



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Duncan MacRae
Vice President, Alvarez & Marsal Canada ULC
SUITE 1100, 250 6 AVE SW
CALGARY AB T2P 3H7

February 9, 2023

Dear Duncan MacRae:

**Information Request No. 2: Application to Abandon
the Cameron B-08 Well (ACW-2023-SOG-B-08-WID1732)**

On January 21, 2023, the Office of the Regulator of Oil and Gas Operations (OROGO) received a well abandonment program from Strategic Oil and Gas Ltd. (Strategic) for the Cameron B-08 (WID 1732) well. OROGO also received Strategic's response to Information Request No. 1 on February 7, 2023.

OROGO has reviewed the information provided by Strategic and requires additional information in order to complete its review of Strategic's application to abandon the Cameron B-08 well, as set out in the attached Information Request No. 2.

Please send your written responses and any associated correspondence to OROGO at oro.go@gov.nt.ca or through OROGO's secure file transfer site on or before 4:00 p.m. on February 23, 2023.

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.

Sincerely,



Pauline de Jong
Regulator

Encl. Information Request No. 2

c Christopher Gagnon, ELM Inc.

Strategic Oil and Gas Ltd.
Application for an Authorization to Alter the Condition of a Well
Cameron B-08 Well (ACW-2023-SOG-B-08-WID1732)
Information Request # 2

2.2 Use of Dump Bailing

Preamble:

The Well Abandonment Program submitted by Strategic on January 21, 2023, for the Cameron B-08 (WID1732) well requests (step 39) an exemption to the *Well Suspension and Abandonment Guidelines and Interpretation Notes* (Guidelines) to allow for the dump bailing of cement on the Keg River abandonment plug.

Strategic's rationale for dump bailing is that "there is inherent difficulty with circulating a cement plug with open perforations above" and that a similar exemption was received for the Cameron I-74 (WID 1792) well. The exemption for the Cameron I-74 well was based on two factors:

1. The proximity of the abandonment plug to the next set of perforation up the wellbore (29 meters in the case of the Cameron I-74 well).
2. The formation above where the cement was to be placed being under pressured.

In its response to Information Request No.1, on February 7, 2023, Strategic provided information on the reservoir pressure for the Sulphur Point formation, above the Keg River formation, to show that it is under pressured. Page 3 of the revised Well Abandonment Program states that the Sulphur Point reservoir pressure is 9480.7 kPa and step 7 of the Well Abandonment Program states that the formations are under pressured.

However, Strategic did not address the proximity of the Keg River abandonment plug to the Sulphur Point formation in the Cameron B-08 well. In the Proposed Well Diagram submitted with its original application (a revised Proposed Well Diagram was not submitted in response to Information Request No.1), Strategic shows:

- A permanent bridge plug at 1501 mKB, with 20.1 meters of cement plug above it, to abandon the Keg River perforations.
- The deepest set of Sulphur Point perforations beginning at 1421 mKB.

Therefore, there is 80 meters between the top of the permanent bridge plug over the Keg River perforations and the nearest Sulphur Point perforations.

More information is required to support Strategic's request for an exemption to the requirement for circulated cement plugs.

Request:

Please provide a rationale for using dump bailing to place the cement plug over the Keg River permanent bridge plug that addresses the distance between the permanent bridge plug and the under-pressured Sulphur Point perforations. The rationale should include evidence to support a minimum distance required to circulate a cement plug under these circumstances, as required under the *Well Suspension and Abandonment Guidelines and Interpretation Notes*.

If the evidence shows a minimum required distance of less than 80 meters, please submit an updated Well Abandonment Program that includes circulating the cement plug in place during the abandonment of the Keg River perforations.