

August 6, 2024

Office of the Regulator of Oil and Gas Operations (OROGO)
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Yellowknife NT
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Email: OROGO@gov.nt.ca

Sent Via Email

Attention: Pauline de Jong, Executive Director, OROGO

Re: Decision: Proposed Abandonment Methodology for the Tweed Lake M-47 (WID1476), Tweed Lake A-67 (WID1555), and Bele O-35 (WID1600) Wells (ACW-2021-SUN-M-47-WID1476; ACW-2021-SUN-A-67-WID1555; and ACW-2021-SUN-O-35-WID1600)

Dear Pauline:

As a follow-up to our pre-application request for operational determination, please find the additional information requested by OROGO as set out in the letter dated July 17, 2024.

We trust that the response provided will satisfy your current requirements and provides suitable documentation for your records. If you have any further questions or concerns, please do not hesitate to contact us.

Thank you,



Greg Heffel

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ATTACHMENTS:

1. Tweed Lake M-47 (WID1476) and Tweed Lake A-67 (WID1555) Wells (ACW-2021-SUN-M-47-WID1476; and ACW-2021-SUN-A-67-WID1555) bond logs.

REQUEST:

If Suncor wishes to proceed with changes to the abandonment programs for the Tweed Lake M-47, Tweed Lake A-67, and Bele O-35 wells based on this decision, Suncor must submit the following information to OROGO by August 6, 2024:

1. Existing cement bond logs for the Tweed Lake M-47 and A-67 wells.
2. Variation requests for ACW-2021-SUN-M-47-WID1476, ACW-2021-SUN-A-67-WID1555, and ACW-2021-SUN-O-35-WID1600 reflecting the change in abandonment methodology approved in this decision.
3. A request for extension to the abandonment deadline for the Tweed Lake M-47, Tweed Lake A-67, and Bele O-35 wells, including a comprehensive explanation of steps taken to meet the existing deadline and rationale for the extension request.

RESPONSE:

1. Cement bond logs.

Refer to the attached for the existing bond logs for the Tweed Lake M-47 and A-67 wells. Suncor has reviewed the bond logs for wells M-47 and A-67 and feel there is sufficient annular isolation at the proposed bridge plug setting depths.

The bond log for O-35 will be performed immediately prior to the abandonment operation and bridge plug setting depth will be determined from the bond log results. This will be communicated to OROGO for agreement on final setting depth. In the event the bond log results do not show appropriate isolation, alternative methodologies will be evaluated dependant on the results obtained.

2. Variation requests reflecting the change in abandonment methodology.

As outlined in the February 21, 2024, decision, the Suspended Well Compliance Assessment for these wells was revised to remove the requirement for remedial isolation of the uncemented portion of the wellbore as Suncor had made a reasonable case for removing this requirement. The decision allowed Suncor to pivot our winter operation planning efforts towards an abandonment program via helicopter. As also recommended in the February decision, Suncor met with OROGO, to discuss technical requirements before designing and submitting an alternative program for approval. As a part of the pre-application stage, Suncor prepared a request for operational determination with a basis for design that outlines the strategy for abandonment. The intent of this request and basis for design was to further understand the technical requirements prior to finalizing design of an alternative program.

It should be noted that since the February 2024 decision, significant work has been done to plan execution options for the project, including evaluation of scheduling that would try to meet the current March 31, 2025 timeline (further discussed in response item three below). Suncor has an internal gated assurance process tied into its vendor selection and detailed engineering and technical design processes. While Suncor has been

engaging with heli-portable rig providers, the procurement process cannot be finalized without Regulator direction/operational determination on whether the basis of design may be authorized past the pre-application stage.

Deliverables for updates to our Operations Authority and Approvals to Alter Condition of the wells will be in advance of the approval expiry date of November 1, 2024, for well approvals ACW-2021-SUN-M-47-WID1476, ACW-2021-SUN-A-67-WID1555, and ACW-2021-SUN-O-35-WID1600.

The formal abandonment methodology variation request submissions will be submitted once vendors have been finalized, GM SCVF testing has been completed on or before the approval expiry date.

With the proposed spring/summer 2025 abandonment planning, Suncor is confident that there will be adequate timeline to collaborate with the OROGO Regulator and technical advisors on approval of the OA/ACW updates and considerations of OROGO's additional terms set for the in the current approvals.

3. Explanation of steps taken to meet the existing deadline and rationale for the extension request.

As noted above, the February 2024 decision allowed Suncor to pivot our planning towards abandonment via helicopter. With the limited timelines available due to barging restrictions in spring 2024, an attempt to complete the project in fall 2024 was deemed not feasible due to the inability to both procure and ship supplies into the area.

As a follow-up, from our last SIR No. 6 submission, Suncor has met with the Chief and the civil engineering and support services contractor of the Behdzi Ahda' First Nation. Suncor provided an update on the project including project tasks, schedule (based on 2025 abandonment), qualification information/EH&S and equipment requirements. The representatives of the Bedzhi Adha First Nation are presently preparing cost estimates and a detailed scope of work with the resourcing/equipment requirements to support the helicopter operations project.

Suncor is confident that the present partnership available with local service companies can support the 2024 preparations operations (laydown area development, supplies and materials shipment), ahead of the spring/summer 2025 abandonment.

A formal submission request for extension to the abandonment deadline will be provided with the detailed abandonment variation OA/ACW submissions on or before November 1, 2024.

ATTACHMENT 1:

BOND LOGS: TWEED LAKE M-47 (WID1476) AND TWEED LAKE A-67 (WID1555) WELLS (ACW-2021-SUN-M-47-WID1476; AND ACW-2021-SUN-A-67-WID1555)

Attachments available from OROGO by emailing orogo@gov.nt.ca