



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Chris Moger
Surface Landman
Suncor Energy Inc.
PO BOX 2844
150 – 6 AVE SW
CALGARY AB T2P 3E3

March 24, 2025

Dear Chris Moger:

Decision: Variation to OA-2021-003-SUN variation 1

On September 9, 2024, the Office of the Regulator of Oil and Gas Operations (OROGO) received an application from Suncor Energy Inc. (Suncor) to vary OA-2021-003-SUN variation 1. Suncor is requesting a change from winter to summer operations.

Suncor also filed additional information with OROGO in response to the following Information Requests (IRs):

IR No. 7 – issued September 17, 2024; response received September 27, 2024.

IR No. 8 – issued October 11, 2024; response received October 21, 2024.

IR No. 9 – issued December 19, 2024; response received February 5, 2025.

IR No. 10 – issued February 21, 2025; response received March 10, 2025.

On December 2, 2024, based on information received from Suncor, I issued a Notice of Non-Compliance to Suncor for failing to complete well abandonment operations under OA-2021-003-SUN by March 31, 2025. On the same day, I issued Direction to Suncor to complete the abandonment operations by August 31, 2025. This variation to OA-2021-003-SUN does not change the original abandonment deadline of March 31, 2025, or Suncor's non-compliant status.

The Regulator, designated under section 121 of the *Oil and Gas Operations Act* (OGOA), may issue an Operations Authorization under section 10(1)(b) of that Act. The Regulator may vary the terms of an Operations Authorization under section 10(6) of OGOA. On August 2, 2020, the Commissioner in Executive Council designated me as the Regulator under section 121 of OGOA.

The Regulator must fulfill their obligations as a regulatory authority under the *Mackenzie Valley Resource Management Act* (MVRMA). They must also determine the adequacy of Aboriginal consultation, where a decision has the potential to adversely impact an asserted or existing Aboriginal right.

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I make the following findings with respect to Suncor's application to vary OA-2021-003-SUN:

1. Activities Consistent with OGOA – Suncor's original application, request for variation, and supplemental information submissions satisfy the minimum application requirements of OGOA and of section 5 of the *Oil and Gas Drilling and Production Regulations* (OGDPR) in relation to the proposed activities. I am persuaded that Suncor intends to conduct the proposed activities in a manner consistent with the purposes set out in OGOA.
2. Preliminary Screening – The activities originally proposed under OA-2021-003-SUN were subject to preliminary screening by the Sahtu Land and Water Board under Land Use Permit S22A-001. I adopted the preliminary screening determination for S22A-001 and advised the Mackenzie Valley Environmental Impact Review Board of this determination on October 6, 2022. The proposed variation does not change the scope of the project.
3. Land Use Plan Conformity – The proposed activity takes place in the Sahtu Settlement Area and is subject to the Sahtu Land Use Plan. I considered conformity with the Sahtu Land Use Plan when issuing OA-2021-003-SUN. The proposed variation does not affect conformity with the Sahtu Land Use Plan.
4. Indigenous and community consultation – Suncor has conducted consultation and engagement activities with Behdzi Ahda' First Nation, Ayoni Keh Land Corporation, Behdzi Ahda' Renewable Resources Council, K'asho Got'ine Dene Band, K'asho Got'ine Charter Community, Fort Good Hope Metis Nation, Yamoga Land Corporation, K'asho Got'ine District Land Corporation, and Fort Good Hope Renewable Resources Council, as well as others who participated in the preliminary screening process. Since OA-2021-003-SUN was issued, Suncor has demonstrated continued engagement with these organizations. The proposed activities are intended to reduce impact on existing or asserted Aboriginal rights by abandoning the Tweed Lake M-47 (WID1476), Tweed Lake A-67 (WID1555) and Bele O-35 (WID1600) wells. Considering the nature and scale of the activity and the concerns raised, consultation undertaken by Suncor on the activities proposed under this variation to OA-2021-003-SUN is adequate.
5. Proof of Financial Responsibility – Suncor has provided satisfactory proof of financial responsibility in accordance with sections 13 and 64(1) of OGOA. This proof of financial responsibility must remain in force for the duration of the activity and for one year after the Tweed Lake M-47 (WID1476), Tweed Lake A-67 (WID1555), and Bele O-35 (WID1600) wells have been successfully abandoned.
6. Safety – I have consulted with the Chief Safety Officer, in accordance with section 12 of OGOA, and am satisfied with the safety of the proposed activities.

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Suncor's application for a variation is approved, subject to the terms contained in the attached Operations Authorization.

Suncor must post a copy of the attached Operations Authorization in a clearly visible location at the work site.

Sincerely,



Pauline de Jong
Regulator

Encl. Operations Authorization OA-2021-003-SUN variation 4

- c. Dara Schmidt, Suncor
- Greg Heffel, Suncor
- Paul Carpentier, Suncor

OPERATIONS AUTHORIZATION

Subject to the terms listed below, operations authorization **OA-2021-003-SUN variation #4** is granted under Section 10 of the *Oil and Gas Operations Act* and Part 2 of the *Oil and Gas Drilling and Production Regulations* to


Company Name	Operating Licence #
Suncor Energy Inc.	NWT-OL-2014-008
Responsible Officer	
Chris Moger, Surface Landman	

for

Scope of Work	Region
Abandonment of the Tweed Lake M-47 (WID1475), Tweed Lake A-67 (WID1555), and Bele O-35 (WID1600) wells	Sahtu

This authorization, originally issued on October 7, 2022, has been varied by the Regulator of its delegate under Section 10(6) of the *Oil and Gas Operations Act*.

This authorization expires on **November 1, 2025**.

Issued at	Issued on
Yellowknife, Northwest Territories	March 24, 2025
Issued by	Signature
Pauline de Jong, Regulator	

Additional Terms

1. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with the requirements of the *Oil and Gas Operations Act* and the *Oil and Gas Drilling and Production Regulations*, as well as any other acts or legislation as may apply.
2. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with any guidelines and/or interpretation notes issued by the Regulator under section 18 of the *Oil and Gas Operations Act*.
3. Suncor Energy Inc. shall cause the approved work and activities to be conducted in accordance with the specifications, standards and other information referred to in its application dated May 31, 2021, its application for variation dated September 9, 2024, and subsequent submissions.
4. Suncor Energy Inc. shall request approval from the Regulator prior to undertaking any change to or deviation from the authorized work or activities, including but not limited to key personnel, the safety plan, the environmental protection plan and contingency plans.
5. Suncor Energy Inc. shall submit to OROGO the most recent version of the Environmental Protection Plan submitted to the Sahtu Land and Water Board (SLWB) under Land Use Permit S22L1-001, when it is approved by the SLWB.
6. Pursuant to section 67 of the *Oil and Gas Drilling and Production Regulations*, Suncor Energy Inc. is approved to conduct controlled venting and/or flaring as part of well kill operations at a maximum daily flow rate of 29.9 E³m³/day for a maximum daily duration of 4.0 hours per day. Suncor Energy Inc. shall include the volume and composition of any amount of flared and/or vented gas in its daily report to OROGO. Flaring and/or venting of any volume, daily volume rate and/or duration greater than the approved maximum daily flow shall be reported to OROGO as an incident under section 75 of the *Oil and Gas Drilling and Production Regulations*.
7. Suncor Energy Inc. shall provide all staff and contractors for this program with its Emergency Response Plan and the OROGO 24-hour Incident Reporting phone number (867-445-8551) prior to commencing any work or activity.
8. Suncor Energy Inc. shall submit to OROGO an updated operator contact list for this program prior to any work or activity.