



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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John Hawkins  
Director Asset Management  
Paramount Resources Ltd.  
SUITE 2800, 421 – 7 AVE SW  
CALGARY AB T2P 4K9

October 28, 2022

Dear John Hawkins:

**Decision:**

**Use of Coiled Tubing Unit to Mitigate Risks Associated with Shallow Wellbore Plugs**

On October 19, 2022, Paramount Resources Ltd. (Paramount) submitted its response to Information Request No. 2 for ACW-2022-PAR-2K-29-WID1980. Part of Paramount's submission was a response to Safety Bulletin OROGO-SB-01, which addresses the risks associated with shallow wellbore plugs and requires, along other things, the use of a snubbing unit to mitigate those risks. In its submission, Paramount proposes that a coiled tubing unit could be used to safely remove shallow wellbore plugs, meeting the objectives of OROGO-SB-01 without the use of a snubbing unit.

I have reviewed Paramount's submission and agree that, where it is possible to use a coiled tubing unit to remove a shallow wellbore plug, doing so would be safer than using a service rig with a snubbing unit.

Therefore, I accept the use of a coiled tubing unit to meet the requirements of OROGO-SB-01 as an engineering control to mitigate the risks associated with shallow wellbore plugs. The other requirements of OROGO-SB-01 (on-site risk assessment and hazard analysis; pre- and post-operation reporting) will still apply, with adjustments as needed to reflect the use of a coiled tubing unit.

Paramount's submission was made specifically for ACW-2022-PAR-2K-29-WID1980. However, there are other Paramount wells scheduled for abandonment in 2023 that also contain shallow wellbore plugs. Well approval applications for these abandonments are under review. My decision to accept the use of a coiled tubing unit will also apply to these wells. To reduce the administrative burden on Paramount, I will implement my decision as follows:

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- Applications where no further information requests are needed: My decision will be implemented through conditions to the well approval.
- Applications where additional information requests are needed: My decision will be implemented through the information request process.

If you have any questions, please do not hesitate to contact me at [orogo@gov.nt.ca](mailto:orogo@gov.nt.ca) or 867-767-9097.

Sincerely,



Pauline de Jong  
Regulator