



June 8, 2023

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

Sent Via Email

Attention: Pauline de Jong, Regulator OROGO

**Re: Request for Extension of Deadline for Abandonment of the Tweed Lake M-47 (WID1475),
Tweed Lake A-67 (WID1555) and Bele O-35 (WID1600) Wells (OA-2021-003-SUN)**

Dear Madam:

Suncor Energy Inc. (Suncor) is requesting to extend the deadline for the Abandonment of the Tweed Lake M-47, Tweed Lake A-67, and Bele O-35 wells to March 31, 2026. Over the last two and a half years, Suncor has been working with communities in the Sahtu Region to develop a resourcing plan to meet regulatory requirements and ensure benefits to the local communities by complying with the Benefits Plan. We currently do not have a viable civil construction option from the K'ahsho Got'ine District, which impacts our project schedule to deliver safe and reliable operations by March 31, 2025.

Suncor remains committed to working with OROGO and local communities in completing the abandonment of these wells as required.

If you have any further questions or concerns, please do not hesitate to contact me.

Thank you,

DocuSigned by:
Lai-Shang Woo
41DBE3FE00A7420...

Lai-Shang Woo

Director Development - Legacy Properties

E&P & In Situ

Suncor Energy Inc.

lwoo@suncor.com

Phone : 403-993-5649





Attachment : Rationale Document

Request:

Suncor Energy Inc. (“Suncor”) is formally requesting OROGO’s consideration of an extension to the abandonment deadline for the Tweed Lake M-47 (WID1475), Tweed Lake A-67 (WID1555) and Bele O- 35 (WID1600) Wells (OA-2021-003-SUN) to March 31, 2026.

Rationale:

Suncor has been working with the local communities on this project over the last two and a half years to ensure benefits to the communities and compliance to the Benefits Plan. When possible, Suncor will endeavor to procure equipment and services from local communities in the vicinity of the project area (K’ahsho Got’ine District within the Sahtu Region).

Suncor has been engaging with the following organizations to obtain a satisfactory resourcing plan:

- K’ahsho Got’ine Land Corporation
 - Behdzi Ahda’ First Nation / Ayoni Keh Land Corporation
 - Fort Good Hope Dene Band / Yamoga Land Corporation
 - Fort Good Hope Metis Nation Local #54 Land Corporation

Last year, the Behdzi Ahda’ First Nation / Ayoni Keh Land Corporation had a civil construction partnership that Suncor was looking to utilize that could provide the necessary resourcing support required for the well abandonments. Unfortunately, that civil construction partnership has been dissolved leaving Suncor with no viable civil construction options from the K’ahsho Got’ine District. This led to our Dec 2022 successful request to extend our abandonment deadline from March 31, 2024, to March 31, 2025.

Over the last several months, Suncor has been actively reaching out to the K’ahsho Got’ine directly with no response. In April, Suncor contacted an unelected member of the Behdzi Ahda’ First Nation and provided that individual with an update. At the end of May, Suncor received an email from the same individual indicating interest in discussing the scope of our work this summer so that they can meet with some people that might be able to support this work, but no further detail or firm dates yet.

Suncor requires substantial resourcing support to plan and execute our operations safely. With the current status of communications and project planning, we request another one-year delay to provide an opportunity for K’ahsho Got’ine Land Corporation and applicable businesses located in adjacent communities (Norman Wells, Tulita & Deline) to better understand Suncor’s requirements and submit a proposal.





Suncor's EH&S Policy – Safety Above All Else

Suncor is looking forward to collaborating with local contractors that are interested in pursuing procurement opportunities to ensure that such contractors meet or exceed our commitment to a healthy and safe workplace. Suncor's Supply Chain and EH&S processes include contractors' pre-qualification requirements, EH&S plan development, a review of safe work practices, process and procedures that exceed industry best practices. The pre-qualification and review process could take up to 12 months to complete.

Tentative Operations Schedule

- Mobilization of early works equipment in February 2025
- Start of Winter Construction November 2025 (weather dependent)
- Wells Abandonment commence - January 2026

Safety, Environmental Protection & Conservation of Oil & Gas Resources

Tweed Lake M-47 (WID1475), Tweed Lake A-67 (WID1555) and Bele O-35 (WID1600) wells are suspended Level II exploratory wells. Based on the Revised Well Suspension and Abandonment Guidelines and Interpretation notes, inspection frequency is every 5 years.

All three wells were inspected in summer 2019 with reports submitted to OROGO without concerns. Based on reports and Suncor's interpretation, the safety and environmental risk in relation to these wells continues to be very low. Suncor plans to inspect these three wells in summer 2024 as per the schedule.

