



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

P.O. Box 1320, Yellowknife, NT X1A 2L9

Tel: 867-767-9097 • Fax: 867-920-0798 • Web: www.oroogo.gov.nt.ca

Courier Address: 4th floor, 5201 – 50th Avenue, Yellowknife, NT X1A 3S9

Greg Heffel
Suncor Energy Inc.
PO BOX 2844
150 – 6 AVE SW
CALGARY AB T2P 3E3

Dara Schmidt
Suncor Energy Inc.
PO BOX 2844
150 – 6 AVE SW
CALGARY AB T2P 3E3

December 19, 2024

Dear Greg Heffel and Dara Schmidt:

Information Request No. 9: Request to Vary OA-2021-003-SUN

On September 27, 2024, the Office of the Regulator of Oil and Gas Operations (OROGO) received information from Suncor Energy Inc. (Suncor) in support of its request to vary OA-2021-003-SUN variation 1 to reflect operations in summer 2025. On November 29, 2024, Suncor confirmed its intent to proceed with summer operations in 2025.

OROGO has reviewed the information provided by Suncor on September 27, 2024, and requires additional information to complete its review of Suncor's request, as set out in the attached Information Request No. 9.

Please send your written responses and any associated correspondence to OROGO on or before 4:00 p.m. on January 13, 2025, by email to oroogo@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 oroogo@gov.nt.ca.

Sincerely,



Pauline de Jong
Regulator

Attachment: Information Request No. 9

Suncor Energy Inc.
Application to Vary OA-2021-003-SUN
Information Request No. 9

9.1 Safety Plan

Preamble:

On May 31, 2021, Suncor submitted a Safety Plan (SP) as part of its application package for OA-2021-003-SUN. This SP was based on winter well abandonment operations supported by winter road access to the well sites.

OROGO issued two rounds of Information Requests (IRs) associated with the SP:

- IR No. 2, issued on June 25, 2021, which Suncor responded to on August 17, 2021.
- IR No. 4, issued on September 21, 2021, which Suncor responded to on October 20, 2021.

On October 7, 2022, the Regulator issued OA-2021-003-SUN. Term #5 required Suncor submit to OROGO:

“...consolidated safety, environmental protection and contingency plans by November 9, 2022. These plans should include the respective concordance tables, updated information and finalized organizational chart with key personnel names and contact information.”

On November 1, 2022, Suncor submitted a consolidated SP and a concordance table to OROGO.

On September 27, 2024, Suncor submitted proposed amendments to its SP to OROGO to reflect a change to summer operations using heli-portable equipment. Attachment 4 of Suncor's September 27, 2024, submission identifies:

- Site access and medical support by helicopter and fixed wing aircrafts rather than winter road.
- Operational support from Norman Wells and Colville Lake.
- Equipment inspection to ensure safe operations.

However, the proposed amendments do not specify the following pertinent details:

- Location and availability of rotary-wing and fixed wing aircraft during operations to provide timely egress from the site and transportation to a medical facility.
- Location of the medic during operations.

- Location and types of forest fire suppression equipment.
- Location and quantities of safety equipment necessary to mitigate injuries related to potential risks to human health (burns, chemical contact with skin/eyes, inhalation, etc.).

Additionally, page 14 of Suncor's September 27, 2024, submission (in Attachment 3B: Execution Planning Program Addendum) does not contain all applicable contact information. The main OROGO line provided is listed as 867-767-9067 which is inaccurate. The main line is 867-767-9097. The Workers Safety and Compensation Commission is also not listed as a health and safety agency.

Request:

Please provide an updated SP that addresses the requirements listed under sections 5A and 5B of the *Safety Plan Guidelines and Interpretation Notes*. This update should address, but is not limited to the following:

- Location and availability of rotary-wing and fixed wing aircraft during operations to provide timely egress from the site and transportation to a medical facility.
- Location of the medic during operations.
- Location and types of forest fire suppression equipment.
- Location and quantities of safety equipment necessary to mitigate injuries related to potential risks to human health (burns, chemical contact with skin/eyes, inhalation, etc.).
- Updated contact list for the Regulatory Health and Safety Agencies.

9.2 Emergency Response Plan

Preamble:

On May 31, 2021, Suncor submitted an Emergency Response Plan (ERP) as part of its application package for OA-2021-003-SUN. This ERP was based on winter well abandonment operations supported by winter road access to the well sites.

OROGO issued two rounds of Information Requests (IRs) associated with the ERP:

- IR No. 2, issued on June 25, 2021, which Suncor responded to on August 17, 2021.
- IR No. 4, issued on September 21, 2021, which Suncor responded to on October 20, 2021.

On October 7, 2022, the Regulator issued OA-2021-003-SUN. Term #5 required Suncor submit to OROGO:

“...consolidated safety, environmental protection and contingency plans by November 9, 2022. These plans should include the respective concordance

tables, updated information and finalized organizational chart with key personnel names and contact information.”

On November 1, 2022, Suncor submitted a consolidated ERP and a concordance table to OROGO.

On September 27, 2024, Suncor submitted proposed amendments to its ERP to OROGO to reflect a change to summer operations using heli-portable equipment. Attachment 4 of Suncor’s September 27, 2024, submission identifies:

- Site access and medical support by helicopter and fixed wing aircrafts rather than winter road.
- Operational support from Norman Wells and Colville Lake.

However, the proposed amendments do not specify the following pertinent details:

- Location and availability of rotary-wing and fixed wing aircraft during operations to provide timely egress from the site and transportation to a medical facility.
- Location of the medic during operations.
- Equipment and personnel for the mitigation of hazards associated with predator defence.
- Communication equipment and procedures.
- Location and types of forest fire suppression equipment.
- Any changes to the organizational structure for contingency response to reflect summer operations.

Request:

Please provide an updated ERP that addresses the requirements listed under section 5 of *Contingency Plan Guidelines and Interpretation Notes*. This update should address, but is not limited to the following:

- Location and availability of rotary-wing and fixed wing aircraft during operations to provide timely egress from the site and transportation to a medical facility.
- Location of the medic during operations.
- Equipment and personnel for the mitigation of hazards associated with predator defence.
- Communication equipment and procedures.
- Location and types of forest fire suppression equipment.
- Any changes to the organizational structure for contingency response to reflect summer operations.

9.3 Environmental Protection Plan

Background:

On May 31, 2021, Suncor submitted an Environmental Protection Plan (EPP) as part of its application package for OA-2021-003-SUN. This EPP referenced the Environmental Risk Assessment of Worst Credible Scenario also submitted by Suncor on May 31, 2021. Both documents are based on winter well abandonment operations supported by winter road access to the well sites.

OROGO issued two rounds of Information Requests (IRs) associated with the EPP:

- IR No. 2, issued on June 25, 2021, which Suncor responded to on August 17, 2021.
- IR No. 4, issued on September 21, 2021, which Suncor responded to on October 20, 2021.

In its responses to both IRs, Suncor indicated:

- It is developing an EPP for the operation for submission to the Sahtu Land and Water Board in support of its Land Use Permit application.
- It is developing a Waste Management Plan (WMP) for the operation for submission to the SLWB in support of its Land Use Permit application.
- It could not provide 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”, as required under section 9(e) of the *Oil and Gas Drilling and Production Regulations*, because it had not completed contractor selection for the operation.

On October 7, 2022, the Regulator issued OA-2021-003-SUN. Term #5 required Suncor submit to OROGO:

“...consolidated safety, environmental protection and contingency plans by November 9, 2022. These plans should include the respective concordance tables, updated information and finalized organizational chart with key personnel names and contact information.”

On November 1, 2022, Suncor submitted a consolidated Emergency Response Plan (contingency plan) and a concordance table to OROGO. Page 3 of the contingency plan included a list of equipment, although equipment critical to environmental protection was not clearly identified.

On September 27, 2024, Suncor submitted proposed amendments to its EPP to OROGO to reflect a change to summer operations using heli-portable equipment. Attachment 5 of Suncor’s September 27, 2024, submission identifies:

- Site access by helicopter rather than winter road.

- Downgrading of cement as a possible contaminant given proposed changes in downhole abandonment operations.
- An updated organizational structure for the project.

9.3.1 Plans Submitted to the SLWB

Preamble:

On May 31, 2022, Suncor submitted an Environmental Protection Plan (EPP) to the SLWB as part of its application for a Land Use Permit (S22A-001) for the operations under OA-2021-003-SUN. The EPP submitted to the SLWB is significantly more comprehensive than the EPP submitted to OROGO prior to the issuance of OA-2021-003-SUN.

Also on May 31, 2022, Suncor submitted a WMP to the SLWB as part of its application for a Land Use Permit for the operations under OA-2021-003-SUN. Suncor did not submit a WMP to OROGO prior to the issuance of OA-2021-003-SUN.

Neither the EPP nor the WMP submitted to the SLWB was submitted to OROGO, although they are referenced in Suncor's responses to IR No. 2 and No. 4 for OA-2021-003-SUN and were submitted to the SLWB prior to the issuance of that Operations Authorization.

Request:

Please provide the EPP (dated February 2022) and WMP (dated December 2021) submitted to the SLWB.

9.3.2 Identification of Hazards and Measures

Preamble:

The OGDPR requires an EPP include:

- "A description of the hazards that were identified and the results of the risk evaluation" (section 9(c)) and
- "A summary of the measures to avoid, prevent, reduce and manage environmental risks" (section 9(d)).

The EPP submitted by Suncor in its application for OA-2021-003-SUN is based on winter well abandonment operations using winter roads to access the well sites. The EPP submitted by Suncor to the SLWB for Land Use Permit S22A-001, while more comprehensive, is also based on winter well abandonment operations using winter roads to access the well sites.

As Suncor is now proposing summer well abandonment operations using helicopter access, a reassessment of the hazards to the environment and the appropriate measures to address those hazards is required. Specific areas for review include:

- Fuel storage and handling – Summer operations may affect the amount and type of fuel required, how fuel will be transported, and how fuel will be stored.
- Noise impacts – Summer operations, specifically the use of helicopter access, may affect the noise associated with the operation and its impacts on people and wildlife.
- Soil – Summer operations, on unfrozen ground not covered by snow, may increase the potential for soil contamination, ground water contamination, and ground disturbance.
- Permafrost – Summer operations, on unfrozen ground not covered by snow, may increase impacts on permafrost.
- Vegetation – Summer operations, on unfrozen ground not covered by snow, may increase impacts on vegetation and the potential for transmission of non-native species to the area.
- Wildlife – Different wildlife may be present in the project area during summer operations or wildlife may be active in different ways, which may result in impacts not considered in the current EPP.

Request:

Please provide an updated EPP that includes a hazard assessment and description of appropriate measures to address those hazards which reflects summer, heli-portable operations. The updated EPP must address, at a minimum, impacts of summer operations on:

- Fuel storage and handling.
- Noise.
- Soil.
- Permafrost.
- Vegetation.
- Wildlife.

9.3.3 Waste Management

The OGDPR requires an EPP include:

- “A description of equipment and procedures for the treatment, handling and disposal of waste material” (section 9(h)) and
- “A description of all discharge streams and limits for any discharge into the natural environment including any waste material” (section 9(i)).

The EPP submitted by Suncor in its application for OA-2021-003-SUN is based on winter well abandonment operations using winter roads to access the well sites. The WMP submitted by Suncor to the SLWB for Land Use Permit S22A-001, while more detailed with respect to Suncor’s plans for handling waste from its operations, is also based on winter well abandonment operations using winter roads to access the well sites.

As Suncor is now proposing summer well abandonment operations using helicopter access, a reassessment of its plans for waste management is required. Specific areas for review include:

- Contaminated soil – The WMP Suncor submitted to the SLWB indicates “no contaminated soils are anticipated” (Table 4-1, page 6). However, as noted under 9.3.2, above, summer operations may increase the potential for soil contamination, and therefore the need for a robust plan to address this waste material.
- Removal of waste – The WMP Suncor submitted to the SLWB indicates “all wastes will be removed to Alberta or BC for treatment or disposal at approved facilities” (page 7). This is consistent with the information provided in the EPP submitted to OROGO for OA-2021-003-SUN. However, summer operations may affect the transportation of waste materials from the individual well sites (in the absence of a winter road) and the transportation of waste materials from the project area to an approved treatment or disposal facility (in the absence of a winter road from Colville Lake, the nearest community, to Alberta or BC).

Request:

Please provide an updated EPP that includes approaches to waste management which reflect summer, heli-portable operations. The updated EPP must address, at a minimum, impacts of summer operations on:

- Plans to manage contaminated soil.
- Plans for the removal of waste from the well sites and the project area.

9.3.4 Critical Structures, Facilities, Equipment, and Systems

Preamble:

In its responses to IR No. 2 and IR No. 4 for OA-2021-003-SUN, Suncor indicated that it could not provide 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”, as required under section 9(e) of the *Oil and Gas Drilling and Production Regulations*, because it had not completed contractor selection for the operation.

Based on information provided to OROGO during a meeting with Suncor on November 29, 2024, and in Suncor’s written progress update of December 6, 2024, Suncor has now completed contractor selection for the operation. Therefore, Suncor should now be able to respond fully to the requirements of section 9(e) of the OGDPR.

Request:

Please provide an updated EPP that includes a comprehensive 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.