

Bulletin 2020-20

September 17, 2020

Nonroutine Commingled Abandonment

Any abandonment activity that varies from the requirements given in [Directive 020: Well Abandonment](#), is considered “nonroutine” and must be approved by the AER before work can be started (section 1.4). Variances are most commonly needed due to wellbore design, operational issues (such as equipment stuck in the hole), and new technology. Requests for nonroutine abandonment of [commingled wells](#) have not generally been approved, primarily because the risks were not understood well enough.

In 2019 we undertook a study of those risks, which resulted in our publishing [Open File Report 2019-06: A Risk-Based Methodology for Commingled Well Abandonment – Southeastern Alberta Gas Field Case Study](#). Of particular note in the study is figure 1, a preliminary assessment tool that assigns levels of risk to geological intervals. In April 2019 we initiated [a pilot under the Area-Based Closure program](#) that began approving nonroutine abandonment of commingled wells meeting certain criteria.

We have ended the pilot and will now review requests for nonroutine abandonment of commingled wells from all regulated parties. Currently, we will only consider pools that

- are located below the base of groundwater protection and
- include intervals classified as low risk (green) in [Open File Report 2019-06](#).

We continue to accept nonroutine requests and evaluate the potential for the abandonment of commingled pools that fall within the higher-risk zones. Further information will be provided as the evaluation is completed

To apply, we encourage you to use the new form [Commingled Well Abandonment Variance Request](#) now available on our website, [Regulating Development > Rules and Directives > AER Forms > Directive Forms > Directive 020 Forms](#).

If you have any questions, please contact [WellOperations@aer.ca](mailto:WellOperations@ aer.ca).