



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Brad Likuski
Vice President, Operations
Prairie Provident Resources Canada Ltd.
1110, 640 – 5th AVENUE SW
CALGARY AB T2P 3G4

July 30, 2021

Dear Brad Likuski:

**Information Request No. 3:
Prairie Provident Resources Canada Ltd. Management Systems and
Program Information - Additional Information Required (OA-2021-001-PPR)**

On June 28, 2021, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application for an Operations Authorization (OA) for the abandonment of the Mount Coty 2K-02 (WID 1993) and S. Pointed Mountain L-68 (WID 1207) wells near Fort Liard from Prairie Provident Resources Canada Ltd (PPR).

OROGO has reviewed the information provided by PPR and requires additional information in order to complete its review of PPR's OA application, as set out in the attached Information Request No. 3.

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

Please submit your response on or before 4:00 p.m. on August 18, 2021. If you are unable to respond within this timeframe or have any questions, please contact OROGO at (867) 765-8160 or by email at oro.go@gov.nt.ca.

Sincerely,

Pauline de Jong
Regulator

Prairie Provident Resources Canada Ltd. OA-2021-001-PPR
Application for an Operations Authorization
Mount Coty 2K-02 and S. Pointed Mountain L-68 Wells
Information Request No. 3

3.1 Management System

Preamble:

The Operations Authorization (OA) application received from Prairie Provident Resources Ltd. (PPR) on June 28, 2021 provides various operational plans and policies. However, PPR has not identified a system of integration for the management of financial and human resources to ensure compliance with section 5 of the *Oil and Gas Drilling and Production Regulations* (OGDPR).

Section 5 of the OGDPR requires that PPR identifies the details of an effective management system which integrates operations and technical systems with the management of financial and human resources to ensure compliance with the *Oil and Gas Operations Act* (OGOA) and the OGDPR.

Request:

Please provide a description of PPR's management system and a concordance table that demonstrates how this system meets the following requirements under section 5 of the OGDPR:

- The processes for setting goals for the improvement of safety, environmental protection and waste prevention;
- The processes for identifying hazards and for evaluating and managing the associated risks;
- The processes for ensuring that personnel are trained and competent to perform their duties;
- The processes for ensuring and maintaining the integrity of all facilities, structures, installations, support craft and equipment necessary to ensure safety, environmental protection and waste prevention;

- The processes for the internal reporting and analysis of hazards, minor injuries, incidents and near-misses and for taking corrective actions to prevent their recurrence;
- The documents describing all management system processes and the processes for making personnel aware of their roles and responsibilities with respect to them;
- The processes for ensuring that all documents associated with the system are current, valid and have been approved by the appropriate level of authority;
- The processes for conducting periodic reviews or audits of the system and for taking corrective actions if reviews or audits identify areas of non-conformance with the system and opportunities for improvement;
- The arrangements for coordinating the management and operations of the proposed work or activity among the owner of the installation, the contractors, the operator and others, as applicable; and
- The name and position of the person accountable for the establishment and maintenance of the system and of the person responsible for implementing it.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 5 of the OGDPR.

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.

3.2 Flaring and Venting

Preamble:

PPR's OA application, received June 28, 2021, does not provide information on any potential flaring or venting operations during the well operations.

Section 67 of the OGDPR indicates that, outside of an emergency situation, all flaring and venting of gas must be specifically authorized by the Regulator.

Section 6(e) of the OGDPR requires that PPR describe the venting of gas, including the rationale and the estimated rate, quantity and period of the flaring or venting.

Request:

Please provide an estimated volume of gas for both proposed well operations, in compliance with section 6(e) of the OGDPR, in the event flaring or venting is required.

3.3 Safety Plan**Preamble:**

The Safety Plan submitted as part of PPR's OA application, received June 28, 2021, does not fully meet the requirements if the *OROGO Safety Plan Guidelines and Interpretation Notes* (Safety Plan Guidelines) or section 8 of the OGDPR.

The Safety Plan and associated documents do not address the following requirements:

- A summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in the OGDPR with regard to safety will be fulfilled;
- A detailed description of the organizational structure and command structure that clearly explains their relationship to each other. Currently, the Safety Plan identifies only one person to provide oversight for the entire identified operational team; and
- A description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

The Safety Plan and associated documents also do not list the Workers Safety and Compensation Commission (WSCC) as a regulatory authority for safety or include its reporting requirements.

Request:

Please provide an updated Safety Plan and a concordance table that demonstrates how this system meets the requirements under section 8 of the OGDPR, including:

- A summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in the OGDPR with regard to safety will be fulfilled;

- A description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains their relationship to each other, and the contact information and position of the person accountable for the safety plan and of the person responsible for implementing it;
- A description of the process for monitoring compliance with the plan and for measuring performance in relation to its objectives; and
- Appropriate references to the role and requirements of the WSCC.

Please also provide a concordance table that demonstrates how Management Systems are related to the requirements of section 8 of the OGDPR.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 8 of the OGDPR.

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.

3.4 Contingency Plan

Preamble:

The Contingency Plan submitted as part of PPR's OA application, received June 28, 2021, does not fully meet the requirements of the *Contingency Plan Guidelines and Interpretation Notes* (Contingency Plan Guidelines).

The Core and Fort Liard Well Abandonment Program Emergency Response Plans do not address the following:

- How risk is evaluated and assessed nor how risk mitigation measures are developed and mitigated as required by section 5 B of the Contingency Plan Guidelines;
- Resources and equipment available to respond to an emergency situation, with the exception of suggested list of equipment, as required by section 5 B of the Contingency Plan Guidelines; and

- A comprehensive list of the regulatory authorities in the Northwest Territories that are applicable to these operations, including but not limited to the GNWT Departments of Lands and Environment and Natural Resources and the Workers Safety and Compensation Commission, as required by section 5 B of the Contingency Plan Guidelines.

Request:

Please provide an updated Fort Liard Well Abandonment Emergency Response Plan that is compliant with Contingency Plan Guidelines and includes a concordance table to identify where the updated plan meets the requirements of the Contingency Plan Guidelines.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of the Contingency Plan Guidelines.

Should the 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.

3.5 Environmental Protection Plan

Preamble:

The Environmental Protection Plan (EPP) submitted as part of PPR's OA application received June 28, 2021 does not fully meet the requirements of section 9 of the OGDPR.

The EPP does not address the following requirements:

- A summary of and reference to the management system that identifies how the identified plans will be applied to the proposed work and how they meet the requirements of the OGDPR;
- A comprehensive list of all structures, equipment and systems critical to environmental protection a protection or demonstrate the system in place for their inspection and maintenance;

- A detailed description of the organizational structure and command structure that clearly explains their relationship to each other. Currently, the Environmental Protection Plan identifies only one person to provide oversight for the entire identified operational team; and
- Detail on how the identified team will ensure compliance and monitoring is achieved and tracked.

Request:

Please provide an updated EPP and a concordance table that demonstrates how this system meets the requirements under section 9 of the OGDPR, including:

- A summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in these regulations with regard to environmental protection will be fulfilled;
- A list of all structures, facilities, equipment and systems critical to environmental protection and a summary of the system in place for their inspection, testing and maintenance;
- A description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains their relationship to each other, and the contact information and position of the person accountable for the environmental protection plan and the person responsible for implementing it; and
- A description of the system for monitoring compliance with the discharge limits and inspection frequency, including the sampling and analytical program to determine if those discharges are within the specified limits.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 9 of the OGDPR.

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.