



Directive 059: Well Drilling and Completion Data Filing Requirements

Summary of Stakeholder Feedback and ERCB Responses on the Revised Edition

| Issue | Stakeholder | ERCB Response | Status |
|-----------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| 1) Directive | | | |
| Number sections for reference. | Industry | Sections and requirements numbered. | Complete. Updated text in revised <i>Directive 059</i> . |
| Clearly define “must” and “should” statements. | Industry | “Must” statements have been identified as requirements and “should” statements minimized | Complete. Updated text in revised <i>Directive 059</i> . |
| Clarify the scope of the record of daily operations. | Industry | The record of daily operations must contain complete data on all operations carried out on the well. | Complete. Updated text in revised <i>Directive 059</i> . |
| Allow up to six months lead time before the directive is in effect. | Industry | Three months given. | The ERCB will respond to the individuals raising the issue. |
| 2) Tour Reports | | | |
| Does the signature requirement on the submission cover sheet contravene <i>FOIP</i> ? | Industry | The signature is a requirement of ERCB business operations permitted under the <i>Freedom of Information and Protection of Privacy Act (FOIPPA)</i> . | The ERCB will send a response to those persons raising the issue. |
| 3) Compliance Assurance | | | |
| Concerns raised over Notices of Low Risk Noncompliance being addressed to a company’s CEO rather than persons dealing with regulatory requirements. | Industry | Comment noted. | Not applicable. |

| Issue | Stakeholder | ERCB Response | Status |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|
| 4) Preset Surface Casing | | | |
| Will historical wells that have been preset but not yet drilled to licensed total depth need to be submitted? | Industry | Data related to historical wells that have been preset but not drilled to licensed total depth will have to be submitted by July 1, 2012. | Complete. Required in <i>Bulletin 2011-XX: Revised Edition of Directive 059: Well Drilling and Completion Data Filing Requirements</i> . |
| <p>Concerns:</p> <ul style="list-style-type: none"> • Will the total number of wells being assessed by Alberta Department of Energy (DOE) increase? • Will there be two spud dates? • What will the effect of having a spud date without drilling to licensed total depth be on royalty programs and the DOE's ability to determine whether a well qualifies or not? • Regarding the "PRESET" status, will communication of data between the ERCB and DOE systems be maintained? | Government | Meet again with the DOE to facilitate alignment of their business processes and systems with the preset surface casing requirements. | Future discussion between ERCB and DOE required. |
| Is a new spud date created when a preset well is drilled to total depth? | Industry | The spud date will not change after drilling to total depth. | The ERCB will send a response to those persons raising the issue. |
| 5) Deepening | | | |
| Different definitions of deepening between <i>Directive 056</i> and <i>Directive 059</i> . | Industry | No change at present. | Future discussion to align <i>Directive 056</i> and <i>Directive 059</i> required. |

| Issue | Stakeholder | ERCB Response | Status |
|---------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| 6) Ground Elevation | | | |
| ERCB collecting "As Planned" ground elevation prior to the well being drilled. However, this is usually different once the well is spudded. | Industry | "As built" ground elevation is currently being considered as a requirement for electronic daily operation reports. | Future discussion required. |
| 7) Operation Incident | | | |
| Can a code be added indicating that no incidents occurred during the operation? | Government | Code 99 added. Must be submitted electronically if no incidents occurred during an operation. | Complete. Code added. |
| What determines a loss of circulation? | Industry | If there is an indication of a loss of circulation then it must be reported electronically. | Complete. Updated text in revised <i>Directive 059</i> . |
| What defines "No incidents encountered"? | Industry | Needs to be used if there is no indication of an operation incident as defined on page 19 of the directive. | Complete. Updated text in revised <i>Directive 059</i> . |
| Incidents to be reported for all operations? | Industry | Licensees must include an operation incident record for all electronic <i>Directive 059</i> submissions. | Complete. Updated text in revised <i>Directive 059</i> . |
| A new operation incident code "Lost radioactive source" was requested. | Industry | Radioactive source losses are reported to the Canadian Nuclear Safety Commission. The licensee should also report the loss to the ERCB. | Complete. Response sent. |
| Is code 99 ("No incidents encountered") necessary? | Industry | For safety reasons, it is necessary to ensure that a record is kept regarding whether incidents were encountered or not. | The ERCB will send a response to those persons raising the issue. |

| Issue | Stakeholder | ERCB Response | Status |
|-----------------------------------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| 8) Multistage fracturing | | | |
| Is code 42 required if a liner has been run but ports are not open or fractured? | Industry | Code 42 is only required when ports are open or open and fractured. Otherwise, only a casing or liner record is required. | The ERCB will send a response to those persons raising the issue. |
| 9) Open Hole | | | |
| Is an open hole completion recorded if the casing/liner shoe is cemented but not drilled out? | Industry | Any uncemented gap between the last casing or liner shoe and total depth that can contribute to production is a reportable open hole section. | Complete. Updated text in revised <i>Directive 059</i> . |
| 10) Packer | | | |
| Restore packer codes 2 through 5 as these add to the overall picture of the wellbore. | Industry | Codes 2 through 5 have been restored. | Complete. Codes reinstated. |
| Should external casing packers be recorded? | Industry | Do not report external casing packers. However, if the packers are part of a completion assembly within a cased hole that allows different pools to be tested individually, then they must be recorded. | Complete. Updated text in revised <i>Directive 059</i> . |
| How do we report a change from a packer being open to one being closed? | Industry | Following a discussion with Well Operations, the proposed new packer codes 6 (packer [open]) and 7 (packer [closed]) have been removed as they cannot be considered packer types. The ERCB will review codes 6 and 7 and possibly reinstate them in the future. | The ERCB will send a response to those persons raising the issue. |
| 11) Directional Survey | | | |
| What constitutes an acceptable directional survey report? | Industry | Only final directional surveys that are approved by the licensee and incorporate data for the entire leg will be accepted. | Complete. Updated text in revised <i>Directive 059</i> . |

| Issue | Stakeholder | ERCB Response | Status |
|--------------------------------------------------------------------------------------------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|
| What requirements exist for directional surveys on wells that have been deepened? | Industry | If additional drilling is less than 150 metres (m) and no directional survey was run, submit the original directional survey including the extrapolation to the new total depth. | Complete. Updated text in revised <i>Directive 059</i> . |
| The inclusion of kelly bushing elevation as a directional survey requirement is confusing. | Industry | The kelly bushing must be recorded as a point, vertex, or station and should be the origin of the survey. For wells other than slant wells, this should be 0.00 m (North-South) and 0.00 m (East-West). For slant wells, this should reflect the offsets between the kelly bushing and where the wellbore is located at ground surface. | Complete. Updated text in revised <i>Directive 059</i> . |
| What is the submission deadline for a directional survey? | Industry | <i>Directive 059</i> stipulates 30 days from the finished drilling date. <i>Oil and Gas Conservation Regulations</i> indicate “immediately” after completing the directional survey. | The ERCB will send a response to those persons raising the issue. |
| 12) Gross Completion Interval | | | |
| How are GCIs reported on multileg wells? | Industry | Drain legs can now have a GCI assigned to them | Complete. Updated text in revised <i>Directive 059</i> . |
| Has the revised GCI review process been described? | Industry | A new section in Appendix 1 describes the revised GCI review process. | Complete. Updated text in revised <i>Directive 059</i> . |
| When are GCIs recorded if an operation includes multiple stages? | Industry | Update the GCI at the end of a particular operation if it has changed. | The ERCB will send a response to those persons raising the issue. |
| 13) Well Event Sequences | | | |
| Add text on uncased wells with no hydrocarbon potential not being classed as a well. | Industry | A well that is uncased and uncemented, does not encounter hydrocarbons, does not reach the intended zone of hydrocarbon potential, and is less than 150 m is not considered a well. | Complete. Updated text in revised <i>Directive 059</i> . |

| Issue | Stakeholder | ERCB Response | Status |
|------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Clarify the definition of ghost hole. | Industry | Ghost holes are not considered events and do not require an event sequence unless a directional survey has been run, cores have been cut, and logs or drill stem tests run. | Complete. Updated text in revised <i>Directive 059</i> . |
| How are well event sequences assigned for commingled wells? | Industry | If in the same wellbore that has commingled production, a new event sequence must be created for a new completion operation in a pool not identified by the ERCB as belonging to Development Entity No. 1, Development Entity No. 2, or self-declared commingling pools. | Complete. Updated text in revised <i>Directive 059</i> . |
| Industry is concerned that they are unable to report more than 9 event sequences. DOE's concern is that they may be missing production. | Industry | This issue is under investigation. | Future discussion required. |
| 14) Casing | | | |
| What are the reporting requirements for conductor casing? | Industry | Reporting conductor casing is optional unless surface casing is not present or conductor casing is run to a depth of 30 m or deeper. The casing record must include density, grade, and cementing details. | Complete. Updated text in revised <i>Directive 059</i> . |
| Explain the reporting of a liner for multistage fracture completion. | Industry | If the liner for a multistage fracture is run then a casing code 5 is required. If a liner is run but the ports remain closed, then a code 42 completion is not required until the ports are opened or opened and fractured. | Complete. Updated text in revised <i>Directive 059</i> . |
| 15) Cementing | | | |
| How is the cementing recorded on a casing string with mixed density and/or grade? | Industry | For mixed casing strings, record the cementing details on the deepest casing substring. | Complete. Updated text in revised <i>Directive 059</i> . |
| 16) Ghost Holes | | | |
| A well event with a directional survey should not be considered a ghost hole. | Industry | Directional survey added as a criterion to establish whether a wellbore is a ghost hole or not. | Complete. Updated text in revised <i>Directive 059</i> . |

| Issue | Stakeholder | ERCB Response | Status |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------|
| Should ghost holes be reported in the ERCB's Digital Data System? | Industry | No data submission is required for ghost holes. | Complete. Updated text in revised <i>Directive 059</i> . |
| 17) Resumptions/re-entries | | | |
| There should be a status for wells that have been downhole and surface abandoned and another for wells that have only been downhole abandoned. | Industry | May have new status in the future. Major alignment would be required for historical wells. | Future discussion required. |
| 18) Abandonment | | | |
| Clarify the "Abandoned" non-initial status. | Industry | A well that has been drilled and had some other well operation performed (i.e., production, injection, testing) and then subsequently abandoned downhole and at surface. | Completed - Updated text in revised <i>Directive 059</i> . |
| 19) Appendix 2 | | | |
| Assign the location exception in the order that wells are licensed rather than the order in which the wells are actually drilled. | Industry | This was an ERCB decision. As a result, unique well identifiers (UWI) are not re-assigned after licensing. | Complete. Updated text in revised <i>Directive 059</i> . |
| Are quadrants still assigned for new wells as part of the UWI? | Industry | Quadrants only exist for historical wells and are no longer assigned as part of a new UWI. | Complete. Updated text in revised <i>Directive 059</i> . |
| Assigning the prefixes "S" and "W" for wells that bottom hole in road allowances may lead to misinterpretation of the licence and result in an incorrect trespassing penalty. | Industry | This is currently being discussed as part of the Bottom and Surface Hole Integrity Project (BSHIP). | Future discussion required. |
| The well name for a multileg well sometimes reflects the UWI of the "Abandoned and whipstocked" (ABDWHP) leg and not the actively producing leg. This occurs when the UWI for the abandoned and whipstocked leg is amended last, the UWI of the well name is changed to reflect the abandoned and whipstocked leg. | Industry | This issue is under investigation. | Future discussion required. |

