

EPAP Subcommittee minutes

1. Discussion on consolidating themes:

- Brad broke them down based on discussions from previous meeting.
- It was questioned when are we showing these to the AER – how should we pursue this matter? Justin said that Shelly from the AER is open to participate in our meetings when we are ready. He also said that to push the issues forward, we will also need to meet with CAPP for buy-in.
- Duane suggested everyone reviews the proposed themes in next two weeks and provide feedback in email to him
- Questions brought up in regards to providing clarity on the NCE's per theme.

2. Combining EPAP Committee with CAI Committee

- It was brought up at the last meeting that it might be a good idea to merge the committee teams together. Justin updated that he has not heard back from anyone at the CAI committee about the proposal. It was also mentioned that the CAI subcommittee was set up as a group that was driven by the Saskatchewan regulators, not by the EPAP.

3. Subtype Review

- Continued discussion from last meeting on the subtype review and the need for Heavy Oil in AB and for a 622-facility code.
- The AER is aware and this issue has been discussed before. New subtypes come out of energy, not from the regulators.
- Unsure if there has ever been a formal “ask” to get these set up. Pascal to do a write up.
- It was also questioned if it would be better to do in the D17 rewrite subcommittee.
- A 622 facility code can be done (per code/per company) with a written request to the AER.

4. Making Audits Biennial

- Lots of discussion on similar points to last time (that it can be done “unofficially”, you will get workflows if you do it, you can drop certain themes or subtypes – but it might be questioned)
- The biggest benefit for both industry and AER is time/resources. AER can better review audits, and industry can implement remediation plans. The draw back is that the regulators might question industry more.
- If implemented with the regulators, we would like that this be a default option, not a request made by the industry to the PAT.

- Debating a vote on the issue, but it was called off.
- Pascal and Duane to draft the request that we will use to explain to EPAP and AER what we would like.

5. Topic 2 from agenda

- Reviewed Maureen's wording. A few minor changes were requested.
- Duane to make changes and send to group for approval.

6. Topic 3 – Update OP Handbook

- Suggestion to AER would be to toss the current handbook and adopt the SK handbook

7. Topic 4 – Clarity

- There needs to be rules.
- There should be consistency among the PAT's, or they can provide formal direction.
- It is a risk based audit, we should be allowed to not audit low risk subtypes/facilities annually if there is only one. Is it acceptable not to review them? Could we establish a minimum?
- Comments – We need a better list of what is acceptable, or they should make it a drop down list with an option for free form comments. Can they create reason codes for not applicable facilities?

8. How to move forward

- Have the main topics drafted and get feedback from the small group.
- Duane and Justin to have a preliminary "off the record" meeting with Shelley/Wendy.