

# Top Five Most Common Noncompliances in Ten Inspection Categories



This summary has been developed in response to industry's request for timely and relevant information on compliance. It can be used by industry members to gain a better understanding of Alberta Energy Regulator (AER) requirements.

This summary focuses specifically on operational issues related to drilling, well servicing, oil and gas operations, pipelines, well sites, drilling waste, oilfield waste management facilities, and oil sands and coal mines.

**January 1, 2017 – June 30, 2017**

<b>Drilling</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR, 8.129(1); <i>Directive 036</i> , appendix 5 – Shop servicing, testing and storage documents not available at the rig.	2
2)	OGCR, 8.129(1); <i>Directive 036</i> , appendix 5 – BOP certification has expired.	2
3)	PLA, 20(1) and 47(1)(a) – No Approval or Disposition associated with disturbance or use of Public Land.	2
4)	OGCR, 8.129(1); <i>Directive 036</i> , 11.1.4 – STICK diagram does not contain all the required information.	1
5)	OGCR, 8.129(1); <i>Directive 036</i> , 7.2 – Low pressure and/or high pressure tests not conducted on all required components and/or casing strings.	1

<b>Gas Facility</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR, 8.150(4) – Facility not maintained in a clean condition.	59
2)	<i>Directive 039</i> , (3); <i>Directive 060</i> , 8.3(2)(b) – Dehydrator Engineering and Operations Sheet not done, incomplete and/or not posted.	28
3)	OGCR, 14.140; <i>Directive 017</i> , 2.5.1 and 2.5.2.1 – Meter not calibrated/proved since installation, following repairs or calibration/proving expired.	21
4)	OGCR, 6.020(3), (6); <i>Directive 055</i> , 3.8 – Conspicuous identification sign not posted at the primary entrance to the well or facility.	17
5)	PLA 54(1)(a); PLAR, 21(1)(h) – Waste material, debris, refuse or garbage accumulating on site.	14

<b>Pipeline</b>		<b>Estimated Number of Occurrences</b>
1)	<i>Pipeline Rules</i> 7(3)(b); CSA Z662-15, 10.5.1.1(a) – Licensee is not able to demonstrate that procedures in the manuals have been implemented, or it is not operating and maintaining its pipeline systems in accordance with documented procedures.	72
2)	<i>Pipeline Rules</i> , 82(1) – Pipeline is not discontinued, abandoned, or returned to service after 12 months of no active flowing service.	53
3)	<i>Pipeline Rules</i> , 82(2) – Pipeline is not abandoned or discontinued in accordance with the requirements of <i>Directive 056</i> .	33
4)	<i>Pipeline Rules</i> , 54(1) and 56 – For metallic pipelines, licensee internal corrosion mitigation records inaccurate or incomplete.	31
5)	<i>Pipeline Rules</i> , 7(1), (3)(a) – Licensee has not updated the manuals as necessary to ensure correct content.	27

<b>Well Site</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR, 3.020(1); <i>Directive 013</i> , table 1 – All wellhead valves are not chained and locked or valve handles not removed.	78
2)	OGCR, 6.020(3), (5), (7); <i>Directive 055</i> – Improper identification sign.	75
3)	OGCR, 8.150(4) – Well not maintained in a clean condition.	73
4)	OGCR, 3.020(3); <i>Directive 013</i> , table 1 – All outlets (except surface casing vents) not bull plugged or blind flanged with needle valves.	45
5)	OGCR, 6.100 and 7.050(3) – No or inadequate surface casing vent.	36

<b>Drilling Waste</b>		<b>Estimated Number of Occurrences</b>
1)	<i>Directive 050</i> , 6.2(7), 6.4(14), and 8.2(5)(b) – Drilling waste storage system is not secured to prevent public or wildlife from entering it.	2
2)	OGCR, 8.150(4) – Facility not maintained in a clean condition.	2
3)	<i>Directive 050</i> , 21.3(3) – Required notification information not submitted through the AER Digital Data Submission System.	2
4)	<i>Directive 050</i> , 6.4(14) and 8.2(5)(b) – Remote storage site does not have proper signage.	2
5)	<i>Directive 050</i> , 6.2(11) – Storage system not physically closed within 18 months of rig release of first well that contributed drilling waste.	1

<b>Oil Facility</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR, 8.150(4) – Facility not maintained in a clean condition.	72
2)	OGCR, 8.030(2); <i>Directive 055</i> , 12 – Aboveground/underground tank(s) out of service do not meet the requirements.	34
3)	OGCR, 6.020(3),(6); <i>Directive 055</i> , 3.8 – Conspicuous identification sign not posted at the primary entrance to the well or facility.	22
4)	OGCR, 8.030(2); <i>Directive 055</i> , 5.3 – Secondary containment not designed, constructed, sized, and maintained as required.	22
5)	OGCR, 14.040; <i>Directive 017</i> , 2.5.1 and 2.5.2.1 – Meter not calibrated/proved since installation, following repairs or calibration/proving expired.	14

<b>Well Service</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR, 8.129(1); <i>Directive 037</i> , 320(6) – Accumulator gauge inaccurate or unavailable.	2
2)	OGCR, 3.062; <i>Directive 083</i> , 8(29) – Hydraulic fracturing pressure test notification late or did not occur.	2
3)	OGCR, 8.129(1); <i>Directive 037</i> , 1045(56) – BOP's inadequately heated.	1
4)	OGCR, 8.129(1); <i>Directive 037</i> , 260 – BOP components not pressure tested.	1
5)	OGCR, 8.129(1); <i>Directive 037</i> , 235 – Fluid by-passing through BOP controls or pressure dropped below 8400 KPA after function test with pump off.	1

<b>Waste Facility</b>		<b>Estimated Number of Occurrences</b>
1)	OGCR 7.001, 7.003, and 8.150(3)(a)-(c), (e)-(f); <i>Directive 058</i> , 2.1(2) – Waste Management Approval operational requirements not met.	6
2)	<i>Directive 058</i> , 11.3(2) and 11.6(3) – Odour emissions other than H <sub>2</sub> S at an Oilfield Waste Management Facility.	5
3)	WMR, 47–56, 58; WA, 142(1)(e) – Construction, drilling, maintenance, servicing, monitoring and well specification requirements do not meet the WMR requirements.	4

Waste Facility		Estimated Number of Occurrences
4)	OGCR, 6.028(8)–(13); Schedule 12 – No or improper warning symbol posted adjacent to all entrances to the developed area of wells and facilities.	3
5)	Directive 058, 5.1 and 5.2; Directive 047 – Waste facility does not accurately record on Petrinex incoming and outgoing waste streams to ensure waste materials are accounted for and disposed of appropriately.	2

Oil Sands Mine		Estimated Number of Occurrences
1)	EPEA, 110(1), (2) – Failure to report a release as required.	2
2)	EPEA 4.2.2 – The approval holder did not manage industrial wastewater and industrial runoff from the plant as described in the application.	1
3)	EPEA 2.1.1.1 and 4.1.36(b) – Cylinder Gas Audit test failed.	1
4)	EPEA, 227(e) – Plan/Proposal conditions not met.	1
5)	N/A	N/A

Coal Mine		Estimated Number of Occurrences
1)	EPEA, 227(e) – Soil Management program conditions not met.	1
2)	WA, 142(1)(e) – The activity does not meet the Siltation and Erosion Control requirements.	1
3)	EPEA, 227(e) – Storage conditions not met.	1
4)	EPEA, 227(e) – Monitoring wells not locked/protected/repared as required.	1
5)	EPEA, 227(e) – Site and design requirements not met.	1

## Inspection Details by Category

Inspection Category	Noncompliant	Satisfactory	Total	Noncompliance Rate (%)
Drilling	15	80	95	16
Gas facility	234	596	830	28
Pipeline	251	693	944	27
Well site	394	1578	1972	20
Drilling waste	11	36	47	23
Oil facility	225	783	1008	22
Well service	9	53	62	15
Waste facility	23	32	55	42
Oil sands mine	5	63	68	7
Coal mine	5	16	21	24
<b>Total</b>	<b>1172</b>	<b>3930</b>	<b>5102</b>	<b>23</b>