

Dormant Site Assessment Remediation Restoration and Stewardship Update CLRA 2020



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Overview

Dormancy and Shutdown Regulation
Assessment, Remediation, Restoration
OAG Audit
RVAP

Dormancy and Shutdown Regulation

Definitions – assess, remediate, restore, priority site

dormant wells – based on a specified period of inactivity

Classes of dormant sites based on when they became dormant

Specifies portfolio based requirements for decommissioning, assessment, restoration for each class of dormant sites

annual work plans and reporting

Liability Reductions Plans

Default Requirements

- Type A Decommission 30% by year 3, 70% by year 8, 100% by year 13
Assess by year 12 if site was decommissioned by Dec 31,2018
otherwise assess within 2 years of decommissioning
Restore – 40% by year 6, 70% by year 12, 100% by year 18
- Type B Decommission within 8 years of becoming dormant
Assess within 2 years of decommissioning, but if site was
decommissioned before it actually became dormant 10 years
Restore within 13 years of becoming dormant
- Type C Decommission within 5 years of becoming dormant
Assess within 2 years of decommissioning
Restore within 10 years of becoming dormant

Assessment and Reporting

Defined in Section 7

Both stages of a PSI described in CSR 58 (1) (a) and (b)
If numerical standards are exceeded – DSI CSR 59 (1) and (2)

Reports include:

Info required under CSR 58 (5)(c) and (d), 59 (3)

Any other info required by OGC

Signed professional statement as required by OGC

Dormant Site Assessment

58 (1) (a) and (b) Historical review, Reconnaissance visit, Interviews, info on PCOCs, activities described in a director's protocol, Sampling and analysis of relevant media,

59 (1) – COCs, area, depth and degree of contamination, evaluate relative to standards. Enough information to conduct a risk assessment or remediation plan as applicable

- allows for sequential or combined investigation

Assessment Reports

Reports must include the following information:

CSR 58 (5) (c) and (d) compilation of observations and data, interpretation and evaluation of data

CSR 59 (3) explain how the investigation was conducted and relationship to any prior investigations, compilation of observations and data, interpretation and evaluation of data showing area, depth, degree of contamination in relation to applicable standards

Some Misconceptions

Site assessment and reporting must be staged
PSI 1, PSI 2, DSI

Assessment of dormant sites requires MoE checklists
procedures and protocols be used rather than OGC
checklists, guidance, and procedures

Dormant Site Remediation

Section 8

Site is remediated by achieving:

A - CSR numerical standards

B – CSR risk based standards

C – Commission satisfaction

Commission can compel further action

Liability under EMA still applies

Satisfactory Remediation

Defined in Section 8 (1)(c)

Remediated to an extent that provides a permanent solution to maximum extent practicable considering:

- Risks posed by the contamination
- Background concentrations
- Technical feasibility, risks, costs, potential effects of remediating to 8(1) a or b

Restoration

Section 9

Site is remediated and:

The Commission gives written notice that the permit holder has met all of their obligations under OGAA and applicable specified enactments

OAG Audit

Office of the Auditor General

Managing Environmental Risks of Non-operating Oil and Gas Sites

Recommendations Include:

- Timely decommissioning and restoration
- Clarity on environmentally suitable reclamation outcomes
- OGC and MoE to review high risk site classification to ensure high risk sites are effectively managed
 - notifications of potential offsite migration
 - site risk classification form submission
- Surface reclamation audit - reporting

Restoration Verification Audit

RVAP 2019

All 10 sites Audited were determined to be acceptable in accordance with the RVAP protocol.

Included a qualitative review of adequacy of surface reclamation.

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