



Introduction:

-ER wishes to approach the AOR program in a cooperative and collaborative manner to ensure sites are remediated and reclaimed to comparable manner following the regulatory requirements

-This Webinar was created to help guide consultants and licensees in areas where ER has been seeing significant deficiencies in AOR applications

-This Webinar is intended to help ER and industry grow knowledge and experience to create a better final product which requires less review time due to a clearer picture of the history of the site and a better explanation when explaining justifications included in the applications

-Due to the funding from the ASCP program and the newly introduced ILRP program, ER understands that there will be a significant increase in AOR applications and as such any reduction in review times due to better applications submitted will allow for quicker review and approval times

AOR's and the Why

-An AOR application should be the last time a site has regulatory or industry eyes on the site and as such should fully close off any potential concerns prior to approval. ER does not want to have to go back in a few years because the justifications used to pass a site were not accurate and there are still issues with a site.

-The AOR application should tell the story of the site from beginning to end, drilling mud, spills, reclamation, why certain tests weren't completed and the science/evidence based justifications as to why that is acceptable, any landowner concerns/discussions with landowners etc. All of this information is relevant to the site and to the reviewers and needs to be clear

-All sites are UNIQUE and as such each application should be treated the same. These applications should not be “cookie cutter” but detailed to fully understand the intricacies of the sites and the communications between stakeholders that have occurred

SSCR (Summary Statement of Conclusions and Recommendations)

-The SSCR is the summary of the application. It should be detailed enough that once the reviewer has completed reading it, they should have very few questions and no real concerns with the site.

-Consultants that are completing the work are the EXPERTS of the sites, show the reviewer that. ER staff have never been to the sites and are only able to go off the information that you provide in your application and SSCR to make their decisions without a lot of back and forth due to missing details. It may be clear and obvious to the consultant, however ER reviewers only get what you send in, so take the extra time to tell a thorough DETAILED story Bad SSCR

-This example technically highlights all information that is included in the application, however it does not speak to any part of the application itself. No details are included, no information as to if there were justifications used to pass the DSA (this specific application had multiple justifications but not detailed explanation), no discussion as to why the landowner refused to sign or if the landowner had concerns or was happy with the site and just didn’t want to sign.

-This SSCR creates more questions than answers

Good SSCR 1 & 2

-These next two slides show how much detail can be included in a Summary Statement of Conclusions and Recommendations. When reading this through, no questions of the site remain unanswered. It explains step by step the history of the site and fills in any gaps that may exist

Stakeholder Engagement

-Stakeholder engagement is a very important part of every AOR application. It shows ER that licensees are actively engaging with all relevant stakeholders (landowners, occupants, Ministry’s that are affected) to ensure that all parties understand the process of a well/facilities life. From Building/drilling wells and facilities, regular maintenance/weed management of sites, decommissioning/abandoning wells and facilities, remediating and reclaiming sites, establishing vegetation, completing a DSA and finally severing a surface lease and ending lease payments.

All of these things should be discussed with relevant parties along with the Regulations and Directives that govern the process so that a solid understanding of what will occur and the timeframe it will occur in.

-An example of this would be “Dear landowner, it is the intention of “Licensee X” to abandon this well in the fall of 2023. From there, reclamation (explain what reclamation is) will occur in the spring/fall of 2024. After the reclamation the vegetation will be monitored until “Consultant Y” believes the site will pass a Detailed Site Assessment (explain what the DSA is). Once the DSA passes, we will contact you to get finally signoff for the site. This process usually takes three to five years and at the end of this, your lease payments will be ended.” During this conversation it would be wise to discuss with the landowner if there are any changes to the site they would wish that would not contradict the regulations (leaving an approach/access road in place, leaving fencing, etc.) to improve farming practices, etc. That way these can be discussed before hand and will reduce the chance of having to go back to the site to correct any potential issues.

-After reclamation, it would be wise to reach out to the landowner to notify them in the spring that a DSA is planned for that growing season and that if it passes, they will be reaching out for signoff in the fall and the AOR application can be provided to the landowner at that time. This is also a good time to ask if there are any issues with the rec so that a DSA is not completed if there are further issues that need to be rectified. Also offer the landowner the opportunity to be present during the DSA, and reiterate that the lease payments will be ending shortly after a passing DSA.

-This constant communication creates a good understanding of what is expected, timeframes, and a comfort level from the landowners so that they know what is occurring on their land and they feel that they have an opportunity to discuss their needs and concerns

Stakeholder Engagement 2

-This is a very detailed explanation of what occurred between the company and landowner and shows that although the landowner is not willing to sign off, the reason is not because they are unhappy with the site, but with payments/licensee themselves. It also includes the consultants opinion regarding what occurred with the landowner and the site itself.

Overlapping Sites

-Many sites get overlapped through the years, either abandoned and reclaimed and then rebuilt and redrilled, multi-well sites, facilities with wells, etc. and each have their own ways to zero the liabilities or transfer the liabilities

-For sites that have AOR approvals and are then overlapped by a new licence: when the new licence is abandoned and reclaimed, the historically approved AOR does not need to be reinvestigated as it was already investigated to today's standards.

-For sites that have received a Partial Exemption from Reclamation: for the licence that has taken reclamation responsibility, all areas of overlap must be investigated during the AOR

-For sites that have received a Full Exemption from Reclamation: All historical activities for ALL exempted licences must be fully investigated at the time of AOR for the entire history of the site

-For sites that have received a Grandfathered Approval: As a Grandfathered approval is not comparable to today's standard, any overlapped area must be investigated to the standard of an AOR, so you must investigate both (or more) licences, including drilling events, spills, etc.

Historical Spills 1, 2, & 3

-Any spills that occurred prior to the implementation of the AOR program on June 19, 2007 must follow the information on these slides

Gas Migrations

-These are field office specific requirements and will officially come into effect when the updated Directive PNG026 is released. Until the official release of PNG026, AOR applications will not be rejected due to failing these requirements, however it is strongly recommended to follow these requirements on a go forward basis.

Detailed Site Assessment

-The DSA is one of the most important parts of the AOR application and is meant to show that the site is truly comparable to the surrounding area. Giving more information and more details is always better than stating the site is "comparable". Actually show with visual evidence that these sites are comparable to offsite, and show where the offsite comparison is taking place.

-When assessing soil depths, all assessment should go to 50cm unless natural restrictions occur. A good example of this is if you are in the field and jumping on your shovel and it will not go past 30cm on and off lease, that is most likely natural restrictions. However if this is only occurring on site, then that is indicative of rec issues that need to be addressed.

-Wherever possible it is a good idea to meet the landowner on site. Whether this is during the DSA or prior but in the same growing season, it is very useful to engage with the landowner on site because they can show you exactly what and where their concerns are

Lease Boundaries

-It is a good idea to take a photo from each corner of the lease along each edge of the lease and towards well center to give a good view of what is occurring both on and off site. You can also take a photo away from the site to give further evidence that the site is comparable.

Well Center

-When taking photos at well center, you should not be standing on well center and taking pictures there. You should be 5-10m off of well center and taking pictures of the well center itself, showing any difference in vegetation from well center and the rest of the lease

Justification Photos

-When anomalies are found on and off site, whether these are increased weeds, bare areas, animal infestations (gopher hills, grazing issues, etc.) these should be documented with both photos of on site and comparable off site issues, rough measurements of the impacts, and where these issues are in comparison to the lease. This gives the reviewer a much better picture of the site, where issues are found on and off lease, and how comparable it really is.

UAV Photos

-UAV (drone) photos are not required, however they are incredibly helpful when making a case to show that a site is comparable to the surrounding area. These photos easily show bare spots, weeds, low areas affected by moisture in the spring, etc.