

Summary of Public Engagement Results

Service Rig Operation Safety Guidelines and Interpretation Notes

March 28, 2025



K'ákshó got'jne xáda k'é hederi ḡedjhtl'é yeriniwé ni dé dúle.
Dene Kádá

Ɂerihlt'is Dëne Sųliné yati t'a huts'elkér xa beyáyati theɂą ɬat'e, nuwe ts'ën yólti.
Dëne Sųliné

Edi gondı dehgáh got'je zhatié k'éé edat'eh enahddhé nide naxets'é edahtí.
Dene Zhatié

Jii gwandak izhii ginjik vat'atr'ijahch'uu zhit yinohthan jí', diits'at ginohkhii.
Dinjii Zhu' Ginjik

Uvanittuaq ilitchurisukupku Inuvialuktun, ququaqluta.
Inuvialuktun

Hapkua titiqqat pijumagupkit Inuinnaqtun, uvaptinnut hivajarlutit.
Inuinnagtun

kīspin ki nitawihtin ē nīhiyawihk ōma ācimōwin, tipwāsinān.
nēhiyawēwin

Tł̄jchö yatı k'èè. Dı wegodi newo dè, gots'o gonede.
Tł̄jcho

Indigenous Languages
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Introduction

The Office of the Regulator of Oil and Gas Operations (OROGO) made the draft *Service Rig Operation Safety Guidelines and Interpretation Notes* (Guidelines) available for public engagement on September 12, 2024. Specific invitations to review the Guidelines and provide comments were issued to:

- Indigenous governments
- Companies holding Operating Licences in OROGO's jurisdiction and the Canadian Association of Petroleum Producers
- Other regulators with whom OROGO interacts because of existing Land Claim Agreements and Memoranda of Understanding
- Federal and territorial departments and agencies
- Selected environmental non-government organizations with an NWT presence

The deadline for comments was January 6, 2025. The following organizations provided feedback:

- Acho Dene Koe First Nation (received on February 11, 2025)
- Heenan Energy Services

This document summarizes the comments received during the public engagement period and the response to these comments.

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Comments and Responses

This section summarizes the comments received and OROGO's responses, starting with general comments and then comments on specific sections of the draft Guidelines.

General Comments

The following table contains the general comments received about the Guidelines and OROGO's responses.

Comments	Responses
Include a section on requirements related to spills or leaks from rig operations that addresses the potential volumes, preventative measures, spill kit contents and locations, etc.	Operators must submit an Environmental Protection Plan and a Contingency Plan containing this information with their application for an Operations Authorization (OA). OROGO reviews and approves these documents before the Regulator issues the OA. The operation cannot proceed without an approved OA. The Land Use Permit issued by the appropriate Land and Water Board also addresses some of these issues. No changes were made to the Guidelines.

Section 1: Introduction

The following table contains the comments received about section 1 of the Guidelines and OROGO's responses.

Comments	Responses
Clarify how alternative approaches to meet the minimum requirements established in the Guidelines will be assessed.	Operators identify most alternative approaches in the application for a Well Approval and they are reviewed by OROGO prior to issuing the Well Approval. The operation cannot proceed without a Well Approval. The <i>Application Guidelines and Interpretation Notes – Well Suspension and Abandonment</i> discuss Well Approval applications. If an operator wishes to change its approach during the operation, the Regulator must approve the change before it can be implemented. Any changes requested must meet or exceed the requirement of the Guidelines based on the proposed operation and wellbore configuration. No changes were made to the Guidelines.

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Comments	Responses
There are several terms used in the Guidelines that would not be considered plain language. Recommend using figures to illustrate various sections of the Guidelines.	<p>The Guidelines are primarily intended for use by operators and service rig crews, who are familiar with the standard industry vocabulary used in the Guidelines. The Plain Language statement in Section 1 has been amended to reflect this distinction.</p> <p>Additional definitions have been added in some sections of the Guidelines for clarity.</p> <p>No additional figures have been added, as they are not required for the primary audience and are not readily obtainable by OROGO.</p>
Provide additional information or guidelines for the user of service rigs on critical sour wells, acid gas wells, and wells without surface casings, if applicable to the areas regulated by OROGO.	<p>There are very few critical sour wells, acid gas wells, or wells without surface casings in OROGO's jurisdiction. The Application statement in Section 1 has been amended, directing operators to contact OROGO before applying for operations on such wells.</p>
Clarify well control equipment requirements for sour gas operations as compared to requirements for critical sour wells.	<p>Any well that produces hydrogen sulphide (H₂S) gas is a sour gas well. Because H₂S is corrosive, the well control equipment used on sour gas wells must meet different standards from the equipment used on sweet gas wells. Section 4.4 of the Guidelines describes these standards. All sour gas well operations in OROGO's jurisdiction must comply with the Guidelines, unless they are classified as "critical sour".</p> <p>A sour well that meets the criteria for location and quantity of H₂S released contained in the table in Section 1 of the Guidelines is classified as "critical sour". If a well is "critical sour", the operator must contact OROGO to discuss the specific service rig requirements for that well operation before applying.</p> <p>No changes have been made to the Guidelines.</p>

Section 2: Sommaire

OROGO did not receive any comments about section 2 of the Guidelines.

Section 3: CAOEC compliance

OROGO did not receive any comments about section 3 of the Guidelines.

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Section 4: Well control equipment

The following table contains the comments received about section 4 of the Guidelines and OROGO's responses.

Comments	Responses
Section 4.2 should reference the requirements for personnel executing these tests as identified in section 8.2.	Section 4.2 now includes a statement that the Rig Manager is accountable for testing well control equipment in compliance with the section. The Guidelines describe the required certifications for a Rig Manager in section 8.2.
Clarify whether replacing parts in the blowout preventer (BOP) would trigger the requirement for another satisfactory pressure test prior to operation.	Section 4.2 now includes a statement that a new, satisfactory pressure test is required after a faulty tubing hanger has been replaced.
Include the closing time requirements from section 4.6.2 in section 4.2.	Section 4.2 now includes a specific reference to the closing time requirements from section 4.6.2 under Expected Three Function Test Results.
Individual rig crew health and safety requirements should also require alert devices (personal H ₂ S monitors) for all operations.	<p>The alert device required in section 4.5 is a piece of equipment connected to the service rig. It alerts all personnel on site of events including BOP drills and well control situations.</p> <p>Section 4.5 now clarifies the purpose of the alert device.</p> <p>The operator's Safety Plan describes the personal protective equipment (PPE) rig crew members must use during the operation. The operator submits the Safety Plan when it applies for an OA. OROGO reviews the Safety Plan and approves it when the OA is issued.</p> <p>Consistent with other Canadian jurisdictions, OROGO requires personal monitors with H₂S sensors on sites where the presence of H₂S is unknown, anticipated, or identified.</p>
Require removable handles on all stabbing valves to facilitate quick and easy installation in an emergency. Ensure cross-over subs to fit all thread profiles of a work string in use during the operation are available.	Section 4.6.1 reflects these changes.
The requirement for accumulator systems to vent outside the building should apply to all well classes, not just Class III.	Section 4.6.2 reflects this change.
Make the requirement for fire retardant sheathing for BOP control hoses explicit in section 4.6.4.	Section 4.6.4 reflects this change.
Clarify the statement on the labelling of circulation manifold valves.	The draft section 4.7.1 states the circulation manifold must "be labelled to identify the fully open and fully closed positions for all valves." This statement is general enough to encompass different ways of labelling the valves. Section 4.7.1 has not been changed.

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Comments	Responses
Clarify the statement on valves or mechanical restrictions in the pressure vessel inlet line.	The statement on mechanical restrictions in pressure vessel inlet lines was moved to section 4.7.5 to clarify its application.
Include a requirement for a pressure relief system and check valve on the pump discharge.	Section 4.7.1 now includes a pressure relief system requirement.
Clarify the precision required in the rig tank fluid volume monitoring system.	Section 4.7.2 now includes a precision requirement for the fluid volume monitoring system.

Section 5: Other equipment on site

The following table contains the comments received about section 5 of the Guidelines and OROGO's responses.

Comments	Responses
Include the requirements of the Canadian Electrical Code CSAC22.1-21 in the Guidelines and reference API RP 500 and CAOEC RP 8.0.	Section 5.1 reflects these changes.
Amend the wording in section 5.2 to require the same level of positive shutoff for all diesel engines in the hazardous location.	Section 5.2 reflects this change.

Section 6: Well site spacing

OROGO did not receive any comments about section 6 of the Guidelines.

Section 7: Specific operations

The following table contains the comments received about section 7 of the Guidelines and OROGO's responses.

Comments	Responses
Review section 7.1 to ensure it applies to tripping during well servicing operations, as opposed to drilling operations.	Section 7.1 has been removed.
Provide a plain language definition of "tripping" in section 7.1.	Section 7.1 has been removed.
Include information on mandatory disclosure associated with overbalanced milling in section 7.2	The reference to mandatory disclosure requirements in section 7.2 was an error and has been removed.
Clarify the compliance requirements associated with overbalanced milling.	Overbalanced milling is the usual well operations situation. There are no additional compliance requirements associated with overbalanced milling other than those captured in section 7.2 of the Guidelines.
Clarify the definition of overbalanced milling.	Section 7.2 now contains an improved definition of overbalanced milling.

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Section 8: Administrative controls

The following table contains the comments received about section 8 of the Guidelines and OROGO's responses.

Comments	Responses
Update section 8.2 to include the mandatory Canadian Association of Energy Contractors (CAOEC) compliance requirements from section 3.	The CAOEC compliance requirements identified in section 3 of the Guidelines apply to equipment, not personnel. Section 8.2 of the Guidelines contains requirements for personnel only.
Amend the crew certification requirements in section 8.2 to reflect the <i>Occupational Health and Safety Regulations</i> for first aid qualifications and to limit the requirement for H ₂ S Alive training to all personnel on site on any well servicing operation where there is a possibility of encountering H ₂ S.	Section 8.2 reflects these changes.
Revise the statement on mandatory suspension of operations where crew certifications do not comply with the Guidelines to allow discretion by the inspector.	Section 8.2 reflects this change.
Describe what is a “rig non-compliance” as identified in section 8.4.	A “rig non-compliance” is any situation where the service rig is not in compliance with the Guidelines. Section 8.4 now includes this clarification.
Clarify the reference to a “three component test” in relation to the testing requirements in section 4.2.	Section 8.4 reflects this change.
Identify industry standard guidelines to mitigate common inspection issues such as invasive species and spills or leaks from vehicles during rig operations.	The Land Use Permit issued by the appropriate Land and Water Board establishes the requirements relating to invasive species and spills or leaks from vehicles. Inspectors from the Department of Environment and Climate Change, GNWT, assess and enforce compliance with these requirements. No changes have been made to the Guidelines.
Include information in section 8.5 on lists of roles and responsibilities, contact information for personnel, and sample reporting sheets.	Lists of roles and responsibilities, contact information for personnel, and sample reporting sheets are in the operator's Safety Plan, Environmental Protection Plan, Contingency Plan, and specific programs for the operation. OROGO reviews and approves these documents during the application process. These documents must also be present at the work site. During their inspections, OROGO inspectors check for the presence and accuracy of these documents and for compliance with the Operations Authorization, Well Approvals, and regulations under OGOA. Section 8.5 is now titled “Onsite documentation for well control” to clarify the purpose of the onsite documentation.

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Comments	Responses
Remove the reference to Maximum Allowable Casing Pressure (MACP), as it is not relevant to well servicing operations.	Section 8.5 reflects this recommendation. MACP has been replaced with maximum operating pressure, which is relevant to well servicing operations.

Conclusion

OROGO thanks the organizations and individuals who took time to review and comment on the draft Guidelines. The Guidelines have been amended to reflect the comments received where possible, while maintaining the integrity of the Guidelines with respect to their objectives.