

# AER Drilling Waste Notification Requirements

8 October, 2013

The AER Provincial Environment Team would like to address concerns regarding the notification of drilling waste disposal activities to the AER. A provincial review of Drilling Activity Notifications has been conducted with a specific focus on the drilling waste notification requirements. The review of Drilling Activity Notifications indicated that not all of the required information for drilling waste activities is being submitted for a significant number of notifications. The AER Provincial Environment Team would like to clarify and reiterate the notification requirements for drilling waste activities as outlined in *Directive 050: Drilling Waste Management*.

## **Directive 050: Drilling Waste Management May 2, 2012**

### **21.3 Pre-disposal Notification Requirements**

- 3) Licensees must electronically submit drilling waste disposal notification information in conjunction with the drilling activity notification through the ERCB Digital Data Submission (DDS) systems, Field Surveillance Inspection System (FIS) Drilling Activity Notification form.
- 4) Licensees must enter the following information about the proposed drilling waste disposal activities on the Drilling Activity Notification Form:
  - *drilling fluid/mud type(s);*
  - *proposed drilling waste disposal method(s) and location(s);*
  - *location of remote sump or biodegradation site, if one is to be used; and*
  - *environmental contractor information.*

*Changes to the drilling activity notification record are allowed on the DDS system up to 48 hours from the Drilling Activity Start Date. Licensees should consider the drilling waste disposal before this time passes and update the Drilling Activity Notification with appropriate information. Any changes to the disposal plan after 48 hours from the Drilling Activity Start Date must be clearly documented and retained in the well file.*

inquiries 1-855-297-8311  
24-hour  
emergency 1-800-222-6514

The AER Provincial Environment Team recognizes that the DDS notification form does not always allow the user to input the necessary data depending on the type of drilling activity or alternative disposal practice. Until such time as the notification form can be updated, the AER would like licensees to utilize the **comments section** within the DDS Drilling Activity Notification, to submit the required information that may not fit within the existing data entry points. Please ensure that all mud types, disposal methods, locations or alternative practices are being described. Existing data entry points, such as method, mud type, remote sump location, and disposal location must be completed where possible and appropriate. If the waste is going to a waste management facility, the location for the facility can be entered and the comments tab can be used to indicate which waste management facility the waste is being sent to.

The AER will continue to educate and work with industry to ensure that the notification requirements are being met. However, after a period of time we will be continuing the process of reviewing drilling waste notifications and issue noncompliance's as per *Directive 019: Compliance Assurance* where data submission requirements are not completed as per *Directive 050: Drilling Waste Management*.

If you have further questions please contact the appropriate AER field centre.

*Directive 050* is available from on the AER website, [www.aer.ca](http://www.aer.ca). Printed copies of the directive can be purchased from AER Information Product Services, Suite 1000, 250 – 5 Street SW; telephone: 403-297-8311 or 1-855-297-8311 (toll free); fax: 403-297-7040; e-mail: [infoservices@aer.ca](mailto:infoservices@ aer.ca).