

## Well Test Reporting of Pressure and Deliverability Testing ERCB Enforcement of Low Risk Noncompliance

- Audience: All Stakeholders
- Purpose: To inform all stakeholders of the Low Risk Noncompliance Process for Well Test Reporting of Pressure and Deliverability Testing.
- Background: Effective January 1, 2006, [Directive 019: ERCB Compliance Assurance-Enforcement](#) superseded enforcement ladders of all other ERCB Directives and Guides. Enforcement actions begun under previous enforcement ladders and for which compliance had not been achieved by December 31, 2005, have been continued in accordance with *Directive 019*.

The following chart outlines how enforcement actions are now administered for noncompliance associated with the non-submission of initial pressure/deliverability or annual pressure surveys.

Note: The online listing of wells/pools requiring submission of test data will continue to be provided at:

[ERCB Web **path**] [ERCB Home / Industry Zone / Rules, Regulations, Requirements / Well Testing - Pressure Survey Schedules](#)  
[\[Link\]](#)

Inquiries regarding ERCB invoices and/or enforcement action reviews should be directed to the [WellTest-Helpline@ercb.ca](mailto:WellTest-Helpline@ercb.ca).

<b>ERCB Enforcement of Low Risk Noncompliance</b>	<b>Description</b>	<b>Implications</b>	<b>Approximate Period Between Actions</b>
<b>1st ERCB Notice</b>	Initial Pressure/Deliverability or Annual Pressure Survey invoice and 1st Notice letter addressed to the "Manager of Production Operations". Licensee must address the noncompliance event by the next ERCB monthly deadline date.	Failure to address the noncompliance event will result in 2nd ERCB Notice of Low Risk Noncompliance.	30 days
<b>2nd ERCB Notice</b>	A 2nd Notice addressed to the "VP of Operations". Licensee must address the noncompliance event by the next ERCB monthly deadline date.	Failure to address the noncompliance event or if the licensee is not actively working with the ERCB by the next ERCB monthly deadline date, Low Risk Enforcement will result.	14 days
<b>Low Risk Enforcement</b>	Low Risk enforcement letter addressed to the CEO/President. Licensee must address the noncompliance event by the next ERCB monthly deadline date and provide a written explanation acceptable to the Well Test Data Group addressing the failure to respond and detailing steps to prevent future occurrences.	Licensee must address the noncompliance event by the next ERCB monthly deadline date. Failure to address the noncompliance event or if the licensee is not actively working with the ERCB by the next ERCB monthly deadline date, additional Low Risk enforcement actions will result (escalation) and one or more of the following enforcement actions may occur: <ul style="list-style-type: none"> <li>• Noncompliance fees</li> <li>• Partial or full suspension</li> <li>• Suspension and/or cancellation of permit/license, or approval</li> <li>• Refer status: focused or global</li> </ul> *Senior ERCB personnel will meet with the licensee before enforcement actions are escalated.	14 days

Licensees may request an Enforcement Action Review from the Well Test Data Group at any step of this process.

Schedules for submission of Initial Pressure/Deliverability or Annual Pressure Surveys available on the ERCB web site: <http://www.ercb.ca>.