



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

June 9, 2025

Dear Ryan N Munro:

**Information Request No. 2:  
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 response to Information Request No. 1 and requires additional information to complete its review of CNRL's OA application, as set out in the attached Information Request No. 2.

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 June 24, 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. 2**

## **2.1 Proof of Financial Responsibility**

### **Preamble:**

In the response to Information Request No. 1.6, submitted on May 26, 2025, under the heading Proof of Financial Responsibility (PFR), CNRL's proposed worst-case scenario is a spill of fresh water released underground from a pipeline failure. CNRL's associated estimate for PFR is a maximum of \$100,000. CNRL states this amount is "for monitoring of an impacted area to confirm natural vegetation regrowth, with a slight possibility of additional soil management or replanting required."

CNRL's response to Information Request No. 1.6 does not meet the requirements of the *Proof of Financial Responsibility Guidelines and Interpretation Notes* (Guidelines):

- The proposed worst-case scenario is not a spill or debris as defined in section 6 of the Guidelines.
- The proposed amount of PFR is not substantiated by:
  - 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; and
  - A description of the costs and expenses that would be incurred by a third party to clean up the worst-case scenario, including all elements described in section 6 of the Guidelines.

### **Request:**

Please submit a revised proposed amount of Proof of Financial Responsibility for this Operations Authorization, based on a worst-case scenario that meets the definitions of spill and debris in the Guidelines, with rationale including the information required under the Guidelines.