

Current Drilling and Production Regulations – CAPP Comments

| Section | Title | Text Body | Comments | Proposed New Text |
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| 1 (pg2) | Interpretation | formation flow test” means an operation (a) to induce the flow of formation fluids to the surface of a well to procure reservoir fluid samples and determine reservoir flow characteristics; or.. | Eliminate the ‘flow to surface’ prescriptive requirement | formation flow test” means an operation (a) to induce the flow of formation fluids of a well to procure reservoir fluid samples and determine reservoir flow characteristics; or.. |
| 1 (pg3) | Interpretation | “operator” means a person that holds an operating licence under paragraph 138(1)(a) of the Act and an authorization. (exploitant) | Is the use of ‘person’ consistent with that in the AMP Regulation? Should this be a different reference (i.e ‘legal entity and license holder) | |
| 1 (pg5) | Interpretation | “workover” means an operation on a completed well that requires removal of the Christmas tree or the tubing. (reconditionnement) | | The process of performing major maintenance or remedial treatments on a well |
| 11 b (pg12) | Well Approval | a well data acquisition program that allows for the collection of sufficient cutting and fluid samples, logs, conventional cores, sidewall cores, pressure measurements and formation flow tests, analyses and surveys to enable a comprehensive geophysical, geological and reservoir evaluation to be made. | Overly Prescriptive | a well data acquisition program that allows for a comprehensive geophysical, geological and reservoir evaluation to be made. |
| 19 f (pg14) | Management System | any drilling or well operation is conducted in a manner that maintains full control of the well at all times; | Suggest to use the phrase “good engineering practices”. While we agree with the intent of the existing wording it can leave to ambiguity in interpretation. | any drilling or well operation is planned and conducted in a manner that uses good engineering practices to maintain well control throughout the entire well life cycle; |

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| 25 a (pg 16) | | all wells, installations, equipment and facilities are designed, constructed, tested, maintained and operated to prevent incidents and waste under the maximum load conditions that may be reasonably anticipated during any operation; | We agree with the intent, but does the use of the phrase 'maximum' and 'during any operation' create an area of ambiguity and differences in interpretation?. i.e, a surface casing should not be designed and tested to take maximum production loads | all wells, installations, equipment and facilities are designed, constructed, tested, maintained and operated to prevent incidents and waste under the maximum load conditions that it may be reasonably exposed to during any operation; |
| 25 b (pg 16) | | a comprehensive inspection that includes a non-destructive examination of critical joints and structural members of an installation and any critical drilling or production equipment is made at an interval to ensure continued safe operation of the installation or equipment and in any case, at least once in every five-year period; and | Needs to be re-written to allow for CBM approach. Suggest to use good engineering practices or OEM, Certifying Authority etc. | |
| 46 a (pg21) | | it is completed in a safe manner and allows for maximum recovery; | Is the phrase 'maximum recovery' needed in this provision? That is an ambiguous term. | it is completed in a safe manner and consistent with the resource development plan |
| 58 (pg 25) | | The operator shall ensure that, on the abandonment of a well, the seafloor is cleared of any material or equipment that might interfere with other commercial uses of the sea. | Consider putting depth intervals to avoid dispensations and unnecessary and time consuming discussions with regulator | The operator shall ensure that, on the abandonment of a well in water depths less than greater than 1500m well or.. |

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| 65 c (pg 27) | | if there is reason to believe that infill drilling or implementation of an enhanced recovery scheme might result in increased recovery from a pool or field, studies on these methods are carried out and submitted to the Board. | Infill drilling is prescriptive and does not include other ideas for IOR. Suggest this be reworded to have continued focus on enhanced recovery and optimal recovery | |
| 70 3 (pg 28/29) | | Under the direction of the installation manager, the support craft crew shall keep the craft in close proximity to the installation, maintain open communication channels with the installation and be prepared to conduct rescue operations during any activity or condition that presents an increased level of risk to the safety of personnel or the installation. | This text seems ambiguous. Operations during any activity or condition that presents an increased level of risk to the safety of personnel or the installation. This has to be focused on the role of the safety craft in close proximity and not a general comment about increased level of risk. This is a contradictory statement. | |