Clean Air Strategic Alliance

Draft Minutes

Flaring and Venting Project Team meeting #51

Date: Thursday, March 11, 2010 Time: 10:00 am – 3:30 pm

Place: CASA, 10th Floor, 10035 108 Street, Edmonton

In attendance:

Name Stakeholder group

Andrew Higgins CAPP/CNRL
Wayne Hillier Husky Energy
Randal McNeill Husky Energy

Jim Spangelo Alberta Energy Resources Conservation Board

John Squarek Small Explorers and Producers Association of Canada

Chris Severson-Baker Pembina Institute

Jolene Shannon Pembina Agricultural Protection Association

Anna Maslowski Alberta Energy

Krista Phillips (by phone) CAPP

Randy Dobko Alberta Environment Robyn Jacobsen CASA Secretariat

Petra Rowell CASA Secretariat - support

With regrets:

Name Stakeholder group

James Vaughan Alberta Energy Resources Conservation Board

Bob Barss Alberta Association of Municipal Districts and Counties

Karina Thomas Alberta Health and Wellness

Ian Peace RAPID

Guests:

Name Stakeholder group

Colby Ruff Alberta Energy Resources Conservation Board

Curtis (by phone – until 10:30) Golder and Associates

Andrew Higgins chaired the meeting, which convened at 10:00 a.m. Quorum was achieved.

Action Items:

	Who	Due
41.1: Distribute aggregate information on fugitive emissions once it	Krista	March 25 th
is available. Team agreed this information is still needed.	Phillips	meeting (#52)
47.2: Evaluate the impact of reducing 6 month testing/tie-in period in Wayn		Carry forward.
the heavy oil areas for anything in production in 2008 at Husky:		
Added: "Provide data on the number of wells, volumes for sites that		
ultimately do conserve, and the value of reducing tie-in from 6 to 4		
months".		
51.1: ERCB will provide a list of companies with batteries and wells	James &	Update - March
contributing to the increases from Feb to Mar 07. Krista will follow-	Krista	25
up with three companies that contributed to the increase, collate		
responses, and identify chronic issues behind the increases.		

51.2: Add a draft recommendation regarding flare emissions from flaring with non-hydrocarbon liquid, for further discussion. Check if	Robyn	March 25
there was any implementation of the action coming out of 2004		
report.		
51.3: ERCB will seek direction from their board on their role and if	James	March 25
the team can take more time to flesh out issues for the report.		
51.4: As there is currently a requirement for this to be reported in this	James	Fall meeting?
manner, ERCB will report back to the team in September on what		
they intend to do about combustion products (such as nitrogen or		
CO2) being reported in ST60B.		
51.5: Everyone to review the flaring and venting alternatives table	All	
and provide Wayne with any additions, deletions or clarifications		
before a final version is included in the team report.		

1) Administration

- a. Approval of the agenda: The meeting agenda was approved by consensus with the switch between item #3(update from ERCB) and #4 (update from Golder).
- b. Approval of the minutes from the previous meeting: Minutes of the January 15, 2010 meeting (#50) were approved by consensus with the following corrections noted:
 - page 5 should be m³, not cm³
 - page 6 text should make it clear that conservation infrastructure has been put in place for the Shell project only.
 - Action item 50.1 data review; CAPP and ERCB is sorting out who will do what.
- c. Action items follow-up: The action item list from the previous meeting was reviewed as follows:

Action items	Who	Due
41.1: Distribute aggregate information on fugitive emissions once it	Krista	Carry forward
is available. Team discussed and agreed this information is still	Phillips	
relevant and needed.		
44.7: Prepare a brief report on each battery flaring alternative,	Wayne	Done. On
including a classification based on technical feasibility and		agenda.
commercial viability.		
47.2: Evaluate impact of reducing 6 mth testing/tie-in period in heavy	Wayne	Carry forward.
oil areas for anything in production in 2008 at Husky. Provide data		
on number of wells, volumes for sites that ultimately do conserve,		
and the value of reducing tie-in from 6 to 4 months".		

48.6: Make a list of the top 50 batteries and wells (in Figure 5) that	Krista	Done.
were responsible for (a) the increases from Dec/07 to Jan/08 and (b)		
the decreases from July to Aug/08. The ERCB will forward this		
information to industry reps who will investigate possible reasons .		

- Dec/07 to Jan 08. The ERCB has tracked it down to the Nexen Long Lake batter. The team agreed that this was due to an upset condition during start-up (non-routine) and is not a FVPT issue.
- July to Aug/08. The ERCB has determined that this decrease was to due to how well tests were defined, not a problem with data.

Action Item 51.1: ERCB will provide a list of companies with batteries and wells contributing to the increases from Feb to Mar 07. Krista will follow-up with three companies that contributed to the increase, collate responses, and identify chronic issues behind the increases.

49.4: Estimate what actual increases in conservation the straw dog	James	Done
proposals might result in.	James	Done
**See notes below.		
	A 11 4	Dana
49.5: Consider amendments, additions, and alternate proposals for the	All team	Done.
straw dog recommendations and forward their comments to Robyn	members	
and/or Jennifer Allan.		
- No comments received. Straw dog has been updated based on Jan.		
meeting.		
49.7: Coordinate funding to hire the report writer.	Robyn	Done.
50.1 Dec 07 to Jan 08 and decreases July to Aug 08 to CAPP. CAPP	Jim, James,	See new Action
will then contact companies and collate responses and identify	Krista	Item 51.1
chronic issues behind the increases.		
50.2: Team members to send their comments on the draft Golder	All team	Done.
report to Jennifer to compile, circulate, and provide to Golder.	members	
50.3: Co-chairs continue to get progress updates from Golder via	Co-chairs	Done.
teleconferences Jan 29 and Feb. 12 (9:00 am start).		
50.4: The ERCB team members will seek advice from their board	James, Jim	Done. On
members and bring back advice to the team for the next meeting Feb.		agenda.
18.		
50.5: Present preliminary 2009 flaring and venting trend data to the	James, Jim	Done.
next team meeting.		
**See notes below.		
50.6: Products of combustion underground should not be included in	Jim	Done.
venting. Jim to draft a straw dog recommendation and provide to		
Jennifer Included in the last page of the straw dog (pg. 5)		
50.7: The team will review the RFP on Flare Emissions from Flaring	All	Done.
with Non-Hydrocarbon Liquid handed out at the meeting and provide		
comments to Jennifer by next Friday.		
	1	1

⁻ No comments were received..

Action Item 51.2: Adds a draft recommendation regarding flare emissions from flaring with non-hydrocarbon liquid, for further discussion. Check if there was any implementation of the action coming out of 2004 report.

Action Item 49.4 **to be verified by ERCB**

Crude Oil

- For crude oil batteries, if we set a <u>provincial</u> rate of 98% conservation efficiency and/or limited the flare volume to 214.10 E3M3, the volume of flaring and venting could decrease from 390.720 E6M3 to 261.355 E6M3 per year.
- If we set a minimum 98% conservation efficiency for all crude oil batteries, conservation could increase from 326.017 E6M3 from 390.720 E6M3 per year.

Bitumen

- For bitumen batteries, if we set a <u>provincial</u> rate of 90% conservation efficiency and/or limited the flare volume to 202.5 E3M3, the volume of flaring and venting could decrease from 336.4 E6M3 to 179.4 E6M3 per year.
- If we set a <u>minimum</u> 90% conservation efficiency for all bitumen batteries, conserve could increase from 258.215 E6M3 to 336.355 E6M3 per year.

Action Item 50.5 **to be verified by ERCB**

ERCB Preliminary data provided for solution gas flaring and venting (bitumen and oil):

2009	Volume = $653 E6M3$	Conservation Rate = 95.3%
2008	Volume = $727 E6M3$	Conservation Rate = 95.1%
2007	Volume = $675 E6M3$	Conservation Rate = 95.8%
2006	Volume = $693 E6M3$	Conservation Rate = 96.0%
2009	Volume = $662 E6M3$	Conservation Rate = 96.3%

2) Update on Golder Project

Golder provided an update on their report. It has taken a little longer to get information on the economic impact of stranded oil and to verify the information with producers. They expect to produce the next draft over the weekend, and distribute the report mid to end of next week. Golder thanked everyone for being responsive and patient as they add on this aspect of the report.

3) Update from ERCB

ERCB expressed some frustration with where the process is at. They went back and talked to their senior management. Their direction is that they will not make a statement regarding their viewpoint on the status quo if the team's report is non-consensus. They will assist with preparing the final report, but can not provide a non-consensus position. Then will provide the report to the ERCB board to decide on next steps.

A general discussion then followed about the process forward. It was stated that any stakeholder holding back their viewpoint undermines the CASA consensus process. There were some comments about the regulator's role in a consensus process to provide the motivation/impetus for parties to come together. This issue will be identified and discussed at the CASA board meeting on March 24.

During a round table discussion, some members commented that the upward trend in flaring and venting is not acceptable. The team needs to have a better understanding of this trend . . . is it due to non-routine issues? The ERCB also indicated that, due to the Shell conservation scheme and a decrease in activity, there would likely be no increase in venting in 2010.

There was general agreement around the need to strive for continuous improvement, although it is getting tougher technically and economically. Smaller projects are constrained by the economics. There was a suggestion to include the value of oil in the calculation.

There was also a suggestion to re-consider government initiatives and tools, such as GHG off-sets. Some members felt that an off-set protocol is not a fix for a regulatory issue – the off-sets protocol is a voluntary program that rewards companies for going above and beyond the regulatory requirements. Others felt that the off-sets protocol could be complementary to the regulation. I.e. Off-sets help to improve economics and potentially increase conservation for wells between 900 m3 and 500 m3.

It was identified that more time for more analysis is required. ERCB will ask if their board requires the report ASAP or if more time can be taken. There was also a question of who represents the ERCB at the CASA board.

Action 51.3: ERCB will seek direction from their board on their role and if the team can take more time to flesh out issues for the report.

4) Recommendations

There was a suggestion from one of the members to draft a recommendation that says:

Flaring and venting in the province must be reduced by XX% from 2008 levels by 20XX or XXX regulatory backstop will be enforced.

It would be up to industry to figure out how to make the reductions.

The morning's discussions led to a new "straw dog" summarized on flipcharts by the NGO co-chair including the following points:

- Lower the flaring and venting volume limit (currently 900 m3/day) to the technical limit. We don't know this number and would need to investigate, but it could be somewhere around 500 m3/day.
- Employ economic exemption for low productivity oil wells (include oil and gas value in rate of return on investment economic analysis). This is for single wells only: have different rules for multi-well and in-situ operations. Also need to address the difference between small and large projects: evaluate oil conservation, gas conservation, and cost to conserve. Do NPV for two case scenarios: if differential between the two falls within a certain range, then have to conserve.
- Look for opportunities to reduce non-routine flaring and venting and identify a plan to pursue these.
- Look for ways to shorten the tie-in and test period.
- Do further research on reducing technical limits.
- Examine opportunities to reduce volumes for natural gas well testing.

The team then reviewed the straw dog recommendations drafted by the secretariat and made the following points:

Recommendation 2a. Modify the economic analysis by adjusting the NPV level.

The team discussed adding that this amount be adjusted in conjunction with the update of D60 in accordance with the Consumer Price Index using 2006 as the base year).

Recommendation 2b. Modify the economic analysis by requiring a greater number of wells to conduct economic analysis.

The team discussed that this information available to the next team before they start. In recognition of the cost, use a sampling approach.

Recommendation 3: Conduct research needed to define lower technical limit of gas conservation.

The team discussed that a working group should prepare this work prior to the next project team starting its work. The recommendation should be split into two separate projects.

Recommendation 4: Reduce testing and tie in period for:

- a. Duration of Well Testing and Tie-In for Heavy Oil
- b. Duration of Testing for gas wells

There is no agreement on a recommendation regarding testing and tie-in.

The FVPT discussed a new recommendation that would result in industry developing a Best Management Practices guide for testing and tie-in. There were comments that the team would have to ensure that the BMPs were not interpreted as regulatory requirements.

Recommendation 5: Reconvene FVPT to evaluate potential to further reduce flaring and venting – when info is available from economic analysis and studies on lower technical limit.

The team discussed changing the date of when it reconvenes.

Recommendation 6: Where combustion is occurring in underground reservoirs, combustion products (such as nitrogen or CO2) should not be reported in ST60B.

Action 51.4: As there is currently a requirement for this to be reported in this manner, ERCB will report back to the team in September on what they intend to do about this.

5) Final Report

The project team table of contents (TOC) was circulated to the team. Robyn walked everyone through the major sections and asked for feedback.

6) Battery Flaring Alternatives

Industry provided a matrix of battery flaring alternatives (e.g. fuel cells, micro-turbine generators) based on whether they are technically feasible and/or commercially viable, or technically or commercially not proven for Alberta's conditions on small well battery projects. This was provided for information only but was agreed it should be included as an appendix in the report.

Action 51.5: Everyone to review the table and provide Wayne with any additions, deletions or clarifications before a final version is included in the team report.

7) CASA Board Meeting, March 24

A FVPT Status Report for the March 24 CASA Board was reviewed by the co-chairs and submitted in the CASA board meeting briefing binder. Status reports are not usually discussed at board meetings but there

is time for members to ask questions. The ERCB issue will likely be discussed and Robyn will bring back to the team any directions received from the board.

8) Next Meeting Date

Date	Time	Place
March 25	10:00	Calgary

9) Adjournment – The meeting was adjourned at 3:30 p.m.