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March 18, 2025

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

**Attention: Pauline de Jong, Regulator**

**Via Email Only: [OROGO@gov.nt.ca](mailto:OROGO@gov.nt.ca)**

**Information #12 Response for OA-2019-002-MGM**

MGM Energy (MGM) planned to abandon the following 6 wells in accordance with the subject Operations Authorization and in accordance with the Office of the Regulator of Oil and Gas Operations (OROGO) Well Suspension and Abandonment Guidelines and Interpretation Notes Section 6E– Surface Abandonment Requirements in the winter of 2025.

Well Name	WID
1. MGM Nogha C-49	1934
2. MGM West Nogha K-14	2006
3. MGM Apache Nogha B-23	1998
4. MGM et al Nogha M-17	1970
5. Apache Paramount Lac Manoir C-34	1995
6. Apache Paramount Lac Manoir E-35	2021

Responses to IR#12 are listed below:

**12.1 Potential Impacts on Safety and Environment**

The potential safety impacts associated with completing the abandonment operations by March 31, 2025.

- The potential environmental impacts associated with completing the abandonment operations by March 31, 2025

The potential safety hazards to complete the Nogha abandonments this winter are potentially caused by a perceived haste resulting in vehicle rollover, loss of traction on steep hills, stream crossings breakthrough, etc. All of these have the potential to cause injury, spills and/or damage to equipment. Attempting to extend the operation season beyond what is prudent will likely cause environmental damage in addition to safety hazards.

This includes rutting on winter roads, damage to riparian areas, subsequent silting during spring runoff and increased potential for spills.

As the winter access to Manoir was progressing it became clear that it was impossible to complete the access to the Nogha wells and maintain the Manoir access due to poor performance of the local contractors. MGM attempted to alleviate the performance delays by flying in a full-time mechanic for the duration of the program, entered agreement with the Government of Northwest Territories for road construction and maintenance and accessing additional equipment from the region. Working with the local community is a commitment MGM has with the Government of the Northwest Territories as per our Benefits Agreement and an expectation of the local community.

### **12.2 Status of Service Rigs**

Please provide an explanation of MGM's decision to proceed with only one service rig, including:

- When this decision was made.
- How MGM intended to complete the well abandonment operations as planned and approved with only one service rig.

Please provide the status and location of the remaining service rig required to complete the abandonment operations by March 31, 2025, and describe any impact on MGM's ability to complete operations as planned.

The abandonment plan was to move the service rig from Norman Wells to start on the Manoir wells when the ice road met load specifications which was approximately March 7, 2025, a second service rig from Alberta would be brought to start the abandonment of the Nogha wells. Once the Manoir wells were abandoned the service rig would move to the Nogha field to assist with the abandonment program. However, as noted above the performance of the local resources and supplemental resources brought in from Norman Wells and Fort Good Hope was only capable of safely constructing and maintaining the road to Nogha this winter. MGM's preference would have been to complete all wells in one winter season as it will add costs for mobilization and demobilization of equipment and resources. The second service rig is currently working on a well near Fort Nelson, BC.

MGM is in the process of staging fuel, camp and equipment at Colville in preparation for the Nogha well abandonments in the winter of 2026.

Respectfully,

**MGM Energy**



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