

National Energy
Board



Office national
de l'énergie

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To: All Companies under National Energy Board Jurisdiction
Canadian Energy Pipeline Association
Canadian Association of Petroleum Producers
Provincial and Territorial Regulators

**National Energy Board Safety Advisory
NEB SA 2018-01
Introduction of Hydrocarbons or Any Other Commodity into Piping
Prior to Leave to Open**

Please find attached Safety Advisory SA 2018-01.

The National Energy Board (NEB or the Board) expects regulated companies to demonstrate a proactive commitment to continual improvement in safety, security and environmental protection, and to promote a positive safety culture as part of their management systems.

Safety Advisories are issued periodically in order to improve NEB-regulated industry's awareness of an identified safety or environmental concern with the goal of preventing incidents from occurring in the first place. A Safety Advisory also serves to further highlight NEB requirements, and conveys the Board's expectation that regulated companies take appropriate action to mitigate any potential impacts to people or the environment.

If you have any questions regarding this advisory please contact Pipeline Integrity personnel at the Board through our toll free number at 1-800-899-1265.

Yours truly,

Original signed by L. George for

Sheri Young
Secretary of the Board

Attachment

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Introduction of Hydrocarbons or Any Other Commodity into Piping Prior to Leave to Open

Background

The National Energy Board (NEB or Board) is aware of instances where a company under NEB jurisdiction has introduced hydrocarbons into piping as part of commissioning activities¹ prior to the Board having granted Leave to Open (LTO).

The Board is issuing this Safety Advisory to all regulated companies to clarify the Board's expectations regarding the practice of introducing hydrocarbons or any other commodity into piping as part of commissioning activities prior to LTO being granted.

Preventive Actions

The Board requires companies to file LTO applications in order to ensure the completed pressure testing meets the requirements of the *Onshore Pipeline Regulations* (OPR) and Canadian Standards Association (CSA) Standard Z662 *Oil and Gas Pipeline Systems*. This helps to ensure the safety of the pipeline prior to operation, and to minimize the likelihood of an incident that could cause harm to the public, company employees, property or the environment.

The Board notes there are safety concerns with the practice of introducing hydrocarbons or any other commodity into piping as part of commissioning activities prior to LTO being granted. The Board advises that this practice should not be engaged in prior to LTO being granted. Companies engaging in this practice are liable to enforcement actions by the Board.

Further Information

If you have any questions regarding this advisory please contact Pipeline Integrity personnel at the Board through a toll free number at 1-800-899-1265.

¹ Not including pressure testing as per CSA Z662 Clause 8