

March 17, 2020

By Email Only

Ryan and Avery Sales

**Statement of Concern No. 31655
Canadian Natural Resources Limited (CNRL)
Applications No. 1686733, 1925466**

Dear Ryan and Avery Sales:

You are receiving this letter because you filed a statement of concern (SOC) about Applications No. 1686733 and 1925466. During the application process and to address your concerns with regard to the access road location, CNRL filed with the Alberta Energy Regulator (AER) a new survey plan that proposes a new location for the access road. Due to system limitations, CNRL was not able to update its original application with the new survey plan. As a result, on March 10, 2020, the AER requested that CNRL resubmit its well licence application to include the new survey plan. The new application was submitted on March 11, 2020 and AER system generated a new application number Application No. 1812904. Please note that your SOC (SOC No. 31655) also applies to the new application and that the AER file number for the SOC you submitted has not changed. The AER has reviewed your SOC, along with all related correspondence, including the updated survey plan, applicable requirements and other submissions or information about the applications. The AER has decided that a hearing is not required to consider the concerns outlined in your SOC.

In our review of your concerns, we considered the following:

- Regarding your concerns around your development permit, public safety and clubroot, relate to using the same shared approach, CNRL has updated its survey plan which shows that it has moved the approach and access 106 metres east from the quarter line. With the relocation of the approach and access road, there will be no overlapping usage with CNRL.
- Your concerns around dust do not fall to the jurisdiction of the AER, and should be addressed by the province or the municipality, as applicable. In addition, CNRL has committed to its vehicles driving at speeds which will reduce the amount of dust on

the roads, as well as utilizing additional mitigative measures should dust become an issue.

Based on the above, the AER has concluded that it is not necessary to hold a hearing before making a decision on the applications. The AER has issued the applied-for licences and this is your notice of that decision. Copies of the licences are attached.

All AER-regulated parties must comply not only with the conditions of their authorizations, but with all of the AER's regulatory requirements. To ensure industry compliance the AER has developed its *Integrated Compliance Assurance Framework*, which embodies the three main components of all effective compliance assurance programs, those being education, prevention, and enforcement. You can find out more about how the AER verifies industry compliance and responds to noncompliance here: <https://aer.ca/regulating-development/compliance/compliance-assurance-program>.

You may file a regulatory appeal on the AER's decision to issue the licences if you meet the criteria within section 36 of the *Responsible Energy Development Act*. Filing instructions and forms are located here: <https://www.aer.ca/regulating-development/project-application/regulatory-appeal-process>.

If you have any questions please contact SOC@aer.ca.

Sincerely,

<Original signed by>

Lane Peterson
Director, Oil and Gas Surface
Regulatory Applications
/yc

Enclosures (5): **Licences**

cc: Vovel Gapaz, Canadian Natural Resources Limited
Cameron LaRose, Canadian Natural Resources Limited
SOC Assessor, AER
Bonnyville Field Centre, AER