

January 30, 2026

5852-2805-59240-13

Ted Bowen  
Bench Creek Resources Ltd.  
57017 Range Road 141  
Yellowhead County, AB T7E 3Z7

Dear Mr. Bowen:

**RE: TEMPORARY GAS RECYCLING SPECIAL PROJECT APPROVAL AMENDMENT #2  
MAXHAMISH FIELD – CHINKEH ‘A’ POOL**

Bench Creek Resources Ltd. (BCR) has applied dated August 6, 2025, requesting a 1-year extension of the gas recycling project in the Maxhamish Field, Chinkeh ‘A’ Formation.

The discovery well, *Mobil BP PCI Max c-51-B/94-O-14 (WA 7573)*, was drilled in 1991. GEP approval (Order 99-06-012) was issued in 1999 to allow optimized well spacing, followed by concurrent production and GEP approval (Order 08-07-003) in 2008, after an oil leg was identified in 2003. In January 2023, four wells were approved for commingled production with the Scatter formation.

In late May 2024, the Fort Nelson Gas Plant was suspended indefinitely, stranding gas production from the pool. On June 16, 2024, the BC Energy Regulator (BCER) granted temporary approval for gas reinjection via 11 repurposed production wells in the center of the pool, enabling BCR to continue recovering hydrocarbon liquids from the produced gas stream. The approval has been extended once via amendment #1, which provided a project expiry date of November 30, 2025.

The BCER has reviewed the application and supplemental integrity analysis provided by Vision Integrity Engineering and has no concerns with continued operation of the project for an additional year.

The following Orders are attached:

- 1) **Order 24-13-001 Amendment #2** designating a Gas Recycling project within the Maxhamish field – Chinkeh ‘A’ pool, as a Special Project under section 75 of the Energy Resource Activities Act, and
- 2) **Order 24-13-001 Amendment #2 - OTN** approving Other Than Normal Spacing under section 65.1 of the Petroleum and Natural Gas Act for the subject area and formation.

**This amendment grants an extension of the temporary gas recycling project to November 30, 2026.**

Should you have any questions, please contact Logan Gray at (250) 419-4465 or the undersigned at (250) 419-4482

Sincerely,



Michelle Gaucher, P.Eng  
Supervisor, Reservoir Engineering  
BC Energy Regulator



## ORDER 24-13-001 Amendment #2

1 Under section 75(1)(a) of the *Energy Resource Activities Act*, the Maxhamish field – Chinkeh ‘A’ pool is designated as a Special Project for the recovery of hydrocarbon liquids utilizing gas recycling within the following area;

NTS 94-O-6 Block J - units 20, 30, 38-40, 48-50, 56-60, 66-70, 76-80, 86-90, 96-100  
Block K - units 11-19, 21-29, 31-39, 41-49, 51-59, 61-69, 71-100  
Block L - units 71, 81, 91

94-O-11 Block B - units 6-10, 14-20, 24-30, 34-40, 44-50, 54-60, 64-70, 72-80, 82-90, 92-100  
Block C - units 1-75, 81-85, 91-93  
Block D - units 1, 11, 21, 31, 41, 51, 61  
Block F - units 1-3, 11-15, 21-25, 31-35, 41-45, 51-55, 61-65, 71-77, 81-87, 91-97  
Block G - units 2-100  
Block H - units 20, 30, 40, 50, 60, 70, 80, 90, 100  
Block I - units 10, 20, 30, 40, 50, 58-60, 68-70, 78-80, 88-90, 98-100  
Block J - units 1-100  
Block K - units 1-7, 11-17, 21-27, 31, 41, 51-53, 61-63, 71-75, 81-85, 91, 94-97

94-O-14 Block A - units 8-10, 18-20, 26-30, 36-40, 46-50, 56-60, 66-70, 76-80, 86-90, 96-100  
Block B - units 1-39, 41-49, 51-59, 61-69, 71-79, 81-89, 91-98  
Block C - units 1, 4-7, 11, 21  
Block G - units 1-8, 11-18, 21-28, 31-37, 41-47, 51-57, 61-67, 71-75, 81-85, 91-95  
Block H - units 6-10, 18-20, 28-30, 38-40, 48-50, 58-60, 68-70, 78-80, 88-90, 98-100  
Block I - units 8-10 and  
Block J - units 1-5.

2 Under section 75(2) of the *Energy Resources Activities Act*, the special project designation in this Order is subject to the following conditions:

- The project unadjusted daily oil allowable (UDOA) is waived.
- All associated produced gas must be conserved or reinjected.
- Gas produced from the Maxhamish field Chinkeh ‘A’ pool may be reinjected into this pool via the following wells and intervals

Bench Creek Res Maxhamish a-53-J/94-O-11 (WA 10246), 1480-1485.6 mKB  
Bench Creek Res Maxhamish b-22-J/94-O-11 (WA 10869), 1465.5-1469.5 mKB  
Bench Creek Res Maxhamish c-55-J/94-O-11 (WA 11208), 1548.5-1549.5 mKB  
Bench Creek Res Maxhamish c-51-J/94-O-11 (WA 11224), 1404.5-1406.5 mKB  
Bench Creek Res Maxhamish c-32-J/94-O-11 (WA 11261), 1456.5-1458 mKB  
Bench Creek Res Maxhamish d-36-J/94-O-11 (WA 11618), 1580.5-1582.5 mKB  
Bench Creek Res Maxhamish d-34-J/94-O-11 (WA 11619), 1522-1524 mKB  
Bench Creek Res Maxhamish d-25-J/94-O-11 (WA 13298), 1537.5-1540.5 mKB  
Bench Creek Res Maxhamish d-45-J/94-O-11 (WA 13492), 1542-1544 mKB  
Bench Creek Res HZ Maxhamish c-56-J/94-O-11 (WA 15321), 1708-2724 mKB  
Bench Creek Res HZ Maxhamish c-A56-J/94-O-11 (WA 15324),  
Drilling Event 1 - 1705-2605 mKB  
Drilling Event 2 - 2166.5-2210 mKB

- d) Not exceed an injection pressure, measured at the wellhead of 6,000 kPag for the wells listed in c), or the pressure required to fracture the formation, whichever is lesser.
- e) Continually measure and record the wellhead tubing and casing pressures electronically for wells listed in (c).
- f) Cease injection for the well listed in (c) and notify the Regulator at [Reservoir@bc-er.ca](mailto:Reservoir@bc-er.ca) immediately if there is any indication that hydraulic isolation is lost in the wellbore or formation.
- g) Conduct annual Surface Casing Vent Flow tests on the wells listed in (c) and submit to the Regulator within 30 days of the completion of the test.
- h) Not exceed an average pool pressure of 8,575 kPaa measured at 913 meters subsea.
- i) Prior to March 31<sup>st</sup>, 2026, stabilized reservoir pressure must be obtained using downhole recorders from:
  - i) At least two wells in the gas pool, in reasonable proximity to the injection wells listed in c), and selected to ensure adequate areal distribution, excluding:
    - (1) Bench Creek Res Maxhamish d-63-J/94-O-11 (WA 13306), and
    - (2) Bench Creek Res HZ Maxhamish B-15-J/94-O-11 (WA 27568); and
  - ii) At least one well in the oil pool, excluding:
    - (1) Bench Creek Res Et Al Maxhamish D-69-J/94-O-11 (WA 10876), and
    - (2) Bench Creek Res Et Al Maxhamish c-52-K/94-O-11 (WA 10745).
- j) Injection must cease upon termination of production from the pool.
- k) This order expires on November 30<sup>th</sup>, 2026, unless amended by the Regulator.



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Michelle Gaucher, P.Eng  
Supervisor, Reservoir Engineering  
BC Energy Regulator

DATED AT the City of Victoria, in the Province of British Columbia, this 30<sup>th</sup> day of January, 2026.

**ORDER 24-13-001 Amendment #2 - OTN**

1 Under Section 65.1(2) of the Petroleum and Natural Gas Act, Other Than Normal Spacing is approved in the Maxhamish field – Chinkeh 'A' pool within the following area;

NTS 94-O-6 Block J - units 20, 30, 38-40, 48-50, 56-60, 66-70, 76-80, 86-90, 96-100  
Block K - units 11-19, 21-29, 31-39, 41-49, 51-59, 61-69, 71-100  
Block L - units 71, 81, 91

94-O-11 Block B - units 6-10, 14-20, 24-30, 34-40, 44-50, 54-60, 64-70, 72-80, 82-90, 92-100  
Block C - units 1-75, 81-85, 91-93  
Block D - units 1, 11, 21, 31, 41, 51, 61  
Block F - units 1-3, 11-15, 21-25, 31-35, 41-45, 51-55, 61-65, 71-77, 81-87, 91-97  
Block G - units 2-100  
Block H - units 20, 30, 40, 50, 60, 70, 80, 90, 100  
Block I - units 10, 20, 30, 40, 50, 58-60, 68-70, 78-80, 88-90, 98-100  
Block J - units 1-100  
Block K - units 1-7, 11-17, 21-27, 31, 41, 51-53, 61-63, 71-75, 81-85, 91, 94-97

94-O-14 Block A - units 8-10, 18-20, 26-30, 36-40, 46-50, 56-60, 66-70, 76-80, 86-90, 96-100  
Block B - units 1-39, 41-49, 51-59, 61-69, 71-79, 81-89, 91-98  
Block C - units 1, 4-7, 11, 21  
Block G - units 1-8, 11-18, 21-28, 31-37, 41-47, 51-57, 61-67, 71-75, 81-85, 91-95  
Block H - units 6-10, 18-20, 28-30, 38-40, 48-50, 58-60, 68-70, 78-80, 88-90, 98-100  
Block I - units 8-10 and  
Block J - units 1-5.

2 Under section 65.1(3) of the Petroleum and Natural Gas Act, I specify the following:

- a) the target area for an oil well completed within the project area is not nearer than 100 m to the sides of the Other Than Normal Spacing area,
- b) the target area for a gas well completed within the project area is not nearer than 250 m to the sides of the Other Than Normal Spacing area,
- c) an oil or gas well completed outside the target area specified in paragraphs (a) and (b) respectively, may be subject to an off-target production penalty,
- d) oil and gas wells drilled within the specified project area are not subject to spacing requirements.
- e) This order expires on November 30<sup>th</sup>, 2026, unless amended by the Regulator.



Michelle Gaucher, P.Eng  
Supervisor, Reservoir Engineering  
BC Energy Regulator

DATED AT the City of Victoria, in the Province of British Columbia, this 30<sup>th</sup> day of January, 2026.