



NWT OFFICE OF THE REGULATOR OF OIL AND GAS OPERATIONS

Office of the Regulator of Oil and Gas Operations

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Ryan N. Munro  
Manager Pipeline Abandonment Planning  
Canadian Natural Resources Ltd.  
Suite 2100, 855 – 2 ST SW  
CALGARY AB T2P 4J8

May 9, 2025

Dear Ryan N Munro:

**Information Request No. 1:  
Application for an Operations Authorization (OA-2025-001-CNRL)**

On April 2, 2025, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application from Canadian Natural Resources Ltd. (CNRL) for an Operations Authorization (OA). The OA covers the proposed abandonment of two pipelines from the North Liard P-66 well site to the Liard K-29 well site.

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

Please send your written responses and any associated correspondence to OROGO by email at [oro.go@gov.nt.ca](mailto:oro.go@gov.nt.ca) or through OROGO's secure file transfer site. Please submit your response on or before 4:00 p.m. on May 26, 2025.

If you are unable to respond within this timeframe or have any questions, please contact OROGO at (867) 765-8160 or by email at: [oro.go@gov.nt.ca](mailto:oro.go@gov.nt.ca).

Sincerely,



Pauline de Jong  
Regulator

c. Tara Methuen, CNRL  
Arly Castillo, CNRL

**Canadian National Resource Ltd.**  
**Application for an Operations Authorization (OA-2025-001-CNRL)**  
**Information Request No. 1**

**1.1 Safety Plan**

**Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, Section 11 of the Safety Plan (Appendix E of the application) identifies the National Energy Board as the regulatory authority for oil and gas activities in the Northwest Territories.

This section also refers to the Office of the Regulator of Oil and Gas Operations (OROGO) being an arms length unit within the Department of Industry Tourism and Investment.

As of April 1, 2014, OROGO is the regulatory authority for all oil and gas operations in the Northwest Territories, with the exception of federal lands, inter-provincial territorial pipelines and the Inuvialuit Settlement Region. The scope of the proposed operation is in OROGO's jurisdiction.

OROGO is an arms length unit within the Department of Justice.

The Safety Plan submitted on April 2, 2025, does not meet the requirements of Section 5 of the *Safety Plan Guidelines and Interpretation Notes*. Missing information includes, but is not limited to:

- Mitigation measures related to wildlife encounters such as predator defense;
- Location and availability of a medic during operations;
- Location of health care facilities;
- Contact information for the individuals identified in the organizational structure;
- List of structures facilities and equipment critical to safety; and
- Project Site Safety Plan as referenced in the scope of this submission.

**Request:**

Please submit an updated Safety Plan that includes correct references to the regulatory authorities as well as all information identified in section 5 of the *Safety Plan Guidelines and Interpretation Notes* specific to the proposed operation.

## 1.2 Contingency Plan

### **Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, the Contingency Plan (Appendix G of the application) does not meet the requirements of section 5 of the *Contingency Plan Guidelines and Interpretation Notes*. Missing information includes, but is not limited to:

- Description of the organizational structure for the proposed work or activity, contact information for personnel responsible for implementing the Contingency Plan and their roles in implementing the Contingency Plan; and
- Training and compliance monitoring related to emergency response.

### **Request:**

Please submit an updated Contingency Plan that includes information identified in section 5 of the *Contingency Plan Guidelines and Interpretation Notes* specific to the proposed operation.

## 1.3 Environmental Protection Plan

### **Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, the Environmental Protection Plan (Appendix F of the application) does not meet the requirements of section 5 of the *Environmental Protection Plan Guidelines and Interpretation Notes*. Missing information includes, but is not limited to:

- Description of organizational structure for the proposed work or activity, contact information for personnel responsible for implementing the Environmental Protection Plan and their roles in implementing the Environmental Protection Plan;
- Identification of hazards and evaluation of risks; and
- List of structures, facilities, and equipment critical to protection of the environment.

### **Request:**

Please submit an updated Environmental Protection Plan that includes information identified in section 5 of the *Environmental Protection Plan Guidelines and Interpretation Notes* specific to the proposed operation.

## 1.4 Post-Abandonment Site Closure and Reclamation

### **Preamble:**

CNRL submitted its complete application for OA-2025-001-CNRL on April 2, 2025. On April 11, 2025, OROGO wrote to CNRL to introduce the pilot approach to regulating legacy contamination from oil and gas activities under the *Oil and Gas Operations Act*.

OROGO is currently accepting feedback on the pilot approach and intends to set up one-on-one meetings with affected companies, including CNRL, in the second half of May 2025.

Under the pilot approach, CNRL will be required to obtain an Operations Authorization (OA) for post-abandonment site closure and reclamation activities in the areas affected by the two pipelines from the P-66 wellsite and the wellsite itself. These activities are not scoped into CNRL's application for OA-2025-001-CNRL. CNRL may choose to broaden the scope of OA-2025-001-CNRL to include these activities or obtain a separate OA for these activities once the pipeline abandonments are complete.

### **Request:**

Please submit the following:

- An amended application for OA-2025-001-CNRL that includes information on CNRL's plan to address post-abandonment site closure and reclamation activities for the areas affected by the two pipelines from the P-66 wellsite and the wellsite itself; or
- A deadline by which CNRL intends to submit a new OA application to address post-abandonment site closure and reclamation activities for the areas affected by the two pipelines from the P-66 wellsite and the wellsite itself

## 1.5 Engagement Plan

### **Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, CNRL submitted an Engagement Package (Appendix I of the application). The Engagement Package, including a Draft Engagement Plan, was sent to several Indigenous Governments and Indigenous organizations, as well as to the Hamlet of Fort Liard, on April 1, 2025. CNRL requested feedback from these organizations on the Draft Engagement Plan by April 15, 2025.

### **Request:**

Please provide an update on the status of the Engagement Plan. If the Draft Engagement Plan has been revised based on feedback received, please submit the current version.

## 1.6 Proof of Financial Responsibility

### **Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, under the heading Proof of Financial Responsibility, CNRL makes statements about the company's financial situation and provides a link to its current and historical Financial Statements.

CNRL does not provide any of the information required under the *Proof of Financial Responsibility Guidelines and Interpretation Notes*, including:

- A description of the worst-case scenario that could occur from a spill or debris during the operation (for example, for a spill, identify the maximum possible volume and most damaging form of petroleum);
- A description of any potential impacts of the worst-case scenario on Indigenous and other land use;
- An estimate of the amount of loss or damage that would occur if the spill or debris were not cleaned up to the Regulator's satisfaction, including information on how this estimate was developed and who was involved in its development;
- A description of the costs and expenses that would be incurred by a third party to clean up the worst-case scenario, including:
  - Crew costs;
  - Accommodation costs for the crew, either in a camp, hotel or other facility;
  - Equipment cost to obtain and hire equipment for the removal of contaminated material or other waste;
  - Sampling costs to conduct sampling required to demonstrate that the clean-up has been completed effectively;
  - Transportation and disposal costs to transport the contaminated material or other waste to an approved disposal site and dispose of it;
  - Access costs to access the well site to complete the clean-up. Identify the season of access (summer or winter), the types of access (barge, winter road, etc.), and the length and cost per kilometer of any roads to be constructed; and
  - Indirect costs, including project management, regulatory approvals, financial or administrative, and other relevant costs.

### **Request:**

Please submit a proposed amount of Proof of Financial Responsibility for this Operations Authorization with rationale including the information required under the *Proof of Financial Responsibility Guidelines and Interpretation Notes*.

## **1.7 Benefits Plan**

### **Preamble:**

In the complete application for OA-2025-001-CNRL submitted on April 2, 2025, CNRL submitted a copy of its Benefits Plan submission to the Department of Industry, Tourism, and Investment, made on March 31, 2025 (Appendix C of the application).

An Operations Authorization cannot be issued without confirmation that the Minister of Industry, Tourism, and Investment has approved CNRL's Benefits Plan.

### **Request:**

Please provide an update on the status of the Benefits Plan. If the Benefits Plan has been approved by Minister of Industry, Tourism, and Investment, please submit the approval letter signed by the Minister.