

AER Proceeding 427

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July 21, 2023

www.aer.ca

By email only

Blake, Cassels & Graydon LLP

Attention: Lars Olthafer

**Re: Application No. 1942541
Interim Suspension of Clause 7(b) of Class Ib Disposal Approval No. 13122B**

Dear Mr. Olthafer:

As the presiding member of the panel of Alberta Energy Regulator (AER) hearing commissioners presiding over Proceeding 427 (panel), I write regarding the deadline for the installation of additional monitoring wells required in clause 7(b) of Class Ib Disposal Approval No. 13122B issued to Greenfire Resources Operating Corporation (Greenfire) on July 21, 2022 (Approval).

AER Proceeding 427 includes the hearing of Reconsideration 1943570 and the hearing of Greenfire's Application No. 1942541 (Application). The Approval is the subject of Reconsideration 1943570. The panel's final decision on Reconsideration 1943570 will confirm, vary, suspend or revoke the Approval. The Application requests an amendment to the Approval to rescind clause 7(b).

Clause 7(b) requires:

- 7) The Operator must implement the applicable Grand Rapids Aquifer Monitoring, Mitigation, and Response Plans, for each well in Table 1, which includes, but is not limited to:

...

- b) within one year of commencement of disposal, installation of additional monitoring wells in the lowermost Grand Rapids Aquifer at the following approximate locations:

- i) Latitude: 56.289209, Longitude: -111.651185
 - ii) Latitude: 56.264475, Longitude: -111.613973
 - iii) Latitude: 56.326477, Longitude: -111.652970
 - iv) Latitude: 56.317344, Longitude: -111.658715
- [footnotes omitted]

As set out in a letter of the panel issued to Greenfire on July 20, 2023, the one-year deadline in respect of the monitoring wells at the approximate locations set out in clause 7(b)(i) and (ii) of the Approval is August 3, 2023, and one-year deadline in respect of the monitoring wells at the approximate locations set out in clause 7(b)(iii) and (iv) of the Approval is July 23, 2023.

Given that the public hearing on Proceeding 427 is scheduled to commence October 16, 2023, and that a decision on Proceeding 427 will not be issued until after the hearing has closed, the panel advised Greenfire that it was prepared to put in place an interim suspension of the above one-year deadlines pending the issuance of our decision on Proceeding 427, subject to confirmation from Greenfire that this suspension is required.

On July 21, 2023, Greenfire confirmed that the interim suspension is required.

Therefore, the requirement to, within one year of commencement of disposal, install additional monitoring wells as set out in clause 7(b) of the Approval is suspended, pending the issuance of the decision on Proceeding 427.

Yours truly,

Alex Bolton
Presiding Hearing Commissioner

cc: Jeremy Barretto and Liv Desaulniers, Cassels Brock & Blackwell LLP
Heather Sampson, Canadian Natural Resources Limited
Aron Mansell and John Charuk, Greenfire Resources Operating Corporation
Barbara Kapel Holden and Lindsey Mosher, AER Legal Counsel
Andrew Lung, AER Hearing Services