



Suncor Energy Inc.
P.O. Box 2844
150 - 6th Ave. S.W.
Calgary, AB T2P 3E3
Tel 403 296 8000
Fax 403 296 3030
www.suncor.com

October 21, 2024

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, Executive Director, OROGO
Re: Information Request No. 8: Request to Vary OA-2021-003-SUN

Dear Pauline:

Please find the information requested by OROGO as set out in the letter dated October 11, 2024 as follows.

REQUEST:

- Provide a list of all authorizations, licences, permits, or approvals issued by other regulators to Suncor for this project.
- Identify the specific terms or conditions of these authorizations, licences, permits, or approvals that limited Suncor's ability to stage equipment in the Sahtu Settlement Region between January and March 2024.

RESPONSE:

Background

As stated in our Response to Information Request No.7 dated September 27, 2024, in 2023 Suncor determined to consider a more sensible alternative in moving forward with the abandonment of the three subject wells that was intended to satisfy all regulatory requirements. This included a re-evaluation of the possible abandonment methodologies to be employed and a detailed geological review. This review process also facilitated the potential for Behdzi Ahda' First Nation to establish a new partnership with a third party to assist Suncor in the implementation of the abandonment program.

The February 21, 2024, decision to revise the Suspended Well Compliance Assessment for these wells to remove the requirement for remedial isolation of the uncemented portion of the wellbore allowed Suncor and the local community to move forward with an updated proposal utilizing a heli-abandonment methodology. In this regard, Suncor believed that the request for an administrative extension was prudent. Colville Lake has subsequently aligned with a third party and Suncor is securing services from the community that are required for a spring/summer operation.

Benefits Plan Obligations

- The Northwest Territories Oil and Gas Operations Act (OGOA) requires that the Project operator develop a Benefits Plan that provides for economic opportunities for Canadians. The Benefits Plan Guidelines for Northwest Territories Petroleum Lands, developed by the Department of Industry, Tourism and Investment, provides further information on the development of a Benefits Plan.
- The Minister's approval of the Benefits Plan relating to the Colville Lake abandonment project was received on February 14, 2022. This Benefits Plan has been prepared to fulfill the requirements under Section 17 of the OGOA.

Land Use Permit S22A-001 and Type B Water Licence S22L1-001 Conditions

- The Sahtu Land and Water Board (Board) issued Suncor a Land Use Permit S22A-001 (Permit) and Type B Water Licence S22L1-001 (Licence) for the Well Abandonment and Final Closure Project, Tweed Lake Area in accordance with the Mackenzie Valley Resource Management Act (MVRMA).
- The Permit is issued for the purpose of well abandonment, site remediation and final closure and reclamation of well leases located south of Colville Lake (Bele O-35) and southwest of Colville Lake (Tweed Lake A-67 and Tweed Lake M-47). Land Use Permit S22A-001 has been granted for a term of five years, effective August 22, 2022, and expiring August 21, 2027.
- It is a condition of this permit that the permittee comply with the provisions of the *Mackenzie Valley Resource Management Act and Regulations*. A failure to comply may result in suspension or cancellation of the permit by the Board. Management Plans approved by the Board include Condition 78, ENGAGEMENT PLAN – Engagement Plan and Record that provides:
 - Condition 78: The Permittee shall comply with the Engagement Plan, once approved, and shall annually review the plan and make any necessary revisions to reflect changes in operations or as directed by the Board. Revisions to the plan shall be submitted to the Board for approval.
- In addition, the Permit requires that **“Suncor must take all possible efforts to bring benefits to the local communities through economic opportunities and partnerships for the abandonment Project.”**
- The Board also provided several reasons for the decision to issue the Permit and Licence which included the following:
 - It is the opinion of the Board that the Engagement Plan and Record includes provisions for comprehensive, meaningful, and ongoing engagement efforts with the local community to address concerns, to improve understanding of Project activities and potential effects, and to participate in the development of closure objectives, criteria and options, especially in regard to the sumps, and has approved the Engagement Plan.
 - To the best of their ability and in accordance with the scale of their Project activities and budget, Suncor will provide opportunities and benefits to local communities and land claim organizations through employment and training, hiring of Sahtu businesses and local contractors.

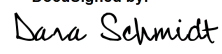
We trust that the foregoing satisfies OROGO's Information Request No. 8 as we have provided a list of all authorizations, licences, permits, or approvals issued by other regulators to Suncor for this project and we have identified the specific terms or conditions of these authorizations, licences, permits, or approvals that limits Suncor's ability to stage equipment in the Sahtu Settlement Region between January and March 2024.

As stated in our Response to Information Request No.7 dated September 27, 2024, the subject wells are compliant with the suspension requirements established in the Well Suspension and Abandonment Guidelines and Interpretation Notes (Abandonment Guidelines). Further delaying the abandonment does not increase a risk for the wells themselves or the spring 2025 scheduled abandonment operations. Suncor believes that in order to be successful in entering the K'asho Got'ine District within the Sahtu Region and completing the abandonment work in the region, a collaborative approach that makes all possible efforts to bring benefits to the local communities through economic opportunities and partnerships for the abandonment Project with compliance with the Minister's approved Benefits Plan is required. In this regard, Suncor respectfully requests that OROGO accept the request for an extension to our abandonment deadline from March 31, 2025 to October 31, 2025.

Closure

We trust that the description provided will satisfy your current requirements and provides suitable documentation for your records. If OROGO has any questions or concerns with the proposed path forward, Suncor requests a meeting to further discuss.

Thank you,

DocuSigned by:

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Dara Schmidt

Development Lead, Legacy Properties

Suncor Energy Inc.

daraschmid@suncor.com