



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

August 16, 2022

Dear John Hawkins:

**Information Request No. 1:
Liard M-25 Well Abandonment (ACW-2022-PAR-M-25-WID1867)**

On August 15, 2022, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application to Alter the Condition of a Well (ACW) from Paramount Resources Ltd. (Paramount) for the abandonment of the Liard M-25 well (WID 1867) in the Fort Liard area of the Northwest Territories.

OROGO has reviewed the information provided by Paramount and requires additional information to complete its review of Paramount's ACW application, as set out in the attached Information Request No. 1.

Please send your written responses and any associated correspondence to OROGO at oro.gov.nt.ca or through OROGO's secure file transfer site, on or before 4:00 pm on August 29, 2022. If you are unable to respond within this timeframe or have any questions, please contact OROGO at 867-767-9097 or by email at oro.gov.nt.ca.

Sincerely,



Pauline de Jong
Regulator

Encl. Information Request No. 1

Information Request No. 1
Liard M-25 Well Abandonment
ACW-2022-PAR-M-25-WID1867

1.1 Shallow Wellbore Plug

Preamble:

The March 25, 2008 wellbore diagram submitted with Paramount's application shows a permanent bridge plug at 75 mKB and possibly another permanent bridge plug at 89 mKB (this plug is not labelled on the diagram but the depth is provided). Step 13 of Paramount's proposed well abandonment program refers to milling out "both plug[s]" at 75 mKB.

In April 2021, the Chief Safety Officer issued a Safety Bulletin on shallow wellbore plugs (OROGO-SB-01). The Safety Bulletin sets out the requirements for operations on wells with known or suspected shallow wellbore plugs. Step 13 of Paramount's proposed well abandonment program refers to the Safety Bulletin and states that it is attached. It is not attached. Paramount's proposed well abandonment program also does not include key aspects of the Safety Bulletin requirements, including:

- Using a snubbing unit;
- Pre-operation hazard assessment; and
- Pre-and-post operation reporting to OROGO.

Request:

Submit an updated well abandonment program that meets the requirements of OROGO-SB-01, including all attachments referred to in the program.

1.2 Abandoned Well Marker

Preamble:

The abandoned well marker diagram included with Paramount's proposed well abandonment program does not reflect the changes made in the revised *Well Suspension and Abandonment Guidelines and Interpretation Notes* (Guidelines), issued in May 2022.

Request:

Submit an updated abandonment program that includes the abandoned well marker requirements found in section 6E of the May 2022 Guidelines.

1.3 Proposed Final Wellbore Diagram

Preamble:

The proposed final wellbore diagram submitted with Paramount's application is dated March 25, 2008 and contains labels that appear to have carried over from the "as is" wellbore diagram in error.

Request:

Submit an updated proposed final wellbore diagram that is:

- Labelled as the proposed final wellbore diagram; and
- Reflects only the proposed final configuration of the wellbore.