

# Change highlights: Oil and gas wells – Part 37 in the OHS Code

## OHS information for work site parties

This bulletin introduces changes in Oil and gas wells – Part 37 of the [Occupational Health and Safety \(OHS\) Code](#).

### IMPORTANT

This is an overview of updates effective March 31, 2023. Consult the law directly to make sure you comply with all applicable requirements.

### KEY INFORMATION

- Part 37 identifies industry specific requirements for upstream operations (oil, gas or geothermal energy drilling, extraction and related decommissioning activities) but not downstream industries (transportation, processing, refining and retail sales).

### Repealed, changed and new requirements

Most changes in Part 37 involve removing duplication, streamlining or revising wording to improve clarity and intent, or aligning work site party responsibilities with those in the *Occupational Health and Safety (OHS) Act*. However, several changes are new or amended requirements that strengthen health and safety protections and better reflect conditions and equipment used on Alberta upstream operations. Table 1 highlights substantive changes; Table 2 shows duplicate provisions that have been repealed.

### TABLE 1: OHS CODE PART 37 CHANGES

This table gives an overview of substantive changes to Part 37 requirements. It does not include provisions that have been reworded for clarity, without any change in requirements.

Section number and title	Summary of changes
751.1 Health and safety orientation	New: The prime contractor – or the employer, if there is no prime contractor – must provide site-specific orientation to a worker before that worker comes onto the work site for the first time. The requirements of the orientation are set out in this new provision.
752.1 Work site organization	New: The prime contractor – or the employer, if there is no prime contractor – must ensure work sites are designed and constructed to ensure: <ul style="list-style-type: none"><li>the safe installation, operation, mobilization, demobilization and movement of all equipment that will be required for the work being performed,</li><li>the support of the gross weight of the equipment under maximum loads, and</li><li>that emergency response activities can be carried out safely.</li></ul>

### New definitions

The following definitions have been added to improve clarity.

- “Cathead” means a clutched spool connected to a drawworks power system used to create tension on chains, cables and ropes.
- “Drill stem test” means a procedure for isolating and testing the pressure, permeability and productive capacity of a geological formation during the drilling of a well by permitting the flow of formation fluids through the drill pipe.
- “Rotary table” means the part of a drilling rig designed to apply torque to the drill string.
- “Snubbing” means the act of moving tubulars into or out of a well bore when pressure is contained in the well.
- “Snubbing unit” means equipment used for snubbing.
- “Swabbing unit” means equipment used for well swabbing.
- “Well servicing” means maintenance work performed on an oil, gas or geothermal energy well to bring the well into initial production, after completion of initial production, during extraction activities, during decommissioning of the well and during any ancillary activities associated with these operations.
- “Well stimulation” means an activity performed to restore or enhance the productivity of a well.
- “Well swabbing” means a process to remove fluids from an oil or gas well to increase well productivity.

752.2 Purging lines	New: The prime contractor – or the employer, if there is no prime contractor – must ensure workers are protected from fire and explosion hazards if piping is purged using a flammable or combustible substance.
752.3 Firefighting equipment	New: The requirements for firefighting equipment have been updated to apply to all upstream operations rather than just one type (well stimulation requirement formerly found in Section 782). The prime contractor – or the employer, if there is no prime contractor – must ensure there is appropriate firefighting equipment in any work area where there is or may be a fire or explosion hazard.
754 Derricks and masts	Changes: <ul style="list-style-type: none"> <li>• Inspection outcome revised to ensuring “all equipment and component parts are secured and safe to operate”.</li> <li>• The requirements for raising and lowering a derrick or mast have been updated to include additional detail to ensure that these critical lifts are done safely. When hoisting a mast, employers must ensure the rigging is only attached to clearly marked, designated lifting points.</li> </ul>
755 Reports for equipment inspection and repairs	New: Record keeping requirements for employers and suppliers regarding rented or leased equipment used in upstream operations have been added. These replace requirements to use specific log books for recording equipment inspection and repair.
755.1 Reports for rented or leased equipment inspections and repairs	New: Employers and suppliers must keep records of inspections and repairs for equipment. Supplier must share information related to inspection and repair of leased equipment with employers who lease the equipment.
763 Guy lines and anchors	Changes: Incorporates requirements from Section 764 and updates the referenced technical standard.
765 Tubular storage	Change: Incorporates requirements from Section 772.
775 Counterweights	Change: Performance-based requirement to protect workers from being struck by counterweights.
776 Fluid pumping and piping systems	Changes: This section is revised to more clearly address all hazards related to pressure build-ups in systems: <ul style="list-style-type: none"> <li>• Drilling fluids” changed to “incompressible fluids” to ensure application to all liquids that are pumped in piping systems.</li> <li>• Incorporates requirements for piping from Section 783 and updates the referenced technical standard.</li> <li>• New requirement to control pressure at the wellhead when using a down-hole positive displacement pump.</li> <li>• New requirement with responsibility for both the employer and worker to ensure a valve is not closed on the discharge line of a positive displacement pump while the pump is in operation.</li> </ul>
776.1 Controlling pressure hazards	New: Provisions for controlling pressure hazards suggested by industry stakeholders to provide clarity, ensure health and safety, and align with provisions in other jurisdictions. Change: Incorporates provisions from Section 781 (testing) and Section 783 (flanges).
780 Well swabbing	New: When fluids are piped to a tank truck during well swabbing, the requirement to shut off the truck engine and have no workers in the cab of the truck does not apply under the following conditions: <ul style="list-style-type: none"> <li>• the engine must be running to operate the hydraulic or generator systems, and</li> <li>• the engine is equipped with a positive air shutoff system.</li> </ul>
781 Well servicing	Changes: <ul style="list-style-type: none"> <li>• Distance changed from six metres to seven metres to align with Alberta Energy Regulator Directive 037.</li> <li>• Prescriptive testing requirements changed to a performance-based requirement to ensure the system is operating properly.</li> </ul>

**TABLE 2: REPEALED REQUIREMENTS, PART 37**

This table lists the Part 37 sections that have been repealed (in part or in full) and why.

Section number and title	Reason for repeal	
751 Competent supervisor	Repealed in full	Duplicates OHS Act, Section 4.
752 Breathing equipment	Repealed in full	Duplicates OHS Code, Part 7 (sections 116 -118) and Part 8 (sections 244, 247, 252 and 253).
753 Operating load of derrick or mast	Repealed provision	Duplicates OHS Code, Section 12.
754 Derricks and masts	Repealed provision	Duplicates OHS Code, Section 12.
756 Drillers	Repealed provision	Duplicates OHS Code, Section 310.
757 Geophysical operations	Repealed in full	Duplicates OHS Code Part 17 and Part 19 requirements.
758 Drilling rig, service rig, and snubbing unit inspections	Repealed provision	Duplicates revised OHS Code, Section 755.
759 Overloaded service rig trucks	Repealed in full	Equipment must not be operated outside of its manufacturer specifications per OHS Code, Section 12.
760 Safety check	Repealed in full	Consolidated into Section 758.
761 Exits from enclosures	Repealed provision	Duplicates OHS Code, Part 8, Section 119.
762 Emergency escape route	Repealed provision	Duplicates OHS Code, Section 12.
764 Ground anchors	Repealed in full	Consolidated into Section 763.
767 Brakes	Repealed provision	Duplicates OHS Code, Part 25, Section 368.
771 Catheads	Repealed provisions	Requirements are not needed as rope-operated catheads are prohibited.
772 Racking pipes	Repealed in full	Consolidated into Section 765.
773 Rotary table danger zone	Repealed provision	Duplicates OHS Code Part 25, Section 362.
778 Prohibition of fuel storage	Repealed in full	Duplicates or conflicts with OHS Code Part 10 and Alberta Energy Regulator Directive 055.
779 Drill stem testing	Repealed provision	Duplicates OHS Code Part 12, Section 188.
781 Well servicing	Repealed provisions	Duplicate Part 12, sections 186 and 188; duplicate OHS Act, Section 3; consolidated into Section 776.
782 Well stimulation	Repealed provisions	One requirement consolidated into Section 752.3, another duplicates OHS Code, Section 12.
783 Well site piping systems	Repealed in full	Some requirements duplicate Part 12, Section 188. Others consolidated into Section 776.1.
784 Gas sample containers	Repealed provision	Duplicates OHS Code, Section 12.

## Contact us

### OHS Contact Centre

Anywhere in Alberta

- 1-866-415-8690

Edmonton and surrounding area

- 780-415-8690

Deaf or hard of hearing (TTY)

- 1-800-232-7215 (Alberta)
- 780-427-9999 (Edmonton)

### Notify OHS of health and safety concerns

[alberta.ca/file-complaint-online.aspx](https://alberta.ca/file-complaint-online.aspx)

Call the OHS Contact Centre if you have concerns that involve immediate danger to a person on a work site.

### Report a workplace incident to OHS

[alberta.ca/ohs-complaints-incident.aspx](https://alberta.ca/ohs-complaints-incident.aspx)

### Website

[alberta.ca/ohs](https://alberta.ca/ohs)

## Get copies of the OHS Act, Regulation and Code

### Alberta King's Printer

[alberta.ca/alberta-kings-printer.aspx](https://alberta.ca/alberta-kings-printer.aspx)

### OHS

[alberta.ca/ohs-act-regulation-code.aspx](https://alberta.ca/ohs-act-regulation-code.aspx)

## For more information

Alberta Energy Regulator Directive 055: Storage Requirements for the Upstream Petroleum Industry

[aer.ca/regulating-development/rules-and-directives/directives/directive-055](https://aer.ca/regulating-development/rules-and-directives/directives/directive-055)

OHS Code review

[alberta.ca/ohs-code-review.aspx](https://alberta.ca/ohs-code-review.aspx)

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