



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Lorne Hammer  
Director  
Canadian Petroleum Engineering Inc.  
900, 600 6 AVE SW  
CALGARY AB T2P 0S5

December 16, 2022

Dear Lorne Hammer:

**Information Request No. 1:  
Aurora Training Well Abandonment (ACW-2022-PAR-O-80-WID1866)**

On December 12, 2022, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete Operations Authorization (OA) application from Canadian Petroleum Engineering Inc., on behalf of Aurora College, for the abandonment of the Aurora Training Well G-04 (WID1915) in the Gwich'in Settlement Area.

OROGO has reviewed the information provided by Aurora College and requires additional information to complete its review of Aurora College's OA application, as set out in the attached Information Request No. 1.

Please send your written responses and any associated correspondence to OROGO at [oro.go@gov.nt.ca](mailto:oro.go@gov.nt.ca) or through OROGO's secure file transfer site, on or before 4:00 pm on January 4, 2023. 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](mailto:oro.go@gov.nt.ca).

Sincerely,



Pauline de Jong  
Regulator

Encl. Information Request No. 1

**Information Request No. 1**  
**Auroral Training Well G-04 Abandonment**  
**OA-2022-001-AC**

**1.1 Benefits Plan**

**Preamble:**

Section 3 of Aurora College's application is titled "confirmation of benefits plan approval / waiver". It does not contain confirmation that Aurora College's benefits plan for OA-2022-001-AC has been approved by the Minister of Industry, Tourism and Investment or that the Minister has waived the required for a benefits plan.

Under section 17 of the *Oil and Gas Operations Act*, the Regulator cannot issue an OA without the Minister's approval of or waiver of the requirement for a benefits plan.

OROGO will continue to process Aurora College's application while Aurora College addresses the benefits plan requirements.

**Request:**

Confirm that Aurora College has submitted a benefits plan or a request for a waiver of the benefits plan requirement to the Minister of Industry, Tourism and Investment.

**1.2 Proof of Financial Responsibility**

**Preamble:**

Section 4 of Aurora College's application addresses Proof of Financial Responsibility. It contains information on the Worst Credible Case Scenario and the Worst Case Scenario. However, it does not address the requirements set out in the [Proof of Financial Responsibility Guidelines and Interpretation Notes](#).

**Request:**

Submit an updated application that provides the information required under section 6 of the [Proof of Financial Responsibility Guidelines and Interpretation Notes](#).

**1.3 Contingency Plan (Emergency Response Plan)**

**Preamble:**

Section 10 of Aurora College's application addresses the Contingency Plan or Emergency Response Plan for the proposed operation. The text in section 10 is the same as the text in section 8 (Environmental Protection Plan). There are also two appendices to the application: *Canadian*

*Petroleum Engineering Inc. HSE Manual 2022 and Emergency Response Plan Aurora College Training Well G-04.*

It is not clear which document(s) are intended to fulfil the management systems obligations established in the *Oil and Gas Drilling and Production Regulations (OGDPR)* and the requirements of the [Contingency Plan Guidelines and Interpretation Notes](#), [Environmental Protection Plan Guidelines and Interpretation Notes](#), and [Safety Plan Guidelines and Interpretation Notes](#).

**Request:**

Submit an updated application that clearly identifies which document(s) Aurora College has provided to demonstrate its management systems are sufficient to carry out the proposed activity, along with a concordance table demonstrating how the requirements of the OGDPR and each of the above-mentioned guidelines are being met.

#### **1.4 Safety Plan – Hazard Identification**

**Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5B of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires the plan to include:

- A high-level understanding of the operator's processes for identifying hazards and for evaluating and managing the associated risks for the type of work or activity proposed; and
- Detailed information for the specific work or activity including a summary of the studies undertaken to identify hazards and assess risk and a description of the hazards that were identified.

While the Safety Plan does include a list of higher risk activities, it does not explain how these hazards are assessed and mitigated.

The plan also does not address how hazards are identified.

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5B of the SP Guidelines.

#### **1.5 Safety Plan – Emergency Preparedness and Response**

**Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5C of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires the plan demonstrate how it address emergency preparedness and response, including:

- Plans and procedures; and
- Testing and exercises.

This Safety Plan does not comprehensively identify potential hazards, abnormal situations, emergencies, incidents and accidents that could have an impact on safety and for which contingency plans, including emergency response procedures, have been developed.

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5C of the SP Guidelines.

## **1.6 Safety Plan – Organizational Structure**

**Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5E of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires the plan to identify the organizational structure for the proposed work or activity. It addresses:

- Resources, roles, responsibilities and authority;
- Coordinating management and operations; and
- Commitment, leadership and participation.

While the safety plan does provide a 4-person organizational chart, it is not clear who is responsible for the design and implementation of the Safety Plan, including those responsible for the allocation and management of financial and human resources, as required, to achieve the purpose of the Management System and of the Safety Plan.

A Safety Plan must contain a description of the organizational structure for the proposed work or activity and the command structure on the installation. The description must explain the relationship between the organizational structure and the command structure (section 8(f)(i) of the OGDPR).

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5E of the SP Guidelines.

## **1.7 Safety Plan – Contractors and Supply Change Management**

**Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5F of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires a description of the use of contractors and supply chain management by addressing:

- Operator responsibilities;
- The selection of contractors;
- The operator / contractor relationship; and
- Supply chain management.

The Safety Plan must clearly identify the roles and responsibilities of contractors and describes how the operator and contractors will work together to maintain safety of the work or activity.

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5F of the SP Guidelines.

**1.8 Safety Plan – Monitoring and Measuring Compliance/Performance****Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5H of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires the plan to identify how:

- It supports continuous improvement;
- The operator will monitor and ensure compliance with the plan; and
- Performance indicators the operator will measure and track.

The Safety Plan must include a description of the arrangements for monitoring compliance with the plan and for measuring performance in relation to its objectives (section 8(h) of the OGDPR).

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5H of the SP Guidelines.

**1.9 Safety Plan – Training****Preamble:**

Section 7 of Aurora College's application addresses the Safety Plan. Section 5I of the [Safety Plan Guidelines and Interpretation Notes](#) (SP Guidelines) requires operators provide for safety awareness and competence assurance, including both training and competency assessment, among all personnel.

The Safety Plan should explain how the operator has ensured that personnel are trained and competent to perform their duties and provide references to more detailed information as may be necessary for audit. This may include personnel involved in the planning

The Safety Plan should also summarize and then make reference to the procedures followed to ensure that personnel are trained in operating and maintenance processes

**Request:**

Submit an updated Safety Plan that meets the requirement of section 5I of the SP Guidelines.