

August 11, 2022

By Email Only

Mr. Lloyd Maxwell
C L Land Services

Statement of Concern No. 32102
Shell Canada Limited (Shell)
Application No. 31184722
Location: 01-23-002-22W4M

Dear Mr. Maxwell:

You are receiving this letter because you filed a statement of concern (SOC) about Application No. 31184722. 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:

- Detailed Site Assessments (DSAs) of the sites (wellsite, access road and campsite) for landscape, soil, and vegetation were conducted in August 2017. The DSA showed that the conditions of the soil, landscape, and vegetation parameters for the wellsite were comparable both on-site and off-site and met the *2010 Reclamation Criteria for Wellsites and Associated Facilities for Cultivated Lands* (Reclamation Criteria). Deficiencies identified in the assessments for the access road and campsite were remediated. Follow up DSAs and assessments for the access road and campsite were conducted in 2018, 2019 and 2020 and indicated that all parameters of the Reclamation Criteria were met.
- A site visit was conducted on May 4, 2022 and May 24, 2022 wherein AER staff confirmed that the landscape parameters appeared to be comparable both on and off-site and met the Reclamation Criteria. Regarding your concern about the depression on the site, AER measurements of the fill addition depth on-site did not indicate a subsidence issue based on depth and topography and was deemed satisfactory.

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.

Sincerely,

<Original Signed By>

Andrew MacPherson
Director, In Situ
Regulatory Applications
/ek

Attachment (1): Reclamation Certificate

cc: Deanna Cottrell, Shell Canada Limited
SOC Inbox, AER
Kelli Woodman, Reclamation Assessor, AER
Reclamation Inbox, AER
Field Operations South, AER