



Esther Choi
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December 7, 2021

Mackenzie Valley Land and Water Board
7th Floor, 4922 48 Street
PO Box 2130
Yellowknife, NT, X1A 2P6

Via Email: chotson@mvlwb.com

RE: Water Licence MV2021L1-0011 (Part F, Condition 4) and Land Use Permit MV2021X0018 (Condition 41) Regarding Waste Management Plan for Jean Marie River Project

Dear Mr. Hotson,

Imperial Oil Limited (Imperial) received direction from the Office of the Regulator of Oil and Gas Operations (OROGO) on December 2 indicating that the abandonment work planned for Jean Marie River B-48 well will be postponed following the advice of the Chief Public Health Officer of the Northwest Territories. The letter received is attached to this submission.

Given this change in execution timing, Imperial requests a change in deadline (currently set for December 10, 2021) for Version 1.1 of the Waste Management Plan (WMP). Imperial proposes that an updated WMP be submitted 60 days prior to field execution, which will be planned for the 2022-2023 winter season in light of OROGO's communication.

Additionally, Imperial understands the nature of updates to the WMP required at that time of submission of the updated WMP are: information on selected sewage treatment system that will be used at the camp, confirmation of waste facilities to be used and confirmation of acceptance for any facilities in the Northwest Territories.

Imperial looks forward to a response on the above matter. Should any additional information be required, please contact the undersigned at 587-476-1493 or esther.choi@esso.ca.

Regards,

Esther Choi

Esther Choi, E.I.T.
Project Manager

cc: Tyree Mullaney, MVLWB
Jen Potten, MVLWB
Jaclyn Mersereau, Imperial
Stacey Hunchak, Imperial



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

P.O. Box 1320, Yellowknife, NT X1A 2L9

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Courier Address: 4th floor, 5201 – 50th Avenue, Yellowknife, NT X1A 3S9

Sherri Evers
Vice President
Imperial Oil Limited
505 QUARRY PARK BLVD.
CALGARY AB T2C 5N1

December 2, 2021

Dear Sherri Evers:

Decision:

Deferral of Abandonment Program, Jean Marie River Area (OA-2021-004-IMP)

The Office of the Regulator of Oil and Gas Operations (OROGO) received a notice from the Office of the Chief Public Health Officer (CPHO) recommending the postponement of work associated with Imperial Oil Limited's (Imperial) abandonment program for this upcoming 2021/22 field season.

In light of this information, OROGO is requiring all oil and gas operators to increase inspection frequency on their non-compliant wells and consider how abandonment operations can be conducted in the 2022/23 winter operating season in a manner that minimizes risks of COVID-19 transmission to local communities, contractors and other personnel. OROGO requests that Imperial develop and provide the following:

1. A monitoring plan that identifies more frequent testing and inspection of non-compliant suspended wells. An additional inspection must be added for each non-compliant suspended well in addition to the requirements of Section 5D of the *Well Suspension and Abandonment Guidelines and Interpretation Notes*. The monitoring plan must be submitted to OROGO at oro.go@gov.nt.ca by January 11, 2022.
2. An execution plan to conduct field operations in 2022/23 that meets all requirements of the CPHO's Public Health Order – COVID-19 Directed at Mineral and Petroleum Industry (https://www.gov.nt.ca/covid-19/sites/covid/files/resources/pho_-_mpr_en_2.pdf). The execution plan must be submitted to OROGO at oro.go@gov.nt.ca, with a copy to ProtectNWT at protectnwt@gov.nt.ca, by August 31, 2022.

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If you have any questions, please contact me at (867) 767-9097 or by email at orogo@gov.nt.ca.

Sincerely,



Pauline de Jong
Regulator

c. Esther Choi, Project Manager, Imperial