

Sherri Evers
Vice President
Imperial Oil Limited
505 QUARRY PARK BLVD.
CALGARY AB T2C 5N1

September 14, 2021

Dear Sherri Evans:

Information Request No. 2: Management, Safety, Emergency and Environmental Protection Plan Compliance - Additional Information Required (OA-2021-004-IMP)

On July 29, 2021, the Office of the Regulator of Oil and Gas Operations (OROGO) received an application for an Operations Authorization (OA) from Imperial Oil Limited (Imperial) for the abandonment of the Jean Marie B-48 well (WID 0448).

OROGO has reviewed the information provided by Imperial and requires additional information in order to complete its review of Imperial's OA application, as set out in the attached Information Request No. 2.

Please send your written responses and any associated correspondence to me by email at orogo@gov.nt.ca or through OROGO's secure file transfer site.

Please submit your response on or before 4:00 p.m. on October 4, 2021. If you are unable to respond within this timeframe or have any questions, please contact OROGO at (867) 765-8160 or by email at orogo@gov.nt.ca.

Sincerely,



Janpeter Lennie-Misgeld
Senior Advisor, Legislation and Policy

Imperial Oil Limited OA-2021-004-IMP
Application for an Operations Authorization
Abandon Jean Marie B-48 Well (WID 0448)
Information Request No. 2

2.1 Management System

Preamble:

The Operations Authorization (OA) application received from Imperial Oil Ltd. (Imperial) on July 29, 2021 provides various operational plans and policies. However, Imperial has not identified a system of integration for the management of financial and human resources to ensure compliance with section 5 of the *Oil and Gas Drilling and Production Regulations* (OGDPR).

Section 5 of the OGDPR requires that Imperial identify the details of an effective management system which integrates operations and technical systems with the management of financial and human resources to ensure compliance with the *Oil and Gas Operations Act* (OGOA) and the OGDPR.

Request:

Please provide a description of Imperial's management system and a concordance table that demonstrates how this system meets the following requirements under section 5 of the OGDPR:

- The processes for setting goals for the improvement of safety, environmental protection and waste prevention;
- The processes for identifying hazards and for evaluating and managing the associated risks;
- The processes for ensuring that personnel are trained and competent to perform their duties;
- The processes for ensuring and maintaining the integrity of all facilities, structures, installations, support craft and equipment necessary to ensure safety, environmental protection and waste prevention;
- The processes for the internal reporting and analysis of hazards, minor injuries, incidents and near-misses and for taking corrective actions to prevent their recurrence;
- The documents describing all management system processes and the processes for making personnel aware of their roles and responsibilities with respect to them;

- The processes for ensuring that all documents associated with the system are current, valid and have been approved by the appropriate level of authority;
- The processes for conducting periodic reviews or audits of the system and for taking corrective actions if reviews or audits identify areas of non-conformance with the system and opportunities for improvement;
- The arrangements for coordinating the management and operations of the proposed work or activity among the owner of the installation, the contractors, the operator and others, as applicable; and
- The name and position of the person accountable for the establishment and maintenance of the system and of the person responsible for implementing it.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 5 of the OGDPR.

Should the updated concordance table reference a document/information source, or relevant section(s) thereof, that have not been previously submitted to OROGO as part of this application process, that document/information source, or relevant section(s) thereof, must be included with the response to this information request.

2.2 Flaring and Venting

Preamble:

Section 4 of the Drilling and Execution Plan that was included in Imperial's OA application states that venting through a degasser and flaring will be needed.

Section 67 of the OGDPR indicates that, outside of an emergency situation, all flaring and venting of gas must be specifically authorized by the Regulator.

Section 6(e) of the OGDPR requires that Imperial describe the venting of gas, including the rationale and the estimated rate, quantity and period of the flaring or venting.

Request:

Please provide an estimated volume of gas for this well operation in compliance with section 6(e) of the OGDPR, in the event that flaring or venting will be required.

2.3 Safety Plan

Preamble:

The Safety Plan submitted as part of Imperial's OA application, received July 29, 2021, does not meet the requirements of the *Safety Plan Guidelines and Interpretation Notes* (Safety Plan Guidelines) or section 8 of the OGDPR.

OROGO would like note the following deficiencies:

- Occupational and process hazards are said to be covered under “General Work Management” but no documents or references are identified for verification that the safety study, identified risks and mitigation measures are appropriately addressed.
- Inclusion of references to a list of all structures, facilities, equipment and systems critical to safety and a summary of the system in place for their inspection, testing and maintenance.
- A detailed organization structure and contact information that includes, but is not limited to senior rig and construction contractors and personnel accountable for compliance with the safety plan.

Request:

Please provide an updated Safety Plan and a concordance table that demonstrates how this system meets the requirements under section 8 of the OGDPR, including:

- A summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in these regulations with regard to safety will be fulfilled;
- A summary of the studies undertaken to identify hazards and to evaluate safety risks related to the proposed work or activity;
- A description of the hazards that were identified and the results of the risk evaluation;
- A summary of the measures to avoid, prevent, reduce and manage safety risks;
- A list of all structures, facilities, equipment and systems critical to safety and a summary of the system in place for their inspection, testing and maintenance;
- A description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains;
 - Their relationship to each other, and
 - The contact information and position of the person accountable for the safety plan and of the person responsible for implementing it.
- A description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

Please also provide a concordance table that demonstrates how Management Systems are related to the requirements of section 8 of the OGDPR.

The concordance tables should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 8 of the OGDPR.

Should the updated concordance table reference a document/information source, or relevant section(s) thereof, that have not been previously submitted to OROGO as part of this application process, that document/information source, or relevant section(s) thereof, must be included with the response to this information request.

2.3 Contingency Plan

Preamble:

The Contingency Plans and associated documents submitted as part of Imperial's OA application, received July 29, 2021, do not fully meet the requirements of the *Contingency Plan Guidelines and Interpretation Notes* (Contingency Plan Guidelines).

The Risk Assessment (Appendix A), Contingency Plans (Appendix B) and the Emergency Response Brochure (Appendix C) do not address the following:

- Comprehensive list of resources and equipment available to respond to an emergency situation as required by section 5B of the Contingency Plan Guidelines;
- A comprehensive list of the regulatory authorities in the Northwest Territories that are applicable to these operations, including but not limited to the GNWT Departments of Lands and Environment and Natural Resources and the Workers Safety and Compensation Commission, as required by section 5B of the Contingency Plan Guidelines;
- Notification requirements for:
 - Territorial and municipal governments;
 - Local First Nations, Indigenous governments and communities; and
 - Federal and territorial regulators.
- Linkages to relevant emergency response information in other plans should be included in the Contingency Plan;
- Consideration of potential limits or delays in access to resources, services or personnel in remote locations.

Request:

Please provide an update to Appendix A, B and C that is compliant with Contingency Plan Guidelines and includes a concordance table to identify where the updated plans meet the requirements of the Contingency Plan Guidelines.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of the Contingency Plan Guidelines.

Should the concordance table reference a document/information source, or relevant section(s) thereof, that have not been previously submitted to OROGO as part of this application process, that document/information source, or relevant section(s) thereof, must be included with the response to this information request.

2.4 Environmental Protection Plan

Preamble:

The Environmental Protection Plan (EPP) submitted as part of Imperial's OA application received July 29, 2021 does not fully meet the requirements of section 9 of the OGDPR.

The EPP does not address the following requirements:

- A comprehensive list of all structures, equipment and systems critical to environmental protection a protection or demonstrate the system in place for their inspection and maintenance;
- A summary of the studies undertaken to identify environmental hazards and to evaluate environmental risks relating to the proposed work or activity, results of that evaluation and measures to avoid, prevent reduce and mange environmental risks;
- A detailed description of the organizational structure and command structure that clearly explains their relationship to each other; and
- Details on how the identified team will ensure compliance and monitoring is achieved and tracked.

Request:

Please provide an updated EPP and a concordance table that demonstrates how this system meets the requirements under section 9 of the OGDPR, including:

- A summary of and references to the management system that demonstrate how it will be applied to the proposed work or activity and how the duties set out in these regulations with regard to environmental protection will be fulfilled;
- A summary of the studies undertaken to identify environmental hazards and to evaluate environmental risks relating to the proposed work or activity;
- A description of the hazards that were identified and the results of the risk evaluation;
- A summary of the measures to avoid, prevent, reduce and manage environmental risks;
- 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;
- A description of the organizational structure for the proposed work or activity and the command structure on the installation, which clearly explains;
 - Their relationship to each other; and
 - The contact information and position of the person accountable for the environmental protection plan and the person responsible for implementing it.

- The procedures for the selection, evaluation and use of chemical substances including process chemicals and drilling fluid ingredients;
- A description of equipment and procedures for the treatment, handling and disposal of waste material;
- A description of all discharge streams and limits for any discharge into the natural environment including any waste material;
- A description of the system for monitoring compliance with the discharge limits, including the sampling and analytical program to determine if those discharges are within the specified limits; and
- A description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives.

The concordance table should include the full document name, date of submission, revision number, section title, and page number for each requirement of section 9 of the OGDPR.

Should the updated concordance table reference a document/information source, or relevant section(s) thereof, that have not been previously submitted to OROGO as part of this application process, that document/information source, or relevant section(s) thereof, must be included with the response to this information request.