



February 10, 2010

Minister Blair Lekstrom
Room 133
Parliament Buildings
Victoria, BC V8V 1X4

Alex Ferguson
Commissioner, British Columbia Oil and Gas Commission
PO Box 9331 Stn Prov Govt
Victoria BC V8W 9N3

Sent by Email and Fax

**Re: November 22, 2009 Well Failure
EnCana Swan Well Site A5-7-77-14 L W6M**

We undersigned individuals and organizations write with regard to the Nov 22, 2009 sour gas release near Pouce Coupe, British Columbia. We are aware that the Peace Environment and Safety Trustees are calling for a public inquiry into this occurrence. We support their call for a public inquiry.

We also request that no further steps be taken to finalize the draft Consultation and Notification Regulation under the *Oil and Gas Activities Act* until the concerns raised by the Pembina Institute, and by Gwen Johansson (endorsed by NEEMAC land-based representatives), and shared with the Oil and Gas Commission, have been fully addressed.

This sour gas mishap, and the subsequent investigation are a strong reminder that concern about public health and safety must be paramount wherever the oil and gas industry operates. In the past 10 years, gas development activity in northeastern British Columbia has risen steadily. It is always hazardous, and government has a particularly high responsibility to ensure the safety of those whose homes and communities stand to be adversely affected by oil and gas operations.

Among other things, the Oil and Gas Commission’s Incident Report (Feb 4, 2010) found that:

- More than seven hours elapsed from the time the sour gas leak was first detected without any response from EnCana;
- Leak detection and emergency isolation at the site failed to detect the leak in a timely way or control the escaping gas;
- There was no coordination between the RCMP and EnCana prior to the RCMP’s odour notification; and





- EnCana’s response did not conform to their emergency response plan.

These findings are even more disturbing when considered in the context of broader industry non-compliance. Several years ago, a Vancouver Sun audit found that non-compliance rates were between 62 and 64 per cent (Oil and Gas Audit Reveals Non-compliance, May 16, 2005). Similarly, a review by the Pembina Institute in 2006 found that while the number of wells being drilled was steadily increasing, significantly fewer inspections were being conducted on the land (<http://bc.pembina.org/pub/1305>).



FOREST ETHICS

We believe that a public inquiry that seeks to address landowner concerns about public health and safety, clear resolution to the concerns identified by some organizations with respect to the draft Consultation and Notification Regulation, and a careful implementation of the *Oil and Gas Activities Act*, taking into account landowner and community sensitivities, is a critical part of addressing the challenges posed by this industry.



We support the efforts of local organizations to remedy their concerns, and look forward to your response.



Healthy Oceans. Healthy Communities

Sincerely,



Lois Hill
Box 84
Farmington, BC
V0C 1N0

Karen Campbell
Pembina Institute
610 – 55 Water St
Vancouver, BC, V6B 1A1



Regional Organizations:

John Bergenske, Executive Director, WildSight
Brian Churchill, Director, Peace Valley Environmental Association
Ian Dobson, President, Prince Rupert Environmental Society
Trevor Ellingson, President, Fort Nelson Trappers Association
Carl Gitscheff, President, Dawson Creek Trappers Association
Shaun Grant, NEEMAC Committee Representative, South Peace Region, B.C. Grain Producers Association
Shannon McPhail, Executive Director, Skeena Watershed Conservation Coalition
Jane Parsons, President, Landry Women’s Institute, Farmington
Kim Strasky, Chair, Farmington Farmerettes
Lawrence Strocher, Current Co-Chair, Pembina Agricultural Protection Association
James E Vince, President, Fort St. John Trappers Association
Lyle Voegtlin, Board Member, Round Hill – Dodds Agricultural



Protective Association, Kingshill, Alberta
Roland Willson, Chief, West Moberly First Nation
Norma Williams, Secretary, The Voice of Community and Land Society,
Kingman, Alberta
Happy Valley Surface Rights Association, Spirit River, Alberta

Individuals:

Jacqueline Armbruster, Fort St. John
Dean Bentley, Fort St. John
Wendy Blackman, Fort St. John
Richard Broswick, Pouce Coupe
Brian Churchill, Fort St. John
Rita Churchill, Fort St. John
Kirk Cowell, Spirit River, Alberta
Stephanie Cowles, Spirit River, Alberta
Christopher Fast, Dawson Creek
Rio Fitch, Rolla
Linda Fontaine, Dawson Creek
Chantelle Fowler, Fort St. John
Bruce Haley,, Charlie Lake
Lynn Haugen, Dawson Creek
Angela Hofstrand, Charlie Lake
Larry Houley, Charlie Lake
Donna Kay, Rolla
Margaret Keith, Farmington
Holly Kirkpatrick, Fort St John
Rick Koechl, Charlie Lake
Jason Levesque, Charlie Lake
Clara London, Charlie Lake
Dale London, Charlie Lake
Inge-Jean Mattson, Rolla
Karl Mattson, Rolla
Aaryn Norman. Dawson Creek
Josh Page, Fort St. John
Donald A. Pettit, Dawson Creek
Priscilla Phillips, Fort St. John
Ron Reznicek, Farmington
Verena Reznicek, Farmington
Verna Savor, Pouce Coupe
Wayne Sawchuk, Rolla
Adam Stefiuk, Fort St. John
Barbara Swail, Dawson Creek
Judy Taylor, Stavely, Alberta
John Wark, Dawson Creek
Norine Wark, Dawson Creek

S. Wildeman, Fort St. John
Jeff Weening, Fort St. John

Provincial Organizations:

Gwen Barlee, Policy Director, Western Canada Wilderness Committee

Jessica Clogg, Executive Director, West Coast Environmental Law

Tom Hackney, V-P for Policy, BC Sustainable Energy Association

George Heyman, Executive Director, Sierra Club BC

Will Horter, Executive Director, Dogwood Initiative

Bryan Monroe, President, BC Trappers Association

Oonagh O'Connor, Energy Program Manager, Living Oceans Society

Chloe O'Loughlin, Executive Director, Canadian Parks and Wilderness Society, BC Chapter

Jennifer Rice, Energy Campaigner, T.Buck Suzuki Environmental Foundation

Nikki Skuce, Senior Energy Campaigner, ForestEthics

Jim Sinclair, President, BC Federation of Labour

Christianne Wilhelmson, Executive Director, Georgia Strait Alliance