



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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

August 20, 2019

Dear Bill Peterson:

Information Request No. 7: 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.

On July 23, 2019, OROGO issued Information request No. 6 which requested additional information from CNRL. OROGO has reviewed the additional information provided by CNRL on August 7, 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. 7.

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.

Please submit your response on or before September 6, 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. 7

7.1 Waste Management

Preamble: In response to IR No. 6 issued by the Office of the Regulator of Oil and Gas Operations (OROGO) on July 23, 2019, Canadian Natural Resources (CNRL) provided a revised Waste Management Plan and Corporate Statement on Environmental Protection. CNRL identified these submissions as fulfilling the requirements of sections 9(h), (i), (j) and (k) of the *Oil and Gas Drilling and Production Regulations* (OGDPR). OROGO has determined that these submissions do not contain enough information or detail to satisfy these sections of the ODGPR.

Request: OROGO requires that CNRL provide the following information to ensure compliance with section 9 (h), (i), (j) and (k) of the OGDPR:

- Identify waste streams and handling procedures associated with use, disposal or release to the environment of well bore fluids, drill wastes and/or flared gas as a by-product of the planned well bore abandonment operations;
- Details on how CNRL plans to monitor compliance with the plan for measuring performance objectives; and
- Updated concordance table identifying where the requested information under section 9 (h), (i), (j) and (k) of the OGDPR is located.

7.2 Decommissioning and Abandonment Activities

Preamble: To fulfill section 6(k) of the OGDPR, CNRL has stated that it will follow OROGO's Suspension and Abandonment Guidelines and Interpretation Notes (Guidelines). While compliance with the Guidelines is required, CNRL has not provided details on proposed operational methodologies or logistics of the planned well bore abandonments required to meet section 6(k) of the OGDPR.

Additionally, CNRL stated in its response to IR No. 4, that all wells would be abandoned in a 12 week period. CNRL has not provided sufficient information on how operations will be conducted to ensure operational safety and protection of the environment.

Request: OROGO requires that CNRL provide the following information to ensure compliance with section 6 of the OGDPR:

- Detailed information on methodologies and logistics for the planned well bore abandonments; and
- Details on how operations will be conducted, in a 12 week period, to ensure operational safety and protection of the environment. This should include, but not be limited to:
 - number of service rigs;
 - detailed logistics;and
 - contingencies should there be a delay in one of the well abandonment programs.