

Directive 044

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Requirements for Surveillance of Water Production in Hydrocarbon Wells Completed Above the Base of Groundwater Protection

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1 Introduction

This directive details requirements around surveillance of water production and processes related to all hydrocarbon wells with completions above the base of groundwater protection (BGWP). The term “hydrocarbon well” refers to conventional and unconventional wells (including oil sands wells) that are not part of a water recycle program.

2 What's New in This Edition?

As part of contributions towards the Government of Alberta’s *Red Tape Reduction Act*, the AER has made amendments to reduce the prescription of surveillance, sampling, and analysis of water production from hydrocarbon wells above the base of groundwater protection; reduce interactions between the licensee and the AER; provide increased flexibility to the AER around its response to notifications; and provide continued assurance that nonsaline groundwater is protected.

3 Surveillance of Water Production

3.1 Identification of Wells Exceeding the Prescribed Trigger Volume

- 1) Well licensees must perform ongoing self-audits on all hydrocarbon wells that have completions above the BGWP. While monthly production records are a principal source of information for these self-audits, companies are expected to have in place internal management systems that will accelerate the exchange of accurate water production information between the field and head office to enable the timely identification of wells that produce water in excess of 30 m³/month.
- 2) If through a self-audit, a hydrocarbon well with completions above the BGWP is identified as having water production equal to or greater than 30 m³/month at any time, the well licensee must submit within 30 days a notification to the AER at Auth.Geology@aer.ca. The notification must include disclosure of threshold exceedance, specified water volume produced, and the unique well identifier (UWI).
- 3) Following the review of the notification provided by the licensee, the AER may require further licensee action, which may include groundwater testing and mitigation plans. The licensee must take the actions directed by the AER and notify the AER in writing upon their completion.

3.2 Resolution of Production Accounting Errors

The AER will not accept the following as evidence of, or reason for, a production accounting error:

- truck tickets
- arguments that third-party accounting providers are responsible.

Well licensees are responsible for ensuring that water production for their wells is reported accurately and that any errors in reported water production volumes are corrected.

4 Record Keeping

Well licensees are reminded to ensure that all well completion records required for perforations and other completion activities under *Directive 059: Well Drilling and Completion Data Filing Requirements* are complete and up-to-date at all times.