

# **RRRC 1901 – Data Collection & Analysis of Phase II Environmental Site Assessments (ESA) Associated with Drilling Waste Disposal Locations**

## **Purpose**

PTAC is seeking a project proposal to review Phase II ESA data / information from past drilling waste disposal locations to better understand the effectiveness of the AER Guidance document; *“Assessing Drilling Waste Disposal Areas: Compliance Options for Reclamation Certification (Guideline 2014)”*.

## **Background**

The revision of AER Directive 050 Drilling Waste Management (Directive 50) released May 2012 represented a significant shift in handling drilling waste, in part, by tightening disposal criteria. Based on revised requirements and documentation there is greater confidence that a Phase 2 ESA will not be required for newer wells. Conversely, there is less confidence in wells drilled prior to 2012 that

followed earlier editions of Directive 50. These older wells may represent an area of potential environmental concern that must be addressed at time of reclamation. To help address this concern, in March 2014 the AER released the revised Assessing Drilling Waste Disposal Areas: Compliance Options for Reclamation Certification. While there is inherent uncertainty in any Phase I ESA, experience suggests that Compliance Option One and Compliance Option Two in Guideline 2014 may be overly conservative. At the time of the guideline development it was known that the criteria may be conservative but the choice was made to err on the side of caution being as this was the initial version of the guideline.

Reducing the conservatism in the compliance options of the Compliance Options will have multiple benefits with the same environmental protection:

- More accurate and reproducible compound calculations and DST assumptions
- Reduced number of unnecessary Phase II ESA conducted on well sites
- Accelerated progression of sites to reclamation certification

It is also recognized that in certain cases there may also be a need for a particular trigger/criteria to be more stringent, this will also be investigated as part of the proposed project.

Background Presentation

## **Project Scope**

The intent behind this project proposal is to review Phase I and Phase II ESA data associated with drilling waste disposals, determine if the criteria in the Compliance Options are:

- Appropriate as currently written
- Recommended to be adjusted to reduce false positive or negative triggers for Phase II ESAs
- In need of any other potential adjustments (removal or additions)

A preliminary set of data has been reviewed as well as areas of concern identified which will be made available to the successful applicant. A summary presentation is included with this RFP for information purposes. AEP has indicated that information on drilling waste disposal post reclamation audits is also available. The applicant will be expected to review any recent information (i.e. technical papers, presentations) as well as other data sources to obtain as wide a data set as possible that may contribute to the project's success.

The project will trigger discussion with industry and regulatory agencies and potentially form the basis for any subsequent updates to the guidance document.

## **Deliverables**

The content of this proposal will provide ideas for

initial actions and discussion points as the project develops within the proposed stages. Project progress will be reviewed at the end of each Stage by the PTAC committee, which includes AEP and AER representatives.

### **Stage 1: Data Collection & Review**

1. Conduct a review of current applicable guidelines, literature, presentations, papers, and case studies for potential relevance to the project.
2. Determine a methodology to gather a sufficient sample size of Phase I and Phase II data related to drilling waste disposal locations. Sources may include (but not limited to); drilling waste disposal and reclamation companies/consultants records, initial CAPP member survey data, AEP post reclamation audit information, surveys of individual Oil & Gas Industry members.
3. Evaluate the impact of different aspects of the drilling waste disposal locations and impacts on the Phase II pass/fail rate (i.e. spud date, geographical areas, well depth, type of formations, mud type, etc..). Please note these are only included as suggestions for consideration and not to be considered as requirements.
4. Identify key areas of concern within the Compliance Options, and for each area develop a data set of the information, and provide an interpretation of the data indicating accuracy

of predicting the need for a Phase II (i.e. rate of pass/fail on triggered Phase II ESAs).

## **Stage 2: Recommendations & Proposed Guideline Adjustments**

- For each identified concern within the Compliance Options develop recommendations (status quo or recommended adjustment) along with supporting rationale and expected results / impacts of criteria modifications.
- Develop a proposed/draft rewrite of the criteria for consideration and discussion by PTAC steering committee.

## **Stage 3: Project Conclusion**

- Review results and participate in collaboration with a technical steering committee and/or PTAC.
- Prepare final recommendations and update document resulting from these discussions
- Develop a proposed updated Compliance Option Checklist and other tools as deemed appropriate for use by Industry and Regulatory agencies upon project completion.

It is anticipated that there will be ongoing informal communication with the PTAC and the technical steering committee throughout the project. The proposal should include components for each stage with milestones, the project schedule, proposed costs and relevant expertise of the applicant's proposed team.

## **Proposal Outline**

The requested proposal should contain a very short description of the PTAC project and scope of work, CV or statement of qualifications and short excerpts of reports written by the applicant. The proposal document, which should be no more than 5 pages in length, addressing the following elements must be delivered electronically or by mail to PTAC by the deadline stated above:

- Scope of work
- Deliverables
- Budget and execution schedules
- Personnel assigned to the project
- Qualifications (including drilling waste and reclamation knowledge and experience)
- Disclosure of co-funding agreements or partnerships
- Requested payment schedule, if any.

## **RFP Schedule**

December 13, 2018	RFP issued
February 11, 2019	Deadline for submission to PTAC
March 15, 2019	Proposal selected by RRRC

## **Selection Process**

PTAC has formed a Steering Committee for this project composed of industry stakeholders with relevant

expertise. PTAC will facilitate Steering Committee proceedings but will not be a decision-maker.

All submitted proposals will be provided to the Steering Committee for review. The Steering Committee will determine if proposals meet the requirements herein and provide an overall ranking based on Contractor qualifications and on proposal quality. The Steering Committee will make the final decision.

Once a selection of the best proposal according to the Steering Committee has been made, all submission contacts will be notified by email of the regarding the outcome of their individual proposal. The project final report will be shared on the PTAC website upon completion of the project.

### **Contact Information**

Proposals should be submitted online using the following form: Application Form

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