



Calgary Head Office

📍 Suite 1000, 250 – 5 Street SW
Calgary, Alberta T2P 0R4

tel 403-297-8311

aer.ca

October 15, 2026

By email only: Erich.Stilling@shell.com

Erich Stilling
Shell Canada Energy (Shell)

Statement of Concern No. 33081
Enbridge Wabamun Hub Ltd. (Enbridge)
Application No. 1961024

Dear Erich Stilling,

You are receiving this letter because you filed a statement of concern (SOC) about Application No. 1961024. 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:

Enbridge has applied for approval of a carbon dioxide sequestration scheme for the purpose of permanently storing and trapping carbon dioxide captured from third party producers in the Basal Cambrian Sandstone geological formation. This is an optional pre-drill application, not an application for authorization to inject.

- Your concerns are based on future injection activities, which are beyond the scope of the current application. Although the subject application contemplates injection for sequestration purposes, an additional post-drill application under Directive 065: Resources Applications for Oil and Gas Reservoirs (Directive 065) is required to authorize the commencement of injection activities. Enbridge is required to submit the well penetration data when it becomes available as part of that application. All applications, when received, have a public notice posted on the AER's website and are available for viewing on the AER's Public Notification of Tool. On each public notice, the deadline for filing Statements of Concern is indicated.
- You raised concerns in regard to the reported Modular Formation Dynamics Tester (MDT) pressure measurement taken at the 00/08-19-059-20W4 well in September 2010 which may lead to containment risks in legacy wells within the Quest Carbon Sequestration Lease Agreement (CSLA) area. More specifically, your concern is that the measurement resulted in a pressure that is close to 1700 – 1900 kPa higher than would be predicted based on the historical fluid injection in the area of Shell Quest

operations. In a response dated June 8, 2026, Enbridge stated “Accordingly, Enbridge does not accept that the MDT formation pressure at the 8-19 location is or is not elevated by the magnitude asserted in the SOC. The 8-19 MDT pressure is a near wellbore data point and is not, by itself, a “stabilized shut in reservoir pressure survey.” Enbridge further noted its commitment to collecting additional pressure data from the proposed injection wells following drilling and completion, updating the reservoir model and Area of Review / Area of Influence boundaries as operational and monitoring data become available.

- Stabilized shut-in pressure measurements are required to be completed at each of the 3 planned injection wells as per *Directive 040: Pressure and Deliverability Testing Oil and Gas Wells* (condition 3(d) of Approval No. 13575). This data and the associated pressure transit analysis must be included in the *Directive 065* post-drill application.
- Shell indicates that it has been in constructive dialogue with Enbridge and requests that the AER continue to require Shell and Enbridge to work collaboratively to determine if pressure issues from the 8-19 well will cause containment loss risk to the legacy wells in the Quest CSLA area. Enbridge has indicated that it welcomes continued engagement and information sharing to support a collaborative approach to development planning. Shell will also have an opportunity to review the post-drill Directive 065 application when it may be submitted, including the review of available pressure data.

Accordingly, your concerns relate to impacts that may or may not arise from injection activities that Enbridge may apply for at a future date as part of the second step of the two-step pre-drill process and are related to matters outside the scope of the current application. You have not demonstrated that you may be directly and adversely affected by approval of the application.

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 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 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>

Steve Thomas

Director, Oil and Gas Subsurface, Waste and Storage

/at

Attachment (1) Approval;

cc: Emma Pimm, Enbridge Wabamun Hub Ltd.

Lanre Maliki AER

ADR, AER

SOC Inbox, AER

Field Operations, Northeast, AER