

OCT 30 2014



Northwest
Territories Office of the Regulator of Oil and Gas Operations

Mr. Paul Dixon
Executive Director
Sahtu Land and Water Board
P.O. BOX 1
FORT GOOD HOPE, NT X0E 0H0

Dear Mr. Dixon:

**Suncor Energy Inc. (Suncor)
Land Use Permit (S14A-006) and Water Licence (S14-L1-004) Application –
Tweed Lake M-47 Well Re-suspension**

This letter is in respect to the Sahtu Land and Water Board (SLWB) request for reviewer comments on the above captioned matter, dated October 10, 2014.

As of 1 April 2014, oil and gas activities in the Northwest Territories outside of excluded areas and the Inuvialuit Settlement Region are regulated by the Government of the Northwest Territories (GNWT) Regulator under the *Oil and Gas Operations Act* (OGOA).

At this time, we have no specific comments on Suncor's submissions and no conditions for attachment to the Sahtu Land and Water Board Land Use Permit and Water Licence.

The re-suspension of the Tweed Lake M-47 well, referred to in Suncor's submissions, will require authorizations under OGOA¹. Accordingly, we provide the following recommendations to the Land and Water Board on the factors to be considered in the preliminary screening under the *Mackenzie Valley Resource Management Act* (MVRMA).

Principal Activities (relating to scoping)

- Construction
- Operation (re-suspension)
- Linear / corridor
- Water intake

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¹ Operations Authorization and Approval to Alter Condition of a Well.



Principal Development Components (relating to scoping)

- Access road
 - Construction
 - Modification
- Automobile, aircraft or vessel movement
- Waste Management
- Site Restoration
- Water Intake

Oil and gas activities in the Northwest Territories, outside of the excluded areas, are regulated under OGOA and the *Oil and Gas Drilling and Production Regulations* (OGDPR), and include well drilling, down-hole completion, hydraulic fracturing, facility construction, production operations and well or facility abandonment. All oil and gas activities regulated under OGOA must meet the Regulator requirements for safety, environmental protection and conservation of resources.

Operator requirements for safety, protection of the environment and conservation of the resources specified in OGOA, the OGDPR, and the *Oil and Gas Occupational Safety and Health Regulations* under the *Safety Act*, will, as appropriate, apply to the proposed activities.

When the Regulator receives an application for the proposed OGOA regulated activities, the SLWB's preliminary screening will be reviewed to inform the Regulator's decision under subsection 124(4) of the MVRMA. The Regulator may decide to adopt the SLWB's preliminary screening as permitted by that subsection.

If you have any questions regarding the above, please contact the undersigned by phone at 867-920-6267 or by email at James.Fulford@gov.nt.ca.

Sincerely,


James Fulford
Executive Director

- c. Mr. John Kerkoven, Senior Advisor
Stakeholder and Aboriginal Relations, Suncor Energy Inc.

Mr. Mark Cliffe-Phillips, Executive Director
Mackenzie Valley Environmental Impact Review Board