and assess level of incident. The incident remained classified as level 1.

**l) Has the response team conducted a post incident debrief to discuss the following?**

- a) The emergency response actions that occurred during the incident as described in the corporate ERP – A debrief has been held specific to the ERP. The results of the meeting are listed below.**
- b) Identified strengths and areas of improvement pertaining to emergency response**

**Strengths**

- Operations quick and effective response to isolate the incident minimized consequences
- Early decision to obtain aerial support to assess the incident mitigated consequences
- Mobilizing of equipment and resources – Got Big Quick
- Internal notifications were made efficiently
- Decision to bring in third party failure investigation specialist
- Decision to get spill experts involved ASAP

**Opportunities for improvement**

- Documentation was identified as an area that can be improved. During future incidents an administrator will be assigned to the incident immediately to help with documentation
- The first responder did not formally classify the incident.
- Road blocks should have been manned throughout until alert status was achieved
- A designated area should have been assigned for regulators and media
- Tours and debriefings should have been scheduled daily to more effectively manage resources
- Pengrowth did not prepare a media briefing as the incident was classified as level 1, media interest was not anticipated
- Pengrowth did not have immediate access to an inverted weir for spill containment and clean-up

- c) Action items specific to the response and target dates for implementation?**

Description of action	Target Date	Status
Update section 3.1 of Corporate ERP to include statement from section 3.2 "The decision to downgrade any level of emergency will be made by the Crisis Manager in consultation with the provincial regulators"	December 31, 2011	
Section 4.3 page 6 level 1 responsibilities of the Crisis Manager will be expanded to include consideration of media interest.	December 31, 2011	
Review the importance of documentation during an incident at November safety meetings	November 2011	
Develop incident examples for review and classification during November safety	November 2011	
During an incident empower the Regulatory Liaison to delegate onsite tasks to free up time to ensure all the appropriate regulatory body notifications are completed.	Ongoing	
Assign administrator for documentation support on future ERPs	Ongoing	
Procure inverted weir for emergency response	November 15, 2011	

Pengrowth is committed to pro-actively meeting regulatory requirements and strives to achieve excellence within all of its operations. I trust that the above information completes the requirements laid out in the ERCB's investigation letter.

If you require additional information or have any questions regarding this matter, please feel free to contact me at 780-333-7150 (office) or 780-706-5153 (cell) or via e-mail at [shelley.maclean@pengrowth.com](mailto:shelley.maclean@pengrowth.com)

Sincerely,  
**PENGROWTH ENERGY CORPORATION**



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