



# ERCB Monthly Enforcement Action Summary

December 2011

**ENERGY RESOURCES CONSERVATION BOARD**  
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Suite 1000, 250 – 5 Street SW  
Calgary, Alberta  
T2P 0R4

Telephone: 403-297-8311  
Toll free: 1-855-297-8311  
E-mail: [infoservices@ercb.ca](mailto:infoservices@ercb.ca)  
Website: [www.ercb.ca](http://www.ercb.ca)

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## Introduction

This is an Energy Resources Conservation Board (ERCB) published report that is created four months after the enforcement action to gather all Information on licensees that have had a High Risk Enforcement Action, Low Risk Enforcement Action Global REFER or Low Risk Enforcement Action Legislative/Regulatory Enforcement Action issued against them.

ERCB Monthly Enforcement Action Summary*				
ERCB	Compliance Category	December 2011		
		Number of High Risk Enforcement Actions	Number of High Risk Enforcement Actions (Failure to Comply)	Number of Low Risk Enforcement Actions (Global REFER)
<b>Applications Branch</b>				
Facilities Applications Group Audit Section	Facilities Technical	2	0	0
	Wells Technical	2	0	0
<b>Subtotal</b>		<b>4</b>	<b>0</b>	<b>0</b>
<b>Field Surveillance and Operations Branch</b>				
Field Operations Group	Gas Facilities	1	0	0
	Oil Facilities	3	0	0
	Pipelines	6	0	0
	Well Site Inspections	1	1	0
Liability Management Group	Noncompliance with Liability Management Program Requirements	0	0	6
Technical Operations Group	Glycol Dehydrator Benzene Emissions	1	0	0
<b>Subtotal</b>		<b>12</b>	<b>1</b>	<b>6</b>
<b>Total High Risk Enforcement Actions issued</b>		<b>16</b>	<b>1</b>	<b>0</b>
<b>Total Low Risk (Global REFER) Enforcement Actions issued</b>		<b>0</b>	<b>0</b>	<b>6</b>

\*This table only summarizes the compliance categories for which there were monthly enforcement actions issued.





High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	Advantage Oil & Gas Ltd.	Facilities Applications/ Facilities Technical	Failure to acquire the necessary facility licence prior to commencing site preparation, construction, and/or operation.	December 20, 2011	16-36-037-19W4  County of Stettler	Operations were not suspended as there was no existing or potential impact or hazard to the public safety, environmental protection, resource conservation, and/or stakeholder confidence  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
2	Advantage Oil & Gas Ltd.	Field Operations/ Pipelines	Discontinued pipeline. Not left in safe condition.	December 7, 2011	07-31-037-18W4  County of Stettler	Operations were not suspended as the pipeline was suspended at the time of inspection.  Licensee decommissioned the pipeline.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
3	Bonavista Energy Corporation	Field Operations/ Oil Facilities	Noncompliant with other High Risk ERCB requirements. (Venting must not result in H <sub>2</sub> S odours outside the lease boundary.)	December 1, 2011	09-11-034-05W5  Mountain View County	Operations were not suspended as the noncompliance was immediately corrected.  Licensee made adjustments to the flare system.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
4	Canadian Natural Resources Limited	Field Operations/ Pipelines	<p>Failure/hit - proper procedures were not followed.</p> <p>Operator is aware of a reportable release but neglects to report it.</p>	December 1, 2011	<p>08-31-080-22W4</p> <p>M.D. of Opportunity</p>	<p>Operations suspended.</p> <p>Licensee repaired the pipeline.</p> <p>Licensee met with staff to discuss safety and regulatory compliance with an emphasis on ground disturbance.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p> <p>Compliance achieved.</p>
5	ConocoPhillips Canada Resources Corp.	Field Operations/ Gas Facilities	Acid gas not metered.	December 6, 2011	<p>06-19-073-08W6</p> <p>County of Grande Prairie</p>	<p>Operations were not suspended as there was no existing or potential impact or hazard to the public safety, environmental protection, resource conservation, and/or stakeholder confidence.</p> <p>Licensee will replace the meter. ERCB has extended the deadline to replace the meter to June 30, 2012, due to complexity of the changes required.</p> <p>Licensee provided a plan to address the noncompliance and prevent future occurrences.</p>

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
6	Exshaw Oil Corp.	Field Operations/ Oil Facilities	H <sub>2</sub> S emissions at any facility that receives gas containing more than 10 mol/kmol of H <sub>2</sub> S.	December 16, 2011	06-03-078-07W6  Saddle Hills County	Operations suspended.  Licensee immediately replaced the thief hatches on the tanks.  Licensee installed a new vapour recovery unit.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
7	Fairborne Energy Ltd.	Field Operations/ Pipelines	Hand excavation: Mechanical excavation takes place within 5 m of existing pipeline prior to hand exposure.	December 7, 2011	13-28-042-23W4  County of Ponoka	Operations suspended.  Licensee reviewed the incident with all employees and contractors who conduct ground disturbance.  Licensee will review and identify all underground "T"s or dead-end piping systems.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
8	Nexen Inc.	Facilities Applications/ Wells Technical	Failure to acquire the rights to the intended formation(s).	December 7, 2011	13-28-085-06W4 08-29-085-06W4  Regional Municipality of Wood Buffalo	Licences cancelled.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
9	Pengrowth Energy Corporation	Facilities Applications/ Facilities Technical	Failure to acquire the necessary facility licence prior to commencing site preparation, construction and/ or operation.	December 20, 2011	13-32-034-20W4  County of Stettler	Operations were not suspended as there was no existing or potential impact or hazard to the public safety, environmental protection, resource conservation, and/or stakeholder confidence  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
10	Pengrowth Energy Corporation	Field Operations/ Pipelines	Poor construction practices resulting in failure within one year's service/operation.	December 14, 2011	03-13-037-01W4  M.D. of Provost	Operations suspended.  Licensee set up training sessions to increase awareness of material limitations and proper installation procedures.  Licensee updated its <i>Pipeline Design and Material Requirements</i> document.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
11	Pengrowth Energy Corporation	Technical Operations/ Glycol Dehydrator Benzene Emissions	Individual dehydrator(s) or site dehydrator benzene emissions over the limits.	December 19, 2011	01-30-065-10W5  M.D. of Big Lakes	Operations were not suspended as this was a review of 2010 operations.  Licensee met with ERCB.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
12	Petro Energy Corp.	Facilities Applications/ Wells Technical	No rights to substance(s) for the intended formation(s).	December 16, 2011	08-03-081-24W4  M.D. of Opportunity	Licence was not cancelled as the noncompliance has been appropriately addressed.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
13	Signalta Resources Limited	Field Operations/ Pipelines	Operating and maintenance procedures manual not followed.	December 9, 2011	10-07-049-13W4  Yellowhead County	Operations suspended.  Licensee updated its <i>Pipeline Operations and Maintenance Manual</i> .  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
14	Talisman Energy Inc.	Field Operations/ Pipelines	Failure/hit - proper procedures were not followed.	December 19, 2011	06-01-043-03W4  M.D. of Wainwright	Operations suspended.  Licensee retrained personnel involved in the incident on ground disturbance related procedures.  Licensee updated their communication process.  Licensee is required to provide a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.
15	Tallgrass Energy Corp.	Field Operations/ Oil Facilities	H <sub>2</sub> S emissions at any facility that receives gas containing more than 10 mol/kmol of H <sub>2</sub> S.	December 9, 2011	04-32-038-06W4  M.D. of Provost	Operations suspended.  Licensee replaced the thief hatch on the tank.  Licensee is required to provide a plan to address the noncompliance and prevent future occurrences.  Compliance achieved.

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High Risk Enforcement Action (HREA) <sup>1</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
16	Tourmaline Oil Corp	Field Operations/ Well Site Inspections	Flame type equipment within 25 metres of a well, oil storage tank, or other source of ignitable vapour.	December 20, 2011	08-06-051-23W5  Yellowhead County	<p>Operations were not suspended as there was no existing or potential impact or hazard to public safety, environmental protection, resource conservation, and/or stakeholder confidence.</p> <p>Licensee will review Safety Alert with personnel.</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 (Persistent Noncompliance) <sup>2</sup>						
#	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) <sup>3</sup>						
#	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)<sup>4</sup>

#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Response
1	Beau Energy Inc.	Field Operations/ Well Site Inspections	Other – Failure to submit an action plan.	December 7, 2011	10-21-030-06W4  Special Area 3	Operations were not suspended as the well was shut-in at the time of inspection.  Licensee must meet with ERCB.  Licensee provided a plan to address the noncompliance and prevent future occurrences.  Compliance not achieved.

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Low Risk Enforcement Action – (Global Refer) <sup>5</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
1	Canadian Rockies Petroleum Corp.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 12, 2011	15 well locations:  Clear Hills County M.D. of Big Lakes M.D. of Greenview  Pipeline locations: 11-33-075-14W5 07-33-075-14W5 12-03-076-14W5 08-04-076-14W5 09-32-075-14W5  M.D. of Big Lakes	Global Refer status.  Issuance of Closure Order No. C 1276.  Suspension and closure of well and pipeline licences.  Licensee required to <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul> Canadian Rockies Petroleum Corp. failed to comply. Abandonment Orders No. AD 2012-5, AD 2012-6, AD 2012-7, AD 2012-8, AD 2012-9, and Closure/Abandonment Order No. AD 2012-10 were subsequently issued.  Canadian Rockies Petroleum Corp. failed to comply. The ERCB is evaluating further actions.
2	Cougar Oil and Gas Canada Inc.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 15, 2011	N/A – Against Licensee	Global Refer status.  Issuance of Miscellaneous Order No. MISC 2011-95.  Licensee required to <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul>

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Low Risk Enforcement Action – (Global Refer) <sup>5</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
						<p>Cougar Oil and Gas Canada Inc. failed to comply. Closure Orders No. C 2012-12 and C 2012-13 were subsequently issued.</p> <p>Cougar Oil and Gas Canada Inc. paid its security deposit in full and provided a written explanation to the ERCB.</p> <p>Compliance achieved.</p>
3	DHI Energy Inc.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 1, 2011	<p>Well locations:</p> <p>08-31-052-12W4 County of Minburn</p> <p>10-09-049-23W4 Leduc County</p> <p>16-20-044-15W4 Flagstaff County</p> <p>Pipeline locations: 16-20-044-15W4 Flagstaff County</p> <p>08-31-052-14W4 County of Minburn</p>	<p>Global Refer status.</p> <p>Issuance of Abandonment Order No. AD 2011-80 and Closure/Abandonment Order No. AD 2011-81.</p> <p>Abandonment of well and pipeline licences.</p> <p>Licensee required to</p> <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul> <p>DHI Energy Inc. failed to comply. The ERCB is evaluating further actions.</p>
4	Frontier Energy Inc.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 20, 2011	<p>27 well locations:</p> <p>Mackenzie County Special Area 3</p> <p>36 pipeline locations:</p>	<p>Global Refer status.</p> <p>Issuance of Abandonment Orders No. AD 2011-82, AD 2011-83, AD 2011-84 and Closure/Abandonment Order No.</p>

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Low Risk Enforcement Action – (Global Refer) <sup>5</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
					Mackenzie County	<p>AD 2011-85.</p> <p>Abandonment of well and pipeline licences.</p> <p>Licensee required to</p> <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul> <p>Frontier Energy Inc. failed to comply. The ERCB is evaluating further actions.</p>
5	Jaycor Resources Inc.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 12, 2011	N/A – Against Licensee	<p>Global Refer status</p> <p>Issuance of Miscellaneous Order No. MISC 2011-94.</p> <p>Licensee required to</p> <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul> <p>Jaycor Resources Inc. failed to comply. Closure Orders No. C 2012-10 and C 2012-11, Abandonment Orders No. AD 2012-2, AD 2012-3, and Closure/Abandonment Order No. AD 2012-4 were subsequently issued.</p> <p>Jaycor Resources Inc. failed to</p>

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Low Risk Enforcement Action – (Global Refer) <sup>5</sup>						
#	Licensee	ERCB Group/ Compliance Category	Noncompliance Event	Date of Enforcement	Surface Location	ERCB Action(s) and Licensee Follow-up
						comply. The ERCB is evaluating further actions.
6	Woodthorpe Petroleum Ltd.	Liability Management/ Noncompliance with Liability Management Program Requirements	Failure to pay security deposit.	December 1, 2011	Well licences: 06-14-098-07W6 12-09-098-07W6 11-10-098-07W6 12-11-098-07W6  Facility licence: 11-10-098-07W6  Pipeline licences: 11-10-098-07W6 12-11-098-07W6 06-14-098-07W6 13-11-098-07W6 13-11-098-07W6 12-11-098-07W6 11-10-098-07W6  M.D. of Northern Lights	Global Refer status.  Issuance of Abandonment Order No. AD 2011-60A, AD 2011-61B, and AD 2011-62A.  Licensee required to <ul style="list-style-type: none"> <li>• pay the security deposit and</li> <li>• provide a written explanation acceptable to the ERCB addressing the failure to respond and detailing steps to prevent future occurrences.</li> </ul> Woodthorpe Petroleum Ltd. failed to comply. The ERCB is evaluating further actions.

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Legislative/Regulatory Enforcement Action <sup>6</sup>						
#	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

### <sup>1</sup> **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.

### <sup>2</sup> **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.

### <sup>3</sup> **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.

### <sup>4</sup> **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.

<sup>5</sup> **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).

<sup>6</sup> **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](mailto:compliancecoordination@ercb.ca).

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