Alberta Energy Regulator

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September 28, 2026

Burnet, Duckworth & Palmer LLP

Attention: Peter Ciechanowski

Alberta Energy Regulator – Regulatory Compliance Branch

Attention: Bronwhyn Simmons, Counsel
Kelsey Chisamore-Johnston, Counsel

Dear Parties:

RE: Request for Regulatory Appeal by Mooncor Energy Inc. (Mooncor)
Alberta Energy Regulator – Regulatory Compliance Branch (Regulatory Compliance)
Abandonment Order dated April 30, 2026
Location: various
Request for Regulatory Appeal No.: 1961434

The Alberta Energy Regulator (AER) has considered Mooncor's request for a regulatory appeal under section 38 of the *Responsible Energy Development Act* (REDA), regarding the issuance of an order on April 30, 2026 requiring Mooncor to, among other things, abandon seven wells for which Mooncor holds licences (the Order). The AER has reviewed Mooncor's submissions and the submissions made by Regulatory Compliance.

For the following reasons, the AER has decided that Mooncor is entitled to a regulatory appeal of the decision to issue the Order.

Reasons for Decision

Legislative Provisions

The applicable provision of REDA in regard to regulatory appeals, section 38, states:

> 38(1) An **eligible person** may request a regulatory appeal of an **appealable decision** by filing a request for regulatory appeal with the Regulator **in accordance with the rules**. [emphasis added]

Section 36(a) of REDA provides that an "appealable decision" includes, among other things, an AER decision in respect of which a person would otherwise be entitled to submit a notice of appeal under section 91(1) of the *Environmental Protection and Enhancement Act* (EPEA), or an AER decision that was made under an energy resource enactment, if the decision was made without a hearing.

Security Classification: Public

Section 36(b) of REDA provides that an "eligible person" includes a person entitled to submit a notice of appeal under section 91(1) of EPEA or a person who is directly and adversely affected by a decision made under an energy resource enactment (section 36(b)(i) and (ii) of REDA). Section 91(1)(f) of EPEA provides that where the AER issues an environmental protection order regarding conservation and reclamation under section 140 or 141, the person to whom the order is directed may submit a notice of appeal.

Section 39(4) of REDA provides the AER with discretion to dismiss all or part of a request for a regulatory appeal in the following circumstances:

> (a) if the Regulator considers the request to be frivolous, vexatious or without merit,
>
> (b) if the request is in respect of a decision on an application and the eligible person did not file a statement of concern in respect of the application in accordance with the rules, or
>
> (c) if for any other reason the Regulator considers that the request for regulatory appeal is not properly before it.

Analysis

Appealable Decision

Regulatory Compliance issued the Order to Mooncor under sections 22, 25(a), and 27 of the *Oil and Gas Conservation Act*, sections 137, 140, and 241 of the EPEA, and section 3.012(c) of the *Oil and Gas Conservation Rules*, without a hearing. Accordingly, we find that Regulatory Compliance's decision to issue the Order is an appealable decision.

Eligible Person

Mooncor asserts that it is an "eligible person" to request a regulatory appeal as the licensee of the wells that are subject to the Order. Regulatory Compliance did not provide submissions disputing that position. Having reviewed the Order and the parties' submissions, it appears the conditions set out in the Order are sufficient to determine that Mooncor is an "eligible person".

In accordance with the Rules

Mooncor filed its request for regulatory appeal within the applicable timelines set out in section 30(3) of the *Alberta Energy Regulator Rules of Practice* (Rules), and the request included the information required by section 30(1) of the Rules.

Section 39(4)

Having read the submissions of both Regulatory Compliance and Mooncor, the AER has determined that in this circumstance there is justification to grant Mooncor's request for regulatory appeal.

Conclusion

Given the above, Mooncor's request for regulatory appeal is granted and will be referred to the Chief Hearing Commissioner for hearing panel assignment.

Sincerely,

<Original signed by>

Todd Shipman
Senior Advisor, Induced Seismicity & Geologic Hazards

<Original signed by>

David Helmer
Senior Advisor, Regulatory