



Canada Energy
Regulator

Régie de l'énergie
du Canada

Suite 210
517 Tenth Avenue SW
Calgary, Alberta
T2R 0A8

517, Dixième Avenue S.-O.
bureau 210
Calgary (Alberta)
T2R 0A8

File OF-EP-OA-I047-1210 0101
10 March 2020

Jody Crawford, Operations Superintendent
Imperial Oil Resources N.W.T. Limited
1001 Canol Drive
Bag 5000
Norman Wells, NT X0E 0V0
Email Jody.a.crawford@esso.ca

Dear Mr. Crawford:

**Imperial Oil Resources N.W.T. Limited (Imperial)
Norman Wells Operations Proposed Waste Management Facility**

On 12 December 2019, as Chief Conservation Officer of the Canada Energy Regulator (CER), I wrote to you pursuant to s. 54(1)(f) of the *Canada Oil and Gas Operations Act* (COGOA) requesting information regarding your proposed Waste Management Facility (WMF) and your understanding of the regulatory obligations triggered by that facility. In your 30 December 2019 reply, you stated that “[t]he primary regulatory approval for the development of the WMF is [a] Type A Water Licence,” for which Imperial will be applying to the Sahtu Land & Water Board, and that “it is [Imperial’s] understanding that an additional separate application to the CER regarding the construction or operation of the WMF is not required.”

As you are aware, paragraph 4(b) of COGOA states “No person shall carry on any work or activity related to the exploration or drilling for or the production, conservation, processing or transportation of oil or gas in any area to which this Act applies unless... that person is the holder of an authorization issued, before the commencement of operations, under paragraph 5(1)(b) for each such work or activity...”.

Based upon a review of the limited information you have provided, the CER is of the view that components of the proposed WMF may trigger COGOA and the regulatory obligations it imposes. The CER further notes that the WMF is not contemplated in the 31 July 2014 application for your present Operations Authorization, OA-1210-001, and is accordingly not captured in that authorization.

As a result, and barring further information regarding the proposed WMF and the scope and nature of the work it represents, the CER will expect to receive an application for an operations authorization for that work pursuant to paragraph 5(1)(b) of COGOA.

Should you disagree with this expectation, the CER again invites Imperial to provide information regarding the proposed WMF and the rationale as to why a separate application to the CER is not required.

Please contact Shannon Vollema (shannon.vollema@cer-rec.gc.ca) at 403-390-8634 or 1-800-899-1265 if you have any questions regarding this letter.

Yours sincerely,

A handwritten signature in blue ink, consisting of a large, stylized 'C' shape with a vertical line through it and a horizontal line at the top.

Iain Colquhoun
Chief Conservation Officer

cc. Paul Dixon, Executive Director - Sahtu Land and Water Board