



March 31, 2020

4900-7400-32640-02

Amanda Klein
Environment and Regulatory Advisor
Processing Recovery and Disposal Division
Secure Energy Services Inc.
3600, 205 – 5th Avenue S.W.
Calgary AB T2P 2V7

Dear Ms. Klein:

**RE: PRODUCED WATER AND NON-HAZARDOUS WASTE DISPOSAL
PRESSURE TESTING EXEMPTION
SECURE INGA c-88-J/94-A-12; WA# 29846
INGA FIELD – DEBOLT FORMATION**

Oil and Gas Commission staff have reviewed Secure Energy Services Inc.'s (Secure) request for amendment of condition 2h) of the Special Project Approval, Order 14-02-14, to biennial reservoir pressure testing.

The subject well was drilled in 2014 and approval for produced water and non-hazardous waste disposal was granted on November 26, 2014. Disposal operations began in April 2015 and as of February 29, 2020, a cumulative volume of 403,753.3 m³ has been injected. The most recent reservoir pressure test ended on March 21, 2020 and measured a pressure of 19,813 kPaa. Based on the disposal performance of the reservoir to date, Secure estimates a remaining disposal capacity of more than 500,000 m³.

As noted in the Commission's letter dated November 1, 2018, it appears that the subject well and the well Tervita E Blueberry d-A96-K/94-A-12 (WA# 27939), are within the same reservoir. A number of seismic events have been measured near Tervita E Blueberry d-A96-K/94-A-12. The Commission previously denied a request for amendment for reservoir pressure testing for the subject well Secure Inga c-88-J/94-A-12 (WA# 29846) due to the potential for communication between the two disposal wells.

While the Commission concurs that the pressure history indicates there is significant disposal capacity remaining in contact with Secure Inga c-88-J/94-A-12, monitoring pressure provides valuable information about inter-well communication and the viability of the shared reservoir for disposal. Annual reservoir pressure testing will be of greater importance as the well nears the maximum approved formation pressure. **As such, the Commission hereby waives condition 2h) of Order 14-02-014, the annual reservoir pressure testing requirement, for the 2021 calendar year, in well Secure Inga c-88-J/94-A-12 (WA# 29846), for the Debolt formation.**

The next reservoir pressure test required is for the 2022 calendar year. The Commission may consider a subsequent request for amendment of the reservoir pressure testing requirement following review of future well and reservoir information available at that time.

Should you have any questions, please contact Kathryn Archibald at (250) 419-4406 or the undersigned at (250) 419-4430.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Stefik".

Ron Stefik, Eng.L.
Supervisor, Reservoir Engineering
Oil and Gas Commission