



May 23, 2019

SENT VIA EMAIL AND REGULAR MAIL

James Fulford

Chief Conservation Officer

Office of the Regulator of Oil and Gas Operations

Government of the Northwest Territories

4th Floor, 5201-50 Avenue

Yellowknife NT

X1A 3S9

**RE: CANADIAN NATURAL RESOURCES LIMITED
REQUEST FOR AN OPERATIONS AUTHORIZATION FOR ABANDONMENT
OF NON-COMPLIANT SUSPENDED WELLS (OA-2018-005)**

Canadian Natural Resources Limited (Canadian Natural) is hereby responding to the Office of the Regulator of Oil and Gas Operations (OROGO) request letter dated December 17, 2018 with respect to the application.

- 1) Evidence that CNRL has engaged in discussions with other operators of suspended wells in the vicinity of the 13 suspended wells that are the subject of this application. The evidence must include the identity of the operators and the nature of the discussions in relations to shared access, equipment, and related matters in support of the abandonment program.

Canadian Natural and the other operators that have work in the area (Prairie Provident, Paramount, Obsidian) have met to discuss possible opportunities to work together for efficiency on future suspension and abandonment programs. The discussions in March and May of 2018 included timing of potential future projects, maps and access, and identify any possible synergies by working together. Discussions were put on hold pending OA applications.

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- 2) Confirmation that CNRL has submitted a Benefits Plan applicable to the full scope of the proposed activity (13 wells), or a request for waiver of the requirement, to the Department of Industry, Tourism and Investment, Government of the Northwest Territories.

Canadian Natural submitted a Benefit Waiver request letter to the Minister of Industry, the Honorable Mr. Wally Schumann, Tourism and Investment, Government of the Northwest Territories on April 23, 2019.

- 3) Confirmation that CNRL has applied to the Mackenzie Valley Land and Water Board (MVLWB) for any land use permit or water licence (or amendment of same) necessary to carry out the proposed 13 well abandonments and all associated activities (including winter road building and site access).

Canadian Natural received final consultation feedback from Acho Dene Koe First Nation in Fort Liard May 6, 2019 and submitted a Land Use Permit application May 22, 2019 for the abandonment and reclamation of the 13 wells included in this program.

- 4) A plan for conducting well inspections of the nine non-compliant wells, which must:
 - a. Include an inspections schedule providing for two inspections a year, with one of the two annual inspections taking place during the July-September period, and continuing until the non-compliant wells are abandoned to the satisfaction of the OROGO decision maker.

Canadian Natural plans on completing an inspection in June, 2019, and one mid-September, 2019, dependent on helicopter availability and weather conditions.

- b. Provide information on the qualifications of inspection personnel.
 - Production Technologist - Has 19 years of oil & gas experience; 9 in Operations, 2 in Safety, and 8 in Compliance and Suspended Well Inspections. Also has Class 4 Power Engineering Certification and have taken many technical courses pertinent to dealing with suspended wells.
 - Oilfield Consultant - is a 20 year journeyman pipefitter with extensive wellhead and piping experience.
 - Field Compliance Technologist - Has 12 years oilfield experience including operations, safety, and for the last 2 years has been working in Compliance.

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Canadian Natural

- c. Provide for 30 days notification to OROGO of intended inspections.

Canadian Natural will provide 30 days notification to OROGO of intended inspections.

- d. Confirm that completed and signed inspection forms are to be sent to OROGO within 30 days of the completion of each inspection.

Canadian Natural confirms that it will send OROGO signed inspection forms within 30 days of the completion of each inspection.

If you have any questions, please contact the undersigned at arly.castillo@cnrl.com or at (403) 514-7637.

Yours truly,
CANADIAN NATURAL RESOURCES LIMITED

Arly Castillo
Regulatory Coordinator