

# 360 CLOSURE COMMUNICATION

**360 Closure Communication 25-01:** AER releases Bulletin 2025-04 – Directive Updates Related to Liability Management Framework

Monday February 10, 2025

On February 7, 2025, the AER released Bulletin 2025-04 – Effective immediately are new editions of *Directive 001: Requirements for Site-Specific Liability Assessments*, *Directive 011: Estimated Liability*, *Directive 068: Security Deposits*, and *Directive 088: Licensee Life-Cycle Management*. Changes to directives, the Oil and Gas Conservation Rules (OGCR), and the Pipeline Rules were required to meet the [Liability Management Framework](#) policy direction to replace the Liability Management Rating (LMR) and Licensee Liability Rating (LLR) programs.

## Background & Implications

In fall 2025, the AER requested feedback on proposed changes to the Liability Management Framework with the intention of replacing the liability management rating (LMR) program. The feedback has now been reviewed and the new liability management framework is in effect.

The AER has identified the following significant changes:

- Directive 011 has been renamed to “Estimated Liability” and revised to include content regarding estimated liability, including assignment of liability at time of licensing and estimation methods. Reclamation estimates were not updated.
- Licensees will be able to manage wells being assigned groundwater protection through the OneStop Liability Assessment Report and provide missing cementing information, however this is not yet available.
- Site-specific liability assessments (SSLAs) are required before submitting a new application if required based on licence type.
- All SSLAs must now adhere to Directive 001 standards. (10-well-equivalent gas plants that expire in 2025 will receive an automatic one-year extension to assist in this transition.) This transition will require many locations to update or complete Phase 1 and 2 ESA
- Eligibility for orphaning and inclusion in orphan fund levy is now outlined in section 9 and appendix 1 of Directive 011.

Directive 006: Licensee Liability Rating (LLR) Program, Directive 024: Large Facility Liability Management Program (LFP), and Directive 075: Oilfield Waste Liability (OWL) Program have all been repealed.



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Additionally, the LMR is no longer calculated or used by the AER for any purpose and will not be available to licensees.

## Resources

The following regulations and resources referenced above are available for review:

- AER Bulletin 2025-04 - [Bulletin 2025-04: Directive Updates Related to Liability Management Framework](#)
- AER Directive 001 – [Directive 001: Requirements for Site-Specific Liability Assessments](#)
- AER Directive 011 - [Directive 011: Estimated Liability](#)
- AER Directive 068 - [Directive 068: Security Deposits](#)
- AER Directive 088- [Directive 088: Licensee Life-Cycle Management](#)