



# RESERVOIR ENGINEERING PROJECTS NOTIFICATION AND OBJECTIONS PROCESS

## Notification

An application to the Reservoir Engineering Department of the Commission for a Special Project under section 75 of the Oil and Gas Activities Act, such as Good Engineering Practice, Pressure Maintenance Waterflood or Produced Water Disposal, triggers the Commission to post a Notice of Application on the Commission website [here](#), for a period of 21 days.

Publication of a Notice that an application has been made to the Commission provides an opportunity for owners of subsurface tenure and/or wells in proximity to the area of application to consider potential impacts to their interests.

The notice identifies the;

- company of ownership making application
- application type
- formation or specific pool of interest
- specific application area(s), or specific well in the case of a disposal well application
- applicant contact details
- end date for objections to be filed, close of business day, concluding the 21-day notice period.

Upon publication of the Notice the application becomes part of the public record. During the notice period, the applicant is obligated to provide a copy of the application to a requesting party, demonstration of tenure interest is not required. Failure to provide the application in a timely manner may be registered by the 3rd party with the Commission, potentially nullifying the notice process, requiring a new or extended advertising period. After the notice period the applicant is no longer obligated to respond to 3rd party requests, a copy of the application may be obtained from the Commission records department [through this link](#).

Direct notification of offsetting tenure owners by the applicant regarding the application, or their consent, is not required. The Notice process provides this declaration. However, where an objection may reasonably be expected, it is advised good practice to provide a notice of intent with a copy of the application to the offsetting owner(s), to begin direct discussions toward resolution of potential issues before involving the Regulator. This can avoid the filing of an objection, delaying the approval process.

## NOTES

- ❖ Surface stakeholder concerns are addressed through the OGC consultation and notification process for wells and facilities.
- ❖ A notice may not be posted, at the discretion of the Reservoir Engineering Department. Examples include an application for a minor amendment to an existing

approved project, where competitive interests are demonstrated in the application to not be a concern, such as adding a minor area of land to a project of large area, or an additional injection well in a waterflood project.

- ❖ Where a 21 calendar day Notice period includes a statutory holiday the posting period may be extended.

Where a 3<sup>rd</sup> party consulting company is submitting the application on behalf of a well permit holder, the application contact in the Notice may be listed as the submitting consulting company, however final OGC approval correspondence will be addressed to the permit holder.

## **Objections**

An objection to a Reservoir Engineering application must be filed before the close of business on the date specified in the Notice to ensure consideration by the Commission prior to rendering a decision. Objections must be in written format to the Commission's Supervisor, Reservoir Engineering, and must be copied to the applicant. Email attachments are acceptable delivery.

An objection to an application for a reservoir project must;

- (1) contain valid technical information with supporting documents, and
- (2) demonstrate the potential for a negative impact on effected tenure or wells, generally on hydrocarbon recovery, environment or safety, to have merit.

The objector is expected to have demonstrated interest in wells or tenure that would be potentially affected.

The applicant has opportunity to file a rebuttal to any objection. The applicant is expected to address each of the points raised, with bearing on;

- the rationale for granting an approval
- the impact on specific conditions of an approval, should it be granted.

Response to the objection must be addressed to the Commission, and cc'd to the objecting party. Conversely, the applicant may choose to withdraw the application, with written notice to the Commission.

Once an objection is filed, and is deemed by the Commission to have merit, the Commission will not proceed with an approval until such time as a response from the applicant is reviewed. If significant new data or interpretation is presented by either party, counter-argument may be made within 14 days of receiving the new submission. A reasonable number of iterations may occur so long as new information is being brought forward, however the OGC reserves the right to make a decision at any time. There is no formal hearing process.

An objection may be deemed by the Commission to not have merit, in whole or in part, requiring rebuttable only to the pertinent technical points raised. An approval may be granted, incorporating specific conditions tailored to address valid specific concerns (example: a requirement that a waterflood injection well be at least 'x' meters from a lease line boundary).

**Notes:**

- ❖ Copies of financial agreements between parties that resolve potential objections, such as production sharing agreements, are not required as part of a reservoir project application.