



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.oro.go.gov.nt.ca](http://www.oro.go.gov.nt.ca)

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

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

March 3, 2023

Dear Lorne Hammer:

**Information Request No. 3: Aurora Training Well Abandonment (OA-2022-001-AC)**

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 (Aurora College) for the abandonment of the Aurora Training Well G-04 (WID1915) in the Gwich'in Settlement Area. OROGO also received Aurora College's response to Information Request No. 1 on February 6, 2023, and Information Request No. 2 on March 1, 2023.

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. 3.

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 March 13, 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. 3

c Jonathan Michel, Director Aurora Campus, Aurora College  
Ron McCosh, Canadian Petroleum Engineering Inc.

**Information Request No. 3**  
**Aurora Training Well G-04 Abandonment**  
**OA-2022-001-AC**

### **3.1 Public Engagement Record**

**Preamble:**

Section 10 of Aurora College's revised application package, submitted on March 1, 2023, indicates that Aurora College has not yet carried out engagement with the Town of Inuvik and the Gwich'in Tribal Council or with other interested parties.

OROGO must assess the engagement and consultation activities that have been carried out for the proposed activity. The applicant must provide information on engagement and consultation that has already occurred and a plan for further engagement to occur throughout the life of the project (see page 15 of the *Application Guidelines and Interpretation Notes – Well Suspension and Abandonment*).

Aurora College does not appear to have conducted any engagement or consultation on the proposed project to date. Therefore, OROGO cannot assess the engagement and consultation activities which have occurred or determine whether obligations under section 35 of the *Constitution Act, 1982* have been met.

**Request:**

Submit a description of all consultation and engagement activities Aurora College has taken to date, including:

- A list of all parties contacted for the purpose of consultation and engagement, the date(s) of contact, the method used (for example, letter or email), and the information provided.
- A list of any consultation and engagement meetings, the parties involved, the date of the meeting, and a list of issues or concerns identified by the parties.
- A description of how any issues or concerns identified by the parties in consultation and engagement meetings have been or will be addressed by Aurora College.

Submit a plan for further engagement to occur throughout the life of the project.

### **3.2 Benefits Plan**

**Preamble:**

Section 2 of Aurora College's revised application package, submitted on March 1, 2023, indicates that Aurora College will "attempt to submit" a request for a waiver of the requirement for a benefits plan to the Minister of Industry, Tourism and Investment on February 6, 2023. This statement has

not changed from the previous version of the application package, submitted to OROGO on February 6, 2023.

As stated in Information Request No. 1.1, issued on December 16, 2022, section 17 of the *Oil and Gas Operations Act* requires approval of a benefits plan or waiver of the requirement for a benefits plan from the Minister of Industry, Tourism and Investment before an Operations Authorization can be issued.

**Request:**

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

Obtain and provide information from the Department of Industry, Tourism and Investment on the expected timeline for a response to Aurora College's request.

### **3.3 Insurance Coverage**

**Preamble:**

**Section 8** of Aurora College's revised application package, submitted on March 1, 2023, indicates that Aurora College has requested proof of insurance and will provide it to OROGO when it is received from the Insurers. This statement has not changed from the original application package, submitted to OROGO on December 12, 2022.

OROGO requires proof of insurance to assess Aurora College's financial ability to carry out the well abandonment as planned, including the ability to fully implement its safety plan, environmental protection plan, and contingency plans (see page 14 of the *Application Guidelines and Interpretation Notes – Well Suspension and Abandonment*).

**Request:**

Submit proof of insurance for the proposed activity.

### **3.4 Proof of Financial Responsibility**

**Preamble:**

In its response to Information Request 1.2, received on February 6, 2023, Aurora College proposes to provide \$50,000 in Proof of Financial Responsibility for the operation. Aurora College's calculation of the cost of clean-up assumes that the operation will occur during the winter months, when frozen ground and snow cover would reduce the impact of a spill on the surrounding environment.

If Aurora College completes the proposed operation before March 31, 2023, these conditions are likely to hold true.

However, if Aurora College does not complete the proposed operation until later in 2023, the wellsite may no longer be frozen and covered with snow.

**Request:**

Submit a revised worst case scenario, with costing, that reflects the possibility this activity will occur during the summer months.

**3.5 Safety Plan – List of Safety-Critical Items****Preamble:**

Section 8 of the *Oil and Gas Drilling and Production Regulations (OGDPR)* sets out the required contents of a Safety Plan. Section 8(e) of the OGDPR requires a list of safety structures, facilities, equipment and systems and a summary of the system in place for their inspection, testing and maintenance.

Information Request 2.4 requested that Aurora College submit an updated Safety Plan that addressed section 8(e) of the OGDPR.

Section 5 of Aurora College's revised application package, submitted on March 1, 2023, includes a sub-section titled "Worksite Safety – Structures, Equipment and Facilities". It contains a description of the wellsite. It does not contain a list of safety structures, facilities, equipment and systems. Common examples of safety equipment include personal monitors, blow-out preventers, fall protection equipment, etc.

Section 5D of the *Safety Plan Guidelines and Interpretation Notes* describes OROGO's expectations for this component of the Safety Plan.

**Request:**

Submit an updated Safety Plan that addresses section 8(e) of the OGDPR and reflects the expectations established in section 5D of the *Safety Plan Guidelines and Interpretation Notes*.

**3.6 Environmental Protection Plan – List of Safety-Critical Items****Preamble:**

Section 9 of the OGDPR sets out the required contents of an Environmental Protection Plan. Section 9(e) of the OGDPR requires a list of structures, facilities, equipment and systems critical to environmental protection and a summary of the system in place for their inspection, testing and maintenance.

Information Request 2.2 requested that Aurora College submit an updated Environmental Protection Plan that addressed several aspects of section 9 of the OGDPR, including section 9(e).

Section 6 of Aurora College's revised application package, submitted on March 1, 2023, includes a sub-section titled "Structure and Facilities on the Site". It contains a description of the wellsite. It does not contain a list of structures, facilities, equipment and systems for the protection of the environment. Common examples of environmental protection equipment include spill kits, drip trays, and secondary containment for liquids stored on site.

Section 5D of the *Environmental Protection Plan Guidelines and Interpretation Notes* describes OROGO's expectations for this component of the Safety Plan.

**Request:**

Submit an updated Environmental Protection Plan that addresses section 9(e) of the OGDPR and reflects the expectations established in section 5D of the *Environmental Protection Plan Guidelines and Interpretation Notes*.

### **3.7 Environmental Protection Plan – Light and Noise Impacts**

**Preamble:**

Section 6 of Aurora College's revised application package, submitted on March 1, 2023, includes Table A: Air and Atmosphere – Environmental Aspects, Potential Impact, Protection and Mitigation. Noise and light from operations is identified as a potential impact on wildlife and the community in Table A.

The site description contained in Section 6 states that there is a residence approximately 100 meters from the well on an adjacent lot. Therefore, this is the closest dwelling where light or noise could affect residents.

One of the mitigation measures identified for this potential impact in Table A is public consultation before beginning work to identify sensitive areas and schedules. However, as described in Information Request 3.1, it appears Aurora College has not conducted any public engagement or consultation for this activity to date. If this is the case, Aurora College has not discussed the proposed activity with the nearby residents or considered how they may be affected by light and noise from the operation.

**Request:**

In the response to Information Request 3.1, clearly identify any contacts with the residents identified in the site description, identify any specific concerns they have, and describe the mitigations Aurora College has committed to.

If Aurora College has not had contact with these residents, provide a schedule for contacting them to discuss the project.

### **3.8 Environmental Protection Plan – OMS, EMS, and EPP**

**Preamble:**

Information Request 2.2 identified that little detail was provided on the CPE Operations Management System (OMS), the Environmental Management System (EMS), and the Environmental Management Plan (EMP) and that these documents were not provided as part of the application.

In its response to Information Request 2.2 submitted on March 1, 2023, Aurora College provided no additional information on the OMS or the EMP and a few additional bullets associated with the EMS. The information provided is not sufficient to assess whether these documents:

- Demonstrate how the management system will be applied to the proposed activity and how Aurora College will fulfill its environmental protection duties as described in the OGDPR (required under section 9(a) of the OGDPR).
- Demonstrate that Aurora College has adequate arrangements for monitoring compliance with the Environmental Protection Plan and measuring performance in relation to its objectives (required under section 9(k) of the OGDPR).

**Request:**

Provide copies of the CPE OMS, EMS, and EPP referenced in Aurora College's revised application package, submitted on March 1, 2023.

Provide a concordance table that demonstrates which sections of these documents respond to the requirements of sections 9(a) and 9(k) of the OGDPR.

### **3.9 Contingency Plan – Hazard Identification and Mitigation Measures**

**Preamble:**

Section 6(j) of the OGDPR sets out the required contents of a Contingency Plan (Plan). More specifically, section 5B of the *Contingency Plan Guidelines and Interpretation Notes* speaks to the requirements of the Plan to address hazard identification and mitigation measures.

The emergency response plan submitted on March 1, 2023, by Aurora College, identifies potential hazards (fire, explosion, serious injury, etc.) but site-specific considerations have not been appropriately identified.

Page 154 of the submission identifies that a spill is to be reported to regulatory authorities after remediation has begun. Once site personnel are safe and initial spill response has been actioned, the regulatory authorities must be advised through the NT/NU Spill report line. Most regulatory bodies expect this report to happen within 24 hours of the spill so that the polluter can focus on initial tasks and hopefully secure the site.

Page 156 of the submission identifies that in the event of a serious injury or death an immediate report to 'WorkSafeBC' needs to take place. As this operation is taking place in the Northwest Territories, an incident resulting in injury or death need to be reported to OROGO under section 75 of the OGDPR as well as to the NT/NU Workers Safety and Compensation Commission.

Page 158 of the submission discusses "Post Incident Reporting" but does not identify that an investigation report is required 21 days after the incident and must include root cause, causal factors, and corrective action taken as required by section 75 of the OGDPR.

Page 162 of the submission does not identify the notification requirements to OROGO in advance of any media release or interview. Section 75 of the OGDPR requires OROGO to be notified at

least 24 hours in advance of any press release or press conference held by the operator concerning any incident or near-miss during any activity.

**Request:**

Submit an updated Emergency Response Plan that addresses section 6(j) of the OGDPR and reflects the expectations established in section 5B of the *Contingency Plan Guidelines and Interpretation Notes*.

### **3.10 Contingency Plan – Training and Compliance Monitoring**

**Preamble:**

Section 6(j) of the OGDPR sets out the required contents of a Contingency Plan (Plan). More specifically, section 5D of the *Contingency Plan Guidelines and Interpretation Notes* speaks to the requirements of the Plan to address training and compliance monitoring.

The emergency response plan submitted on March 1, 2023, by Aurora College does not include any reference to the training and compliance monitoring requirements.

**Request:**

Submit an updated Emergency Response Plan that addresses section 6(j) of the OGDPR and reflects the expectations established in section 5D of the *Contingency Plan Guidelines and Interpretation Notes*.

### **3.11 Contingency Plan – Change Management**

**Preamble:**

Section 6(j) of the OGDPR sets out the required contents of a Contingency Plan (Plan). More specifically, section 5E of the *Contingency Plan Guidelines and Interpretation Notes* speaks to the requirements of the Plan to address change management.

The emergency response plan submitted on March 1, 2023, by Aurora College does not include any reference to change management.

**Request:**

Submit an updated Emergency Response Plan that addresses section 6(j) of the OGDPR and reflects the expectations established in section 5E of the *Contingency Plan Guidelines and Interpretation Notes*.

### **3.12 Contingency Plan – Map**

#### **Preamble:**

Section 6(j) of the OGDPR sets out the required contents of a Contingency Plan (Plan). More specifically, the *Contingency Plan Guidelines and Interpretation Notes* speak to the requirements of the Plan.

Page 167 of the emergency response plan submitted on March 1, 2023, by Aurora College references access description and a map that are not included in the document.

#### **Request:**

Submit an updated Emergency Response Plan that includes access description and a map.