

## ACTION PLAN FOR AER DECISION 2013-014

### DOVER OPERATING CORPORATION

#### APPLICATION FOR A BITUMEN RECOVERY SCHEME, ATHABASCA OS

ACTION ITEM	REQUIRED ACTION/COMMENTS	DECISION: 2013-014	AER PROCESS TO ENSURE FOLLOW-UP	STATUS & EVIDENCE
1 Emissions	Plant-wide fugitive emissions will be identified and controlled using the protocol recommended by the Environmental Code of Practice for the Measurement and Control of Fugitive Emissions from Equipment Leaks (Canadian Council of Ministers of the Environment, 1993).	Section: Paragraph 131 P. 20	Dover will develop and submit an emissions protocol implementation plan to the AER by December 31, 2014.	Pending - Dover Operating Corporation changed its name to Brion Energy effective May 31, 2013.  Brion Energy deferred the project until 2017.
2 Emissions	A leak detection and repair system will be implemented.	Section: Paragraph 131 P. 20	Dover will provide a leak detection and repair program report to the AER once the program has been implemented.	Pending -
3 Emissions	A program will be developed and implemented to detect and repair leaks, and that program must meet or exceed the CAPP Best Management Practice for Fugitive Emissions Management.	Section: Paragraph 131 P. 20	Dover will provide a leak detection and repair program report to the AER once the program has been implemented.	Pending -
4 Emissions	A low oxides of nitrogen emissions technology will be selected as required by the Alberta Interim Emission Guidelines for Oxides of Nitrogen for New Boilers, Heaters and Turbines using Gaseous Fuels for the Oil Sands Region (Alberta Environment, 2007).	Section: Paragraph 131 P. 20	Dover will send a confirmation letter and an as-built schematic to the AER once the requirement has been met.	Pending -
5 Emissions	Vapour-recovery Unit (VRU) will be used to reduce hydrocarbon emissions.	Section: Paragraph 131 P. 20	Dover will send a confirmation letter to the AER once the requirement has been met.	Pending -
6 Emissions	There will be no continuous flaring other than of pilot and purge gas.	Section: Paragraph 131 P. 20	Dover will include an annual flaring event report as part of the annual performance presentation to the AER.	Pending -
7 Emissions	Odour indicator species will be continuously monitored.	Section: Paragraph 131 P. 20	Dover will include an odour indicator species update as part of the annual performance presentation to the AER.	Pending -

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8 Emissions	A protocol must developed for responding to odours, including investigating the source of the odour, notifying communities near the Project, addressing the odour source, and monitoring to verify that the source of the odour has been addressed.	Section: Paragraph 131 P. 20	Dover will send a copy of the protocol to the AER.	Pending -
9 Emissions	Dover must provide a plan to mitigate SO2 emissions and meet AER Interim Directive 2001-03 on a project-wide basis. The plan must be submitted to the AER for review.	Section: Paragraph 129 P. 20	Dover will submit SO2 emissions mitigation plan to the AER on July 1st, 2018.	Pending -
10 Lighting	The scheme approval must include directional and motion-sensitive lighting at the plant sites, well pads, and associated facilities.	Section: Paragraph 137 P. 21	Dover will send a confirmation letter to the AER once the requirement has been met.	Pending -

*The conditions imposed in approvals/licence(s) are monitored by the Alberta Energy Regulator (AER). The AER has developed a process whereby an action plan is developed internally to ensure that AER staff monitor conditions arising from decision reports for compliance. The conditions are managed in an action plan that is updated quarterly with statuses of conditions. The action plan defines the action required, timeframes for completion, and a summary of the evidence provided to confirm a condition was met. For more information, please contact the Action Plan Administrator at (403) 297-4289.*