

October 14, 2022

Enforcement File: 2017-266 FSJ

Predator Oil BC Ltd.
1500, 250-2nd Street, SW
Calgary, Alberta T2P 0C1

Attention: Mr. Greg MacDonald

Re: General Order 2017-103

Dear Mr. MacDonald:

On October 23, 2017, the BC Oil and Gas Commission (Commission) issued General Order 2017-103 to Predator Oil BC Ltd. (Predator). This order pertained to a Liability Management Plan and to document decommissioning and restoration work to achieve a specified reduction in liability. By June 2020, all Predator assets were either transferred to other companies or the Orphan Fund.

Pursuant to section 49(8) of the Oil and Gas Activities Act, the Commission hereby terminates General Order 2017-103. The termination of this Order does not affect or relieve Predator from any consequences of any previous failure(s) to comply.

If you have any questions or concerns, please do not hesitate to contact the Commission.

Sincerely,



Dax Bourke
Executive Director, Compliance & Enforcement
BC Oil and Gas Commission

GENERAL ORDER 2017-103
Section 49 *Oil and Gas Activities Act*

Issued to:

Predator Oil BC Ltd.
1500, 250-2nd Street, SW
Calgary, Alberta, T2P 0C1

Attention: Mr. Greg MacDonald

Order:

Pursuant to section 49(1)(a) of the *Oil and Gas Activities Act* (the Act), I, Lance Ollenberger, order that Predator Oil BC Ltd. (Predator) must:

- 1) By October 31, 2017, submit a Liability Management Plan (Plan) to the satisfaction of the Commission electronically to C&E@bcogc.ca. The Plan must:
 - a) Document the work plan and schedule for the decommissioning and restoration of infrastructure associated with oil and gas activities and related activities that are owned and operated by the permit holder; and,
 - b) Document how decommissioning and restoration work will, by May 31, 2018, achieve a \$5,000,000 reduction in the deemed liability of Predator's infrastructure that was identified by the Commission under its Liability Management Rating Program as at June 2, 2017.

Conditions:

- A. This Order shall remain in effect until amended or terminated in whole or in part by the Commission.

Reasons:

I make this Order for the following reasons:

- i. On June 1, 2017, the Commission approved an application to transfer application determination #'s and authorizations from Penn West Petroleum Ltd to Predator (the "Approval"). That Approval is attached to this Order.
- ii. Conditions of the Approval included the following:
 1. By June 30, 2017, the permit holder must develop a Liability Management Plan to the satisfaction of the Commission. The Liability Management Plan must:
 - a. Document the work plan and schedule for the decommissioning and restoration of infrastructure associated with oil and gas activities and related activities that are owned and operated by the permit holder; and,

General Order 2017-103

- b. Document how decommissioning and restoration work will, by May 31, 2018, achieve a \$5,000,000 reduction in the deemed liability of the permit holder's infrastructure that has been identified by the Commission under its Liability Management Rating Program as at June 2, 2017.
2. The permit holder must implement the Liability Management Plan submitted to the Commission to (1) above.
- iii. On September 27, 2017, Predator submitted a proposed Plan to the Commission.
- iv. The Commission reviewed the proposed Plan and found that it is was not satisfactory.
- v. On October 4, 2017 the Commission sent Predator a letter which advised that the proposed Plan failed to meet Condition 1 of the Approval and further that the Plan should:
- identify the sites where decommissioning or restoration work will be undertaken,
 - identify the scope of the work being undertaken at each site,
 - identify work schedules, and
 - document how decommission and restoration work will, by May 18, 2018 achieve the required reduction in liabilities.
- vi. To date the Commission has not received a satisfactory Plan.
- vii. I am of the opinion that Predator is not in compliance with a condition of its Approval.

Review and Appeal:

Predator may request a review of this Order under section 70 of the Act by submitting a request for review to ogc.determinationreviews@bcogc.ca.

Predator may appeal this Order to the Oil and Gas Appeal Tribunal under section 72 of the Act. The process for appeals can be found at www.ogat.gov.bc.ca and a notice of appeal may be sent to the Oil and Gas Appeal Tribunal at:

Oil and Gas Appeal Tribunal
PO Box 9425 Stn Prov Govt
Victoria, BC, V8W 9V1



Lance Ollenberger
Vice President, Operations
BC Oil and Gas Commission

DATED AT Fort St. John, in the Province of British Columbia, this 23rd day of October, 2017.

Attachment: Predator Transfer Approval