



INFORMATIONAL LETTER IL 94-22

14 November 1994

TO: All Oil, Gas, Pipeline, and Oil Sands Operators

OPERATING GUIDELINES FOR INDUSTRIAL ACTIVITY IN CARIBOU RANGE - NORTH-WEST ALBERTA

Woodland caribou are designated an "endangered species" in Alberta. In an attempt to coordinate industrial development on caribou range, operating guidelines have been prepared by representatives of the upstream petroleum industry, forest industry, and government for specific regions of caribou range. General guidelines currently exist for Northwest Alberta, as well as range-specific guidelines for the Slave Lake, Red Earth, and Pedigree areas of North-west Alberta. General guidelines for North-west Alberta have recently been developed in recognition of significant caribou range not previously covered by guidelines. A copy of the [operating guidelines](#) for North-west Alberta is attached to this Informational Letter.

These guidelines introduce the requirements for development of caribou protection plans when operating in caribou range within North-west Alberta. These operating guidelines are superseded by the Red Earth and Slave Lake range-specific protection plans, but take precedent over the outdated Pedigree protection plan. They also apply to other areas in North-west Alberta not previously covered by operating guidelines. The guidelines for North-east Alberta remain in effect.

Caribou protection plans are to be submitted to Alberta Environmental Protection (AEP) for approval prior to granting of surface dispositions. It is anticipated that significant flexibility on the part of both the operator and AEP will be required to ensure that the plans are able to effectively meet the two goals of allowing energy development while adequately protecting woodland caribou.

Administration and approval of the protection plans are the responsibility of AEP and questions should be addressed to the appropriate ranger district office in the Peace River Region, Land Forest Services, Alberta Environmental Protection. For wildlife information during the pre- planning phase, please contact:

Alberta Environmental Protection
Fish and Wildlife Services
P.O. Bag 900-26
Peace River, AB TOH 2X0
Telephone: 624-6405

The ERCB will serve as a referral agency for AEP on technical matters related to drilling, production, transportation, and processing operations on an as-needed basis.

signed by

B. F. Bietz, Ph.D., P.Biol.
Board Member

Enclosure

94/09/14

Operating Guidelines For Industrial Activity in Caribou Ranges In Northwest Alberta

Introduction:

Woodland caribou are classified as an endangered species pursuant to the Alberta Wildlife Act. As part of the caribou protection and maintenance effort, management plans are being prepared to facilitate industrial development on caribou range and provide that the integrity and supply of habitat is maintained to permit its use by caribou. This report is the industrial management plan for the caribou ranges shown in Figure 1. It provides a long term management philosophy which may be applied in range specific plans. This philosophy mitigates long term production impacts as opposed to the short term impact of exploration and development. Some of these ranges currently have range-specific management plans which address individual industry sectors (Red Earth and Slave Lake). These plans will supersede the more general Northwest Plan. The Pedigree Plan is outdated. The Northwest Guidelines will apply to the Pedigree area. Each management plan will be implemented with flexibility and common sense.

Principles

The following principles apply to the Northwest caribou ranges:

1. Industrial activity can occur on caribou range provided that the integrity and supply of habitat is maintained to permit its use by caribou.
2. A Caribou Protection Plan will be prepared by each company operating in a caribou range. These plans will be incorporated into Annual Operating Plans produced by timber companies and as independent plans developed by oil and gas companies. Items listed in the Caribou Protection Plan Section of this document should be addressed in these plans. Innovative techniques or procedures will be shared amongst the operators at the end of each season.
3. Government and industry will take a flexible but conservative approach to project planning and caribou protection.
4. The effectiveness of this plan and the range specific plans will be assessed and the plans modified as required.
5. This plan and the range specific plans will be modified as required to incorporate new information derived from the ongoing research work.
6. Industry will begin work in caribou range as early as possible in the winter and take necessary steps to complete their winter's work as early as possible.

Management Strategy

Industrial activity could affect caribou in four ways:

- increased public access to the range
- increased predation pressure
- additional sensory disturbance
- habitat alteration

It is assumed that public access, predation and habitat alteration are primary concerns and sensory disturbance is a secondary concern. Habitat supply will be dealt with in separate planning exercises.

The Northwestern caribou ranges include a major muskeg component, and are therefore primarily a frozen ground development situation. As such, many of the impacts of the exploration/ development phase are difficult to mitigate. There is a greater opportunity to mitigate the longer term impacts associated with the production phase. To achieve caribou management objectives the combined impacts of oil and gas operating and development activities must be at a level which do not significantly affect caribou. A strategy proposed to achieve this is:

1. Public access management is required for operational and exploration/development phases within the caribou range. Public support is necessary for access management when traditional access routes are involved.
2. The caribou ranges are divided into two areas, those with existing activity and those without. Each area will be managed differently.
 - a. **Existing Activity Area**

All areas within 1 mile of an existing all weather road and all operations that are currently producing oil and gas using frozen access on a seasonal basis are included. Operations may continue to operate as they have in the past. The Existing Activity Area is shown in Figure 1.
 2. **New Activity Area**

All areas within caribou ranges which are not Existing Activity Areas. Exploration and development activity will occur on frozen ground. Production facilities will be operated remotely. Remote operations in this context means operations which occur primarily without surface access. Aerial support and telemetry are currently being used to achieve this objective. Other innovative methods may be developed which also meet this objective. It is recognized that some facilities will require annual, frozen- ground surface access in early winter for servicing and transport of supplies and materials.

Remote operations will not always be technically feasible. In this circumstance, the Caribou Protection Plan will explain why remote operations are not feasible, provide a description of proposed operations including access and indicate how the impacts on caribou will be mitigated. Mitigation strategies may include, but not be limited to, roll back, access management, timing restrictions, allowing snow build up on roads and innovation. The technical expertise of the ERCB will be used to assess the infeasibility of remote operation of the proposed facility.

Measures can be taken to facilitate emergency access as long as they are consistent with

the intent of this plan.

The Existing Area/New Area designation will be considered along with habitat quality by the timber industry in sequencing their work. Generally harvesting in the New Activity Areas will be scheduled first. Timber haul in New Activity Areas will be on frozen ground access.

3. Caribou Protection Plan

A Caribou Protection Plan will be prepared by each company for its work program in caribou ranges. A copy of the approved plan will be submitted with each oil and gas disposition in caribou range. This plan will be incorporated into the disposition approval and serve as the wildlife mitigation for the disposition. Each of the points in the Template (Section 3b) must be addressed in the Protection Plan.

3a Process

- a range specific Caribou Protection Plan will be developed by each company for each years operation.
- for the 1994/95 winter Caribou Protection Plans should be submitted as soon as possible. In future years, these plans should be submitted by the early fall. Late submissions will be considered in exceptional circumstances.
- companies unfamiliar with operating in caribou ranges are encouraged to seek preliminary information from Environmental Protection and Northwest Standing Committee members before developing the Protection Plan.
- the Caribou Protection Plans will be submitted to the applicable Ranger District Office. It is recommended that plans for major developments be presented at a meeting with Lands and Forest Service and Fish and Wildlife staff as has occurred in the past.
- these plans will be reviewed and a decision conveyed to the Company within 5 working days unless ERCB review is required.
- disputes and disagreements will normally be addressed through discussion and consultation as in the past. In situations where resolution of differences is not achieved, the Company may use the appeal process.
- each company will advise the Northwest Standing Committee of innovative technologies and strategies at the end of each operating season. The Northwest Standing Committee will disseminate this information to all members.

3b Template

Timing/sequencing

The objective of the timing/sequencing section is to achieve the early in/early out philosophy.

- sequence operations to complete work in more critical caribou habitats first ie. scarce habitat types
- use additional equipment and crews to compress the work time to get-out early.
- commence operations as soon as frost conditions exist
- plan the winter's work early
- an activity schedule should be provided

Access Development

The objective of this section is to minimize the quantity and quality of access

- use Low Impact Seismic
- use existing access
- use shared/common access
- all access for the exploration/development phase will be temporary winter access
- production operations will be primarily conducted without surface access.
- during the production phase necessary servicing and transport of materials and equipment will be done in early winter using temporary winter access

Public Access Management

- An effective form of public access control must be maintained on all new developments within the caribou range at all times that access routes are open. Current access controls will also be maintained. Gates, manned access control, temporary rollback or blockage-during non-active periods, etc. may be considered.

4. Emergency situations

This plan has been prepared to address normal industrial activities. If major problems develop, such as a well blow out or pipeline break or serious human injury, necessary steps will be taken to address the problem. If an extremely severe winter occurs, government and industry will consult to determine what, if any, modifications will be necessary to address the situation.

FIGURE 1: Map - Caribou Ranges in NW Alberta

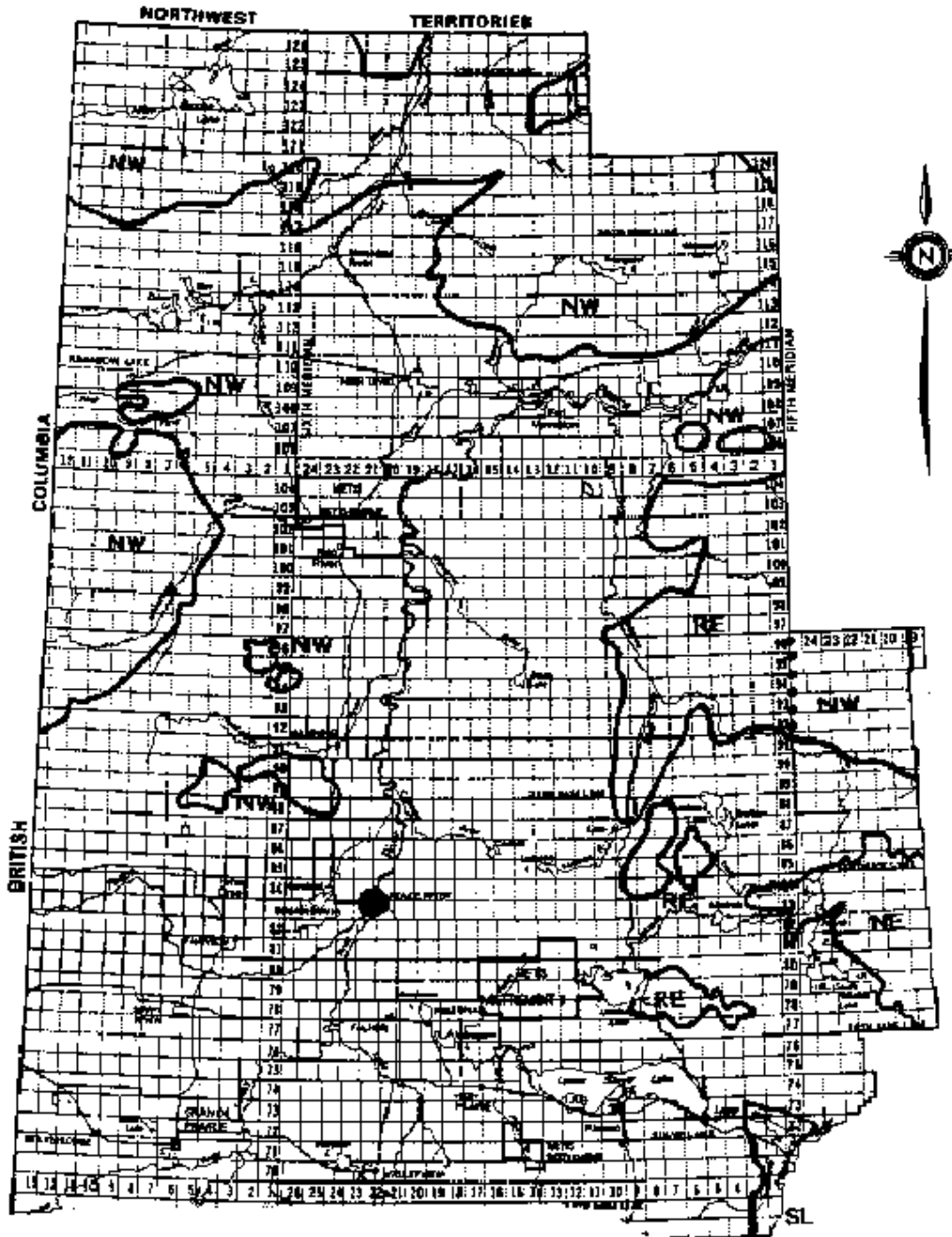


Figure 1: Caribou Ranges in NW Alberta

- NW** Caribou Range - NW Plan Guidelines
- RE** Caribou Range - Red Earth Plan Guidelines
- SL** Caribou Range - Slave Lake Plan Guidelines
- NE** Caribou Range - NE Guidelines

For more detailed maps (1:500,000), contact Land and Forest Services Offices in Slave Lake, Peace River or High Level. 1:50,000 scale maps are available in District Ranger Offices.