



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

P.O. Box 1320, Yellowknife, NT X1A 2L9

Tel: 867-767-9097 • Fax: 867-920-0798 • Web: www.orogo.gov.nt.ca

Courier Address: 4th floor, 5201 – 50th Avenue, Yellowknife, NT X1A 3S9

Chris Moger
Surface Landman
Suncor Energy Inc.
PO BOX 2844
150 – 6TH AVE SW
CALGARY AB T2P 3E3

March 4, 2022

Dear Chris Moger:

**Letter of Decision: Application for an Operations
Authorization, Abandonment of the Tathlina N-18 Well (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) from Suncor Energy Inc. (Suncor) for the abandonment of the Tathlina N-18 well (WID 0790).

Suncor also filed additional information with OROGO in response to the following Information Requests:

Information Request No. 1 – received from Suncor on June 29, 2021;
Information Request No. 2 – received from Suncor on August 17, 2021; and
Information Request No. 3 – received from Suncor on September 30, 2021.

On October 28, 2021, Suncor's application was deferred, pending completion of a preliminary screening under the *Mackenzie Valley Resource Management Act* (MVRMA) and confirmation that Suncor's Benefits Plan had been approved by the Minister of Industry, Tourism and Investment.

The preliminary screening was completed by the Mackenzie Valley Land and Water Board (MVLWB) on November 10, 2021, and confirmation of Benefits Plan approval was received on February 17, 2022.

The Regulator, designated under section 121 of the *Oil and Gas Operations Act* (OGOA), may issue an Operations Authorization under section 10(1)(b) of that act. On August 2, 2020, the Commissioner in Executive Council designated me as the Regulator under section 121 of OGOA.

.../2

The Regulator, or its delegate, must fulfill its obligations as a regulatory authority under MVRMA. It must also determine the adequacy of Aboriginal consultation, where a decision has the potential to adversely impact an asserted or existing Aboriginal right.

I make the following findings with respect to Suncor's application for an Operations Authorization:

1. Proposed Activities – Suncor's application and supplemental information submissions satisfy the application requirements of OGOA and the *Oil and Gas Drilling and Production Regulations* in relation to the proposed activities. I am persuaded that Suncor intends to conduct the proposed activities in a manner consistent with the purposes set out in OGOA.
2. Preliminary Screening – Suncor applied to the MVLWB for Land Use Permit (LUP) MV2021X0015 to abandon the Tathlina N-18 well. The MVLWB completed a preliminary screening of the application on November 10, 2021. I have determined that the MVLWB's preliminary screening of LUP MV2021X0015 meets my obligations as a regulatory authority under the MVRMA and I have adopted the preliminary screening. I have notified the Mackenzie Valley Environmental Impact Review Board of this determination.
3. Land Use Plan Conformity – The proposed activities take place in the South Slave administrative region of the NWT. They do not fall within the boundaries of a Land Use Plan approved under the MVRMA. Therefore, there is no requirement to assess land use plan conformity under the MVRMA.
4. Indigenous and community consultation – Suncor has conducted consultation and engagement activities with the Deh Gah Got'ie Dene First Nation Council, the Dene Tha' First Nation, the Fort Providence Metis Council, the Ka'a'gee Tu First Nation, the K'atl'odeeche First Nation, and the West Point First Nation. The proposed abandonment program is intended to reduce impact on existing or asserted Aboriginal rights by abandoning the Tathlina N-18 well. Considering the nature and scale of the activity and the concerns raised, consultation undertaken by Suncor on the activities proposed under OA-2021-002-SUN is adequate.

5. Proof of Financial Responsibility – On March 3, 2022, Suncor provided satisfactory proof of financial responsibility in accordance with sections 13 and 64(1) of OGOA. This proof of financial responsibility must remain in force for the duration of the activity.
6. Safety – I have consulted with the Chief Safety Officer, in accordance with section 12 of OGOA, and am satisfied with the safety of the proposed activities.

Suncor's application is approved, subject to the terms contained in the attached Operations Authorization.

Suncor must post a copy of the attached Operations Authorization in a clearly visible location at the work site.

Sincerely,



Pauline de Jong
Regulator

Encl. Operations Authorization OA-2021-002-SUN

c. Margot Ferguson, Envirosearch Ltd.

OPERATIONS AUTHORIZATION

Subject to the terms listed below, authorization is granted under Section 10 of the *Oil and Gas Operations Act* and Part 2 of the *Oil and Gas Drilling and Production Regulations* to

Company Name Suncor Energy Inc.	Company Operating Licence # NWT-OL-2014-008
Responsible Officer and Title Chris Moger, Surface Landman	


to proceed with the works and activities described in its June 1, 2021 application for

Scope of Work Abandonment of the Tathlina N-18 well (WID 0790)	Settlement Area or Region South Slave
---	--

This authorization may be varied by the Regulator or its delegate under Section 10 of the *Oil and Gas Operations Act*.

This authorization expires on November 1, 2023.

Dated at Yellowknife, Northwest Territories on March 4, 2022.

Name of Regulator / Delegate Ms. Pauline de Jong	Signature of Regulator / Delegate 
Title Regulator	

ADDITIONAL TERMS

1. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with the requirements of the *Oil and Gas Operations Act* and the *Oil and Gas Drilling and Production Regulations*, as well as any other acts or legislation as may apply.
2. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with any guidelines and/or interpretation notes issued by the Regulator under section 18 of the *Oil and Gas Operations Act*.
3. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with the specifications, standards and other information referred to in its application and subsequent submissions.
4. Suncor Energy Inc. shall request approval from the Regulator prior to undertaking any change to or deviation from the authorized work or activities, including but not limited to key personnel, the safety plan, the environmental protection plan and contingency plans.
5. Suncor Energy Inc. shall submit to OROGO an updated operator contact list for this program prior to any work or activity.
6. Suncor Energy Inc. shall provide all staff and contractors for this program with its Emergency Response Plan and the OROGO 24-hour Incident Reporting phone number (867-445-8551) prior to commencing any work or activity.
7. Pursuant to section 67 of the *Oil and Gas Drilling and Production Regulations*, Suncor Energy Inc. is approved to conduct controlled venting and/or flaring of gas as part of well kill operations at a maximum daily flow rate of $29.93 \times 10^3 \text{ m}^3/\text{day}$ for a maximum daily duration of 4.0 hours per day. Suncor Energy Inc. shall include the volume, flow rate and composition of any amount of vented gas in its daily report to OROGO. Flaring and/or venting of any volume, daily flow rate and/or duration greater than the approved maximum daily flow shall be reported to OROGO as an incident under section 75 of the *Oil and Gas Drilling and Production Regulations*.
8. Suncor Energy Inc. shall submit consolidated Safety, Environmental Protection and Contingency Plans 30 days after issuance of this Operations Authorization. These plans should include the respective concordance tables, updated information and finalized organizational chart with key personnel names and contact information.