APPLICANT:	**APPLICANT'S FILE:** C14386
PROJECT: Inuvialuit Energy Security Project	DATE: Sept 24 2021
SUBJECT: Arrangements of Materials and Equipment	PAGE: 1 OF: 2

Name of Regulation: Oil and Gas Installations Regulations (R-	Section/Sub-section/Paragraph: 2.2, 9, 10

REQUESTING: Regulatory Deviation pursuant to sub-section 54(1)(a) of Oil and Gas Operations Act

REGARDING: Safety

TYPE OF DEVIATION / EXEMPTION: Standard

QUERY: Use current version of reference standard or code

PROPOSAL: See attached

RATIONALE: See attached

(USE ADDITIONAL PAGES IF NECESSARY)

APPLICANT

NAME: Travis Balaski	SIGNATURE: Travis Balaski Digitally signed by Travis Balaski Date: 2021.09.24 07:38:40 -06'00'
TITLE: Operations Lead	TEL. #: 1 403-461-6513

REVIEWERS

OPERATOR'S CONCURRENCE (IF NOT APPLICANT)

NAME:	SIGNATURE:	
TITLE:	TEL. #:	DATE

WORKPLACE OH&S COMMITTEE OR REPRESENTATIVE CONSULTED (IF APPLICABLE)

NAME: Alan MacDonald	SIGNATURE:	
TITLE: HESQ Lead	TEL. #: 4038624905	DATE Sept 30/21

CERTIFYING AUTHORITY CONCURRENCE OR COMPETENT INDEPENDENT THIRD-PARTY FOR ONSHORE[1]

PROPOSAL MEETS REQUIREMENTS OF THE *OIL AND GAS CERTIFICATE OF FITNESS REGULATIONS*, SECTION 3(2)(a)(ii)

NAME: Brent Jones	SIGNATURE:	Brent Jones Digitally signed by Brent Jones Date: 2021.10.12 16:03:49 -06'00'
TITLE: Project Manager	TEL. #: 1-403-461-7673	DATE Oct 12 2021

FOR USE BY CHIEF CONSERVATION OFFICER OR CHIEF SAFETY OFFICER:

Date Received:

Application No.:

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[1] *Oil and Gas Certificate of Fitness Regulations* is applicable to installations at offshore production or drilling sites. For onshore areas, this section shall be signed by a competent independent third-party e.g., Professional Engineer.

IESP Deviation Request #04 – OGOA IR Sections 2.2, 9, and 10

Proposal

It is proposed that the requirements of Section 2.2, Section 9 and Section 10 of the Oil and Gas Operations Act – Oil and Gas Installations Regulations 2014 (OGOA IR) are replaced or supplemented with the following API and/or CSA standards. For the Inuvialuit Energy Security Project (IESP), the Inuvialuit Petroleum Corporation (IPC) propose that the codes that will be used will be as stated in the following table:

OGOA IR Section	Component	Current Requirement	Proposed Deviation
2.2	Electrical Area Classifications	API RP 500	Follow API RP 505, 2nd Edition supplemented by Canadian Electrical Code CSA C22.1:21 or API RP 500, 3rd Edition.*
9	Access to Hazardous Areas	No Standard specified.	Follow API RP 505, 2nd Edition supplemented by Canadian Electrical Code CSA C22.1:21 or API RP 500, 3rd Edition.*
10	Ventilation of Hazardous Areas	No Standard specified.	Follow API RP 505, 2nd Edition supplemented by Canadian Electrical Code CSA C22.1:21 or API RP 500, 3rd Edition.*

Rationale

The Proposed Standard (*API Recommended Practice 505, Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Zone O, Zone 1, and Zone 2, Second Edition*) is the most detailed methodology available to classify areas related to Oil and Gas installations; and is more detailed than API RP 500.   IESP shall follow the latest version of API RP 505, supplemented by the current version of the Canadian Electrical Code CSA C22.1:21 and API RP 500 (*Recommended Practice for Classification of Locations for Electrical Installations at Petroleum Facilities Classified as Class I, Division 1 and Division 2; Third Edition*).

Closure

No negative consequence to health, safety, environment, or resource conservation would be reasonably expected by granting this deviation.

IPC maintain that safety, environmental protection, and resource conservation would be enhanced due to adherence to more current, applicable, detailed, and stringent codes proposed in this deviation request.