



March 7, 2025

Pauline de Jong
 Office of the Regulator of Oil and Gas Operations
 P.O. Box 1320, Yellowknife, NT, X1A 2L9

Attention: Pauline de Jong, Regulator, Executive Director (via email: Pauline_DeJong@gov.nt.ca)

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

As you are aware, on January 28, 2020 (the “**Receivership Date**”), the Court of King’s Bench of Alberta granted an Order pursuant to section 243 of the Bankruptcy and Insolvency Act, RSC 1985, c. B-3 and section 13(2) of the Judicature Act, RSA 2000, c. J-2, whereby Alvarez and Marsal Canada Inc. (the “**NWT Receiver**”) was appointed Receiver, without security, of all of Strategic Oil and Gas Ltd. and Strategic Transmission Ltd. (collectively, “**Strategic**” or the “**Company**”) current and future assets, undertakings and properties of every nature and kind whatsoever situated in the Northwest Territories, including all proceeds thereof and including, without limited in the generality of the foregoing, any letters of credit issued in respect of assets situated in the Northwest Territories (the “**NWT Property**”). For further information, please visit the NWT Receiver’s website at: www.alvarezandmarsal.com/sog.

As you are also aware, the Regulator (“**Regulator**”) of the Office of the Regulator of Oil and Gas Operations (“**OROGO**”) issued an order to Strategic on October 4, 2019, entitled Order of the Regulator (the “**2019 Order**”). The Chief Safety Officer of OROGO issued an order on December 17, 2024 (the “**2024 Safety Order**”) dealing with various safety matters.

Thank you for your correspondence dated February 5, 2025 (the “**Status Letter**”), in which you have outlined, on behalf of the Regulator, the components of the 2019 Order that have been fulfilled or partially fulfilled.

This letter is intended to give an update on the four components which remain partially fulfilled under the 2019 Order, as outlined in the Status Letter, and to request an extension to complete the outstanding deficiencies thereunder. As communicated to OROGO’s Chief Safety Officer earlier this week, the NWT Receiver intends to temporarily address the safety concerns in the 2024 Safety Order by May 15, 2025.

Component 2

WID	Well Name	Deficiencies	Deadline	Extension Request
1158	Cameron J-62	<ul style="list-style-type: none"> • Backfill at well centre not completed appropriately; • Cellar not removed; • Signage not compliant with Guidelines. 	November 21, 2023	April 30, 2027*^
1937	Cameron I-73	<ul style="list-style-type: none"> • Cellar not removed; • Excavation at well centre filled with metal debris. 	November 21, 2023	April 30, 2027*

^ temporary metal fencing to be installed to address safety concerns in 2024 Safety Order by May 15, 2025

* further extensions may be requested pending feedback from engagement, the Mackenzie Valley Land and Water Board and other various stakeholders

Component 3

WID	Well Name	Deficiencies	Deadline	Extension Request
1122	Cameron M-31	• Signage not compliant with Guidelines.	October 2, 2024	April 30, 2027*
1743	Cameron L-44	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	June 9, 2023	April 30, 2027*
1746	Cameron A-68	• Backfill at well centre not completed appropriately; • Cellar not removed; • Signage not compliant with Guidelines.	June 16, 2023	April 30, 2027*^
1747	Cameron A-73	• Signage not compliant with Guidelines.	June 16, 2023	April 30, 2027*
1756	Cameron B-25	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	June 9, 2023	April 30, 2027*^
1792	Cameron I-74	• Backfill at well centre not completed appropriately; • Cellar not removed; • Rat hole on well site not filled.	June 9, 2023	April 30, 2027*^
1971	Cameron F-75	• Signage not compliant with Guidelines;	June 9, 2023	April 30, 2027*~
1992	Cameron F-73	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	June 9, 2023	April 30, 2027*
2025	Cameron 2F-73	• Backfill at well centre not completed appropriately.	June 9, 2023	April 30, 2027*
2034	Cameron J-04	• Backfill at well centre not completed appropriately.	February 21, 2024	April 30, 2027*^
2042	Cameron E-07	• Signage not compliant with Guidelines.	June 9, 2023	April 30, 2027*
<p>^ temporary metal fencing to be installed to address safety concerns in 2024 Safety Order by May 15, 2025</p> <p>* further extensions may be requested pending feedback from engagement, the Mackenzie Valley Land and Water Board and other various stakeholders</p> <p>~ confirmation requested by the Department of Environment and Climate Change that rat hole and mouse hole are backfilled. NWT Receiver will undertake to determine if this poses as a safety issue, and, if backfilling has not been completed, will temporarily address by May 15, 2025.</p>				

Component 4

WID	Well Name	Deficiencies	Deadline	Extension Request
0376	Cameron A-05	• Signage not compliant with Guidelines.	November 6, 2023	April 30, 2027*
1482	Cameron I-16	• Signage not compliant with Guidelines.	November 10, 2023	April 30, 2027*
1732	Cameron B-08	• Signage not compliant with Guidelines.	November 6, 2023	April 30, 2027*
1765	Cameron M-73	• Backfill at well centre not completed appropriately.	November 24, 2023	April 30, 2027*
1939	Cameron C-74	• Backfill at well centre not completed appropriately; • Cellar not removed.	November 6, 2023	April 30, 2027*
1972	Cameron K-74	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	November 22, 2023	April 30, 2027*
1973	Cameron D-49	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	November 10, 2023	April 30, 2027*^
1975	Cameron H-58	• Signage not compliant with Guidelines.	November 10, 2023	April 30, 2027*
2026	Cameron 2M-73	• Backfill at well centre not completed appropriately.	November 24, 2023	April 30, 2027*^
2032	Cameron J-74	• Backfill at well centre not completed appropriately; • Signage not compliant with Guidelines.	November 22, 2023	April 30, 2027*
2033	Cameron L-73	• Backfill at well centre not completed appropriately.	November 24, 2023	April 30, 2027*
2045	Cameron L-40	• Signage not compliant with Guidelines.	November 21, 2023	April 30, 2027*
^ temporary metal fencing to be installed to address safety concerns in 2024 Safety Order by May 15, 2025 * further extensions may be requested pending feedback from engagement, the Mackenzie Valley Land and Water Board and other various stakeholders				

Component 6

WID	Well Name	Deficiencies	Deadline	Extension Request
1736	Cameron L-47	• Bulk tank liner and grounding cable remain on the site and must be removed.	March 31, 2025	April 30, 2027*
1765	Cameron M-73	• Pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.	March 31, 2025	April 30, 2027*
1972	Cameron K-74	• Pilings (or casings) associated with oil and gas infrastructure, detached sections of casing, and other debris remain on the site and must be removed.	March 31, 2025	April 30, 2027*
2026	Cameron 2M-73	• Pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.	March 31, 2025	April 30, 2027*
2073	Cameron 2H-03	• Pilings associated with oil and gas infrastructure and other debris remain on the site and must be removed.	March 31, 2025	April 30, 2027* [^]
• Well site identification and directional signs along access roads and lease entrances remain at the field and must be removed.			March 31, 2025	April 30, 2027*
• Pipeline identification and hazard signs along the pipeline right of ways remain at the field and must be removed.			March 31, 2025	April 30, 2027*
[^] temporary metal fencing to be installed to address safety concerns in 2024 Safety Order by May 15, 2025 * further extensions may be requested pending feedback from engagement, the Mackenzie Valley Land and Water Board and other various stakeholders				

Rationale for Request

The NWT Receiver has not yet addressed the deficiencies noted, as the NWT Receiver was unaware of the majority of the deficiencies until the OROGO inspection conducted between September 17 and 19, 2024.

The NWT Receiver is seeking the request for an extension of the remaining deficiencies:

- 1) In connection with the items identified in the 2024 Safety Order, the NWT Receiver intends to rectify the safety concerns by temporarily erecting metal fencing and securing on each site to prevent access to these areas of concern by May 15, 2025. The NWT Receiver may extend this to Cameron F-75, as the Department of Environment and Climate Change requested that the NWT Receiver confirm that the rat hole and mouse hole have been backfilled; if they were not backfilled they may create an unsafe location and thus the NWT Receiver will secure the same temporary measures. The NWT Receiver intends to permanently rectify the items identified above and requests an extension to complete this work by April 30, 2027 (subject to the commentary below).

- 2) In connection with the other items, as these items have not been identified as unsafe, the NWT Receiver is requesting these be extended to April 30, 2027. The NWT Receiver, with the support of the GNWT, intends to apply for a water licence renewal from the Mackenzie Valley Land and Water Board and to conduct engagement with Indigenous Governments and Indigenous Organizations, and other interested parties, to develop a Closure and Reclamation Plan for the entire site, as required under the water license and land use permit. This plan intends to set out a comprehensive and integrated approach to reclaiming the remaining liabilities at Cameron Hills, and the NWT Receiver is available to include OROGO in this engagement process, as appropriate or as requested. The NWT Receiver has requested the extension to April 30, 2027 to ensure that all outlined approvals and consultations are completed as appropriate. Depending on the outcome of these discussions and engagement, the NWT Receiver may request further extensions to better align with the overall site closure activities, including addressing any unfulfilled components of the 2019 Order (if not fulfilled sooner during other site visits or clean up).

The NWT Receiver is available to discuss this proposal in more detail, if desired. Should you require anything further, please contact the undersigned at (403) 538-7514 or via email at dmacrae@alvarezandmarsal.com.

Yours truly,

**Alvarez & Marsal Canada Inc., in its capacity as Receiver of
Strategic Oil & Gas Ltd. and Strategic Transmission Ltd.'s NWT Properties
and not in its personal or corporate capacity**



Duncan MacRae
Vice President

Cc:
Department of Environment and Climate Change
Department of Environment and Climate Change – South Slave Region