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April 28, 2025

Sahtu Land and Water Board
Box 1
Fort Good Hope NT
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Attention: Natalie Lippa, Regulatory Specialist

Email: natalie.lippa@slwb.com

**Re: Land Use Permit S22A-001 and Water Licence S22L1-001,
Project Schedule and Activities Description Status Update and Conditions Satisfaction for Tweed Lake M-47,
Tweed Lake A-67, and Bele O-35 Wells. Abandonment & Reclamation Program, Colville Lake Area, Sahtu Region, NT (the
"Project")**

Dear Natalie,

As a follow-up to our meetings on February 11 and April 23, 2025 for the Program covered by S22A-001/S22L1-001, Suncor Energy Inc. ("Suncor") is submitting this letter to the Board with an update on the status of the schedule, project activities, and to confirm that the proposed well abandonment activity will operate within and satisfy the original Land Use Permit (LUP) and Water Licence (WL) S22A-001/S22L1-001¹ conditions approved in 2022.

No changes are proposed to the scope of the Project, as described in LUP S22A-001 which expires August 21, 2027. All activities, proposed environmental protection and mitigation measures were fully described in the original LUP and WL Application, remain applicable and should, therefore, be exempt from preliminary screening.

This letter includes the following information:

- The rationale for submitting this letter;
- Regulatory direction (from OROGO) driving this phase of the Project;
- A summary of the Project status within the current LUP and WL;
- Annual update of the Environmental Protection Plan (the "EPP");
- Annual update of the Engagement Plan and Record of Engagement;
- Updated equivalent Equipment List; and
- Annual update of the Waste Management Plan (the "WMP").

Rationale

After the LUP and WL were issued in 2022, Suncor proposed to conduct well abandonment activities starting in the spring of 2025 using helicopter-portable equipment. The alternative to helicopter access

¹ [Suncor Energy Inc. - S22L1-001 | Sahtu Land and Water Board](#)

was the construction of approximately 80 kilometres (km) of winter access roads. After efficient and successful helicopter-supported downhole and surface abandonment operations at Tathlina N-18 (in the South Slave Region) Suncor is proposing to conduct similar operations for the three-well abandonment program in the Colville Lake Area. This proposed scope reduction, with associated reduction in land and water impacts, was approved by the Office of the Regulator of Oil and Gas Operations (OROGO).

The original approved Project schedule outlined a series of phased activities with site work occurring in throughout the calendar year. The current Project description provides that helicopters or fixed-wing aircrafts may be used for movement of equipment. The purpose of the well abandonment project remains, the schedule and activities associated with an equivalent type of abandonment rig that is now heli-portable within a narrower operating window meets the original intent of abandonment. Suncor has prepared a concordance table (below) of Project Aspects in accordance with the *Mackenzie Valley Resource Management Act (MVRMA)*.

PROJECT ASPECTS – CONCORDANCE TABLE

Project Aspect	Comments / Updates	Location in 2022 LUP/WL Application	Location in this letter
OROGO Regulatory Requirements	Direction to complete the downhole abandonment work of the suspended wells by August 31, 2025.	N/A	Section 1 (letter) Attachment 1.
Project status of proposed activities for the execution plan.	The purpose of the well abandonment project remains, the schedule and activities associated with an alternative type of rig (heli-portable) have been updated.	N/A	Section 2 (letter)
Preliminary Screening	The updated schedule and well abandonment activities will adhere to the Proposed Environmental Protection and Mitigation Measures evaluated in the Preliminary Screening.	N/A	Section 3 (letter)
Environmental Protection Plan	Annual update provided.	Appendix 1	Section 4 (letter) Attachment 2.
Engagement Plan and Record	Annual update provided.	Appendix 1-B	Section 5 (letter) Attachment 3.
Waste Management Plan	Annual update provided.	Appendix 6	Section 6 (letter) Attachment 4.
Equipment List	Update of equivalent abandonment rig provided	Appendix 4	Section 7 (letter) Attachment 5.
Land Use Conformity	The helicopter supported well abandonment operations meet the 19 Conformity Requirements of the Sahtu Land Use Plan.	Appendix 1, S.7.3	Section 8 (letter) Attachment 6
Closure and Reclamation Plan	The Interim plan is considered a living document. The focus of the 2025 activities is the downhole well abandonment. The closure and reclamation of other project components (i.e. sumps) will be captured in an updated plan following further site assessment in 2025.	Supplemental information to support project status remains within permit terms and conditions.	Section 9 (letter)
Land Use Permit and Water Licence	The updated schedule and activities can be conducted within the current terms and conditions of the Land Use Permit and Water License.	N/A	Section 10 (letter)
Closure Costs	Closure costs are anticipated to be considerably lower than originally projected with the reduced footprint of a heli-portable assisted well abandonment. Conditions are satisfied.	N/A	Section 11 (letter)

1. Compliance with Office of the Regulator of Oil and Gas Operations (OROGO Direction)

In the December 2, 2024 Direction Letter, OROGO directed Suncor to complete the abandonment operations for the Tweed Lake A-67, Tweed Lake M-47, and Bele O-35 wells by August 31, 2025 (Attachment 1). Authorization for the operation was issued on March 24, 2025 (Attachment 1).

2. Project Status

The Project described in the approved program for well abandonment activities included the mobilization of equipment (by either helicopter, fixed-wing aircrafts and/or winter road), downhole abandonment, surface casing vent flow (SCVF) testing, and surface abandonment (including minor reclamation activities). These activities will be conducted in accordance with the selected closure criteria as presented in the document entitled *Well Suspension and Abandonment Guidelines and Interpretation Notes* by OROGO (2022).

As discussed in the February 11 and April 23, 2025, meetings, closure and reclamation activities previously described in the Interim CRP that are applicable to Project components other than the wellhead area (e.g., sumps) will be presented in the Sump Remediation and Restoration Plan (the "SRRP"). In addition to the closure activities described within this submission, additional field data required to support the forthcoming SRRP will be collected during the proposed Q2 2025 program, which drives the timing of the SSRP submission.

Suncor mobilized supporting equipment in February/March 2025 for abandonment operations in accordance with the *Well Suspension and Abandonment Guidelines* from OROGO. Suncor has also obtained the required Land Use Permit for these wells (SS22A-001). Whereas the abandonment activities were originally contemplated as a winter operation, the existing permit included helicopter-supported activities (see Attachment 4 Updated Equivalent Equipment List).

Well abandonment will be completed in accordance with the Alter Condition of Wells (ACW) programs approved by OROGO on January 17, 2025. OROGO directed that Suncor's proposed activities were to be conducted safely, without waste and without pollution in compliance with the *Oil and Gas Drilling Production Regulations*.

The following is a list of planned closure activities that are expected to occur from winter of 2025 to 2026 based on the current OROGO-approved well abandonment execution plan:

- Winter 2025:
 - Mobilization of helicopter-portable equipment to Colville Lake, NT via truck.
- May/June 2025:
 - Heli-portable abandonment operations begin early May for approximately 30 to 40 days;
 - Mobilization of helicopter-portable equipment to wellsites via helicopter;
 - Well abandonment activities:
 - Store inhibited wellbore fluids in totes with secondary containment for future winter transportation in the laydown yard in Colville Lake (agreement in place);
 - Surface casing cutting and sign installation; and
 - Demobilization of equipment and waste.
 - Evaluation of background conditions to support Suncor's revegetation strategy; and
 - Collection of any remaining field data required to support the SRRP.
- February 2026:
 - Transportation of inhibited fluids from Colville Lake to approved location.

3. Preliminary Screening

Proposed Environmental Protection and Mitigation Measures that were evaluated in the Preliminary Screening will be adhered to during the planned downhole abandonment work.

The benefits of May/June helicopter-supported abandonment include:

- significant decrease in water use, fuel use, and fuel storage requirements;

- eliminate winter road wildlife encounters/mortality;
- reduced footprint through this phase of the operation; and
- reduced length of time required for abandonment operations (anticipated 30 days vs. 3 months).

OROGO has noted that the activities originally proposed under OA-2021-003-SUN were subject to preliminary screening by the Sahtu Land and Water Board under Land Use Permit S22A-001. In its March 24, 2025 decision OROGO adopted the preliminary screening determination for S22A-001 and advised the Mackenzie Valley Environmental Impact Review Board of this determination on October 6, 2022, and that the proposed variation did not change the scope of the Project (Attachment 1).

4. Environmental Protection Plan (Annual Update)

An abandonment plan description and timeline with an updated anticipated program schedule has been provided. No new land areas will be required for the spring abandonment. The potential environmental impacts and proposed mitigations have been detailed in the Environmental Protection Plan (Attachment 2). Scheduled downhole abandonment activities will comply with the terms and conditions of the current LUP S22A-001 and WL S22L-001. While Suncor has provided an Annual Update to the EPP, the activities scheduled for May 15, 2025 execution are covered under Suncor’s current LUP S22A-001.

5. Engagement Plan and Record (Annual Update)

Suncor continues to operate under its approved Engagement Plan. There have been no changes to the plan that would require an amendment. An annual update has been provided with an up-to-date engagement log. Updates are limited to changes to contact information (Attachment 3). Engagement is ongoing for the Project.

The OA received by OROGO also notes that Suncor has conducted consultation and engagement activities, and that Suncor has demonstrated continued engagement with these organizations. The proposed activities are intended to reduce impact on existing or asserted First Nations’ rights by abandoning the three wells. Considering the nature and scale of the activity and the concerns raised, consultation undertaken by Suncor on the activities proposed under this variation to OA-2021-003-SUN is adequate (Attachment 1).

6. Waste Management Plan (Annual Update)

An annual update for the Waste Management Plan (the “WMP”) has been provided (Attachment 4). The downhole well abandonment activities scheduled for May 15, 2025, execution are covered under Suncor’s current LUP and satisfies Condition 43 of the LUP and Condition 4 of the WL.

OROGO has noted in its January 17, 2025 Decision that, after review of Suncor’s description of the proposed heli-portable activity, it found that the proposal demonstrates that this activity will be conducted safely, without waste and without pollution in compliance with the Oil and Gas Drilling and Production Regulations (Attachment 1).

7. Equipment List

Suncor has provided an update of equivalent anticipated equipment. The current Project description stated that helicopters or fixed-wing aircrafts may be used for movement of equipment. The heli-portable wireline unit is considered a lighter equivalent type of abandonment rig (Attachment 5).

8. Land Use Plan Conformity

As outlined in the EPP, the current operations meet the 19 Conformity Requirements of the Sahtu Land Use Plan (Attachment 6). This conformity was further confirmed in OROGO’s OA, which also states that it

considered the conformity with the SLWB Land Use Plan when issuing OA-2021-003-SUN. The proposed variation does not affect the conformity with the Sahtu Land Use Plan (Attachment 1 and 6).

9. Closure and Reclamation Plan

As discussed in the February 11, 2025, meeting, a separate Closure and Reclamation Plan should not be required for the well abandonment activities being completed under the approval and jurisdiction of OROGO. As such, Suncor's Closure and Reclamation Plan will continue to be developed and is considered to be a living document with a future revision to include updated information and reduced risk considerations as a result of the 2025 well abandonment and site assessment activities. The plan may be updated once the sumps are further assessed, and any other remediation/reclamation requirements have been identified.

The 2025 Project activities focus solely on closure activities at the wellhead areas of each wellsite in the Project area including well abandonment, and minor surface reclamation. It does not include closure activities in respect of other Project components such as the associated drilling sumps. Remediation and reclamation of other Project components will be included in the forthcoming SRRP.

Since the 2022 Interim CRP was submitted and the WL and LUP were issued, the following has occurred:

- Field scouting for water sources and other environmental data was conducted;
- A laydown yard was arranged in Colville Lake, NT;
- Pressure, SCVF, and GM testing were completed in August 2024. No issues were identified;
- Operational changes were submitted by Suncor in an execution plan submitted and approved by OROGO. The updated well abandonment closure activities allow for activities to occur during the spring/summer using equipment transportable by helicopter rather than constructing approximately 80 km of winter access road; and
- Site Conditions Surveys and Environmental Assessments were started at all three wellsites in 2024 and are to be completed with subsequent assessments in 2025.

Condition 76 of the LUP is presently satisfied as there are no plans for sump remediation or restoration at the time of well abandonment activities. A Sump Remediation and Restoration Plan and accompanied plans (as required) will be submitted following 2025 assessments and greater than 90 days prior to commencement of that land-use operation.

10. Land Use Permit and Water Licence Definition(s) and/or Condition(s), Related to Well Abandonment Activity Description.

The timing of well abandonment activities is intended to align with the current terms and conditions of the permit, rather than the originally considered winter downhole abandonment program. This schedule eliminated the requirement for winter access construction and reduced the time required to conduct downhole and surface abandonment while satisfying the current terms and conditions of the LUP and WL.

Suncor understands that the well abandonment phase of approved activities will be operating in Q2 of 2025 rather than Q1, but that all of the conditions of the LUP and WL will still be satisfied. In this regard, the following conditions will be satisfied with a modified control :

- LUP Condition 13 - The helicopter supported well abandonment will require use of only a fraction of the equipment on the approved anticipated heavy equipment list. The heli-portable wireline rig is a lighter equivalent to the wireline unit approved.
- LUP Condition 20 - Is presently satisfied as the helicopter supported well abandonment will not expose permafrost during the activity and shall be satisfied prior to a future winter operation (if required).

- LUP Condition 24 - Is presently satisfied as the helicopter supported well abandonment is focused at the wellhead only and shall be satisfied prior to a future winter operation (if required).
- LUP Condition 40 - Is presently satisfied as the helicopter supported well abandonment activity will not occur as a winter operation and Wildlife Monitors will be onsite during operations and perform sweeps immediately prior to the well abandonment activity (within 1 to 2 weeks). Under the current LUP Suncor will also be satisfying condition 75 as nest sweeps will also be completed pre-activity and Wildlife Monitors will be onsite during the well abandonment operation.
- WL Condition 1 - Is presently satisfied as Suncor will not be withdrawing any water for the approved winter road construction for the well abandonment activity. Water usage for the well abandonment activity is below the threshold to trigger the need for a WL and is being sourced from within an approved municipal source.

11. Security Deposit


Closure costs are anticipated to be considerably lower than originally projected as a result of a reduced footprint of a heli-portable abandonment. Suncor intends to provide an updated closure cost estimate prior to starting the subsequent phases of abandonment activities. In this regard, Condition 49 of the LUP has been satisfied.

Closure

The intent of this submission is to provide supporting information related to the well abandonment activity description to the LUP and WL and confirms that Suncor’s planned downhole well abandonment falls within its current LUP and satisfies all conditions therein. The information provided demonstrates that Suncor does not require an amendment to complete this phase of work.

We trust that the updated status of schedule and Project activity description will satisfy your current requirements and will provide suitable documentation for your records to allow for confirmation to proceed with downhole abandonment work starting on May 15, 2025. If you have any further questions or concerns, please do not hesitate to contact us.

Thank you,

DocuSigned by:

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- ATTACHMENT 1: OROGO REGULATORY DIRECTION
- ATTACHMENT 2: EPP ANNUAL UPDATE
- ATTACHMENT 3: ENGAGEMENT PLAN AND RECORD ANNUAL UPDATE
- ATTACHMENT 4: UPDATED EQUIVALENT EQUIPMENT LIST
- ATTACHMENT 5: WMP V.1.1 ANNUAL UPDATE
- ATTACHMENT 6: SAHTU LAND USE PLAN CONFORMITY TABLE