

AEC WEST LTD. / VERI-ILLUQ WINTER 2001/2002 BURNT LAKE 3D/2D and KAMIK 2D SEISMIC PROGRAM SPILL CONTINGENCY PLAN



February 8th, 2002

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PREAMBLE

This document contains information that is relevant to Veri-Illuq sites north of the 60th parallel, and specifically to the AEC West Limited Burnt Lake 3D/2D and Kamik 2D 2001/2002 Seismic Program. The programs are located at *Latitude* 69°08′ to 69°36′N and *Longitude* 133°47′ to 134°40′W and *Latitude* 68°55′ to 69°20′N and *Longitude* 133°20′ to 134°15′W, respectively. This Spill Contingency Plan is effective December 15th 2001 and expires December 31, 2002. The information in these plans and procedures can change from time to time, as it is a living document. The Plan is based on the policies and procedures of Veri-Illuq Geophysical Ltd. (Veri-Illuq) and AEC West Ltd.

A formal distribution has been made of this plan to AEC West and Veri-Illuq management personnel who are involved in this project, as well as all site supervisors on the prospect. In addition, it has been distributed to applicable governmental agencies where required or requested. While this information is not proprietary in nature, its contents apply only to the site indicated and no other sites should use this plan without a formal assessment of their needs and an accurate determination on how this information fits within that project.

This Spill Contingency Plan will be fully communicated to all employees and contractors on the site, and copies will be fully accessible to the crew members at the crew office, and from the Project HSE Advisor.

To receive additional copies of this plan, please contact the document custodian:
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INTRODUCTION

A key strategic Health Safety and Environment (HSE) objective of the operating group in the Mackenzie Delta is: No Accidents, No Harm to People, and No Damage to the Environment. A significant environmental aspect for seismic operations, identified by the operators is spills or leaks affecting soil and/or water. AEC West Ltd. and their contractors are committed to continually decreasing the number of regulatory reportable spills with the ultimate objective of zero spills. Our contractor, Veri-Illuq Geophysical Ltd. is committed to helping us achieve this objective.

The Spill Contingency Plan was developed for projects within the confines of the NWT, using the Veri-Illuq 2002 NWT/Yukon ERP, and contains specifics for the AEC West Winter 2001/2002 Burnt Lake 3D/2D and Kamik 2D Seismic Programs. Following the Northwest Territories Water Board, January, 1987 *Guidelines for Contingency Planning*, it includes identification of potential spill hazards, outlines spill response protocol and reporting, hazardous material information, and contact information.

The following document provides a brief overview of the Spill Plans that will be in place prior to the start-up of operations on the Burnt Lake and Kamik Seismic Programs. In addition, the Veri-Illuq Health Safety and Environment Manual will be available and may be referred to during an emergency.

1.0 RESPONSE ORGANISATION

The following chart outlines the proposed flow of communication in the event of a Spill:

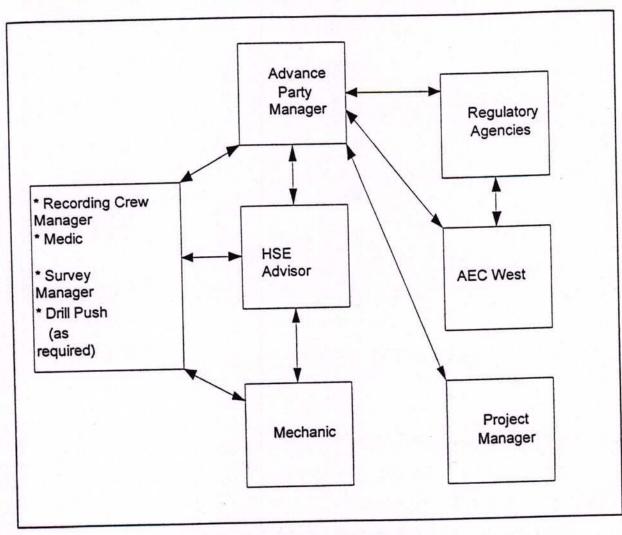


Figure 1 Spill Response – Lines of Communication

It should be noted that regardless of the involvement from all levels of personnel, the site supervisor is ultimately responsible for the actions of the workers when dealing with a spill. Notification of any spills must be made to him/her to ensure that they are in involved in any actions that have been taken, and will be taken.

2.0 INITIAL ACTION

2.1 Spill Response Primary Objectives

There are **four primary objectives** when dealing with an uncontrolled release of hazardous substances. They are, in order of importance and sequence of handling:

SAFETY OF PERSONNEL

RESCUE

SPILL CONTROL

ENVIRONMENTAL CONSERVATION

2.1.1 Safety of Personnel

The safety of the individuals involved in an incident is of utmost importance during emergency spill control. If any portion of the response procedure is dangerous to the safety or well being of the worker, the procedure will not be conducted. All employees/contractors of AEC West and Veri-Illuq Geophysical Ltd. have the *right to refuse* to take part in activities they feel are unsafe.

Specific safety hazards during the clean up of a spill may include:

- Explosion or fire from an ignition source contacting a Petroleum, Oils & Lubricants (POL) spill;
- Contamination of personnel or equipment with POL;
- > Absorption of material thru the skin;
- > Inhalation of vapours;
- Exposure of personnel to bio-hazardous material (sewage spill);
- > Ice weakening from degradation of the ice; and/or
- Total ice failure from an explosion or fire.

The site supervisor dealing with the spill will consider these potential hazards when determining if response procedures are appropriate. Training of personnel will include communication of the hazards identified, and training scenarios (mock drills) will include these specific safety hazards.

2.1.2 Rescue

Any personnel injured due to a spill will be removed from the area immediately, using appropriate First Aid techniques. Injured workers will receive medical assistance from the crew medic, and further care as deemed necessary or as requested.

2.1.3 Spill Control

Proper techniques in spill control will be taught to personnel on crews, and this information is to be disseminated to new workers as soon as possible after arriving on the crew. This information will be communicated by the crew HSE Advisor, or in his absence, by the site supervisor.

2.1.3.1 Spill Control Command Functions

There are 10 basic command functions that the spill response team will utilize to help them control and clean-up a hazardous substance release:

- 1) Establish a command position
- 2) Quickly ascertain the details of the incident
- 3) Establish communications with radios and telephones
- 4) Determine and establish a safety zone
- 5) Organize groups, and develop an attack plan
- 6) Utilize command from the Standard Operating Procedure framework
- 7) Study, assess, and rework the plan as necessary
- 8) Orchestrate the plan with the senior Veri-Illuq employee on site
- 9) Solicit and commission additional units as required
- 10) Return to first position and terminate attack / defence posture

After the spilled chemical has been identified, the following information is to be determined and documented from the Material Safety Data Sheet (MSDS):

- Physical and chemical characteristics
- 2) Physical hazards of the chemical
- 3) Health hazards, signs and symptoms of exposure
- 4) Routes of entry into the body and maximum exposure levels
- Reactivity hazards
- 6) Environmental concerns

As soon as possible, contact is to be made by Veri-Illuq with AEC West and with the NWT 24 hour Spill Report Line to ensure that all the necessary information and help is available to help manage a spill. In addition, the Veri-Illuq and AEC West's corporate Emergency Response Plans (ERP) will be activated to ensure that an accurate flow of information is being communicated to all necessary personnel.

2.1.4 Environmental Conservation

Efforts at spill control and clean-up are initially concentrated upon protection of workers, followed by environmental protection, and limiting the extent of impact to the area. The Veri-Illuq HSE Advisor assigned to the Burnt Lake 3D/2D and Kamik 2D seismic programs will have the contact numbers on site for appropriate agencies, so that they may obtain proper, knowledgeable clean-up and remediation assistance from various professionals.

3.1 Emergency Contacts

In addition to the response organisation outlined in Section 2.0, the following corporate officials are listed as individuals who may need to be contacted in the event of an incident that is not normally encountered. Additional numbers can be found on the site specific ERP.

If at any time there is a spill, the spill contact numbers provided below are to be immediately contacted, and the appropriate resources will be made available for site assistance as necessary.

EMERGENCY CONTACT NUMBERS

Regulatory Contact Information

NWT 24 Hour Spill Report Line	(867) 920-8130
National Energy Board John Korec (Environmental Assessment Officer)	(403) 292-6614 (office) (404) 370-6256 (cell) (403) 275-6256 (home)
Indian and Northern Affairs (Inuvik)	(867) 777-3361
Veri-Illuq Contact Information	
Richard Gerow (Arctic HSE Coordinator)	(403) 660-5134 (cell) (250) 701-7720 (cell) (250) 746-8935 (home)
Craig Massey (Veri-Illuq HSE Manager)	(403) 257-6753 (office) (403) 660-9948 (cell) (403) 948-2547 (home)
Pete Scott (Veri-Illuq Operations Manager)	(403) 257-5733 (office) (403) 650-1233 (cell) (403) 938-5527 (home)
Wayne Ross (Arctic Regional Manager)	(867) 777-3493 (office) (403) 861-7265 (cell) (867) 777-4471 (home)
Al Wong (Operations Supervisor)	(403) 257-6758 (office) (403) 605-7094 (cell) (403) 287-1146 (home)
Dennis Jordhoy (Media Contact)	(832) 351-8527 (office) (713) 818-3267 (cell) (281) 346-1797 (home)
AEC West Ltd. Contact Information	
John Duckett (Project Manager)	(403) 261-2569 (office)

Further information and contacts can be obtained from the site ERP, or the corporate ERP (posted in the crew office).

3.2 Spill Reporting Quantities

All spills or potential spills of petroleum products or other hazardous materials must be reported to the 24 Hour Spill Report Line and the National Energy Board, to ensure that an investigation may be undertaken, where deemed necessary, by the appropriate regulatory authority.

ALL SPILLS IN THE NWT ARE REPORTABLE, REGARDLESS OF VOLUME

3.3 Release Reporting

The spill reporting procedure is as follows:

- 1) Fill out "Spill Report" form as completely as possible prior to making the report
- 2) Report immediately to Yellowknife using the 24 Hour Spill Report Line

The release should be reported as soon as a person knows of a release, and at the first available opportunity, once all safety considerations have been handled.

Northwest Territories (Including Inuvik)

24 hour Spill Reporting (867) 920-8130

Individuals who may report a spill include:

- the site supervisor;
- the person who releases, causes, or permits the release of the substance;
- > the person having control of a substance that is released; and/or
- a police officer or employee of a local authority or other public authority who is informed of, or who investigates a release of a substance (unless they have reasonable grounds to believe that the spill has already been reported).

Government of the Northwest Territories SPILL REPORT

(Oil, Gas or Other Materials, i.e. Hazardous Chemicals, etc.)

Α	Report Date	Date and Time of Spill if Known				
В	Location and Map Coordinates (if known) and Direction if Moving					
С	Party Responsible					
D	Product Spilled and Estimated Quantities (Provide Metric Volumes/Weights if Possible)					
E	Cause of Spill					
F	Is Spill Terminated or Continuing					
G	Extent of Contaminated Area					
Н	Factors Affecting Spill or Recovery – Temperatures, Wind, Snow, Ice, Terrain, Buildings, etc.					
ı	Containment - Naturally, Booms, Dykes or Other. No Containment.					
J	Action, if any, Taken or Proposed to Contain, Recover, Clean-up or Dispose					
K	Do You Require Assist	ance If so, who	at Form			
L	Hazard to Persons or Property or Environment – Fire, Drinking Water, Threat to Fish or Wildlife					
Comments and/or Recommendations M						
Rep	orted by	Position, Employee, Location	Telephone			
Reported to		Position, Employee, Location	Telephone			

4.1 Emergency Spill Response

AEC West requires its key contractors to meet or exceed our HSE standards. To that end, the goals of Veri-Illuq include the protection of employees, the general public, and the environment from harm. Arctic ecosystems are very fragile, and in the event of an uncontrolled release we need to ensure that we limit the environmental damage to the least extent possible. Furthermore, the key to limiting damage is **prevention**. Prevention is enforced through jobsite inspections, frequent audits of crews and equipment, training, and general observations of areas that could be most affected by an uncontrolled release.

In all instances the following spill response will be enacted:

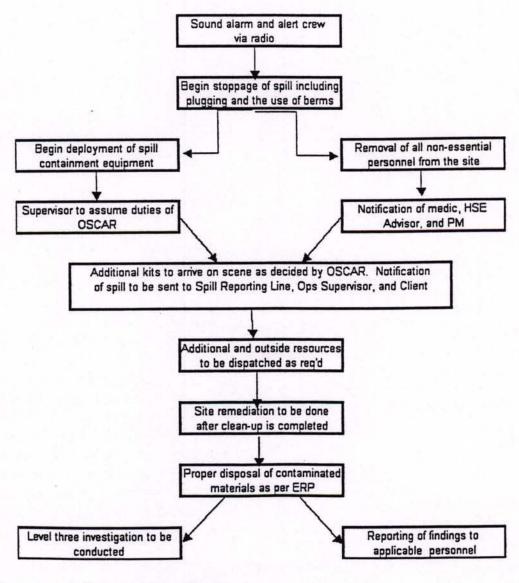


Figure 2

Spill Control Flow Sheet

4.1.1 Potential Spill Sources

There are a number of potential spill sources on a geophysical program. These sources are identified as:

- Camp systems: sources for contamination from a spill include the fuel sloops, generators, mechanical repair area, and individual equipment. Likely causes of a spill include improper fuelling practices, structural defects, improper containment of fluids being used, and transfer difficulties. There is also a potential for camp "grey water" spill during the storage and transfer of these fluids.
- ➤ Vehicles: vehicle refuelling has the highest potential for a small or chronic spill. A dedicated fuel handler on the AEC seismic program will limit this potential. However, spillage during re-fuelling and fuel tank breaches are still possible.
- Fuel Sloops/Trucks: Although this is mentioned as part of the camp systems, it is also an issue outside that compound where fuel is carried in larger quantities for refuelling of other equipment and vehicles during operations. For example, fuelling of drills will be an ongoing practice and there exists a potential for spill during this activity.

The majority of the above potential sources can have the risk reduced and mitigated by the implementation and use of the emergency response plan, appropriate fuel handling procedures, and by the training of specific crew individuals in spill response.

4.1.2 Spill Procedures on Land

Specific tasks for clean-up of a spill (when it is deemed safe to do so) are as follows:

- 1) Plug leaks from container with wooden plugs, absorbent pads etc. from the spill kit barrel
- 2) Shut off any controls necessary to stop the flow of product
- 3) Notify site personnel that an occurrence has taken place
- 4) Deploy other containment equipment such as berms as necessary
- 5) Shovelling of contaminated snow and overburden may be required. Contaminated materials will be placed in the barrels where the spill containment equipment was located. Additional containers will be obtained from the camp. These containers will then be sent to Inuvik for proper disposal of contents. The entire spill contents shall be collected including:
 - > All contaminated ice or soil
 - > All absorbent materials used in the clean-up process
 - > All absorbent pads used to soak up any POL
 - > Any contaminated snow
- 6) The HSE Advisor, the environmental monitor, and the site supervisor (party manager) shall be notified so that a level 2 investigation can be initiated. If additional resources are required, they shall be called at the discretion of the site supervisor.
- 7) The site should be left as clean of contamination as it was before the spill occurred.

- 8) Regulatory authorities will be notified upon completion of Spill Report Form
- 9) In the unlikely event of a water source contamination, immediate notification of appropriate government agencies shall be conducted. In the event that burning may be considered as a clean-up option, Indian and Northern Affairs Canada (Inuvik) will be notified for consultation (see emergency contact numbers).

The site of the spill will be a restricted zone and no ignition sources will be permitted within 100 metres of the site at any time. This includes smoking restrictions, running vehicles, and other potential ignition sources.

4.1.3 Spill Procedures in Water Courses

In the event of a vehicle going through the ice, or a spill of hydrocarbons into a waterbody (through a hole or crack in the ice), safety of the personnel on the site is the first consideration. At no time will the safety of the people on the site be compromised to ensure the spill is cleaned up. Once safety is assured, procedures are as follows:

- 1) The vacuum truck is to be immediately called to vacuum up any contamination that is on the surface of the water/ice. In the meantime, and while awaiting the truck, absorbent pads that are with all vehicles shall be put onto the surface of the water to absorb any POL.
- 2) If an ice crack is contaminated by hydrocarbons, it will be immediately drilled with a hand auger in order to determine the depth of contamination, and this is to be wiped clean with absorbent pads. In addition, any loose ice chips will be collected and disposed of in a proper manner. This may constitute disposal at a proper facility, or burning it in the local incinerator.
- 3) We will consider burning loose hydrocarbons as a clean-up option. Before this is conducted, Indian and Northern Affairs Canada will be contacted for their technical advice Burning has some special requirements and rules to ensure the safety of the personnel on site. These are:
 - > At the area of ignition, all non-essential personnel are to be removed to a distance no less than 250 metres from the site;
 - > The ice at the fire is to be considered stressed and will not be crossed until checked for adequate thickness;
 - The fire is to be lit with a long torch, which has a POL soaked rag attached and wrapped around it. After the fire is lit, all personnel will remain up-wind of produced smoke; and
 - Upon completion of the burn, the site will be further assessed for environmental damage, and a report issued regarding this issue.

Each spill site will have its own specific clean-up requirements and these requirements will be set upon consultation with all the appropriate contacts within regulatory bodies.

4.1.4 Waste Water (Grey Water)

Each camp will produce grey water, and there is a slight risk of spill or contamination of the ecosystem from this. If this occurs, it is to be handled in the same manner that we deal with spilling any other fluid (such as POL). Stoppage of the flow at the source, immediate containment, clean-up, and reporting functions shall remain the same. This is to ensure that the amount of damage to the area is kept to an absolute minimum, and that the proper personnel are notified at the jurisdictional and company level.

The location of all spills will be recorded and inspected for impact during the summer following operations.

4.2 Corporate Responsibility

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It is against the law to withhold information, or give wrong or misleading information to an environmental protection officer. These individuals are special constables, and they have enforcement powers that are designed to deter individuals who are unwilling to cooperate in an investigation. Therefore, the following will be a regulated practice at Veri-Illuq:

ASSISTANCE AND FULL COOPERATION WILL BE GIVEN TO ENVIRONMENTAL PROTECTION OFFICERS AT ALL TIMES DURING AN INVESTIGATION

5.0 ENVIRONMENTAL MAPPING

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Geophysical operations can affect the environment in a number of ways; and having knowledge of these issues helps reduce the impact by implementing appropriate mitigative techniques during operations. This includes applying all procedures and principles from both regulatory agencies as well as industry best practices.

Assessment of potential impacts on the environment will be done on a daily basis, and reporting of anything outside the set standards is to be included in reports to the Veri-Illuq and AEC West, including incident reporting within both companies.

An Environmental Map is attached that outlines the current proposed program, as well as **known** environmentally sensitive areas. Hazard maps are produced on a regular basis as hazards are identified on the program. Hazard maps are living documents and can change with weather, ice thickness and a number of other variables throughout project operations, and are reviewed with crew members as changes are made.

Environmental maps were produced and provided to the NWT Water Board and other regulatory agencies, in the Project Description for the proposed AEC Burnt Lake 3D/2D and Kamik 2D Seismic Programs, in August and November 2001, respectively. These maps identified the Regional location of the program, past seismic activity within the project vicinity (Cumulative Effects), Special Management Areas within or near the vicinity of the Project Area (based on Community Conservation Plans), and Archaeological and Cultural sites within the vicinity of the proposed project.

Environmental issues and mitigative measures employed during operations are routinely addressed with crew members at HSE - Operations Meetings and at weekly meetings of the Safety Committee onsite.

6.0 RESOURCE INVENTORY

6.1 Resources available on site

Spill barrels (kits) containing the necessary equipment required to confine and clean up a spill site are found in two locations at the main camp site. Each spill barrel is located near a fuel cache or re-fuelling station. The following materials are available on the site at all times in each kit:

- > Spill absorbent pads (aka diapers)
- Plugging devices for holes in containers
- > Containment barriers
- Barrel (to hold spilled material, contaminated snow, or overburden)
- Absorbent materials
- > A shovel
- > Protective wear

In addition, each personnel track vehicle will carry containment equipment that will include absorbent pads, a shovel, containment barriers, and protective wear. In the event that this equipment is deployed, it will be immediately replaced with a new kit to ensure that all the supplies are on hand at all times. This duty will lie with the Veri-Illuq HSE Advisor responsible for the crew.

Additionally, heavy equipment on the site will be used at the discretion of OSCAR (onsite commander) to ensure that the spill is contained to an area as small as possible. They will also be used to establish berms as a preventative measure.

Personnel trained in spill response and clean-up will be present on the program throughout operations.

6.2 External Resources

In the event of an emergency situation the local emergency agencies will be utilized as much as possible. This will include but not be limited to: air-medevac and utilization of government resources, i.e. Coast Guard search and rescue, etc.

Other operators in the Delta region may be called upon in the event of a large spill to provide transport, equipment, and where required, personnel. Spill equipment caches, once established, by the Mackenzie Delta Oil Spill Cooperative may also be used where required.

Contact numbers for deploying personnel and equipment are noted in Section 4.0.

7.1 Training of Personnel

Crew mechanics, HSE personnel, and site supervisors will have proper certification and competency regarding spill prevention, control, and clean-up. Training is conducted by PITS (Petroleum Industry Training Service) and provides the basics of understanding the control of these situations. In addition, formal training in spill control will be taught to crew personnel before they arrive on site to begin recording operations.

It should be noted that regardless of involvement from all levels of personnel, the site supervisor is ultimately responsible for the actions of the workers when dealing with a spill. The site supervisor will be notified of all spills to ensure that they are involved in the actions that have been taken, and will be taken.

In addition, all site mechanics have received training in spill control, and will be required to attend any spills within their site to ensure that the proper methods are being employed for control and clean-up. The mechanic will also assist in ensuring the safety of the personnel on the site during containment and clean-up operations.

Spill response is not limited to special training for certain individuals. It is the responsibility of all employees to understand the basic methods of prevention, control, clean-up, and reporting of spills. Anytime that there is a spill, there are potential hazards to both the environment and to our workers, particularly when the chemical involved is not stopped at the source, controlled at the flow, absorbed where able, and impact assessed prior to and after the fact.

7.2 Emergency Response Plan (ERP) Exercises

Training utilising mock ERP drills will be conducted throughout operations. Testing of the ERP will include environmental incidents (in particular, spills and spill containment) as well as personnel injuries. Mock drills are used to ensure that the crew personnel and supervisors are clear on their actions, in the unlikely event of a large spill.

At the discretion of the site supervisor, these drills should be conducted with each crew at least once per calendar month; more as necessary to improve skills or to provide training to current hazards as perceived by the project supervisors and HSE staff.

Drills will be properly and formally documented and sent to Veri-Illuq and AEC West management for their perusal, comments, and recommendations where made. Evaluation of the processes that are utilized are to be completed after each mock drill by the HSE staff, and discussions should be held with the site supervisors on how to improve the responses.

8.1 Hazardous Materials List

The following information list covers all hazardous materials that Veri-Illuq handles. Of those commodities the only ones of great volume are petroleum fuels and oils.

- ➤ Diesel fuel (fuel oil)
- ➤ Gasoline
- >Engine oil
- >Hydraulic fluids
- >Lubricating oils
- >Anti-freeze solutions
- >Solvents (engine degreasers)
- > Batteries
- > Explosives
- **>** Detonators

These materials are to be handled in a fashion consistent with company and legislative guidelines. At no time are these to be abandoned on the sites in any fashion.

The chemical formula or composition, physical and chemical properties and potential hazards of all hazardous materials are documented in Material Safety Data Sheets (MSDS) located onsite and available to all crew members. MSDS can be provided upon request.

8.1.1 Fuels and Oils Storage

In all instances fuel storage areas will have a spill containment system in use that will protect soil and ground water. Fuel storage facilities must be kept a minimum of 100 metres and downhill from any body of water wherever possible. Storage areas must be located on stable terrain or in natural depressions separated from water. Secondary containment systems such as berms, able to contain 110% of the volume of the largest fuel container stored within it, will be utilized on the AEC West program where 4000 litres or more fuel is stored. Secondary containment may also include double hulled containers for POL storage, but if these are utilized a spill pan must be in place under the fuelling operation in all cases.

Fuel containers will be inspected routinely for leaks; and deficiencies must be reported to the HSE Advisor for speedy corrective measures. Fuel trucks must have a valve located at the output of the tank and the fuelling hose to enable the operator to isolate a leak.

Waste fuels, oils, lubricants, hydraulic fluids, solvents and certain paints must be stored in their properly labelled containers.

8.1.2 Lubricating Oil Handling

Lubricating oil must be recycled in accordance with local and company regulations and practices. At no time will POL come in contact with the ice or overburden.

8.1.3 Refueling Practices

Refuelling operations must be conducted while ensuring there is no spillage. Avoid refuelling near streams or lakebeds wherever possible. Drip pans or absorbent materials will be placed under leaking or unsealed connections, or where overflow potential exists, until corrective action is taken. Vehicles or tanks should not be filled to maximum capacity; leaving room for expansion or vehicle movement.

The fuel handler must never leave the refuelling operation while it is progress. Secondary catchment systems (ie. drip pans) will be used during re-fuelling.

8.2 Hazardous Waste Disposal

Anytime that we have hazardous or recyclable wastes they have to be sent to the proper facility for either disposal or recycling as the situation dictates. In either case, the shipper must receive the **two** documents that are generated during this process. The first one is from the company that is transporting the product from our site. This document will show the name of the shipper, the type and quantity of the chemical, and the date of pick-up. The second document is from the receiver, which is the end recipient of the product. This document will show that the chemical was sent from you via the carrier, and that they have received it as stated.

Occasionally the carrier and the receiver of the product are one and the same. This does not release our responsibility to having to receive both documents. Again, we must show that the product has either been recycled or disposed of in a proper manner. Documents must be kept on file for two years, as required under the Transportation of Dangerous Goods Act.

It will be the responsibility of the site supervisor or his appointee (i.e. the mechanic) to determine where and how hazardous wastes may be legally and properly disposed of in each area worked. Questions should be directed to the HSE Advisor or site supervisor for clarification.

Note: It is not sufficient for Veri-Illuq or our appointee to deliver our waste to a collection point and assume that they will handle our waste correctly. It is our obligation to determine whether those who accept our waste are handling this material in an environmentally correct manner.

Each crew, office and shop will submit an Environmental Disposal Form to the HSE Manager along with other monthly reporting. The report should reflect only the final disposition of a product as far as Veri-Illuq is concerned.

Incidents concerning an emergency involving Dangerous Goods release or injury must be reported to the Director General Dangerous Goods in Ottawa on a Schedule IX Form 2 report within 30 days of the occurrence.