



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Chris Moger
Surface Landman
Suncor Energy Inc.
P.O. Box 2844
150 – 6th AVENUE S.W.
CALGARY AB T2P 3E3

June 28, 2021

Dear Chris Moger:

Information Request No. 2: Suncor Energy Inc.
Technical - Additional Information Required (OA-2021-002-SUN)

On June 1, 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 Tathlina N-18 well (OA-2021-002-SUN) in the South Slave Region from Suncor Energy Inc. (Suncor).

OROGO has reviewed the information provided by Suncor in its OA application and requires additional information in order to complete its review of Suncor's OA application, as set out in the attached Information Request No. 2.

Please send your written responses and any associated correspondence to OROGO 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 July 27, 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,

Janpeter Lennie-Misgeld
Senior Advisor, Legislation and Policy

c. Margot Ferguson, Envirosearch Ltd.

Suncor Energy Inc.
Application for an Operations Authorization (OA-2021-002-SUN)
Information Request No. 2

2.1 Management Plans

Preamble:

Section 3.0 of the Abandonment Program – Safety Management Plan submitted by Suncor Energy Inc. (Suncor) identifies that there are several management systems in place that integrate Safety, Emergency and Environmental management. Suncor states that operations are managed in accordance with its Operational Excellence Management System (OEMS), DCLL Logistics Manual and various operational plans. While these management systems, manuals and plans have been identified, with the exception of OEMS Element 20, they have not been provided as part of Suncor's application and therefore OROGO is unable to determine if Suncor's application meets the requirements of section 5 of the *Oil and Gas Drilling and Production Regulations* (OGDPR).

Request:

Please provide a description and copy of all referenced management system documentation and a concordance table that identifies how these documents meet the following requirements under section 5(2) of the OGDPR:

- a) the policies on which the system is based;
- b) the processes for setting goals for the improvement of safety, environmental protection and waste prevention;
- c) the processes for identifying hazards and for evaluating and managing the associated risks;
- d) the processes for ensuring that personnel are trained and competent to perform their duties;
- e) 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;
- f) 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;

- g) the documents describing all management system processes and the processes for making personnel aware of their roles and responsibilities with respect to them;
- h) the processes for ensuring that all documents associated with the system are current, valid and have been approved by the appropriate level of authority;
- i) 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;
- j) 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
- k) the name and position of the person accountable for the establishment and maintenance of the system and of the person responsible for implementing it

All documents referenced in the concordance table should include the full document name, section and page number. If the concordance table references a document, or section of a document, that has not been previously submitted to OROGO as part of this application process, that document must be included with the response to this information request.

2.2 Flaring and Venting

Preamble:

Suncor's Abandonment Program – Operations Planning document (Section III-4, Downhole Abandonment) identifies that flaring or venting of gas is not anticipated during well abandonment operations due to water zones being present.

Section 6(e) of the OGDPR states that the application must include information on any proposed flaring or venting of gas, including the rationale and the estimated rate, quantity and period of the flaring or venting.

Although flaring or venting of gas is not anticipated, the maximum volume of potential gas to be flared or vented should be identified in the event that gas needs to be managed during abandonment operations.

Request:

Please identify an estimated maximum volume of gas that may require flaring or venting for each well abandonment operation.

2.3 Contingency Plan

Preamble:

Suncor's Drilling, Completions and Logistics Emergency Response Plan (ERP) does not meet the requirements of section 6(j) of the OGDPR or OROGO's *Contingency Plan Guidelines and Interpretation Notes*.

For example, with the exception of Section 2.2 – Government Support Contacts, which identifies Northwest Territories Regulatory contacts, all references and operational response guidance refer to Alberta regulatory and emergency response authorities and not those relevant to the Northwest Territories. Additional site-specific emergency response information was attached as an appendix to the Suncor's Abandonment Program – Safety Management Plan but is not referenced in or integrated into the ERP.

Section 6(j) of the *Oil and Gas Drilling and Production Regulations* (OGDPR) states that the application for authorization must be accompanied by contingency plans, including emergency response procedures, to mitigate the effects of any reasonably foreseeable event that might compromise safety or environmental protection, which must provide for coordination measures with any relevant municipal, provincial, territorial or federal emergency response plan.

Request:

Please provide an integrated, **site-specific** Emergency Response Plan, supporting documentation and concordance table that references where, in any of the documents that have been submitted as part of this application process, the information to meet the requirements of Section 6 (j) of the OGDPR can be found.

All documents referenced in the concordance table should include the full document name, section and page number. If the concordance table references a document, or section of a document, that has not been previously submitted as part of this application process, that document must be included with the response to this information request.

OROGO's *Contingency Plan Guidelines and Interpretation Notes* outline the purpose, scope, content and format required to meet the requirements of the OGDPR and can be found on OROGO's website at www.oroqo.gov.nt.ca.

2.4 Safety Plan

Preamble:

Suncor's Safety Management Plan does not meet the requirements of section 8 of the OGDPR or OROGO's *Safety Plan Guidelines and Interpretation Notes*.

Section 8 of the OGDPR states that the Safety Plan must set out the procedures, practices, resources, sequences of key safety-related activities and monitoring necessary to safety of the proposed work or activity.

Request:

Please provide an updated Safety Plan, supporting documentation and concordance table that references where, in any of the documents submitted as part of this application process, the information to meet the requirements of Section 8 of the OGDPR can be found. Specifically, the concordance table must include references for:

- a) 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 safety will be fulfilled;
- b) a summary of the studies undertaken to identify hazards and to evaluate safety risks related to the proposed work or activity;
- c) a description of the hazards that were identified and the results of the risk evaluation;
- d) a summary of the measures to avoid prevent, reduce and manage safety risks;
- e) a list of all structures, facilities, equipment and systems critical to safety and a summary of the system in place for their inspection, testing and maintenance;
- f) a description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains:
 - i. their relationship to each other, and
 - ii. the contact information and position of the person accountable for the safety plan and of the person responsible for implementing it;
- g) description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

All documents referenced in the concordance table should include the full document name, section and page number. If the updated concordance table references a

document, or section of a document, that has not been previously submitted to OROGO as part of this application process, that document must be included with the response to this information request.

OROGO's *Safety Plan Guidelines and Interpretation Notes* outline the purpose, scope, content and format required to meet the requirements of the OGDPR and can be found on OROGO's website at www.oroغو.gov.nt.ca.

2.5 Environmental Protection Plan

Preamble:

Suncor's Environmental Protection Plan does not meet the requirements of section 9 of the OGDPR or OROGO's *Environmental Protection Plan Guidelines and Interpretation Notes*.

Section 9 of the OGDPR states that the Environmental Protection Plan must set out the procedures, practices, resources and monitoring necessary to manage hazards to and protect the environment from the proposed work or activity and lists specific items that must be included in the submission.

Request:

Please provide an updated Environmental Protection Plan, supporting documentation and concordance table that references where, in any of the documents submitted as part of this application process, the information to meet the requirements of Section 9 of the OGDPR can be found. Specifically, the concordance table must include references for:

- a) 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;
- b) a summary of the studies undertaken to identify environmental hazards and to evaluate environmental risks relating to the proposed work or activity;
- c) a description of the hazards that were identified and the results of the risk evaluation;
- d) a summary of the measures to avoid, prevent, reduce and manage environmental risks;
- e) 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;

- f) a description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains:
 - i. their relationship to each other, and
 - ii. the contact information and position of the person accountable for the environmental protection plan and the person responsible for implementing it;
- g) the procedures for the selection, evaluation and use of chemical substances including process chemicals and drilling fluid ingredients;
- h) a description of equipment and procedures for the treatment, handling and disposal of waste material;
- i) a description of all discharge streams and limits for any discharge into the natural environment including any waste material;
- j) a description of the system for monitoring compliance with the discharge limits identified above, including the sampling and analytical program to determine if those discharges are within the specified limits; and
- k) a description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

All documents referenced in the updated concordance table should include the full document name, section and page number. If the updated concordance table references a document, or section of a document, that has not been previously submitted to OROGO as part of this application process, that document must be included with the response to this information request.

OROGO's *Environmental Protection Plan Guidelines and Interpretation Notes* outline the purpose, scope, content and format required to meet the requirements of the OGDPR and can be found on OROGO's website at www.oro.go.gov.nt.ca.