

# Directive 040 (released September 2021) Stakeholder Feedback and AER Response



Stakeholder Feedback – Issue	Stakeholder	AER Response
The changes should be highlighted in the draft directive (not just at the beginning of the document but on every point that has been changed. This is currently not done) It is hard to tell whether it is a new requirement or just a rewritten old requirement. This is making reviewing the document difficult and very time consuming.	CNRL	We will consider this for future stakeholder feedback periods.
Section 4.7, page 32: Although the Directive 040 makes distinction for the use of DFITs in tight or unconventional reservoirs (i.e., section 4.7) vs. oil sands (caprock – i.e., section 5), the updated TRG.PAS file DFIT submission does not distinguish between them. The TRG.PAS file submission for DFITs shows a “mandatory requirement” for the submission of such items as calculated flow capacity and calculated skin factor which are not priority parameters assessed from DFITs on caprock formations.	CNRL	Fixing this requires system changes that we cannot accommodate right now, but we will begin the process of having these changes made.

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<p>Section 4.7, page 32: “A minifrac test is conducted without proppant prior to the main hydraulic fracture treatment. These tests are performed by injecting small volumes (typically less than 15 m<sup>3</sup>) of fluid (most often water) at low rates. The injection is often conducted over less than 15 minutes with the fall-off completed over approximately a two-week period”</p> <p>Would like to clarify that 2-week fall-off is not a criteria that will be required.</p>	Ovintiv	Two weeks is not a requirement; it is a best practice.
<p>Section 2.4, page 5, and section 3.6, page 19: Requirement to submit all fluid analyses (even ones taken on the same day) is very onerous and doesn’t seem necessary.</p>	CNRL	The requirements mentioned are from the <i>Oil and Gas Conservation Rules</i> and are not within the scope of this update. See section 5 of appendix A, “Well Fluid Analysis Requirements,” for more information.