

Summary of Stakeholder Feedback and ERCB Responses on the 2012 Draft *Directive 017*

Stakeholder Feedback – Issue	Stakeholder	ERCB Response
1.9 Measurement Schematics Requirements		
Test and proving taps on Schematic: This seems too detailed to put on the schematic.	Fairborne Energy	Rejected. The location of the taps relative to the meter is pertinent to see if requirements are met. The operator has the flexibility to show it any way they want, provided it is clearly marked on the legend.
<ol style="list-style-type: none"> 1.9.1 The Operator of Record may only be the reporter of production volumes, and it may not be possible for it to create and maintain schematics. The existing definition of Operator in <i>Directive 017</i> should be adhered to. 1.9.1 Facilities must be delineated on the measurement schematic. Change to “should be.” 1.9.2 The no-change confirmation requirement should be deleted. This would waste a lot of time. 1.9.3 Suggested implementation process is not necessary and should be deleted. Add to 1.9.4 the company doing the production reporting. 	Talisman	<ol style="list-style-type: none"> Accepted. Rejected. Facilities delineation is pertinent to see if requirements are met. Rejected. How else would we know if the schematic is up-to-date. We have made it more flexible to store this information so that it does not have to be on the schematic; it can be stored separately. Accepted. Accepted.
<ol style="list-style-type: none"> 1.9.1 Should remove the drawing update or no-change confirmation date record. Process Equipment: Gas scrubbers may either be optional or required, such as hydrocarbon scrubbers that reduce vent volumes. For example, gas scrubbers are optional, such as hydrocarbon scrubbers that reduce vent volumes. Identify underground or aboveground tanks (optional). How often must schematics be provided—annually as per required update frequency, or upon request? 	PennWest	<ol style="list-style-type: none"> Removed from schematic but must be kept elsewhere. Removed from schematic requirements. Rejected. It is needed for inspectors to see if there are underground tanks; default to aboveground. Clarified: Upon request.
<ol style="list-style-type: none"> Make some of the items optional. Well list should be allowed instead drawing them in. 	EnCana	<ol style="list-style-type: none"> Accepted for gas scrubbers, non-flow-changing headers, S&W sampling points, and tank capacity, but others are essential items. Added flexibility for the operator as to how things are shown.
<ol style="list-style-type: none"> Title Block: This requirement is very prescriptive. Allow the producer to choose where to maintain the information on the schematic. Flow Lines: It is unclear what the requirement is. If the requirement is to label those lines, the schematic will be extremely congested. 	Suncor	<ol style="list-style-type: none"> Accepted Clarified.

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<p>Replace the first paragraph of 1.9.1 (Measurement Schematics Requirements) with the following statement:</p> <p>“The Operator of Record on the PRA is responsible for the creation, confirmation, and revision of any measurement schematics. Measurement schematics must contain enough information such that it will accurately reflect all of the accounting flow streams. This is to ensure an accurate interpretation of physical flow for the configuration of accounting systems. Measurement schematics must include all sources, fuel, flare, and venting points, and dispositions by reporting product, including unique identifiers for each accounting measurement point. The measurement schematics must be used by operations and production accounting to ensure that the reported volumes are in compliance with the ERCB reporting and licensing requirements. The following items serve as a guideline and may be considered when developing measurement schematics for measurement, accounting and reporting purposes.”</p>	Cenovus	<p>This is also the desire of a few other IMG members not repeated here.</p> <p>Rejected, as it leaves it up to each operator to decide what is sufficient on the schematic. That is why we have had so many issues with erroneous measurement and reporting over the last two decades; this has resulted in many reworks on the monthly reporting.</p>
<p>1.9.2 The 5 days after month-end change submission requirement from the field to production accounting is too prescriptive; it should be driven by the producer's business process.</p>	Devon	<p>Changed to the following:</p> <p>“The producer sets their own deadline for submission before the Registry submission deadline.”</p>
<ol style="list-style-type: none"> 1. CAPPAs are concerned by the level of detail that would be required on the schematic as many of the items may be nice to have but would not be used on a regular basis by production accountants (PA). Examples include meter type, tank size, and UWIs—information that is available from other sources within the organization. 2. Our members agree that making these draft requirements into formal regulations will result in little regulatory benefit while requiring extensive resources from PA to implement. It is CAPPAs' opinion that the current reporting requirements outlined in <i>Directive 007</i> and <i>017</i> are clear and sufficient. 	CAPPAs	<ol style="list-style-type: none"> 1. Rejected. This level of detail is required by ERCB field and office staff to assess information on each facility as to what requirements apply or not; it is not just for PA use. These requirements will require the operators to look into their facilities and ensure that what is there physically matches what is on the schematic. Operators spend millions of dollars per year to rework their production numbers when they discover these errors. We see many benefits for everyone in getting things done right the first time. 2. There is no existing requirement regarding the level of detail required on a measurement schematic. Many times we have to ask for additional information from the operators to get these details for assessment for the field inspectors, EPAP, PA, investigators, or facility applications staff.

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1.10 Facility Delineation Requirements		
<ol style="list-style-type: none"> Add to 1st bullet an exception for batteries with prorated wells. Add a scenario with oil batteries that tie to the same GS. Add to 5.5.1 “Facility delineation in this case is determined by where the measured gas enters the oil battery relative to the oil battery gas measurement.” 	Talisman	<ol style="list-style-type: none"> Rejected. Prorated wells are part of the battery, not a receipt or disposition. Rejected. It is all measured production and have to be reported as a receipt at the gas gathering system according to existing reporting rules. Accepted.
<ol style="list-style-type: none"> Gas plant definition not consistent with <i>Directive 056</i>: According to <i>Directive 056</i>, the facility is only a plant if it has the stated equipment AND makes more than 2 m³/d of hydrocarbon liquid. What is the ECF, WGR, and LGR of those wells that are testing exempt as per the decision tree? Is it 1? 	Pennwest	<ol style="list-style-type: none"> Changed to match. Accounting details added.
Show “fuel” between facilities in Figures 6 & 7	EnCana	Accepted.
<ol style="list-style-type: none"> Add: “This is a common delineation example – others are possible but not fully detailed here.” At minimum a footnote should be added detailing that the EPAP responsibilities are the responsibility of the “operator of record”; ideally all instances would be revised to include the distinction between “operator” and “operator of record.” Section 6 Oil Battery Delivering To or Receiving From a Gas Plant on Same Site: One detail that should be added to this scenario is that of fuel that is used across both facilities but coming from a single source. 	Devon	<ol style="list-style-type: none"> Already in place. The “operator of record” has been changed to “operator” to clarify. Added to schematic.
7.4 Gas Multiwell Effluent Proration Batteries		
<ol style="list-style-type: none"> Add to definition of “Near measured” production: <p>“This effluent corrected production volume is then multiplied by the well’s water-gas ratio (WGR) to determine the estimated water production volumes WGR to determine water production volumes.”</p> 7.4.1.1 the word “zones” is confusing; maybe use “facility” or “battery.” Note 3: Keep symbols consistent. 7.4.1.2 The word “codified” is confusing. 7.4.1.2 Upstream should be “upstream or downstream.” 7.4.1.3 Add PRA codes. 7.4.1.3 Add “average” for test volumes. How to report exemptions? 	Talisman	<ol style="list-style-type: none"> Accepted. Rejected. It is needed for the decision tree to see if a new zone has been perforated. Accepted. Clarified. Rejected. Downstream pressure is not representative for well static pressure. Accepted. Accepted. Accepted.
<ol style="list-style-type: none"> What about load fluid in the decision tree? Pennwest would like to request clarification on whether or not the ERCB considers load fluid as a production fluid during the evaluation period or if the evaluation period starts after all load fluid is recovered? 	Pennwest	<ol style="list-style-type: none"> Added process to handle unrecovered load fluids. Added “after total recovery or 12 months, whichever comes first.”
The record-keeping list seems long, and some items may not have value.	ConocoPhillips	Accepted. Added “where applicable.”

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<ol style="list-style-type: none"> 1. Add grandfathering for existing effluent wells. 2. Load fluids recovery? 3. Accounting procedures should be developed. 	EnCana	<ol style="list-style-type: none"> 1. Already in place. 2. Same as Pennwest above. 3. Accounting details added.

Appendix 10

Gas Group Delineation Case 1: Recommend to show the calc for MD: $598.0 - 588.7 - (0.19878 \times 17.3) = 5.9$ (1.0%)	Fairborne Energy	Accepted.
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