

BY EMAIL ONLY

January 28, 2019

Robert B. Hoolahan, Alexander D. Hoolahan, and Colleen L. Hoolahan

CANADIAN NATURAL RESOURCES LIMITED

APPLICATIONS NO. 1913835, 1913836

STATEMENT OF CONCERN NO. 31349

Dear Robert, Alexander, and Colleen Hoolahan:

You are receiving this letter because you filed a statement of concern about Applications No. 1913835, 1913836. The Alberta Energy Regulator (AER) has reviewed your statement of concern, along with the company's applications, and all 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 statement of concern.

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

- The proposed pad site and facility are not located on your lands, and are about 0.27km east from the boundary of your property, approximately 0.47km from Robert and Colleen's residence and approximately 0.33km from Alexander's residence. The landowner of the proposed pad site and facility has provided consent to Canadian Natural Resources Limited (CNRL).
- CNRL completed a Noise Impact Assessment for the development site. This was confirmed to be satisfactory and in compliance with *Directive 038: Noise Control* by an AER subject matter expert.
- Your concerns about traffic volumes are outside the jurisdiction of the AER, and should be addressed with the M.D. of Bonnyville or Alberta Transportation, as applicable. CNRL has mitigated traffic concerns by reducing traffic during normal operations, with only a small addition of traffic expected – typically a fluid hauling truck once or twice a day. Heavy equipment will be mobilized during construction and drilling.

- CNRL has committed to testing water wells within a 500m radius of proposed developments as part of their policy, and to be performed by an independent contractor. The AER expects CNRL to test your water wells as committed to in their response.
- Your concerns about water flow issues from previous operations are not specific to these applications. CNRL is actively working with the M.D. of Bonnyville to research other alternatives for water removal on the pad located at 15-17-60-4 W4 to ensure this does not occur in the future. If you believe that CNRL is not complying with a regulatory requirement under the jurisdiction of the AER, you may contact Alberta EDGE (Environmental and Dangerous Goods Emergencies) at 1-800-222-6514 to make a complaint.
- Your concerns about environmental damage from CNRL operations whereby brush piles that were not cleared properly and ignited, occurred approximately 20 years ago and are not specific to these applications.

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 licenses and this is your notice of that decision. Copies of the licenses 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 licenses if you meet the criteria within section 36 of the *Responsible Energy Development Act*. Filing instructions and forms are on our website under Regulatory Appeal Process.

If you have any questions, contact Silken Leach at 403-355-4032 or silken.leach@aer.ca.

Sincerely,

<Original signed by>

Rob Cruickshank
Director, Business Process

Attachments: 3 Well Licenses, 1 Facility License

cc: Arly Castillo, Canadian Natural Resources Limited
AER SOC
AER Bonnyville Field Centre