

# Pembina Infrastructure and Logistics LP Pembina Corunna Terminal

April 20, 2016



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# **Executive Summary**

On April 20<sup>th</sup> 2016, a "What If" process hazard analysis was performed by a multidisciplinary team of employees of Pembina Pipelines Infrastructure and Logistics LP. to assess all the potential hazards involved in the entire life cycle of the Cavern 45 Re-drill project. This assessment was completed as it is both a Pembina Pipelines internal requirement and a requirement as outlined in CSA Z341.2-14 (Section 7.1).

Cavern 45 is an underground salt storage cavern originally mined by Dow Chemicals. It is presently out of service. The proposed project is to drill two new well bores into this cavern and utilize the cavern for the storage of propane.

The assessment focused on 3 major aspects of the re-drill project; Geological issues, Drilling and Workover Activities (including abandonment) and Operations. Each of these sections involve their own unique set of hazards to consider. The Geological Issues section discusses geological risks as per section 7.3 of CSA Z341.2-14 as well as risks involving Neighbouring Activities as per section 7.2 of CSA Z341.2-14.

Over the course of the hazard assessment session 112 potential hazards were identified, analyzed and risk ranked using the Pembina Risk Matrix. Any hazards that were deemed unacceptable were assigned and action to reduce the risk to an acceptable level.

By the end of the session the group was comfortable that the risks had received the appropriate level of consideration and were properly mitigated.

# Introduction

Cavern 45 is a salt storage cavern that is owned by Pembina Pipelines Infrastructure and Logistics LP. Pembina is in the planning stages of a project to drill two new entries into this cavern (and abandon the existing entry) to bring this cavern back into service as a propane storage cavern.

As part of Pembina's internal standards as well as the standards set out by CSA Z341.2-14 (Section 7.1) a risk assessment is required to be performed prior to any work starting in order to properly analyze the hazards involved in this project. A "What If" risk assessment was chosen as the risk assessment tool for its abilities to assess a wide range of hazards consistently.

On April 20, 2016 the "What If" Assessment was completed by a diverse team of subject matter experts. Hazards were identified, risk ranked using the Pembina Corporate Risk Assessment Matrix, and discussed.

The results of the "What If" can be found in the "What If" Assessment section of this document.



# "What If" Team Profile

Team Member	Job Title	Attendance
Pat Mahoney	Operations Foreman	Full
Scott Morris, C.E.T.	Cavern Specialist	Full
Mike Mousseau	Instrumentation Technician	Full
Chad Severs, P.Eng.	Project Engineer	Full
lan Shaw	Operations Day Lead	Full
Alex Strachan P.Eng. (Facilitator)	Plant Engineer	Full
Steve Vandenheuvel	Maintenance Foreman	Full



# **Facility Information**

# **Facility History**

The Pembina Corunna Terminal is Located on Highway 40 in St Clair Township, Ontario, Canada, east of the town of Corunna, Ontario. The property extends on both sides of the highway between Lasalle Line and Petrolia Line/Hill Street. The extent of the property is shown in Figure 1.

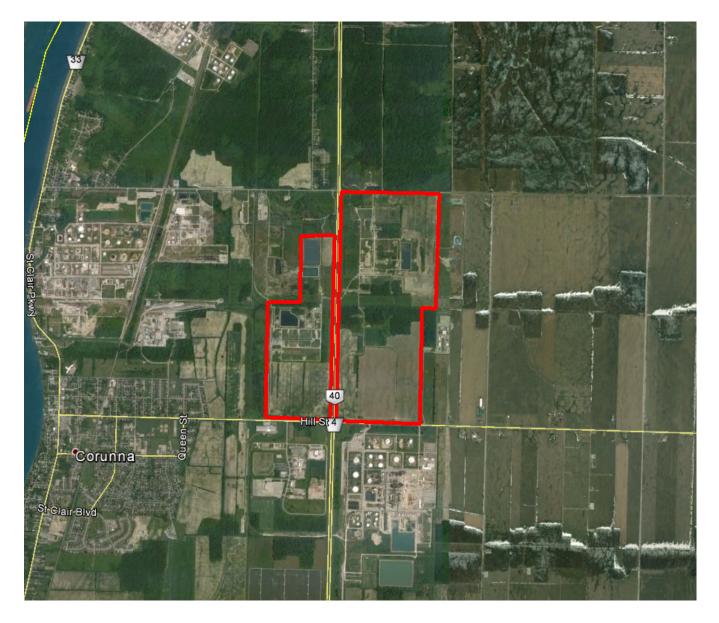


Figure 1: Overview of Pembina Corunna Terminal Boundaries



What is currently known as the Pembina Corunna Terminal was originally owned by Dow Chemicals Canada ULC. Dow operated a salt solution mining operation. This operation resulted in the mining of more than 20 Salt Caverns. Dow then used some of the Salt caverns for storage of various hydrocarbons and chemicals used by their processing plant in Sarnia, Ontario. Salt mining operations were suspended in 1993. Provident Energy purchased the facility from Dow in 2010 and converted the facility into a natural gas liquids storage site. Pembina Pipelines acquired Provident In 2012 and has since expanded the NGL storage operation.

# **Current Operations Description**

Pembina Pipelines Infrastructure and Logistics LP. is the owner and operator of the Pembina Corunna Terminal. The Facility is a 24 hour manned plant for the import, export and underground storage of natural gas liquids. Currently, Pembina maintains and operates 9 storage caverns. Three of these caverns are currently in ethane service, three in propane service, two in refinery grade butane service and one in iso-butane service.

Natural Gas Liquids are imported into the Corunna terminal via a number of pipelines as well as a 16 spot rail rack. The imported product is injected into the underground caverns.

The Corunna Terminal has 5 brine ponds in operation to hold brine that is displaced when product is put into a storage cavern. To extract product, brine is pumped into the caverns to displace the hydrocarbon liquid.

The hydrocarbon liquid is then dried using either a Molecular Sieve Dehydration unit (ethane) or Calcium Chloride Dryers (propane and butane) before being exported via pipeline, rail or in the case of propane, a 2 spot truck loading rack.



# Cavern 45

Cavern 45 was one of many wells solution mined by Dow Chemicals Canada ULC. It is located on the East side of the Pembina Corunna Terminal (see Figure 2).



Figure 2: Location of Cavern 45



Cavern 45 is currently a single entry cavern. Dow utilized this cavern for storage of diesel fuel to assist with the solution mining of other caverns in the area. The diesel was removed and the cavern has been inactive since the early 1990s.

Based on the most recent Sonar Report completed in 2007 by Sonarwire, Cavern 45 has a capacity of 267,275 cubic meters. The cavern begins at a depth of 601 m below surface and extends to 646 m below surface.

The proposed project is to drill two new entries into the cavern. After completion of the two new well bores, the existing well will be abandoned.

# "What If" Analysis Background

# "What If" Methodology

What If analysis is a creative, brainstorming methodology for examining a process, operation, or facility. This qualitative technique identifies design faults, potential hazards, and operating problems – depending on the team's experience – by asking "What if ..." questions for hazards. Examples of such a question might be;

- What if a leak occurs?
- What if the feed material is directed to the wrong storage tank?
- What if a fire occurs?
- What if the product is changed for low vapour product to a high vapour product?

The What If team then assesses each question or scenario, one at a time, for the consequences of the postulated or hypothetical event and, depending on what

safeguards are present or planned for installation, decides upon recommendations for preventing or mitigating such an occurrence if it were to occur.

Projects, systems, sub-systems, study areas or nodes are noted on the relevant documents, diagrams and drawings, such as process flow sheets and diagrams (PFD) or P&IDs, and are reviewed by the PHA Team composed of a diverse group of subject matter experts (SME). Credible worst case consequences are summarized in a few words to be used in the What If review as possible scenarios.

Steps in a "What If":

- 1. Divide the facility or unit into systems and subsystems, i.e. study areas, that perform common functions, much like the approach taken for Guide Word HAZOP for the designation of color highlighted nodes.
- Postulate potential problems or possible failures by asking questions, such as "What if ...?" or "Is it possible for ... to occur?" or "Has ... been considered?"
- 3. For each question asked in step 2, record and identity the expected consequences in the absence of safeguards.
- 4. For each question asked in step 2, also record all safeguards present, or planned that may prevent the occurrence of the hazard or mitigate the consequences in the unlikely event of occurrence.
- 5. For each consequences identified within step 3, estimate the likelihood of the event actually occurring with all safeguards in place and functioning normally as per the corporate PHA Risk Assessment Matrix.
- 6. For each of the risks identified in step 5, propose any recommendations or actions required, on a nonprescriptive basis, to prevent the occurrence of the hazard or



mitigate the consequences should it occur within the boundaries of ALARP (as low as reasonably practicable).

# **Risk Assessment Matrix**

A Risk Assessment Matrix (RAM) is a two dimensional matrix that is used during a risk assessment to define the various levels of risk as the function, or combination, of the severity of a credible worst case consequence, in the absence of safeguards, and the likelihood of the consequence occurring with safeguards in place.

The RAM is simplified tool showing a two dimensional arrangement of many different cells linking likelihood of the consequence occurring, across the horizontal axis with the perceived severity of the linked consequence depicted on the vertical access. Each cell within the matrix is a combination of consequence severity and likelihood of occurrence of the consequence. Each cell is also coded with a colour depicting the relative risk level. A two dimensional matrix is used to increase the visibility of risks and assist in management decision making by showing different relative risk levels for operational and residual risks with new or improved safeguarding.

Please note however that some problems can occur with the use of a risk matrix in a qualitative review as a team can assign identical ratings to quantitatively very different risks due to "range compression" within an order of magnitude; likewise the team can also assume that on a 5 x 5 matrix that a consequence of 5 and likelihood of 3 is the same relative risk as a consequence of 3 and a likelihood of 5, which is not the case. Use of risk matrices can also result in a team mistakenly assigning higher qualitative ratings to quantitatively smaller risks. Issues like these are often overcome with matrix calibration,



the use of a diverse group of subject matter experts and the comparison with known past events similar to the ones under review.

How to use a risk assessment matrix:

Tables for both consequence and likelihood are meant to aid in the qualitative approach for determining and assigning the relative scores for both consequence severity and likelihood on an order of magnitude (OoM) basis by the PHA team composed of a diverse group of subject matter experts with at least one experienced and knowledgeable worker (operator) present.

Risk is estimated for each cause – consequence scenario under review as the combination of the credible worst case consequence, in the absence of safeguards, and the likelihood of the final outcome of the initiating event going forward to the final outcome of concern.

Final outcome takes into account all planned or existing safeguards being in place and acting normally.

Once the risk has been estimated by the team, with agreement in the results by the worker representative, it is mapped onto the PHA Risk Assessment Matrix.



# Pembina Risk Assessment Matrix

	>\$200M	$\left \right $	5	м	м	н	VH	VH
pplicable)	\$20M to \$200M		4	L	м	н	н	VH
Financial Ruler (Where Applicable)	\$2M to \$20M	Severity	з	L	м	м	н	н
Financial	\$200,000 to \$2M		2	L	L	м	м	м
	<\$200,000		1	L	L	L	L	м
				1	2	3 Likelihood	4	5

### RESIDUAL RISK RANKING

Residual Risk	Description
Very High	<ul> <li>Immediate action for risk reduction is required.</li> <li>Confirmation of credible consequence and appropriate likelihood.</li> <li>Additional safeguards required after confirmation of high scores for both consequence and likelihood.</li> <li>LOPA recommended if consequence deemed credible worst case.</li> </ul>
High	<ul> <li>Action for risk reduction is required as soon as reasonably practicable.</li> <li>Confirmation of credible consequence and appropriate likelihood.</li> <li>An additional safeguard may be required after confirmation of consequence and likelihood.</li> <li>LOPA recommended if consequence deemed credible worst case.</li> </ul>
Medium	<ul> <li>Action for risk reduction will be considered with cost/scheduling factors.</li> <li>No mitigation required where controls can be verified as functional.</li> <li>ALARP (as Low as Reasonably Practicable).</li> </ul>
Low	<ul> <li>Mitigation measures may be justified.</li> <li>Acceptable level of risk if a management plan is in place.</li> </ul>

Figure 3: Pembina Risk Assessment Matrix



The following tables show the qualitative assessment guidelines for both severity and likelihood that comprise the risk estimation calculation.

Severity Score	Descriptor	Health & Safety	Environmental and Regulatory	Financial	Operational	Reputation
5	Catastrophic/ Extreme Catastrophic/ Extreme Catastrophic/ Extreme		Major long term widespread environmental incident;	Equipment damage or production costs greater than \$200,000,000.	Major production outage with lengthy response time & extensive damage.	Sustained major negative press coverage or analyst reports; or national coverage for sustaine periods; or stakeholders begin to lose faith and some withdraw support.
4	Major	Single loss of life and/or some long- term health implications as a result of the company's actions .	Long term environmental damage; or offsite release with significant pollution/contamination; or possibility of revocation of regulatory licence.	Equipment damage or production costs between \$20,000,000 & \$200,000,000.	to the limit and requires significant	Long-term negative media focus and/or sustained concerns raised by more than one key stakeholder; or prolonged area attention/difficult to resolve.
3	Moderate	Lost time injury and/or significant health effects.	Onsite release outside designed containment; or impact extends beyond property line and noticeable odours and/or visible emissions migrating beyond property boundary resulting in potential complaint from neighbouring property ; or significant cleanup efforts required; or a non- compliance incident resulting in enforcement.	Equipment damage or production costs between \$2,000,000 & \$20,000,000.	A significant event which can be managed through existing processes; or a major failure, quickly controlled with minor damage.	Medium-term negative media focus or short term credibility concern, quickly resolved; or brief area attention.
2	Minor	Reportable incident and/or minor injuries.	Dosite release within designed containment; or minor cleanup efforts required; or incident reportable to regulator.	Equipment damage or production costs between \$200,000 & \$2,000,000.	Impact of event requires actions that can be managed through existing processes; or a minor failure, quickly controlled, loss.	Short-term negative media focus; or negative analyst reports/press and employees disgruntled; or isolated incidents/resolvable.
1	Insignificant	Non-reportable incident; or incident with no injuries.	Controlled or minor non- reportable release.	Equipment damage or production costs less than \$200,000.	Impact of event can be absorbed through normal activity; or minor incident.	Minimal impact on public; or no media attention.

### Likelihood

Likelihood Score	Descriptor	Description	Frequency
5	Almost Certain	Frequent repeat occurrences in unit.	f≥1/yr
4	Likely	Common occurrence in unit.	1/yr < f≥1/10 γr
3	Possible	Occasional occurrence in company.	$1/10\gamma r < f \ge 1/100\gamma r$
2	Unlikely	Remote occurrence in company. Occasional occurrence in industry.	1/100 yr < f≥ 1/1000 yr
1	Rare	Remote occurrence in industry.	$1/1000 \text{ yr} < f \ge 1/10,000 \text{ yr}$



# "What If" Assessment

# **Systems and Subsystems**

The Cavern 45 Project was broken into 3 Systems to analyze, and each system was broken into subsystems. The systems, sub systems and their descriptions are listed below:

- Reservoir Considerations
  - Geological Issues Any hazards related to the geology of the cavern and formations encountered while drilling into cavern
  - Neighbouring Activities Any Hazards related to other subsurface operations such as nearby caverns and wells interacting with Cavern 45
- Drilling/Workover Activities
  - Site Preparation Any hazards related to work required prior to drilling of wells (site surveying, Rig movement, etc.)
  - Drilling Operations Any hazards related to Drilling of the proposed wellbores
  - Development Workovers Any hazards related to workover operations such as logging, Mechanical Integrity testing, casing repair work, etc.
  - Abandonment Any hazards related to abandoning this cavern
- Operations
  - Downhole Operations Any hazards related to the well bores or cavern during operation. See Yellow Node on P&IDs
  - Brine System Operations Any hazards related to the brine system piping and equipment required to operate this well and the existing system it will interface with. See Blue Node on P&IDs



 Hydrocarbon System Operations – Any Hazard related to the hydrocarbon piping and equipment required to operate this cavern and the existing system it will interface with. See Green Node on P&IDs



# "What If" Worksheet

### System: 1. Reservoir Considerations

Subsystem: 1. Geological Issues

What If	Causes	Consequences	CA T	Operating Risk, Before Additional Risk Reduction			Safeguards	What If Recommendations	Rec at	idual Afte comm ions Risk educt	iend for	Remarks
				S	L	RR			Sev erity	liho	Risk Ran king	Remark
Study of Available Geophysical Data	<ol> <li>Lack of geophysical data could result in sub optimal drilling</li> </ol>	<ol> <li>Potential for whipstock or other additional drilling expenses</li> </ol>	F	3	1	Low	1. Geomechanical report Completed by Respec					1. As Per CSA Z341.2-14 7.3.1 (a)
							2. Sonar Surveys					7.5.1 (a)
							<ol> <li>Existing wellbore into cavern</li> </ol>					
							4. Land Surveys					
Regional Tectonic Activity, regional and Local Fault Zones and structural anomalies	<ol> <li>If wellbore or formation is in area of high tectonic activity, wellbore could shift</li> </ol>	1. Loss of production Containment, Environmental Release	E	4	1	Low	<ol> <li>No history of major tectonic activity</li> </ol>					1. As Per CSA Z341.2-14 7.3.1 (b)
		2. Potential Personnel Hazards	H& S	4	1	Low	<ol> <li>Geomechanical report Completed by Respec</li> </ol>					
		3. Financial Loss	F	3	1	Low						
Delineation of Subsurface Perimeter of Storage zone	<ol> <li>Size and shape of cavern determines storage volume and mechanical storage properties</li> </ol>	1. No Hazardous Consequences		1	1	Low						1. As Per CSA Z341.2-14 7.3.1 (c)
												2. Sonar Surveys give very detailed limit of storage cavern
Formation Study from surface to 100 m below storage zone	<ol> <li>Water zones or gas zones present</li> </ol>	<ol> <li>See Drilling operations for risks associated with flowing water and gas zones</li> </ol>		1	1	Low						1. As Per CSA Z341.2-14 7.3.1 (d)



### System: 1. Reservoir Considerations

### Subsystem: 1. Geological Issues

What If	Causes	Consequences	CA T	Ri: A	sk, dd R	rating Before itional tisk uction	Safeguards	What If Recommendations	Rec at	idual - Afte comm ions Risk educt	nend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Formations and Structures within 1 km subsurface radius	1. See Neighbouring operations	<ol> <li>See Neighbouring operations</li> </ol>		1	1	Low						1. As Per CSA Z341.2-14 7.3.1 (e)
Identification and Characterization of any potentially associated permeability zones and their impact	<ol> <li>See Neighbouring operations</li> </ol>	<ol> <li>See Neighbouring operations</li> </ol>		1	1	Low						1. As Per CSA Z341.2-14 7.3.1 (f)
A study of regional stresses and strains	1. Regional Stresses could cause damage to cavern	<ol> <li>Loss of availability of cavern, financial impact</li> </ol>	H& S	3	1	Low	<ol> <li>Geomechanical report Completed by Respec</li> <li>Long standing history of cavern and other caverns in area</li> </ol>					1. As Per CSA Z341.2-14 7.3.1 (g)
Study of the mechanical and chemical properties of the salt and confining rock formations	containment of cavern, potentially	1. Loss of production Containment, Environmental Release	E	4	1	Low	1. Geomechanical report Completed by Respec					1. As Per CSA Z341.2-14 7.3.1 (h)
	to surface	2. Potential Personnel Hazards	H& S	4	1	Low	<ol> <li>Long standing history of cavern and other caverns in area</li> </ol>					
A study of structural anomalies including faulting	<ol> <li>Existing Cavern, No faulting present</li> </ol>	<ol> <li>Financial Loss</li> <li>Poor salt or confining rock could result in loss of containment</li> </ol>	F	3	1	Low Low	3. Sonar Surveys					1. As Per CSA
		of cavern	_									Z341.2-14 7.3.1 (i)
A study of regional dynamics of the formation including cavern closure, subsidence, salt behavior and	<ol> <li>Poor salt closure, or undue interference from neighbouring activities could result in loss of containment of</li> </ol>	Containment, Environmental Release	E		1	Low	1. Geomechanical report Completed by Respec					1. As Per CSA Z341.2-14 7.3.1 (j)
		<ol> <li>Potential Personnel Hazards</li> </ol>	H& S	4	1	Low	<ol> <li>Long standing history of cavern and</li> </ol>					



### System: 1. Reservoir Considerations

### Subsystem: 1. Geological Issues

What If	Causes	Consequences	CA T	Ri A	Operating Risk, Before Additional Risk Reduction		Safeguards	What If Recommendations	Residual Risk - After Recommend ations for Risk Reduction			Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
interference from neighbouring activities	cavern, potentially to surface						other caverns in area					
		3. Financial Loss	F	3	1	Low	3. Sonar Surveys					



### System: 1. Reservoir Considerations

### Subsystem: 2. Neighbouring Activities

What If	Causes	Consequences	CA T	Ri A	Operating Risk, Before Additional Risk Reduction		Safeguards	What If Recommendations	Rec at	idual - Afte comm ions Risk educt	nend for	Remarks
				s	L	RR	1		Sev erity	liho	Risk Ran king	Remark
There were fracture treatments within 1 km	<ol> <li>Fracture treatments were completed on Dow caverns</li> </ol>	<ol> <li>Since Cavern 45 is an existing cavern with a history of usage there is no fracture concerns with this cavern</li> </ol>		1	1	Low	<ol> <li>Fractures occurred in A2, Cavern 45 within the B Salt</li> <li>Mechanical Integrity Testing Program, as per Ontario operating standard</li> </ol>					<ol> <li>Without current inventory issues, no current concerns on caverns with fracture treatment s</li> <li>1. As Per CSA Z341.2-14</li> </ol>
There are Active Production Wells within 1 km	1. No active Production Wells < 1 km	1. No Hazardous Consequences		1	1	Low	and per CSA Z341					7.2 (a) 1. 1. As Per CSA Z341.2-14 7.2 (a)
There are Observation Wells within 1 km	1. There are several observation wells in the area	1. Observation wells are there to ensure no communication between Pembina Salt Caverns and Enbridge Dow Moore Reef, No Hazardous Consequences		1	1	Low						1. 1. As Per CSA Z341.2-14 7.2 (c)
Active Storage Caverns/Wells within 1 km	1. There are 26 Active Storage caverns/wells within 1 km. Small potential for communication between caverns.	<ol> <li>Cavern communication could lead to product contamination. Financial Impact.</li> </ol>	F	3	1	Low	<ol> <li>Sonar Surveys</li> <li>No Inventory issues in caverns</li> <li>Mechanical Integrity Testing Program, as per Ontario operating standard and per CSA Z341</li> </ol>					1. 1. As Per CSA Z341.2-14 7.2 (a)



### System: 1. Reservoir Considerations

### Subsystem: 2. Neighbouring Activities

What If	Causes	Causes Consequences	CA T	Ri A CA R		erating , Before litional Risk luction	Safeguards	What If Recommendations	Rec at	Afte	for	Remarks
				s	L	RR	-		Sev erity	liho	Risk Ran king	Remark
Abandoned Storage Caverns/Wells within 1 km	<ol> <li>There are 32 Abandoned Storage caverns/wells within 1 km. Small potential for communication between caverns.</li> </ol>	<ol> <li>Cavern communication could lead to product contamination. Financial Impact.</li> </ol>	F	3	1	Low	<ol> <li>Sonar Surveys</li> <li>No Inventory issues in caverns</li> <li>Mechanical Integrity Testing Program, as per Ontario operating standard and per CSA Z341</li> </ol>					1. 1. As Per CSA Z341.2-14 7.2 (a)
There are Wells within 1 km of target that have no completion/abandonm ent records	<ol> <li>All wells within 1 km all have detailed records</li> </ol>	1. No Hazardous Consequences		1	1	Low						1. As Per CSA Z341.2-14 7.2 (a)
Active or abandoned conventional subsurface mining operations within a 20 km radius of the storage	1. There are 89 Solution mining wells within the 20 km. Small potential for loss of product to solution wells.	<ol> <li>Loss of hydrocarbon, Financial Impact</li> </ol>	F	3	1	Low	1. Sonar Surveys					1. 1. As Per CSA Z341.2-14 7.2 (b)
facility		<ol> <li>Hydrocarbon into brine solution well, potential incident resulting in injury or fatality</li> </ol>	H& S	5	1	Medium	<ol> <li>No Inventory issues in caverns</li> <li>Mechanical Integrity Testing Program, as per Ontario operating standard and per CSA Z341</li> <li>Solution Mining Regulations and Practices to prevent unintentional growth of solution well beyond predetermined size.</li> </ol>					2. Existing safeguard s adequate



### System: 2. Drilling/Workover Activities

Subsystem: 1. Site Preparation

What If	Causes	s Consequences	CA T			Before itional lisk	Safeguards	What If Recommendations	Rec at	idual - Afte comm ions f Risk educti	iend for	Remarks
				S	L	RR			Sev erity	liho	Risk Ran king	Remark
General Work Activity Safety Considerations	document our general safety	1.					<ol> <li>Safe Work Permits</li> <li>Non Routine Task</li> </ol>					
	practices to prevent incidents						Analysis					
							<ol> <li>Toolbox Safety Meetings</li> </ol>					
							<ol> <li>Monthly general Safety Meetings</li> </ol>					
							5. Job Procedures					
							6. Positive Safety Recognitions					
							7. Audits, Assessments, Observations					
							8. Site Orientation					
Public Access to well site surroundings	<ol> <li>Well is located within Pembina Fenced Boundaries, card access required</li> </ol>	1. No Hazardous Consequences		1	1	Low						
Another Well in area hit by vehicle	1. Slippery Conditions causing vehicle to lose control and strike wellhead	<ol> <li>Shearing of wellhead, Loss of containment, Environmental impact</li> </ol>	E	4	1	Low	1. Driver Training program					1. Existing safeguard s adequate
		2. Shearing of wellhead, Potential Personnel Hazards	H& S	4	1	Low	2. Wellhead robustness					
		<ol> <li>Shearing of wellhead, Financial Loss, operational impact</li> </ol>	F	3	1	Low	<ol> <li>Posted Speed limits</li> </ol>					



		<ol> <li>Minor Damage to wellhead, environmental release</li> </ol>	E	2	1	Low	4. Well area chained off, visible barrier		
		<ol> <li>Vapour Cloud in well 45 area, potential for hazard to multiple</li> </ol>	H& S	5	1	Medium	5. Safe Work Permits		
		parties on site					<ol> <li>Spotting during high risk vehicle movement</li> </ol>		
							7. Gas testing		
Piping in area hit by vehicle	1. Slippery Conditions causing vehicle to lose control and strike piping	1. Failure of piping, Loss of containment, Environmental impact	E	4	1	Low	1. Driver Training program		1. Existing safeguard s adequate
		<ol> <li>Failure of piping, Potential Personnel Hazards</li> </ol>	H& S	4	1	Low	2. Posted Speed limits		
		<ol> <li>Failure of piping, Financial Loss, operational impact</li> </ol>	F	3	1	Low	<ol> <li>Piping area chained off, visible barrier</li> </ol>		
		<ol> <li>Vapour Cloud in well 45 area, potential for</li> </ol>	H& S	5	1	Medium	4. Safe Work Permits		
		hazard to multiple parties on site					5. Spotting during high risk vehicle movement		
							6. Gas testing		
Farmers tile impacted by rig traffic	1. All traffic on Pre- existing roads, no tile impacted	1. No Hazardous Consequences		1	1	Low			
Landowner Implications	1. Pembina owns land	1. No Hazardous Consequences		1	1	Low			
Workover on nearby well	1. Not applicable	1. No Hazardous Consequences		1	1	Low			1. Any work in area would utilize shared services and hence not be complete d simultane ously
Vehicles impact 600 V power lines	1. Slippery Conditions causing vehicle to lose control and strike power pole	1. Potential Personnel injury	H& S	4	1	Low	1. Driver Training program         2. Safe Work Permits		

							<ol> <li>Spotting during high risk vehicle movement</li> </ol>					
	<ol> <li>Rig height could catch powerlines in the area</li> </ol>	1. Potential Personnel injury	H& S	4	2	Medium	program	<ol> <li>Perform Rig Move assessment, consider height, width, weight over underground</li> </ol>	4	1	Lo w	
							2. Safe Work Permits	facilities. If height of powerlines is a				
							<ol> <li>Spotting during high risk vehicle movement</li> </ol>	concern, reroute lines before rig move				
Digging Equipment Strikes Underground Pipe	1. Underground pipes in general area	1. Pipe Loss of containment, environmental release	E	3	2	Medium	1. One Call					1. Existing safeguard s adequate
		2. Potential hazards to personnel	H& S	4	2	Medium	2. Ground Disturbance Procedure					
							3. Well Placement with offset from underground piping					



### System: 2. Drilling/Workover Activities

What If	Causes	Consequences	CA T	Ri A	isk, Add R	rating Before itional isk uction	Safeguards	What If Recommendations	Rec at	dual Afte comm ions Risk educt	iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Major Site Incident Occurs during drilling operations (unrelated to drilling)	1. Plant Upset / Evacuation, Propane truck loading upset	<ol> <li>Rig must suspend operation until incident is rectified</li> </ol>	F	1	4	Low						
Rig Impacts Well during Move	1. See wellhead hit in Site Preparation	1. See Site Preparation		1	1	Low						
Rig impacts pipe during move	1. See piping hit in Site Preparation	1. See Site Preparation		1	1	Low						
	<ol> <li>Pipe damage, loss of containment, potential hazards to personnel</li> </ol>	H& S	4	1	Low	<ol> <li>All rig traffic on existing roads</li> </ol>	<ol> <li>Perform Rig Move assessment, consider height, width, weight over underground facilities. If height of</li> </ol>					
		2. Pipe damage, loss of containment, potential environmental release	E	4	1	Low		powerlines is a concern, reroute lines before rig move				
		<ol> <li>1. Pipe damage, loss of containment, financial loss</li> </ol>	F	3	1	Low						
Surface gas is hit	1. Surface Gas present	<ol> <li>Potential for gas kick, potential injury</li> </ol>	H& S	2	1	Low	<ol> <li>Formations all known and potential gas zones will be prepared for</li> </ol>					
		2. Potential for gas kick, financial loss	F	3	1	Low	2. Fluid Density Program					
							3. Blow out Preventer (BOP)					
Flowing water is hit	<ol> <li>Detroit river has potential for flowing water</li> </ol>	1. No Hazardous Consequences		1	1	Low						1. Has not been an issue in past drills in area



### System: 2. Drilling/Workover Activities

What If	Causes	Consequences	CA T	Ri A	sk, Idd F	erating , Before litional Risk luction	Safeguards	What If Recommendations	Rec at	dual Afte omm ions Risk educt	nend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Traffic in the area	<ol> <li>Heavier traffic within facility, increased risk for collision</li> </ol>	<ol> <li>Vehicle Collision, potential for personnel injury</li> </ol>	H& S	4	1	Low	1. Speed Limits within plant					
							2. Driver Training programs					
							3. Safe Work Permits					
							<ol> <li>Spotting during high risk vehicle movement</li> </ol>					
Cement does not go to surface	<ol> <li>Poor cementing job, loss of circulation</li> </ol>	<ol> <li>Failure to meet code, remediation required</li> </ol>	F	2	3	Medium	1. Cementing program					1. Existing safeguard
							2. Centralizer Program					s adequate
Casing Buckled or thread damaged	1. Improper torqueing technique, damage during shipping or assembly	1. Financial impact	F	2	2	Low	1. Casing Thread technician					
Surface Casing not set in solid part of formation	1. Wrong drill depth	1. Failure to meet code, remediation required	F	2	1	Low						
Surface gas present while welding on casing bowl	<ol> <li>Surface gas leaks to surface during welding</li> </ol>	<ol> <li>Potential fire/explosion, hazard to personnel</li> </ol>	H& S	4	1	Low	1. Personal Gas Detection					
							2. Safe Work Permits/Welding Procedure					
Installing/dismantling BOP	1. BOP impacts wellhead during	1. Damage to Casing Bowl, Financial Loss	F	1	2	Low	1. Lifting Program					
	install						2. Job Task Analysis					
	2. BOP install impacts person	1. Personal Injury	H& S	3	2	Medium	1. Lifting Program					1. Existing safeguard
							2. Job Task Analysis					s adequate



### System: 2. Drilling/Workover Activities

What If	Causes	Consequences	CA T	Ri A	isk Ada I	erating , Before ditional Risk duction	Safeguards	What If Recommendations	Rec ati	Afte	nend for	Remarks
				s	L	RR	-		Sev erity	liho	Risk Ran king	Remark
Loss of Circulation	1. Thief zone	1. Financial impact	F	1	4	Low	1. Fluid Density Program					
Stuck in Hole	1. Pressure Differential, bore hole collapse, poor circulation	1. Financial impact	F	2	4	Medium	<ol> <li>Drilling Program</li> <li>Fluid Density Program</li> </ol>					1. Existing safeguard s adequate
Formation hydrocarbons hit in upper formation	1. Hydrocarbons present	<ol> <li>Potential for hydrocarbons to enter the drilling fluid tank, potential injury</li> </ol>	H& S	4	1	Low	<ol> <li>Formations all known and high risk zones will be prepared for</li> </ol>					
		<ol> <li>Potential for hydrocarbons to enter the drilling fluid tank, financial loss</li> </ol>	F	3	1	Low	<ol> <li>Rig gas monitoring</li> <li>Personal Gas Detection</li> </ol>					
Defective Casing cementing resulting in micro annulus	1. Poor Cement Job	<ol> <li>Hydrocarbon leak to surface, environmental release</li> </ol>	E	2	2	Low	<ol> <li>Blow out Preventer (BOP)</li> <li>Wellhead and casing annulus valves</li> </ol>					
Tools Lost in Hole	1. Tools have tendency to get stuck	<ol> <li>Fishing Operation, potential of loss of wellbore, financial loss</li> </ol>	F	3	2	Medium	1. Tool running Procedures 2. Fishing tools					1. Existing safeguard s adequate
Accumulator Fails (Loss of remote BOP operation)	1. Mechanical Failure	1. Lose the ability to remotely close BOP, potential release of hydrocarbon if occurs during gas kick event	H& S	4	1	Low	<ol> <li>Triple Redundancy</li> <li>Manual Override on BOP</li> </ol>	-				
BOP Fails	1. Mechanical Failure	1. Lose the ability to close BOP, potential release of hydrocarbon if	H& S	4	1	Low	<ol> <li>Manual Override on BOP</li> <li>Two sets of rams</li> </ol>					



### System: 2. Drilling/Workover Activities

What If	Causes	Consequences	CA T	Ri: A	sk, Idd F	erating , Before litional Risk luction	Safeguards	What If Recommendations	Rec at	idual - Afte comm ions f Risk educt	r iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
		occurs during gas kick event					<ol> <li>Fluid Density Program</li> </ol>					
Cavern Roof Collapse	1. Drilling into existing cavern could cause damage to roof	1. Potential Loss of cavern	F	3	1	Low	1. Cavern Entry Plan					
NORMs present from drilling activities	1. No known NORMS in drilling area, no credible cause	1. No Hazardous Consequences		1	1	Low						
Improper/incomplete scaffolding used	1. Personnel use incomplete scaffold	<ol> <li>Scaffold Collapse, potential injury</li> </ol>	H& S	4	2		<ol> <li>All scaffolding to be tagged prior to use</li> <li>Fall arrest used for</li> </ol>					1. Existing safeguard s
							heights > 6 ft.					adequate
Leaks in temporary piping	1. improper assembly	1. Environmental Impact	E	1	4	Low	1. Leak check on Temporary Piping					
Vehicle close to wellhead creates	1. Site movement	1. Potential fire/explosion, hazard	H& S	4	2	Medium	1. Vehicle Use Policy					<ol> <li>Existing safeguard</li> </ol>
ignition source		to personnel					2. Coordination of activities					s adequate
							3. Safe Work Permits					
							4. Gas testing					
							5. Hazard Assessment					
							6. PASO on diesel engines required					



### System: 2. Drilling/Workover Activities

### Subsystem: 3. Development Workovers

What If	Causes	Consequences	CA T	Ri A	sk, dd F	erating Before itional Risk uction	Safeguards	What If Recommendations	Rec ati	dual Afte omm ons Risk duct	iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Plug is lost downhole and cannot be retrieved	1. Mechanical Failure	1. Financial impact	F	1	3	Low						
Adverse weather during Workover	1. Lightning, high winds, tornados	<ol> <li>Shut down of operation until weather passes</li> </ol>	F	1	4	Low						
Plug doesn't pressure test	1. Mechanical Failure	1. Financial impact	F	1	3	Low						
Obstruction in well casing	1. Bent Pipe, Salt Plug	<ol> <li>Inability to perform well work, delay in workover, Financial Impact</li> </ol>	F	2	2	Low						
There is a wireline breakage	<ol> <li>Failure of wireline, downhole conditions cause breakage in</li> </ol>	1. Potential injury to personnel	H& S	4	2	Medium	1. Wireline Job Hazard Analysis					1. Existing safeguard s
	wireline	2. Financial Loss, fishing required	F	2	2	Low	2. Wireline Maintenance					adequate
							<ol> <li>Restricted access to area</li> </ol>					
Leak in Pressure control equipment (IE Lubricator)	1. Mechanical Failure, o ring failure	1. Hydrocarbon to surface, environmental release	E	1	4	Low	1. Lubricator Maintenance					
		2. Hydrocarbon to surface, potential	H& S	4	1	Low	2. Pressure testing					
		fire/explosion hazards to personnel					<ol> <li>Blow out Preventer (BOP)</li> </ol>					
Tubing stuck in hole	1. Bent Pipe	1. Financial impact	F	2	2	Low						
Accumulator Fails (Loss of remote BOP operation)	1. Mechanical Failure	1. Lose the ability to remotely close BOP, potential release of	H& S	4	1	Low	1. Triple Redundancy					
		hydrocarbon if well is live					2. Manual Override on BOP					



### System: 2. Drilling/Workover Activities

### Subsystem: 3. Development Workovers

What If	Causes	Consequences	CA T	Ri A	sk, \dd F	erating , Before litional Risk luction	Safeguards	What If Recommendations	Rec at	dual Afte omm ions Risk duct	iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
BOP Fails	1. Mechanical Failure	1. Lose the ability to close BOP, potential release of hydrocarbon if	H& S	4	1	Low	1. Manual Override on BOP					
		occurs if well is live					2. Two sets of rams					
Casing Pressure test fails	1. Casing damage, corrosion, thread	1. Casing would need to be repaired (liner	F	2	3	Medium	1. Casing Design					1. Existing safeguard
	leaks	install), financial impact					2. Corrosion Logging					s adequate
							3. Casing Thread technician					
							<ol> <li>Assembly using hydraulic torque wrenches</li> </ol>					
Radioactive Logging tool lost in hole	1. Tool Stuck, wireline break, operator error	<ol> <li>Reporting required to Canadian Nuclear Safety Commission,</li> </ol>	E	2	2	Low						
		2. Potential Financial Loss	F	1	2	Low						



### System: 2. Drilling/Workover Activities

### Subsystem: 4. Abandonment

What If	Causes	Consequences	CA T	Ri A	sk, \dd F	erating Before litional Risk luction	Safeguards	What If Recommendations	Rec at	dual Afte omm ons Risk duct	iend for	Remarks
				s	L	RR	-		Sev erity	liho	Risk Ran king	Remark
Plug is lost downhole and cannot be retrieved	1. Mechanical Failure	1. Financial impact	F	1	3	Low						
Adverse weather during Workover	1. Lightning, high winds, tornados	<ol> <li>Shut down of operation until weather passes</li> </ol>	F	1	4	Low						
Plug doesn't pressure test	1. Mechanical Failure	1. Financial impact	F	1	3	Low						
Obstruction in well casing	1. Bent Pipe, Salt Plug	<ol> <li>Inability to perform abandonment, delay in abandonment, Financial Impact</li> </ol>	F	2	2	Low						
There is a wireline breakage	1. Failure of wireline, downhole conditions cause breakage in	1. Potential injury to personnel	H& S	4	2	Medium	1. Wireline Job Hazard Analysis					1. Existing safeguard s
	wireline	2. Financial Loss, fishing required	F	2	2	Low	2. Wireline Maintenance					adequate
							<ol> <li>Restricted access to area</li> </ol>					
Tubing stuck in hole	1. Bent Pipe	1. Financial impact	F	2	2	Low						
Accumulator Fails (Loss of remote BOP operation)	1. Mechanical Failure	1. Lose the ability to remotely close BOP, potential release of hydrocarbon if some still present	H& S	4	1	Low	<ol> <li>Triple Redundancy</li> <li>Manual Override on BOP</li> </ol>					
BOP Fails	1. Mechanical Failure	1. Lose the ability to close BOP, potential release of hydrocarbon if some still present	H& S	4	1	Low	<ol> <li>Manual Override on BOP</li> <li>Two sets of rams</li> </ol>					
Casing Pressure test fails	1. Casing damage, corrosion, thread	<ol> <li>Casing would need to be repaired (liner</li> </ol>	F	2	3	Medium	1. Casing Design					1. Existing safeguard
	leaks						2. Corrosion Logging					



### System: 2. Drilling/Workover Activities

### Subsystem: 4. Abandonment

What If	Causes	Consequences	CA T	Ri A	isk \de	k, B diti Ris	ating lefore ional sk ction	Safeguards	What If Recommendations	Rec at	dual Afte omm ions Risk educt	iend for	Remarks
				s	L	-	RR			Sev erity	liho	Risk Ran king	Remark
		install), financial impact						<ol> <li>Casing Thread technician</li> <li>Assembly using hydraulic torque wrenches</li> </ol>					s adequate
Soil Contamination Present	1. Historic hydrocarbon leaks into soil	<ol> <li>Remediation require to return land to acceptable state</li> </ol>	F	2	5	5 Me	edium						1. Existing safeguard s adequate
Digging Equipment Strikes Underground Pipe	1. Underground pipes in general area	1. Pipe Loss of containment, environmental release	E	3	2	2 <b>M</b> e	edium	1. One Call					1. Existing safeguard s adequate
		2. Potential hazards to personnel	H& S	4	2	2 <b>Me</b>		<ol> <li>Ground Disturbance Procedure</li> <li>Well Placement with offset from underground piping</li> </ol>					



System: 3. Operations

What If	Causes	Consequences	CA T	Ri A	sk Idc F	erating , Before litional Risk luction	Safeguards	What If Recommendations	- Rec ati	Afte	nend for	Remarks
				s	L	RR	-		Sev erity		Risk Ran king	Remark
Wellhead impacted by vehicle during operation	1. Slippery Conditions causing vehicle to lose control and strike wellhead	1. Shearing of wellhead, Loss of containment, Environmental impact	E	4	1	Low	1. Driver Training program					
		2. Shearing of wellhead, Potential Personnel Hazards	H& S	4	1	Low	2. Wellhead robustness					
		<ol> <li>Shearing of wellhead, Financial Loss, operational impact</li> </ol>	F	3	1	Low	3. Posted Speed limits					
		4. Minor Damage to wellhead, environmental release	E	2	1	Low	<ol> <li>Well area chained off, visible barrier</li> </ol>					
Corrosion in well exceeds allowable by code	<ol> <li>Casing corrosion grows over time, eventually will exceed code if not</li> </ol>	<ol> <li>Financial Impact of replacing corroded casing</li> </ol>	F	2	3	Medium	1. Corrosion Logging					1. Existing safeguard s
	replaced	2. Corrosion causes loss, of casing integrity, leak in casing, financial impact	F	2	3	Medium	2. Mechanical Integrity Testing Program, as per Ontario operating standard and per CSA Z341					adequate
hydrocarbon	1. Overflow of brine into hydrocarbon	<ol> <li>Salt in hydrocarbon pipe, financial burden</li> </ol>	F	1	4	Low	1. Density Monitoring					
withdrawn from well	system						<ol> <li>Low inventory shutdowns</li> </ol>					
							<ol> <li>Differential pressure shutdown</li> </ol>					
Excessive hydrocarbon added to well	<ol> <li>Hydrocarbon into brine string</li> </ol>	1. hydrocarbon into brine system, into degas vessel, to flare, Environmental Impact	E	2	3	Medium	1. Density Monitoring S/Ds EV-XXX7					1. Existing safeguard s adequate



### System: 3. Operations

What If	Causes	Consequences	CA T	Ri: A	sk, Idd R	rating Before itional tisk uction	Safeguards	What If Recommendations	Rec at	dual Afte omm ions Risk educt	nend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
		2. Loss of product, Financial Impact	F	1	3	Low	2. High Pressure S/D on Brine System, EV-XXX7					
Terrorism/Vandalism	of public intentionally	<ol> <li>Loss of Containment, Personal injury</li> </ol>	H& S	4	1	Low	1. Fenced Perimeter with Card access					
	damages wellhead						2. Video camera system					
							3. 24/7 Manned Facility					
Annulus Valve Leaks	1. Normal wear and tear on valve	1. Release to atmosphere, Environmental Impact	H& S	2	2	Low	1. Wellhead Gas Detection to DCS					
		2. Financial Loss	F	1	2	Low	2. 24/7 Manned Facility					
Solids in Cavern (Drill cuttings, etc.)	1. Normal course of operation	1. No Hazardous Consequences		1	1	Low						
Surface Casing Vent Leaks	1. Poor Cement Job, local geology	1. Release to atmosphere, Environmental Impact	E	1	1	Low	1. Wellhead Gas Detection to DCS					
Seal problems that cause a wellhead leak	1. Normal wear and tear on wellhead	1. Release to atmosphere, Environmental Impact	H& S	2	2	Low	1. Wellhead Gas Detection to DCS					
		2. Financial Loss	F	1	2		2. 24/7 Manned Facility					
							3. 3. 10 year, CSA required workovers					
Salting Off of tubing string	1. Cooling of brine, salt falls out	1. Financial Loss, Operational Inconvenience	F	1	5		<ol> <li>Brine Flow meter</li> <li>Pressure Transmitter on wellhead</li> </ol>					1. Existing safeguard s adequate
Brine Stringer break		<ol> <li>hydrocarbon into brine system, into degas vessel, to</li> </ol>	E	2	2	Low	1. Density Monitoring S/Ds EV-XXX7					



### System: 3. Operations

What If	Causes	Consequences	CA T	Operating Risk, Before Additional Risk Reduction			Safeguards	What If Recommendations	Residual Risk - After Recommend ations for Risk Reduction			Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
	1. High flow in stringer causing vibration, fails stringer	flare, Environmental Impact										
		2. Loss of product, Financial Impact	F	2	2	Low	<ol> <li>High Pressure S/D on Brine System, EV-XXX7</li> </ol>					
							<ol> <li>Differential pressure shutdown</li> </ol>					
Flange on wellhead leaks	1. Normal wear and tear on wellhead	1. Release to atmosphere, Environmental Impact	H& S	2	2	Low	1. Wellhead Gas Detection to DCS					
		2. Financial Loss	F	1	2	Low	2. 24/7 Manned Facility					
							3. 10 year, CSA required workovers					
Wellhead studs & nuts excessive corrosion	1. Weather erodes steel of nuts and bolts	1. Release to atmosphere, Environmental Impact	H& S	2	2	Low	1. Wellhead Gas Detection to DCS					
		2. Financial Loss	F	1	2	Low	<ol> <li>2. 24/7 Manned Facility</li> <li>3. 10 year, CSA required workovers</li> </ol>					
Master valve seizes open	1. Normal wear and tear on valve	1. Inability to perform well work, Financial burden	F	1	3	Low	1. 10 year, CSA required workovers					
Master valve seizes closed	1. Normal wear and tear on valve	1. Inability to perform well work, Financial burden	F	1	3	Low	1. 10 year, CSA required workovers					
Master valve fails to seal	1. Normal wear and tear on valve	<ol> <li>Inability to perform well work, Financial burden</li> </ol>	F	1	3	Low	1. 10 year, CSA required workovers					
Off spec product sent into cavern	1. Operator Error, or Off spec Product sent to facility	1. Financial Loss	F	1	4	Low	1. Density Monitoring					
	undetected						2. Spot Check Sampling, Checks					



### System: 3. Operations

What If	Causes	Consequences	CA T	Operating Risk, Before Additional Risk Reduction		Before litional Risk	Safeguards	What If Recommendations	Residual Risk - After Recommend ations for Risk Reduction			Remarks
				s	L	RR			Sev erity	IIIIO	Risk Ran king	Remark
							on Railcars and Pipelines					
Diluted brine sent into cavern	1. Rain causes diluted brine in pond	<ol> <li>Unintentional Cavern mining, cavern gets slightly bigger</li> </ol>	F	1	5		<ol> <li>Density Monitoring</li> <li>CSA regulated sonar surveys every 10 years to monitor growth</li> </ol>					1. Existing safeguard s adequate
Excessive Flow rate in/out of well	<ol> <li>High flow in stringer, causing vibration, fails stringer</li> </ol>	1. hydrocarbon into brine system, into degas vessel, to flare, Environmental Impact	E	2	2	Low	1. Density Monitoring S/Ds EV-XXX7					
		2. Loss of product, Financial Impact	F	2	2		<ol> <li>2. High Pressure S/D on Brine System, EV-XXX7</li> <li>3. Differential pressure</li> </ol>					
NORMS present in Propane	1. NORM contaminated product from other facility	1. Potential exposure to radiation for personnel, hazards to personnel (maintenance activities)	H& S	1	3		shutdown 1. Procedure during activities where potential for NORMS exist					



System: 3. Operations

Subsystem: 2. Brine System Operations

What If	Causes	Consequences	CA T				Safeguards	What If Recommendations	Rec ati	dual Afte omm ons Risk duct	iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Excessive Erosion/Corrosion in Brine Piping	1. Brine is corrosive/erosive, potential for air ingress to accelerate corrosion	1. Failure of Brine Piping, release of brine, environmental impact	E	2	3	Medium	1. Pembina Pressure Equipment Integrity Management Program					1. Existing safeguard s adequate
							2. Operator Rounds					
Extreme Cold causes brine to freeze	1. Ambient Weather Conditions	1. Operational Upset, Financial Impact	F	1	4	Low	1. Operator Rounds					<ol> <li>Existing safeguard s</li> </ol>
		<ol> <li>Failure of Brine Piping, release of brine, environmental impact</li> </ol>		2	3	Medium	2. Flow meter					s adequate
EV-XXX7 Fails to close when needed	1. Mechanical Malfunction, Frozen, salt debris in valve	operations need to close master valve, operation inconvenience, shutdown slower than normal, environmental	E	2	2	Low	<ol> <li>Operations can close PV-XXX9</li> <li>Weekly Brine EBV</li> </ol>					
							checks					
							3. DCS Alarms					
		release extended					4. EV Limit switches					
EV-XXX7 stuck closed	1. Airline freezes, solenoid fails, DCS failure	1. Operational Upset, Financial Impact	F	1	5	Medium	1. Procedure for blowing airlines					<ol> <li>Existing safeguard s</li> </ol>
							2. Redundant caverns					adequate
EV-XXX7 Passes	1. Valve wear and tear	<ol> <li>Hydrocarbon passes into brine system, environmental impact</li> </ol>	E	1	3	Low	Operations can close PV-XXX9      Weekly Brine EBV checks					
							3. DCS Alarms					
PV-XXX9 Fails Open	1. Normal Operation	1. No Hazardous Consequences		1	1	Low						



## System: 3. Operations

#### Subsystem: 2. Brine System Operations

What If	Causes	Consequences		Operating Risk, Befor Additional Risk Reduction			Safeguards	What If Recommendations	Rec at	dual Afte omm ons f Risk	iend for	Remarks
			S L RR		RR			Sev erity	liho	Risk Ran king	Remark	
PV-XXX9 Fails Closed	<ol> <li>Airline freezes, positioner fails, DCS failure</li> </ol>	1. Operational Upset, Financial Impact	F	1	5	Medium	<ol> <li>Procedure for blowing airlines</li> <li>Redundant caverns</li> </ol>					1. Existing safeguard s adequate
PV-XXX9 Passes	1. Normal wear and tear on valve	1. No Hazardous Consequences		1	1	Low						
Operator close brine manual valve inadvertently	1. Operator Error	<ol> <li>Potential for vacuum on cavern, potential for high flow in stringer if valve is suddenly opened, could lead string damage, environmental impact</li> </ol>	E	2	2	Low	1. Standard Operating Practices					
		2. Financial impact	F	2	2		<ol> <li>Lock Out / Tag Out Procedure</li> <li>PV-XXX9</li> </ol>					
Brine Stringer Break	1. See Downhole Operations	1. See Downhole Operations		1	1	Low						
Terrorism/Vandalism	1. See Downhole Operations	1. See Downhole Operations		1	1	Low						



## System: 3. Operations

Subsystem: 3. Hydrocarbon System Operations

### Document:

## Design Conditions/Parameters:

What If	Causes	Consequences		Operating Risk, Before Additional Risk A Reduction			Safeguards	What If Recommendations	Rec ati	dual Afte omm ons Risk duct	r iend for	Remarks
				s	L	RR			Sev erity	liho	Risk Ran king	Remark
Excessive Corrosion in Propane Piping	1. External corrosion cause by weather	1. Loss of containment of hydrocarbon piping, environmental release	E	2	2	Low	<ol> <li>Gas leak detection, alarm, trip</li> </ol>					
		2. Financial impact	F	1	2	Low	2. Operator Rounds					
		<ol> <li>Potential for fire/explosion, hazards to personnel</li> </ol>	H& S	4	1	Low	3. Personal Gas detection					
							4. Pembina Pressure Equipment Integrity Management Program					
EV-XXX4 Fails to close when required	1. Mechanical Malfunction, Frozen,	maximum cavern operation pressure,		3	1	Low	<ol> <li>Built in safety factor into operating pressure limit</li> </ol>					
		potential for cavern fracture, Loss of cavern usage, financial impact.					2. PV-XXX3					
							3. Manual Block valves					
							4. Pressure Transmitter on wellhead					
							5. Flow Meter FIT- XXX1					
EV-XXX4 Closes inadvertently	1. Airline freezes, solenoid fails, DCS failure	1. Financial Loss, Operational Inconvenience	F	1	5	Medium	1. Procedure for blowing airlines					<ol> <li>Existing safeguard s</li> </ol>
							2. Redundant caverns					adequate
EV-XXX4 Passes	1. Normal wear and tear on valve	<ol> <li>Overpressure of cavern above maximum cavern operation pressure, potential for cavern</li> </ol>	F	3	1	Low	1. Built in safety factor into operating pressure limit					
		fracture, Loss of					<ol> <li>Quarterly HC EV testing</li> </ol>					



		cavern usage, financial impact.					3. Operator rounds					
							4. Pressure Transmitter on wellhead					
							5. Flow Meter FIT- XXX1					
PV-XXX3 Seizes Open	1. Debris, mechanical Failure	1. High Flow into Cavern, high brine flow out, potential stringer damage, Environmental Damage	E	2	2	Low	1. EV-XXX4					
		2. Financial impact	F	2	2	Low	2. Flow Meter FIT- XXX1					
							3. Manual Block Valves					
PV-XXX3 Fails Closed	1. Airline freezes, solenoid fails, DCS failure	1. Financial Loss, Operational Inconvenience	F	1	5	Medium	1. Procedure for blowing airlines	<ol> <li>Add Gate Valve downstream of globe valve around PV-</li> </ol>	1	5	Me diu m	1. Existing safeguard s
							2. Redundant caverns	XXX3				adequate
							<ol> <li>Manual Bypass around valve</li> </ol>					
PV-XXX3 Passes	1. Normal wear and tear on valve	1. No Hazardous Consequences		1	1	Low						
Operator closes manual valve inadvertently	1. Operator Error	1. No Hazardous Consequences		1	1	Low						
Terrorism/Vandalism	1. See Downhole Operations	1. See Downhole Operations		1	1	Low						



## "What If" Recommendations

	Place(s) Used		Maximum Risk					% C 0	Estimated Dates		Actual	Dates	Co		
Recommendations		Responsibilit y	Before Action		Rec Pri	Rec Cat	Statu s	p I e t	Start Date	End Date	Start Date	End Date	Estimated	Actual	Comments
<ol> <li>Add Gate Valve downstream of globe valve around PV-XXX3</li> </ol>	Causes: 3.3.6.1	Chad Severs	Medium	Medium		Enginee ring	In Progre ss		7/1/201 6	8/31/20 16			\$2500		
2. Perform Rig Move assessment, consider height, width, weight over underground facilities. If height of powerlines is a concern, reroute lines before rig move	Causes: 2.1.8.2, 2.2.4.1	Scott Morris	Low	Low	7	Administ ration	In Progre ss		7/1/201 6	12/31/2 016			\$2000		

# Conclusions

The "What If" hazard analysis completed for the Cavern 45 redrill was completed in a one day session. In the team's opinion the assessment comprehensive and consistent with Pembina's risk tolerance as well as met the requirements as set out in CSA Z341.2-14.

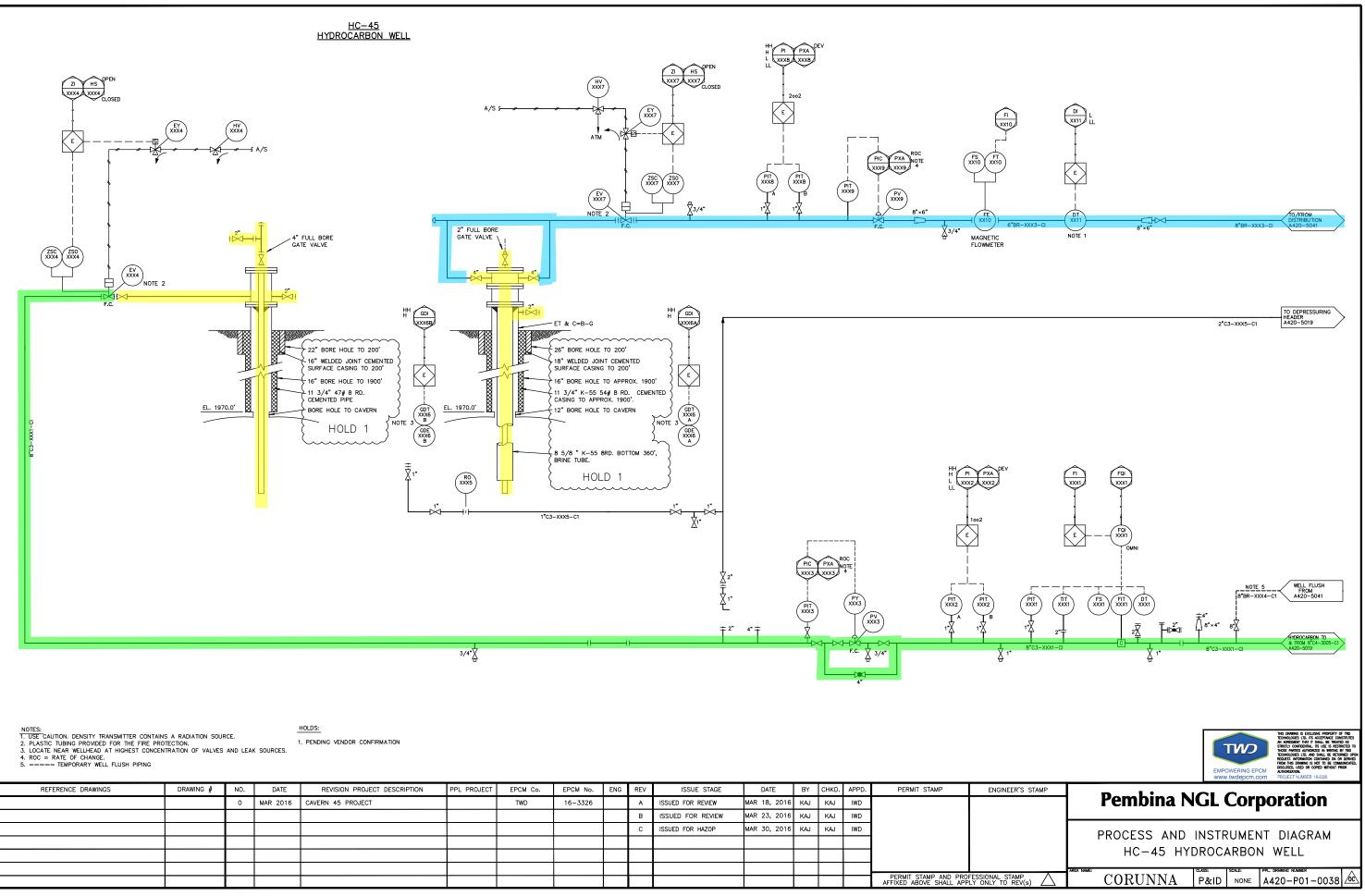
Over the 3 systems analyzed 112 Potential Hazards were identified. Those 112 hazards had a total of 153 consequences related to them. As per the Pembina Risk Assessment Matrix 123 of these consequences were deemed "Low" risk and 30 were deemed "Medium" risk with all existing safeguards considered. The medium risk items were all considered as low as reasonably practicable by the "What If" team.

Two recommendations were generated out of this review, they have been assigned to the appropriate parties and will be completed within the timelines outlined within the recommendations section.

This analysis has satisfied both Pembina's and CSA's requirements and there are no identified hazards that have residual risk above the acceptable levels deemed by the Pembina Risk Matrix. The "What If" team concludes the study and the project can continue as planned.



# Appendix A – Noded Process and Instrumentation Diagrams (P&IDS)



REFERENCE DRAWINGS	DRAWING #	NO.	DATE	REVISION PROJECT DESCRIPTION	PPL PROJECT	EPCM Co.	EPCM No.	ENG	REV	ISSUE STAGE	DATE	BY	CHKD.	APPD.	PERMIT STAMP	ENGINEER'S ST	
		0	MAR 2016	CAVERN 45 PROJECT		TWD	16-3326		А	ISSUED FOR REVIEW	MAR 18, 2016	KAJ	KAJ	IWD			
									В	ISSUED FOR REVIEW	MAR 23, 2016	KAJ	KAJ	IWD			
									С	ISSUED FOR HAZOP	MAR 30, 2016	KAJ	KAJ	IWD			
															PERMIT STAMP AND PROFESSIONAL STAN AFFIXED ABOVE SHALL APPLY ONLY TO RE		

