



July 17, 2017

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TED/ONE

Plains Midstream Canada (ULC)
Suite 1400, 607 8 Avenue S.W.
Calgary, Alberta T2P 0A7

[Redacted]
Telephone: [Redacted]
Facsimile: [Redacted]
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NATIONAL ENERGY BOARD
517 Tenth Avenue S.W.
Calgary, Alberta T2R 0A8

Attention: Ms. Sheri Young
Secretary of the Board

**Re: Plains Midstream Canada ULC (Plains)
Aurora Pipeline Company Ltd. (Aurora)**

Dear Ms. Young:

In accordance with the focused audit on sub-element 4.2 *Investigation of Incidents, Near-misses and Non-compliance* of the NEB Management System and Protection Program Audit Protocol, please accept the attached revised corrective action plan for findings four and six in response to the letter received from the Board on June 26th, 2017.

If you require any additional information or have any questions, please contact me at [Redacted] or by email at [Redacted] at your convenience.

Sincerely,

[Redacted Signature]

Attachments:

Attachment A:
Corrective Action Plan (Findings 4&6)

NEB 4.2 Investigation and Reporting Incidents and Near Misses Focused Audit CAP Supplement (Finding 4 & 6)

Audit Report Finding (Non compliant Expectation) Reference	Gap	Ref #	Corrective Action (Action Item in Octane)	How to verify closure	Action Item Due Date
Appendix I - Audit Protocol Part 1					
Finding 4: Plains did not have a process that met the Board's definition of Established for communication of findings and learnings related to incidents and near-misses. This is non-compliant with OPR s.6.5(1)(m).	Plains did not have a formal process in place exceeding the minimum 90 day requirement to be considered implemented.	pg 15/16	PMC will continue to implement PMC's documented process for communication of findings, follow-up and shared learnings and will meet the NEB's definition for established for 90 days by 24th July 2017.	-Approved Lessons Learned Process -Sample of recent outputs of the Lessons Learned Process (lessons learned communications)	End of Q4 2017
Appendix II - Audit Protocol Part 2					
Finding 6: Plains has not conducted an internal audit that includes requirements for performing incident investigations.	An internal audit of Sub-Element 5.5 has not yet been conducted.	pg 16/16	Sub Element audits planned for 2017 and on will include 5.5 (Incident Investigation) requirements as applicable. PMC will develop the protocol for the comprehensive 5.5 Incident Management Sub-Element Audit and move up the timeline on the 1+5 Year Audit Plan from currently scheduled execution in 2020 to 2019 approximately 1 year following changes to the Sub-Element documentation addressed in other corrective actions.	-Approved and communicated 1+5 Year Rolling Audit Plan -Evidenced inclusion of Sub-Element 5.5 requirements in 2017 Audits -Sub-Element 5.5 Audit Protocol	End of Q2 2018