



Western Canadian Spill Services Ltd.

Spill Preparedness and Response Support since 1972

## OIL SPILL COOPERATIVE EXERCISES NON-ATTENDANCE MEMBER COMPANY FEEDBACK

### Exercise Attendance Requirements

Under current spill preparedness requirements outlined in provincial directives; licensees of wells and pipelines must attend the annual Oil Spill Cooperative exercise in each of the Coop areas where they have licensed wells (except wells suspended in accordance with AER requirements and gas wells that produce < 2m<sup>3</sup> hydrocarbon liquids per month) and /or licensed pipelines transporting liquid hydrocarbon.

### Exercise Attendance Exemptions

The following exemptions are available to licensees that are unable to attend an exercise in the area where they have licensed wells and/or pipelines:

- The licensee can attend an exercise in an area outside of the area where they have licensed wells and/or pipelines provided the Cooperative Administrator of each Coop is notified in advance for tracking purposes.
- The licensee can complete a spill response course, self -study spill responder course or incident commander for oil spill course from a recognized training institution; this option cannot be used in consecutive years by the licensee; if this option is taken the area Cooperative Administrator must be notified for tracking purposes.

### WCSS' Role – Coop Exercises

WCSS holds a minimum of one oil spill training exercise in each of its 9 Cooperatives on an annual basis; although every effort is made to notify licensees of the date, location and exercise outline it is the licensee's responsibility to identify the exercise schedule in their respective Coop areas. The exercise dates are outlined on the WCSS website [www.wcss.ab.ca](http://www.wcss.ab.ca), in our year end newsletter and distributed by CAPP. Members can also contact the Area Administrator to receive exercise notifications.

WCSS is responsible for tracking exercise attendance and providing the exercise reports and tracking information to the provincial regulators. WCSS does not have a role in the enforcement of requirements outlined in directives.

### Notification to Members Linked to Non-attendance and Reporting to Regulators

WCSS distributes a note to licensees that are not in attendance at exercises that advises that they missed the exercise and an outline of exemption criteria that could be used to satisfy requirements.

WCSS will provide a feed-back form to licensees that are unable to attend their area exercise; if WCSS believes that the licensee has reasonable grounds for not attending based on a review of the completed form we will recommend to the regulator that the non-attende licensee should not be considered to be out of compliance. The regulators have advised that they are in agreement with this approach. **The member company feedback form is on the 2nd page of this document.**

**OIL SPILL COOPERATIVE EXERCISES  
NON-ATTENDANCE FEEDBACKFORM**

Member Company \_\_\_\_\_  
Oil Spill Cooperative \_\_\_\_\_  
Company Contact email/phone \_\_\_\_\_

1. Historical analysis – Member company track record linked to exercise attendance; although WCSS maintains this information, please provide any comments that you may have:
2. Circumstantial – Why didn't the member company have a representative attend the area exercise?
3. Coop Involvement – Does your company have volunteers that are involved in Cooperative Committees and/or other involvement?
4. Spill Experience – What spill training does your area representative(s) have and what types of spill response experience does he/she have?
5. In-house Response Capability – Does your company have an adequate internal spill response capability to manage a spill in surface water (i.e. provincial response team, access to subject matter experts, other) that covers the Cooperative?
6. What can WCSS do to make it easier for members to be in compliance with the exercise attendance requirement?

Complete on-line or by hand, scan and email to [Amy.Grenier@wcss.ab.ca](mailto:Amy.Grenier@wcss.ab.ca)

Note: Question 5 – WCSS has developed an oil spill preparedness self-assessment form that can be used to assess your internal response capability; a second form is available to assess a company's oil spill response contractors – see [wcss.ab.ca](http://wcss.ab.ca) – forms

---