



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Specialist Engineering – Completions
Suncor Energy Inc.
150 – 6 AVE SW
CALGARY AB T2P 3E3

Dara Schmidt
Development Lead – Legacy Properties
Suncor Energy Inc.
150 – 6 AVE SW
CALGARY AB T2P 3E3

August 12, 2024

Dear Greg Heffel and Dara Schmidt:

Notice: Non-Compliance with Regulator’s Direction (ACW-2021-SUN-M-47-WID1476, ACW-2021-SUN-A-67-WID1555, and ACW-2021-SUN-O-35-WID1600)

On July 17, 2024, I issued my decision approving Suncor Energy Inc.’s proposed change in abandonment methodology for three wells in the Sahtu Settlement Area:

- Tweed Lake M-47 (WID1476)
- Tweed Lake A-67 (WID1555)
- Bele O-35 (WID1600)

In my decision, I directed Suncor Energy Inc. (Suncor) to submit the following information to OROGO by August 6, 2024, if it wished to proceed with changes to the abandonment programs for these wells based on my approval:

- Existing cement bond logs for the Tweed Lake M-47 and A-67 wells.
- Variation requests for the well approvals associated with the abandonments of the three wells.
- A request for extension to the abandonment deadline for the three wells, if needed, including a comprehensive explanation of steps taken to meet the existing deadline and rationale for the extension request.

The cement bond logs were received by email on July 26, 2024, and again on August 6, 2024. OROGO will review these logs and communicate any concerns to Suncor if necessary.

Also on August 6, 2024, Suncor submitted additional information, as follows:

Variation requests: Suncor describes its process to date in developing the well abandonment programs and states “the formal abandonment methodology variation request submission will be submitted once vendors have been finalized, GM SCVF testing has been completed on or before the approval expiry date”. **This response does not comply with the direction I issued on July 17, 2024.**

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Extension request: Suncor provides a cursory explanation of its apparently unsuccessful efforts to complete the well abandonments by the current deadline of March 31, 2025. Suncor references plans for “2024 preparations operations ... ahead of the spring/summer 2025 abandonment”. **This response does not comply with the direction I issued on July 17, 2024.**

I infer from Suncor’s August 6, 2024, response that it intends to request:

- An extension to the March 31, 2025, abandonment deadline for the three wells because it references operations in spring/summer 2025.
- Variations to its existing well approvals to accommodate changes in the abandonment programs.

The Office of the Regulator of Oil and Gas Operations (OROGO) requires sufficient time to process these requests prior to the expiry of the current approvals on November 1, 2024, and prior to the start of any operations. This timeframe must consider OROGO’s other regulatory responsibilities and staff availability. Suncor’s proposed timeframe for submitting these requests is unclear and does not comply with the direction provided in my letter of July 17, 2024.

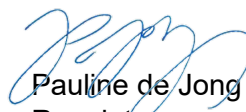
Therefore, I direct Suncor to submit to OROGO no later than 4 p.m. on Monday, September 9, 2024:

- Any variation requests required to ACW-2021-SUN-M-47-WID1476, ACW-2021-SUN-A-67-WID1555, and ACW-2021-SUN-O-35-WID1600; and
- Any request for extension to the March 31, 2025, deadline for abandonment of the Tweed Lake M-47, Tweed Lake A-67, or Bele O-35 wells required.

Submissions may be made by email to orogo@gov.nt.ca or through OROGO’s secure file transfer site.

Failure to comply with the Regulator’s direction may result in enforcement activity, up to and including an order by the Regulator under section 20 of the *Oil and Gas Operations Act*.

Sincerely,


Pauline de Jong
Regulator

