



OF-Surv-OpAud-MI82-2017-2018 01  
26 July 2018

Mr. Ken From  
President and CEO  
SaskEnergy Incorporated  
(Many Islands Pipe Lines (Canada) Limited)  
1000-1777 Victoria Avenue  
Regina, SK S4P 4K5  
Email: [REDACTED]

Dear Mr. From:

**National Energy Board (NEB or Board)  
Corrective and Preventive Action Plan (CAPA Plan) for Review  
Many Islands Pipe Lines (Canada) Limited**

On 3 October 2017, the Board informed Many Islands Pipe Lines (Canada) Limited (MIPL(C)L) of its intent to audit its NEB regulated facilities. During this focused audit, the Board evaluated Emergency Management and related inputs and outputs as captured in sub-element 2.1 *Hazard Identification, Risk Assessment and Control* of the NEB Management System and Protection Program Audit Protocol.

The findings of the Audit are based upon an assessment of whether MIPL(C)L was compliant with the regulatory requirements contained within:

- the *National Energy Board Act* and its associated regulations, including;
- the *National Energy Board Onshore Pipeline Regulations* (OPR);
- Any conditions contained within applicable Board certificates or orders issued by the Board (collectively referred to as, Legal Requirements).

MIPL(C)L submitted its proposed Corrective and Preventive Action Plan (CAPA Plan) that describes the methods and timing for addressing the non-compliances identified through this audit on 21 June, 2018. The Board has completed its review and hereby approves the CAPA Plan with the amendments outlined in the attached Table 1.

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Over the next few months, the NEB will review the documents and deliverables as outlined by MIPL(C)L's CAPA Plan. Each finding will be considered resolved when all of the deficiencies as described in the report have been addressed in accordance with the legal requirements and the commitments and the actions described in the CAPA Plan. Implementation Assessment meetings will be organized to discuss actions taken. In addition, the NEB will verify that the CAPAs include measures to prevent recurrence.

The Board will make the approved CAPA Plan public and will continue to monitor and assess all of MIPL(C)L's corrective actions with respect to this audit until they are fully implemented. The Board will also continue to monitor the implementation and effectiveness of MIPL(C)L's management system and programs through targeted compliance verification activities as a part of its on-going regulatory mandate.

If you require any further information or clarification, please contact Marnie Sparling, Lead Auditor, at 403-629-6394.

Yours truly,

*Original signed by*

Sheri Young  
Secretary of the Board

c.c. 

**Table 1: MIPL(C)L CAPA Plan Board Directed Amendments**

The Board hereby directs that the due dates are revised as follows:

| AP #   | Regulatory Requirement  | Revised due date  |
|--|---|-------------------|
| OPR s. 6.5 (1) A company shall, as part of its management system and the programs referred to in section 55, |   |                   |
| AP 07  | (c): establish and implement a process for identifying and analyzing all hazards and potential hazards;   | 28 September 2018 |
| AP 08  | (d) establish and maintain an inventory of the identified hazards and potential hazards;  | 31 October 2018   |
| AP 09  | (e) establish and implement a process for evaluating and managing the risks associated with the identified hazards, including the risks related to normal and abnormal operating conditions;                                    | 30 November 2018  |
| AP 10  | (f) establish and implement a process for developing and implementing controls to prevent, manage and mitigate the identified hazards and the risks and for communicating those controls to anyone who is exposed to the risks; | 15 January 2019   |