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December 13, 2022

Department of Justice
Office of the Regulator of Oil and Gas Operations
Government of the Northwest Territories
4th Floor Northwest Tower
5201 – 50th Ave
Yellowknife NT X1A 3S9

Attention: Pauline de Jong, Regulator

Via Email Only: OROGO@gov.nt.ca

OA-2019-002-MGM

MGM Energy (a wholly owned subsidiary of Paramount Resources Ltd.) is the operator of seven shut-in gas wells in the Central Mackenzie Valley, specifically:

1. MGM Nogha C-49 WID1934
2. MGM West Nogha K-14 WID2006
3. MGM Apache Nogha B-23WID1998
4. Apache Paramount Lac Maunoir C-34 WID1995
5. Apache Paramount Lac Maunoir E-35 WID2021
6. MGM et al Nogha M-17 WID1970
7. MGM Shell East Mackay I-78WID2078

All wells were inspected in 2022 and are safe and secured. MGM will continue to conduct suspended well inspections as per OROGO's direction.

Abandonment operations on these seven wells are planned to be performed in conjunction with Suncor Energy (Suncor) by March 31, 2024. Coordinating operations for all wells will allow safer and more efficient operations and will minimize road construction, equipment mobilization and associated environmental impact. To achieve completion of the winter abandonments MGM Energy (MGM) engaged with the local communities and Suncor to stage equipment in February 2023. Engagement on the abandonment project began in 2019 and over the course of the last three plus years has included numerous engagements including, phone calls, electronic distributions, virtual meetings and face to face to meetings.

Throughout the engagement activities MGM has been working with the local communities and continues to engage with the K'ahsho Got'ine Land Corporation, Behdzi Ahda' First Nation / Ayoni Keh Land Corporation, Fort Good Hope Dene Band / Yamoga Land Corporation, Fort Good Hope Metis Nation Local #54 Land Corporation and others to develop a resource plan for staging equipment for the abandonments aligned with our Benefits Plan.

Despite best efforts MGM has not finalized a resource plan and has concerns that this may impact the safety and timing of the well abandonments. Therefore, MGM requests an extension of the well abandonment date until March 31, 2025, to allow sufficient time to develop a resource plan that ensures the safety of this remote work and to maximize the benefits to the local community.

MGM proposes the following schedule:

- 2024-02 Staging winter road construction equipment
- 2024-11 Commence winter road construction
- 2025-01 Well abandonment operations

Should you require additional information, please contact me.

Respectfully,

MGM Energy

A handwritten signature in black ink, appearing to read 'John Hawkins', with a long horizontal flourish extending to the right.

John Hawkins, P.Eng.

Director Asset Management

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