

May 13, 2025

Enforcement File: 2023-0129-01

Harvest Operations Corp.
Suite 2150, 736 – 6th Ave SW
Calgary, Alberta T2P 3T7

Attention: Darlene Loeffel, Vice-President, Operations

Re: General Order 2023-0129-01

Dear Ms. Loeffel,

On December 12, 2024, the BC Energy Regulator issued General Order 2023-0129-01 to Harvest Operations Corp. (Harvest).

Please be advised that pursuant to section 49(8) of the *Energy Resource Activities Act*, General Order 2023-0129-01 is hereby terminated.

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

Sincerely,



Robert Workman
Manager, Enforcement
BC Energy Regulator

GENERAL ORDER 2024-0129-01
Section 49 *Energy Resource Activities Act*

Issued to:

Canadian Natural Resources Limited
2100, 855-2nd Street SW
Calgary, Alberta T2P 4J8

Attention: Chad Temple, Regulatory Coordinator

Order:

Pursuant to section 49(1)(d) of the *Energy Resource Activities Act* (the Act), I, Robert Workman, order that Canadian Natural Resources Limited (CNRL) must:

1. Repair the casing leak identified by CNRL at well d-46-K/94-H-10 WA #15681 (the well) by March 31, 2026.
2. Submit an email confirming completion of item 1 above to the British Columbia Energy Regulator (BCER), Compliance and Enforcement mailbox at C&E@bc-er.ca within 5 days of completion of item 1.
3. If the well is not abandoned in completing item 1 above, conduct and submit to the BCER via eSubmission the results of a surface casing vent flow and build up test for the well within 30 days of completion of item 1.

Conditions:

- A. This order shall remain in effect until
- i. amended or terminated in whole or in part by the BCER.

Reasons:

I make this order for the following reasons:

- i. CNRL is the permit holder for WA 15681, CNRL Gutah D-046-K/094-H-10.
- ii. On October 26, 2021, CNRL reported a surface casing vent flow (SCVF) at WA 15681, with emissions of 110.4 m3/day.
- iii. In an email dated April 20, 2022, CNRL provided an assessment of WA 15681 indicating that the wellhead seals were tested in 2021 and passed, that “the most likely leak path is a loss of integrity of the production casing”.

- iv. In the WA 15681 assessment dated April 20, 2022, CNRL states “CNRL plans to execute these repairs in the earliest possible timeframe. A repair was intended to occur in Q1 of 2022, unfortunately the services required fell through late in the winter access window, and a replacement was not able to be sourced. The next available window for the repair will be the winter of 2023/2024 “.
- v. In an email dated July 16, 2024, CNRL indicated the well repairs were not going to be completed in winter 2024 and it has delayed the repair into 2025 due to cost of winter access.
- vi. Section 18 (8) of the Drilling and Production Regulation (DPR) provides:
 - (8) On detection of a casing leak or failure, a well permit holder must
 - (a) notify the regulator about the leak or failure without delay, and
 - (b) repair the leak without unreasonable delay.
- vii. I am of the opinion that CNRL has failed to comply with section 18(8)(b) of the DPR.

Review or Appeal

CNRL may request a review of this order under section 70 of the Act or appeal this order under section 72 of the Act. Both a review and an appeal of the order cannot be commenced simultaneously.

A request for review may be sent to: determinationreviews@bc-er.ca.

Alternatively, a notice of appeal may be sent to the Energy Resource Appeal Tribunal info@bcerat.ca or mailed to:

Energy Resource Appeal Tribunal
PO Box 4925 Stn Prov Govt
Victoria, BC V8W 9V1

Information regarding the process for appeals may be found at www.bcerat.ca



R.A. Workman
Manager, Enforcement
BC Energy Regulator

DATED AT Fort St. John, in the Province of British Columbia, this 16th day of December, 2024.