

Bulletin 2016-33

December 20, 2016

Amendments to *Directive 013: Suspension Requirements for Wells*

The purpose of *Directive 013: Suspension Requirements for Wells* (*Directive 013*) is to maintain the long-term integrity of a well in order to protect public safety and the environment.

Suspension is a step in the life-cycle management of wells that comes before abandonment and reclamation certification. It ensures that an inactive well is in a safe state. The *Directive 013* changes are expected to enhance regulatory compliance with well suspension requirements without compromising effective regulation of inactive well integrity or environmental protection. The revisions are intended to identify all inactive wells regulated under *Directive 013* and move them into suspension or abandonment states.

The following revisions to *Directive 013* will be in effect December 20, 2016:

- The method by which compliance deadlines are calculated in section 2.1 is changed to provide more efficient and integrated regional approaches to managing inactive wells:
 - Suspension deadline—the suspension deadline date is to be 12 months after the inactive-status date.
 - Inspection deadline—the deadline for inspections will be calculated based on the inspection due date in the AER’s Digital Data Submission System (DDS). All inspection deadlines will be moved from a specific date to the end of that calendar year. For example, an inspection deadline date of July 13, 2016, would be moved to December 31, 2016.
- The requirements for changing a high-risk well to medium or low risk are to be included in section 2.2 to clarify an existing process.
- For inactive cavern wells, the licensee would submit a nonroutine application to the AER for the suspension of the well and cavern (section 3.2).
- Suspension requirements are amended to provide consistency between well risk types and to align with AER *Directive 020: Well Abandonment* requirements:
 - For downhole well suspension, nonsaline water or inhibited (noncorrosive) fluid is to be used in the wellbore, and the top two metres of the wellbore must be filled with a nonfreezing fluid (sections 3.1.1, 3.2.1, and 3.3.1).

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- Pressure testing of low-risk type 1 wells is not required for the purpose of initial suspension nor at the time of ongoing inspections (section 3.1.1).
- Changes in reactivation criteria are provided in section 4 to align with operational practices for low productivity producing wells and for intermittently used injection wells.
 - For a well to attain active status and to be reactivated on DDS, it would report volumetric activity for at least one hour per month for three consecutive months.
 - Pressure testing casing or tubing for the reactivation of a well is not required if the initial well suspension was completed less than 12 months prior to reactivation.
- Unclear or conflicting definitions to be clarified:
 - The critical sour well definition from *Directive 056: Energy Development Applications and Schedules* is used (section 1.2).
 - The H₂S-level discrepancy between low- and medium-risk well definitions (section 3.1) is eliminated.
 - “Noncritical sour cased wells” is clarified to mean “cased-hole wells that are not critical sour” for low-risk wells (section 3.1).
 - All low-risk wells inactive for more than 10 years are to be moved to the medium-risk well category (section 3.2).

The inactive-well licence list has been available to all stakeholders on the *Directive 013* page of the AER website since March 1, 2016. It includes all the inactive wells in accordance with *Directive 013*, and it is automatically updated daily.

Directive 013 is available on the AER website, www.aer.ca. Printed copies of the directive can be purchased from AER Information Product Services, Suite 1000, 250 – 5 Street SW; telephone: 403-297-8311 or 1-855-297-8311 (toll free); fax: 403-297-7040; e-mail: infoservices@aer.ca.

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