

Peter Lennie-Misgeld

From: Peter Lennie-Misgeld
Sent: September 18, 2020 2:25 PM
To: Craig Langford
Cc: 'Craig.Dansereau@obsidianenergy.com'; Steve Sterling; DST_JUS_OROGO
Subject: OROGO Information Request No. 11 - Obsidian Energy Ltd. (OA-2019-001)
Attachments: OROGO Information Request No. 11 - Additional Technical Information.pdf

Craig Langford
Environmental Coordinator
Obsidian Energy Ltd.
Suite 200, Penn West Plaza
207 – 9 AVE SW
CALGARY AB T2P 1K3

September 18, 2020

Dear Craig Dansereau:

**Information Request No. 11: Obsidian Energy Ltd.
Proof of Financial Responsibility Additional Information (OA-2019-001-OBS)**

On September 18, 2019, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application from Obsidian Energy Ltd. (Obsidian) for an Operations Authorization (OA). The OA covers the proposed abandonment of two wells operated by Obsidian in the Fort Liard area of the Northwest Territories.

On November 26, 2019 OROGO issued Information Request No. 3 which requested additional technical information from Obsidian. Obsidian submitted a response to Information Request No. 3 on January 31, 2020. OROGO then requested additional technical information from Obsidian issued under Information Request No.4. Obsidian provided a response to Information Request No. 4 on March 6, 2020. OROGO again requested additional technical information under Information Requests No. 6 and 8 dated April 14, 2020 and July 10, 2020 respectively. OROGO has reviewed the information provided by Obsidian and still requires additional information in order to complete its review of Obsidian's OA application, as set out in the attached Information Request No. 11.

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

Please submit your response on or before 4:00 p.m. on October 9, 2020. If you are unable to respond within this timeframe or have any questions, please contact OROGO at (867) 765-8160 or by email at orogo@gov.nt.ca.

Sincerely,

Janpeter Lennie-Misgeld
Senior Advisor, Legislation and Policy

Mr. Janpeter Lennie-Misgeld
Senior Advisor, Legislation and Policy | Conseiller principal, Législation et politiques
Office of the Regulator of Oil and Gas Operations | Bureau de l'organisme de réglementation des opérations
pétrolières et gazières
Government of the Northwest Territories | Gouvernement des Territoires du Nord-Ouest
PO Box 1320
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Tel | Tél: 867-767-9097 ext 78003
Fax | Téléc: 867-920-0798
Web | Site web : www.orogo.gov.nt.ca
NWT-NU Spill Line: 867-920-8130
OROGO Incident Reporting Line | Pour signaler un incident: 867-445-8551

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Mr. Janpeter Lennie-Misgeld

Senior Advisor, Legislation and Policy | Conseiller principal, Législation et politiques
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Information Request No. 11
Obsidian Energy OA-2019-001-OBS

11.1 Environmental Protection and Contingency Plans:

Preamble:

For Information Request (IR) No. 9 issued by OROGO on August 20, 2020, Obsidian was requested to provide concordance tables that clearly identify where information required by section 6(j) and 9 of the *Oil and Gas Drilling and Production Regulations* (OGDPR) are located.

To ensure submission of the required information under the OGDPR and to reduce the need to duplicate documents through multiple regulatory submissions, OROGO requires concordance tables to not only list the documents/information sources that contain the information but also cite the full document name, date of submission, revision number, section title and page number.

Section 3 of the Environmental Protection Plan (EPP) – Liard Area – C-31 & K-32 June 23, 2020, states the EPP is not a stand-alone document and references the following related documents that OROGO was not able to locate during our review:

- Environmental Policy;
- Environmental Intranet Page;
- Vendor Management;
- Site Supervisor Competency Documents; and
- Environmental Department - Information Bulletins.

As such, OROGO is unable to determine if these documents contain the required information to comply with the aforementioned sections of the OGDPR.

Additionally, as requested in IR No. 9, Obsidian should have provided an updated EPP and site-specific Emergency Response Plan (ERP) that meets the requirements of Section 9 and 6(j) of the OGDPR. Aside from the updated and incomplete concordance table in the EPP, no additional updated documents were submitted.

Request:

Obsidian is required to submit the following:

- Please provide a concordance table that identifies where the legislated requirements of section 6(j) of the OGDPR are met;
- Please provide a concordance table that identifies where the legislated requirements of section 9 of the OGDPR are met;
- Please provide an Updated EPP; and

- Please provide an Updated site-specific ERP.

All documents/information sources, or relevant section(s) thereof, referenced in the EPP, ERP and the updated concordance tables should include the **full document name, date of submission, revision number, section title, and page number**.

Should the updated concordance table reference a document/information source, or relevant section(s) thereof, that have not been previously submitted to OROGO as part of this application process, that document/information source, or relevant section(s) thereof, must be included with the response to this information request.