

Summary of BitCan G&E Inc. Stakeholder Feedback and Reservoir Containment Team (RCT) Response on Technical Reports				
Section	Stakeholder Feedback - Issue	Possible Solution or Recommendation	Rationale to Support Solution or Recommendation	RCT Response
Section 4, Page 3	MOP=80%*depth*fracture gradient	In particular, by applying the MOP formula in a blanket fashion to all project applications significant potential resource plays are lost. There are several valuable yet unique projects, such as those at shallow depths or ones with caprock that differs from the current AER requirements, which should be given special consideration. In these instances AER should remain open to the science and willing to review detailed scientific and engineering studies presented by project applicants. If concerns or skepticism persist regarding the validity of the scientific studies then allowing for an experimental field pilot test is a prudent way to demonstrate how these unique situations can be operated as safely and responsibly as any "standard" project.	(1) The biggest advantage to use this formula is its simplicity in implementation. It allows for a streamlined review and an expedited decision making on a multitude of project applications. This subsequently frees up more time and resources which can then be allocated to investigate atypical situations. However, it is our view that this formula is not optimized. Neither is it obtained after detailed scientific research and engineering evaluations. Thus it cannot accurately reflect or anticipate the true in-situ responses.	The RCT is open to appropriate scale field testing with clear objectives where the operations can be performed in a safe manner. Applications would be reviewed on a case by case basis.
Section 5, all pages	AER's observations and concerns regarding the role of simulations are relevant. However many of them have already been addressed and adequately overcome by BitCan and others in the industry.	A re-examination of AER's position on the insignificance or unimportance of simulations would be worthwhile. We maintain that properly constructed simulations can provide vital information to AER and project owners.	See the attachment for more supporting evidences.	With respect to tensile failure, the RCT believes the MOP formula provides a more acceptable level of risk, considering the limitations of geomechanical modelling. Notwithstanding the limitations of modelling, the RCT believes that modelling is the only available method to assess shear failure.

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Section 6, all pages	AER's decision not to allow monitoring to play an important role in deciding a MOP should be re-considered.	In fact, simulations, continuous monitoring and continuous analysis or inversion of the observation data are three pillars the industry can rely on to safe-guard the caprock integrity.	<p>There are many instances where increased and improved monitoring and vigorous analysis of the monitored data has proven to be an effective method of mitigating increased risk incurred by an engineering activity. This includes airline industry, nuclear power industry, civil engineering projects and the like.</p> <p>See the attachment for more supporting evidences.</p>	The RCT agrees that simulation and continuous monitoring can play an important role in operating a SAGD scheme. Furthermore, the RCT believes that modelling should be updated using project monitoring results to validate modelling predictions and accuracy. However, the RCT does not believe that monitoring can be relied on to justify steam injection pressures that are greater than pressures determined by the MOP formula or shear modelling.