

BY EMAIL ONLY

July 23, 2019

Darcy Younghans

**CANADIAN NATURAL RESOURCES LIMITED (CNRL)**

**APPLICATION NO. 1918784**

**STATEMENT OF CONCERN NO. 31459**

Dear Darcy Younghans:

You are receiving this letter because you filed a statement of concern about Application No. 1918784. The Alberta Energy Regulator (AER) has reviewed your statement of concern, along with the company's application, 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 subject application is for an amendment to CNRL's Primary Recovery Scheme Approval No. 9415, to allow CNRL to increase the subsurface well density in the proposed project locations from the standard prescribed in the *Oil and Gas Conservation Rules*. The amendment would not authorize any drilling or surface activities. The majority of your concerns pertain to drilling and surface activities and are, therefore, outside the scope of this application.
- Specifically, your concerns regarding run off, well locations, chemicals used during drilling, impacts to ecosystems, noise, spills, and emissions are all outside the scope of the current application. These concerns can be raised and considered when CNRL files its *Directive 056: Energy Development Applications and Schedules (D056)* application.
- AER staff are satisfied that the proposed increased well density will not adversely affect local waterbodies.
- Further, your concerns around impacts to groundwater and your water well are addressed by *Directive 008: Surface Casing Depth Requirements* which states that surface casing be

set and cemented to a depth that is intended to protect the deepest aquifer. CNRL must comply with AER requirements that are protective of groundwater sources. CNRL has also committed to offer water well testing within 500 metres of its proposed surface well pad site.

- Your concerns about enjoyment of the Lake are general in nature. You have not demonstrated how your enjoyment of the Lake would be directly and adversely affected by approval of this application.
- Your concerns regarding traffic are outside the jurisdiction of the AER and should be directed to the appropriate authority (Alberta Transportation or the municipality).
- Your concern about reclamation is outside the scope of the current application. Operators are required to reclaim specified land pursuant to Part 6 of the *Environmental Protection and Enhancement Act*. Any concerns you may have with reclamation can be raised and considered when CNRL applies for a reclamation certificate after it has reclaimed the site.

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 approval and this is your notice of that decision. A copy of the approval 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 approval 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 Yvonne Chow at [Yvonne.Chow@aer.ca](mailto:Yvonne.Chow@aer.ca).

Sincerely,

<Original Signed By>

Lane Peterson  
Director, Oil and Gas Surface Authorizations

Enclosure: Approval (1)

cc: Glenn Sando, Canadian Natural Resources Limited  
AER SOC Assessor  
AER Bonnyville Field Centre