

Bill Peterson  
Senior VP, Development Operations  
Canadian Natural Resources Ltd.  
Suite 2100, 8800 – 2 ST SW  
CALGARY AB T2P 4J8

September 20, 2019

Dear Bill Peterson:

**Information Request No. 8:  
Canadian Natural Resources Ltd. Application  
Proof of Financial Responsibility (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 November 29, 2018, the then Chief Conservation Officer, James Fulford, issued Information Request (IR) No. 2, requesting additional information from CNRL with respect to Proof of Financial Responsibility (PFR). OROGO reviewed the additional information provided by CNRL on December 12, 2018.

On June 4, 2019, OROGO issued IR No. 5 which requested that CNRL provide additional information on PFR and the additional information was received from CNRL on July 8, 2019.

OROGO has reviewed the information provided by CNRL and requires additional information to complete its review of CNRL's OA application, as set out in the attached Information Request No. 8.

Please send your written responses and any associated correspondence to me by email at [orogo@gov.nt.ca](mailto:orogo@gov.nt.ca) or through OROGO's secure file transfer site.

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Please submit your response on or before 4:00 p.m. on October 2, 2019. If you are unable to respond within this timeframe or have any questions, please contact me at (867)767-9097 or by email at [pauline\\_dejong@gov.nt.ca](mailto:pauline_dejong@gov.nt.ca).

Sincerely,



Janpeter Lennie-Misgeld  
Senior Advisor, Legislation and Policy

**Attachment**

- 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. 8**

**8.1 Preamble**

In Information Request No. 5, CNRL was asked to provide the following:

“An assessment of potential clean-up costs that takes into account remote northern operating conditions and assesses probability based all 13 wells under the OA.”

CNRL noted in its response that, while unlikely, a spill could occur during abandonment operations. CNRL identified that the maximum spill volume would be less than 60 m<sup>3</sup> and that “potential clean-up cost would be minimal”. However, CNRL provided no specific cost estimates for clean-up costs associated with a spill as described.

Section 64(3) of OGOA requires that the Regulator have funds available to be paid out in the event of a claim for actual loss or damage, or costs and expenses incurred by a third party to clean up a spill or debris, attributable to an authorized activity.

**Request**

Please provide an estimate for the cost to a third party of cleaning up a spill as identified in CNRL’s response to Information Request No. 5. The cost estimate should include costs for establishment of camp facilities, access roads and other infrastructure that would be required to complete clean-up operations, as well as the clean-up itself and disposal of any contaminated materials.