



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

February 5, 2025

Dear Duncan MacRae:

**Cameron Hills Field: Fulfillment of the October 4, 2019, Order of the Regulator**

On January 24, 2025, we met, along with staff of the Office of the Regulator of Oil and Gas Operations (OROGO) and representatives of the GNWT's Department of Environment and Climate Change (GNWT-ECC), to discuss the status of work undertaken by Alvarez & Marsal (A&M), Receiver for Strategic Oil & Gas Ltd., to bring the Cameron Hills field into compliance with the October 4, 2019, Order of the Regulator (2019 Order). During that meeting, I committed to reviewing the 2019 Order against the work completed to date and responding in writing.

In my review of the 2019 Order, I considered:

1. The six components of the 2019 Order, as issued by the Regulator.
2. Any amendments to the deadlines in the 2019 Order, as agreed to by the Regulator in a stand-alone decision letter or as part of a Well Approval.
3. Commitments made by A&M in well suspension and abandonment programs, which form part of the Terms of each Well Approval (Term 3: "Strategic Oil & Gas Ltd. shall cause the approved work and activities to be conducted in accordance with the specifications, standards and other information referred to in its application dated [various dates] and subsequent submissions."). Well Approvals are issued under the Operations Authorization for the Cameron Hills field (OA-2018-003-SOG). The *Oil and Gas Operations Act* (OGOA) requires compliance with the Terms of an Operations Authorization, including the Terms of a Well Approval.
4. Well History Reports and Post-Abandonment Gas Migration Test Reports submitted by A&M.
5. Inspection Reports, Notices, and Orders issued by the Chief Safety Officer / Chief Conservation Officer and the Safety Officer / Conservation Officer appointed by the Regulator under OGOA.

.../2

Each component of the 2019 Order is discussed in detail in Attachment A. In summary:

- Component 1 of the 2019 Order is fulfilled.
- Component 2 of the 2019 Order is partially fulfilled.
- Component 3 of the 2019 Order is partially fulfilled.
- Component 4 of the 2019 Order is partially fulfilled.
- Component 5 of the 2019 Order is fulfilled.
- Component 6 of the 2019 Order is partially fulfilled (as of February 5, 2025; the deadline for completion of this component is March 31, 2025).

If you have any further questions about the status of the Cameron Hills field or the 2019 Order, please do not hesitate to contact our office at [orogo@gov.nt.ca](mailto:orogo@gov.nt.ca).

Sincerely,



Pauline de Jong  
Regulator

- c. Nathen Richea, ADM, Regulatory, Assessment and Authorizations, GNWT-ECC  
Lorraine Seale, Director, Impact Assessment and Security Management, GNWT-ECC  
Jaida Ohokannoak, Regulatory and Securities Specialist, GNWT-ECC

## Attachment A: Detailed Review of the October 4, 2019, Order of the Regulator

All documents referenced in this attachment may be found on OROGO's public registry: [orogo.gov.nt.ca/en/registry](http://orogo.gov.nt.ca/en/registry).

All references to Guidelines mean the *Well Suspension and Abandonment Guidelines and Interpretation Notes*.

Note that the Cameron B-38 well (WID2002) was not listed in the 2019 Order as it was reclassified from Abandoned to Suspended on September 24, 2020. On July 9, 2021, the deadline for the abandonment of the Cameron B-38 well was established as March 31, 2023, at A&M's request. Abandonment operations were carried out in winter 2023 and the Cameron B-38 (WID2002) well's status was changed to Abandoned and Compliant on June 16, 2023. No deficiencies were found during the post-abandonment inspection of the well.

**Component 1: Repair the surface casing vent flow (SCVF) at the Cameron I-73 (WID1937) well as soon as practicable and by no later than April 1, 2020, in accordance with section 62(3) of OGOA.**

OROGO's records show the Cameron I-73 (WID1937) well was repaired under ACW-2019-003-SOG-I-73-WID1937 prior to April 1, 2020. On September 10, 2020, OROGO inspected the Cameron I-73 well and found no SCVF, confirming the repair. Therefore, component 1 of the 2019 Order has been fulfilled.

**Component 2: Suspend the Cameron J-62 (WID1158), Cameron A-03 (WID2047) and Cameron I-73 (WID1937) wells by April 1, 2020, and abandon them no later than 6 years after the suspension is completed, as required under section 6 of the Guidelines.**

OROGO's records show the suspension operations on the Cameron J-62 (WID1158), Cameron A-03 (WID2047), and Cameron I-73 (WID1937) wells were completed before April 1, 2020. The status of the wells was changed to Suspended Compliant on June 2, 2020, after OROGO's review of the Well Operations Reports submitted by the operator. The suspension requirements under component 2 of the 2019 Order have been fulfilled.

Under the 2019 Order, the abandonment deadline for these wells was June 1, 2026 (no more than six years after the suspension was completed on June 2, 2020). However, A&M subsequently submitted applications for Well Approvals to complete the abandonments by an earlier date and these applications were approved by the Regulator. Therefore, the earlier abandonment dates became part of the Terms of the Well Approvals and are captured in Table 1.

Page 8 of the 2019 Order states that “all suspensions and abandonments shall be completed in accordance with the Guidelines”. Compliance with Guidelines issued by the Regulator is also required under Term 2 of Well Approvals issued by the Regulator.

Table 1 shows the abandonment status of the Cameron J-62 (WID1158), Cameron A-03 (WID2047), and Cameron I-73 (WID1937) wells.

**Table 1: Status of Cameron J-62 (WID1158), Cameron A-03 (WID2047), and Cameron I-73 (WID1937) Well Abandonments**

WID	Well Name	Date Status Changed to Abandoned and Compliant with Guidelines*	Deficiencies Identified During September 17-19, 2024, Inspection	Date(s) Deficiencies Communicated to Operator^	Estimated End of Operations from Application
1158	Cameron J-62	November 21, 2023	Backfill at well centre not completed appropriately; cellar not removed; signage not compliant with Guidelines	September 25, 2024 <sup>1</sup> October 2, 2024 <sup>2</sup> October 18, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>	February 13, 2023
1937	Cameron I-73	November 21, 2023	Cellar not removed; excavation at well centre filled with metal debris	October 2, 2024 <sup>2</sup> November 13, 2024	January 20, 2023
2047	Cameron A-03	November 6, 2023	None	N/A	January 20, 2023

\* Based on Well Operations Reports submitted by A&M.

^ All deficiencies were communicated in inspection reports issued between October 15 and November 14, 2024. In addition, some deficiencies were communicated on the dates listed in the table by (1) Notice from the Chief Safety Officer on September 25, 2024, (2) Notice from the Chief Safety Officer on October 2, 2024, (3) Notice of Non-Compliance: Failure to Comply with Chief Safety Officer’s Direction from the Regulator on November 29, 2024, or (4) Order of the Chief Safety Officer (ORD-2024-001-SOG) on December 17, 2024.

The abandonment operations were carried out in winter 2023 and, based on Well Operations Reports submitted by A&M, the well statuses were changed to Abandoned Compliant on the dates listed in Table 1. However, subsequent inspections identified deficiencies in the abandonment operations for the Cameron J-62 (WID1158) and Cameron I-73 (WID1937) wells, as described in Table 1. The deficiencies demonstrate the abandonment operations were not completed in compliance with the requirements of the Well Approvals and, with respect to the deficiencies in signage, with section 6E of the Guidelines. Therefore, until the deficiencies are addressed, the requirements of component 2 of the 2019 Order are fulfilled for the Cameron A-03 (WID2047) well and unfulfilled for the Cameron J-62 (WID1558) and Cameron I-73 (WID1937) wells.

**Component 3: Abandon the wells listed in Table 2 by January 31, 2023.**

Under the 2019 Order, the abandonment deadline for the wells listed in Table 2 was January 31, 2023. However, the abandonment deadline for these wells was extended at A&M’s request, as follows:

- On February 22, 2021, the abandonment deadline for the Cameron F-73, 2F-73, I-74, J-04, I-10, B-25, L-44, M-74, F-75, E-07, and M-31 wells was extended to March 31, 2023.
- On July 9, 2021, the abandonment deadline for the Swede G-21 and Cameron A-73, N-28, J-37, L-29, M-49, C-50, A-68, N-06, C-16, F-77, and 2B-09 wells was extended to March 31, 2023.

Page 8 of the 2019 Order states that “all suspensions and abandonments shall be completed in accordance with the Guidelines”. Compliance with Guidelines issued by the Regulator is also required under Term 2 of Well Approvals issued by the Regulator.

Table 2 shows the abandonment status of the wells listed under component 3 of the 2019 Order.

**Table 2: Status of the Component 3 Well Abandonments**

<b>WID</b>	<b>Well Name</b>	<b>Date Status Changed to Abandoned and Compliant with Guidelines*</b>	<b>Deficiencies Identified During September 17-19, 2024, Inspection</b>	<b>Date(s) Deficiencies Communicated to Operator^</b>
1122	Cameron M-31	October 2, 2024	Signage not compliant with Guidelines	November 14, 2024
1492	Cameron I-10	February 21, 2024	None	N/A
1608	Cameron C-50	June 16, 2023	None	N/A
1743	Cameron L-44	June 9, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	October 31, 2024
1746	Cameron A-68	June 16, 2023	Backfill at well centre not completed appropriately; cellar not removed; signage not compliant with Guidelines	September 25, 2024 <sup>1</sup> October 2, 2024 <sup>2</sup> October 25, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>
1747	Cameron A-73	June 16, 2023	Signage not compliant with Guidelines	October 29, 2024
1751	Cameron J-37	June 16, 2023	None	N/A
1753	Cameron N-28	June 16, 2023	None	N/A

<b>WID</b>	<b>Well Name</b>	<b>Date Status Changed to Abandoned and Compliant with Guidelines*</b>	<b>Deficiencies Identified During September 17-19, 2024, Inspection</b>	<b>Date(s) Deficiencies Communicated to Operator^</b>
1756	Cameron B-25	June 9, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	September 25, 2024 <sup>1</sup> October 18, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>
1764	Swede G-21	June 16, 2023	None	N/A
1792	Cameron I-74	June 9, 2023	Backfill at well centre not completed appropriately; cellar not removed; rat hole on well site not filled	September 25, 2024 <sup>1</sup> October 2, 2024 <sup>2</sup> October 18, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>
1971	Cameron F-75	June 9, 2023	Signage not compliant with Guidelines	November 13, 2024
1974	Cameron M-49	June 16, 2023	None	N/A
1992	Cameron F-73	June 9, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	October 31, 2024
2001	Cameron C-16	June 16, 2023	None	N/A
2025	Cameron 2F-73	June 9, 2023	Backfill at well centre not completed appropriately	November 1, 2024
2034	Cameron J-04	February 21, 2024	Backfill at well centre not completed appropriately	September 25, 2024 <sup>1</sup> October 25, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>
2041	Cameron L-29	February 21, 2024	None	N/A
2042	Cameron E-07	June 9, 2023	Signage not compliant with Guidelines	November 14, 2024
2063	Cameron M-74	June 9, 2023	None	N/A
2065	Cameron F-77	June 16, 2023	None	N/A
2067	Cameron N-06	June 16, 2023	None	N/A
2071	Cameron 2B-09	June 16, 2023	None	N/A

\* Based on the Well Operations Reports submitted by A&M.

^ All deficiencies were communicated in inspection reports issued on the dates listed in the table. In addition, some deficiencies were communicated on the dates listed in the table by (1) Notice from the Chief Safety Officer on September 25, 2024, (2) Notice from the Chief Safety Officer on October 2, 2024, (3) Notice of Non-Compliance: Failure to Comply with Chief Safety Officer's Direction from the Regulator on November 29, 2024, or (4) Order of the Chief Safety Officer (ORD-2024-001-SOG) on December 17, 2024.

The abandonment operations were carried out in winter 2023. Based on the Well Operations Reports submitted by A&M and, in some cases, Post-Abandonment Gas Migration Test Reports, the well statuses were changed to Abandoned Compliant on the dates listed in Table 2. However, subsequent inspections identified deficiencies in the abandonment operations for certain wells, as described in Table 2. The deficiencies demonstrate the abandonment operations were not completed in compliance with the requirements of the Well Approvals and, with respect to the deficiencies in signage, with section 6E of the Guidelines. Therefore, until the deficiencies are addressed, the requirements of component 3 of the 2019 Order are unfulfilled for all wells with deficiencies identified in Table 2 and fulfilled for the remaining wells listed in Table 2.

**Component 4: Abandon the wells listed in Table 3 by May 14, 2025.**

Under the 2019 Order, the abandonment deadline for the wells listed in Table 3 was May 14, 2025. However, A&M subsequently submitted applications for Well Approvals to complete the abandonments by an earlier date and these applications were approved by the Regulator. Therefore, the earlier abandonment date became part of the Terms of the Well Approvals and are captured in Table 3.

Page 8 of the 2019 Order states that “all suspensions and abandonments shall be completed in accordance with the Guidelines”. Compliance with Guidelines issued by the Regulator is also required under Term 2 of Well Approvals issued by the Regulator.

Table 3 shows the abandonment status of the wells listed under component 4 of the 2019 Order.

**Table 3: Status of the Component 4 Well Abandonments**

<b>WID</b>	<b>Well Name</b>	<b>Date Status Changed to Abandoned and Compliant with Guidelines*</b>	<b>Deficiencies Identified During September 17-19, 2024, Inspection</b>	<b>Date(s) Deficiencies Communicated to Operator^</b>	<b>Estimated End of Operations from Application</b>
0376	Cameron A-05	November 6, 2023	Signage not compliant with Guidelines	November 13, 2024	January 25, 2023
1482	Cameron I-16	November 10, 2023	Signage not compliant with Guidelines	November 13, 2024	February 5, 2023
1732	Cameron B-08	November 6, 2023	Signage not compliant with Guidelines	November 14, 2024	January 30, 2023
1736	Cameron L-47	November 21, 2023	None	N/A	January 25, 2023
1765	Cameron M-73	November 24, 2023	Backfill at well centre not completed appropriately	October 18, 2024	February 4, 2023
1767	Cameron C-19	November 6, 2023	None	N/A	January 25, 2023
1793	Cameron C-75	November 10, 2023	None	N/A	January 30, 2023
1939	Cameron C-74	November 6, 2023	Backfill at well centre not completed appropriately; cellar not removed	October 2, 2024 <sup>2</sup> November 13, 2024	January 20, 2023
1940	Cameron H-03	November 22, 2023	None	N/A	January 20, 2023

<b>WID</b>	<b>Well Name</b>	<b>Date Status Changed to Abandoned and Compliant with Guidelines*</b>	<b>Deficiencies Identified During September 17-19, 2024, Inspection</b>	<b>Date(s) Deficiencies Communicated to Operator^</b>	<b>Estimated End of Operations from Application</b>
1972	Cameron K-74	November 22, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	October 25, 2024	January 20, 2023
1973	Cameron D-49	November 10, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	September 25, 2024 <sup>1</sup> October 15, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>	February 1, 2023
1975	Cameron H-58	November 10, 2023	Signage not compliant with Guidelines	November 12, 2024	January 25, 2023
2026	Cameron 2M-73	November 24, 2023	Backfill at well centre not completed appropriately	September 25, 2024 <sup>1</sup> October 18, 2024 November 29, 2024 <sup>3</sup> December 17, 2024 <sup>4</sup>	February 5, 2023
2032	Cameron J-74	November 22, 2023	Backfill at well centre not completed appropriately; signage not compliant with Guidelines	November 13, 2024	February 5, 2023
2033	Cameron L-73	November 24, 2023	Backfill at well centre not completed appropriately;	November 13, 2024	January 20, 2023
2045	Cameron L-40	November 21, 2023	Signage not compliant with Guidelines	November 6, 2024	February 3, 2023
2073	Cameron 2H-03	November 22, 2023	None	N/A	January 20, 2023

\* Based on the Well Operations Reports submitted by A&M.

^ All deficiencies were communicated in inspection reports issued on the dates listed in the table. In addition, some deficiencies were communicated on the dates listed in the table by (1) Notice from the Chief Safety Officer on September 25, 2024, (2) Notice from the Chief Safety Officer on October 2, 2024, (3) Notice of Non-Compliance: Failure to Comply with Chief Safety Officer's Direction from the Regulator on November 29, 2024, or (4) Order of the Chief Safety Officer (ORD-2024-001-SOG) on December 17, 2024.

The abandonment operations were carried out in winter 2023. Based on the Well Operations Reports submitted by A&M and, in some cases, Post-Abandonment Gas Migration Test Reports, the well statuses were changed to Abandoned Compliant on the dates listed in Table 3. However, subsequent inspections identified deficiencies in the abandonment operations for certain wells, as described in Table 3. The deficiencies demonstrate the abandonment operations were not completed in compliance with the requirements of the Well Approvals and, with respect to the deficiencies in signage, with section 6E of the Guidelines. Therefore, until

the deficiencies are addressed, the requirements of component 4 of the 2019 Order are unfulfilled for all wells with deficiencies identified in Table 3 and fulfilled for the remaining wells listed in Table 3.

**Component 5: Decommission the gathering system in place at Cameron Hills by March 31, 2025, in accordance with the scope of work of OA-2018-003-SOG and commitments made by Strategic in its OA application and related submissions.**

Under the 2019 Order, the deadline for decommissioning the gathering system at the Cameron Hills field is March 31, 2025. OROGO's records show the gathering system at the Cameron Hills field was decommissioned prior to March 31, 2023. Therefore, component 5 of the 2019 Order has been fulfilled.

**Component 6: Remove all other oil and gas infrastructure in place at Cameron Hills by March 31, 2025, in accordance with the scope of work of OA-2018-003-SOG and commitments made by Strategic in its OA application and related submissions.**

Under the 2019 Order, the deadline for removing all other oil and gas infrastructure from the Cameron Hills field is March 31, 2025. While the March 31, 2025, deadline has not yet passed, an inspection of the Cameron Hills field on September 17 to 19, 2024, identified the following concerns:

- Cameron L-47 (WID1736) wellsite: a bulk tank liner and grounding cable remain on the site and must be removed.
- Cameron M-73 (WID1765) wellsite: pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.
- Cameron K-74 (WID1972) wellsite: pilings (or casings) associated with oil and gas infrastructure, detached sections of casing, and other debris remain on the site and must be removed.
- Cameron 2M-73 (WID2026) wellsite: pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.
- Cameron 2H-03 (WID2073) wellsite: pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.
- Well site identification and directional signs along access roads and lease entrances remain at the field and must be removed.
- Pipeline identification and hazard signs along the pipeline right of ways remain at the field and must be removed.

These concerns were communicated to A&M by Notice from the Chief Safety Officer on September 25, 2024, Notice from the Chief Safety Officer on October 2, 2024, or the inspection reports issued between October 15 and November 14, 2024. The concerns at the Cameron 2H-03 (WID2073) wellsite were also the subject of a Notice of Non-Compliance: Failure to Comply with Chief Safety Officer's Direction issued on November 29, 2024, and an Order of the Chief Safety Officer (ORD-2024-001-SOG) issued on December 17, 2024.

If these concerns are not resolved before March 31, 2025, component 6 of the 2019 Order will be partially unfulfilled.