

IMG EPAP Subcommittee Meeting Minutes May 1/ 2019

1. Meeting minutes and Agenda *accepted*(next make a motion about accepting the minutes)
2. New member voted in
3.
 - Combine declaration(BC,AB<,SK) would be of value. Answer was no. Without an ask.
 - Subtype review no real discussion. Heavy oil would be of value work not completed AER request would be required.
 - Operator can review themes as deemed of value. Based upon their risk based EPAP.
 - Request companies commit to declaring every other year. (Maybe suggest a carrot and a whip. AER to introduce a fine if the operator of record does not declare by the second year.)
 - Combining CAI this is critical to eliminate false positive and move towards effective CAI report. Focus is next steps addressing the issues with Regulators.

4) Topic 1

Please review your list

The increase in the potential amount of ineffective controls or inadequate controls for the new theme 8 is quite large? I know it appears good but is there a better way to redistribute the number of compliance points.

Combine 7 into 8

Theme 9 absorbed into 8

Combine 12 and 13 combined in 12 and 8.

4) Topic 2

Great letter

Summary

Rejection of the Declarations should not occur. It is the summary of the findings and signed off by Senior Management. If there is need to address issues with a declaration, the AER should create a work flow so that the declaration maybe modified to achieve acceptance.

4) Topic 3

Request that the AER adopt the Sir Operator Handbook for EPAP as the AER handbook is outdated.

4) Topic 4

Every company's facility has an opportunity for EPAP evaluation of the controls every year. Each Company's process to selection facilities is unique to determine the facilities to review the ineffectiveness of controls.

Industry risk rating by the Producer determines the frequency of sub type section and therefore question why AER expects every sub type every year to be reviewed for the effectiveness of controls.

The AER may question the companies selection process? And may request the process. However, the request that sub types be audited at a frequency changes the selection process from a risk rating process to a subtype selection process.

4) Topic 5

Acquiring comments that are not rejected by AER for the declaration. Previous comments recommended by the AER one year are rejected the following.

Industry is no longer satisfied that declarations are rejected because 'Not Applicable' require a comment. These comments are "free form". Free form comments are rejected because of the wording used by companies does not fit within AER acceptable wording.

The industry seeks AER typical wording for reasons why a theme is not applicable. Industry suggestion to address this is a drop-down list in Petrinex. A drop list with a final "other" which is free form is comment is required. The comment will start with the wording "Reviewed facilities".

Attendees

Duane Kimball, Pascal Bonnet, Gary Fiselier, Osama K. Barahim, Justin Dolan, Brad Christensen, Mark Flynn, Linda Purden, and Berni Brunsch

