



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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

February 21, 2025

Dear Dara Schmidt:

Information Request No. 10: 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 Suncor's responses to Information Request No. 9, received on February 5, 2025. OROGO requires additional information to complete its review of Suncor's request, as set out in the attached Information Request No. 10.

Please send your written responses and any associated correspondence to OROGO on or before 4:00 p.m. on March 7, 2025, by email to 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

Attachment: Information Request No. 10

Suncor Energy Inc.
Application to Vary OA-2021-003-SUN
Information Request No. 10

10.1 Emergency Response Plan: Communication Equipment and Procedures

Preamble:

Information Request No. 9 (IR9), issued on December 19, 2024, requested an updated Emergency Response Plan (ERP) that included information on communication equipment and procedures.

In its response to IR9, received on February 5, 2025, Suncor states that radio and satellite phones will be used to communicate, but does not provide information on procedures for how communications will be organized during active operations or during an emergency response scenario.

Request:

Please provide an updated ERP that includes communications procedures, which should, at a minimum, address the following questions:

- Who has the communication equipment?
- Is there a system of regular check ins?
- What are the standard operating procedures for communications in the event of an incident?

10.2 Emergency Response Plan – Evacuation Procedures

Preamble:

In its response to IR9, received on February 5, 2025, Suncor provides information on the location and availability of rotary- and fixed-wing aircraft during operations for evacuation during an emergency.

Suncor does not provide evacuation procedures that describe how adequate egress from the wellsite will be maintained for remaining personnel in the event the aircraft is used to evacuate an injured or otherwise affected person.

Request:

Please provide an updated ERP that includes evacuation procedures, including but not limited to procedures for maintaining adequate wellsite egress for remaining personnel in the event the aircraft is used to evacuate an injured or otherwise affected person.

10.3 Environmental Protection Plan – Critical Structures, Facilities, Equipment and Systems**Preamble:**

Information Request No. 9 (IR9), issued on December 19, 2024, requested an updated Emergency Environmental Protection Plan (EPP) that included:

- A comprehensive list of all structures, facilities, equipment and systems critical to environmental protection and
- A summary of the systems in place for their inspection, testing and maintenance.

This information is required to bring the EPP into compliance with the requirements of section 8(e) of the *Oil and Gas Drilling and Production Regulations (OGDPR)*.

In its response to IR9, received on February 5, 2025, Suncor mentions only a pre-operations inspection of the wireline unit and a spill kit. This response is not a comprehensive list of critical structures, facilities, equipment and systems, as required under the OGDPR and requested in IR9.

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 systems in place for their inspection, testing and maintenance. This section of the EPP should include, but is not limited to:

- Procedures for on-site inspections
- Procedures for daily reporting
- Secure storage locations for liquid liabilities
- A communications plan
- A detailed list of spill response equipment appropriate to the nature (type and quantity) of fluids that could be subject to an uncontrolled release on the site
- A comprehensive list of environmental protection equipment such a drip trays, etc.