

***DIRECTIVE 59: WELL DRILLING AND COMPLETION DATA FILING REQUIREMENTS
FAQS***

COMPLIANCE ENFORCEMENT

Question: What are the details surrounding the compliance enforcement process for *Directive 059* and how does noncompliance with a requirement escalate?

Answer: The tables below outline how the ERCB communicates noncompliance with submission requirements for electronic drilling and completion data, hard copy daily reports of operations, and directional surveys to licensees.

Table 1. Noncompliance escalation for electronic drilling and completion data

Escalation	Type	Sent to	Allocated response time
1	Request for Information	Drilling Department	30 calendar days from date of the Request for Information
2	Notice of Low Risk Noncompliance	Manager, Drilling/Completion Department	30 calendar days from date of the Notice of Low Risk Noncompliance
3	Low Risk Enforcement Action	CEO	30 calendar days from date of the Low Risk Enforcement Action

Table 2. Noncompliance escalation for daily reports of operations (hard copy)

Escalation	Type	Sent to	Allocated response time
1	Request for Information	Submitter	15 calendar days from date of the Request for Information
2	Notice of Low Risk Noncompliance	Manager, Drilling/Completion Department	30 calendar days from date of the Notice of Low Risk Noncompliance
3	Low Risk Enforcement Action	CEO	30 calendar days from date of the Low Risk Enforcement Action

Table 3. Noncompliance escalation for directional survey reports

Escalation	Type	Sent to	Allocated response time
1	Request for Information	Drilling Department	30 calendar days from date of Request for Information
2	Notice of Low Risk Noncompliance	Manager, Drilling/Completion Department	30 calendar days from date of the Notice of Low Risk Noncompliance
3	Low Risk Enforcement Action	CEO	30 calendar days from date of the Low Risk Enforcement Action

Any further escalation beyond that of a Low Risk Enforcement Action is handled by ERCB Corporate Enforcement.

WELLS WITH MORE THAN 9 EVENT SEQUENCES

Question: Can data be submitted for well event sequences greater than 9?

Answer: No. Please refer to section 3.1.1 in Directive 059. "Licensees must also submit a DDS amendment with additional information stating the actual number of drill legs, which drill legs are reported and which are not."

DRILLING DATES

Question: What dates should be submitted for spud, finish drill and rig release for well operations?

Answer: See table below.

Type of Operation	Spud Date	Finish Drill Date (FDD)	Rig Release Date
Preset casing	Drilling of surface hole begins	N/A	N/A
Drilling to TD (/0 is preset)	N/A	When well reached TD	Rig is released from site
Drilling to TD for subsequent legs (/0 is preset)	Drilling operation starts	When well reached TD	Rig is released from site
Drilling to TD (not preset)	Drilling of surface hole begins	When well reached TD	Rig is released from site
Deepening	N/A	When well reached NEW TD	N/A
Re-entry (new licensee)	Re-entry operation starts	Re-entry operation ends	Rig is released from site
Resumption (existing licensee)	Resumption operation starts	Resumption operation ends	Rig is released from site

PRESET SURFACE CASINGS

Question: Are licensees required to submit drilling data for wells drilled prior to April 1, 2012, that had surface casing preset but have not been drilled to licensed total depth?

Answer: Yes. Licensees with wells drilled prior to April 1, 2012 that are preset but have not been drilled to licensed total depth must submit an electronic 'Preset' submission in DDS and hard copy daily reports of operations.

Licensees with wells that have been preset and subsequently abandoned as of April 1, 2012 must submit an electronic 'Drilling' submission in DDS and hard copy daily reports of operations. As well, surface abandonment records must be submitted, as per normal.

These reports must be submitted by July 1, 2012.

Question: How is the abandonment of a preset well submitted?

Answer: Licensees must submit drilling data when a preset well is subsequently abandoned without being drilled to licensed depth. The Contractor Code, Rig Number, Finish Drill Date and Rig Release Date will be of the original rig that preset the well. The Total Depth will be the shoe of the deepest casing. The Plugback Date will be the date the well is plugged.

MIXED CASING GRADE/DIAMETER/DENSITY

Question: How is casing data reported if there are 2 or more diameters, densities or casing grades in one string?

Answer: When there are 2 or more diameters and/or densities and/or casing grades, there should be 2 records of the casings submitted to represent the ranges of diameters, densities and/or grades, where applicable. One casing record may represent largest diameter, heaviest density and lowest grade and the other casing record may represent smallest diameter, lightest density and highest grade. The purpose of reporting it this way is to provide the ERCB with the range of these values. The depth of the shallower casing record may be the midpoint of the entire string and depth of the deeper casing record should be the shoe set depth of the entire string.

Do not submit a casing date on the shallower string so the system will not expect a cementing record. The deeper casing string should have the casing date and have the entire cementing record for the string.

THERMAL FOAM CEMENT (CEMENT CODE 35)

Question: Why is cement code 35 not available for selection in DDS?

Answer: If you have used thermal foam cement, please report using code 30 (Thermal cement) or code 36 (Foamed cement).

KICK OFF POINT

Question: If the inclination exceeds 5° in the vertical portion of a well and then corrects back to <5° for the remainder of the vertical section up until the "true" KOP Deviate, which point is considered the KOP Deviate? Do both need to be reported?

Answer: For wells that are licensed to be directional, slant or horizontal, if the inclination reaches 5° and then is reduced to <5° until the "true" "Deviate" KOP, please record the first instance only. The 5° point is a trigger for us to expect a directional survey as it is a requirement for wells with an inclination angle of 5° or greater. If a well is not classed as directional, slant or horizontal and reaches an inclination of 5° or greater due to drift and then returns to an inclination angle of <5°, a KOP is not required to be submitted.

PACKER OPERATION TYPE 'MODIFY'

Question: Under what scenario(s) can packer modify be used?

Answer: Starting April 1, 2012, existing packer data can be modified through an XML submission or a DDS online submission under the following scenarios:

- Change an existing packer type code of any packer observation
- Change an existing packer date as long as the new packer date is on or between the next shallowest and the next deepest packers where applicable
- Change an existing packer depth as long as the new packer depth is between the next shallowest and the next deepest packers where applicable.
- Changes can include packer type code, date and depth or any combination
- If a submission only includes a packer modification the operation start date and end dates should encompass the span of the dates for the packer to be modified. For example, if the packer to be modified has a date of Jan 15, 2001 and the new date is Mar 31, 2011 then the operation start date should be Jan 15, 2011 and end date should be Mar 31, 2011.
- If a submission only includes a packer modification a tour report is not required. However, industry will have to send an e-mail as a notification as there is no automated way of stopping the creation of a compliance notice.

When the new packer depth or date changes the sequencing of the packer observations, a Packer Operation 'P' (Pull) and 'S' (Set) must be submitted.

For additional information, please refer to the following link: < *Packer Modify Operation.doc* >

MORE THAN 99 OBSERVATIONS

Question: Can greater than 99 completion records be submitted per UWI?

Answer: Yes.

DIRECTIONAL SURVEYS

Question: Where can I find the standard Universal Transverse Mercator (UTM) algorithm the ERCB uses to convert geographic coordinates to projected coordinates and vice versa?

Answer:

The ERCB refers to *DMATM8358.1: Datums, Ellipsoids, Grids, and Grid Reference Systems* and *DMATM8358.2: The Universal Grids: Universal Transverse Mercator (UTM) and Universal Polar Stereographic (UPS)* from the United States Defense Mapping Agency for the conversions. Both documents are available on the National Geospatial-Intelligence Agency's Web site www.nga.mil under Products and Services > Geodesy and Geophysics.