



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.oroogo.gov.nt.ca

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

Jonathon Michel  
Director, Aurora Campus  
Aurora College  
PO BOX 1008  
INUVIK NT X0E 0T0

July 31, 2023

Dear Jonathon Michel:

**Decision: Request for Exemption from Cement Evaluation Requirements - Denied**

On July 25, 2023, the Office of the Regulator of Oil and Gas Operations (OROGO) received Aurora College's response to Information Request (IR) No. 6 for OA-2022-001-AC.

IR 6.2 directed Aurora College to submit a detailed explanation of any requested exemptions from the *Well Suspension and Abandonment Guidelines and Interpretation Notes* (Guidelines) issued by the Regulator under section 18 of the *Oil and Gas Operations Act*, including "a rationale for each exemption, including a demonstration that Aurora College's proposed approach meets or exceeds the standards established in the Guidelines for the protection of human safety and the environment [as described in section 1 of the Guidelines]."

Aurora College's response to IR 6.2 requests that I reconsider my March 8, 2023, decision to deny Aurora College's February 14, 2023, request for exemption from the cement evaluation requirements contained in section 6A of the Guidelines. The purpose of cement evaluation is to determine whether any repairs or remedial cementing are needed to meet the requirements of the *Oil and Gas Drilling and Production Regulations* (OGDPR) for abandoned wells. Section 56 of the OGDPR requires that an abandoned well isolate all oil or gas bearing zones, discrete pressure zones, and potable water zones.

To reconsider a decision, new information must be available to the Regulator. In its response to IR 6.2, Aurora College states:

"This is a unique scenario for Aurora College is they're not in the business of doing Oil and Gas work, transporting equipment necessary to carry out cement evaluation log ... with specialized equipment from BC or Alberta is a significant cost to the organization and is a substantial expense."

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The response refers to an email from Jeff O’Keefe, Vice President, Aurora College, to OROGO on July 10, 2023. This email presents the following information:

- Aurora College drilled the well in partnership with several other organizations but is now “the last man standing”.
- There were no financial benefits from the training for which the well was drilled.
- Aurora College had not planned for the expense of abandoning the well, including the cement evaluation required under the Guidelines.

In its February 14, 2023, application for a waiver of the cement evaluation requirement, Aurora College submitted four technical arguments with respect to the well, as well as an argument that complying with the requirement for cement evaluation would be a significant financial burden.

In response to IR 6.2, Aurora College has not submitted additional information that would affect my consideration of its technical arguments with respect to the well. It also has not presented any alternative approaches that would provide the same or greater level of protection for human safety and the environment. Therefore, I reiterate my March 8, 2023, conclusion that Aurora College has not demonstrated that the cement in the Aurora Training Well G-04 (WID1915) meets the requirements of section 56 of the OGDPR.

With respect to Aurora College’s arguments that complying with the cement evaluation requirement is too costly, the additional information provided in response to IR 6.2 and in Aurora College’s July 10, 2023, email reinforces that, despite being aware of its obligation to abandon the well in accordance with the Guidelines since August 2017, Aurora College did not make appropriate financial provisions to carry out this work. While this is unfortunate, it does not change my March 8, 2023, conclusion that Aurora College’s financial limitations are not a reason to exempt it from the regulatory requirements.

Therefore, my decision of March 8, 2023, with respect to Aurora College’s request for an exemption from the requirement to evaluate the cement behind the casing string of the Aurora Training Well G-04 (WID1915) stands.

Sincerely,



Pauline de Jong  
Regulator

- c. Jeff O’Keefe, Vice President, Aurora College  
Glenda Vardy-Dell, President, Aurora College  
Lorne Hammer, Canadian Petroleum Engineering Inc.  
Ron McCosh, Canadian Petroleum Engineering Inc.