



ERCB Monthly Enforcement Action Summary

March 2011

ENERGY RESOURCES CONSERVATION BOARD
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High Risk Compliance Category Statistics				
ERCB	Compliance Category	March 2011		
		Initial Audits/ Inspections	Number of High Risk Noncompliance	Compliance Rate with High Risk Noncompliance
Applications Branch				
Facilities Applications Group Audit Section	Participant Involvement	36	2	94%
	Facilities Technical	13	1	92%
	Pipelines/Pipeline Installations Technical	15	0	100%
	Wells Technical	30	1	97%
Resources Applications Group Enforcement & Surveillance Section	Commingling	n/a	1	n/a
Subtotal		94	5	95%
Field Surveillance and Operations Branch				
Emergency Management Group	General ERP Requirements	n/a	1	n/a
Field Operations Group	Drilling Operations	42	4	90%
	Well Servicing	27	1	96%
	Oil Facilities	242	5	98%
	Gas Facilities	262	1	99.6%
	Pipelines	151	19	87%
	Drilling Waste	12	2	83%
	Well Site Inspections	299	13	96%
	Waste Management	14	0	100%
Subtotal		1049	46	96%
Geology, Environmental Science, and Economics Branch				
Reserves and Pore-Space Management Group Oil Reserves and Allowables Section	Oil Overproduction	418	4	99%
Subtotal		418	4	99%
Total Audit/Inspections High Risk		1561	55	96.5%

High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	97837 Resources Ltd.	Field Operations/ Oil Facilities	Gas being vented, not burned, where it could be. 24-hour emergency number fails to initiate immediate action.	March 29, 2011	15-08-050-11W5 Brazeau County	Operations suspended. Licensee posted the updated 24- hour emergency number. Require a plan to address the noncompliance and prevent future occurrences. Compliance not yet achieved.
2	Alberta Oilsands Inc.	Field Operations/ Pipelines	Corrosion internal. There is no documented monitoring or mitigation program in place and/or company is not following program.	March 11, 2011	16-24-049-27W4 Leduc County	Operations were not suspended as the pipeline was already suspended at the time of the inspection. Licensee repaired the pipeline and installed valves to isolate part of the pipeline. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
3	Angle Energy Inc.	Field Operations/ Pipelines	Noncompliant with other ERCB requirements – Emission controls were unsuitable to prevent H ₂ S from being vented.	March 17, 2010	04-07-031-27W4 Red Deer County	Operations were not suspended as the licensee immediately corrected the noncompliance. Licensee set up new operating procedures to remove fluids during pigging operations. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

If you require further information, contact the ERCB Customer Contact Centre by telephone at 1-855-297-8311 (toll free) or 403-297-8311 or by e-mail to Inquiries@ercb.ca.

High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
4	Apache Canada Ltd.	Field Operations/ Pipelines	<p>Discontinued pipeline: not left in safe condition.</p> <p>No operations and maintenance procedures manual or not followed.</p> <p>There is no documented monitoring or mitigation program in place and/or company is not following program.</p>	March 28, 2011	<p>10-03-039-10W4</p> <p>County of Paintearth</p>	<p>Operations suspended.</p> <p>Licensee completed training on its Pipeline Integrity Manual.</p> <p>Licensee created a site specific procedure to deal with the temporary suspension of pipelines.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
5	Arriva Energy Inc.	Field Operations/ Well Site Inspections	<p>No knockout drum or flare separator where required.</p> <p>Venting practices not conducted in accordance with the requirements.</p>	March 18, 2011	<p>09-30-038-06W5</p> <p>Clearwater County</p>	<p>Operations suspended.</p> <p>Licensee implemented procedures to review all applicable regulations and develop a detailed job specific plan before commencing operations.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
6	Crew Energy Inc.	Field Operations/ Drilling Waste	Failure to obtain landowner approval for off-site drilling waste disposal.	March 18, 2011	13-14-016-10W4 Cypress County	<p>Operations were not suspended as the incident occurred prior to the inspection.</p> <p>Licensee will review and approve documents of the area before disposal activities.</p> <p>Licensee sampled the soil.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
7	Daylight Energy Ltd.	Reserves and Pore- Space Management/ Oil Overproduction	Failure to retire oil overproduction.	March 2, 2011	02/16-01-048-10W5/0 (production string) Brazeau County	<p>Licensee confirmed in writing that the well has been shut in and will remain shut in until all overproduction is retired.</p> <p>ERCB directed the licensee to develop and implement a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
8	Glencoe Resources Ltd.	Reserves and Pore- Space Management/ Oil Overproduction	Failure to retire oil overproduction.	March 31, 2011	00/16-32-041-25W4/0 (production string) Lacombe County	<p>Licensee confirmed in writing that the well has been shut in and will remain shut in until all overproduction is retired.</p> <p>ERCB directed the licensee to develop and implement a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
9	Grizzly Oil Sands ULC	Facilities Applications/ Wells Technical	Failure to acquire the rights to the intended formation(s).	March 18, 2011	04-02-084-11W4 Regional Municipality of Wood Buffalo	Licence(s) not cancelled or suspended as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
10	Harvest Operations Corp.	Field Operations/ Oil Facilities	Single wall underground tank not tested in the last 3 years.	March 10, 2011	02-19-037-07W4 Special Area 4	Operations were not suspended as the licensee emptied the tank and would have it integrity tested within 24 hours. Licensee integrity tested the tank. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
11	Midway Energy Ltd.	Facilities Applications/ Participant Involvement	Failure to disclose to the ERCB any outstanding public/industry objections/concerns, whether they are received prior to or after filing the application or whether the party is inside or outside the minimum contact radius of personal consultation and notification.	March 29, 2011	13-06-034-03W5 Mountain View County	Licence(s) not cancelled or suspended as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
12	Nuvista Energy Ltd.	Field Operations/ Pipelines	Cathodic protection not installed within one year of service/operation.	March 30, 2011	12-19-042-01W4 M.D. of Wainwright	Operations suspended. Licensee repaired the pipeline and installed cathodic protection. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
13	Pipeline Management Inc.	Field Operations/ Pipelines	Cathodic protection system not operational or not installed.	March 14, 2011	06-16-017-12W4 County of Newell	Operations were not suspended as the licensee immediately took the line out of service. Licensee removed this line from their licence. Licensee cleaned up the area and took the contaminated soil to the landfill. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
14	Sand Hills Energy Inc.	Field Operations/ Drilling Waste	Noncompliant with other ERCB requirement. Disposal method not conducted correctly as outlined in <i>Directive 050: Drilling Waste Management</i> .	March 23, 2011	02-26-055-15W4 County of Two Hills	Operations suspended. Licensee cleaned up the area and sampled the soil. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance not yet achieved.

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High Risk Enforcement Action (HREA)¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
15	Shoreline Oil & Gas Ltd.	Facilities Applications/ Participant Involvement	Incomplete public and/or industry personal consultation and notification prior to filing the application.	March 29, 2011	08-01-078-11W6 Saddle Hills County	Licence(s) not cancelled or suspended as the noncompliance was promptly corrected. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
16	Signalta Resources Limited	Field Operations/ Pipelines	No operations and maintenance procedures manual or not followed. Internal corrosion control – no records in corrosive environment. Internal corrosion control – no monitoring and mitigation in corrosive environment. Pressure control devices or pressure relief device installations unsatisfactory.	March 3, 2011	14-32-050-13W4 County of Minburn	Operations were not suspended as a short-term suspension in extreme cold weather would increase the risk to the public and the environment. The licensee had 30 days to implement mitigative measures; failure to do so would result in suspension of operations. Licensee will review and update its Operations and Maintenance Manual. Licensee will review the operational status of its pipelines monthly. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
17	Skana Exploration Ltd.	Resources Applications/ Commingling	Improper use of decision tree (Figure 3.4).	March 23, 2011	10-08-034-04W5 Mountain View County	<p>Licensee confirmed in writing that it had addressed the noncompliance and shut in the well; the well will remain shut in until it obtains the requisite approval.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
18	Surge Energy Inc.	Reserves and Pore- Space Management/ Oil Overproduction	Failure to retire oil overproduction.	March 31, 2011	02/03-13-040-04W4/0 (production string) M.D. of Provost	<p>Licensee confirmed in writing that the well has been shut in and will remain shut in until all overproduction is retired.</p> <p>Licensee directed to develop and implement a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance not yet achieved.</p>
19	Twin Butte Energy Ltd.	Facilities Applications/ Facilities Technical	Failure to acquire the necessary facility licence prior to commencing site preparation, construction, and/or operation.	March 29, 2011	15-20-056-03W4 County of St. Paul	<p>Licensee/operations not suspended as there is no evidence of operational noncompliance.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>

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High Risk Enforcement Action (HREA) ¹						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
20	Vero Energy Inc.	Field Operations/ Pipelines	No operations and maintenance procedures manual or not followed. Cathodic protection system not operational or not installed.	March 2, 2011	14-04-061-07W5 10-03-061-07W5 County of Barrhead	Operations were not suspended as short-term suspension in extreme cold weather would increase the risk to the public and the environment. Licensee will reiterate all required procedures and documents to staff. Licensee implemented procedures to install cathodic protection. Licensee provided a plan to address the noncompliance and prevent future occurrences. Compliance achieved.
21	Water Solutionz Enterprises Inc.	Emergency Management Group/General ERP Requirements	Failure to have a corporate-level ERP.	March 18, 2011	01-04-033-05W4 Special Area 4	Operations at the site had been previously suspended due to other unrelated findings of noncompliance. Licensee required to develop a plan to address the noncompliance and prevent future occurrences. Licensee failed to comply.
22	Wolf Coulee Resources Inc.	Reserves and Pore- Space Management/ Oil Overproduction	Failure to retire oil overproduction.	March 2, 2011	00/13-13-013-19W4/2 (production string) M.D. of Taber	Licensee confirmed in writing that the well has been shut in and will remain shut in until all overproduction is retired. Licensee directed to develop and implement a plan to address the noncompliance and prevent future occurrences. Compliance achieved.

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High Risk Enforcement Action (Persistent Noncompliance) ²						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
	None					

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High Risk Enforcement Action (Demonstrated Disregard) ³						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
	None					

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High Risk Enforcement Action (Failure to Comply) ⁴						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
	None					

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Low Risk Enforcement Action – (Global Refer) ⁵						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
1	Graybeard Energy Ltd.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	March 2, 2011	N/A – Against Licensee	<p>Global Refer status.</p> <p>Issuance of Miscellaneous Order No. MISC 2011-11.</p> <p>Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</p> <p>Graybeard Energy Ltd. failed to comply. Closure Order No. C 1243, Abandonment Orders No. AD 2011-21, AD 2011-22, AD 2011-23, AD 2011-24, and Closure/Abandonment Order No. AD 2011-25 were subsequently issued.</p> <p>Graybeard Energy Ltd. failed to comply. The ERCB is evaluating further actions.</p>
2	Padriv Development Ltd.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	March 2, 2011	N/A – Against Licensee	<p>Global Refer status.</p> <p>Issuance of Miscellaneous Order No. MISC 2011-9.</p> <p>Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</p> <p>Padriv Development Ltd. failed to comply. Closure Order No. C 1242, Abandonment Order No. AD 2011-26, and Closure/Abandonment</p>

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Low Risk Enforcement Action – (Global Refer) ⁵						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
						Order No. AD 2011-27 were subsequently issued. Padriv Development Ltd. failed to comply. The ERCB is evaluating further actions.
3	Pyramid Petroleum Inc.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	March 7, 2011	Well Licence: 08-34-013-14W4 M.D. of Taber	This is an escalation of a previous enforcement action reported on January 26, 2011. Global Refer status. Issuance of Abandonment Order No. AD 2011-20. Abandonment of the well licence. Licensee required to pay the security deposit; provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences; and meet with the ERCB to review its noncompliance history and action plan. Pyramid Petroleum Inc. failed to comply. The ERCB is evaluating further actions.

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Low Risk Enforcement Action – (Global Refer) ⁵						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
4	Saguaro Energy Corp.	Corporate Enforcement/ Environmental and Public Safety	Failure to pay abandonment costs.	March 29, 2011	07-04-001-11W4 County of Warner	Global Refer status. Issuance of Abandonment Costs Order No. ACO 2011-05. Licensee required to pay the invoiced costs plus a 25 per cent penalty against the invoiced costs. Saguaro Energy Corp. failed to comply. The ERCB has registered a Writ of Enforcement against Saguaro Energy Corp. with the Personal Property Registry for its debt.
5	XGEN Ventures Inc.	Corporate Enforcement/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	March 2, 2011	N/A – Against Licensee	Global Refer status. Issuance of Miscellaneous Order No. MISC 2011-12. Licensee required to pay the security deposit and provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences. XGEN Ventures Inc. failed to comply. Closure Orders No. C 1244 and C 1245, Abandonment Orders No. AD 2011-29, AD 2011-30, AD 2011-31, and Closure/Abandonment Order No. AD 2011-32 were subsequently issued. XGEN Ventures Inc. failed to comply. The ERCB is evaluating further actions.

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Legislative/Regulatory Enforcement Action ⁶						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow up
	None					

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Endnotes

¹ **Directive 019—High Risk Enforcement Action (HREA)**

In accordance with *Directive 019: ERCB Compliance Assurance*, the ERCB initiates an HREA against a licensee if it identifies a high risk noncompliant event(s). To address an HREA, the licensee must: immediately correct and address the high risk noncompliant event(s) identified by the ERCB; if necessary, suspend operations, either partially or fully and when safe to do so, to remove the existing or potential impact or hazard resulting in the noncompliance (any suspension of operations must not occur if it will increase the impact or risk to either the public or the environment; compliance must be achieved prior to start-up); develop and implement a written action plan within 60 calendar days or in the time specified by the ERCB group (a licensee may also be required to submit the written action plan and meet with the ERCB group to discuss both the action plan and the licensee's compliance history); and notify the ERCB group that it has corrected and addressed the high risk noncompliance. The ERCB may also apply or require one or more of the following: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension of operations (until the licensee corrects/addressed the noncompliance); suspension and/or cancellation of the permit, licence, or approval.

² **Directive 019—High Risk Enforcement Action (HREA) (Persistent Noncompliance)**

In accordance with *Directive 019: ERCB Compliance Assurance*, the ERCB initiates an HREA (Persistent Noncompliance) against a licensee with an unacceptable rate, ratio, percentage or number of noncompliant events, either in the same or in different compliance categories. To address an HREA (Persistent Noncompliance), the licensee must: immediately correct and address the high risk noncompliant event(s) identified by the ERCB; if necessary, suspend operations, either partially or fully and when safe to do so, to remove the existing or potential impact or hazard resulting in the noncompliance (any suspension of operations must not occur if it will increase the impact or risk to either the public or the environment; compliance must be achieved prior to start-up); develop, implement, and submit a written action plan within 30 calendar days or in the time specified by the ERCB group (the action plan should address the root causes of any previous noncompliance(s) and detail how the licensee will prevent future noncompliant events); meet with the ERCB group to discuss the high risk noncompliant event(s), the licensee's compliance history, and the written action plan; and notify the ERCB group that it has corrected and addressed the high risk noncompliance(s). The ERCB may also apply or require one or more of the following: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension of operations (until the licensee corrects and addresses the noncompliance(s)); suspension and/or cancellation of the permit, licence, or approval.

A licensee must operate in compliance for a period of 60 calendar days (or in a time specified by the ERCB) in the same compliance category before achieving overall compliance.

³ **Directive 019—High Risk Enforcement Action (HREA) (Demonstrated Disregard)**

In accordance with *Directive 019: ERCB Compliance Assurance*, the ERCB initiates an HREA (Demonstrated Disregard) against a licensee if the licensee knows or should know about a high risk noncompliant event(s) but does not act to correct and address the noncompliance(s). The ERCB assesses demonstrated disregard on a case-by-case basis. To address an HREA (Demonstrated Disregard), the licensee must: immediately correct and address the high risk noncompliant event(s) identified by the ERCB; if necessary, suspend operations, either partially or fully and when safe to do so, to remove the existing or potential impact/hazard resulting in the noncompliance(s) (any suspension of operations must not occur if it will increase impact or risk to either the public or the environment; compliance must be achieved prior to start-up); develop, implement, and submit a written action plan (the action plan should address the root cause(s) of the noncompliant event(s) and detail how the licensee will prevent future noncompliant events); meet with the ERCB group to discuss the high risk noncompliant event(s), the licensee's compliance history, and the written action plan; and notify the ERCB group that it has corrected and addressed the high risk noncompliance(s). The ERCB may also apply or require one or more of the following: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension of operations (until the licensee corrects and addresses the noncompliance(s)); suspension and/or cancellation of the permit, licence, or approval; issuance of an Order (Miscellaneous, Closure, or Abandonment); "Refer" status (focused or global).

A licensee must operate in compliance for a period of 180 calendar days (or in the time specified by the ERCB) in the same compliance category before achieving overall compliance.

⁴ **Directive 019—High Risk Enforcement Action (HREA) (Failure to Comply)**

In accordance with *Directive 019: ERCB Compliance Assurance*, the ERCB initiates an HREA (Failure to Comply) against a licensee if it failed to comply with the direction of the ERCB in an ERCB Notice of High Risk Noncompliance, HREA, HREA (Persistent Noncompliance), HREA (Demonstrated Disregard), or a previous HREA (Failure to Comply). To address an HREA (Failure to Comply), the licensee must: immediately correct and address the high risk noncompliant event(s) identified by the ERCB; if necessary, suspend operations, either partially or fully and when safe to do so, to remove the existing or potential impact or hazard resulting in the noncompliance(s) (any suspension of operations must not occur if it will increase the impact or risk to the public or the environment; compliance must be achieved prior to start-up); develop, implement, and submit a written action plan (the action plan should address the root cause(s) of the noncompliant event(s) and detail how the licensee will prevent future noncompliant events); meet with the ERCB group to discuss the high risk noncompliant event(s), the licensee's compliance history, and the written action plan; and notify the ERCB group that it has corrected and addressed the high risk noncompliance(s). The ERCB may also apply or require one or more of the following: noncompliance fees; self-audit or inspections; increased audits or inspections; partial or full suspension of operations (until the licensee corrects and addresses the noncompliance); suspension and/or cancellation of permit, licensee, or approval; issuance of an Order (Miscellaneous, Closure, or Abandonment); "Refer" status (focused or global).

A licensee must operate in compliance for a period of 180 calendar days (or in the time specified by the ERCB) in the same compliance category before achieving overall compliance.

⁵ **Directive 019—Low Risk Enforcement Action (LREA) (Global Refer)** In accordance with *Directive 019: ERCB Compliance Assurance*, the ERCB initiates an LREA (Global Refer) against a licensee who failed to comply with the direction of the ERCB in a Notice of Low Risk Noncompliance. To address an LREA, the licensee must: immediately correct and address the low risk noncompliant event(s) identified by the ERCB; notify the ERCB group that it has addressed the low risk noncompliant event(s); and develop, implement, and submit written action plan within 30 calendar days or in the time specified by the ERCB group; and meet with the ERCB group to discuss the low risk noncompliant event(s), the licensee's compliance history, or the written action plan. The ERCB may also apply or require one or more of the following: noncompliance fees, partial or full suspension, suspension and/or cancellation of permit, licence, or approval; issuance of an Order (Miscellaneous, Closure, or Abandonment); "Refer" status (focused or global).

⁶ **Legislative/Regulatory Enforcement Action**

The ERCB initiates a Legislative/Regulatory Enforcement Action for noncompliance with ERCB requirements that fall outside the administration of *Directive 019: Compliance Assurance*. The ERCB relies upon its statutory and regulatory authority to initiate the enforcement action against the licensee by applying a Refer status against the licensee and possibly issuing an Order (Closure, Miscellaneous, and Abandonment). The ERCB generally initiates these enforcement actions because of a mineral or surface lease expiry, an environmental and public safety concern, or a failure to demonstrate the right to the purpose of the wellbore, the right to access the surface, and working interest ownership in the property.

Refer Status—Focused or Global

This status indicates a licensee's inability or unwillingness to comply. If applied against a licensee, the ERCB will consider the status when deciding to approve or deny future and pending applications and may apply conditions for continued operation.

For further information on ERCB Enforcement Actions, see *Directive 019: Compliance Assurance* or contact the ERCB Compliance Assurance Section at compliancecoordination@ercb.ca.

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