

September 26, 2022

Enforcement File: 2018-134FSJ

Predator Oil BC Ltd.
C/O Sproule Niven Fischer Limited
900,140-4th Avenue SW
Calgary, Alberta T2P 3N3

Attention: Mr. Wayne Pridham

Re: General Order 2018-014

Dear Mr. Pridham:

On July 30, 2018, the BC Oil and Gas Commission (Commission) issued General Order 2018-014 to Predator Oil BC Ltd.(Predator).This order pertained to WA #11778. On June 18,2020 this well was transferred to the Orphan Fund.

Pursuant to section 49(8) of the Oil and Gas Activities Act, the Commission hereby terminates General Order 2018-014. 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 2018-014
Section 49 *Oil and Gas Activities Act*

Issued to:

Predator Oil BC Ltd.
C/O Sproule Niven Fischer Limited
900, 140-4th Avenue SW
Calgary Alberta T2P 3N3

Attention: Mr. Wayne Pridham

Order:

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

1. On or before 4:00 PM, August 7th, 2018:
 - a) install and maintain a hydrogen sulphide (H₂S) detection and alarm system that is continuously monitored for well WA 11778 (the subject well) located at 6-4-85-20 W6M; **or**
 - b) downhole suspend the subject well in accordance with section 25(5) of the Drilling and Production Regulation; and
 - c) submit evidence that item “a” or “b” has been completed electronically to the Compliance and Enforcement mailbox at C&E@bcogc.ca.

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. Predator is the permit holder of the subject well.
- ii. Gas analysis results completed in 2005 identified 4.9% H₂S content at WA 11778.
- iii. Section 39(4) of the Drilling and Production Regulation (DPR) states:
 - (4) If an uncontrolled flow of oil or gas from a completed well, other than a well suspended in accordance with section 25, could produce a hydrogen sulphide concentration greater than 100 ppm in atmosphere within 50 metres of the well, the permit holder of the well must install and maintain:
 - (a) an automated system to isolate the well in the event of an uncontrolled flow of oil or gas, and

- (b) if the well is located within 1600m of a populated area, a hydrogen sulphide detection and alarm system that is continuously monitored and is capable of activating the automated system referred to in paragraph (a).
- iv. The subject well is located approximately 960 metres from a populated area.
 - v. Dispersion modeling shows that the well could produce an H₂S concentration greater than 100 ppm in atmosphere within 50 metres of the well.
 - vi. The subject well meets the requirements of a medium risk well and has not been suspended in accordance with section 25 of the DPR (no downhole suspension to prevent flow coming up the wellbore).
 - vii. On July 27, 2018 Commission staff attended to the subject well and observed that the site is not equipped with an H₂S detection and alarm system.
 - viii. I am of the opinion that Predator is not in compliance with section 39(4) of the DPR.

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 may 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



Patrick Smook
Director, Compliance and Enforcement
Oil and Gas Commission

DATED AT Fort St. John, in the Province of British Columbia, this 30th day of July, 2018.