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December 1, 2020

Office of the Regulator of Oil and Gas Operations  
Government of the Northwest Territories  
P.O. Box 1320  
Yellowknife, NT  
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Canada

**Attn: Pauline de Jong**  
**Regulator**

**Re: Information Request No. 1: Paramount Resources Ltd. Application for an Operations Authorization for the Abandonment of Four Wells (OA-2020-001-PAR)**

Please find Paramount Resources Ltd. response to the IR#1, along with revised Appendices 5 and 6 as detailed below.

**1.1 Management Systems - Paramount Operational Excellence Management System (POEMS)**

Attached please find a PDF copy of the Paramount Operational Excellence Management System (POEMS).

**1.2 Safety Plan – Flaring**

Attached please find a revised Appendix 5, including the Project Risk Register, updated to address flaring equipment as required by Section 8(e) of the OGDPR.

In accordance with the instructions in the DRAFT APPLICATIONS FOR WELL SUSPENSION OR ABANDONMENT - GUIDELINES AND INTERPRETATION NOTES, the entire Appendix 5 is being resubmitted. It is titled Appendix 5 – Version 2 and replaces Appendix 5 of the original submission.

It contains the following files:

- COR-HSE-PLN-002 Safety Plan NWT 2020 (modified to address IR 1.3)
- NWT Safety Plan Risk Register (modified as above)
- Pandemic -Temporary Worksite Safety Plan 20200916 -V4 - FINAL October 9, 2020

Two versions of the Appendix 5 are supplied – REDACTED and UNREDACTED

**1.3 Safety Plan – Shallow Bridge Plug**

As above, the Safety Plan has been modified to address the issues associated with a shallow bridge plug in the N-65 well.

Further details will be included in the program of operations for the N-65 well, supplied as part of

the Authorization to Alter the Condition of a Well. Note this has not been submitted to OROGO as of writing.

#### 1.4 Environmental Protection Plan – Inspection, Testing and Maintenance

Attached please find a revised Appendix 6 Environmental Protection Plan Version 2, updated to address inspection, testing and maintenance of critical systems as required by Section 9(e) of the OGDPR. Included in Appendix 6 is the CAODC Service Rig Inspection Checklist referenced in the document.

#### 1.5 Environmental Protection Plan – Selection, Evaluation and Use of Chemicals

The Environmental Protection Plan (EPP) interpreted process chemicals as relating to those used in the production process (which is not a subject of this application). The revised EPP addresses the chemicals to be used (or possibly used) in the abandonment process. Specifically, Paramount will use cement as part of the plugging operations. In addition, although not currently planned or programmed, it may be necessary to use hydrochloric acid to facilitate cement squeezes. The acid and neutralizing agent are addressed in section 3.2 of the revised EPP. Safety Data Sheets (SDS) for these products are included in the revised Appendix 6.

#### 1.6 Environmental Protection Plan – Treatment, Handling and Disposal of Waste Material

Paramount is unclear what additional information is required to evaluate the procedures for “Treatment, Handling and Disposal of Waste Material” to fulfil the requirements of OGDPR (9) (h). The supplied Site-Specific Environmental Protection Plan includes Table 3 which addresses 27 categories of potential waste along with the waste classification and UN# (where applicable). This table was extracted from the “Environmental Protection Program, Fort Liard, NWT - Part 3 – Corporate Procedures Waste Management Plan”.

Materials unique to the planned operations (cement debris, spent acid, etc.) are addressed in the body of the document.

Materials that are not applicable such as handling of process chemicals used in gas production plants has been omitted to ensure that the material that is relevant to the scope of work can be easily obtained by onsite personnel without it being obscured by excess irrelevant details.

Please contact the undersigned at (403) 817-5074 or [john.hawkins@paramountres.com](mailto:john.hawkins@paramountres.com) if you have any questions regarding this project and application.

Respectively,  
**PARAMOUNT RESOURCES LTD.**



John Hawkins, P. ENG.  
Director Asset Management  
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