

September 10, 2020

[www.aer.ca](http://www.aer.ca)

By Email Only

Betty Ettinger

**Statement of Concern No. 31677  
Canadian Natural Resources Limited  
Application No. 1709075**

Dear Ms. Ettinger:

You are receiving this letter because you filed a statement of concern (SOC) about Application No. 1709075. The Alberta Energy Regulator (AER) has reviewed your SOC, along with the application, and all applicable requirements and other submissions or information about the application. 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:

- A Detailed Site Assessment (DSA) was conducted by Hemisphere Land & Resource Consulting Ltd. on October 3, 2019, for the vegetation, landscape and soil. The DSA showed that the conditions of the vegetation, landscape and soil were comparable both onsite and offsite. The DSA indicated that all parameters of the *2010 Reclamation criteria for Wellsites and Associated Facilities for Cultivated Lands* (Reclamation Criteria) were met.
- AER staff conducted a site inspection on July 17, 2020 and your concerns regarding quack grass were considered. The site inspection examined the vegetation and no concerns were noted on the site applied for.
- As per confirmation from the July 17, 2020 AER site visit, it was noted that your concerns relate to a well located at 103/08-08-038-17W4M (103 well) and not the 102/08-08-038-17W4M site for which the reclamation certificate application has been applied for. The concerns are outside the scope of the current application and will be addressed as necessary at the time of submission for the 103 well application.
- CNRL has committed to working with you to mitigate concerns regarding quack grass.

- The Reclamation Criteria are applied to evaluate whether “a site has met equivalent land capability.” Given the findings made in the DSA and during the AER staff site visit, the AER is satisfied that the site has met equivalent land capability and that your concerns have been addressed.

Based on the above, the AER has concluded that it is not necessary to hold a hearing before making a decision on the application. The AER has issued the applied-for reclamation certificate and this is your notice of that decision. A copy of the reclamation certificate is 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 reclamation certificate 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](mailto:SOC@aer.ca).

Sincerely,

<Original signed by>

Andrew MacPherson  
Director, In Situ  
Regulator Applications  
/as

Attachment (1): Reclamation Certificate

cc: Felix Lin, Canadian Natural Resources Limited  
SOC Inbox, AER  
Brad Dunkle, Reclamation Assessor, AER  
AER Red Deer Field Centre, AER