



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

October 6, 2021

Dear Brad Likuski:

**Information Request No. 5:
Prairie Provident Resources Canada Ltd. Management Systems and
Program Information - Additional Information Required (OA-2021-001-PPR)**

On September 20, 2021, the Office of the Regulator of Oil and Gas Operations (OROGO) received the response to Information Request No. 3 required under the 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. 5.

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 October 25, 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. (PPR) OA-2021-001-PPR
Application for an Operations Authorization
Mount Coty 2K-02 and S. Pointed Mountain L-68 Wells
Information Request No. 5

5.1 Contingency Plan

Preamble:

The Emergency Response Plans submitted as part of PPR's OA application on June 28, 2021 were compared to PPR's Contingency Plan concordance table provided as part of the response to IR No. 3 received on September 20, 2021.

These plans and associated documents do not fully meet the requirements of the *Contingency Plan Guidelines and Interpretation Notes* (Contingency Plan Guidelines).

The Northwest Territories Emergency Response Plan, Alberta Core Corporate Emergency Response Plan do not address the following:

- 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 the 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.

5.2 Environmental Protection Plan

Preamble:

The Environmental Protection Plan (EPP) submitted as part of PPR's OA application received June 28, 2021 was compared to PPR's EPP concordance table provided as part of the response to IR No. 3 received September 20, 2021.

This plans and associated documents continue to not fully meet the requirements of section 9 of the OGDPR.

The EPP and associated documents do not address the following requirements:

- 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; 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 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; 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.