New Section from Policy Intent Document	New Text from Policy Intent	Consolidated Comments
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PART 10 - EVALUATION OF WELLS, POOLS AND FIELDS		
Definitions	"Good Oil Field Practices" means those practices, methods, standards and procedures generally accepted and followed by prudent, diligent, skilled and experienced operators in petroleum exploration, development and production operations.	***Rationale:*** Economic prudence is inherent in overarching concept of Good Oil Field Practices. However, there is no reference in the definition or anywhere in the policy document to the consideration of economics or prudent business practice to support decision making. For example, in regards to recovery decisions, as a criteria for determining ultimate recovery; "economic" may be inferred as part of this definition but it would be more appropriate if the term is explicitly included; The Atlantic Accord Implementation Act and "waste" has an economic component; however, it is also good to ensure that economic principles will be used if not explicitly mentioned ***Recommended Definition:*** *"*Good Oil Field Practices" means those practices, methods, standards and procedures generally accepted globally and followed by prudent, diligent, skilled and experienced operators in petroleum exploration, development and production operations with consideration of new and/or global technology or practices and business economics, which can meet the intent of the regulations "Good Oil Field Practices" – there is an inconsistency between the definition and some areas in the document, the definition has Oil Field as 2 words but other areas have it as one word (i.e. oilfield).
10.1 General	The operator shall ensure that the well data acquisition program and the field data acquisition program (set out in section 3.7 of Phase I) are implemented in accordance with good oilfield practices.	
10.2 Approval of Alternate Measures	(1) If part of the well or field data acquisition program cannot be implemented, the operator shall ensure that (a) a conservation officer is notified as soon as the circumstances permit; and (b) the measures to otherwise achieve the goals of the program are submitted to the Board for approval. (2) If the operator can demonstrate that the measures submitted under (1)(b) can achieve the goals of the well or field data acquisition program or are all that can be expected in the circumstances, the Board shall approve those measures.	

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10.3 Formation Testing and Sampling	The operator shall ensure that every formation in a well is tested and sampled to obtain reservoir pressure data and fluid samples from the formation, if the Board believes that the data or samples would contribute to the geological and reservoir evaluation.	***Rationale:*** The use of the word "believe" implies that subjective decision making will / may be used. It is not appropriate to simply have a requirement to test and sample that is only based on a belief by the Board that such data will contribute to an evaluation. Additional data gathering, of any kind, should be based on scientific evidence that the additional data contributes materially to the geological and reservoir evaluation. ***Proposed Policy Text:*** "The operator shall ensure that prospective formations encountered on an exploration or delineation well within a geological feature are tested and sampled to obtain reservoir pressure data and fluid samples from the formation, where objective evidence substantiate or indicate that the data or samples would contribute to the geological and reservoir evaluation." ***Alternatively, we recommend that the policy revert to current wording in D&P regulations.*** "The operator shall ensure that every formation in a well is tested and sampled to obtain reservoir pressure data and fluid samples from the formation, if there is an indication that the data or samples would contribute substantially to the geological and reservoir evaluation".
	(1) The operator shall ensure that (a) no development well is put into production unless a formation flow test has been approved by the Board and has been subsequently carried out in accordance with the approval; and (b) if a development well is subjected to a well operation that might change its deliverability, productivity or injectivity, a formation flow test is conducted after the well operation is ended and the flow or injection conditions have stabilized to determine the effects of that operation on the well's deliverability, productivity or injectivity.	***Rationale:*** The use of the term "stabilized" in this context is considered inappropriate as it known that some wells will never "stabilize". ***Proposed Policy Text:*** (1) The operator shall ensure that: (a) no development well is put into production unless a formation flow test has been approved by the Board and has been subsequently carried out in accordance with the approval; and (b) if a development well is subjected to a well operation that might change its deliverability, productivity or injectivity, a formation flow test is conducted after the well operation is ended and the flow or injection conditions suggest that the operation has affected the well's deliverability, productivity or injectivity. ***General Comment:*** CAPP support the approach implied in section 10.4.1.(b) where the specified test is to be conducted within a reasonable timeframe. This approach provides industry with the flexibility and capability to conduct the test in accordance with good oilfield practice.
	(2) The operator may conduct a formation flow test on a well drilled on a geological feature if, before conducting that test, the operator (a) submits to the Board a detailed testing program; and (b) obtains the Board's approval to conduct the test.	

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10.4 Formation Flow Testing	(3) The Board may require that the operator conduct a formation flow test on a well drilled on a geological feature, other than the first well, if the Board believes that the test would contribute to the geological and reservoir evaluation.	***Rationale:*** The use of the word "believe" implies that subjective decision making may be used whereas the decision should made on scientific / objective evidence as opposed to a Board request that has no demonstrated scientific or objective basis. **Proposed Policy Text:** (3) The Board may require that the operator conduct a formation flow test on a well drilled on a geological feature, other than the first well, where objective evidence or scientific data substantiate or indicate that the test would contribute to the geological and reservoir evaluation. ***Alternatively, we recommend that text revert to current wording in D&P regulations.*** "The Board may require that the operator conduct a formation flow test on a well drilled on a geological feature, other than the first well, if there is an indication that the test would contribute substantially to the geological and reservoir evaluation."
	(4) The Board shall approve a formation flow test if the operator demonstrates that the test will be conducted safely, without pollution and in accordance with good oilfield practices and that the test will enable the operator to (a) obtain data on the deliverability of the reservoir and productivity of the well; (b) establish the characteristics of the reservoir; and (c) obtain representative samples of the formation fluids.	***Rationale:*** Adherence to the principles and intentions of "Good OilField Practices" mandates the avoidance of pollution as well as the safe conduct of the work. Formation flow testing operations are performed in compliance with the requirements stated in the applicable regulatory approval as well as adhering to the requirements of the Operators health, safety and environmental management system. The approval to test is done in advance of doing the test so "will" applies to the requirement for the operator to demonstrate items a), b) and c) can be achieved prior to testing. If one of the criteria cannot be met during testing, a follow-up discussion should be held with the Board ***Proposed Policy Text:*** (4) The Board shall approve a formation flow test; where, the Operator can demonstrate that the test will be conducted safely and in accordance with good oilfield practices; and, the test is being conducted for the purpose of: (a) obtaining data on the deliverability of the reservoir and productivity of the well; (b) establishing the characteristics of the reservoir; and, (c) obtaining representative samples of the formation fluids.
10.5 Submission of Samples and Data	(1) The operator shall ensure that all cutting samples, fluid samples and all cores collected as part of the well and field data acquisition programs are a) transported and stored in a manner that prevents any loss or deterioration (b) delivered to the Board within 60 days after the well termination date unless analyses are ongoing, in which case those samples and cores, or the remaining parts, are to be delivered on completion of the analyses; and (c) stored in durable containers properly labelled for identification.	***General Comment:*** According to the definitions section "termination" means when a well has been abandoned, completed or suspended. There are cases where development wells aren't completed right away, and thus would therefore be terminated several times according to the current definition for "terminated". We suggest a revision to address the potential for inconsistency in interpretation of the termination status of a well.
	(2) The operator shall ensure that after any samples necessary for analysis or for research or academic studies have been removed from a conventional core, the remaining core, or a longitudinal slab that is not less than one half of the cross-sectional area of that core, is provided to the Board.	

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	3) The operator shall ensure that after any samples necessary for analysis or for research or academic studies have been removed from a sidewall core, the remaining core is provided to the Board.	
	(4) Before disposing of cutting samples, fluid samples, cores or evaluation data collected under these Regulations, the operator shall ensure that the Board is notified in writing and is given an opportunity to request delivery of the samples, cores or data.	
PART 11 - MEASUREMENTS		
11.1 Flow and Volume	(1) Unless otherwise included in the approval issued under clause 3.3 (Phase I), the operator shall ensure that the rate of flow and the volume of the following are measured and recorded: (a) the fluid that is produced from each well; (b) any fluid or waste material that is injected into each well; and (c) the manner in which fluids are disposed of, [including through venting, burning, flaring, and transportation for processing whether through offloading or pipeline] and; (d) the quantity of disposed fluids.	***Rationale:*** Section 1 indicates that flow and volume are measured and recorded. However in c the proposed language is asking for a description of the manner in which fluids are disposed. The section should be distinct as a and b lend themselves to measurement and c is descriptive. We recommend the introduction of a new subsection 11.1.2.to state the descriptive requirements for disposed fluids as stated in 11.1.1 c and d, separate from the measurements requirements for produced and injected fluid in a and b. ***Proposed Policy Text:*** (1) Unless otherwise included in the approval issued under clause 3.3 (Phase I): (a) the operator shall ensure that the rate of flow and the volume of the following are measured and recorded: (i) the fluid that is produced from each well; (ii) any fluid or waste material that is injected into each well; and (2) Unless otherwise included in the approval issued under clause 3.3 (Phase I), the operator shall ensure that: (a) the manner in which fluids are disposed of, [including venting, burning, flaring, and transportation for processing whether through offloading or pipeline] is documented; and, (b) the quantity of disposed fluids is recorded. Note: The suggested numbering above o necessitate changing subsection (2) and (3) to subsections (3) and (4).
	2) The operator shall ensure that any measurements are conducted in accordance with the flow system, flow calculation procedure and flow allocation procedure, approved under clause 3.3 (Phase I).	
	(3) The operator shall ensure that group production of oil, water and gas from wells and injection of a fluid into wells is allocated on a pro rata basis, in accordance with the flow system, flow calculation procedure and flow allocation procedure approved under clause 3.3 (Phase I).	

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	(4) If a well is completed over multiple pools or zones, the operator shall ensure that production or injection volumes for the well are allocated on a pro rata basis to the pools or zones in accordance with the flow allocation procedure approved under clause 3.3 (Phase I).	***Rationale:*** CAPP concerns with respect to the use of the term "zones" have been communicated. Additionally, our review of the Phase 2 Policy Intent Document continues to concern industry in that although we have communicated comments with the anticipation that these comments would be included in subsequent policy; this is not the case. Subsequently, it would be helpful to understand the status of comments prior to the issuance and review of future policy documents. It should be noted that designated "zones" have far reaching implications to development strategies. Particularly with respect to commingled production restrictions. Production measurement and allocation to zones will be very challenging and requirements to do so may render zonal development uneconomical. ***Proposed Policy Text:*** (4) If a well is completed over multiple pools, the operator shall ensure that production or injection volumes for the well are allocated on a pro rata basis to the pools in accordance with the flow allocation procedure approved under clause 3.3 (Phase I).
11.2 Testing, Maintenance and Notification	The operator shall ensure (a) that meters and associated equipment in the flow system are calibrated and maintained to ensure their continued accuracy; (b) that equipment used to calibrate the flow system is calibrated in accordance with good measurement practices; (c) that any component of the flow system that may have an impact on the accuracy or integrity of the flow system and that is not functioning in accordance with the manufacturer's specifications is repaired or replaced without delay, or, if it is not possible to do so without delay, corrective measures are taken to minimize the impact on the accuracy and integrity of the flow system while the repair or replacement is proceeding; and (d) that a conservation officer is notified, as soon as the circumstances permit, of any modification, malfunction or failure of any flow system component that may have an impact on the accuracy of the flow system and of the corrective measures taken.	***Rationale:*** As there is no reference to a performance standard or definition for "good measure practice" the reference is subjective and its application will be inconsistent. ***Proposed Policy Text:*** We recommend replacing the reference to "good measurement practice" in subsection (b) with "good oilfield practices".
11.3 Transfer Meters	The operator shall ensure that (a) a conservation officer is notified at least 30 days before the day on which any transfer meter prover or master meter used in conjunction with a transfer meter is calibrated; and (b) a copy of the calibration certificate is provided to the Chief Conservation Officer as soon as the circumstances permit, following completion of the calibration.	***Rationale:*** Industry are satisfied with the 30 days notice pertaining to meter calibration status. However, we recommend provision for minor scheduling changes be permitted due to varying uncontrollable circumstances ***Proposed Policy Text:*** The operator shall ensure that (a) a conservation officer is notified at least 30 days, or as agreed to in writing by the Board, before the day on which any transfer meter prover or master meter used in conjunction with a transfer meter is calibrated
11.4 Proration Testing Frequency	The operator of a development well that is producing oil or gas shall ensure that sufficient proration tests are performed to permit accurate determination of the allocation of oil, gas and water production on a pool and zone basis.	***Performance vs. Prescriptive Text:*** Policy 11.4 states: "The operator of a development well that is producing oil and gas shall ensure that sufficient proration tests are performed to permit accurate determination of the allocation of oil…" This implies that the operator has some discretion how in often to well test, however, in the Boards Measurement Guidelines both the Frequency of testing (twice per month) and Accuracy are well defined (+5% for all produced fluids) leaving the operator with little or no flexibility. We would like to highlight that a performance based objective stating the target objective (i.e., 5%) would be the preferred approach and not prescribe the minimum or maximum number of tests that are required to achieve the performance objective.
PART 12 - PRODUCTION CONSERVATION		

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12.1 Resource Management	The operator shall ensure that (a) recovery from a pool or zone is maximized in accordance with good oilfield practices; (b) wells are located and operated to provide for maximum recovery from a pool or zone; and (c) if there is reason to believe that infill drilling or implementation of an enhanced recovery scheme might result in increased recovery from a pool or field, studies on these methods are carried out and provided to the Board.	***Rationale:*** The explicit direction to achieve maximum recovery without consideration for fundamental economics or a determination of feasibility in accordance with good oilfield practices is concerning. +D31 Although, economics is stated in the definition of waste in Act, there are no direct references within the context of the policy intent document. Government and regulatory bodies must demonstrate their appreciation for economic principles through inclusion of the term in the appropriate content of it policy documents. Decision or direction to commence infill drilling or enhancement of recovery scheme should be substantiated with objective evidence and/or scientific data to which the Operator has possession. Additionally, these decisions should also be consistent with the principles outlined in Operators approved Resource Management Plan. ***Proposed Policy Text:*** The operator shall ensure that: (a) recovery from a pool is economically maximized in accordance with good oilfield practices; (b) wells are located and operated to provide for maximum economic recovery from a pool; and (c) if there is objective evidence to substantiate or indicate that infill drilling or implementation of an enhanced recovery scheme may economically increase the recovery from a pool or field, studies on these methods are carried out and provided to the Board.
12.2 Commingled Production	(1) No operator shall engage in commingled production except in accordance with the approval granted under subsection (2). (2) The Board shall approve the commingled production if the operator demonstrates that it would not reduce the recovery from each pool or zone. (3) The operator engaging in commingled production shall ensure that the total volume and the rate of production of each fluid produced is measured and the volume from each pool or zone is allocated in accordance with the requirements of Part 11.	***Rationale:*** As stated in Section 12.1, the direction to achieve maximum recovery without consideration for fundamental economics or a determination of feasibility in accordance with good oilfield practices is concerning. The criteria for approving commingled production should be based on maximizing economic recovery from a well. There are likely instances where commingled production results in higher overall production from a well than when completing each zone or pool individually. There exists probable cases where a proposed program will increase overall comingled recovery from a pool or well. However, given the context of the policy statement, if the recovery from a less productive zone is possibly reduced by an unspecified amount/percentage then approval will not be granted to enhance overall recovery in accordance with good oilfield practice. ***Proposed Policy Text:*** (1) No operator shall engage in commingled production except in accordance with the approval granted under subsection (2). (2) The Board shall approve the commingled production if the operator demonstrates that: (a) it would not reduce the recovery from each pool.; or, (b) the commingled production would increase overall recovery. (3) The operator engaging in commingled production shall ensure that the total volume and the rate of production of each fluid produced is measured and the volume from each pool is allocated in accordance with the requirements of Part 11.

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12.3 Gas Flaring and Venting	No operator shall flare or vent gas unless (a) it is permitted in the approval issued under subsection 10.4(4); (b) the Board specifically authorizes flaring as part of the authorization issued under (the relevant sections of the Acts); or (c) it is necessary to do so because of an emergency situation and the Board is notified as soon as the circumstances permit, of the flaring or venting and of the amount flared or vented.	***General Comment:*** CAPP support the use of the policy text in section 12.3 as it describes in sufficient detail the approval and reporting parameters respecting flaring and venting without adding undue prescription.
12.4 Oil Burning	No operator shall burn oil unless (a) it is permitted in the approval issued under subsection 10.4(4); (b) the Board specifically authorizes burning as part of the authorization issued under (the relevant sections of the Acts); or (c) it is necessary to do so because of an emergency situation and the Board is notified as soon as the circumstances permit, of the burning and the amount burned.	***General Comment:*** CAPP support the use of the policy text in section 12.4 as it describes in sufficient detail the approval and reporting parameters respecting the burning of oil without adding undue prescription.
PART 13 - TERMINATIONS AND DECOMMISSIONNING		
13.1 Suspension or Abandonment of a Well	(1) The operator shall ensure that every well that is suspended or abandoned is left in a condition that (a) provides for isolation of all oil or gas bearing zones and discrete pressure zones; and, in the case of an onshore well, groundwater (COGOA onshore only); (b) prevents any formation fluid from flowing through or escaping from the well-bore; and (c) ensures it can be readily located.	***Rationale:*** The P&A industry has significantly evolved in the last decade, moving from a less prescriptive approach to a more goal based approach to well abandonment, with the goal being to restore the cap rock (or essentially the reservoir sealing mechanism). There have been learning's in industry to suggest the prescriptive approach of isolating producing intervals may not be sufficient in some cases. The cap rock approach is based on technical evaluation of the field with a clear goal, yet also incorporates well known industry practices and learning's in cementing. We believe this initiation has given us an opportunity to suggest a shift from regulations with a less clearly understood goal to those with a very clear goal, while also aligning with the direction other regulators around the world are taking (similar approach has been approved in Australia, Norway and UK sector of North Sea) Some jurisdictions have adopted this approach directly as regulatory requirement, while others have approved the approach as an alternative approach to the regulatory requirement. ***Proposed Policy Text:*** (1) The operator shall ensure that every well abandonment restores caprock via void-free, rock to rock barriers, such that: a) all formations capable of flow are isolated from the surface or seafloor, or in the case of an onshore well, are also isolated from any groundwater; b) all hydrocarbon-bearing formations are isolated from the surface by two permanent barriers, or two permanent barriers combined into one single permanent combination barrier, while all non-hydrocarbon-bearing formations are isolated from the surface by one single permanent barrier; c) all barriers meet the following criteria: i. placed across laterally extensive impermeable formation with adequate fracture strength and thickness to withstand anticipated future pressure; ii. contain sufficient verified good quality primary cement, meaning >30 m per barrier if logged or >300m if not logged; iii. supported to prevent slumping or gas migration; iv. does not contain a potential conduit for flow (e.g.. control lines or cables); v. single barriers are typical 100 m to achieve 30 m good quality cement, while combination barriers are typical 150 m to achieve 60 m good quality cement; and, d) formations or groups of formations containing similar fluids and within similar pressure regimes may be isolated together.
	(2) The operator shall verify the isolation of all oil and gas bearing zones and discrete pressure zones (in the case of an onshore well, groundwater) prior to suspending or abandoning the well.	Refer to Rationale and Proposed Policy Text under Section 13.1 (1)
	3) The means to verify the isolation of zones required by paragraph (a) is to be provided as part of the application for well approval for the suspension or abandonment of a zone or well. (This will be included in the policy intentions for Part 3 – Applications that was presented during Phase I).	Refer to Rationale and Proposed Policy Text under Section 13.1 (1)

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	(4) The operator of a suspended well shall ensure that the well is monitored and inspected to maintain its continued integrity and to prevent pollution.	
	(5) The operator shall ensure that, on the abandonment of any offshore well, the seafloor is cleared of any material or equipment that might interfere with navigation or other uses of the sea, or have an adverse effect on the marine environment.	***Proposed Policy Text:*** The operator shall ensure that on the abandonment of any offshore well, all casing strings are cut and removed below the seafloor, and the seafloor is cleared of any material or equipment that might interfere with navigation or other uses of the sea or have an adverse effect on the marine environment.
	(COGOA onshore only) (6) The operator shall ensure that, on the abandonment of any onshore well, the well is left in a condition that protects groundwater and prevent any adverse effect on the environment.	
13.2 Removal of Drilling Installation	No operator shall remove or cause to have removed a drilling installation from a well drilled unless the well has been terminated in accordance with these Regulations.	***Rationale:*** The policy does not contemplate emergency disconnect situations (i.e. disconnect due to weather or ice) or other situation where disconnect operations are initiated as a precautionary measure. The definition for "terminated" in Part 14 only applies when a well has been abandoned, completed or suspended. ***Proposed Policy Text:*** (1) No operator shall remove or cause to have removed a drilling installation from a well drilled unless: (a) the well has been terminated in accordance with these Regulations, or (b) the removal of the installation is for emergency or precautionary purposes.
PART 14 - SUBMISSIONS, NOTIFICATIONS, RECORDS AND REPORTS		
		General Comment: "Incident": There is no definition of incident within the definitions section of the document (this was defined in the D&P Regulations) however the term is used throughout the document. In the absence of a defined term, it's unclear what will require formal regulatory reporting, and this lack of definition could result in the expectations to report incidents which do not meet "reportable incident" criteria. Suggest having the same definition as in the D&P regulations to ensure consistency.
DEFINITIONS	"abandoned," in relation to a well, means a well or part of a well that has been permanently plugged	
	"commenced" in relation to a geoscience, geotechnical or environmental program, means when the authorized activities related to the project have started	
	"completed" in relation to a well, means a well that is prepared for production or injection operations	
	"completed" in relation to a geoscience, geotechnical or environmental program, means when the authorized activities have concluded	

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	"completion interval" means a section within a well that is prepared to permit the (a) production of fluids from the well; (b) observation of the performance of the reservoir; or (c) injection of fluids into the well.	
	"cancelled" in relation to a geoscience, geotechnical or environmental program, means the operator no longer intends to undertake the authorized work or activity	
	"non-productive time" in relation to a geoscience, geotechnical or environmental program, means any period of time where data acquisition is delayed or interrupted for any reason	
	"suspended" in relation to a geoscience, geotechnical or environmental program, means the activities associated with the program have temporarily ceased	
	"suspended", in relation to a well or part of a well, means a well or part of a well in which drilling or production operations have temporarily ceased	
	"termination" means when a well has been abandoned, completed or suspended	
	"well operation" means the operation of drilling, completion, recompletion, intervention, workover, suspension or abandonment of a well	
	"workover" means an operation on a completed well that requires removal of the Christmas tree or the tubing	
14.1 Reference to Names and Designations	When submitting any information for the purposes of these Regulations, the operator or the operator's representative shall refer to each well, pool, and field by the name given to it under Clauses 1.1 and 1.2 (Phase I), or if a zone, by its designation under Clause 1.2 (Phase I).	
14.2 Location Surveys	(1) The operator shall ensure that a survey is used to confirm the location of a well and the location of a production installation.	***General Comment:*** The reference to production installation is vague, subsequently it is difficult to fully appreciate the application of the policy. The inclusion of a definition for "production installation" is necessary to ensure survey requirements are met. The Drilling and Production Regulations outline definitions for "production facility" and "production platform" however there is no definition for production installation.
	(2) The operator shall ensure that (a) the survey is certified by a person licensed under the Canada Lands Surveyors Act, and b) a copy of the survey plan filed with the Canada Lands Survey Records is provided to the Board.	

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14.3 Submission of Data and Analysis	(1) The operator shall ensure that a final copy of the results, data, analyses and schematics obtained from the following sources is provided to the Board: (a) testing, sampling and pressure surveys carried out as part of the well and field data acquisition programs referred to in Clause 10.1 and testing and sampling of formations referred to in Clause 10.3; and (b) any segregation test or well operation.	
	(2) Unless otherwise indicated in these Regulations, the operator shall ensure that the results, data, analyses and schematics are provided within 60 days after the day on which any activity referred to in paragraphs (1)(a) and (b) is completed.	***Rationale:*** There are frequent cases where data and analysis reports required for reporting may not be available within the specified due date. **Proposed Policy Text:** "Unless otherwise indicated in these Regulations, the operator shall ensure that the results, data, analyses and schematics are provided within 60 days, unless otherwise agreed in writing with the Board, after the day on.…." Additionally, there are unclear paragraph references for Section 14.3 – the reference to "paragraphs (1)(a) and (b)" should be "paragraphs 14.3.1(a) and (b) of this section ".
14.4 Management of, and Accessibility to, Records	The operator shall ensure that records necessary to support operational and regulatory requirements are readily accessible for inspection by the Board.	***General Comment:*** The interpretation and application of the policy text appears impractical given the enormous amount of data and records that are generated and retained by Operators. It would be helpful to understand the planned approach for specific timelines and requirements pertaining to records retention. Records pertaining to operations are retained for a reasonable time period and either discarded or retained in archives and thus not readily accessible.
	The operator shall ensure that records are kept of (a) the location and movement of support craft; (b) emergency drills and exercises, incidents, near-misses; (c) the quantities of consumable substances on the installation or at the operations site; (e) other information critical to safety or the protection of the environment; (f) all inspection, maintenance and operating activities, including any activity that may be critical to the safety on the installation or operations site, the protection of the environment or the prevention of waste;	***General Comment:*** FORRI has stated that Stakeholders should apply the definitions in the current regulations in their interpretation of the intent of the policy intent. As the final definitions are unavailable during the review process there exist a potential that policy intent is misinterpreted therefore the effort to present FORRI with sound feedback on the Phase 2 Policy Intent document may have less relevance and value. This potential outcome would be unfortunate and CAPP encourage FORRI to ensure all definitions and specifically Near Miss and Incident are issued for review and interpretation prior to the issuance of the final Phase 3 Policy Intent Document.

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14.5 Records	g) in the case of an installation, (i) the inspection of the installation and related equipment for corrosion and erosion and any resulting maintenance carried out, (ii) the pressure, temperature and flow rate data for compressors and treating and processing facilities; (iii) the calibration of meters and instruments; (iv) the testing of surface, subsea and subsurface safety valves; (v) the status of each well and the status of well operations; and (vi) the status of the equipment and systems critical to safety and protection of the environment including any unsuccessful test result or equipment failure leading to an impairment of the systems;	
	(h) in the case of a floating installation, (i) all installation movements, data, observations, measurements and calculations related to the stability and station-keeping capability of the installation; (ii) results of every test and analysis conducted pertaining to its stability and station-keeping capability; and (iii) every change in weight or position of weight on the platform that may affect the stability of the platform.	***Rationale:*** In reference to subsection (iii), the requirement to retain records of every change in weight or position of weight on the platform that may affect the stability of the platform is an all encompassing statement and would be difficult for implementation. Additionally, if (h) deals with a floating installation, then sub-bullet (iii) should not reference "platform". This sub-section should reference "installation" to remain consistent. ***Proposed Policy Text:*** Option A: (iii) every fundamental change in weight or position of weight on the platform or installation that may affect the designed stability of the platform or installation. Option B: (iii) every change in weight or position of weight on the platform or installation, outside the scope of the "approved stability manual" that may adversely affect the stability of the platform or installation.
14.6 Meteorological Observations	The operator of an offshore (“offshore” only for COGOA version) installation or operations site shall ensure (a) that a comprehensive record of observations of physical environmental conditions is maintained onboard/at the installation or at the operations site; and (b) that forecasts of meteorological conditions, sea states and ice movements are obtained and recorded each day and each time during the day that they change substantially from those forecasted.	
14.7 Incidents and Near Misses - Notification	The operator shall notify the Board of any incident or near-miss as soon as the circumstances permit.	***Rationale:*** The requirement to notify the Board of any incident or near miss as soon as circumstances permit is all encompassing and would be difficult to administer without the provision of a definition and reporting criteria. Industry and regulatory classification criteria determine the reportability of incidents and near miss. Industry currently include incident and near miss data within the relevant Daily Reports (i.e., Drilling, Production etc..). At present, industry adheres to the Incident Reporting and Investigation Guidelines as developed by the Boards. The Guideline outline specific reporting criteria and timelines for reporting of incidents and near miss as defined in the D&P Regulations. In the absence of a definition and specific reporting criteria, it’s unclear what will require formal regulatory reporting and the appropriate timing for such reporting. ***Proposed Policy Text:*** We recommend that a definition for "incident and near miss" be included within the definitions section of the document as contained in the D&P Regulations and the policy text should point to criteria consistent with the definition for reporting requirements.

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14.8 Incidents and Near Misses - Investigation	The operator shall ensure that (a) any incident or near-miss is investigated, its root cause and causal factors identified and corrective action taken; and (b) at the request of a safety or conservation officer, a copy of an investigation report identifying the root cause, causal factors and corrective action taken is provided to the Board no later than 21 days after the day on which officer made their request.	***Rationale:*** In reference to subsection (a), the requirement to investigate any incident or near miss is an all encompassing statement and is not consistent with current industry practice. Industry and regulatory classification and ranking criteria determine the investigation requirements and reportability for incidents and near miss. Industry ensures that all incidents and/or near miss are reviewed and the level of investigation is determined based on actual and potential severity of the incident or near miss as well as in conjunction with regulatory investigation and reporting guidelines. The policy as stated will place unnecessary demands on the administration and management of incidents or near miss events, that are of concern to industry but do not necessarily warrant formal investigation and regulatory reporting. ***Proposed Policy Text:*** We recommend that a definition for "incident" be included within the definitions section of the document as contained in the D&P Regulations. In the absence of a defined term and specific investigation and reporting criteria, it's unclear what will require formal regulatory reporting and investigation and will result inconsistency in the reporting and investigation of incident and near miss events.
14.9 Notification of Commencement, Completion, Termination or Cancellation	The operator shall immediately notify the Board in writing when a geoscientific, geotechnical or environmental program (a) commences, (b) is completed, and (c) is terminated or cancelled.	***General Comment:*** Although descriptions exists in the Boards Geophysical Guidelines , Industry believe that clear definitions for the following types of programs: Environmental, Geotechnical and Geoscientific are required to facilitate interpretation of regulatory requirements relating to these activities or operations and avoid uncertainty in any reporting requirements. This will also aid in the understanding of the types of activities that are intended to be included under these categories.
14.10 Daily Reports	The operator shall ensure that a copy of the following is provided to the Board daily: (a) the daily well operation report; (b) the daily geological report, including any formation evaluation logs and data; and (c) in the case of a production installation, a summary, in the form of a daily production report, of the records referred to in paragraph 14.5(g) and the daily production record.	***General Comment:*** The following sections (14.10 to 14.23) outline extensive reporting requirements and include significant detail and duplication. It may be possible that these reporting requirements could be consolidated and organized in a more logical manner and perhaps an opportunity exists to reduce and/or eliminate duplication and create a more streamlined approach. The reporting structure could by established based on period (Daily, Weekly, Monthly, Annual and Final) or by Operations category. An example of Operations category structure might be as follow: 14.a Drilling Reports 14.a.b Daily Reporting 14.a.c Well History Report 14.a.d Final Drilling Environmental Report 14.b Production Operations Reports 14.c Geoscientific, Geotrechnical or Environmental Operations Reports

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14.11 Daily Formation Flow Test Records and Reports	The operator shall ensure that (a) in respect of exploration and delineation wells, a record of formation flow test results is submitted to the Board daily; and (b) in respect of all wells, a formation flow test report is submitted to the Board as soon as the circumstances permit, following completion of the test.	
14.12 Daily Production Record	The operator shall ensure that a daily production record, which includes the metering records and other information relating to the production of oil and gas and other fluids in respect of a pool or well, is retained and readily accessible to the Board until the field in which the pool is located is abandoned and at that time shall offer the record to the Board before destroying it.	
14.13 Weekly Geoscience, Geotechnical, Environmental Operations Report	(1) For any geoscientific, geotechnical or environmental program (with field work), the operator shall ensure weekly status reports are provided to the Board from the commencement of the program until its completion, suspension or cancellation.	***General Comment:*** Although descriptions exists in the Boards Geophysical Guidelines, Industry believe that clear definitions for the following types of programs: Environmental, Geotechnical and Geoscientific are required to facilitate interpretation of regulatory requirements relating to these activities or operations and avoid uncertainty in any reporting requirements. This will also aid in the understanding of the types of activities that are intended to be included under these categories.
	(2) The reports required by sub-section (1) shall be in a form and manner prescribed by the Board and shall include, at a minimum:	
	a) the program number assigned by the Board;	
	(b) identification, location and status of the installations, operations site, vessels, vehicles (to include vibroseis, only onshore COGOA) or aircraft undertaking the program;	
	(c) a description of activities undertaken during the preceding week, including (i) key project dates, including commencement, suspension and completion dates, (ii) quantity of data collected, broken down by data acquisition technique; (iii) identification and location of data collection points, lines or areas; (iv) maps illustrating the completed data acquisition program against the proposed data acquisition program; (v) maps illustrating the upcoming data acquisition program; (vi) a time breakdown of program activities including any non-productive time; (vii) a summary of causes of non-productive time; and (viii) confirmation of compliance or of failure to comply with each conditions of the authorization;	***Rationale:*** Section 14.13c contains extensive prescriptive reporting requirements for information to be contained in a Weekly report. Typically this comprehensive reporting and level of detail would constitute the final report. Additionally, it is not typical that Operators would report confirmation of compliance as it is inherent in the applicable regulations, associated approvals and authorization that the Operator and responsible parties will comply. It would be more reasonable to expect the reporting of any areas of non-compliance that may be identified. ***Proposed Policy Text:*** Recommend the limiting of reporting requirements on a weekly basis to summary data and key issues that may require additional information or background. Also recommend the removal of the "confirmation of compliance" requirement under (c) (viii) and rephrase to state "any instance in which there is identified failure to comply with a condition of the authorization".

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	d) for any offshore program (i) the number of persons onboard all installations, vessels or aircraft directly involved in the program; (ii) number of persons transferred by helicopter or vessel directly involved in the program; (iii) communications or interactions with fishing activities; (iv) a summary of any incidents; (v) any wildlife observations or interactions; and (vi) actions taken to avoid interference with wildlife, fishing activities or any other commercial uses of the sea.	***Rationale:*** CAPP believe that the reporting requirements as stated under Section 14.13 (d) are extensive and suggest the following policy changes. ***Proposed Policy Text:*** 1. Recommend remove sections iii, v and vi: these can be included in the general end of program environmental reports. 2. Recommend removing section iv: any incidents requiring reporting will be reported in accordance with the Incident Reporting and Investigation Guidelines, and an incident summary is included in the end of program/annual safety plan. See note in section 14.10 on industry desire to remove complexity and redundancy to minimize both the time and effort required by industry, government and regulators to manage and administer extensive reporting requirements.
	(e) for any onshore geophysical or geotechnical program, the location of any shot hole where water or gas comes to the surface of a shot-hole; (paragraph (e) for COGOA onshore only).	
14.14 Monthly Production Report	The operator shall ensure that a report summarizing the production data collected during the preceding month is submitted to the Board not later than the 15th day of each month.	
	(1) The well history report shall contain a record of all operational, engineering, petrophysical, geophysical and geological information that is relevant to the drilling and evaluation of the well.	
	(2) Every operator shall ensure that (a) a well termination record is provided to the Board within 21 days of the well termination date following the abandonment, suspension, completion or re-completion of a well; (b) a well history report is provided to the Board within 90 days after the well termination date in the case of an exploratory or delineation well or within 45 days after the well termination date in the case of a development well; and (c) where the well operation involves a workover or well intervention, a well operations report is provided to the Board within 30 days of completion of the operation.	***Rationale:*** In reference to the reporting requirements under Section 2 in general, CAPP would like to understand the rationale or basis for the multiple timelines for submission of various well reports and records, such as: - Well Termination Record (21 days) - Exploration Well History Report (90 days) - Delineation Well History Report (90 days) - Development Well History Report (45 days) - Well Operations Report (30 days) ***Proposed Policy Text:*** Recommend that these final well reporting requirements be aligned to a single timeline for submission. Recommend a single Well History report due 90 days from the well termination date. ***Rationale:*** The current definition of "suspended" in the D&P Regulations indicates a well in which drilling or production operations have temporarily ceased. If this definition remains, then is it appropriate to require a well termination report if the well is temporarily suspended for weather or repair issues as opposed to a planned suspension? This statement is also true for the definitions of suspended and terminated contained with the Policy documents. ***Proposed Policy Text:*** CAPP recommend that definitions for suspended and termination be revised to avoid confusion in their application.

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14.15 Final Well History and Operations Report	(3) As applicable, the reports required by paragraphs (1)(b) and (1)(c) shall contain a record of all operational, engineering, petrophysical, geophysical, geological information that is relevant to the well operation, including any problems encountered during the well operation.	***General Comment:*** Our review was based on the assumption that the reference to paragraph 1 (b) and 1 (c) are actually intended to be paragraphs 2 (b) and 2 (c).
	(4) In addition to the requirements of sub-section (2), the report required by paragraph (1) (c) shall describe any impact on the performance of the well including any effect on productivity, injectivity and recovery.	***Rationale:*** At the time of preparing the well history report required under Section 14.15 (a), the performance impact on production, injectivity and recovery of the well may not be known. Full impacts may not be known until much later in well life. ***Proposed Policy Text:*** (4) In addition to the requirements of sub-section (2), the report required by paragraph (1) (c) shall describe any impact that results in material influence on the performance of the well including any effect on productivity, injectivity and recovery known at the time of reporting. Also, it is assumed that the reference to paragraph 1 (c) is actually intended to be paragraph 2 (c).
	(5) The record required by paragraph (1)(a) shall describe the manner in which the well has been abandoned, suspended, completed or re-completed in accordance with these regulations and shall include a schematic of the well illustrating the nature and location of the plugs used to abandon or suspend the well or the equipment used to complete the well.	***General Comment :*** It is assumed that the reference to paragraph 1 (a) is actually intended to paragraph 2 (a).
	(6) The records and reports required by sub-section (1) shall be signed and dated by the operator or the operator's representative.	

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14.16 Well Costs	The operator shall provide to the Board: (a) the detailed estimated cost breakdown of the well operation at the time of an application for well approval; and (b) the actual detailed cost breakdown of the well operation within 90 days of completion of the well operation.	***Rationale:*** As highlighted, there exist significant concern within the industry with respect to Section 14.16 for supplying detailed cost estimates and actual cost data; and, with the additional policy intent described section 14.17 for reporting past and future cost and financial data including commodity prices for a pool, field or zone. Industry is concerned with the additional reporting burden being imposed by policies 14.16 and 14.17 in the absence of any clear justification that the detailed cost and financial information will support any regulatory decisions. Provision of detailed cost breakdowns may impact an Operator's future ability to implement effective competitive bidding processes, cost control measures and their ability to leverage commercial advantage if this information becomes public. With these valid concerns in mind Industry strongly oppose the inclusion of these policy statements and encourage the retention of current financial reporting mechanisms and reporting requirements. ***Proposed Policy Text:*** Recommend the removal of this policy.
14.17 Annual Production Report	The operator shall ensure that, not later than March 31 of each year, an annual production report for a pool, field or zone is submitted to the Board providing information that demonstrates how the operator manages and intends to manage the resource without causing waste, including: (a) for the preceding year, details on the performance, production forecast, reserve revision, reasons for significant deviations in well performance from predictions in previous annual production reports, gas conservation resources, efforts to maximize recovery and the operating and capital expenditures, including the cost of each well operation; and b) "For the preceding year, the current year and the next two years, capital costs and fixed operating costs for each well and field in the project, variable costs, commodity prices and pipeline and transportation commitments."	Refer to Rationale and Proposed Policy Text under Section 14.16
14.18 Final/Annual Safety Report	Within 90 days following completion or suspension of an authorized work or activity, or for an ongoing work or activity (i.e. that will continue into the following calendar year), not later than March 31 of each year, the operator shall ensure that a safety report relating to the preceding calendar year is provided to the Board and includes (a) a summary of safety performance during the applicable calendar year, including with respect to the safety goals identified through the management system; and (b) a discussion of efforts undertaken to improve safety.	***General Comment:*** CAPP support the performance based approach taken in Section 14.18 as the wording is less prescriptive with regards to reporting on safety related incidents and is now focused generally on "safety performance" which industry consider to be a positive change. CAPP would also like to highlight that this section also indicates the annual report should provide a summary "with respect to the safety goals identified through the management system". This is considered a positive step change from the previous version as it relates operators performance directly back to what is stated in their management system.

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14.19 Final Geoscientific, Geotechnical or Environmental Program Environmental Report	For each geoscientific, geotechnical or environmental program the operator shall ensure an environmental report is provided to the Board within 90 days after the operation is completed or suspended and includes (a) a description of the general environmental conditions, during the geoscientific, geotechnical or environmental program and, if applicable, a description of ice management activities and non-productive time caused by weather or ice; (b) a summary of environmental protection measures and mitigation actions taken and a summary of the project's performance with respect to any environmental goals identified through the management system; (c) an analysis of the effectiveness of any mitigation actions taken, and any resulting adjustments or improvements made to the program; and (d) a description of environmental contingency plan exercises.	***Rationale:*** Similar to the comment provided in Section 14.18 in reference to the annual safety plan, Industry encourage and support the wording regarding the annual/final environmental reports to be less prescriptive, and include reference in relating performance to the "environmental goals and objective as identified through the Operators approved management system". Although descriptions exists in the Boards Geophysical Guidelines clear definitions for Environmental, Geotechnical and Geoscientific programs are necessary to facilitate interpretation of proposed policy relating to these operations and avoid uncertainty in reporting requirements. Inclusion of definitions will permit the understanding of the type of operating that is intended to be included under these categories. ***Proposed Policy Text:*** Sections 14.19 and 14.20 may be combined to simplify the reporting requirements as there exist a significant amount of redundant reporting when considering that daily and weekly reports include a large portion of the information that is being requested. Thus, we encourage FORRI to eliminate redundancy and unnecessary reporting to minimize both industry and regulator time and resource efforts to administer and manage these reporting requirements.
14.20 Final Drilling Environmental Report	For each drilling installation for an exploration or delineation well, the operator shall ensure that an environmental report relating to each well is provided to the Board within 90 days after the well termination date and includes: (a) a description of the general environmental conditions during the drilling program and a description of ice management activities and non-productive time caused by weather or ice; and (b) a summary of environmental protection measures and mitigation actions taken and a summary of the project's performance with respect to any environmental goals identified through the management system. c) an analysis of the effectiveness of any mitigation actions taken, and any resulting adjustments or improvements made to the program, and (d) a description of environmental contingency plan exercises.	***Rationale:*** Similar to the comment provided in Section 14.18 and 14.19, Industry encourage and support the use of wording regarding the annual/final environmental reports to be less prescriptive, and include reference in relating performance to the "environmental goals and objective as identified through the Operators approved management system". It is important to note that installation specific Environmental Protection Plans and Compliance Monitoring Plans, or where combined (EPCMP) outline in detail the environmental protection measures in place for drilling. These plans are a requirement of authorization. The requirement to provide a summary as noted in (b) will require the operator to summarize the EPCMP. This is a duplication in reporting with no additional information being provided. The reporting requirements should only include measures not currently stated within Operator approved EPCMP. ***Proposed Policy Text:*** Suggest that b and c could be combined with wording revised to say "any actions identified in the environmental protection plan required under Section 3.5 (from Phase 1 document) and the effectiveness of those actions".
14.21 Final/Annual Production Project Environmental Report	For each production project or offshore (only AA) pipeline project, the operator shall ensure that, not later than March 31 of each year, an annual environmental report relating to the preceding year is provided to the Board and includes (a) for an installation or an operations site a summary of the general environmental conditions during the year; (b)a description of ice management activities; (c) a summary of environmental protection measures and mitigation actions taken, and a summary of the project's performance with respect to any environmental goals identified through the management system; d) an analysis of the effectiveness of the mitigation actions taken and any resulting adjustments or improvements made to the program; and (e) a description of environmental contingency plan exercises.	***Rationale:*** With reference to Section 14.21(d), we are concerned that expectations for a report on the "analysis of the effectiveness of the mitigation actions taken" regarding environmental protection. If this is intended to be an annual summary of measured effects, then the requirement would be unrealistic. Environmental Effects Monitoring and Analysis is conducted at a frequency agreed to with the Board, Environment Canada and Department of Fisheries and Oceans, and has dedicated reports provided following the completion of these extensive programs. ***Proposed Policy Text:*** CAPP recommend that the requirements associated with (d) be removed and that focus be on performance relative to goals, per subsection (C). A definition for "Operations Site" is required to understand the regulatory requirements relating to activities associated with an Operations Site and avoid uncertainty in any reporting requirements.

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14.22 Other Annual Reports	The operator shall ensure that the Board is made aware, at least once a year, of any report containing relevant information regarding applied research work or studies obtained or compiled by the operator relating to the operator's work or activities and that a copy of any report is provided to the Board on request.	***General Comment:*** This section is excessively broad in scope and may be interpreted to cover 'activities' which are not relevant to the authorized activity or within the regulatory scope of the Boards. This clause should be rewritten to apply only to a defined list of activities pertaining to wells or installations or the operator's relevant production operations, not the "activities of the operator." CAPP would also like to understand as to whether the information being provided can be held under some confidentiality provisions.
	(1) The operator shall ensure that the final operations and processing report(s) as defined in subsection (2) of this section and the interpretation report as defined in subsection (3) of this section (if applicable) together with the final processed data are provided to the Board within 12 months of completing any geoscientific, geotechnical or environmental program.	***Rationale:*** The policy as stated does not consider that the finalization of data processing may often take in excess of 12 months to complete and generate the interpretation report. Understanding that this will be the case on occasion, there must be provision within the policy to request an extension. ***Proposed Policy Text:*** "(3) of this section (if applicable) together with the final processed data are provided to the Board, unless otherwise agreed, within 12 months of completing any geoscientific, geotechnical or environmental program".
	(2) The operations and processing report(s) required by sub-section (1) shall be provided in a form and manner prescribed by the Board and shall contain as applicable:	
	(a) the program number assigned by the Board;	
	(b) the title, author and date of the report and the executive summary and table of contents;	
	(c) the names of the operator, contractors and any interest owners;	
	(d) a description of all installations, vessels or aircraft used to execute the program, including any support vessels;	
	(e) a description of the program including	
	(i) key project dates, including commencement, suspension and completion dates,	
	(ii) the equipment used,	
	(iii) the operational methods employed,	
	(iv) the number of crew, and	
	(v) the quantity of data collected, broken down by data acquisition technique;	
	(f) location maps illustrating the data acquisition program including the identification and location of data points, lines or areas and the type of data acquired;	
	(g) location maps that show the boundaries of the area that is subject to each interest covered by the operation and the identification number of each such interest;	
	(h) a time breakdown illustrating the type and duration of all activities including any non-productive time;	

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14.23 Final Geoscientific, Geotechnical or Environmental Program Data Reporting	(i) for any geoscience program, (i) the instrument type, the accuracy and repeatability of the navigation system, the accuracy of the positioning and survey systems, the parameters and configuration of both the energy source and the recording system, and (ii) a description of the geoscience data acquired including the data processing sequence and parameters; and	***Rationale:*** A definition or description of performance expectations for reporting on the "repeatability of the navigation system" is required. A measurement may be said to be repeatable when the measurement variation is smaller than some agreed limit, thus in the absence of defined performance parameters or criteria for measurement repeatability the data would be of limited value. The service provider tool specifications and performance capability are available. However, to demonstrate repeatability of the navigation system, repeat runs would be required and this is not considered a practical option. The demonstration of repeatability, if possible, will take additional time to prove if it must be locally demonstrated and typically the following conditions need to be fulfilled in the establishment of repeatability: - use of the same tools, instruments or devices; - the activity to be conducted by the same observer, operator or technician; - the same measuring parameter and configuration used under the same conditions; - the activity conducted in the same location and environment; and, - the activity repeated over a similar time period. ***Proposed Policy Text:*** We recommend removing the specific request for information pertaining to the repeatability of the navigation system.
	(j) shot point maps, track plots, flight lines with numbered fiducial points, gravity station maps, location maps for any samples or core holes, and any photographs and videos as applicable.	
	(3) Subject to subsection (6), the interpretation report required by sub-section (1) shall be provided in a form and manner prescribed by the Board and shall contain as applicable:	
	(a) bathymetric or topographic maps compiled from the data collected;	
	(b) a written discussion along with interpretative maps that are appropriate to the data collected including (i) structure and isopach maps, structure and interval maps in time and depth, velocity and residual velocity maps, and seismic attribute maps (ii) final Bouguer gravity maps and any residual or other processed gravity maps, (iii) final total magnetic intensity contour maps and any residual, gradient or other processed magnetic maps, (iv) final controlled source electromagnetic resistivity maps, and (v) surficial maps generated from any seabed, geohazard or a pipeline route survey; (vi) any geological maps;	

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	(c) a written discussion of the interpretation with reference to (i) geological and geophysical correlations, (ii), correlations between gravity, magnetic, controlled source electromagnetic and seismic data including correlations to any data acquired during previous surveys, (iii) in the case of seabed surveys, the geophysical correlation of shallow seismic data with data from cores and geotechnical boreholes, (iv) details of corrections or adjustments that were applied to the data during processing or compilation, (v) the operator's velocity information that was used in a time-to-depth conversion, (vi) core and sample descriptions, (vii) geoscientific and geotechnical analyses; (viii) geohazard reports; and	
	d) a description of synthetic seismograms and seismic modelling studies that use synthetic seismograms, vertical seismic profiles at wells that were used in the interpretation of the operation data, amplitude versus offset studies, and any seismic inversion studies.	
	(4) The final reports required by sub-section (1) shall be accompanied by all acquired data in a form and manner prescribed by the Board including, as applicable,	
	(a) track plot, shotpoint location and sample location data, time stamped,	**Rationale:** The ability to provide time stamped track plots, shotpoint locations and sample location data will be determined by the capability of the of the software, survey equipment and data processing systems; subsequently, time-stamped data may only be available when these capabilities exist. Additionally, there maybe hundreds of thousands of shotpoints for a large 3D program, and there can be hundreds of track plots, sometimes with segments re-acquired due to technical problems thus the provision of time stamped data as stated in the policy is likely not achievable. ***Proposed Policy Text:*** (a) track plot, shotpoint location and sample location data, time stamped when available.
	(b) bathymetric data,	
	(c) all final processed seismic data for each 2D seismic line in time and depth,	
	(d) a final processed 3D volume and each line generated from that volume in time and depth,	
	(e) any vertical seismic profiles, synthetic seismograms, amplitude versus offset data or any seismic inversion data,	
	(f) for any seabed, geohazard or a pipeline route survey, (i) processed high-resolution data for each line, (ii) location maps for any samples, and (iii) any photographs and any videos; (iv) sub-bottom profiler and side-scan sonar data;	

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	(g) for any environmental programs, any photographs and any videos;	**Rationale:** As currently worded this policy is all encompassing and impractical to comply with in a reasonable manner. Operators currently include representative photos and videos routinely in summary reports as a matter of good practice. As written the policy could be interpreted that all/any photos and videos collected must be included in the report including non relevant and junk photos or video. ***Proposed Policy Text:*** ".....for any environmental reports, the report must include photos, video or other graphic information that are relevant and contribute materially to the interpretation of the information outlined in the report".
	(h) in the case of a gravity or magnetic survey, a series of gravity and magnetic profiles across all gravimetric and magnetic surveys;	
	(i) in the case of controlled source electromagnetic data, final processed cross-sections on all receiver lines, curves from all receivers and 2D and 3D final models generated.	
	(5) In submitting a map pursuant to subparagraph (3)(b), the operator shall incorporate any previous data collected by the operator that are related to the area covered by the map and that are of a type similar to the data from which the map was produced.	
	(6) An operator who has conducted a non-exclusive survey need not submit an interpretation report required by sub-section (3) provided the data from that survey are available for purchase or lease by the public.	
14.24 Data Purchases	(1) Where an operator who has conducted a non-exclusive survey ceases to make available for purchase or lease any data from that survey, the operator shall ensure that, within 12 months after the date on which the operator ceased to make the data available, the interpretation report specified by sub-section 14.23 (3) is provided to the Board.	
	(2) Every purchaser of geoscientific, geotechnical or environmental data that is in an area that is subject to an interest, where the costs of the purchase of the data are credited against a (work) deposit or rentals requirements of the interest, and every participant, shall submit to the Board an interpretation report specified by sub-section 14.23 (3).	
	(3) Where a purchaser of geoscientific data that from an area that is subject to an interest has reprocessed and/or reinterpreted, as applicable, the data and the costs of the reprocessing are submitted as part of an application to be credited against a (work) deposit or rental requirements of the interest, the purchaser shall submit to the Board a processing report specified by sub-section 14.23 (2), interpretation report specified by sub-section 14.23(3) and any accompanying data as specified by sub-section 14.23 (4).	
	(4) The reports and data required by subsections (2) and (3) shall be submitted by the interest holder prior to the time the costs referred to in subsection (2) or (3) are credited.	
	(5) A person who has submitted a report referred to in this section shall, in respect of data that pertain to the location of shot points or stations, immediately notify the Chief Conservation Officer of any errors, omissions or corrections identified in or made to the data subsequent to the submission of the report.	
	(6) A report referred to in this section shall be submitted in the form and manner approved by the Chief Conservation Officer.	

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14.25 Retention of Geophysical Data	(1) Following completion of any geoscience, geotechnical or environmental program, the operator shall ensure the following information and materials are retained in Canada:	
	(a) all field and final processed data in digital format and a description of the data format;	
	b) any samples; and	
	(c) all other data, observations, readings and supporting information obtained during the program.	
	(2) The Chief Conservation Officer may require an operator to supply the information and materials referred to in subsection (1) in a form and manner determined by the Chief Conservation Officer.	
14.26 Destruction or Removal of Information from Canada	(1) No person shall destroy, discard or remove from Canada any of the information or material referred to in section 14.25 unless the person has given the Chief Conservation Officer not less than 60 days' notice of that intention and, if requested by the Chief Conservation Officer within the notice period, has given the Chief Conservation Officer the information or material or a copy thereof.	
	(2) Information or material referred to in section 14.25 may be removed from Canada without the approval of the Chief Conservation Officer for the purpose of being processed in a foreign country, provided that the information or material is returned to Canada as soon as the processing is complete.	
14.27 Approval by Chief Conservation Officer	The Chief Conservation Officer shall approve the destruction, discarding or removal from Canada of any of the information or material referred to in section 14.25 if the Chief Conservation Officer is satisfied the information or material is not of significant use or value.	