



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

P.O. Box 1320, Yellowknife, NT X1A 2L9

Tel: 867-767-9097 • Fax: 867-920-0798 • Web: [www.oro.go.gov.nt.ca](http://www.oro.go.gov.nt.ca)

Courier Address: 4th floor, 5201 – 50th Avenue, Yellowknife, NT X1A 3S9

Duncan MacRae  
Strategic Oil & Gas Ltd.  
c/o Alvarez & Marsal Canada ULC  
SUITE 1100, 250 – 6 AVE SW  
CALGARY AB T2P 3H7

December 1, 2022

Dear Duncan MacRae:

**Information Request No. 1:**  
**Application for a Variation to ACW-2022-SOG-M-31-WID1122**

On November 29, 2022, the Office of the Regulator of Oil and Gas Operations (OROGO) received an application to vary the well abandonment program for the Cameron M-31 well (WID 1122) from Environmental Liability Management Inc. on behalf of Strategic Oil & Gas Ltd. (Strategic).

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

Please send your written responses and any associated correspondence to OROGO at [oro.go@gov.nt.ca](mailto:oro.go@gov.nt.ca) or through OROGO's secure file transfer site, on or before 4:00 p.m. on December 12, 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.go@gov.nt.ca](mailto:oro.go@gov.nt.ca).

Sincerely,

Pauline de Jong  
Regulator

Encl. Information Request No. 1

c. Christopher Gagnon, Environmental Liability Management Inc.

**Strategic Oil & Gas Ltd.**  
**Application for a Variation to Alter the Condition of a Well**  
**Cameron M-31 Well (ACW-2022-SOG-M-31-WID1122)**  
**Information Request No. 1**

### **1.1 Remedial Cementing**

**Preamble:**

The proposed well abandonment program, submitted on November 29, 2022, does not include a contingency plan for if the gas migration proves to originate below the bridge plug at 870 mKB.

Currently, if it is determined the gas is coming from below the cement retainer, the program proposes to mill out the cement retainer at 745 mKB and the bridge plug at 797 mKB and push the packer assembly to the bridge plug at 870mKB. At this point there would be a cement squeeze of the Slave Point perforations followed by remedial perforations and cement squeezes above that point to attempt to terminate the source of the gas migration.

This procedure does not address remedial cementing if it is determined that the origin of the gas contributing to the gas migration is below the bridge plug at 870 mKB or the blanking plug at 990 mKB.

**Request:**

Submit either:

- An updated abandonment program in that addresses the potential for remedial cementing below the Slave Point perforations; or
- Detailed rationale as to why remedial cementing below the Slave Point perforations is not required.

### **1.2 Liner Abandonment**

**Preamble:**

Should the cement retainer at 745 mKB need to be milled out to allow for remedial cementing, the proposed abandonment program does not identify the requirement to abandon the liner with a bridge plug and cement as required by Section 6A off the *Well Suspension and Abandonment Guidelines and Interpretation Notes* (Guidelines).

**Request:**

Submit an updated abandonment program in accordance with section 6A of the Guidelines that includes abandonment of the liner.

**1.3 Proposed Wellbore Diagram****Preamble:**

The proposed well abandonment program, submitted on November 29, 2022, does not include a proposed wellbore diagram that reflects the downhole configuration post abandonment operations.

**Request:**

Submit an updated abandonment program that includes a proposed wellbore diagram that reflects the downhole configuration post abandonment operations.

**1.4 Cut and Cap****Preamble:**

The proposed well abandonment program, submitted on November 29, 2022, includes a request to delay removing the well head and cutting and capping the casing until the frost free months of 2023. The rationale is to avoid having to install a new wellhead if it was determined that the gas migration had not been repaired.

**Request:**

Please submit further information that includes:

- Anticipated timing of gas migration testing in 2023; and
- Anticipated timing of wellhead removal and the cutting and capping of the casing in 2023 should the gas migration be repaired.