

# 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 – December 31, 2015**

<b>Drilling</b>		<b>Estimated Number of Occurrences</b>
1)	1.1.4.2 – STICK diagram does not contain all the required information.	9
2)	19.7.2 – Fluids not properly contained (spilled on-lease).	5
3)	16.3.1 – H <sub>2</sub> S warning sign not posted as required.	3
4)	6.1.1 – Accumulator pressure dropped below 8,400 KPA after function test.	2
5)	11.3.1.2 – Flow checks not recorded in the drilling logbook.	2

<b>Gas Facility</b>		<b>Estimated Number of Occurrences</b>
1)	3.2.5.5 – Facility not maintained in a clean condition.	134
2)	1.8.5.55 – Aboveground/underground tank(s) out of service and do not meet the requirements.	41
3)	50.11.1 – Weeds not actively being managed.	31
4)	1.1.5.30 – Meter not calibrated or calibration expired.	30
5)	50.5.1 – Erosion on site not being controlled.	29

<b>Pipeline</b>		<b>Estimated Number of Occurrences</b>
1)	5.1.20.1 – 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.	102
2)	8.1.15.1 – Pipeline is not abandoned or discontinued in accordance with the requirements of <i>Directive 056</i> .	70
3)	8.1.10.1 – Pipeline is not discontinued, abandoned, or returned to service after 12 months of no active flowing service.	66
4)	5.1.15.1 – Licensee has not updated the manuals as necessary (specified in <i>Pipeline Rules 7[1]</i> ) to ensure correct content.	49
5)	5.5.5.1 – Internal corrosion mitigation records/procedure issues.	45

<b>Well Site</b>		<b>Estimated Number of Occurrences</b>
1)	3.2.5.5 – Well not maintained in a clean condition.	229
2)	4.1.5.8 – All wellhead valves are not chained and locked or valve handles not removed.	173
3)	1.6.5.5 – Conspicuous identification sign not posted at the primary entrance to the well or facility.	122
4)	1.7.5.68 – No or inadequate surface casing vent.	86
5)	4.1.5.13 – All outlets (except surface casing vents) not bull plugged or blind flanged with needle valves.	80

<b>Drilling Waste</b>		<b>Estimated Number of Occurrences</b>
1)	2.2.3.1 – Drilling waste storage system is not secured to prevent public or wildlife from entering it.	9
2)	2.1.5.1 – Failure to maintain a minimum freeboard of 0.5 metres.	7
3)	2.1.6.1 – Facility not maintained in a clean condition.	6
4)	2.2.1.1 – Remote storage site does not have proper signage.	4
5)	2.1.7.1 – Storage system not physically closed within 18 months of rig release of first well that contributed drilling waste.	3

<b>Oil Facility</b>		<b>Estimated Number of Occurrences</b>
1)	3.2.5.5 – Facility not maintained in a clean condition.	246
2)	1.8.5.25 – Secondary containment not designed, constructed, sized, and maintained as required.	71
3)	1.6.5.5 – Conspicuous identification sign not posted at the primary entrance to the well or facility.	52
4)	50.11.1 – Weeds not actively being managed.	38
5)	1.6.5.10 – Improper identification sign.	38

<b>Well Service</b>		<b>Estimated Number of Occurrences</b>
1)	1.52.G1 – Three-year shop servicing not conducted.	4
2)	4.90.G1 – Diesel engine shut-off did not operate.	4
3)	99.1.1 – Hydraulic fracturing pressure test notification late.	4
4)	3.84.51 – BOP components not pressure tested.	3
5)	51.2.5 – Erosion control.	2

<b>Waste Facility</b>		<b>Estimated Number of Occurrences</b>
1)	3.1.2.1 – Odour emissions other than H <sub>2</sub> S at an Oilfield Waste Management Facility.	4
2)	1.1.6.1 – Flared/vented gas not reported to the Petrinex.	4
3)	1.1.7.1 – Fuel gas not reported to the Petrinex.	3
4)	1.3.1.1 – 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
5)	1.4.7.1 – Flare type equipment within 25m of source of ignitable vapour.	2

<b>Oil Sands Mine</b>		<b>Estimated Number of Occurrences</b>
1)	60.3.2.1 – Hazardous substance not stored properly.	<b>6</b>
2)	2.1.18.1 – Late notification of a reportable spill.	<b>6</b>
3)	99.1.1.1 – Spilled material not cleaned up, as required.	<b>5</b>
4)	2.2.2.1 – Failure to report any liquid spill, break in a vessel or fire that occurs on an oil sands site.	<b>4</b>
5)	99.1.1.1 – Processing facilities must be maintained in a clean condition.	<b>3</b>

<b>Coal Mine</b>		<b>Estimated Number of Occurrences</b>
1)	50.5.1 – Erosion on site is not being controlled.	<b>4</b>
2)	72.1.20.1 – Water is pooling on the crest of the dam due to improper drainage.	<b>3</b>
3)	61.6.2.1 – Storage approval conditions not met.	<b>2</b>
4)	50.11.1 – Weeds not actively being maintained.	<b>2</b>
5)	70.1.10.1 – Minimum flow not maintained below dam into natural watercourse.	<b>2</b>