



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

Ken Nikiforuk  
Manager, Completions  
Strategic Oil and Gas Ltd.  
1100, 645 – 7<sup>TH</sup> AVENUE SW  
CALGARY AB T2P 4G8

January 7, 2019

Dear Ken Nikiforuk:

**Information Request No. 1:  
Strategic Oil and Gas Ltd. Application to  
Re-Suspend the Cameron 2H-03 Well (WID 2073) (ACW-2018-015)**

On December 20, 2018, the Office of the Regulator of Oil and Gas Operations (OROGO) received a complete application from Strategic Oil and Gas Ltd. (SOG) to Alter the Condition of a Well (ACW) for the re-suspension of the Cameron 2H-03 well. In order to review SOG's application, OROGO requires additional information, as set out in the attached Information Request No. 1.

Please send your written responses and any associated correspondence to Mr. James Fulford, Chief Conservation Officer, 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 January 14, 2019. If you are unable to respond within this timeframe or have any questions, please contact me at (867)767-9097 Ext: 78003 or by email at [Pauline.dejong@gov.nt.ca](mailto:Pauline.dejong@gov.nt.ca).

Sincerely,

Pauline de Jong  
Senior Advisor, Legislation and Policy

**Attachment**

- c. Michael Bolianatz, Regulatory Compliance Officer, Strategic Oil and Gas Ltd.

Bureau de l'organisme de réglementation des opérations pétrolières et gazières

B.P. 1320, Yellowknife, TNO X1A 2L9

Tél : 867-767-9097 • Téléc : 867-920-0798 • Site web : [www.oro.go.gov.nt.ca](http://www.oro.go.gov.nt.ca)

Adresse de messagerie : 4<sup>e</sup> étage, 5201 – 50<sup>e</sup> Avenue, Yellowknife TNO X1A 3S9

BUREAU DE L'ORGANISME DE RÉGLEMENTATION DES OPÉRATIONS PÉTROLIÈRES ET GAZIÈRES DISTNO

**Strategic Oil and Gas Ltd. (SOG)**  
**Application to Alter the Condition of a Well (ACW-2018-015)**  
**Information Request No. 1**

### **1.1 Abandonment of Perforated Zones**

**Preamble:** The ACW application for the Cameron 2H-03 well proposes the use of a "One step Abandonment Procedure", whereby cement is poured down the tubing to place 15 linear metres of cement on top of permanent bridge plugs.

This proposed methodology does not meet the well abandonment standards set out in Section 6 of OROGO's *Well Suspension and Abandonment Guidelines and Interpretation Notes (Guidelines)* which requires the use of circulated cement to abandon perforated zones.

**Request:** Please submit an updated well program that meets the well abandonment standards set out in Section 6 of the Guidelines, which requires the use of circulated cement to abandon perforated zones.

### **1.2 Detailed Description of Procedure**

**Preamble:** The information provided in the Procedure section of the ACW application does not provide sufficient detail to meet the requirements of section 12a) of the *Oil and Gas Drilling and Production Regulations (OGDPR)*. The well operations plan is required to describe all steps in the well abandonment and or suspension process in sufficient detail to assess the safety, regulatory compliance and technical proficiency of proposed operations.

Areas where the information provided is not sufficient include (but are not limited to):

- Determination of SCVF/Gas Migration. For example, bubble test procedure, ensuring the well is not frozen, monitoring for LEL, potential H<sub>2</sub>S levels, evidence of gas migration at surface (i.e. historical inspection records) and identification and repair of possible vent flows;
- Steps to ensure that the well is dead by conducting and recording SICP and SITP. Determination of weight and composition of required kill fluid that will be on location.
- Identifying procedures for bleeding off any wellhead pressures (i.e. bleeding off the well to a rig tank, pipeline and/or flaring);
- Procedures for conducting the wellhead to Blow Out Preventer connection (i.e. install landing pup joint with an open stabbing valve);

- Pressure tests to be conducted and recorded (i.e. wellhead to BOP connection, the circulating pressure lines, rig manifold and BOP pressure tests);
- Accumulator function test procedures, including accumulator recharge and closing times for each of the BOP components;
- Conducting and recording blowout prevention and safety drills;
- Ensuring all necessary safety equipment is strategically positioned on site and tested to ensure proper operating condition prior to commencing well abandonment or suspension operations; and
- Install and secure the wellhead at the end of operations for zonal abandonments and suspensions.

**Request:** Please provide an amended ACW application that meets the requirements of section 12a) of the OGDPR by providing sufficient detail on the planned procedures.

### **1.3 Well Suspension Requirements**

**Preamble:** The ACW application for the Cameron 2H-03 well does not meet the requirements of Section 5B of the *Well Suspension and Abandonment Guidelines and Interpretation Notes (Guidelines)*, which requires a suspended wellbore to be filled with corrosion-inhibiting fluid and the use of non-freezing liquid within the permafrost zone.

**Request:** Please submit an updated well program that meets the requirements of Section 5B of the Guidelines, which requires a suspended wellbore to be filled with corrosion-inhibiting fluid and the use of non-freezing liquid within the permafrost zone.

### **1.4 Clarification of Planned Suspension and Abandonment Activities**

**Preamble:** The ACW application for the Cameron 2H-03 well proposes to leave the well in a suspended state.

Section 12c) of the OGDPR requires that an application to suspend a well, or part of a well, include an indication of the period within which the suspended well will be abandoned or completed.

**Request:** Please provide an amended ACW application that meets the requirements of section 12c) of the OGDPR by indicating the period within which the suspended well will be abandoned or completed.

**If SOG does not plan to eventually abandon the well, please provide a rationale for the use of circulated cement plugs for zonal isolation versus the use of down-hole suspension techniques as described in Section 5B of the Guidelines.**



FROM  
 STREET ADDRESS (P.O. BOX NOT ACCEPTABLE)  
 CITY  
 POSTAL CODE  
 TELEPHONE NUMBER

TO  
 STREET ADDRESS (P.O. BOX NOT ACCEPTABLE)  
 CITY  
 POSTAL CODE  
 TELEPHONE NUMBER

DESCRIPTION OF ITEMS  
 SPECIAL INSTRUCTIONS  
 PICK-UP COURIER  
 TIME AM PM  
 YR MO DAY  
 NO. PKGS (SEE) WT SUBJECT TO CONNECTION  
 Kg Lbs  
 DECLARED VALUE \$  
 INTERLINE/CUSTOMER REFERENCE NO.  
 SHIPPER  
 X SIGNATURE  
 PLEASE PRINT NAME  
 CARRIAGE SUBJECT TO THE FOLLOWING CONDITIONS IN ADDITION TO THOSE ON BACK  
 1 CARRIER WILL NOT BE RESPONSIBLE FOR FAILURE TO PERFORM OR COSTS INCURRED FOR DELAY IN SHIPPING  
 2 UNLESS SPECIFICALLY ADVISED IN WRITING CARRIER IS LIMITED TO RESTRICTED LIABILITY AS DESCRIBED ON REVERSE SIDE OF THIS BILL  
 WARNING - ALL DANGEROUS GOODS MUST BE DISCLOSED TO THE CARRIER. SEE REVERSE SIDE

COURIER TARIFF	CUSTOMER NO.
INTER. LATE ADVANCE	
DECLARED VALUE CHANGE	
OTHER	
G.S.T.	
<b>TOTAL</b>	<b>IMPORTANT SEE REVERSE</b>

BUFALO PARCEL COURIER SERVICES LTD., 1000 BUFFALO DRIVE, HAY RIVER, N.W.T. X0E 0R6  
 PHONE: EDMONTON (786) 455-9283 HAY RIVER (867) 874-3307  
 CALGARY (403) 271-3887 YELLOWKNIFE (867) 873-2084  
 GST # 100686785RT0001 TOLL FREE 1 800 485 3188

**B 1360982**

PREPAID  COLLECT

BILL OF LADING FOR NON-NEGOTIABLE SHIPMENTS

5 SHIPPERS COPY