



ERCB Monthly Enforcement Action Summary

January 2009

ENERGY RESOURCES CONSERVATION BOARD
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High Risk Compliance Category Statistics				
ERCB	Compliance Category	January 2009		
		Initial Audits/ Inspections	Number of High Risk Noncompliance	Compliance Rate with High Risk Noncompliance
Applications Branch				
Facilities Applications Group Audit Section	Participant Involvement	68	3	96%
	Facilities Technical	20	0	100%
	Pipelines/Pipeline Installations Technical	67	0	100%
	Wells Technical	49	6	88%
Resources Applications Group Enforcement & Surveillance Section and Coal Section	Production Without Common Ownership	N/A	1	N/A
	Groundwater Protection	N/A	6	N/A
	Control Wells	N/A	3	N/A
	Spacing	N/A	3	N/A
Subtotal		204	22	89%
Compliance and Operations Branch				
Environment Group Waste and Storage Section	Oilfield Waste Generator	6	1	83%
	Drilling Waste Audits	2	1	50%
Operations Group	Sulphur Recovery Guidelines	100	1	99.0%
Subtotal		108	3	97%
Public Safety/Field Surveillance Branch				
	Drilling Operations	64	3	95%
	Well Servicing	42	0	100%
	Oil Facilities	372	11	97%
	Gas Facilities	369	10	97%
	Pipelines	258	10	96%
	Drilling Waste	25	1	96%
	Well Site Inspections	594	5	99.1%
	Waste Management	6	1	83%
Subtotal		1730	41	97.6%
Resources Branch				
Geology and Reserves Group Reserves & Allowables Section	Oil Overproduction	501	4	99.2%
Subtotal		501	4	99.2%
Total Audit/Inspections High Risk		2543	70	97.2%

Note: Compliance category data are evaluated annually and results presented in *ST99 ERCB Provincial Surveillance and Compliance Summary*.

High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	Action Energy Inc.	Field Surveillance/ Pipelines	Emergency Procedures Manual - No approved site-specific emergency response plan (ERP) where required.	January 8, 2009	14-22-079-09W6 Saddle Hills County	Operations were not suspended, as the noncompliance was rectified in a short timeframe and mitigative measures were put into place. Licensee implemented an emergency response plan. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
2	AltaGas Ltd.	Operations Group/ Sulphur Recovery Guidelines	Failure to meet the approved calendar quarter-year sulphur recovery guidelines.	January 30, 2009	12-24-110-08W6 Mackenzie County	In accordance with <i>ID 2001-03 (Sulphur Recovery Guidelines for the Province of Alberta)</i> , operations were not suspended. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
3	Amethyst Petroleums Ltd.	Field Surveillance/ Gas Facilities	H ₂ S emissions off lease (identify source and cause).	January 30, 2009	03-28-048-25W4 Leduc County	Operations suspended. Licensee repaired the leak that was the source of the odours. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
4	Anderson Energy Ltd.	Facilities Applications/ Wells Technical	Failure to acquire the necessary well licence prior to commencing site preparation, construction and/or operation.	January 20, 2009	06-13-039-05W5 Clearwater County	Licence(s) not cancelled or suspended, as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
5	Apache Canada Ltd.	Facilities Applications/ Participant Involvement	Filing the application before expiry of the 14-calendar-day notification period.	January 8, 2009	13-33-039-23W4 Lacombe County	Licence(s) not cancelled or suspended, as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
6	Apache Canada Ltd.	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	01-27-032-26W4 Mountain View County 04-26-037-19W4 08-26-037-19W4 County of Stettler 07-23-042-21W4 Camrose County 07-10-043-22W4 Ponoka County	Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i> . Licensee determined the source and composition of the produced water and provided a water analysis. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
7	Apache Canada Ltd.	Resources Applications/ Spacing	Production of too many wells per pool per drilling spacing unit without approval.	January 16, 2009	12-27-069-11W5 14-27-069-11W5 M.D. of Big Lakes	<p>Licensee confirmed in writing that the noncompliance has been addressed and that the well has been shut in and will remain shut in until the requisite approval has been obtained.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
8	ARC Resources Ltd.	Field Surveillance/ Well Site Inspection	Noncompliant with other ERCB requirement – exceeding oil and gas well test flaring/ incinerating and venting duration limits without approval as per <i>Directive 060: Upstream Petroleum Industry Flaring Requirements</i> .	January 5, 2009	01-18-080-12W6 Saddle Hills County	<p>Operations were not suspended, as the incident occurred prior to the inspection.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
9	ARC Resources Ltd.	Field Surveillance/ Oil Facilities	Underground tank(s) not tested at the required 3-year frequency/operator cannot demonstrate tank integrity.	January 28, 2009	06-22-034-03W5 Red Deer County	<p>Operations were not suspended, as the tank will be emptied daily until integrity testing can be completed.</p> <p>Licensee integrity tested the tank(s).</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
10	ARC Resources Ltd.	Geology and Reserves/ Oil Overproduction	Failure to retire oil overproduction.	January 29, 2009	15-12-075-09W6 County of Grande Prairie	Operations suspended. Licensee confirmed that the well has been shut in and will remain shut in until all overproduction has been retired. Licensee was directed to develop and implement a plan to address the noncompliance and prevent future occurrences. All overproduction retired. Compliance achieved.
11	Arsenal Energy Inc.	Geology and Reserves/ Oil Overproduction	Failure to retire oil overproduction.	January 29, 2009	05-33-033-08W4 Special Area 4 (near Veteran)	Operations suspended. Licensee confirmed that the well has been shut in and will remain shut in until all overproduction has been retired. Licensee was directed to develop and implement a plan to address the noncompliance and prevent future occurrences. All overproduction retired. Compliance achieved.
12	Auriga Energy Inc.	Field Surveillance/ Pipelines	Poor construction practices resulting in failure within one year's service/operation.	January 14, 2009	10-29-060-21W5 M.D. of Greenview	Operations suspended. Licensee repaired the pipeline. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
13	Bonavista Petroleum Ltd.	Field Surveillance/ Well Site Inspection	Surface casing vent flow gas with liquids.	January 27, 2009	13-35-033-05W5 Mountain View County	Operations were not suspended, as plugging off the vent may result in gas migration. Require a plan to address the noncompliance and prevent future occurrences. Compliance not yet achieved.
14	BP Canada Energy Company	Field Surveillance/ Pipelines	Depth of cover is unsatisfactory.	January 28, 2009	10-11-033-04W5 Mountain View County	Operations were not suspended, as there would have been an increased risk to public safety. Licensee provided a plan to address the noncompliance and prevent future occurrences. Depth of cover was replaced to a satisfactory level. A layer of in-erodible/stable armour was constructed over the pipeline to protect it from the risk of scour. Compliance achieved.
15	BP Canada Energy Company	Field Surveillance/ Pipelines	Depth of cover is unsatisfactory.	January 28, 2009	09-16-026-04W5 M.D. of Rocky View	Operations were not suspended, as there would have been an increased risk to public safety. Licensee provided a plan to address the noncompliance and prevent future occurrences. Depth of cover was replaced to a satisfactory level. A layer of in-erodible/stable armour was constructed over the pipeline to protect it from the risk of scour. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
16	Caltex Energy Inc.	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	06-35-062-14W5 Woodlands County	<p>Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i>.</p> <p>Licensee determined the source and composition of the produced water and provided a water analysis.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
17	Canadian Natural Resources Limited	Field Surveillance/ Oil Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 5, 2009	16-08-014-15W4 County of Newell	<p>Operations were not suspended, as the noncompliance was corrected promptly.</p> <p>Licensee installed nuts/bolts on the flame arrester.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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18	Canadian Natural Resources Limited	Field Surveillance/ Oil Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 8, 2009	08-23-026-20W4 Wheatland County	Operations were not suspended, as the noncompliance was promptly corrected. Licensee installed nuts/bolts on the flame arrester. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
19	Canadian Natural Resources Limited	Field Surveillance/ Gas Facilities	No tank dike where required. Release criteria in <i>Directive 055/Directive 058</i> not met prior to release. Noncompliant with other ERCB requirement – Production of more than 5 tonnes/year for a dehydrator installed prior to January 1, 1999, and greater than 750 m to permanent resident or public facility.	January 12, 2009	13-26-067-05W6 M.D. of Greenview	Operations were not suspended, as steps have been taken to mitigate the risk to public safety and the environment. Tank dike – mitigated. Release criteria – past event. Dehydrator vent has been routed to the flare system. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
20	Canflame Energy Ltd.	Geology and Reserves/ Oil Overproduction	Failure to retire oil overproduction.	January 12, 2009	08-32-049-26W4 Leduc County	<p>Operations suspended.</p> <p>Licensee confirmed that the well has been shut in and will remain shut in until all overproduction has been retired.</p> <p>Licensee was directed to develop and implement a plan to address the noncompliance and prevent future occurrences.</p> <p>Three requests for waiver of overproduction denied.</p>
21	Cansearch Resources Ltd.	Facilities Applications/ Wells Technical	Failure to acquire a mineral lease continuation – No agreement with Department of Energy.	January 29, 2009	08-29-038-25W4 Lacombe County	<p>Licence(s) suspended.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
22	Caymen Energy Inc.	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	11-03-075-13-W4 Lac La Biche County	<p>Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i>.</p> <p>Licensee determined the source and composition of the produced water and provided a water analysis.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
23	City of Medicine Hat	Environment Group/ Drilling Waste Audits	Sump closure was not completed within 12 months of drilling rig release.	January 7, 2009	06-14-018-18W4 Vulcan County	Operations were not suspended, as there was no existing or potential impact/hazard to the environment or the public. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance not yet achieved.
24	Concerto Resources Ltd.	Field Surveillance/ Well Site Inspection	Pumping well within 800 m of public development and does not have a fence as per OGC Regulations, Section 8.180(2).	January 6, 2009	16-12-026-03W5 M.D. of Rocky View	Operations suspended. Licensee installed fencing around the well and pumpjack. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
25	ConocoPhillips Canada (BRC) Ltd.	Field Surveillance/ Gas Facilities	H ₂ S emissions off lease (identify source and cause).	January 3, 2009	06-28-046-13W5 Yellowhead County	Operations suspended. Licensee insulated the piping and vent controller to prevent the line from freezing. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
26	ConocoPhillips Canada (BRC) Ltd.	Field Surveillance/ Gas Facilities	Spill on/off lease not adequately controlled/ cleaned up.	January 19, 2009	16-34-047-14W5 Yellowhead County	Operations were not suspended, as there was no existing or potential impact/hazard to the environment or the public. Require a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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27	Delphi Energy Corp.	Field Surveillance/ Oil Facilities	H ₂ S emissions off lease (identify source and cause).	January 23, 2009	04-32-038-06W4 M.D. of Provost	Operations suspended. Licensee installed a pressure monitoring check valve. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
28	EnCana Corporation	Facilities Applications/ Participant Involvement	Failure to disclose to the ERCB any outstanding public/industry objections/concerns, whether they are received prior to or after filing of the application or whether the party is inside or outside the minimum contact radius of personal consultation and notification.	January 6, 2009	14-21-026-22W4 Wheatland County	Application(s) withdrawn/ closed prior to issuance of disposition. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
29	EnCana Corporation	Field Surveillance/ Gas Facilities	Flare gas/acid gas/ vented gas - no acid gas measurement, or total acid gas not measured.	January 6, 2009	01-18-001-08W4 County of Forty Mile	Operations were not suspended, as there was no existing or potential impact/hazard to the environment or the public. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
30	EnCana Corporation	Resources Applications/ Control Wells	Producing wells without the requisite control wells in place.	January 16, 2009	03-02-027-27W4 M.D. of Rockyview	Operations suspended. Licensee confirmed in writing that the noncompliance has been addressed and that the well has been shut in and will remain shut in. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
31	EnCana FCCL Oil Sands Ltd.	Facilities Applications/ Wells Technical	Failure to acquire the rights to the intended formation(s).	January 21, 2009	01-19-076-05W4 10-13-076-05W4 07-14-076-05W4 02-15-076-05W4 15-18-076-05W4 Regional Municipality of Wood Buffalo	Licence(s) not cancelled or suspended, as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
32	Enermark Inc.	Field Surveillance/ Oil Facilities	H ₂ S emissions off lease.	January 14, 2009	13-23-040-08W4 M.D. of Provost	Operations were not suspended, as the noncompliance was promptly corrected. Licensee installed the thief hatch seals with proper temperature ratings. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
33	Enermark Inc.	Resources Applications/ Spacing	Failure to apply to rescind or vary the area of a Holding/ Block/ Project when common ownership is no longer in place.	January 8, 2009	33-032-11W4 Special Area 2 (near Richdale)	<p>Licensee confirmed that all Second White Speckled Shale producers in the holding area have been shut in and will remain shut in until the requisite approval has been obtained.</p> <p>Licensee submitted a plan to address the noncompliance and prevent future occurrences.</p> <p>Licensee submitted an application to rescind the holding, confirming that there were no future plans with respect to production of the Second White Speckled Shale from the holding.</p> <p>Compliance achieved.</p>
34	Enterra Energy Corp.	Field Surveillance/ Well Site Inspection	H ₂ S emissions off lease.	January 13, 2009	03-10-040-13W4 Flagstaff County	<p>Operations suspended.</p> <p>Licensee repaired the wellhead packing.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
35	EOG Resources Canada Inc.	Resources Applications/ Control Wells	Producing wells without the requisite control wells in place.	January 16, 2009	07-06-031-25W4 Kneehill County	<p>Operations suspended.</p> <p>Licensee confirmed in writing that the noncompliance has been addressed and that the well has been shut in and will remain shut in.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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36	Fairborne Energy Ltd.	Facilities Applications/ Wells Technical	Failure to acquire a mineral lease continuation - No agreement with Department of Energy.	January 16, 2009	14-34-044-15W5 Clearwater County	Licence(s) not cancelled or suspended, as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
37	Forent Energy Ltd.	Field Surveillance/ Gas Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 23, 2009	07-17-035-24W4 Red Deer County	Operations were not suspended, as the noncompliance was corrected at the time of inspection. Licensee installed nuts/bolts on the flame arrester. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
38	Galleon Energy Inc.	Field Surveillance/ Pipelines	Corrosion Internal - There is no documented monitoring or mitigation program in place and/or company is not following program.	January 14, 2009	06-03-078-21W5 M.D. of Smoky River	Operations suspended. Licensee implemented a corrosion control program. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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39	Galleon Energy Inc.	Field Surveillance/ Gas Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 30, 2009	05-26-077-15W5 M.D. of Lesser Slave River	Operations were not suspended, as the noncompliance was corrected at the time of inspection. Missing wing nuts on glycol dehydrator flame inspection cover were installed. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
40	Gentry Resources Ltd.	Geology and Reserves/ Oil Overproduction	Failure to retire oil overproduction.	January 12, 2009	11-04-017-11W4 County of Newell	Operations suspended. Licensee confirmed that the well was shut in in December 2008 and all overproduction was retired by December 31, 2008. Licensee was directed to develop and implement a plan to address the noncompliance and prevent future occurrences. All overproduction retired. Compliance achieved.
41	Harvest Operations Corp.	Field Surveillance/ Oil Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 6, 2009	09-01-024-24W4 Wheatland County	Operations were not suspended, as the noncompliance was promptly corrected. Licensee installed nuts/bolts on the flame arrester. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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42	Harvest Operations Corp.	Field Surveillance/ Pipelines	Poor construction practices resulting in failure within one year's service/operation.	January 8, 2009	11-05-087-13W5 Northern Sunrise County	Operations suspended. Licensee repaired the pipeline. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
43	Highbine Energy Ltd.	Field Surveillance/ Drilling Waste Inspection	Noncompliant with other ERCB requirement - All appropriate waste sampling, preparation and testing not conducted according to requirements as per Section 4.3 of <i>Directive 050</i> & Section 8.151(4) of the Oil and Gas Conservation Regulations.	January 25, 2009	12-35-050-06W5 Brazeau County	Operations were not suspended, as the land spray during drilling operations had already been completed. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
44	Husky Oil Operations Limited	Field Surveillance/ Well Site Inspection	Noncompliant with other ERCB requirement - Underground tank(s) not integrity tested at the required three-year frequency as defined in <i>Directive 064</i> , Appendix 1, Section 12.G.38	January 10, 2009	01-01-050-07W5 Brazeau County	Operations were not suspended, as there was no existing or potential impact/hazard to the environment or the public. Licensee integrity tested the tank(s). Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
45	Husky Oil Operations Limited	Field Surveillance/ Drilling Inspection	Maximum allowable casing pressure not posted in the manifold shack and/or the remote chock location.	January 14, 2009	13-20-048-04W4 County of Vermilion River	Operations were not suspended, as the noncompliance was promptly corrected. Licensee posted the chart in the manifold shack. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
46	JED Production Inc.	Field Surveillance/ Pipelines	External corrosion control/cathodic surveys - no records of survey results. Pipeline sign missing or defaced on both sides of a crossing. Pressure Control Devices or Pressure Relief Devices - Required function tests not conducted or recorded.	January 22, 2009	11-22-117-02W6 Mackenzie County	Operations were not suspended, as there would have been an increased risk to public safety. Licensee completed a cathodic protection survey. Licensee replaced the pipeline sign(s). Licensee completed function tests on all devices. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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47	Madison Energy Corp.	Field Surveillance/ Oil Facilities	Spill on/off lease not adequately controlled/cleaned up.	January 28, 2009	09-24-034-04W5 Mountain View County	Operations were not suspended, as there was no existing or potential impact/hazard to the environment or the public since the spill had stopped and normal operations had resumed. Licensee cleaned up the spill. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
48	Mancal Energy Inc.	Facilities Applications/ Wells Technical	Failure to acquire a mineral lease continuation – No agreement with Department of Energy	January 9, 2009	13-36-048-12W5 Yellowhead County	Licence(s) cancelled. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
49	Meg Energy Corp.	Facilities Applications/ Wells Technical	Failure to acquire the rights to the intended formation(s).	January 14, 2009	08-04-077-05W4 Regional Municipality of Wood Buffalo	Licence(s) cancelled. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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50	Midlake Oil & Gas Limited	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	08-36-029-09W4 Special Area 3 (near Youngstown)	<p>Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i>.</p> <p>Licensee determined the source and composition of the produced water and provided a water analysis.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
51	NAL Resources Limited	Field Surveillance/ Well Site Inspection	Pumping well within 800 m of public development and does not have a fence as per OGC Regulations, Section 8.180(2).	January 28, 2009	06-06-034-03W5 Red Deer County	<p>Operations suspended.</p> <p>Licensee installed fencing around the well.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
52	Nuvista Energy Ltd.	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	05-06-029-04W4 Special Area 3 (near Cereal)	<p>Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i>.</p> <p>Licensee determined the source and composition of the produced water and provided a water analysis.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
53	Open Range Energy Corp.	Facilities Applications/ Participant Involvement	Incomplete public and/or industry personal consultation and notification prior to filing the application.	January 21, 2009	06-22-054-20W5 Yellowhead County	<p>Licence(s) not cancelled or suspended, as the noncompliance was promptly corrected.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
54	Paramount Energy Operating Corp.	Field Surveillance/ Gas Facilities	Newly installed tank(s) and associated piping not tested prior to service.	January 26, 2009	04-27-050-09W4 County of Minburn	<p>Operations suspended.</p> <p>Licensee tested the tanks and associated piping.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
55	Penn West Petroleum Ltd.	Environment Group/ Oilfield Waste Generator Audits	Oilfield waste was transferred to an unapproved storage/ transfer station.	January 28, 2009	12-36-018-20W4 Vulcan County	Suspension of operations at this time was not deemed appropriate, as disposal operations were completed in 2006. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
56	Penn West Petroleum Ltd.	Field Surveillance/ Drilling Inspection	Valve next to the drilling spool/BOP outlet in the open position. Accumulator pressure dropped below 8400 kPa after function test with the recharge pump off.	January 30, 2009	12-23-038-08W5 Clearwater County	Operations suspended. Licensee repaired the valve. Licensee repaired the accumulator pipe ram to allow for proper function testing. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
57	Penn West Petroleum Ltd.	Resources Applications/ Spacing	Producing wells contravene approved interwell and buffer zone limitations. Failure to apply to rescind or vary the area of a holding when common ownership is no longer in place.	January 30, 2009	82 sections in 043-07W4, 044-07W4 and 044-08W4 M.D. of Wainwright	Viking production not shut in, as compliance was promptly restored with the approval of an application to rescind the holding in its entirety. Licensee provided documentation that common ownership as defined in Section 1.020(2)(4) of the <i>Oil and Gas Conservation Regulations</i> is in place for the remaining holding lands. Licensee submitted a plan to address the noncompliance and prevent future occurrences. Licensee chose to commence a self-audit of all its holdings to ensure compliance. Compliance achieved.
58	Petroglobe Inc.	Resources Applications/ Groundwater Protection	Failure to immediately notify the ERCB of water production above the threshold.	January 16, 2009	14-12-048-03W5 Leduc County 06-26-049-09W5 14-17-049-10W5 Brazeau County	Operations were not suspended, in accordance with <i>Directive 044: Requirements for the Surveillance, Sampling, and Analysis of Water Production in Oil and Gas Wells Completed Above the Base of Groundwater Protection</i> . Licensee determined the source and composition of the produced water and provided a water analysis. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
59	Progress Energy Ltd.	Field Surveillance/ Pipelines	Substance is different from that stated on licence and the line is operating.	January 28, 2009	13-14-068-06W6 M.D. of Greenview	Operations suspended. Licensee submitted an application to correct the substance status. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
60	Provident Energy Ltd.	Field Surveillance/ Pipelines	Corrosion Internal - There is no documented monitoring or mitigation program in place and/or company is not following program. Inappropriate construction or design, or documented operating procedures not followed.	January 6, 2009	09-34-049-01W4 County of Vermilion River	Operations suspended. Licensee implemented a corrosion control program. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
61	Quicksilver Resources Canada Inc.	Resources Applications/ Control Wells	Producing wells without the requisite control wells in place.	January 16, 2009	07-27-044-22W4 County of Wetaskiwin 14-32-034-27W4 08-04-035-27W4 06-32-034-27W4 14-04-035-27W4 14-06-036-27W4 Red Deer County	Operations suspended. Licensee confirmed in writing that the noncompliance has been addressed and that the well has been shut in and will remain shut in. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
62	Signalta Resources Limited	Field Surveillance/ Gas Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 26, 2009	08-01-049-14W4 County of Minburn	Operations were not suspended, as the noncompliance was corrected at the time of inspection. Licensee installed nuts/bolts on the flame arrester. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
63	Taqa North Ltd.	Field Surveillance/ Oil Facilities	H ₂ S emissions off lease (identify source and cause).	January 15, 2009	14-09-013-14W4 M.D. of Taber	Operations were not suspended, as the noncompliance was promptly corrected. Licensee repaired the thief hatch that was the source of the odours. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
64	Taqa North Ltd.	Field Surveillance/ Drilling Inspection	Flexible hose used in bleed-off, kill or diverter line(s) (within 7 m of wellbore) does not have adequate fire sheathing. Blowout preventer floor controls not provided for each blowout preventer component and the HCR in the diverter/bleed-off line.	January 16, 2009	09-02-030-28W4 Mountain View County	Operations suspended. Licensee removed the hose from service. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
65	Taqa North Ltd.	Field Surveillance/ Gas Facilities	H ₂ S emissions off lease (identify source and cause).	January 16, 2009	09-14-028-01W5 M.D. of Rocky View	<p>Operations were not suspended, as the noncompliance was promptly corrected.</p> <p>Licensee has changed internal procedures to ensure that only degassed sulphur will be transported via railcar and that the rail cars were loaded and sealed properly.</p> <p>Licensee has implemented new operating procedures designed to mitigate any potential source of fugitive emissions that need to be captured and treated.</p> <p>Pressure relief devices on sour storage tanks were rebuilt or replaced.</p> <p>H₂S detector and secondary pressure transmitter were installed on top of the most active production tank.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
66	Tristar Oil & Gas Ltd.	Field Surveillance/ Oil Facilities	H ₂ S emissions off lease (identify source and cause).	January 20, 2009	14-11-013-15W4 M.D. of Taber	<p>Operations suspended.</p> <p>Licensee installed sulfa treat barrels on the vent lines.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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High Risk Enforcement Action 1 ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
67	Zapata Energy Corporation	Field Surveillance/ Oil Facilities	Flame-type equipment without workable flame arrester less than 25 m from a process vessel.	January 30, 2009	08-22-027-02W4 Special Area 3 (near Sibbald)	Operations were not suspended, as the noncompliance was corrected at the time of inspection. Licensee installed nuts/bolts on the flame arrester. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

High Risk Enforcement Action 2 (Persistent Noncompliance) ²						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	Penn West Petroleum Ltd.	Field Surveillance/ Pipelines	Corrosion Internal - There is no monitoring or mitigation program in place for pipelines with major potential public and environmental consequences.	January 27, 2009	01-06-052-26W4 Parkland County	Operations suspended. Licensee implemented a corrosion control program. Licensee provided a plan to address the noncompliance and prevent future occurrences. Licensee met with the ERCB to review its action plan. Compliance achieved.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

High Risk Enforcement Action 3 (Failure to Comply or Demonstrated Disregard) ³						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	None					

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Low Risk Enforcement Action – Global REFER Summary⁴

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
1	County Line Energy (Canada) Inc.	Corporate Compliance/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	January 5, 2009	10-08-040-01W4 M.D. of Provost	<p>This is an escalation from previous enforcement actions reported on October 28, 2008, and November 20, 2008.</p> <p>Global Refer status.</p> <p>Issuance of Abandonment Order No. AD 2009-01.</p> <p>Abandonment of well licence.</p> <p>Licensee required to abandon the well or pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</p> <p>County Line Energy (Canada) Inc. submitted the full security amount and provided a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</p> <p>Compliance achieved.</p>

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Low Risk Enforcement Action – Global REFER Summary⁴

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
2	Devexco Resources Ltd.	Corporate Compliance/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	January 21, 2009	Well Licences: 01-06-045-04W4 09-06-045-04W4 08-06-045-04W4 M.D. of Wainwright 03-07-057-01W5 06-07-057-01W5 County of Barrhead 02-13-029-02W5 Mountain View County Facility Licence: 00/03-07-057-01W5 County of Barrhead	This is an escalation from a previous enforcement action initially reported on December 30, 2008. Global Refer status. Issuance of Closure Orders No. C 1140 and C 1141. Suspension of well and facility licences. Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences; senior Devexco representatives with provincial authority must meet with the ERCB to review Devexco Resources Ltd.'s noncompliant history and corrective action plan. Devexco Resources Ltd. failed to comply. Abandonment Orders No. AD 2009-7, AD 2009-8, AD 2009- 8A, AD 2009-8B, AD 2009-9, AD 2009-10, and AD 2009-12 were subsequently issued. Devexco Resources Ltd. successfully transferred three well licences to an eligible licensee, fully secured its post-transfer LLR, provided a written explanation addressing the failure to respond and detailing steps to prevent future occurrences, and met with the ERCB's Enforcement Section

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Low Risk Enforcement Action – Global REFER Summary⁴

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
						to review Devexco Resources Ltd.'s noncompliant history and corrective action plan. Compliance achieved.
3	Magnus One Energy Corp.	Corporate Compliance/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	January 14, 2009	N/A – Against licensee	Global Refer status. Issuance of Miscellaneous Order No. MISC 2009-02. Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences. Magnus One Energy Corp. failed to comply. Closure Orders No. C 1144 and C 1145 and Abandonment Orders No. AD 2009-14, AD 2009-15, and AD 2009-16, and Closure/Abandonment Order AD 2009-17 were subsequently issued. A working interest participant satisfactorily abandoned the well licence associated with Abandonment Order No. AD 2009-14. The ERCB notified Magnus One Energy Corp. of its intention to have the remaining properties abandoned as a result of the breaching of abandonment orders.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Low Risk Enforcement Action – Global REFER Summary⁴

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
4	Peace West Energy Corporation	Corporate Compliance/ Orphan Levy	Failure to pay 2008 Orphan Fund Levy, plus 20% penalty.	January 29, 2009	01-13-108-19W5 01-18-109-19W5 02-06-109-19W5 13-21-109-19W5 15-31-108-19W5 08-24-108-19W5 01-25-108-19W5 15-33-108-19W5 Mackenzie County 07-24-073-10W5 05-26-073-10W5 M.D. of Big Lakes	<p>This is an escalation from a previous enforcement action initially reported on December 17, 2008.</p> <p>Global Refer status.</p> <p>Issuance of Closure/Abandonment Order No. AD 2009-02.</p> <p>Suspension and abandonment of all well licences.</p> <p>Licensee required to pay the 2008 Orphan Fund Levy plus 20% penalty and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences; senior Peace West representatives with provincial authority must meet with the ERCB to review Peace West Energy Corporation's noncompliant history and corrective action plan.</p> <p>Peace West Energy Corporation failed to comply. As prior notice was provided respecting the ERCB's intention to have the properties abandoned and the ERCB is in the process of abandoning the properties, renounce was not issued.</p>

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Low Risk Enforcement Action – Global REFER Summary⁴

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
5	Slate Energy Inc.	Corporate Compliance/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	January 21, 2009	Well Licences: 06-34-055-24W4 03-34-055-24W4 03-34-055-24W4 11-34-055-24W4 Facility Licence: 00/06-34-055-24W4 Sturgeon County	This is an escalation from a previous enforcement action initially reported on December 30, 2008. Global Refer status. Issuance of Closure Orders No. C1138 and C 1139. Suspension of well and facility licences. Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences; senior Slate representatives with provincial authority must meet with the ERCB to review Slate Energy Inc.'s noncompliant history and corrective action plan. Slate Energy Inc. submitted payment of the security deposit in full; however, the written action plan and meeting with the ERCB remain outstanding.

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Legislative/Regulatory Enforcement Action ⁵						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow up
1	Apache Canada Ltd.	Corporate Compliance/ Petroleum and Natural Gas Rights Expiry	Failure to prove to the satisfaction of the ERCB that Apache Canada Ltd. has a valid entitlement to the right to produce the well.	January 15, 2009	03-26-064-18W4 County of Athabasca	<p>Global Refer status.</p> <p>Issuance of Closure Order No.: C 1137.</p> <p>Suspension of well licence.</p> <p>Licensee required to abandon the 03-26-064-18W4 well; complete the Digital Data Submission indicating both the downhole and surface abandonment; provide a written action plan acceptable to the ERCB identifying the root causes of the noncompliance, detailing what procedures the licensee has implemented internally to prevent occurrence of a similar event, and meet with the ERCB to explain the noncompliance issues and the devised corrective action plan.</p> <p>Apache Canada Ltd. subsequently abandoned the well, completed the Digital Data Submission, submitted an action plan that was accepted by the ERCB, and met with the ERCB to explain the noncompliance issues and the devised corrective action plan.</p> <p>Compliance achieved.</p>

If you require further information, contact Customer Contact Centre, 403-297-8311 or Inquiries@ercb.ca.

Endnotes

¹ **Directive 019 – High Risk Enforcement Action 1 Summary**

In accordance with *Directive 019: ERCB Compliance Assurance–Enforcement*, High Risk Enforcement Action 1 is initiated against a licensee when the ERCB identifies a High Risk noncompliance event. To address High Risk Enforcement Action 1, the licensee must: immediately correct/address the High Risk noncompliance; if necessary, suspend operations (partial or full), when safe to do so, to remove the existing or potential impact/hazard (suspension will not occur if it results in an increased impact/hazard to the environment or public; compliance must be achieved prior to start-up); develop and implement a written action plan within 60 days (or in the time specified by the ERCB group); notify the ERCB group that the High Risk noncompliance has been corrected/addressed in the specified time. In addition, the ERCB will also apply one or more of the following enforcement actions as its authority provides: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension until the noncompliance is corrected/addressed; suspension and/or cancellation of permit, licence, or approval.

² **Directive 019 – High Risk Enforcement Action 2 (Persistent Noncompliance) Summary**

In accordance with *Directive 019: ERCB Compliance Assurance–Enforcement*, High Risk Enforcement Action 2 is initiated against a licensee who has an unacceptable rate, ratio, percentage or number of noncompliances, either in the same or in different compliance categories. To address High Risk Enforcement Action 2, the licensee must: immediately correct/address the High Risk noncompliance; develop and implement a written action plan within 30 days (or in the time specified by the ERCB group) addressing the root causes of previous noncompliance events and detailing what the licensee will do to prevent future noncompliance events in this compliance category/categories; if operations were suspended, have the action plan approved by the ERCB group before start-up; and review the action plan with the ERCB group in a meeting. In addition, the ERCB will also apply one or more of the following enforcement actions as its authority provides: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension; suspension and/or cancellation of permit, licence, or approval.

³ **Directive 019 – High Risk Enforcement Action 3 Summary**

In accordance with *Directive 019: ERCB Compliance Assurance–Enforcement*, High Risk Enforcement Action 3 is initiated against a licensee who has failed to comply with the requirements of High Risk Enforcement Action 1, 2, or 3, or has demonstrated disregard of ERCB requirements that have been identified as High Risk. To address High Risk Enforcement Action 3, the licensee must: immediately correct/address the High Risk noncompliance; if necessary, suspend operations (partial or full), when safe to do so, to remove the existing or potential impact/hazard (suspension will not occur if it results in an increased impact/hazard to the environment or public); develop and implement a written action plan acceptable to the ERCB group that addresses the root causes of noncompliance events and details what the licensee will do to prevent future noncompliance events in this compliance category; and meet with the ERCB group to review and have the action plan approved before start-up of operations if operations were suspended. The ERCB will also apply one or more of the following enforcement actions as its authority provides: noncompliance fees; self-audit or inspections; third-party audits or inspections; partial or full suspension; suspension and/or cancellation of permit, licence, or approval; issuance of an Order (Miscellaneous, Closure, or Abandonment); “Refer” status: focused or global.

High Risk Enforcement Action 3 with global Refer results in formal orders to comply (Closure, Miscellaneous and Abandonment) and the imposition of the global Refer status against the licensee. The global Refer status indicates a licensee’s inability or unwillingness to comply. The status will be considered by the ERCB when deciding to approve or deny future and pending applications by the licensee to the ERCB. In addition, conditions for continued operation may be applied to the entire company.

⁴ **Directive 019 – Low Risk Enforcement Action – Global Refer Summary**

In accordance with *Directive 019: ERCB Compliance Assurance–Enforcement*, Low Risk Enforcement Action – global Refer is initiated against a licensee who has failed to correct/address a Low Risk noncompliance event in the time specified by the ERCB group. Low Risk Enforcement Action – global Refer enforcement results in the imposition of the global Refer status against the licensee and may result in formal orders to comply (Closure, Miscellaneous and Abandonment). The global Refer status indicates a licensee’s inability or unwillingness to comply. The status will be considered by the ERCB when deciding to approve or deny future and pending applications by the licensee to the ERCB. In addition, conditions of continued operation may be applied to the entire company. To address Low Risk Enforcement Action, the licensee must: immediately correct/address the Low Risk noncompliance within the time specified by the ERCB group; notify the ERCB group that the Low Risk noncompliance has been corrected/addressed in the specified time; and provide a written explanation acceptable to the ERCB group addressing the failure to respond and detailing steps to prevent future occurrences.

⁵ **Legislative/Regulatory Enforcement Action Summary**

In accordance with certain legislative authorities, Legislative/Regulatory enforcement results in the imposition of the global Refer status against the licensee and may result in formal orders to comply (Closure, Miscellaneous and Abandonment). The global Refer status indicates a licensee’s inability or unwillingness to comply. The status will be considered by the ERCB when deciding to approve or deny future and pending applications by the licensee to the ERCB. In addition, conditions for continued operation may be applied to the entire company. Enforcement actions that are not administered through *Directive 019*, but rather through existing legislation, and for which enforcement proceeds directly to a formal order and global Refer are: mineral lease expiry, surface lease expiry, environmental and public safety concerns, and failure to demonstrate the right to the purpose of the wellbore, the right to access the surface, and a working interest ownership in the property.