



Suncor Energy Inc.
P.O. Box 2844
150 – 6th Avenue S.W.
Calgary, Alberta T2P 3E3
Tel: (403) 296-4960
www.suncor.com

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Office of the Regulator of Oil and Gas Operations (OROGO)
Government of the Northwest Territories
4th Floor Northwest Tower
5201 – 50th Avenue
Yellowknife NT
X1A 3S9
Email: OROGO@gov.nt.ca

Sent Via Email

Attention: Pauline de Jong

**RE: INFORMATION REQUEST No. 3: SUNCOR ENERGY INC.
Proof of Financial Responsibility – Additional Information Required (OA-2021-003-SUN)**

Suncor Energy Inc. (Suncor) has received Information Request No. 3: Proof of Financial Responsibility – Additional Information Required (OA-2021-003-SUN), dated August 10, 2021. Upon further review OROGO has requested additional information for OA-2021-003-SUN for an estimate of the cost to clean up the worst-case scenario that could occur from a spill or debris during the operations which includes information on the third-party costs to; construct new access in the event that a spill is discovered after the winter work season is completed and camp / accommodations costs to house third party personnel.

Suncor and Bowron Environmental Group believe the worst-case scenario for Tweed Lake and Bele wells (OA-2021-003-SUN) involving a diesel spill from a 30.0m³ tank and / or a tanker transport truck, has been allocated appropriately in the security deposit amount with respect to the size of the abandonment program, and the minimal volumes of diesel that will be onsite during the execution of the project.

The initial program is designed to ensure the proper precautions are in place to locate a significant loss of containment prior to the end of the winter season, which includes but is not limited to:

- Monitoring diesel volume via float or meter on storage tank and truck during filling process, indicating an immediate issue if the load volumes do not match storage tank volume.
- Volume balancing during the billing / ticketing process.
- No significant volumes of fuel or other potentially hazardous substances will be stored on site.
- On-site tanks will not be filled towards the end of the season to ensure no fuel is left on site.
- Daily site inspections conducted by Suncor Personnel, and Environmental Monitors.

In the event a release was to occur during the beginning of the season, during maximum diesel tank fills, the impacted area will be remediated prior to closure of the winter access roads.

Monitoring and ongoing reclamation for Summer 2023, including transportation (helicopter), crew size, accommodations (lodging and food) are estimated at \$303,255.00 (15% contingency included).

Ongoing monitoring and reclamation cost for subsequent years (2024 & 2025) including transportation (helicopter), crew size, accommodations (lodging and food) are estimated at \$206,022.50 per year (15% contingency included). The total estimate for monitoring and ongoing reclamation is \$715,300.00 (using third parties). Detail costs can be reviewed in *APPENDIX B – Information Request No 1 – Proof of Financial Responsibility – Worst Case Scenario Description and Cost Estimates* submitted in response to IR# 1

Suncor is committed to complete this abandonment program in a safe and environmentally responsible manner, to ensure proper abandonment and reclamation of these wells. Suncor and Bowron Environmental Group entrusts that the information outlined within this estimate meets the expectations of Office of the Regulator of Oil and Gas Operations (OROGO). In the event that additional information is required, please do not hesitate to contact the undersigned.

Warm regards,



Paul Carpentier

Project Lead Development – Exploration & Production

Suncor Energy Inc.

pcarpentier@suncor.com

Phone: (587) 646-9482

Cc.

Margot Ferguson- EnviroSearch

Chris Moger - Suncor Energy Inc.

Jeff Deitz – Bowron Environmental Group