



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Mr. Bill Peterson
Senior VP, Development Operations
Canadian Natural Resources Ltd.
Suite 2100, 8500 – 2 ST SW
Calgary AB T2P 4J8

July 23, 2019

Dear Mr. Peterson:

Information Request No. 6
Canadian Natural Resources Ltd. Application for an
Operations Authorization for Well Abandonments (OA-2018-005)

On November 26, 2018, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application from Canadian Natural Resources Ltd. (CNRL) for an Operations Authorization (OA). The OA covers the proposed abandonment of thirteen wells operated by CNRL in the Fort Liard area.

On December 17, 2018, the then Chief Conservation Officer, James Fulford, issued direction to CNRL to provide a number of additional pieces of information related to the well abandonments and the interim inspection of the wells in question, which CNRL provided on May 23, 2019.

OROGO sent Information Request No. 4 to CNRL on June 4, 2019 and has received CNRL's letter of response dated June 25, 2019. OROGO has reviewed the additional information provided by CNRL on June 25, 2019 and requires additional information in order to complete its review of CNRL's OA application, as set out in the attached Information Request No. 6.

Please send your written responses and any associated correspondence to Pauline de Jong, Chief Conservation Officer, OROGO, by email at oro.go@gov.nt.ca or through OROGO's secure file transfer site.

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Please submit your response on or before August 7, 2019. If you are unable to respond within this timeframe or have any questions, please contact me at (867) 767-9097 Ext. 78003 or by email at peter.lennie-misgeld@gov.nt.ca.

Sincerely,



Janpeter Lennie-Misgeld
Senior Advisor, Legislation and Policy

- c. Arly Castillo, Regulatory Coordinator, Canadian Natural Resources Ltd.

Canadian Natural Resources Ltd. (CNRL)

Application for an Operations Authorization (OA-2018-005)

Information Request No. 6

6.1 Safety Plan

Preamble: In response to IR 4.3 issued by the Office of the Regulator of Oil and Gas Operations (OROGO) on June 4, 2019, Canadian Natural Resources Ltd. (CNRL) provided the requested Safety Plan (Plan), required as part of this application under s. 6(c) of the *Oil and Gas Drilling and Production Regulations* (OGDPR). Upon review, it was noted that some of the referenced material in the plan was not included and did not meet all of the requirements of s. 8 of the OGDPR. Specific areas not addressed in the Plan are outlined below:

- CNRL referenced "Appendix 3: Project Specific Information" in the Plan but it was not included;
- In the provided concordance table, CNRL referenced "Section 7" of the Plan to meet the requirements of s. 8(e) of the OGDPR, which requires a summary of the facilities, structures and equipment on site and a summary of the system in place for their inspection, testing and maintenance. "Section 7" identifies types of inspections and their associated forms but does not provide a summary of the facilities, structures and equipment on site; and
- In the provided concordance table, CNRL referenced "Appendix 4" of the Plan to meet the requirements of s. 8(f) of the OGDPR, which requires information on the organizational structure for the proposed work. "Appendix 4" does not contain any of this information.

Request: To ensure compliance with s. 8 of the OGDPR and to ensure the inclusion of all referenced material in the Plan, CNRL is required to provide the following:

- Appendix 3: Project Specific Information;
- Additional information and/or a concordance table that fulfills the requirements of s. 8(e) of the OGDPR; and
- Appendix 4 that fulfills the requirements of s. 8(f) of the OGDPR.

6.2 Environmental Protection Plan

Preamble: In response to IR 4.4 issued by OROGO on June 4, 2019, CNRL provided a concordance table for the Environmental Protection Plan (EPP) that was to identify where the requirements of s. 9 of the OGDPR are fulfilled. Upon review, it was noted that some of the referenced material in the EPP was not included or

did not fulfill the requirements of s. 9 of the OGDPR. Additionally, the EPP does not include well abandonment in the scope of work.

In the provided concordance table, CNRL references "Appendix 6: Waste Management Plan" to meet the requirements of s. 9(h),(i) and (j) of the OGDPR relating to waste management. "Appendix 6" was not included in the EPP.

In the provided concordance table, CNRL references "Attachment A: Corporate Statement on Environmental Protection" to meet the requirements of s. 9(k) of the OGDPR relating to monitoring compliance with the EPP. "Attachment A" was not included in the EPP.

The scope of the EPP, as defined, does not incorporate the proposed abandonment operations for the 13 wells contained in CNRL's application for an Operations Authorization, as it only identifies site maintenance deficiencies.

Request: To ensure compliance with s. 9 of the OGDPR and to ensure that the appropriate scope related to the abandonment operations is provided in the EPP, CNRL is required to provide an updated EPP and concordance table that includes:

- All information that fulfills the requirements of s. 9 of the OGDPR; and
- An updated scope with the associated environmental protection elements that incorporates the abandonment operations proposed for these 13 wells.

6.3 Emergency Management System

Preamble: In response to IR 4.7 issued by OROGO on June 4, 2019, CNRL provided contingency plans to fulfill the requirements of s. 6(j) of the OGDPR. Upon review, it was noted that "Section 6: Corporate Emergency Response Plan" has been redacted to exclude all CNRL emergency contact numbers.

OROGO requires CNRL's emergency contact numbers in the event of an emergency on site. These numbers will not be posted publicly without the express consent of CNRL.

Request: To ensure OROGO has the appropriate emergency contact numbers, CNRL is required to re-submit "Section 6" with no redactions and the inclusion of all relevant emergency response contacts within the company. CNRL should also notify OROGO if CNRL would like to keep this information confidential.

6.4 Decommissioning and Abandonment Activities

Preamble: In response to IR 4.8 issued by OROGO on June 4, 2019, CNRL provided a one page summary of the proposed decommissioning and abandonment activities to fulfill the requirements of s. 6(k) of the OGDPR. Upon review, it was noted that the summary only included surface restoration operations but did not include any

detailed information on the downhole decommissioning and abandonment activities.

Request: To ensure compliance with s.6(k) of the OGDPR, CNRL is required to provide its anticipated approach to the planned decommissioning and abandonment operations for all 13 identified well bores and any other associated oil and gas infrastructure located on site.