

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

September 21, 2021

Dear Chris Moger:

**Information Request No. 4: Suncor Energy Inc.
Technical - Additional Information Required (OA-2021-003-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 Tweed Lake M-47 (WID 1475), Tweed Lake A-67 (WID 1555) and the Bele O-35 (WID 1600) wells (OA-2021-003-SUN) in the Sahtu Region from Suncor Energy Inc. (Suncor).

OROGO has reviewed the information provided by Suncor in its response to Information Request No. 2 and requires additional information in order to complete its review of Suncor's OA application, as set out in the attached Information Request No. 4.

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

Please submit your response on or before 4:00 p.m. on October 4, 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: orogo@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. 4

4.1 Contingency Plan

Preamble:

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

Suncor identified that the requirements of section 6(j) of the OGDPR are met through the *Interim DCL ERP NWT* (Interim ERP) section 6.5.6, pg. 134. While this document was not listed in the documents submitted in response to Information Request #2, it was found in appendix 7 of the *2020-2023 Safety Plan – OA Application Revision 1 with Appendices*.

Upon review of this Interim ERP, Pg. 134 to refers to the containment, recovery, and clean-up of spills to land in the summer. Section 6.5.6 of this document refers to the Spill Reporting Flow Chart for the Northwest Territories.

Neither of these sections of the Interim ERP meets the requirements of section 6(j) of the OGDPR as environmental protection, safety mitigation measures, procedures and coordination measures are not fully encompassed.

Request:

Please provide an integrated, **site-specific** Emergency Response Plan, supporting documentation, 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 and the *Contingency Plan Guidelines and Interpretation Notes* can be found.

All documents referenced in the concordance table should include the full document name, section, page number and appendix number of the parent document where it is located (if not a stand-alone document). 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. Referenced page numbers in the concordance table must correspond to the page numbers in the document.

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.oroogo.gov.nt.ca.

4.2 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*.

Suncor references that section 8(e) of the OGDPR is met through the Suncor Operational Management Excellence System (OEMS) in section 9.2.2 on Page 10.

Upon Review of the documents provided as part of the application process and information requests, there are OEMS documents found in:

- Application Suncor Colville OA – Section 6;
- 2020-2023 Management Systems - OA Application Rev0 with Appendices – Appendix 2; and
- 2020-2023 Safety Plan - OA Application Rev1 with Appendices – Section 6

The OEMS documents included in section 9.2.2 did not include a list of all structures, facilities, equipment and systems critical to safety and did not include a summary of the system in place for their inspection, testing and maintenance as required by section 8(e) of the OGDPR.

Suncor also states that section 8(g) of the OGDPR is met through a third party compliance management repository system that proactively manages risk, compliance, drives sustainable performance and keeps people and assets safe.

The information submitted by Suncor is insufficient for OROGO to determine if this third party system is compliant with the OGDPR.

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 OGDPR can be found. Specifically, the concordance table must include the following references:

- 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;

- 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 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. Referenced page numbers in the concordance table must correspond to the page numbers in the document.

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.oroogo.gov.nt.ca.

4.3 Environmental Protection Plan

Preamble:

Suncor's updated Environmental Protection Plan (EPP) states that section 9(e) of the OGDPR is not included in this plan since:

“Contractor Selection has not been completed to date, as per OEMS Element 9 Suncor will work with companies to ensure that equipment and systems critical to environmental protection will be compliant with required inspection, testing, and maintenance.”

Element 9 establishes the processes and requirements for the implementation, application and monitoring of engineering and administrative controls for the identified risks.

This element does not provide the required information to meet section 9(e) of the OGDPR which requires that the EPP include 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.

OROGO does not require information on the specific piece of equipment or structure (ie. Serial Number, Testing Certification) but instead needs to know that the appropriate equipment and structures will be in place for this type of operation.

Request:

Please provide an updated Environmental Protection Plan, supporting documentation and concordance table, as one complete and consolidated document, 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:

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. This includes a stand alone, current copy of the Suncor OEMS Manual.

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.