



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Lai-Shang Woo
Director Development – Legacy Properties
E&P and In-Situ
Suncor Energy Inc.
PO BOX 2844
150 – 6 AVE SW
CALGARY AB T2P 3E3

June 14, 2023

Dear Lai-Shang Woo:

Information Request No. 5: Request to Vary OA-2021-003-SUN variation 1

On June 8, 2023, the Office of the Regulator of Oil and Gas Operations (OROGO) received a request from Suncor Energy Inc. (Suncor) to vary OA-2021-003-SUN variation 1 by further extending the deadline for abandoning Suncor's wells in the Sahtu Settlement Area to March 31, 2026.

OROGO has reviewed the information provided by Suncor in its letter of June 8, 2023, and requires additional information to complete its review of Suncor's request, as set out in the attached Information Request No. 5.

Please send your written responses and any associated correspondence to OROGO on or before 4:00 p.m. on June 28, 2023, by email at oro.go@gov.nt.ca or through OROGO's secure file transfer site.

If you are unable to respond within this timeframe or have any questions, please contact OROGO at 867-767-9097 or by email at oro.go@gov.nt.ca.

Sincerely,

Pauline de Jong
Regulator

- c. Greg Hundseth, Suncor Energy Inc.
- Dara Schmidt, Suncor Energy Inc.
- Chris Moger, Suncor Energy Inc.
- Dean Tymko, Suncor Energy Inc.
- Paul Carpentier, Suncor Energy Inc.
- Matt Crockett, Suncor Energy Inc.

Suncor Energy Inc.
Application to Vary OA-2021-003-SUN
Information Request No. 5

5.1 Local Capacity

Preamble:

In the rationale attached to its letter of June 8, 2023, Suncor states it has been attempting to obtain support services from local communities in the K'ahsho Got'ine District of the Sahtu Settlement Area for its well abandonment operations for 2.5 years. Those efforts have been unsuccessful.

This is the same situation Suncor identified in its December 12, 2022, request to defer these well abandonment operations to winter 2025.

It is not clear that local communities have the capacity, or interest, to offer suitable support services for Suncor's planned operations.

Request:

Please provide documentary evidence (for example, letters or emails) that local communities have the capacity to offer suitable support services and are interested in doing so.

5.2 Obtaining Services Elsewhere

Preamble:

In the rationale attached to its letter of June 8, 2023, Suncor states "when possible, Suncor will endeavor to procure equipment and services from local communities". While this is an admirable goal, it is not a requirement of the *Oil and Gas Operations Act* or of Suncor's Operations Authorization.

It is not clear whether Suncor has made attempts to comply with the current deadline for abandoning its suspended wells in the Sahtu Settlement Area (March 31, 2025) by obtaining the services it requires elsewhere in the Northwest Territories or elsewhere in Canada.

Request:

Please provide more information on Suncor's efforts to obtain the services required to complete its well abandonment operations by March 31, 2025. Include information on:

- The type of service;
- How many possible other providers were considered;
- The location of those possible providers;

- Whether those possible providers already meet Suncor's EH&S Policy requirements; and
- Why Suncor chose not to proceed with these providers.

5.3 Mobilization of Early Works Equipment

Preamble:

In the rationale attached to its letter of June 8, 2023, Suncor provides a tentative operations schedule that shows mobilization of early works equipment in February 2025.

It is not clear what equipment is to be mobilized, how it will be moved to Colville Lake, and where it will come from.

Request:

Please provide more information on the mobilization of early works equipment, including:

- The types of equipment to be mobilized;
- Where the equipment will be mobilized from; and
- How the equipment will be mobilized to Colville Lake (for example, by barge, winter road, or combination of the two).

5.4 Schedule for Completing Well Abandonments

Preamble:

In the rationale attached to its letter of June 8, 2023, Suncor provides a tentative operations schedule containing three items:

- Mobilization of early works equipment – February 2025
- Start of winter construction – November 2025 (weather dependent)
- Start of well abandonment operations – January 2026

Suncor also describes its health and safety pre-qualification and review process for contractors, which could take up to 12 months to complete.

It is not clear how Suncor will complete all the necessary steps, including securing contractors and equipment, to meet its proposed start of well abandonment operations in January 2026.

Request:

Please provide a Gantt chart for the project, starting in July 2023 and ending with well abandonment operations in winter 2026. The Gantt chart should identify all key tasks and milestones required to meet Suncor's proposed start of operations in January 2026, including a date by which all contractors must be secured.