

June 4 2020

Enforcement File 20-067

Tourmaline Oil Corp.  
3700, 250 – 6 Avenue SW  
Calgary, Alberta, Canada  
T2P 3H7

Attention: Dean Soucy, Manager; Health, Safety, Environment & Regulatory

**RE: Failure to comply with Section 51(6)(d) and Section 51(6)(j) of Drilling and Production Regulation**

Dear Mr. Soucy,

On November 4 2019, an Aboveground Walled Storage System (AWSS) was erected at pad location 04-25-080-14.

On February 20 2020, BC Oil & Gas Commission (Commission) staff conducted an inspection at Tourmaline Oil Corp. (Tourmaline) location 04-25-080-14. During the inspection, it was noted that an AWSS containing fluids had no obvious secondary containment and was situated in a way that would allow fluids to leave site in the event of a release. It was also noted during the inspection that the logbook on site indicates that no AWSS inspections had been completed since December 14 2019.

On February 24 2020, Commission staff issued an Inspection Report to Tourmaline identifying two deficiencies found in the February 20 2020 inspection. Deficiencies were issued under Section 51(6)(d) and Section 51(6)(j) of the Drilling and Production Regulation.

Section 51(6)(d) of the Drilling and Production Regulation states:

(51) A well permit holder must ensure that formation water, oil, drilling fluid, completion fluid, waste, chemical substances or refuse from a well, tank or other facility do not do any of the following:

(6) A well permit holder who uses an above ground structure with a liner as the primary means of containment to store water-based fluids with a concentration of total dissolved solids greater than 4 000 ppm must ensure that

(d) before the structure is used, a qualified professional verifies that contained fluids will not migrate beyond the lease boundary in the event of a complete containment failure,

Section 51(6)(j) of the Drilling and Production Regulation states:

(51) A well permit holder must ensure that formation water, oil, drilling fluid, completion fluid, waste, chemical substances or refuse from a well, tank or other facility do not do any of the following:

(6) A well permit holder who uses an above ground structure with a liner as the primary means of containment to store water-based fluids with a concentration of total dissolved solids greater than 4 000 ppm must ensure that

(j) when the structure contains fluid, it is inspected daily for leaks and a record of inspection is maintained until the site is decommissioned,

On February 25 2020, Tourmaline admitted to the Commission that they were unable to provide a report from a qualified professional, as none had been completed for the AWSS in question. Tourmaline also admitted that they were unable to provide a record of daily inspection beyond the onsite logbook that was last filled out on December 14 2019.

Tourmaline, on or about November 4 2019, at or near Dawson Creek, in the Province of British Columbia, did fail to comply with Section 51(6)(d) of the Drilling and Production Regulation.

Tourmaline, on or about December 15 2019, at or near Dawson Creek, in the Province of British Columbia, did fail to comply with Section 51(6)(j) of the Drilling and Production Regulation.

It should be noted that on March 6 2020, Tourmaline had the AWSS emptied, cleaned, dismantled and removed off location to address and correct the deficiencies issued on February 24 2020.

If you have any questions or comments, please do not hesitate to contact this office.

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*<original signed by>*

Compliance and Enforcement  
BC Oil and Gas Commission