

Bulletin 2009-13

April 28, 2009

Waiver of Open-Hole Well Logging Requirements

This bulletin is to remind industry that a well licence must be obtained prior to requesting a logging waiver. The well licence number and unique well identifier (UWI) must be provided at the time of the logging waiver request. The Energy Resources Conservation Board (ERCB) recognizes that this can be problematic in areas of high drilling density and over the next few months will review options for area-based waivers to streamline the process.

In some instances, licensees are requesting large numbers of logging waivers prior to obtaining well licences but then fail to license all the wells or license some wells at different locations. Consequently, ERCB efforts to ensure compliance with the *Oil and Gas Conservation Regulations* and to ensure that compliance enforcement is not mistakenly undertaken are needlessly complicated and resource intensive.

The rationale for obtaining a well licence prior to requesting a logging waiver includes the following:

- It is a requirement of the *Oil and Gas Conservation Regulations*, Section 11.140, which, in summary, states
 - that the **licensee** [emphasis added] shall, before completion, abandonment or suspension of drilling operations at a well, take an acceptable log to measure the resistivity and spontaneous potential of the strata from the total depth of the well to the base of surface casing, and record all pertinent data, and
 - that the Board may, on application by the licensee, allow substitution or grant relief.

For complete logging requirements and precise wording, please refer to *Oil and Gas Conservation Regulations*, Section 11.140, and to ERCB *Directive 043: Well Logging Requirements—Surface Casing Interval*.

- It reduces ERCB time and effort associated with reviewing and managing logging waiver requests for wells that are never licensed or are drilled at a different location.
- It improves logging waiver request turnaround time. The ERCB endeavours to provide 24-hour turnaround on logging waiver requests.
- The ERCB is planning to automate the waiver request, waiver approval, and logging compliance processes, which will require a well licence number and UWI.

Please direct inquiries regarding this bulletin by e-mail to LoggingWaivers@ercb.ca.

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