



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

P.O. Box 1320, Yellowknife, NT X1A 2L9

Tel: 867-767-9097 • Fax: 867-920-0798 • Web: [www.oro.go.gov.nt.ca](http://www.oro.go.gov.nt.ca)

Courier Address: 4th floor, 5201 – 50th Avenue, Yellowknife, NT X1A 3S9

Bill Peterson  
Senior VP, Development Operations  
Canadian Natural Resources Ltd.  
SUITE 2100, 8500 – 2<sup>ND</sup> ST SW  
CALGARY AB T2P 4J8

October 8, 2020

Dear Bill Peterson:

**Decision: Request for Extension - Well Abandonment and Reclamation Program Fort Liard Area (OA-2018-005-CNRL)**

On October 5, 2020, the Office of the Regulator of Oil and Gas Operations (OROGO) received a letter from Canadian Natural Resources Ltd. (CNRL) requesting that CNRL's approved abandonment and reclamation program (OA-2018-005-CNRL), originally planned for the 2021 winter season, be deferred until 2022 as a result of the COVID-19 pandemic and associated public health requirements.

Nine of the twelve wells covered under OA-2108-005-CNRL were to be abandoned before August 2019, in accordance with the *Well Suspension and Abandonment Guidelines and Interpretation Notes* (Guidelines), as they are not in compliance with the suspended well requirements of the Guidelines. CNRL has been aware of this requirement since it was notified on August 31, 2017 of the status of its suspended wells in relation to compliance with the Guidelines. On August 21, 2019, OROGO directed CNRL to abandon the nine non-compliant suspended wells by April 1, 2021, as it had not voluntarily taken steps to come into compliance with the Guidelines by that time.

OROGO would like to remind CNRL that the terms of its Operations Authorization require that CNRL conduct all work and activities in accordance with the requirements of the *Oil and Gas Operations Act* and the *Oil and Gas Drilling and Production Regulations*, as well as with the Guidelines. Therefore, OROGO expects that CNRL will make every effort to complete the abandonment of the nine non-compliant suspended wells by April 1, 2021, in order to bring itself into compliance with the Guidelines at the earliest possible time.

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CNRL's October 5, 2020 letter indicates that CNRL has put in place "comprehensive procedures" to address the risks associated with COVID-19 during its activities. However, it does not describe in any detail how CNRL proposes to manage the activities authorized under OA-2018-005-CNRL in order to comply with relevant Government of the Northwest Territories (GNWT) Public Health Orders and guidance. It also does not indicate that CNRL has submitted any plans to the GNWT's Office of the Chief Public Health Officer (CPHO) for consideration.

For reference, the CPHO has issued a Public Health Order and other guidance specific to the mineral and petroleum resources industries:

- Public Health Order – COVID-19 Relaxing Phase 2, released on June 12, 2020, includes subsection 1(h), which provides exceptions for transient workers employed at a work camp where work is being done in relation to the mineral and petroleum resources industry. Details can be found here:

<https://www.gov.nt.ca/covid-19/sites/covid/files/resources/public-health-order-covid-19-directed-mineral-petroleum-industry.pdf>

- Guidelines for social distancing protocols for both NWT and non-NWT resident workers at remote work camps to help operators safely conduct work at remote sites. Details can be found here:

<https://www.gov.nt.ca/covid-19/sites/covid/files/resources/public-health-order-covid-19-directed-mineral-petroleum-industry.pdf>

<https://www.gov.nt.ca/covid-19/en/services/essential-workers/social-distancing-protocols-remote-work-camps>

Based on the above information, CNRL can conduct its proposed program if it complies with the order of the CPHO or, alternatively, CNRL can apply to receive an exemption from the CPHO for its proposed program. Based on these options and the work program as approved under OA-2018-005-CNRL, there appears to be no impediment to CNRL completing its proposed work program in the first quarter of 2021.

OROGO requests that CNRL:

- Submit a plan for conducting the required well abandonments in accordance with the Public Health Order and guidance referenced above to the CPHO for approval no later than November 16, 2020;
- Provide copies of the information submitted to the CPHO in support of conducting the well abandonments to OROGO at [orogo@gov.nt.ca](mailto:orogo@gov.nt.ca); and
- Inform OROGO of the CPHO's decision immediately upon receipt.

If you have any questions, please contact OROGO at (867) 767-9097 or by email at [orogo@gov.nt.ca](mailto:orogo@gov.nt.ca).

Sincerely,



Pauline de Jong  
Executive Director

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

Ryan Munro, Manager, Abandonment Engineering, Canadian Natural Resources Ltd.

Scott Reed, Canadian Natural Resources Ltd.

