

## ERCB Field Operations Group and Emergency Planning and Assessment Section Voluntary Self-Disclosure Process—Frequently Asked Questions

These frequently asked questions are only in regard to the voluntary self-disclosure process when submitting to the ERCB Field Operations Group (formally known as the Field Surveillance Group) and the Emergency Planning and Assessment (EPA) Section. Other ERCB groups (such as Facilities Applications) may have a different process for self-disclosures.

- 1) Where is the ERCB Voluntary Self-Disclosure Form located?

The form is available on the ERCB Web site [www.ercb.ca](http://www.ercb.ca) under Industry Zone : Rules, Regulations Requirements : ERCB Forms and from the appropriate ERCB group (see question 8).

- 2) How is a voluntary self-disclosure submitted to the ERCB group?

*Directive 019: ERCB Compliance Assurance—Enforcement* does not prescribe a method of submission; however, the Voluntary Self-Disclosure Form has been developed to support the process for Field Operations and EPA. For ease of use, the form has ERCB group e-mail addresses available in a drop-down box.

- 3) How does a licensee know if a noncompliance is Low or High Risk?

This information is located in the various ERCB directives and on the list of ERCB Risk Assessed Noncompliances located on the ERCB Web site under Industry Zone : Compliance and Enforcement : Risk Assessed Noncompliance.

- 4) How does a licensee know whether the self-disclosure has been accepted?

After receipt of a self-disclosure form, the ERCB group will indicate in the ERCB Use Only section whether the self-disclosure has been accepted and will then return the form back to the licensee.

- 5) What if a self-disclosure is submitted and a response from the ERCB group is not received?

Contact the appropriate ERCB group.

- 6) What will occur if there are errors on the Voluntary Self-Disclosure Form such as typos or incorrect information?

There are no penalties against the licensee for submitting a Voluntary Self-Disclosure Form with errors; the form is for administration purposes only. The ERCB reviews all the information submitted in the form and may identify errors, if present. The ERCB will work with the licensee to correct any errors in a timely manner. If these errors result in the ERCB reassessing whether the submission qualifies as a voluntary self-disclosure, the licensee will be contacted.

Notwithstanding the above, all licensees are encouraged to supply accurate information to the ERCB to facilitate and streamline the voluntary self-disclosure process.

- 7) What process should the licensee follow to request an extension to the **Deadline Date** for an accepted self-disclosure?

Contact the ERCB group with the extension request before the established deadline date. The ERCB group will review the request, accept or not accept it, and notify the licensee of the decision, including the reason for acceptance or non-acceptance.

- 8) Can a “provincial” self-disclosure be submitted?

Yes, self-disclosures that impact more than one Field Centre can either be separated by the licensee and submitted to the appropriate Field Centres or submitted provincially by selecting [FSOB-BST-Inbox@ercb.ca](mailto:FSOB-BST-Inbox@ercb.ca) in the **E-mail to** drop-down box on the Voluntary Self-Disclosure Form.

- 9) Where can a map that depicts the Field Centre boundaries be found?

A Field Centre boundary map is located on the ERCB Web site under About the ERCB : Contact Information : ERCB Field Centres : [View Map showing Field Centre Boundaries](#).

- 10) Can a self-disclosure be submitted for a well, pipeline, or facility with no licence?

Yes, self-disclosures of this nature may be submitted to [Facilities.Applications@ercb.ca](mailto:Facilities.Applications@ercb.ca), which deals with issues related to licensing. See *Directive 056: Energy Development Applications and Schedules* for more details.

- 11) Is there a contact if help is needed with the Voluntary Self-Disclosure Form?

Yes, the appropriate ERCB group can be contacted via e-mail or telephone (refer to questions 2 and 8 for more details).

- 12) What will occur if there is a public complaint related to a noncompliance and the ERCB is notified solely through a voluntary self-disclosure form that has not been reviewed or accepted by the ERCB at the time of the complaint (e.g., off-lease hydrogen sulphide odours at an oil facility)?

Enforcement actions will not be taken by the ERCB provided that the licensee is the first party to contact the ERCB, immediately corrects or addresses the noncompliance, and develops and implements an action plan within the time specified by the ERCB group.

Note that it is in the best interest of all stakeholders that the licensee immediately and verbally reports instances of this nature so that an appropriate and timely assessment of the licensee’s actions can be conducted by the ERCB. The purpose of the Voluntary Self-Disclosure Form is primarily administrative and not for first contact.

- 13) A corporate amalgamation has taken place and the new licensee wishes to self-disclose that 200 identification signs require changes. Does the licensee have to enter each location on the Voluntary Self-Disclosure Form when submitting a provincial self-disclosure of this magnitude?

Larger-scale provincial self-disclosures can be considered “blanket” provincial self-disclosures. In such situations, unless High Risk noncompliances are being self-disclosed, the licensee does not need to fill in the Location field in the Voluntary Self-Disclosure Form, but is encouraged to do so, if possible. For High Risk provincial self-disclosures, however, ERCB staff will require the licensee to complete all the fields in the form. The licensee can determine if its voluntary self-disclosure falls under the latter category by contacting Field Surveillance and Operations Branch, Business Support, at [FSOB-BST-Inbox@ercb.ca](mailto:FSOB-BST-Inbox@ercb.ca) prior to submitting the form.