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Alberta Energy Regulator  
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**Re: Shell Canada Report on Action Plan for ERCB Decision 2013-009  
Waterton 68 Applications for Pipeline and Facilities Licences**

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Shell Canada Limited (Shell) received approval from the Alberta Energy Regulator for the Waterton 68 pipelines and facilities on May 28, 2013 in ERCB Decision 2013 ABERCB 009. Appendix 4 to the Decision set out an Action Plan with action items and requirements for follow-up. Shell last reported on the status and evidence of completion of the Action Plan items on June 12, 2015. The following is an update to that report.

**1. RWDI Recommendations: Partially Complete, Actions Ongoing**

The AER directed Shell to install the first perimeter monitor at the Waterton 68 well site before producing the Waterton 68 well, with the other perimeter monitors being installed after the start of production and testing of the initial perimeter monitoring system. The perimeter monitoring system at WT-68 is currently operational and is being piloted to test viability long-term and at other sites. Shell will be evaluating performance of the system over the coming months.

The following *Table 1: RWDI Recommendations Report* provides the most recent status of each of the nine RWDI recommendations, with updated information noted in purple font. Shell will continue to provide regular updates on these initiatives through the Waterton Advisory Group (WAG) meetings.

**2. RWDI Recommendations Progress Updates: Ongoing**

The progress of implementation of the RWDI Recommendations have been discussed at all WAG meetings since the approval of the Waterton 68 pipeline and facility on May 28, 2013.

- Attached please find the following WAG Meeting Minutes from the October 28, 2015 meeting:
  - *WAG 28 October 2015 Meeting Notes.pdf*

Development of new wells and infrastructure in the Waterton field is presented, when required, to the New Development Sub-Committee of WAG.

- Attached please find the following NDSC Meeting Minutes from the October 14, 2015 meeting:
  - *NDSC Notes – Oct 14 2015.pdf*

Table 1: RWDI Recommendations Report

RWDI Recommendation Number	Recommendation Description <sup>a</sup>	Shell Updates (As of November 10, 2015)	Status
#1	A new meteorological station, properly sited with respect to fetch and exposure, is recommended for the Screwdriver Creek Valley (SCV). The utility of this station should be evaluated after one year. This station could be part of the continuous ambient air quality monitoring station in Recommendation #2.	<ul style="list-style-type: none"> <li>Shell has retained RWDI to perform the one-year review for the SCV continuous air monitoring station.</li> <li>A report was prepared by RWDI in September, 2015. (See attached)</li> <li>Results and conclusions from the report were shared with WAG at the October 28, 2015 meeting.</li> <li>Although the RWDI report concluded that the station could be removed at Shell's discretion, Shell has decided to keep it operational for another year to support future development planning.</li> </ul>	Complete
#2	Install a permanent continuous ambient station that monitors H <sub>2</sub> S and SO <sub>2</sub> and meets all ERCB/AESRD AMD measurement and reporting requirements. The utility of this station should be evaluated after one year. This station could include the meteorological station in Recommendation #1.		
#3	Four perimeter H <sub>2</sub> S monitors should be installed at each of the following six well sites: WAT junction, 6-16-6-2 W5M; TX-5-20, 5-20-6-2 W5M; TX-6-17, 6-17-6-2 W5M; WT-61, 10-7-6-2 W5M; WT-68, NE-1-6-3 W5M; and CA 6-12, 6-12-6-3 W5M.	<ul style="list-style-type: none"> <li>The perimeter monitoring system at WT-68 is currently operational and is being piloted to test viability long-term and at other sites. Shell will be evaluating performance of the system over the coming months.</li> </ul>	Ongoing
#4	Consider relocating the existing DAP unit to locations in the SCV that are downwind of sites where flaring activities are taking place in order to self-monitor and evaluate the downwind concentrations from these activities, or not use the units at all.	<ul style="list-style-type: none"> <li>Shell is currently in the process of stakeholder engagements to support the eventual decommissioning of the DAP unit.</li> </ul>	No Further Action Required At this Time
#5	Shell's participation in any future regional ambient air and environmental monitoring networks is recommended.		No Further Action Required At this Time

RWDI Recommendation Number	Recommendation Description <sup>a</sup>	Shell Updates (As of November 10, 2015)	Status
#6	Post any new continuous H <sub>2</sub> S, SO <sub>2</sub> and meteorological measurements from the SCV to a shared website for public internet access based on averaging periods of 15-minutes, 1-hour and 24-hours and have the ability to generate summary reports.	<ul style="list-style-type: none"> <li>The final results from the SCV continuous air monitoring station one-year pilot study were shared with WAG at the October 28, 2015 meeting.</li> </ul>	Complete
#7	Summarize and make public the results of historical ambient monitoring readings in the Screwdriver Creek Valley area, including meteorological and continuous air quality data from 2008 onwards.		Complete
#8	Provide a public tour of the Shell Waterton Complex ambient station(s) and Control Room with demonstration of monitoring and alarm systems.		Complete
#9	Undertake a one-time ambient survey of common VOC's such as BTEX compounds at the Texaco 5-20, Texaco 6-17 and WT-61 well sites in the Screwdriver Creek Valley, at upwind and downwind locations on the lease boundaries, and compare the measured levels to their respective AAAQO and typical published levels.		Complete
NOTE: <sup>a</sup> For full details on the recommendations outlined herein, refer to the RWDI report entitled "Ambient Air Monitoring Program Design: Screwdriver Creek Valley" (dated December 5, 2012).			

We trust that this information meets your current needs. If you would like to further discuss the information contained herein, please do not hesitate to contact Glenda Prudom by phone at 587-233-4508 or via email at [glenda.prudom@shell.com](mailto:glenda.prudom@shell.com).

Sincerely,

A handwritten signature in blue ink, appearing to be 'G. Prudom', with a stylized flourish at the end.

Glenda Prudom, M.Sc.  
Senior Regulatory Specialist  
Shell Canada Limited