

Frequently Asked Questions

Directive 013 and Inactive Well Compliance Program (IWCP, Bulletin 2014-19)

Updated on March 11, 2016

DISCLAIMER: The frequently asked questions that follow are intended to assist in the general understanding of *Directive 013: Suspension Requirements for Wells and Inactive Well Compliance Program (IWCP, Bulletin 2014-19)* and to help answer common questions on the existing requirements and processes. In the event of conflict, the wording of *Directive 013* prevails over the wording found in these FAQs.

Alberta Energy Regulator

Frequently Asked Questions for *Directive 013* and Inactive Well Compliance Program (IWCP, *Bulletin 2014-19*)

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Issued by Well Abandonment group, Closure and Liability (Oil & Gas)

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1. **Directive 013: Suspension Requirements for Wells**

Q1.1. Do I have to reactivate a suspended well on the AER Digital Data Submission system (DDS) for testing purposes?

A1.1. No, as long as the well does not meet the criteria for reactivating suspended wells under *Directive 013*, section 4, the licensee does not have to reactivate a suspended well on DDS for testing purposes.

(Note: The production event status should indicate “TESTING” in the Petrinex system for the duration of the testing period.)

Q1.2. What date do I use to calculate the inactive well status when a well has never reported any volumetric activity?

A1.2. The rig release or final drill date is used if there is no volumetric activity.

Q1.3. Would the well classification change when a suspended well has a new completion performed?

A1.3. Yes, if the new completion has a higher risk classification.

No, if the new completion has a risk classification that is either lower or the same as the existing classification.

(Note: If the new completion produces enough to be considered reactivated, under *Directive 013*, then the well must be reactivated and is no longer considered suspended.)

Q1.4. Would the well suspension deadline date change when a suspended well has a new completion performed?

A1.4. No, the suspension deadline date is always based on the volumetric activity reported on Petrinex (or final drill date if there is no volumetric activity).

Q1.5. Would activities such as well testing, recompletion, deepening, etc., change the timeframe for the low-risk inactive well to become medium-risk?

A1.5. No, the only activities that could reset the clock for low-risk wells migrating into medium-risk are the following:

- Complete well abandonment (downhole and surface) as per *Directive 020: Well Abandonment*. This would require a well licence abandonment report submitted on DDS and change of the well licence status to “Abandoned.”
- Reactivating the well in accordance with *Directive 013*, section 4 reported on DDS (changing well licence status back to “Issued” or “Amended”).

Q1.6. Do observation wells need to be suspended in accordance with *Directive 013*?

A1.6. No, observation wells are excluded from the requirements of *Directive 013* (and as result from the Inactive Well Compliance Program (IWCP), as long as they have been approved by the AER:

OGCR - 3.020(1) A licensee shall suspend a well, in accordance with the requirements established by the Board, within 12 months after the last producing or injection operations have occurred unless

- (a) the well is produced only to supply a seasonal market, or
- (b) the well is classed as an observation well.

Approval for the conversion of shut-in wells must be granted by the AER's Well Test Group under *Directive 040: Pressure and Deliverability Testing Oil and Gas Wells*—section 4.5.9. Changing the status of a well to “OBSERVATION” is done through Petrinex (by the licensee) and could possibly require a licence amendment under *Directive 056: Energy Development Applications and Schedules*.

From the *Directive 013* point of view, there are no inspection requirements for these wells and there are no deadlines for an observation well status. However, observation wells will be randomly audited to verify that they are being used for observation purposes.

If the well was suspended and then converted to Observation, the licensee can reactivate it in the AER DDS system with the following in the comments section:

“[Name of the person doing submission] – [Current Date] (dd-month-yyyy): Converted to Observation on dd-month-yyyy.”

Once the status has been changed to “OBSERVATION”, the well will be automatically excluded from the Inactive Well Licence List on DDS. If the well is still on the Inactive Well Licence List, the licensee needs to verify the submission on Petrinex.

Q1.7. One option for the downhole requirement is to set a bridge plug. Does the bridge plug need to be permanent?

A1.7. For a high-risk well, a permanent bridge plug is required. For a medium-risk well, a permanent or retrievable bridge plug can be used. However, a permanent bridge plug is recommended if the well is to be abandoned.

Note: It is recommended to follow *Directive 020* when choosing a bridge plug type and setting depth. Retrievable bridge plugs and packer with a tubing plug are not acceptable abandonment methods.

Q1.8. Do the commingled zones have to be suspended separately?

A1.8. There are no specific requirements in the current *Directive 013* to segregate all the different zones at the suspension stage if produced commingled. Therefore, to be in compliance with *Directive 013* suspension requirements, a bridge plug set above the shallowest completion is sufficient.

However, when suspending a well, it is strongly recommended that licensees consider *Directive 020: Well Abandonment* for the following:

- porous zones segregation
- permanent bridge plugs and cement
- 15 metre (m) distance requirement for zonal abandonment

This would reduce the work it would take to abandon a well if and when the licensee decides to do so.

When zones are being produced individually (i.e., segregated zonal completion), the licensee must suspend each zone separately.

Q1.9. What is the “suspension deadline date”?

A1.9. The suspension deadline date is 12 months after a well is given inactive status. Please refer to *Directive 013* for the definition of an inactive well.

Note: The well is required to be suspended and reported on the Digital Data Submission System (DDS) in accordance with *Directive 013* by the suspension deadline. For example, if the well becomes inactive on July 21, 2014, then the suspension deadline date for completing the suspension work and reporting it on DDS is July 21, 2015 (see figure 1 and figure 8).

Q1.10. If a low-risk well has a “Downhole Operation” (i.e., packer and tubing plug, or bridge plug), does it have to be suspended as a medium-risk well?

A1.10. There are no downhole requirements for a low-risk well. If a downhole operation exists, that does not make it a medium-risk well; all the requirements would remain in the low-risk category.

Q1.11. Do all low-risk wells become medium-risk under *Directive 013* after being inactive for 10 years?

A1.11. Yes, all low-risk wells become medium risk after being inactive for 10 years. The initial suspension deadline for medium-risk requirements will be 12 months after the well became a medium-risk type 6 (see figure 1). All subsequent inspection deadlines for medium-risk type 6 wells will be calculated based on the inspection due date in DDS and moved from a specific date to the end of that calendar year. Refer to Q1.35 and Q4.13 for more details.

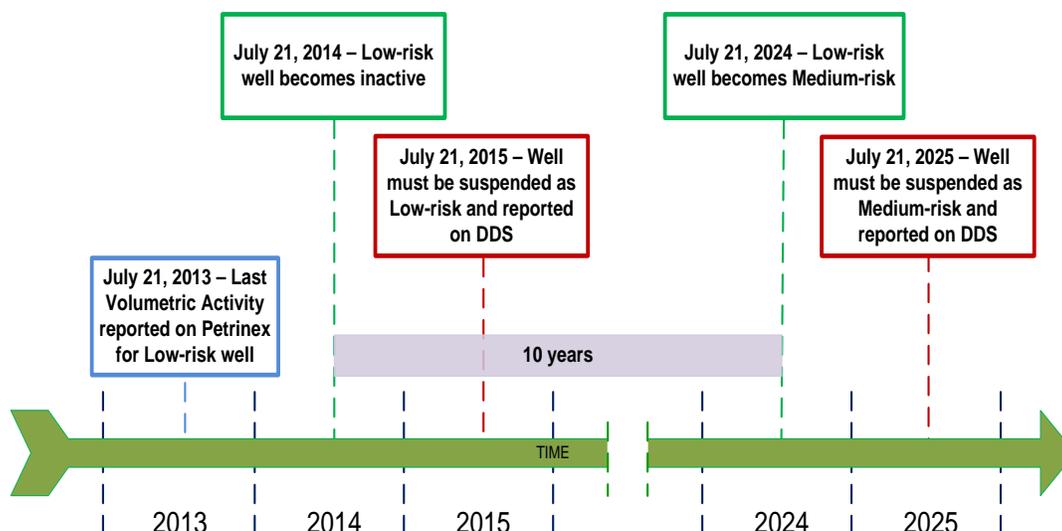


Figure 1: Calculating Medium risk—Type 6 wells

Q1.12. Are freshwater wells excluded from the suspension requirements of *Directive 013*?

A1.12. No, once a licensed well becomes inactive, it must be suspended in accordance with *Directive 013*, regardless of the depth of the well or the salinity of the water being produced.

Q1.13. Does the entire wellbore require the use of inhibitor upon suspension?

A1.13. Yes, if required (only for medium- and high-risk wells) with the top two metres filled with non-freezing fluid.

Q1.14. What can be used as a non-freezing fluid?

A1.14. It is recommended to use any noncompressible nonfreezing fluid that would prevent damaging the wellhead in winter. Using air may increase a potential of casing corrosion and subsequent failure at the air-to-fluid contact depth.

Q1.15. If a suspended well is fully abandoned (including surface abandonment where the well is cut and capped), is it automatically removed from the suspended/inactive well lists?

A1.15. Yes, once the surface abandonment (cut and cap) is completed and the well licence abandonment is submitted on the DDS system (AER / Submissions / Licence Abandonment / Submit Well Licence Abandonment Report), the well is automatically removed from the Inactive Well Licence List.

Q1.16. When reactivating suspended wells, *Directive 013* states that wellheads must be inspected, serviced, and pressure tested. For all wells, what are the pressure and time requirements?

A1.16. There is no specified time requirement for pressure testing the wellhead. However, the manufacturer’s operating manual should provide the pressure testing requirements and conditions

for testing the wellhead. The entire reactivation procedure of a suspended well is part of the inspection process and must be submitted on the DDS system.

Q1.17. Do downhole pumps need to be removed from low-risk wellbores before suspension?

A1.17. Even though this is not a requirement of *Directive 013*, due to a previous incident where the polish rod leaked, we do recommend that you remove the polish rod.

Q1.18. What happens if a well is drilled and cased, but not completed and there is no volumetric activity?

A1.18. The final drill date must be used as a last volumetric activity date to calculate *Directive 013* suspension deadlines.

Q1.19. We have quite a few flow tests that were done that came back with a 0.0 million cubic feet per day volume. Is this considered a reportable volume?

A1.19. No, from the Petrinex perspective it is not a reportable volume; and from the “Well Test Data Capture” view, although licensees do report these 0.0 volumes, we do not consider this a "reportable volume" for any of our requirements.

Q1.20. If a well is completely abandoned downhole, meaning all zones are abandoned according to *Directive 020*, but the well is not surface abandoned, do I still need to comply with the *Directive 013* requirements?

A1.20. Yes, if all zones in a well are fully abandoned as per *Directive 020*, the licensee must either

- perform a surface abandonment (cut and cap) of the well within 12 months in accordance with *Directive 020* and submit the well license abandonment report in DDS, or
- suspend the well in accordance with *Directive 013*.

Q1.21. Are we required to report failures that are detected when performing an initial suspension or ongoing inspections on a suspended well?

A1.21. Yes. All failures must be reported accompanied by the date that the failure was detected. This includes

- packer/plug failures
- gas migration
- vent flows
- casing failures
- wellhead failures

Note: For gas migration / surface casing vent flow (GM/SCVF) issues, the licensee must also submit a separate report under *Interim Directive (ID) 2003-01*. Based on *ID 2003-01*, if GM/SCVF

is classified as “Non-serious,” the inspection outcome in the Well Licence Suspension Report must indicate “Satisfactory” because the repair operations of non-serious GM/SCVF can be postponed until well abandonment. If the SCVF/GM is classified as serious, it must be repaired within 90 days in accordance with ID 2003-01.

Q1.22. Which wells are excluded from *Directive 013* suspension requirements?

A1.22. Excluded from *Directive 013* suspension requirements are

- wells with a licence status of Re-Entry, Abandoned, RecCertified, and RecExempt;
- observation wells;
- cavern wells with associated scheme approval;
- geothermal wells (used only for HVAC heating purposes);
- training wells; and
- farm wells.

Q1.23. Is it a requirement to pressure test a well if it has a rod or a pump jack?

A1.23. There is a requirement to make sure everything is properly shut in. If the rod is an issue when it comes to getting a proper pressure test, you will have to remove it. However, if you can get a proper test without removing it, you may leave it in.

Q1.24. If the AER approves both class 1A & class II disposal in a well, under which risk category will the well belong?

A1.24. It will be the highest risk category. Therefore, the well must be classified as a class 1A under the high-risk category (*Directive 013*, section 3, table 1).

Q1.25. Where a licensee has a well that was drilled in 1975, fully abandoned (downhole and surface) in 1985, and re-entered in 2005, what is the rig release date for that well?

A1.25. It will be the most recent date of 2005.

Q1.26. Is it possible to request an extension to an existing *Directive 013* deadline?

A1.26. No, under the AER’s Compliance Assurance Program, self-disclosures or extensions pertaining to the Inactive Well Compliance Program and *Directive 013* requirements will not be accepted (see *Bulletin 2014-19*).

Q1.27. What is compliance with *Directive 013*?

A1.27. An inactive well is considered to be compliant with *Directive 013* if it meets the following requirements:

- downhole (if applicable),

- surface,
- ongoing inspections, and
- reporting on DDS under Well Licence Suspension Report

Note: You should NOT submit the surface inspections until all downhole work and pressure testing are completed (if applicable). If surface inspection and downhole work (including pressure testing) are conducted on different dates, the latest activity date must be used as an inspection date for DDS reporting.

Q1.28. When reactivating medium-risk or high-risk wells, do I need to report a well-pressure test?

A1.28. Medium-risk and high-risk wells must be pressure tested before reactivation to ensure wellbore integrity. The licensee must keep the record of the pressure tests on a well file and report it on DDS under “Well Licence Suspension Report/Reactivate Well Licence” as a mandatory well reactivation submission after the well acquires active status (i.e., it operates for at least 1 hour per month for three consecutive months).

Q1.29. Is the AER giving any consideration to the fact that a lot of good producing wells are shut in because they are not economical to produce at this time and they will become noncompliant?

A1.29. Yes, those considerations are in *Directive 013*. If the well is not being operated and has not been fully abandoned in accordance with *Directive 020*, it must be suspended under *Directive 013* to ensure public and environmental safety.

Q1.30. Where can I find a list of our critical sour wells?

A1.30. The list of critical sour wells can be ordered from AER Information Services at infoservices@aer.ca.

Q1.31. Does any suspended well (low risk, medium risk, and high risk) have to be disconnected from associated pipelines?

A1.31. Yes, if the well is suspended, it may need to be disconnected from associated pipelines. *Directive 013* doesn't specify that the wellhead has to be physically disconnected from the pipeline once the well is shut in and requires suspension (see *Directive 013*, section 3, table 1):

There shall be no wellhead leaks. Regular wellheads require servicing and pressure testing of sealing elements at time of suspension and at each subsequent inspection. All outlets except surface casing vents are to be bull plugged or blind flanged with needle valves. Valves must be functional (open/close). Grease and service as required to maintain functionality.

However, disconnecting the pipeline from the wellhead is a requirement in the pipeline regulations for discontinuation, *Pipeline Rules*, section 82:

- (1) Unless otherwise authorized by the Regulator, a licensee shall discontinue, abandon or return to active flowing service a pipeline that has not seen active flowing service within the last 12 months.
- (3) When a pipeline or part of a pipeline is discontinued, the licensee shall ensure that the pipeline or the part of the pipeline that is discontinued is
 - (a) physically isolated or disconnected from any operating facility or other pipeline,
 - (b) cleaned, if necessary,
 - (c) purged with fresh water, air or inert gas, any of which may include the addition of internal corrosion inhibitors if the licensee is prepared to mitigate the environmental effects that could occur as a result of accidental release or spillage,
 - (d) protected by suitable internal and external corrosion control measures,
 - (e) not isolated or disconnected in a manner that results in an adjoining operating pipeline having fittings or connection points remaining that would create stagnant fluid traps or dead legs, unless
 - (i) those locations are permanently accessible and subject to a scheduled inspection program, or
 - (ii) the contained fluids are confirmed and documented as being non-corrosive,
 - and
 - (f) left in a safe condition.

Q1.32. Which risk category and requirements must be used for SAGD or CSS wells?

A1.32. The answer will depend on many factors, such as proximity to a steam chamber, whether steaming operations are in the area, whether there are any well integrity concerns, etc. The current *Directive 013* has no specific category for thermal wells. We recommend considering the following when suspending a thermal well and reporting it on DDS:

- Wells within 300 m of steam-assisted gravity drainage (SAGD) wells:
 - Suspend with a bridge plug or tubing plug; report it on DDS as Medium Risk suspended
- Wells within 1000 m of cyclic steam stimulation (CSS) wells:
 - Suspend with a bridge plug or tubing plug; report it on DDS as Medium Risk suspended.
- All other wells (including wells that do not penetrate the SAGD/CSS injection zone):
 - Suspend in accordance with *Directive 013*, table 1.

However, the onus is on the operator to risk assess each well individually and suspend it in accordance with *Directive 013* to ensure environmental and public safety.

Q1.33. We have a scale inside the tubing, and we were able to pressure test it to 7 megapascals for 10 minutes – would that qualify as a tubing plug for medium-risk or high-risk suspension?

A1.33. No, the actual tubing plug must be installed to ensure long-term isolation.

Q1.34. How can I declassify a critical sour well?

A1.34. If the well is licensed as “Critical Sour,” it must be suspended in accordance with the high-risk category under *Directive 013*. When the sour zone no longer meets the definition of critical sour (e.g., it is properly abandoned in accordance with *Directive 020*, the zone is depleted, etc.) the well can be declassified from critical sour under *AER ID 90-01*, section 5.2. However, until the well licence classification is changed, the well will remain in the high-risk category. Applications for declassification must be submitted to welloperations@aer.ca.

Q1.35. Do inspections need to be reported within 30 days or within 12 months?

A1.35. The deadline for an inspection (work completed and reported on DDS) is calculated based on the inspection due date in DDS and moved from a specific date to the end of that calendar year. For example, if a medium-risk well is suspended on April 1, 2015, using a packer and tubing plug, the inspection frequency is three years and the inspection due date would be April 1, 2018. The inspection deadline date (that means work completed and reported on DDS) is December 31, 2018. If the report is missing on December 31, 2018, the well will be noncompliant with *Directive 013* requirements.

Q1.36. Is the timeline for re-inspection calculated from the date of last inspection or from the date of last volumetric activity?

A1.36. Re-inspection is calculated based on the date of the last inspection. See Q1.35 for more details.

Q1.37. Our company has a few wells that were licensed as re-entry wells, but they were never re-entered. The well licence status has changed to amended. How does that affect the inactive well list?

A1.37. In this case the well will appear on the inactive well licence list as noncompliant. The licensee will have to revert the well licence status back to “Abandoned” or “Reclaimed.”

For details please contact *Directive 056* group at Directive56.Help@aer.ca.

Q1.38. We have a scenario where a well is suspended, and we did an inspection and found that a tubing plug has failed. The inspection outcome is then unsatisfactory with repairs required. We are conducting the necessary repairs. What compliance status is assigned to the well while repairs are ongoing?

A1.38. The well will have a status of noncompliant until the repairs have been completed.

Q1.39. In a scenario in which a well with a five-year inspection cycle was inspected and the inspection outcome was satisfactory, what happens if two years later an AER field inspector inspects it and finds a leak? Since we've not been required to inspect during that timeframe, how will enforcement be managed in this case?

A1.39. The leak will be inspected and investigated for the root cause. The enforcement will be issued under the wellsite inspection compliance category. For the specifics on the compliance assurance process, contact ComplianceCoordination@aer.ca.

Q1.40. When we remove all the valve handles on the wellhead (instead of chaining and locking), can we leave the removed handles at the wellsite?

A1.40. No, all valve handles must be removed from the wellsite or locked inside the secure facility to prevent accidental opening of the well by anyone.

Q1.41. Can the pressure gauge be left connected and substitute for the bull plug?

A1.41. Yes, leaving the pressure gage connected instead of bull plug will satisfy the *Directive 013* requirement to have all outlets except surface casing vents bull plugged or blind flanged with needle valves. However, it is recommended to consider the fragile nature of the pressure gauge, which can be damaged in the winter months or due to an act of vandalism.

Q1.42. We have a freshwater well that is completed with the slotted liner. How do we suspend it in accordance with medium risk requirements of *Directive 013* (e.g., bridge plug)?

A1.42. Freshwater wells are required to be abandoned and reclaimed after being inactive for more than three years in accordance with *Water Act* section 55. Accordingly, this type of well will never become a medium risk - Type 6 under *Directive 013*.

2. The Inactive Well Licence List

Q2.1. Where can I find the Inactive Well Licence List?

A2.1. The Inactive Well Licence List can be downloaded from both the AER website and the DDS system:

AER website: <http://www.aer.ca/rules-and-regulations/directives/directive-013> (under supplemental information section)

DDS: AER > Reports > Licence > View/Download Inactive Well Licence List

Note: This report is a list of inactive well licences that become inactive under *Directive 013*. It is automated and updated daily and requires Microsoft Excel 2007 (or a more recent version).

Alberta Energy Regulator
Digital Data Submission (DDS) System

AER HOME | DDS HELP | HIDE MENU

User: []
[Log off]

Expand All

- [-] Digital Data Submission Home
- [-] AER
 - [-] Applications
 - [-] Audit
 - [-] Field Surveillance
 - [-] Incidents
 - [-] Notifications
 - [-] Reports
 - [-] Base Groundwater Protection
 - [-] Gas Processing Plant
 - [-] Integrated Application Registry (IAR) QI
 - [-] Liability Rating
 - [-] **Licence**
 - [-] View/Download Inactive Well Licen
 - [-] Submissions History
 - [-] Submissions
 - [-] DDS Administration

Inactive Well Licence List

This list contains all inactive well licences and related compliance information as defined by *Directive 013: Suspension Requirements for Wells*.

Effective April 1, 2015, the following changes were made to the inactive well licence list in order to improve industry operational effectiveness and efficiency with regards to *Directive 013* requirements:

- The inactive well licence list is automated and updated daily. To download the list, Microsoft Excel 2007, or more recent version, is required.
- The "Forecasted inactive well licence list" was added under a separate tab in the inactive well licence list. It contains all the well licences that are not inactive as per *Directive 013* and includes the following:
 - wells that are classified as critical sour and have not reported any volumetric activity for three consecutive months, and
 - all other wells that have not reported any volumetric activity for six consecutive months.
- Suspension deadline - The suspension deadline date is now 12 months after the inactive status date. The well is required to be suspended and reported on the Digital Data Submission System (DDS) in accordance with *Directive 013* by the suspension deadline. For example, if the well becomes inactive on April 21, 2015, then the suspension deadline date for completing the suspension work and reporting it on DDS is April 21, 2016.
- Inspection deadline - The deadline for inspections will be calculated based on the inspection due date in DDS and moved from a specific date to the end of that calendar year. For example, if the medium-risk well is suspended on April 1, 2015, using a packer and tubing plug, the inspection frequency is three years and the inspection due date would be April 1, 2018. The inspection deadline date will be December 31, 2018.
- Reactivation criteria - For a well to attain active status and to be reactivated on DDS, it must report volumetric activity for at least one hour per month for three consecutive months.

These changes will be reflected in a revised version of *Directive 013*.

[Download Inactive Well Licence List](#)

Annual target quotas and progress report on the Inactive Well Compliance Program (IWCP, *Bulletin 2014-19*) can be downloaded from the following link:
[Download IWCP annual target quotas and progress report](#)

Please direct general inquiries to AER Well Operations at (403) 297-5290 or by e-mail at WellOperations@aer.ca
Please forward all inquiries about the Inactive Well Compliance Program (*Bulletin 2014-19*) to IWCP@aer.ca

Figure 2: Locating the Inactive Well Licence List on DDS

Q2.2. Who can see the Inactive Well Licence List?

A2.2. Effective March 1, 2016, the inactive well licence list is available to everyone. Refer to Q2.1.

Q2.3. What information does the Inactive Well Licence List provide?

A2.3. The columns in the Inactive Well Licence List are

- Well Licence Number
- Licensee's Name
- Licensee's BA Code
- UWI
- Well Surface Location
- AER Field Centre
- Well Licence Status
- Final Drill Date
- Last Volumetric Activity Date
- *Directive 013* Inactive Status Date
- Industry Reported Suspension Date
- Next Inspection Due Date
- Industry Reported Risk Class
- AER Deemed Risk Class

- *Directive 013* Compliance Status
- Noncompliance Details
- IWCP marker
- Additional Information

Q2.4. How does the Inactive Well Licence List calculate *Directive 013* compliance status?

A2.4. *Directive 013* compliance status is calculated based on both the information currently reported on the DDS system under “Well Licence Suspension Report” and on historical volumetric data from Petrinex. The business logic for the Inactive Well Licence List applies *Directive 013* requirements to the reported information on DDS and Petrinex and assesses compliance with *Directive 013*.

Note: For Inactive Well Licence List updates, the information from Petrinex is updated monthly; the information from DDS is updated daily.

Q2.5. What is the Inactive Well Licence List?

A2.5. The Inactive Well Licence List contains the inventory of wells that are inactive in accordance with *Directive 013*. The list consists of

- critical sour wells that have had no volumetric activity for six consecutive months, and
- any other well that has had no volumetric activity for 12 consecutive months.

Q2.6. In the Inactive Well Licence List, what does the “Forecasted Inactive Well List” tab provide?

A2.6. The “Forecasted Inactive Well List” tab in the Inactive Well licence List provides the inventory of wells that could potentially become inactive under *Directive 013*. The list consists of

- critical sour wells that have had no volumetric activity for three consecutive months, and
- any other well that has had no volumetric activity for six consecutive months.

Q2.7. If a well has a drilling licence but has never been drilled, is it considered inactive under *Directive 013*?

A2.7. These wells are considered to be “paper wells” and are not included on Inactive Well Licence List.

Q2.8. After logging into DDS I cannot see the link to download the Inactive Well Licence List; what do I do?

A2.8. Contact your company DDS administrator to get access to this part of DDS.

Q2.9. If the “AER Deemed Risk Class” is showing up as high-risk and we believe that it should be a medium-risk or low-risk well, what could be the reason for the discrepancy?

A2.9. The high-risk category (*Directive 013*, section 3, table 1) consists of critical sour wells (perforated or not), acid gas wells, and class 1A waste disposal wells. These designations are assigned when the

well is either licensed or approved for scheme operations. If a well appears as high risk, that means one of these designations is still assigned to the well.

To remove “Critical Sour” status, a declassification request must be sent to welloperations@er.ca in accordance with ID 90-01, section 5.2. If the approval is granted, the licensee will receive a declassification letter and the electronic record of the well will be updated to “Declassified Critical Sour.”

To remove an acid gas designation, either the scheme must be terminated or the well licence must be removed from the scheme. The licensee must submit a request to the *Directive 065* group, providing all the supporting documentation to verify the reason for termination. Reasons could be that

- the licensee has never completed (perforated) the zone approved for acid gas injection,
- the licensee has never injected acid gas into the approved zone and there are no offset wells in the area that are injecting, or have injected acid gas into the same zone, or
- the zone with acid gas was completely and fully abandoned in accordance with level-A requirements of *Directive 020*.

After the *Directive 065* team reviews and approves the application, the scheme approval gets terminated or the well licence gets removed from the scheme by the *Directive 065* group.

Q2.10. We removed the critical sour or acid gas designation, but the well is still showing up as high-risk on the AER Inactive Well Licence List. Why?

A2.10. The reason could be in one of the following:

- The licensee had reported the well as high risk on DDS. In this case the AER business rules will default to the licensee reported risk class if it is higher than the AER deemed risk class.
- Removal of the critical sour or acid gas designations wasn’t updated by the AER personnel who issued the approval. Follow up with the AER group that issued the approval to update the well’s electronic records.

Q2.11. We have updated the record with the most recent inspection on the DDS system; however, the Inactive Well Licence List is still showing the well as noncompliant for the reason, “Suspension is not reported for the current inactive period.” Why?

A2.11. “Suspension not reported for current inactive period” means that the well doesn’t have a suspension report on the AER’s DDS system for the most recent inactive period (after the “*Directive 013* Inactive Status Date”). To address this issue, the well reactivation must be submitted through the DDS system to reflect the latest active period. After that, the suspension records with the correct dates (after “*Directive 013* Inactive Status Date”) must be resubmitted.

Q2.12. We have fully abandoned the well downhole and at surface (cut and cap) in accordance with Directive 020; however, the well is still showing up on the Inactive Well Licence List. Why?

A2.12. When the well is completely abandoned in accordance with *Directive 020*, the licensee must submit a well licence abandonment report on DDS. This will change the well licence status to “Abandoned” and will automatically remove it from the Inactive Well Licence List with its next update. Always verify the well licence status to ensure that it is showing “Abandoned”; otherwise the well will remain on the Inactive Well Licence List.

Note: The downhole abandonment information must be submitted in accordance with *Directive 059* prior to the well licence abandonment (*Directive 020* submission).

To submit a well licence abandonment report, please log into DDS under AER>Submissions>Licence Abandonment>Submit Well Licence Abandonment Report

Q2.13. We have an old well that we know has been fully abandoned in accordance with Directive 020 (downhole and surface), but we cannot find the record for it. What do we do?

A2.13. The licensee will have to conduct a gas migration test to confirm that the well is not leaking.

Every effort should be made to track down the original surface abandonment information. You may want to try pulling the files at the Core Research Centre to see if you can find anything.

If there is absolutely no information, you must complete the following:

- Locate the well using the well coordinates, and confirm the location using a metal detector.
- Conduct a gas migration (GM) test to ensure that there is no indication that the well is leaking (infrared method is acceptable)
- If vegetation distress is noted, investigate the well further, and if the well is identified to have active gas migration, repair the well.

The licensee must keep a record of the GM tests (in-house) in case the well is ever selected for audit.

For the DDS submission, you will need to enter the date on which you located the well and completed the GM test. Please use the recent GM test date for the required “SCVF Test Date” or “Static Fluid Level Test Date” field in the DDS system. Also, in the comments field of your DDS submission, clarify the situation with respect to the lack of data and the recent site inspection and testing.

Q2.14. Why is our currently producing well listed as noncompliant due to “Inactive well reported as reactivated”?

A2.14. A well attains active status after it has operated for a minimum of 1 hour per month for 3 consecutive months. Therefore, noncompliance reason “Inactive well reported as reactivated” means that the licensee submitted the well reactivation report on DDS before obtaining the active status (i.e., 1 hour per month for three consecutive months). As soon as the well meets the reactivation criteria, it will automatically be removed from the inactive well licence list.

Q2.15. Why is the well listed as noncompliant due to “Failure Repair Completed Date not submitted”?

A2.15. This is because the latest inspection outcome submitted in DDS indicates “Repair required.” This means that during the last inspection some deficiencies were identified under *Directive 013* requirements but haven’t been repaired yet. The noncompliant status will remain for the well until the deficiencies are repaired and the well inspection report is updated, respectively, indicating repair completed date

Q2.16. We have a reclamation certificate for the well. Why the well showing up on the Inactive Well Licence List?

A2.16. The well is missing a well licence abandonment report (cut and cap), and as result the well licence status hasn’t been changed to “RecCertified.” Please submit a well licence abandonment report on DDS as per *Directive 020* (see also Q2.12 in this section).

Q2.17. Why are some of our observation wells showing up in the Inactive Well Licence List?

A2.17. The status of a well is changed to “OBSERVATION” through Petrinex (by the licensee), and it could possibly require a licence amendment under *Directive 056*.

Once the status has been changed to “OBSERVATION,” the well will automatically be excluded from the Inactive Well Licence List on DDS. If the well is still listed on Inactive Well Licence List, the licensee needs to verify the submission on Petrinex.

Please refer to Q1.6 in the *Directive 013* section of this document for details.

Q2.18. Why are some of our cavern wells included in the Inactive Well Licence List and some of them not?

A2.18. Only the cavern wells with a scheme approval are excluded from the Inactive Well Licence List.

Q2.19. On the Inactive Well Licence List, why is the “Directive 013 Inactive Status Date” is older than the “Last Volumetric Activity Date”? Is it 6 or 12 months after the last volumetric activity date?

A2.19. The Inactive Well Licence List logic accesses the historical volumetric data from Petrinex and identifies the periods with no volumetric activity for 6 or 12 consecutive months (based on the risk category of the well). This determines the *Directive 013* inactive status date.

If after the *Directive 013* inactive status date, the well has reported some volumetric activity but not enough to meet the reactivation criteria of *Directive 013*, section 4, the inactive status date will remain.

Q2.20. We have reported the suspension on Petrinex. Why is the well still showing up as noncompliant on the Inactive Well Licence List?

A2.20. To comply with *Directive 013*, a well licence suspension report must be submitted on DDS. Please refer to *Directive 013*, section 8.

Petrinex is a system that collects the volumetric data and status for individual production events. One well can have several production events. The DDS system collects data based on the well licence number as required by AER directives (including *Directive 013*). Petrinex and DDS are two different systems and support two separate processes. There is no direct link between two submissions.

Q2.21. We have sold a well to a different licensee. Why is it still showing up as ours on the Inactive Well Licence List?

A2.21. This is a well licence transferring issue and must be addressed by the Liability Management Group (e-mail: LiabilityManagement@aer.ca). Until the well licence status is changed (e.g., to “Re-entry”) or transfer is completed, the current licensees must ensure that the well is properly suspended in accordance with *Directive 013*.

Q2.22. How can I clarify the specific reason for why the well is noncompliant on the inactive well licence list?

A2.22. The estimated reason of noncompliance is provided in the “Noncompliance details” column of the inactive well licence list. It is as accurate as the information that is reported under *Directive 013*. It is a licensee’s responsibility to complete a full review of the inactive well and *Directive 013* to ensure compliance.

Q2.23. Do we have to suspend wells that are on the forecasted inactive well list, and will it keep those from being transferred to the Inactive Well Licence List?

A2.23. No, the wells listed on the forecasted inactive well list don’t have to be suspended until they become inactive under *Directive 013*. The forecasted inactive well list contains wells that could potentially become inactive in accordance with *Directive 013* and is provided to help licensees with operational planning of the *Directive 013* activities (also see Q2.6).

3. The Digital Data Submission (DDS) System

Q3.1. Where can I find the link to the AER DDS system?

A3.1. The link to the AER DDS system is on the AER website under “Systems & Tools”:

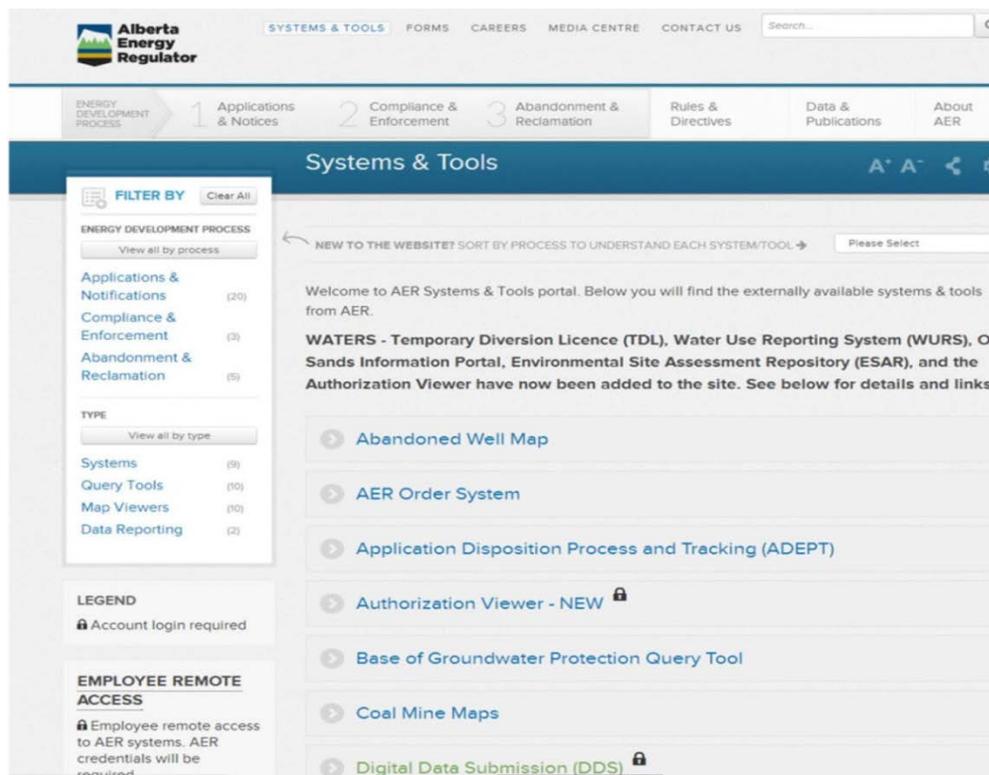


Figure 3: Locating the link to the DDS system.

Q3.2. How do I access DDS?

A3.2. Each licensee has its own DDS administrator login credentials and its own person assigned as DDS administrator. To access DDS, contact your company’s DDS administrator for the login name and password.

Q3.3. Where do I submit the well licence suspension report on DDS?

A3.3. Once you logged in, on the left-side menu under AER > Submissions > Licence Suspension > Submit Well Licence Suspension Report (see figure 4).

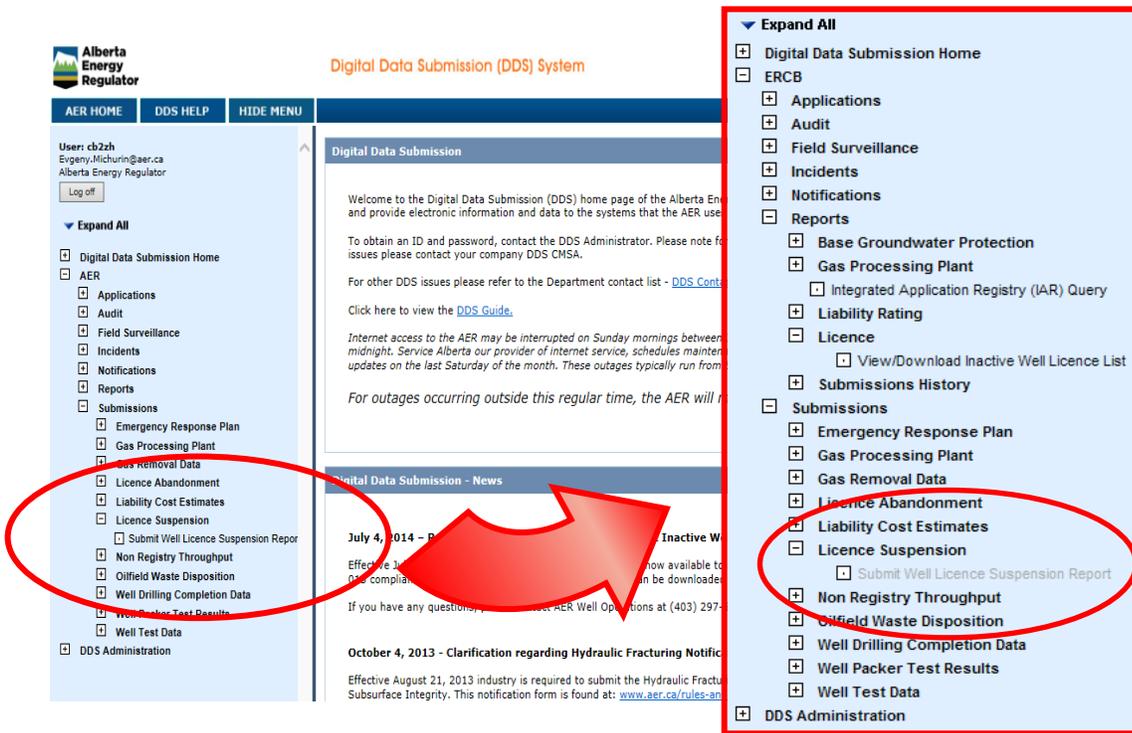


Figure 4: Locating the well licence suspension report menu

Q3.4. Which menu item is for the well licence suspension submission?

A3.4. “Manage well licence suspension” (see figure 5):

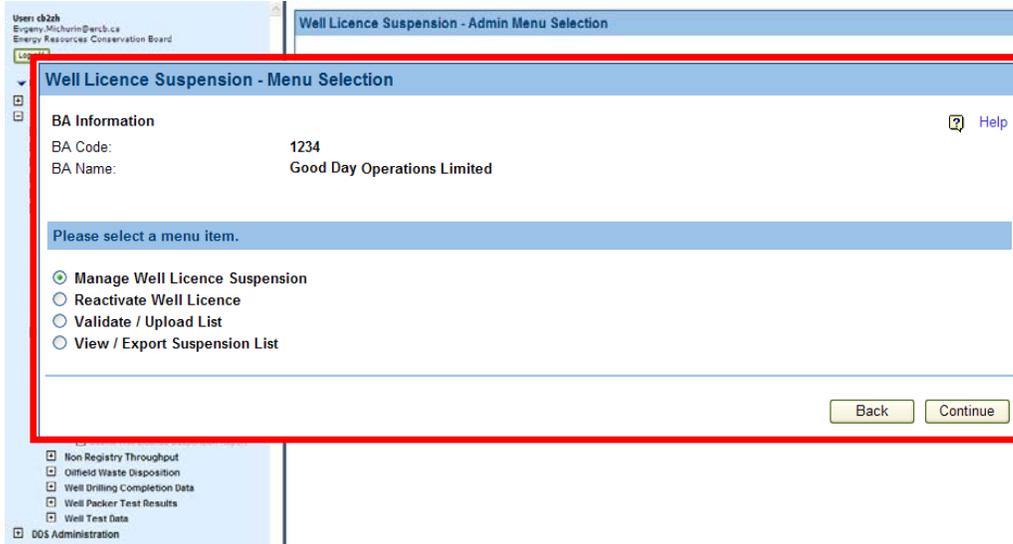


Figure 5: Licence suspension menu items

Q3.5. Do I have to complete all five tabs when submitting a well licence suspension?

A3.5. Yes, all five tabs must be completed (see figure 6):

Figure 6: Well licence suspension report window

Q3.6. Is there a general help file for the well licence suspension part of DDS?

A3.6. Yes, the help file notes are on each page and are marked as “Help.” They are typically located at the upper right corner of the page.

Q3.7. When trying to update the suspension details with a new “Suspension Class” and “Well Operational Type” it is greyed out and I am unable to edit it. How can I update this information?

A3.7. To allow this correction of the Suspension Details tab, licensees must identify this as an operation change as follows (see also the screenshot below):

1. Go to the “Inspection List” tab.
2. Click on the latest inspection record link.
3. Set “Operation Changes” from “No” to “Yes” (in the right lower corner).
4. Click “Update List” in the middle of the screen.
5. Click “OK” to the pop-up window.
6. Go back to “Suspension Details” tab and update the information as needed.
7. Click “Submit” to save the changes.

Contact Information	Suspension Details	Inspection List	Working Interest Participants	Comments
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Inspection List

Note: Any changes to the Inspection List are not saved to the AER database until you SUBMIT the Well Licence Suspension Report.

Inspection Report Date (click to edit)	Last Inspection Date	Inspection Reason	Inspection Outcome	Next Inspection Due By
Dec 15, 2006	Dec 15, 2006	Initial Inspection	Satisfactory	Dec 31, 2011

1

Inspection Details

'NO' is equivalent to 'Not Tested' for the following failures.

Casing Failure:	<input type="text" value="No"/>	Inspection Report Date:	Dec 15, 2006
Packer/Plug Failure:	<input type="text" value="No"/>	Inspection Date:	Dec 15, 2006
Wellhead Failure:	<input type="text" value="No"/>	Inspection Reason:	Initial Inspection
Gas Migration:	<input type="text" value="No"/>	Inspection Outcome:	Satisfactory
Vent Flow:	<input type="text" value="No"/>	Repair Completed:	<input type="text" value="No"/>
		Operation Changes:	<input type="text" value="No"/>

The licensee is required to notify the AER via the DDS Casing Failure or DDS SCVF/GM or DDS Isolation Packer Test Results Services within 30 days of detecting a downhole problem.

Inspection Comments

Figure 7: Setting the “Operation Changes” to allow suspension details to be updated

Q3.8. When trying to submit the inspection for a low-risk well (as per *Directive 013* calculations), the DDS pop-up notification window identifies this well as medium risk—type 6, and doesn’t allow the inspection to be submitted under the low-risk category. Why is this happening, and how can I correct the well licence suspension report?

A3.8. “Suspension Date” submitted in the well licence suspension report is used by the DDS system for calculating 10 years for low-risk well to become medium-risk—type 6. If the deadline passes, the system doesn’t allow any records to be submitted under the low-risk category. To address this issue, please submit a reactivation report (reactivate on DDS) for this well licence indicating in the comments section the following:

“DD-MONTH-YYYY – [Your Name] – Reactivated to submit most recent low-risk inspection”

Then resubmit the suspension report with correct information and dates (suspension date must be the date of the last inspection). Also refer to Q1.11 in the *Directive 013* section of this document for details on how to calculate medium-risk type 6 timelines.

Q3.9. I have accidentally submitted the incorrect inspection information. How can I delete this single inspection report and submit the correct one?

A3.9. A single well inspection report cannot be deleted. To address this issue, in the inspection comments please indicate that an inspection was incorrectly submitted:

“Invalid inspection report due to incorrect data submission”

Then submit the correct inspection report on top of the incorrect one. The Inactive Well Licence List logic will only consider the most recent inspection record (by submission date).

Q3.10. I have accidentally submitted a well licence suspension report from a different well licence number. How can I remove this report and submit the correct one?

A3.10. The well licence suspension report can no longer be deleted by either the AER or the licensee. To address this issue, please submit the reactivation report (reactivate on DDS) for this well licence indicating in the comments section the following:

“DD-MONTH-YYYY – [Your Name] – Reactivated to remove the incorrect data submission from a different well licence”

Then resubmit the suspension report with correct information and dates. Inactive Well Licence List logic will only consider the current well licence suspension report.

Q3.11. When submitting suspension details for the medium-risk—type 6 category on wells that were low-risk—type 1, what do I indicate for the downhole operation?

A3.11. For the downhole operation on a low-risk—type 1 migrated to a medium-risk—type 6, the “Cement plug” option should be chosen.

Q3.12. What date should be entered in the “Suspension Date” field on DDS?

A3.12. The date when suspension operations are fully completed according to the requirements of Directive 013.

Q3.13. If a well suspension is late, should we backdate the “Suspension Date” to compensate for an incorrect 10-year maturation date calculated by DDS?

A3.13. No, you must always enter the correct suspension date (the date when the suspension was completed).

Q3.14. We are working on a full well-status audit and have come across several wells that are suspended in the field but that were never reported on DDS. Should we be backdating the suspension to the actual date that the well was suspended?

A3.14. Yes, the “Suspension Date” must always indicate when the actual work was done.

Q3.15. On the DDS there is a question under "Suspension Details" Gas over bitumen well – “Yes” or “No”? When answering this question, are you asking if this well is in a GOB area i.e. Athabasca oil sands area, Cold lake oil sands area? Or are you asking has this well been ordered Shut-in due to GOB?

A3.15. See the DDS online guide, “Using the Suspension Details Screen.” It reads, “Indicate if there is gas over bitumen using the Gas Over Bitumen list. The Gas Over Bitumen List is found on the AER Website.” All of the content for the Gas Over Bitumen (or Bitumen Conservation) can be found here: <http://www.aer.ca/rules-and-regulations/by-topic/bitumen-conservation>

Q3.16. There is a “View/Edit Suspension List” option in the DDS Well Licence Suspension – Menu Selection area. Can you confirm my understanding that this list is inaccurate and that the Inactive Well Licence List is correct?

A3.16. Yes, “View/Edit Suspension List” doesn’t contain all the suspended wells and should be used with caution (see figure 5). It is recommended to use the Inactive Well Licence List (see section 2 of these FAQs) as it is correct and contains all the wells that are currently inactive under *Directive 013*.

Q3.17. In DDS under inspection details it states “No” is equivalent to “Not Tested” for the casing failure, packer/plug failure, wellhead failure, and gas migration / vent flow (see figure 7). The choices are Yes or No. Are these tests not mandatory? Does anything flag if they say “No”?

A3.17. Casing failure and packer/plug failure tests are mandatory for wells that require pressure testing in accordance with *Directive 013*. Wellhead testing is mandatory for all wells. It is recommended to test all wells for surface casing vent flow / gas migration at the time of initial suspension and any subsequent inspection. If any failures are identified, it must be reported as “Yes” under well licence suspension report. SCVF/GM and casing failures must also have a separate report completed in accordance with *ID 2003-01* (also see Q1.21).

4. The Inactive Well Compliance Program (Bulletin 2014-19)

Q4.1. What will change in the Inactive Well Licence List on April 1, 2015?

A4.1. On April 1, 2015, the Inactive Well Licence List will have added an additional column named “IWCP”. This column will have only “Y” or “N” options for each individual well and will indicate which wells are part of the Inactive Well Compliance Program.

Q4.2. How will the AER notify the licensee about the IWCP annual target quotas?

A4.2. Each licensee will be receiving a notice of noncompliance letter by registered mail or by e-mail (if registered with the IWCP team at iwcp@aer.ca) as well as through the [IWCP annual target quotas and progress report](#) (published on the AER website on April 1, 2015).

Q4.3. Which wells will be marked as IWCP on the Inactive Well Licence List?

A4.3. All noncompliant inactive wells with *Directive 013* on April 1, 2015.

Q4.4. Are the exemption approvals that were previously approved by the AER still valid?

A4.4. The licensee is required to submit documentation showing the exemption as soon as possible. The AER will review each exemption on a case-by-case basis and decide whether the exemption

conditions have been met. Requests must be submitted to iwcp@aer.ca. Until the exemption is reviewed and acknowledged by the AER, the well will remain subject to current *Directive 013* requirements and compliance assurance process.

Q4.5. How do I calculate my company's IWCP annual target quota?

A4.5. The IWCP annual target quota is calculated as follows:

$$\text{Annual Target Quota} = \frac{\text{All noncompliant wells as of April 1 of the current year}}{\text{Number of years left in IWCP}}$$

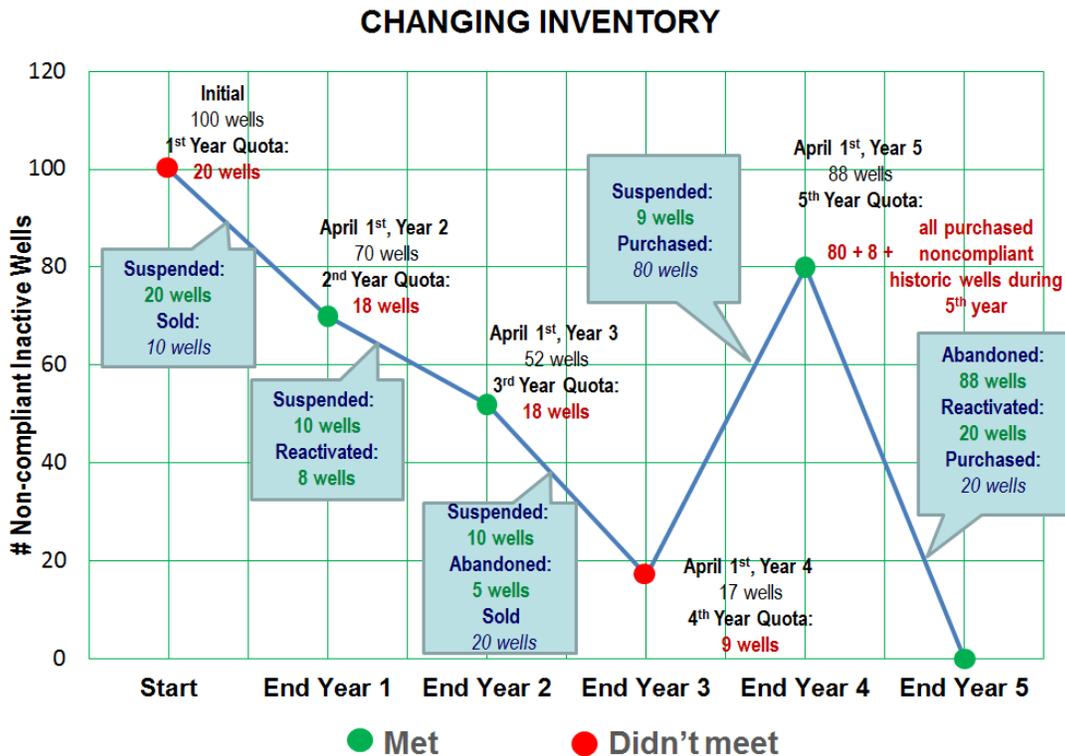
Note: Selling, purchasing, or transferring wells (compliant or noncompliant) does not contribute to meeting a yearly quota. Also, the fifth-year inventory includes Annual Target Quota wells and all noncompliant IWCP wells acquired by the licensee during the last two years of the program.

Q4.6. Why does selling wells not contribute to meeting the IWCP annual target quota?

A4.6. The IWCP goal is to address the backlog of noncompliant inactive wells under *Directive 013* with a 20 per cent reduction industry-wide per year. Selling wells creates a risk of all wells being left with a few licensees in the last year of the IWCP, and potentially becoming orphan.

Q4.7. Would it be possible to get the slide from the IWCP information sessions explaining potential scenarios for the IWCP annual target quotas?

A4.7. Here is the slide:



Q4.8. I am confused by what is meant by April 1st of each year. Could you clarify?

A4.8. This means that you have to meet your IWCP annual target quota by March 31 of each year; on April 1 the new quota begins. This is based on the AER fiscal year.

Q4.9. Once a licensee has been given the IWCP annual target quota, if there are circumstances preventing them from bringing those wells into compliance, will the AER be giving any consideration to that?

A4.9. No, the program is designed to be flexible from the beginning. The licensee can choose what wells they want to work on each year. If the licensee fails to meet the annual target quota, the AER will issue a response in accordance with Compliance Assurance Program.

Q4.10. If the licensee brings as many wells as possible into compliance with Directive 013 before April 1, 2015, would that contribute to meeting 20 per cent for each year?

A4.10. It will reduce an overall inventory of wells that will be marked as IWCP and as a result will reduce the number of wells in each year's IWCP annual target quota.

Q4.11. Will we be able to submit an extension request if we are unable to meet the IWCP annual target quota?

A4.11. No. Please refer to *Bulletin 2014-19*:

Under the AER's Compliance Assurance Program, self-disclosures or extensions pertaining to IWCP and *Directive 013* requirements will not be accepted.

Q4.12. Will the Inactive Well Compliance Program introduce any new suspension requirements for inactive wells?

A4.12. No, the Inactive Well Compliance Program is designed to address the backlog of noncompliant wells with *Directive 013*. The actual suspension requirements are in *Directive 013*.

Q4.13. When we look at the Inactive Well Licence List there are wells that are marked as part of the program but they show as compliant. Is that because of the changes made to *Directive 013*?

A4.13. Yes, due to the following three changes made to *Directive 013* compliance logic on the Inactive Well Licence List, a number of wells became compliant on April 1, 2015:

- Suspension deadline—The suspension deadline date is now 12 months after the inactive status date. The well is required to be suspended and reported on DDS in accordance with *Directive 013* by the suspension deadline. For example, if the well becomes inactive on April 21, 2015, the suspension deadline date for completing the suspension work and reporting it on DDS is April 21, 2016.
- Inspection deadline—The deadline for inspections will be calculated based on the inspection due date in DDS and moved from a specific date to the end of that calendar year. For example, if the medium-risk well is suspended on April 1, 2015, using a packer and tubing plug, the inspection frequency is three years and the inspection due date would be April 1, 2018. The inspection deadline date will be December 31, 2018 (see figure 8).
- Reactivation criteria—For a well to attain active status and be reactivated on DDS, it must report volumetric activity for at least one hour per month for three consecutive months.

These wells were included in the IWCP inventory because these changes were not introduced until April 1, 2015, which didn't provide enough time to all licensees for the operational planning of *Directive 013* activities.

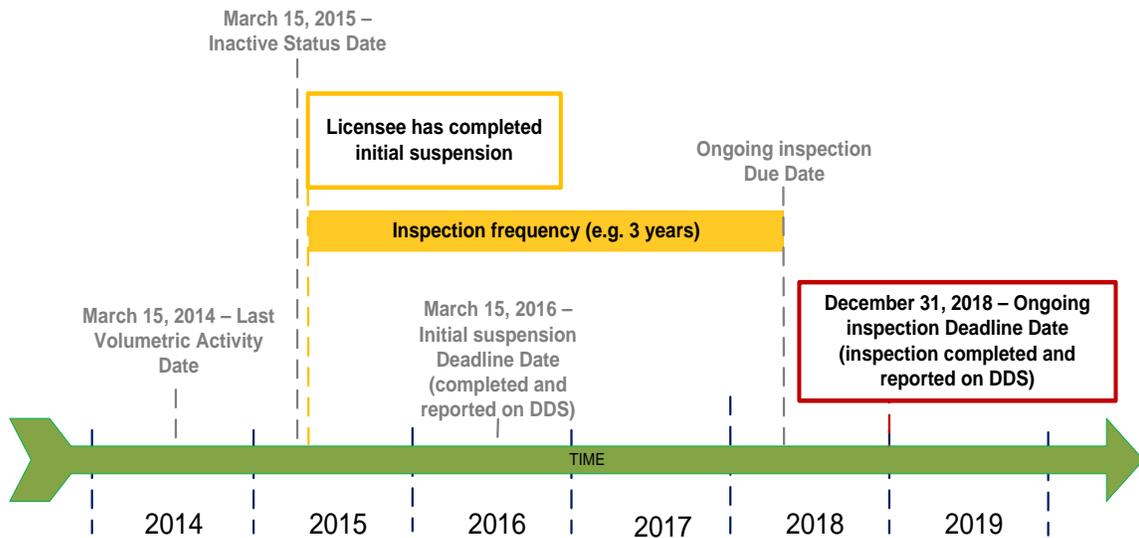


Figure 8: Calculating ongoing inspection deadlines

Q4.14. Will wells marked as IWCP and compliant on April 1, 2015, count toward our first year IWCP annual target quota?

A4.14. No, the IWCP annual target quota is always calculated based on the amount of IWCP noncompliant wells as of April 1 of each year divided by the number of years left in the program.

Q4.15. If more than 20 per cent of a licensee’s total IWCP inventory is made to be compliant this year, will that decrease the quota required in future years?

A4.15. Not directly. The IWCP annual target quota for the next year is calculated from the number of IWCP noncompliant wells on April 1 of each program year divided by the number of years remaining in the program.

Q4.16. Where can I find the IWCP annual target quotas and progress report?

A4.16. The IWCP annual target quotas and progress report can be downloaded from the DDS system and requires Microsoft Excel 2007 (or a more recent version). It can be found at AER > Reports > Licence > View/Download Inactive Well Licence List (see figure 9).

Note: This report is updated every six months during the first weeks of October and April of each IWCP year.

Alberta Energy Regulator
Digital Data Submission (DDS) System

AER HOME | DDS HELP | HIDE MENU

User: []
[Log off]

Expand All
Digital Data Submission Home
AER
Applications
Audit
Field Surveillance
Incidents
Notifications
Reports
Base Groundwater Protection
Gas Processing Plant
Integrated Application Registry (IAR) QI
Light Duty
Licence
View/Download Inactive Well Licen
Submissions History
Submissions
DDS Administration

Inactive Well Licence List

This list contains all inactive well licences and related compliance information as defined by *Directive 013: Suspension Requirements for Wells*.

Effective April 1, 2015, the following changes were made to the inactive well licence list in order to improve industry operational effectiveness and efficiency with regards to *Directive 013* requirements:

- The inactive well licence list is automated and updated daily. To download the list, Microsoft Excel 2007, or more recent version, is required.
- The "Forecasted inactive well licence list" was added under a separate tab in the inactive well licence list. It contains all the well licences that are not inactive as per *Directive 013* and includes the following:
 - wells that are classified as critical sour and have not reported any volumetric activity for three consecutive months, and
 - all other wells that have not reported any volumetric activity for six consecutive months.
- Suspension deadline** - The suspension deadline date is now 12 months after the inactive status date. The well is required to be suspended and reported on the Digital Data Submission System (DDS) in accordance with *Directive 013* by the suspension deadline. For example, if the well becomes inactive on April 21, 2015, then the suspension deadline date for completing the suspension work and reporting it on DDS is April 21, 2016.
- Inspection deadline** - The deadline for inspections will be calculated based on the inspection due date in DDS and moved from a specific date to the end of that calendar year. For example, if the medium-risk well is suspended on April 1, 2015, using a packer and tubing plug, the inspection frequency is three years and the inspection due date would be April 1, 2018. The inspection deadline date will be December 31, 2018.
- Reactivation criteria** - For a well to attain active status and to be reactivated on DDS, it must report volumetric activity for at least one hour per month for three consecutive months.

These changes will be reflected in a revised version of *Directive 013*.

[Download Inactive Well Licence List](#)

Annual target quotas and progress report on the Inactive Well Compliance Program (IWCP, *Bulletin 2014-19*) can be downloaded from the following link:
[Download IWCP annual target quotas and progress report](#)

Please direct general inquiries to AER Well Operations at (403) 297-5290 or by e-mail at WellOperations@aer.ca
Please forward all inquiries about the Inactive Well Compliance Program (*Bulletin 2014-19*) to IWCP@aer.ca

Figure 9: Locating the IWCP annual target quotas and progress report on DDS

Q4.17. We have completed our target quota for this year. Can we get a formal confirmation letter from the AER that we are compliant with IWCP requirements for this year?

A4.17. Compliance confirmation letters will not be issued during the program year. All licensees that have met their IWCP target quotas for the year will be receiving a *Compliance Achieved* letter from the AER distributed between April 1 and April 30 of each IWCP year.

Q4.18. We have completed our target quota for this year; however, before the March 31 deadline we sold some of our compliant wells to another licensee. How can we obtain credit for the work that was conducted?

A4.18. The Inactive Well Compliance Program was designed to exclude wells that were transferred, purchased, or sold. On April 1 of each IWCP year, the AER will conduct a review and calculate the compliance status not including wells that were transferred, purchased, or sold during the year. When a licensee is found to be noncompliant with meeting the IWCP annual target quota, the AER will issue a Notice of Noncompliance – Failure to Comply letter, indicating the number of outstanding wells to meet the target quota. To include compliant wells that were sold or transferred out after the work was completed for the current IWCP year, the licensee must submit the following information in response to the AER “failure to comply” letter:

- A copy of the AER inactive well licence list dated April 1 of the current calendar year with the following requirements:
 - The list must contain ONLY the wells that have been transferred/sold and that are to be taken into consideration to fulfil the IWCP annual target quota. Abandoned or reactivated

wells must be added to the list along with the well licence number, UWI, surface location, licensee name, and BA code of the company the wells were transferred or sold to.

- All wells on the list must comply with *Directive 013* requirements on April 1 of the current calendar year.
 - The *Directive 013* compliance status on the AER Inactive Well Licence List on April 1 of the current calendar year must indicate “Compliant” for all wells that were not abandoned or reactivated.
- b. Copies of the DDS submission confirmation for each well (i.e., the DDS well licence suspension report, the DDS well licence reactivation report, or the DDS well licence abandonment report, whichever applies)
 - c. The current wellbore schematic for each well on the list
 - d. Well site photos (at least one photo per well site) for each well individually, verifying surface compliance in accordance with *Directive 013*. The photo must include the well licence number, the UWI, and the date on which it was taken.

The information must be submitted to iwcp@aer.ca with the subject line indicating “Compliant IWCP Year [x] transferred wells.” Once the information has been reviewed, the licensee will receive an AER response indicating whether the request was granted.

5. General inquiries

Q5.1. How often are the FAQs updated?

A5.1. FAQs are updated regularly, based on the number of questions pending to be added to it. The history of updates can be tracked through the table of updates in section 6 of this document.

Q5.2. How many Q&A sessions is the AER providing, and is it an ongoing activity?

A5.2. Yes, Q&A sessions are an ongoing activity and are designed to address any questions related to *Directive 013*, the Inactive Well Compliance Program, the Inactive Well Licence List, and suspension submissions on the AER’s Digital Data Submission (DDS) system. Q&A sessions are offered monthly in the online and in-house formats. For details, please visit the *Directive 013* page on the AER website.

Q5.3. What if after attending the Q&A session I have another question, do I have to attend another Q&A session?

A5.3. Yes, you are required to register and attend one of the next available sessions to ask any questions related to *Directive 013*, the Inactive Well Compliance Program, the Inactive Well Licence List, or suspension submissions on the DDS system.

To improve the effectiveness and efficiency of the compliance assurance and surveillance efforts, effective March 5, 2015, the AER is no longer responding to *Directive 013* and Inactive Well Compliance Program questions by e-mail or by telephone. All questions related to *Directive 013*, the Inactive Well Compliance Program, the Inactive Well Licence List, and suspension submissions on the AER Digital Data Submission system must be addressed through the ongoing preregistered information sessions.

Before attending one of the sessions, please read *Directive 013*, *Bulletin 2014-19*, and related FAQs and make sure that your questions are not already answered in one of these documents. For details, please visit the *Directive 013* page on the AER website.

Q5.4. How do I cancel my registration for Q&A session?

A5.4. Please contact Eventbrite for the specific instructions (www.eventbrite.ca), or visit the following link: <http://help.eventbrite.com/customer/portal/articles/581556-how-to-cancel-a-registration-for-a-free-event>.

6. Table of Updates

Release date	Sections updated	Questions added/edited
Feb. 24, 2015	N/A (original release)	N/A
May 28, 2015	1 <i>Directive 013: Suspension Requirements for Wells</i>	1, 11, 14, 35, 36, 37, 38, 39
	2 The Inactive Well Licence List	1, 6, 20, 23
	3 The Digital Data Submission System	16
	4 The Inactive Well Compliance Program (<i>Bulletin 2014-19</i>)	13, 14, 15, 16
	5 General inquiries	1, 2, 3, 4
March 11, 2016	1 <i>Directive 013: Suspension Requirements for Wells</i>	3, 4, 7, 9, 11, 21, 22, 27, 28, 32, 36, 40, 41, 42
	2 The Inactive Well Licence List	1, 2, 3, 12, 13, 14, 15, 20, 21, 23,
	3 The Digital Data Submission System	8, 15, 17
	4 The Inactive Well Compliance Program (<i>Bulletin 2014-19</i>)	2, 13, 16, 17, 18
	5 General inquiries	2, 3