



Release Reporting

Document Number: FHHP00002	Procedure – Administrative	Applies To: Fort Hills
Revision Date: 2018/01/31 Revision: 2 Review Cycle: 3 years	Document Owner (Title): Manager Environment & Regulatory Compliance	

Purpose/Scope

To define the requirements for reporting releases (solid, liquid or gas) into the environment and the appropriate internal updates communication protocol in the event of a major incident.

Fort Hills' philosophy is to reduce all releases to zero, or to as low as reasonably achievable. It is understood that limitations exist on certain types of machinery, equipment, or situations that currently preclude achieving a zero release target when applying conventional release thresholds. Accordingly, the release management philosophy accepts current industry practices, practical considerations, and engineering or operational limitations as reasonable risks. Specific situations that require immediate regulatory notification are:

- Release of a substance that has caused, is causing, or may cause an adverse effect
- Release of a substance into a water body (as defined in the [Water Act](#) and the [Release Reporting Regulation](#))
- Release of oil, water, or unrefined product off site
- Release of oil, water, or unrefined product exceeding two cubic metres on site
- A liquid spill (as defined in the [Oil Sands Conservation Rules](#))
- Well flowing uncontrolled
- Any release off site

Compliance

This document applies to all individuals required to report a release at Fort Hills.

Roles and Responsibilities

The following individuals and groups have the following roles and responsibilities:

- | | |
|--------------------------|---|
| Document Owner | <ul style="list-style-type: none">• Ensures this document is reviewed according to the required revision cycle.• Ensures the document is updated to accommodate changes to Suncor, provincial, and federal regulation.• Ensures the document is updated to mitigate risks found as the result of an incident. |
| Document Approver | <ul style="list-style-type: none">• Ensures this procedure is necessary and that it aligns with management and company direction. |

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References

- [Water Act](#)
- [Release Reporting Regulation](#)
- [Oil Sands Conservation Rules](#) (OSCR), section 13
- [SUN-00010](#), Incident Management Standard
- [SUN-00189](#), Corrective Actions Standard
- [Environmental Protection and Enhancement Act](#), part 5 and section 110
- [SUN-00059](#), Classification of Loss of Primary Containment Incidents Guideline
- [SUN-00119](#), Loss of Primary Containment (LOPC) Quantity of Release Estimate

Terms, Definitions and Acronyms

The following terms, definitions and acronyms are used in this procedure:

AER	Alberta Energy Regulator
CIC	Coordination and Information Center (1-800-222-6514)
EH&S	Environment Health and Safety
Environment	The components of the earth including: <ul style="list-style-type: none"> i. Air, land and water ii. All layers of the atmosphere iii. All organic and inorganic matter and living organisms iv. The interacting natural systems that include components referred to in (i) and (iii)
Flaring	Combustion of gases to flare system above and beyond the gas used for keeping pilot running; including flaring as a result of a process upset
H₂S	Hydrogen sulfide
Liquid Spill	Release of a substance that has caused, is causing, or may cause an adverse effect or a release to a waterbody (as per OSCR).
LOPC	Loss of Primary Containment
MSRCP	Monthly Spill Reporting Criteria Pilot Project (Appendix A)
PSV	Pressure Safety Valve
Refined Substance	Substances Fort Hills brings to site, including, but not limited to hydrogen peroxide, glycol, caustic, hydrochloric acid and hydraulic fluid.
Release	An unplanned, unintentional or regulatory unauthorized release of a solid, liquid or gas into the environment, or into a location that does not usually contain that material including secondary containment. Alternate terms for release include but not limited to: spill, dispose, spray, mist, inject, inoculate, abandon, deposit, leak, seep, pour, emit, empty, throw, dump, place and exhaust.

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*Continued on next page**Terms, Definitions and Acronyms (Continued)*

TDG	Transportation of Dangerous Goods (Appendix B)
Unrefined Substance	Substances that are produced as part of Fort Hills operational activities, such as bitumen, produced water and boiler feed water.
Venting	The intentional controlled release of uncombusted gas (venting from a PSV could be classified as an LOPC event).

Procedure**1. Release Reporting**

Note 1: Release reporting requirements must consider both internal and external stakeholders and must be escalated through the internal process first. In the event of a release or environmental emergency, Fort Hills Environmental Affairs must be immediately contacted at (780) 743-6840.

Note 2: Internal reporting is governed through [SUN-00010](#), Incident Management Standard.

Note 3: Internal communication protocol for incident updates during an event are included in Appendix D.

Responsibility**Step****Action**

Employees and Contractors

1.1

Email the following information to Fort Hills Environmental Affairs at FHENVAFFAIRS@suncor.com:

- Your name
- Company and operational area
- Your phone number
- Volume and type of substance released (m³)
- Start date and time of release
- End date and time of release
- Legal land description and immediate surrounding area
- Description of circumstances leading up to the release
- Immediate corrective actions taken to minimize or stop the event

Area Operations Supervisor

1.2

Ensure the safety of yourself and others in the area.

All

1.3

Use the following table to determine your next action.

If the release type is...	Then...
Liquid Release	Go to step 2, Liquid Release Reporting
Venting	Go to step 3, Venting Reporting
Flaring	Go to step 4, Flare Reporting

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2. Liquid Release Reporting

Responsibility	Step	Action
Area Operations Supervisor	2.1	Instruct the area operator to attempt to stop the source of the release if safe to do so.
Area Operations Supervisor	2.2	Initiate containment and clean up.
Area Operations Supervisor	2.3	Enter the incident into the incident management tool (Enablon). Note: Enter an event for all releases whether or not they are regulatory reportable (Appendix C).
Area Operations Supervisor	2.4	Complete the LOPC data form if applicable.
Area Operations Supervisor	2.5	Verify the clean-up of spills or releases has been thoroughly completed.
Environmental Affairs	2.6	If the release meets the criteria of the MSRCPP, record the details of the release using the MSRCPP form and submit to AER at the end of the month (see Appendix A).
Environmental Affairs	2.7	If the AER requests a final written Release Report Form or an Alleged Contravention Report Form, draft a report and submit to Legal Counsel before submitting to AER.

3. Venting Reporting

Responsibility	Step	Action
Area Operations Supervisor	3.1	Instruct the area operator to attempt to stop the source of the release if safe to do so.
Area Operations Supervisor	3.2	Contact Process Engineering and enter the incident information into the venting log. Note: In the comments section include: <ul style="list-style-type: none"> • Description of what happened • Volume and concentration of gas released • Duration of release • Date and time of event (including start and stop times) • The root cause of the incident • Actions taken to prevent reoccurrence • If the event was reported to AER by Fort Hills Environmental Affairs, include the CIC reference number

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Venting Reporting (Continued)

Responsibility	Step	Action
Area Operations Supervisor	3.3	Enter the event into the incident management tool (Enablon).
Area Operations Supervisor	3.4	Complete the LOPC data form.
Environmental Affairs	3.5	If the AER requests a final written Release Report Form or an Alleged Contravention Report Form, draft a report and submit to Legal Counsel before submitting to AER.

4. Flare Reporting

Responsibility	Step	Action
Area Operations Supervisor	4.1	Contact Process Engineering to calculate the volume released, duration and estimated NOx and/or H2S concentration.
Area Operations Supervisor	4.2	Enter details of incident into the flaring log. Note: Non-routine flaring will require the creation of an event in Enablon and the completion of an LOPC form.
Area Operations Supervisor	4.3	Email flaring log information to Fort Hills Environmental Affairs at FHENVAFFAIRS@suncor.com .
Fort Hills Environmental Affairs	4.4	Report flaring activity to CIC and state: THIS IS A NOTIFICATION AND NOT A CONTRAVENTION.

End of Procedure

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Appendix A – Monthly Spill Reporting Criteria Pilot Project (MSRCPP)

Spills, as per OSCR 13(1), that are greater than 2m³ and meet all the following criteria:

- Spills that enter impervious secondary containment (i.e., concrete, compacted clay liner, steel, lean oil sand) or approved containment
- Spills that are recycled/recovered back into an approved system
- Spills that do not result in loss of production
- Spills that do not result in injury or an adverse effect to the environment or to humans
- Spills that do not fall under Environmental Protection and Enhancement Act (EPEA) Regulations
- Spills that have been repaired by the end of the calendar month in which they occurred

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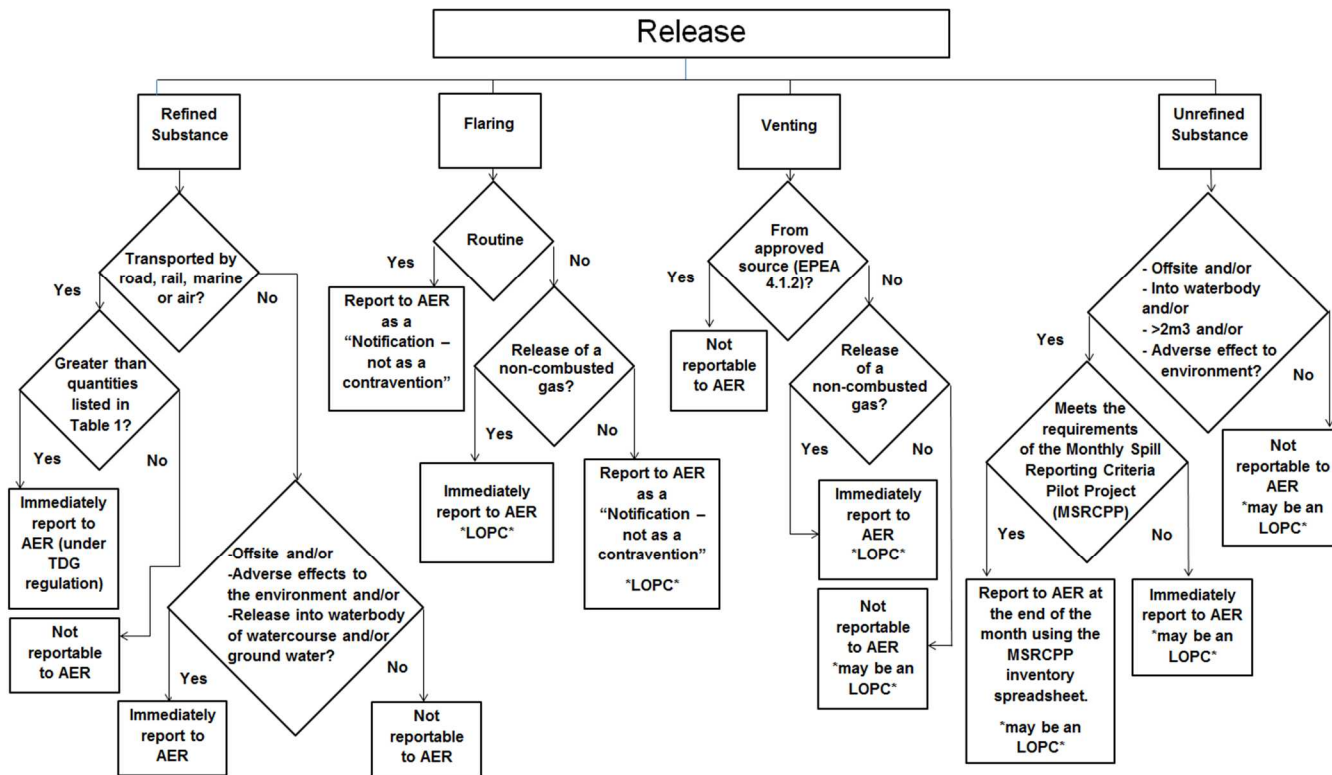
Appendix B – Transport of Dangerous Goods Act Reporting Regulations

Class	Packing Group or Category	Quantity
1	II	Any quantity
2	Not applicable	Any quantity
3, 4, 5, 6.1 or 8	I or II	Any quantity
3, 4, 5, 6.1 or 8	III	30 L or 30 kg
6.2	A or B	Any quantity
7	Not applicable	A level of ionizing radiation greater than the level established in section 39 of the "Packaging and Transport of Nuclear Substances Regulations, 2015"
9	II or III, or without packing group	30 L or 30 kg

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Appendix C – Regulator Release Reporting Flow Chart

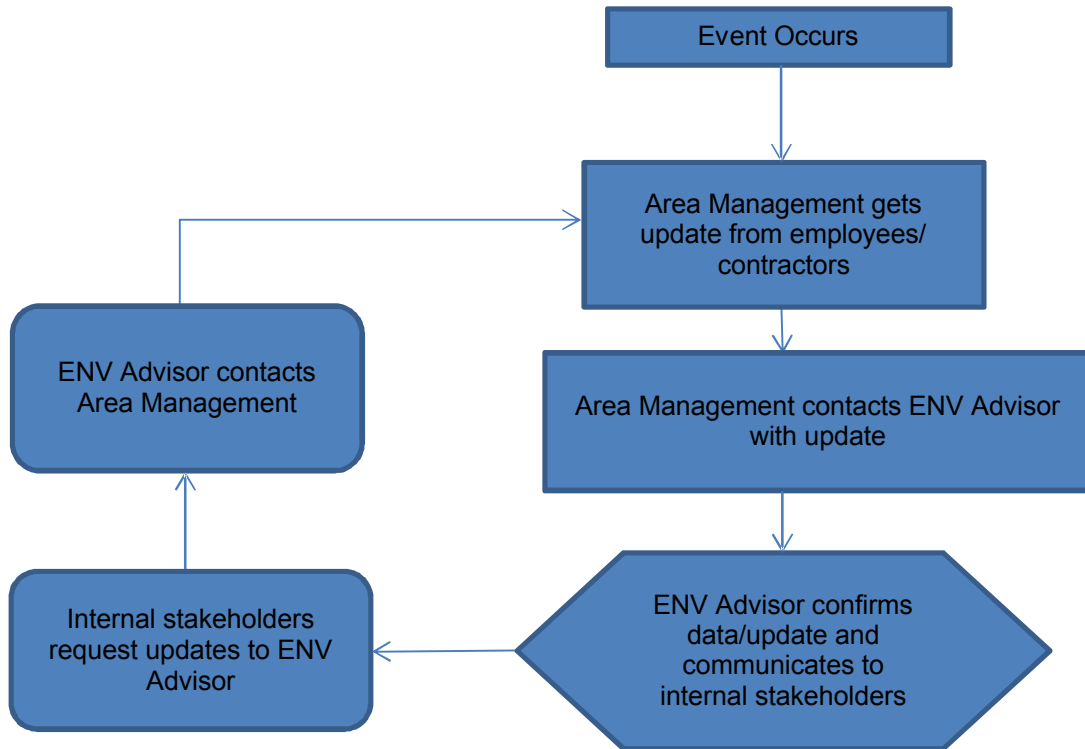


*Regardless, ALL RELEASES MUST BE REPORTED TO FORT HILLS ENVIRONMENTAL AFFAIRS

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Appendix D – Internal Communications Protocol during an event



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The following individuals have approved and signed this document

UserName: Sheri Lepoudre (slepoudre)

Title: Mgr Environment & Regulatory

Date: Tuesday, 06 February 2018, 03:16 PM Mountain Daylight Time

Meaning: I approve that this document is valid.

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