

ORDER & REQUEST
Section 38 *Oil and Gas Activities Act*
2021-0204-01

Issued to:

Sukunka Natural Resources Inc.
2100,855-2nd Street, SW
Calgary, Alberta, T2P 4J8

Attention: Mr. Bill Clapperton, VP

Order:

Pursuant to section 38(1)(c) of the *Oil and Gas Activities Act* (the Act), I, Patrick Smook, order that Sukunka Natural Resources Inc. (Sukunka) must:

1. Prepare and maintain a record of each comprehensive survey completed for each well and facility that Sukunka is required to carry out in 2022 pursuant to section 41.1 of the Drilling and Production Regulation (DPR). The report must identify, at a minimum: the date and method of survey for each well and facility, whether storage tanks are present (uncontrolled or controlled), whether leaks are identified and if so, whether the leak contains H₂S, the leak rate and rate quantification method.
2. Prepare and maintain a record of all repairs for each well and facility where a leak is detected. The report must identify, at a minimum: the component type, the date of the repair, and the method of leak repair.

Request:

Pursuant to section 38(1)(e) of the Act, the Commission requests that Sukunka submit a copy of the prepared records in spreadsheet form for the comprehensive surveys for those wells and facilities surveyed during the months of January, February and March, 2022, by no later than May 31,2022 to air.monitoring@bcogc.ca

Conditions:

This Order shall remain in effect until:

- I. All directives identified on this order have been completed as required, or
- II. Amended or terminated by the Commission.

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Reasons:

I make this order for the following reasons:

- i. Sukunka is the permit holder of multiple wells and facilities. Section 41.1(2) of the DPR requires a facility permit holder who operates a facility to carry out surveys of the facility in the manner and at the frequencies set out in the DPR.
- ii. Section 41.1(3) of the DPR requires a well permit holder who operates a well to carry out surveys of the well in the manner and at the frequencies set out in the DPR.
- iii. The purpose of a survey of a facility or well is to detect methane leaks, quantification and complete any repairs to address the leak.
- iv. To date, Sukunka has provided an average emissions rate for its wells and facilities. Sukunka has not provided surveys for each well and facility operated by Sukunka.
- v. An average emissions rate does not provide site-specific information to identify whether a well or facility may have a methane leak and whether any repairs to the facility or well are necessary.
- vi. The Commission requires information contained within the survey of each facility and well in order to detect any methane leak from a facility or well, quantify the leak and determine whether any repairs to address the leak were required and completed.



Executive Director, Compliance and Enforcement
BC Oil and Gas Commission

DATED AT Fort St. John, in the Province of British Columbia, this 4th day of January, 2022.