

ACTION PLAN FOR EUB DECISION 2005-060

**COMPTON PETROLEUM CORPORATION (COMPTON)
 APPLICATIONS FOR LICENCES TO DRILL SIX CRITICAL SOUR NATURAL GAS WELLS, REDUCED EMERGENCY PLANNING ZONE,
 SPECIAL WELL SPACING, AND PRODUCTION FACILITIES
 OKOTOKS FIELD**

	ACTION ITEM	REQUIRED ACTION/COMMENTS	REFERENCE: D 2005-060	EUB PROCESS TO ENSURE FOLLOW-UP	STATUS & EVIDENCE
1	Install a permanent production packer	Given that completion operations would yield the highest potential release rate, the Board asked Compton at the hearing to consider the use of a permanent production packer that would be installed prior to the initiation of any completion operations and would not be removed from the well, even in the event of a subsequent packer failure. The adoption of this completion practice would ensure that the highest potential release rate would be that associated with the drilling scenario. The Board notes that Compton committed at the hearing to follow the procedure suggested by the Board, thereby limiting the maximum release rate to below that of the drilling rate. The Board will make this a condition of any well licences that are granted.	P. 20, S. 4.3.3, Paragraph 1	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.

2	Test the functioning of Firefly units to be used during drilling and completion operations	Conduct a test firing of each of the specific Firefly units that would be deployed on site during the drilling and completion of the wells. These tests are to be conducted on site, provided that the testing can be done safely, having regard for the site-specific conditions at the time of the test and obtaining prior agreement to the test from the landowner. If the on-site test is not possible for the aforementioned reasons or any others that it may not be aware of, the Board would accept an off-site test, provided it was conducted immediately prior to the transfer of the Firefly units to the well site. If an off-site test is required, the Board would prefer a site in relatively close proximity, such as a neighbouring farm or gravel pit, if possible, to minimize any travel-induced disruption to the functioning of the units. The Board is aware that this test would reduce the discharges available in each unit from 20 to 19, but is satisfied that the presence of the fuel gas-supplied ignition system would be capable of maintaining ignition if an uncontrolled flow from the well were to extinguish itself.	P. 22, S. 4.3.3, Paragraph 1	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
3	Test the functioning of the under-rig igniter	Test the satisfactory functioning of the under-rig igniter on site before drilling commences.	P. 22, S. 4.3.3, Paragraph 2	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

4	Revise the well licence applications	Revise the sections of the applications addressing drilling, completion, and testing to reflect the commitments and revisions made as a result of the hearing and this decision and resubmit them at the time that it submits any revisions to its ERP.	P. 22, S. 4.3.3, Paragraph 3	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
5	Provide an independent nitrogen booster system during drilling operations	Provide an independent nitrogen booster system connected to the shear ram via a shuttle valve, in addition to the accumulator system and the nitrogen backup system. This booster system must comprise a minimum of three 34 000 kPa, 50 litre nitrogen bottles. These nitrogen bottles must each contain a minimum pressure of 30 000 kPa and be connected to the shuttle valve with a 34 000 kPa fireguard hose. A minimum 34 000 kPa regulator must be installed in the above system and set at 24 000 kPa.	P. 22, S. 4.3.3, Paragraph 4	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
6	Refrain from conducting drilling or completion operations in the critical sour zones of the wells during the months of December, January, and February.	There may be no drilling or completion operations in the critical sour zones of the wells during the months of December, January, and February.	P. 22, S. 4.3.3, Paragraph 5	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

7	Allow for EUB inspection of the rig prior to drill-out of the intermediate casing shoe, prior to removal of the bridge plug during completion operations, and during the testing of each well.	Notify EUB Field Surveillance staff so that detailed inspections may be conducted prior to drill-out of the intermediate casing shoe, prior to removal of the bridge plug during completion operations, and during the testing of each well.	P. 22, S. 4.3.3, Paragraph 6	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
8	Test George White's water well before and after drilling and completion operations	Test the quantity and quality of George White's water well before and after drilling and completion operations.	P. 22, S. 4.3.3, Paragraph 7	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
9	Offer to relocate Gerald White's and George White's families during drilling and completion operations.	The Board is satisfied that the concerns of the White family may be addressed by their relocation during drilling and completion operations. The Board will make it a condition of any licence to require Compton to offer to relocate Gerald White's and George White's families during drilling and completion operations. The Board expects the parties to agree upon the details of the relocation.	P. 24, S. 4.3.5, Paragraph 3	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

10	Cause the Chestermere pipeline to be abandoned or ceased to be used as a sour gas pipeline within the timeframe specified in the LRD agreement.	The Board notes that Compton has committed to cause the Chestermere pipeline to be abandoned or ceased to be used as a sour gas pipeline within the timeframe specified in the LRD agreement. The Board will condition any well licence approvals to reflect this commitment.	P. 30, S. 4.3.9, Paragraph 4	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request..
11	Well licences will expire on January 1, 2008.	With respect to the term of any well licences issued, the Board is not prepared to extend the validity of well licences for a period of three years after issuance. The Board finds that the window for depletion of this reservoir is closing rapidly. The Board will make it a condition of any approval that the licences will therefore expire on January 1, 2008. Licences for wells that have not been spudded by that date will become invalid.	P. 31. S. 4.3.10, Paragraph 2	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.
12	Abandon and remove the wells and surface facility at the 10-13 site no later than July 1, 2021.	The Board will make it a condition of the approvals that the wells and surface facility at the 10-13 site must be abandoned and removed 15 years from the date of the first well licence approval or July 1, 2021, whichever is earlier.	P. 31. S. 4.3.10, Paragraph 3	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.

13	Abandon the 11-24 well within 7.5 years of the date of issuance of the first applied-for well licence.	The Board notes that Compton has committed to abandon the 11-24 well within 7.5 years of the date of issuance of the first applied-for well licence. In light of Compton's stated intention and the integral nature of the early abandonment of facilities to Compton's overall plan for the area, the Board will make this a condition of any licences issued for the applied-for wells.	P. 31. S. 4.3.10, Paragraph 4	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
14	Conduct a major ERP deployment exercise.	The Board notes Compton's commitment to execute an ERP exercise in conjunction with the municipal authorities to the satisfaction of all concerned before drilling commences. The Board will make it a condition of its approvals that Compton may only enter the first sour zone following successful completion of a major ERP deployment exercise.	P. 50, S. 4.5.2, Paragraph 1	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
15	Adhere to Case B drilling and completion scenario unless early drilling results warrant a change. Discuss with all interveners any deviation from Case B prior to submitting a request to the EUB's Operations Group for approval of the requested change.	The Board finds Case B to be the preferred approach to the drilling and completion of the four wells and expects that Compton will adhere to this scenario unless early drilling results warrant a change. The Board directs that a proposal to change the sequence of drilling and completion from that described in Case B be discussed with all of the interveners prior to submitting a request to the EUB's Operations Group for approval of the requested change.	P. 23, S. 4.3.4, Paragraph 2	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

16	Place a stationary air monitor in Gerald White's yard during drilling and completion and for the first three months of production operations.	Regardless of whether Gerald White's family is relocated, the Board directs Compton to place a stationary air monitor in the family's yard during drilling and completion and for the first three months of production operations.	P. 24. S. 4.3.5, Paragraph 4	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.
17	Give consideration to the recommendations of the Whites' experts. Implement all but one of Mr. Picard's recommendations.	The Board directs Compton to give serious consideration to the recommendations provided by the Whites' experts. It appears that in the past, Compton has not followed through on its commitments in this regard. The Board acknowledges that Compton has committed to implement all but one of Mr. Picard's recommendations.	P. 27, S. 4.3.8, Paragraph 6	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.
18	Purge all surface equipment with sweet fuel gas prior to depressurizing the equipment to a portable flare stack during routine maintenance at the 10-13 site.	The Board directs Compton, during all routine maintenance at the 10-13 well site, to purge all surface equipment with sweet fuel gas prior to depressurizing the equipment to a portable flare stack.	P. 27, S. 4.3.8, Paragraph 7	N/A	<i>Complete.</i> Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.

19	Revise the ERP based on a reduced EPZ of 9.7 km in radius and a unified command structure.	The Board directs Compton to revise its ERP based on a 9.7 km EPZ, incorporating a mandatory evacuation zone with a minimum radius of about 5 km. The Board directs that residences and businesses within Compton's proposed reduced EPZ should remain in the evacuation zone. The Board directs Compton to develop its ERP based on an average evacuation zone radius of 5.7 km. Surrounding the evacuation zone (EPZ 1), Compton must provide in its ERP for a sheltering zone of an additional radius of about 4 km (EPZ 2). The combined radius of EPZ 1 and EPZ 2 of 9.7 km would define the size of the reduced EPZ. The concept of the relationship of the zones to one another is illustrated in Figure 2. The Board notes that as a result of the particular situation, evacuation of individuals in the sheltering zone and the EAZ or sheltering within the evacuation zone may also be required as determined by the unified command structure.	P. 39, S. 4.4.5, Paragraph 4	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
20	Consult with developers in the area of the EPZ to determine optimal placement of air monitors on lands currently under development.	In its original ERP, Compton proposed the placement of nine stationary air monitors and described the protocol for dispatching two additional mobile air monitoring units prior to entering the sour zones. The Board concurs with Compton's placement of the air monitors for purposes of EPZ 1, provided that Compton can address Carma's concerns regarding the protection and reliability of the monitors in construction zones. The Board directs Compton to work with the developers in the area to determine optimal placement of the monitors on lands currently under development.	P. 48, S. 4.5.2, Paragraph 1	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

21	Provide, at a minimum, an updated and detailed public information package to all interested parties for review and comment. Discuss with those parties included in the ERP how their concerns have been addressed and the provisions put in place to protect their safety.	The Board acknowledges that some interveners requested an opportunity to review Compton's amended ERP prior to the Board issuing any approval. The Board cautions that ERPs are often voluminous and complex and may include more information than what some parties may find useful. The Board directs Compton to provide, at a minimum, an updated and detailed public information package to all interested parties for review and comment. The Board expects Compton to discuss with those parties included in the ERP how it has incorporated their concerns and the provisions it has put in place to protect their safety.	P. 48, S. 4.5.2, Paragraph 3	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
22	Develop an ERP based on the areas both within and beyond EPZ 1 and EPZ 2.	In addition to the conceptual approaches set out above, the Board directs Compton to develop a comprehensive ERP based on the areas both within and beyond the complementary EPZs (i.e., EPZ 1 and EPZ 2) and to submit the document to the Board for review and approval in the timeframe specified in the following section. The Board expects Compton to consult appropriately with all affected parties prior to submission of a revised ERP.	P. 48, S. 4.5.2, Paragraph 7	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
23	Advise the Board by August 15, 2005, if Compton wishes the Board to continue to process its applications in accordance with the Board's determinations in this decision.	The Board directs Compton to advise the Board by August 15, 2005, if it wishes the Board to continue to process its applications in accordance with the Board's determinations in this decision. If Compton advises the Board that it does not intend to pursue these applications further or if the Board has had no response from Compton by the above referenced date, the Board will consider the applications withdrawn and close its files.	P. 50, S. 5, Paragraph 5	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>

24	File a complete ERP by November 1, 2005.	In the event that Compton elects to pursue approval of its applications, Compton must file a complete ERP by November 1, 2005. Irrespective of the November 1, 2005, deadline for submission of a revised and complete ERP, the quality of the consultation program must not be compromised. Therefore, should Compton not be able to meet the deadline set out by the Board, the Board directs Compton to submit a request for an extension to the deadline to the Board in advance of November 1, 2005. Compton is also required to offer each intervener group the opportunity to offer comment during the development of the revised ERP.	P. 50, S. 5, Paragraph 6	N/A	<p><i>Complete.</i></p> <p>Application closed on January 4, 2006 due to Compton's failure to complete item 19. Letter dated January 4, 2006 to Compton Petroleum is available upon request.</p>
----	--	---	--------------------------	-----	---