

## IESP Well Workover Commitment Register

<b>Document Number</b>	IESP-REGU-RG-RGT-9011
<b>Document Revision</b>	1
<b>Document Status</b>	IFRR
<b>Document Type</b>	Register
<b>Division</b>	Regulatory Compliance
<b>Discipline</b>	Regulatory Management
<b>Document Owner</b>	Alan MacDonald
<b>Revision Date</b>	2023-12-14
<b>Security Classification</b>	CONFIDENTIAL DOCUMENT

## COMMITMENT REGISTER - OVERVIEW

### Definitions

A COMMITMENT is a voluntary statement of action, or a goal, offered by authorized IESPL personnel to the public, stakeholder(s) and/or regulator(s). Commitments are derived from publicly available information (e.g. corporate policies, IESPL website, meeting minutes, public announcements, public presentations, regulatory applications including impact assessments, project descriptions, the development plan or other applications; IR responses, or letters to stakeholders). Commitments can also be in emails, or verbal, in which case they are recorded in IESPL Meetings of Minutes or the IMS Stakeholder Meeting Log (phone calls, emails, virtual meetings, face to face meetings).

CONDITIONS are activities or actions IESPL is legally bound to complete (e.g. from an approval issued by a regulatory agency).

Canada Energy Regulator defines conditions as: *"Conditions are legal requirements that a company must satisfy to be allowed to perform activities under an Authorization. Conditions are important tools in the responsible development of projects through all lifecycle phases (e.g., prior to and during construction, post-construction, operation and maintenance, and abandonment). Conditions create project-specific requirements that complement general statutory, regulatory, and other requirements."*

Conditions are typically delivered to IESPL from a regulator and are derived from Regulator Approvals, Permit Terms and Conditions, Orders, or other official correspondence. Conditions are normally provided in writing from the regulatory authority to IESPL.

REQUESTS are activities or actions delivered to IESPL from a stakeholder that is not a regulator. (e.g. actions that are requested by community organizations as a condition of support (or not) for the project) Requests are not legally binding in the same manner as conditions, but should be carefully considered and must be recognized and replied to by IESPL, particularly if the request is not to be implemented. Requests may result in further engagement, discussion and/or negotiation with a community or stakeholder.

In short, COMMITMENTS come from IESPL, CONDITIONS come from regulatory authorities, and REQUESTS come from community organizations or stakeholders. Collectively, commitments, conditions and requests are referred to as "Commitments" in this register. Legislation and government guidelines are important obligations that are not tracked in the Commitment Register. These documents are listed and cross-referenced with project activities in the IESPL "Legal Register".

### Objective

The IESPL Commitment Register is part of the IESP Integrated Management System (IMS) to assist IESPL in meeting our legal obligations and requirements as well as our commitments to and requests from communities and stakeholders. The Commitment Register is used to ensure commitments are implemented into the appropriate part of engineering, design, planning, construction, procurement and/or operations, as required. Each commitment will be "closed out" on the Register before project phase completion, indicating that the commitment has been responsibly managed. Ongoing commitments will be tracked and regularly reviewed by Senior Management to ensure they are still appropriate and are being met.

### Instructions

#### Initiating the Commitment Register

The Director, Regulatory Compliance with the input and support of the Community Relations Lead, and the Discipline Leads, is responsible for ensuring commitments are properly recorded into the Commitment Register. The Director, Regulatory Compliance is also responsible for ensuring that new entries are communicated to the appropriate party (e.g. the discipline lead(s) responsible for implementing a given commitment).

New entries MUST include:

- 1) a unique Identifier number,
- 2) the source of the commitment in the "Reference Documents" worksheet, including
- 3) page and paragraph number where possible, and,
- 4) the commitment, copied VERBATIM from the source.

Characterization of the commitment into TYPE, PHASE, ASPECT and RESPONSIBLE PARTY should be completed shortly following the entry and may require the support of a subject matter expert (SME) or a Division Lead. Cell entries requiring the support of an SME are highlighted in yellow until they are confirmed.

#### Register Maintenance and Communication

The Director, Regulatory Compliance, or designate, shall work with the Community Relations Lead, other Division Leads, Entity Leads, and/or Discipline Leads to maintain an accurate status of each commitment on the register. The register shall be updated as needed and controlled properly so only the most recent version is available in the IMS.

As the project progresses, commitments may become obsolete or may not be feasible to implement within the project. The Commitment Register is used to track the status of all commitments including rationale for those commitments that become obsolete or are not feasible. These changes in status are tracked in the Commitment Register.

Numerous commitments are similar. These commitments are highlighted in light blue and will be consolidated at a later date. Consolidations will include the unique Identifier numbers and the sources for each of the commitments that went into the consolidation. Communication of an update to the commitment register should be emailed from the Director, Regulatory Compliance to the Responsible Lead within 2 business days. The Responsible Lead is responsible to notify all affected leads of the new commitment(s) within 3 business days.

**Audit and Evaluation**

The Commitment Register will be audited annually. Specific items to be audited include:

Consolidations  
Accuracy of descriptions, characterizations, and assignment of responsible leads  
Source description  
Evidence of communication completeness  
Closures and implementation

**Management Review and Continual Improvement**

The Commitment Register will be reviewed by the Senior Management Team and approved by the IESPL President at an agreed frequency for the project. After each review and approval the signed Commitment Register will be converted to PDF and saved while updates will continue in the live register. The "live" version of the Commitment Register is located in the IMS at this link:

[Integrated Management System - REGISTERS - All Documents \(sharepoint.com\)](#)

## Inuvialuit Energy Security Project

### Summary of Reference Documents Relevant to Well Workover

Updated: 2023-12-08

Submitted to CER 2023-12-14

Source	CER Source	Document Owner	File Name	Document Type	Document Title	Source Date / Revision	Link
61	25	IESPL	2022-11-18_IESPL Response to CER Information Request No.1 Well Workover	IR Response	Information Request Response to Information Request No.1 (Well Workover OA)	2022-11-18	<a href="#">2022-11-18_IESPL Response to CER Information Request No. 1_Well Workover.docx (sharepoint.com)</a>
63	26	IESPL	2023-01-27_IESPL Response to CER Information Request No.2 WW IFRR	IR Response	Information Request Response to Information Request No.2 (Well Workover OA)	2023-01-27	<a href="#">2023-01-27_IESPL Response to CER Information Request No.2_WW_IFRR.docx (sharepoint.com)</a>
67	27	IESPL	2023-04-07_IESPL to CER Response to IR No.4 ESW and WW IFRR	IR Response	Information Request Response to Information Request No. 4 (ESW and WW OAs)	2023-04-07	<a href="#">2023-03-24_IESPL to CER_Response to IR_No.4 - ESW and WW_IFRR.docx (sharepoint.com)</a>
68	28	IESPL	2023-04-04_IESPL to CER Response to IR No.5	IR Response	IESPL Response to CER IR No. 5 - Proposed Changes to IESP Development Plan	2023-04-04	<a href="#">Integrated Management System - 2023-04-06_IESPL to CER_Response to IR No.5.pdf - All Documents (sharepoint.com)</a>
70	29	CER	Letter Decision (Well Workover OA)	Approval	CER Letter Decision - Well Workover OA	2023-06-28	<a href="#">Integrated Management System - 2023-06-28_C25241-1_Commission_Letter_Decision_OA for Well Workover.pdf - All Documents (sharepoint.com)</a>
71	30	IESPL	AACW	Application	IESPL Application to Alter the Condition of a Well	2023-05-19	<a href="#">Integrated Management System - AACW ATTACHMENT-TUK M-18 Workover Program_FINAL_2023-05-19.pdf - All Documents (sharepoint.com)</a>
72	31	IESPL	OA Application for the Well Workover	Application	Application for Operations Authorization Inuvialuit Energy Security Project - Well Workover Phase	2022-07-29	<a href="#">Integrated Management System - IESPL Operations Authorization Application for the M-18 Well Workover.pdf - All Documents (sharepoint.com)</a>
74	32	IESPL	IESP EPP_Rev 4.2	EPP Final	Environmental Protection Plan Revision 4.2	2023-09-05	<a href="#">Integrated Management System - Submitted to CER - All Documents (sharepoint.com)</a>
75	33	IESPL	Environmental Protection Plan_REV 5.1 (003)	EPP Final (Preface Only)	Environmental Protection Plan Revision 5.1	2023-10-31	<a href="#">Integrated Management System - 2023-11-20_IESPL Response to CER ORCA_ESW OA - Condition 14 - IR No.1.pdf - All Documents (sharepoint.com)</a>

END OF DOCUMENT TO DATE

## Inuvialuit Energy Security Project

### Summary of Commitments from Well Workover OA and related submissions

Updated: 2023-12-14

Submitted to CER 2023-12-14

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead by:	Progress Status
<b>Commitments relevant to ALL PHASES are provided in the ESW Commitment Register</b>								
555	25	Sec.1.3.a	It is currently anticipated that IESP will operate one 12-hour shift per day (due to projected availability of personnel). If that is the case, the actual personnel numbers will be substantially less (likely about 60%).	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
556	25	Sec.1.3.b	Workers from outside the region will use the camps that are located away from the residential areas on lands zoned for industry purpose. Workers will be required to adhere to Camp Rules.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
557	25	Sec.1.3.b	Local contractors will be doing the work with Supervision from IESPL and will be required to adhere to IESPL policies and core values including responsible stewardship, social responsibility, and positive working culture.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
558	25	Sec.1.3.c	There will be a zero-tolerance policy on alcohol and drugs for our well workover personnel as per current practice for the energy industry. Well workover contractors will have to obligate to the zero-tolerance policy.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
559	25	Sec.1.3.c	All workers in the WW Phase will receive orientations and training that include IESPL Safety, Environment and Emergency Response plans and procedures.	Commitment	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
560	25	Sec.1.4.b1 and b2	At a minimum the procedures will include BOP certifications, inspections, testing, and daily walkaround inspections.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
561	25	Sec.1.4.b3	On site personnel will be evaluated by Resume and Interview with the Engineer hired by IESP to manage the well workover program.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
562	25	Sec.1.4.b3	Rig Operators will be expected to have a combination of experience and training.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
563	25	Sec.1.5	Vacuum insulated tubing will be made of the same material and installed throughout the permafrost region and below.	Commitment	Well Workover	M-18 Well	Civil/Structural - KEBA	Planned
564	25	Sec.1.11 Table 1-Item 11	...the final location of the spill response equipment will be confirmed no later than 90 days prior to commencement of activity. Locations will vary depending on the project phase and activity.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
565	26	Sec.2.34	Reference i) (IESPL Contractor Management Procedure), is still under development. The final version will be available for consideration by the Commission 90 days prior to commencement of the Early Site Works program.	Commitment	Well Workover	Jobs and Contracts	Corporate – Travis	Implemented and Closed
566	26	Sec.2.36.a	The BOP will be inspected and certified in accordance with CAODC RP 7.0 – Well Servicing Blowout Preventer Inspection and Certification.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
567	26	Sec.2.36.a	Upon installation the BOP and associated components will be pressure tested to 1400kPa and the working pressure of 35MPa.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
568	26	Sec.2.36.a	The annular preventer will be pressure tested to 1400kPa and 7000kPa.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
569	26	Sec.2.36.a	Detailed instructions for the operational and pressure testing of the BOP system will be included in the step-by-step operational program for the well workover of M-18.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
570	26	Sec.2.36.b	The rig hoisting system will be inspected and certified to CAODC RP 3.0 – Inspection and Certification of Masts.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
571	26	Sec.2.36.c	The recommendations for Drawworks and Carriers will be applied.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
572	26	Sec.2.36.c	CAODC RP 4.0 addresses eight components of the overhead equipment. The recommendations for the applicable items will be applied.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
573	26	Sec.2.37.a.1	The cleanup and flow test period will only be initiated during “day shift” but will likely extend into 24-hour operations, depending on the required duration (3 days maximum).	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
574	26	Sec.2.37.a.2	The wellhead will have been installed and pressure tested prior to breaking the ceramic disk in the tailpipe which isolates the formation pressure/fluids from the rest of the wellbore.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
575	26	Sec.2.37.a.2	During the test there will always be a minimum of two production test operators on site (two shifts of 12 hours) to monitor operations, with the authority and responsibility to shut-in the well in the event of an emergency or unsafe condition.	Commitment	Well Workover	Emergency Mgmt	Completions Engineer - Dick	Planned

576	26	Sec.2.37.a.2	The operators will be in cell phone and/or radio communication with the base camp at Tuktoyaktuk approximately 16 km away in case additional support is required.	Commitment	Well Workover	Emergency Mgmt	Operations - Brent	Planned
577	26	Sec.2.37.b.1	At the end of the day the main engines will be shut down and BOPs (pipe rams or blind rams as applicable) closed and locked. The only exception to this will be if it is necessary to shut down while running the production tubing.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
578	26	Sec.2.37.b.1	The night cap will be installed on the tubing if it is in the BOP.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
579	26	Sec.2.37.b.1	All valves between tanks (e.g., brine, diesel, etc.) will be closed. The only exception to this will be if fluid must be transferred during testing operations.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
580	26	Sec.2.37.b.1	The fuel level generators, light plants, etc. which will be left running and will be checked and refueled if required.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
581	26	Sec.2.37.b.1	A final walk around inspection and personnel head count will be performed before leaving the site.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
582	26	Sec.2.37.b.1	During most of the operation period, an oilfield boiler will be required and will be run on a 24-hour basis to prevent the freezing up of critical components.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
583	26	Sec.2.37.b.1	An operator with a Special Oilwell Operator certificate will always be on site (two shifts of 12 hours).	Commitment	Well Workover	Jobs and Contracts	Operations - Brent	Planned
584	26	Sec.2.37.b.1	If operations are not ongoing (e.g., at night) a second individual will be on site as well to ensure no individual is working alone.	Commitment	Well Workover	Health & Safety	Operations - Brent	Planned
585	26	Sec.2.37.b.1	As well as operating the boiler and related equipment, these individuals will perform periodic walk around inspections to ensure there are no spills, leaks, or other issues.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
586	26	Sec.2.37.b.1	As during the testing operations, the operators will be in cell phone and/or radio communication with the base camp at Tuktoyaktuk approximately 16 km away in case additional support is required.	Commitment	Well Workover	Emergency Mgmt	Operations - Brent	Planned
587	26	Sec.2.37.b.2	As described above, there will be a minimum of two individuals on site once operations commence, until the well is shut-in and secured. A temporary barricade will be placed on the access road to prevent unauthorized visitors.	Commitment	Well Workover	Health & Safety	Operations - Brent	Planned
588	26	Sec.2.37.c	There will be three levels of handover meetings.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
589	26	Sec.2.37.c	The incoming supervisor will meet with the outgoing supervisor to be briefed on the operations over the past 12 hours, and issues or concerns, and plans/expectations for the next 12 hours.	Commitment	Well Workover	Health & Safety	Operations - Brent	Planned
590	26	Sec.2.37.c	The incoming crew will then hold a safety meeting outlining the anticipated operations and issues for the next 12 hours, along with any concerns from previous operations.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
591	26	Sec.2.37.c	Finally, the operating personnel will briefly meet with their counterparts (operator to operator, derrickman to derrickman, etc.) to discuss any issues specific to their responsibilities.	Commitment	Well Workover	Health & Safety	Operations - Brent	Planned
592	25	Appendix 5 Sec.3	Well workover operations will most likely occur during the winter months and the stream freezes to bottom, but it must be assumed that any cleanup in the winter resulting from a spill may not be complete and follow-up in the spring and/or summer would be needed.	Commitment	Well Workover	Spills	Environmental - Alan	Planned
593	26	Sec.2.33	Reference iii) (IESPL Incident Accident Reporting and Management Procedure), is still under development. The final version will be available for consideration by the Commission 90 days prior to commencement of the Well Workover program.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
594	27	Sec.4.24	The IESP Health and Safety Plan has been updated as per CER request and will be filed in REGDOCS as Revision 2.0, on April 7, 2023, with the IR No. 3 Response.	Commitment	Well Workover	Health & Safety	Regulatory Group - Alan	Implemented and Closed
595	27	Sec.4.25	IESPL will ensure that the BOP equipment is inspected and certified in accordance with CAOEC Recommended Practice 6.0 "Inspection and Certification of Blowout Preventers".	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
596	27	Sec.4.27	A copy of the updated ERP, including changes as per 4.27 a) and 4.27 c), will be filed in REGDOCS on April 7, 2023, with the IR No. 3 Response.	Commitment	Well Workover	Emergency Mgmt	Regulatory Group - Alan	Implemented and Closed
597	27	Sec.4.28.b	A minimum of two personnel (likely IESP representative on site and the service rig manager) will attend the Energy Safety Canada Vapour Plume Ignition Training course or equivalent.	Commitment	Well Workover	Training and Capacity Building	Completions Engineer - Dick	Planned
598	27	Sec.4.28.b	A "dry run" practice of well ignition will be performed prior to drilling out of the current suspension plugs	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned

599	27	Sec.4.28.c	As above there will be two trained individuals on site during workover activities while the formation is open to the BOPs.	Commitment	Well Workover	Health & Safety	Operations - Brent	Planned
600	27	Sec.4.28.d	The onsite IESP representative will have the authority to ignite the well. They will be responsible to manage the well ignition and conduct and/or delegate the actual ignition.	Commitment	Well Workover	Emergency Mgmt	Operations - Brent	Planned
601	30	Pg.5 Sec. 1.1	Due to the presence of +/- 365m of permafrost, vacuum insulated tubing (VIT) will be run in the top +/- 400m of the well.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
602	30	Pg. 5 Sec. 1.1	A SubSurface Safety Valve (SSSV), chemical injection capillary lines, and a fibre optic distributed temperature monitoring line will be incorporated in the design.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
603	30	Pg. 5 Sec. 1.2	IPC through its wholly owned subsidiary, Inuvialuit Energy Security Project LTD. (IESPL), will develop the well and the Inuvialuit Energy Security Project.	Commitment	Well Workover	Corporate	Corporate - Travis	Implemented and Closed
604	30	Pg.7 Sec. 3.1	The diesel fuel above the top packer will be replaced with 1130 kg/m3 brine prior to drilling out the top plug.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
605	30	Pg.8 Sec.3.1	While the upper plug is drilled out, the well will be secured by the bridge plug located at 2650mKB.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
606	30	Pg.8 Sec.3.1	As a contingency, the BOP used in this segment will be tested to a working pressure of 35MPa.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
607	30	Pg.8 Sec.3.2	The diesel fuel from 2094mKB will be replaced with 1130 kg/m3 brine and the well will then be circulated to blend the 1130 kg/m3 brine with the 1175 kg/m3 brine between 2650m and 2094m.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
608	30	Pg.8 Sec.3.2	The casing will be pressure tested and evaluated using electro-magnetic methods to confirm its integrity, prior to drilling out the lower plug.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
609	30	Pg.8 Sec.3.3	Once the lower plug is drilled out, the wellbore will be exposed to reservoir pressure, but as noted above, the well will be hydrostatically overbalanced by the brine column. As a contingency, the BOP will have been tested to 35MPa with the 88 mm workstring.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
610	30	Pg.8 Sec.3.3	A trip sheet will be maintained while tripping out, to ensure that the well is neither flowing, or losing excess fluid to the formation, reducing the hydrostatic head.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
611	30	Pg.8 Sec.3.3	The permanent packer will be run on wireline using a lubricator, to provide secondary well control while running. Again, the hole will be maintained full, to account for possible surge effects while running the packer.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
612	30	Pg.8 Sec.3.4	Four strings of capillary tubing will be run on the outside of the tubing, meaning that the annular preventer will be the BOP used (pipe rams will damage the capillary).	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
613	30	Pg.8 Sec.3.4	The actuating pressure of the annular pressure will be reduced to minimize the risk of damage to capillary should it be closed.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
614	30	Pg.9 Sec.3.5	Once the tubing is stabbed into the packer and the tubing hanger landed, the wellhead will be installed, and pressure tested. Only after a successful pressure test will the ceramic disk be sheared out with pressure, establishing connection to the existing perforations and the formation. The well will then be ready for cleanup and testing.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
615	30	Pg.9 Sec.3.6	When all the well components are installed, the well will be flowed back to clean up any completion brine and debris that may have entered the formation and confirm the anticipated production rates.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
616	30	Pg.9 Sec.3.7	At the completion of testing, the well will be shut-in, the master valves closed and locked, and the control pressure to the SSSV bled off allowing it to close.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
617	30	Pg.10 Sec.7	A wellhead technician will be on site to assist with installation.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
618	30	Pg.10 Sec.7.d)	These connections will be pressure tested to 1400 kPa and 35 MPa once the service rig is available.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
619	30	Pg.14 Sec.22	Diesel may be hauled to industrial waste heat boilers in Tuktoyaktuk or Inuvik (if suitable). Otherwise it will be hauled to approved disposal location in BC or Alberta.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned
620	30	Pg.21 Sec.71	Waste brine/produced water will be trucked to an approved disposal well.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned
621	30	Pg.21 Sec.72	Recovered diesel and condensate from the flowback may be repurposed in local waste oil burners. If not possible, this fluid will also be trucked to a disposal well.	Commitment	Well Workover	Waste	Environmental - Alan	Planned
622	31	Pg. 9 Sec.1.3	During WW, IESPL will provide our Safety Plan, (...) to our contractors.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
623	31	Pg. 9 Sec.1.3	During WW, IESPL will provide our Environmental Protection Plan, (...) to our contractors.	Commitment	Well Workover	Environmental Mgmt	Environmental - Alan	Planned

624	31	Pg. 9 Sec.1.3	During WW, IESPL will provide our (...) Emergency Response Plan to our contractors.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Planned
625	31	Pg. 9 Sec.1.3	IESPL will ensure that the various operations and activities of contractors and sub-contractors will meet or exceed the safety, environmental and contingency requirements of the regulators and IESPL, including necessary training or certification.	Commitment	Well Workover	Training and Capacity Building	Regulatory Group - Alan	Planned
626	31	Pg. 9 Sec.1.3	Quality Control of the WW scope of work will be contracted to and supervised by Heenan Energy Services.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
627	31	Pg.11 Sec.1.4	A gas processing plant (the "IESP Energy Centre") will be built near the M-18 well to produce Propane, Liquid Natural Gas (LNG) Compressed Natural Gas (CNG), and Synthetic Diesel. Commissioning of the IESP Energy Centre is currently planned for 2026.	Commitment	Well Workover	Energy Centre	Corporate - Travis	Planned
628	31	Pg.12 Sec.1.4	This Operations Authorization (OA) Application is intended for the well-workover phase of the project. OA applications for the construction, installation, commissioning, and operation of the IESP Energy Centre will be submitted at a later date when engineering design is further advanced.	Commitment	Well Workover	Other	Corporate - Travis	Implemented and Closed
629	31	Pg.20 Sec.2.4	IESPL will apply for a Right to Access Land from the Inuvialuit Land-Administration (ILA) for a Land Use Permit to cover the activities of the well-workover scope of work 3 months before the commencement of work.	Commitment	Well Workover	Environmental Mgmt	Environmental - Alan	Implemented and Closed
630	31	Pg.21 Sec.2.5	The stream crossing will be constructed during the winter while the creek is completely frozen so it will not require temporary cofferdams or diversions	Commitment	Well Workover	Traffic	Environmental - Alan	Implemented and Closed
631	31	Pg.22 Sec.2.7	IESPL have continued and will continue engagement throughout the planning, construction, commissioning, operations, and decommissioning phases of the IESP.	Commitment	Well Workover	Community	Community Relations - Verna	Planned
632	31	Pg.23 Sec.2.10	IESPL will ensure that: • The equipment that is to be used in the WW activities will be fit for the purposes for the work it is to be used.	Commitment	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
633	31	Pg.23 Sec.2.10	IESPL will ensure that: • The related operating procedures and site-specific procedures are appropriate.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
634	31	Pg.23 Sec.2.10	IESPL will ensure that: • The personnel who are to be employed in connection with the 2023 WW scope of work are qualified and competent for the task required of them.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
635	31	Pg.23 Sec.2.10	IESPL will ensure that: • IESPL staff and contractors engaged in the supervision of this work will have suitable experience. Supervisory personnel will have, as a minimum, current Energy Safety Canada Well Service Blowout Prevention, H2S Alive, Standard First Aid (or equivalent), WHMIS & TDG, and Incident Command System (ICS) Training	Commitment	Well Workover	Training and Capacity Building	Completions Engineer - Dick	Planned
636	31	Pg.24 Sec.3.2	All elements of the IMS will be reviewed, tested and functional 4 weeks prior to initiation of the work scope. The IMS is a "living" system that will be regularly audited and reviewed.	Commitment	Well Workover	IMS - Sharepoint	IMS - Alan	Planned
637	31	Pg.25 Sec.3.3	We will CHECK on the effectiveness of our implementation through regular reporting, monitoring, audits, and management review.	Commitment	Well Workover	Reporting	Senior Management Team	Planned
638	31	Pg.25 Sec.3.3	Finally, we will ACT on the results of our checking using a standardized management of change process and an adaptive approach to continual improvement to reflect changing site conditions, activity levels, lessons learned and/or corrective actions.	Commitment	Well Workover	Other	Senior Management Team	Planned
639	31	Pg.26 Sec.3.4	IESPL will ensure that all its contractors are aware of the WW scope of work, activities, and associated hazards, and that they agree to abide by all IESPL environmental, safety and emergency management systems and plans specific to the work.	Commitment	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
640	31	Pg.26 Sec.3.4	IESPL will pre-qualify all contractors and sub-contractors to ensure systems and processes are in place to comply with the IESPL Management Plans.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
641	31	Pg.26 Sec.3.4	IESPL will ensure various IESP plans, and procedures are operating effectively through assessment and monitoring of contractor training and orientations, competency, adequate levels of supervision, communications, documentation, reporting, and management of change.	Commitment	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
642	31	Pg.26 Sec.3.4	IESPL will retain the right of approval over all personnel, contractors, and sub-contractors on site and for their removal and replacement if necessary.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
643	31	Pg.31 Sec.3.7	For the purposes of the Well Workover operation, IESP will utilize those portions of the IMS which correspond to the size, nature and complexity of the WW activities, hazards, and associated risks.	Commitment	Well Workover	IMS - Sharepoint	IMS - Alan	Planned
644	31	Pg.31 Sec.3.7	IESP have used and will continue to use the Aspect Map to inform the assessment of risks, opportunities, potential impacts, and hazards	Commitment	Well Workover	IMS - Sharepoint	IMS - Alan	Planned



645	31	Pg.31 Sec.3.7	Onsite operations are performed under the direction of a specialized onsite completions and workover supervisor contracted by IESPL. All services on site will report directly to him, including the service rig, flowback/testing equipment, wireline operators and various specialist technicians.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
646	31	Pg.31 Sec.3.7	Where one entity has numerous employees (e.g., the service rig contractor) they will have their own internal structure.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
647	31	Pg.31 Sec.3.7	The onsite supervisor will report to the workover engineer on a daily basis, and additionally as required.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
648	31	Pg.31 Sec.3.7	The operational details of the workover program will be submitted with the Application for Authorization to Alter the Condition of a Well.	Commitment	Well Workover	M-18 Well	Completions Engineer—Dick	Implemented and Closed
649	31	Pg.31 Sec.3.7	Any required deviations from the AACW or the OA will be discussed with and approved by the workover engineer. The workover engineer reports to the Project Manager. The Project Manager will review the planned workover program and any significant deviations from it. The rationale behind these deviations (if any) will be documented.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
650	31	Pg.33 Sec.4.0	As per the NWT Safety Act, IESPL shall be acting as Principal Contractor during the WW phase of the IESP. As such, our safety programs, plans and procedures will be included in contracts, and therefore part of IESPL contractor management processes within our IMS.	Commitment	Well Workover	Jobs and Contracts	Corporate - Travis	Planned
651	31	Pg.33 Sec.4.0	IESPL will require our contractors to follow our procedures or provide procedures that meet or exceed ours.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
652	31	Pg.35 Sec.4.3	The WW Phase of the IESP will be contracted by IESPL.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
653	31	Pg.35 Sec.4.3	As such compliance monitoring shall focus specifically on contractor management.	Commitment	Well Workover	Monitors	Senior Management Team	Planned
654	31	Pg.35 Sec.4.3	IESPL shall be reviewing, tasking, meeting objectives, verifying legal compliance, and contractor hazard and risk management and incident accident tracking and management.	Commitment	Well Workover	Monitors	Senior Management Team	Planned
655	31	Pg.35 Sec.4.3	IESPL shall also be continually observing compliance for both contract and employee health and safety, by providing a representative from IESPL (the On-site Manager) to oversee the WW operations.	Commitment	Well Workover	Jobs and Contracts	Corporate - Travis	Planned
656	31	Pg.36 Table 5	Extreme Weather - Blizzard - Pre-planning for the event will have all the workover activities occur during summer.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
657	31	Pg.37 Table 5	All workers will have WHMIS training and SDS on site.	Commitment	Well Workover	Training and Capacity Building	Completions Engineer - Dick	Planned
658	31	Pg.37 Table 5	The work will be completed on an accessible worksite.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
659	31	Pg.37 Table 5	Third party access shall be restricted.	Commitment	Well Workover	Traffic	Completions Engineer - Dick	Planned
660	31	Pg.37 Table 5	There will be methanol injection used for hydrate prevention and mitigation.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
661	31	Pg.38 Table 5	At each site there will be spill response kits.	Commitment	Well Workover	Spills	Environmental - Alan	Planned
662	31	Pg.38 Table 5	During work over activities an advanced care paramedic and ambulance shall be on site.	Commitment	Well Workover	Emergency Mgmt	Operations - Brent	Planned
663	31	Pg.38 Table 5	Fueling will be by fuel truck.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
664	31	Pg.38 Table 5	Drip pads will be used under equipment.	Commitment	Well Workover	Spills	Environmental - Alan	Planned
665	31	Pg.38 Table 5	All commercial drivers will have the appropriate licensing.	Commitment	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
666	31	Pg.38 Table 5	IESPL roads shall be speed controlled.	Commitment	Well Workover	Traffic	Health and Safety - Kevin	Planned
667	31	Pg.38 Table 5	Public roads shall be spot checked by IESPL safety.	Commitment	Well Workover	Traffic	Health and Safety - Kevin	Planned
668	31	Pg.38 Table 5	Drivers will have TDG Training.	Commitment	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
669	31	Pg.39 Table 5	Work will be 12-hour days only.	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
670	31	Pg.40 Sec.6.0	IESPL will use Incident Command System (ICS) for our emergency management programs, processes, and training.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
671	31	Pg.43 Sec.7.3	Following drill out of suspension plugs, confirmation of casing condition, run of new completion assembly, relatively low rates of 6 mmscf (170 e3 m3/d) of gas will be flared for a short period to clean up the well of kill fluid and establish a stabilized flow rate.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
672	31	Pg. 43 Sec.7.3	The flare stack will be approximately 12 meters in height and will be placed on a gravel pad a minimum of 50m from other equipment as per Alberta spacing requirements found in AER Directive 037 Schedule 11.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
673	31	Pg. 43 Sec.7.3	As required by the OGDPR, the well will be equipped with a subsurface safety valve (SSSV).	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
674	31	Pg. 43 Sec.7.4	During cleanup operations, a small amount of condensate is anticipated. We expect this amount will not exceed 50 m3. This, along with diesel oil circulated from the well will be collected and safely stored on site.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned

675	31	Pg. 43 Sec.7.4	It will then be trucked to Tuktoyaktuk or Inuvik for use in local waste oil burners for industrial heat. If this is not acceptable or practical, the diesel and associated condensate will be trucked to a regulated recycling or disposal location in BC or Alberta.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned
676	31	Pg.44 Sec.7.5	A service rig (anticipated to be a "Free-standing Double" with a seven-inch (7") 5000 psi (178mm/35 MPa) Class III BOP will be used for the well workover, along with flowback equipment (separator, choke, etc.) and a wireline unit.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
677	31	Pg.44 Sec.7.5	Gaseous fluid returns will be directed to the two-phase separator and the gas will be flared.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
678	31	Pg.44 Sec.7.6	OA application(s) for the construction, installation, commissioning, and operation of the IESP production installation will be submitted later when engineering design is further advanced.	Commitment	Well Workover	Other	Regulatory Group - Alan	Implemented and Closed
679	31	Pg.44 Sec.7.7	The M-18 well will be produced at very low rates compared to its deliverability. Bottomhole pressure measurements will be calculated from surface pressures and will be measured directly at least every five years.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
680	31	Pg.44 Sec.7.9	Following completion of the well workover, the control pressure on the subsurface safety valve (SSSV) will be released and the valve allowed to close.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
681	31	Pg.44 Sec.7.9	All equipment will be removed and demobilized.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
682	31	Pg.44 Sec.7.9	If an extended shut-in period is anticipated, the well will also be suspended with a downhole tubing plug.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
683	31	Pg.45 Sec.8.1	An Application for Authorization to Alter the Condition of a Well (along with supporting technical details) will be submitted under separate cover.	Commitment	Well Workover	Other	Regulatory Group - Alan	Implemented and Closed
684	31	Pg.46 Sec.9.1	Within the SharePoint site, there shall be copies of the authorization, the well approval and all other approvals as required under the regulations. Additionally, paper copies of the authorizations and approval shall be kept on site during the workover operation.	Commitment	Well Workover	IMS - Sharepoint	IMS - Alan	Planned
685	31	Pg.46 Sec.9.1	Within the SharePoint site, there shall be copies of the procedures and documents necessary to execute the work activity and to operate the installation safely without pollution. If deemed necessary, paper copies of these documents would be made available to the IESP workers.	Commitment	Well Workover	IMS - Sharepoint	IMS - Alan	Planned
686	31	Pg.46 Sec.9.2	The IESP Energy Facility will be accessible by road, off the Inuvik to Tuktoyaktuk Highway (ITH).	Commitment	Well Workover	Traffic	Environmental - Alan	Implemented and Closed
687	31	Pg.46 Sec.9.2	IESPL will have one vehicle stationed full time at the facility for evacuation and shall verify contractors shall have sufficient vehicles for evacuation.	Commitment	Well Workover	Emergency Mgmt	Operations - Brent	Planned
688	31	Pg.47 Sec.9.3	IESPL will not include drilling operations within the safety plan as the IESP will operate one well within the current design.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
689	31	Pg.47 Sec.9.3	During well workover, IESPL will ensure safe work methods are followed, including formal task hazard assessments, field level hazard assessment, safe work/hot work procedures, and Lock Out Tag-out and energy isolation.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
690	31	Pg.47 Sec.9.4	During well workover, IESPL will ensure our contractors safely manage their worker shift changes as per the regulations. A site log sheet will be followed for well site operations.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
691	31	Pg.48 Sec.9.6	...where helicopter flights are required, the operator will provide the required mandatory safety briefing.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
692	31	Pg.48 Sec.9.6	Workers travelling to Inuvik or Tuktoyaktuk will fly commercial flights and follow commercial airline requirements. Once workers arrive at either location, they will follow the Journey Management procedure and Working Alone procedures in alignment with IESPL's HASP.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
693	31	Pg.48 Sec.9.6	Workers driving to site will follow journey management and working alone procedures in alignment with IESPL procedures.	Commitment	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
694	31	Pg.48 Sec.9.7	The BOP will remain in place until a downhole packer, sub-surface safety valve (SSSV) and tubing hanger and Back Pressure Valve (BPV) are installed. At this time the BOPs will be removed and the wellhead reinstalled and pressure tested.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
695	31	Pg.48 Sec.9.7	Further details are contained in the operational program which will be submitted with the Application to Alter the Condition of a Well (AACW).	Commitment	Well Workover	Other	Regulatory Group - Alan	Implemented and Closed

696	31	Pg.49 Sec.9.9	The BOPs will be pressure tested upon installation and function tested daily.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
697	31	Pg.49 Sec.9.9	Fluid storage tanks (excluding pressure vessels and the rig tank) will be double walled as a protection against accidental damage and resulting environmental impact. As a further mitigation measure, spill containment and cleanup equipment will be on site.	<b>Commitment</b>	Well Workover	Spills	Completions Engineer - Dick	Planned
698	31	Pg.49 Sec.9.9	In the event of an uncontrolled flow, resulting in condensate "rain" beyond the lease, the well will be ignited. Equipment for this will be stored in the supervisor's trailer on site.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
699	31	Pg.49 Sec.9.9	An inventory of all equipment identified in the safety plan and the environmental protection plan will be updated after the completion of any significant modification or repair to any major component of the equipment.	<b>Commitment</b>	Well Workover	Health & Safety	Environmental - Alan	Planned
700	31	Pg.49 Sec.9.10	During the well workover, workers flown in will reside at a camp within the town of Tuktoyaktuk. Any additional construction, transportation or other maintenance personnel will also reside at these accommodations.	<b>Commitment</b>	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
701	31	Pg.49 Sec.9.10	The WW contractor shall maintain a shelter for workers to provide emergency accommodations due to blizzards.	<b>Commitment</b>	Well Workover	Emergency Mgmt	Completions Engineer - Dick	Planned
702	31	Pg.49 Sec.9.10	Transportation of workers to M-18 from Tuktoyaktuk or Inuvik shall be completed using the IESPL small duty pickup fleet or contracted pickups.	<b>Commitment</b>	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
703	31	Pg.49 Sec.9.10	A paramedic (either Primary Care Paramedic –PCP or Advanced Care Paramedic-(ACP) along with a Mobile Treatment Center (MTC)-ambulance will be on site during workover operations.	<b>Commitment</b>	Well Workover	Emergency Mgmt	Senior Management Team	Planned
704	31	Pg.49 Sec.9.10	Repair of equipment, if required, shall be managed by well workover crews.	<b>Commitment</b>	Well Workover	M-18 Well	Operations - Brent	Planned
705	31	Pg.49 Sec.9.10	The site currently has access to cell phone network. During detailed engineering, review of the communication shall be completed and if necessary, IESPL shall install additional cell towers.	<b>Commitment</b>	Well Workover	Other	Senior Management Team	Planned
706	31	Pg.50 Sec.9.11	IESPL will ensure personnel and contractors have a sufficient number of trained and competent individuals available to complete the authorized work or activities and to carry out any work or activity safely and without pollution. We will do this by: <ul style="list-style-type: none"> <li>• Clear requirements in subcontracts, including identification of roles.</li> <li>• Review of work plans.</li> <li>• Requirement of subcontractors to provide required training certificates.</li> <li>• Training and Orientation of all workers on IESP IMS and Plans.</li> </ul>	<b>Commitment</b>	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
707	31	Pg.50 Sec.9.13	Material that is not locally available (e.g., NaCl for brine formation, tubular goods etc.) will be sourced in advance and stored on location or in contractor facilities in Tuktoyaktuk if required.	<b>Commitment</b>	Well Workover	Procurement	EPCM - Brent	Planned
708	31	Pg.50 Sec.9.13	Spill containment material will be available onsite at all times.	<b>Commitment</b>	Well Workover	Spills	Environmental - Alan	Planned
709	31	Pg.50 Sec.9.14	IESPL will ensure that all chemical substances, including process fluids and diesel fuel, waste material, drilling fluid and drill cuttings generated at an installation, are handled in a way that does not create a hazard to safety or the environment.	<b>Commitment</b>	Well Workover	Waste	Completions Engineer - Dick	Planned
710	31	Pg.50 Sec.9.14	The well completions brine (NaCl) and the diesel currently in the wellbore are the two significant chemicals that will be used in the operation. Personal protective equipment (PPE) will be used to protect workers from incidental exposure to splash, mists, or dust. These materials will be stored in double walled tanks when not being actively used.	<b>Commitment</b>	Well Workover	Health & Safety	Health and Safety - Kevin	Planned
711	31	Pg.51 Sec.9.14	Safety Data Sheets (SDS) will be available on site for all chemical products being used. They will be readily available to all workers.	<b>Commitment</b>	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
712	31	Pg.51 Sec.9.15	IESPL will ensure that a work or activity ceases without delay if that work or activity: (a) endangers or is likely to endanger the safety of persons; (b) endangers or is likely to endanger the safety or integrity of the well or the installation; or (c) causes or is likely to cause pollution.	<b>Commitment</b>	Well Workover	Health & Safety	Completions Engineer - Dick	Planned
713	31	Pg.51 Sec.9.15	If the work or activity ceases, the operator shall ensure that it does not resume until it can do so safely and without pollution.	<b>Commitment</b>	Well Workover	Health & Safety	Senior Management Team	Planned
714	31	Pg.51 Sec.9.15	All personnel on site shall be empowered to call for a "time out for safety" or a "stop work" until the potential situation is investigated, and the necessary action taken.	<b>Commitment</b>	Well Workover	Health & Safety	Health and Safety - Kevin	Planned

715	31	Pg.51 Sec.10.0	IESPL will ensure that all wells, installations, equipment, and facilities are designed, constructed, tested, maintained and operated to prevent incidents and waste under the maximum load conditions that may be reasonably anticipated during an operation.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned
716	31	Pg.51 Sec.10.0	Specific design criteria and operating procedures will follow OGDPR where applicable. Where OGDPR is silent, industry practices and codes (e.g., API) and the requirements of the Alberta Energy Regulator (AER) will be used as a guide.	Commitment	Well Workover	Waste	EPCM - Brent	Planned
717	31	Pg.52 Sec.10.1	Even with this encouraging history, the wellbore will be pressure tested and the casing inspected with mechanical and/or electronic wireline tools to confirm its integrity, prior to drilling out the bottommost suspension plug.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
718	31	Pg.52 Sec.10.1	To bring the ground surface up to the same level as the new sump cap, as reclaimed in late 2021 to early 2022, approximately 2.5m of fill will be added around the wellhead. This material will be added during the winter and some settling is expected. This will be managed with the addition of more surface material.	Commitment	Well Workover	Borrow	EPCM - Brent	Planned
719	31	Pg.52 Sec.10.1	The production tubing will be 13Cr L-80 (80ksi yield medium carbon steel with 13% chromium) to provide protection from corrosion resulting from the carbon dioxide (CO2) in the produced gas.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
720	31	Pg.52 Sec.10.1	To verify the condition of the production tubing and permit monitoring of its ongoing condition, logs will be run to measure the wall thickness of the tubing (to check for any corrosion) and the tubing geometry (to provide early indication of any tubing displacement resulting from formation creep associated with permafrost melting or softening).	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
721	31	Pg.52 Sec.10.1	A baseline log will be run prior to commencing production and following the first year of continuous production. Further logs will be scheduled, depending on the results of the previous measurements, but in any case, at least every five years as per OGDPR s.25(c).	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
722	31	Pg.53 Sec.10.2	Records of maintenance, tests and inspections for the service rig, tankage, and systems critical to safety and protection of the environment, including the BOP, will be inspected, and kept on site during the well workover.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
723	31	Pg.53 Sec.10.3	IESPL will ensure that the components of an installation and well tubulars, Christmas trees and wellheads are operated in accordance with good engineering practices.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
724	31	Pg.53 Sec.10.3	As the bottomhole pressure is now known (28.55 MPa), this rating is excessive, and the tubing head will be replaced with components having a 35MPa (5000 psi) rating.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
725	31	Pg.53 Sec.10.3	Both the existing and planned wellhead components are/will be manufactured in accordance with API requirements to PSL-2.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
726	31	Pg.53 Sec.10.3	The assembled wellhead will be tested to its working pressure before being put into service.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
727	31	Pg.53 Sec.10.3	The Subsurface Safety Valve (SSSV) will be function tested prior to being put into service. And at least annually thereafter.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
728	31	Pg.53 Sec.10.3	There is 2.1% carbon dioxide (CO2) in the produced fluid, but the tubulars and wellhead are designed for this (see Section 10.1). Similarly, the SSSV and other components will also be designed for this service.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
729	31	Pg.53 Sec.10.4	IESPL will ensure that any defect in the installation, equipment, facilities and support craft that may be a hazard to safety or the environment is rectified without delay.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
730	31	Pg.53 Sec.10.4	All components required for the project will be inspected by the supplier prior to shipping to site, and again prior to installation. Installation of specialized items (e.g., SSSV and VIT) will be supervised by specialized technicians. Any material found to be unsuitable will be replaced.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
731	31	Pg.53 Sec.10.4	In the event that a defect is identified in some component or service, and operations can still continue safely, the appropriate mitigation measures will be implemented until the defect can be remedied.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
732	31	Pg.54 Sec.10.5	A well test separator will be used to "clean up" the well and recover most of any completion fluid lost to the wellbore.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
733	31	Pg.54 Sec.10.5	Prior to flowing the well, the entire wellhead and the SSSV will be installed and tested.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned

734	31	Pg.54 Sec.10.5	The maximum shut-in tubing pressure (based on the 2002 well tests) is 21 MPa and the piping and test manifold will be rated at 35 MPa or higher.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
735	31	Pg.54 Sec.10.5	The well test separator will be designed and operated in accordance with the relevant ASME codes and NWT Boilers and Pressure Vessels regulations and protected by the required Pressure Safety Valves (PSV).	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
736	31	Pg.54 Sec.10.5	The produced gas will be flared.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
737	31	Pg.54 Sec.10.5	Produced liquid hydrocarbons (if any) will be burned in a waste oil burner if suitable, otherwise they will be trucked to disposal. Produced water and/or kill fluid will be trucked to a licensed disposal location in BC or Alberta.	Commitment	Well Workover	Waste	Completions Engineer - Dick	Planned
738	31	Pg.54 Sec.10.6	Sufficient additional brine will be added as required to maintain a hydrostatic overbalance during the workover operations.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
739	31	Pg.54 Sec.10.7	IESPL will ensure that, during all well operations, reliably operating well control equipment is installed to control kicks, prevent blow-outs, and safely carry out all well activities and operations.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
740	31	Pg.54 Sec.10.7	(...) Nevertheless, IESPL will employ procedures that meet or exceed regulatory requirements and industry standards.	Commitment	Well Workover	M-18 Well	Regulatory Group - Alan	Planned
741	31	Pg.54 Sec.10.7	A Class III Blowout Preventer (BOP), rated at 35MPa (Vs the bottom hole pressure (BHP) of 28.5 MPa) will be installed prior to drilling out the top plug.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
742	31	Pg.54 Sec.10.7	The BOP will be pressure tested prior to and during installation. (The workover program will be provided with the AACW).	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
743	31	Pg.55 Sec.10.7	Once the top plug has been removed, the well will be circulated to kill weight brine and a full casing inspection and pressure test will be performed. During this process the bottom bridge plug and the BOP will form a "dual barrier" to provide redundant well control.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
744	31	Pg.55 Sec.10.7	The lower plug will be drilled out with the kill fluid and the BOP providing the "dual barrier" well control.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
745	31	Pg.55 Sec.10.7	The production packer will be set above the existing perforations and the production tubing installed. This system will be pressure tested to ensure its integrity before the BOP is removed and the wellhead reinstalled.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned
746	31	Pg.55 Sec.10.7	The service rig operator and supervisor on location will have a valid Energy Safety Canada Well Service Blowout Prevention certification (or equivalent).	Commitment	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
747	31	Pg.55 Sec.10.7	Industry standard procedures regarding BOP drills, hole fill, trip monitoring, etc. will be followed.	Commitment	Well Workover	Training and Capacity Building	Completions Engineer - Dick	Planned
748	31	Pg.55 Sec.10.8	To confirm that the casing is in acceptable condition after over 20 years it will be pressure tested to 30 MPa (50% of burst and exceeding the anticipated 28.5 MPa BHP). In addition, a mechanical and electronic inspection will be performed prior to drilling out the lower bridge plug.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
749	31	Pg.55 Sec.10.9	IESPL will ensure that the production tubing used in M-18 is designed to withstand the maximum conditions, forces and stresses that may be placed on it and to maximize recovery from the pool.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
750	31	Pg.55 Sec.10.9	Due to the temperature of the gas reservoir compared to the upper zones (in particular the permafrost region), there will be significant elongation of the production string due to thermal expansion. A locator seal assembly and seal bore extension(s) will be installed in the packer to account for this.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
751	31	Pg.56 Sec.10.9	Due to concerns that over the life of the well, the warmer produced fluids could cause melting of the permafrost in the upper +/- 365 meters of the wellbore vacuum insulated tubing (VIT) will be installed in the top +/- 400m.	Commitment	Well Workover	M-18 Well	EPCM - Brent	Planned
752	31	Pg.56 Sec.10.10	With respect to monitoring and alarms, the location will be manned at all times when the wellbore is open. Prior to personnel leaving the location, the well will be secured using industry standard protocols.	Commitment	Well Workover	Monitors	Completions Engineer - Dick	Planned
753	31	Pg.56 Sec.10.11	The well will be completed as a single zone gas well, producing from the Kamik formation.	Commitment	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
754	31	Pg.56 Sec.10.11	As per the details provided in other sections of this application and to be provided in the AACW, IESPL will ensure that the workover will be performed safely.	Commitment	Well Workover	Health & Safety	Senior Management Team	Planned
755	31	Pg.56 Sec.10.11	A cleanup (flow period) is planned to recover any kill fluid lost to the formation during operations, during which time the gas will be flared.	Commitment	Well Workover	M-18 Well	Operations - Brent	Planned

756	31	Pg.56 Sec.10.11	The condensate will be trucked to Inuvik or Tuktoyaktuk and used in a waste oil burner for local heating or be trucked to a disposal/reclamation site in BC or Alberta.	<b>Commitment</b>	Well Workover	Waste	Completions Engineer - Dick	Planned
757	31	Pg.56 Sec.10.11	As will be detailed in the AACW, a packer will be set as close as practical above the topmost existing perforation in the wellbore. The packer/annulus, tubing, and wellhead will be pressure tested upon completion of the installation.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
758	31	Pg.56 Sec.10.12	A subsurface safety valve (SSSV) will be installed below the VIT at approximately 500mKB.	<b>Commitment</b>	Well Workover	M-18 Well	EPCM - Brent	Planned
759	31	Pg.57 Sec.10.13	IESPL will ensure that the wellhead and Christmas tree equipment, including valves, are designed to operate safely and efficiently under the maximum load conditions anticipated during the life of the well.	<b>Commitment</b>	Well Workover	M-18 Well	EPCM - Brent	Planned
760	31	Pg.57 Sec.10.13	Both the existing and planned wellhead components are/will be manufactured in accordance with API requirements to PSL-2.	<b>Commitment</b>	Well Workover	M-18 Well	EPCM - Brent	Planned
761	31	Pg.57 Sec.10.13	The assembled wellhead will be tested to its working pressure before being put into service.	<b>Commitment</b>	Well Workover	M-18 Well	Operations - Brent	Planned
762	31	Pg.57 Sec.10.13	Since the ground surrounding the wellhead will be raised approximately 2.4m, the wellhead will have to be similarly raised. This will be done by installing several spools between the intermediate spool and the (now raised) tubing spool). These will be 35 MPa X 280 mm (11" X 5000#) but will contain guide to facilitate passage of the packer and workover tools.	<b>Commitment</b>	Well Workover	M-18 Well	EPCM - Brent	Planned
763	31	Pg.57 Sec.10.13	All components will be pressure tested to 35 MPa.	<b>Commitment</b>	Well Workover	M-18 Well	Operations - Brent	Planned
764	31	Pg.57 Sec.10.13	There is 2.4% carbon dioxide (CO2) in the produced fluid, but the tubulars and wellhead are designed for this (see Section 10.1). Similarly, the SSSV and other components will also be designed for this service.	<b>Commitment</b>	Well Workover	M-18 Well	EPCM - Brent	Planned
765	31	Pg.58 Sec.11.1	Routine sampling will be included during production operations, as required.	<b>Commitment</b>	Well Workover	M-18 Well	Operations - Brent	Planned
766	31	Pg.58 Sec.11.3	During the cleanup phase of the workover, the volume of fluids produced (gas, water, and condensate) will be recorded in compliance with OGDPR 60(1)(a).	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
767	31	Pg.58 Sec.11.3	The volumes of gas flared, and liquids transported (if any) will be recorded as per OGDPR 60(1)(c).	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
768	31	Pg.58 Sec.11.3	Section 60 of the OGDPR as it relates to production operations, will be addressed in the OA application for the IESP Energy Facility at a later date	<b>Commitment</b>	Well Workover	Other	Regulatory Group - Alan	Planned
769	31	Pg.58 Sec.11.4	Section 62 of the OGDPR relates to production operations and will be addressed in the OA application for the IESP Energy Facility at a later date. Testing and related operations specific to the workover (e.g., BOP and SSSV testing) will be detailed in the AACW.	<b>Commitment</b>	Well Workover	M-18 Well	Regulatory Group - Alan	Planned
770	31	Pg.59 Sec.12.1	The M-18 well will be produced at very low flow rates (6 mmscf/d - 170 e3 m3/d) due to limited local demand and lack of export infrastructure.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	No Longer Applicable
771	31	Pg.60 Sec.13.0	IESPL will ensure that all personnel have, before assuming their duties, the necessary experience, training, and qualifications and are able to conduct their duties safely, competently and in compliance with IESPL requirements and the OGOA regulations.	<b>Commitment</b>	Well Workover	Training and Capacity Building	Training and Development - Alan	Planned
772	31	Pg.60 Sec.13.0	Records of the experience, training and qualifications of all personnel will be kept and made available to the Regulator upon request.	<b>Commitment</b>	Well Workover	Jobs and Contracts	Human Resources -Travis	Planned
773	31	Pg.60 Sec.13.0	An experienced Wellsite Supervisor will be contracted by IESPL to supervise on-site operations under the direction of a professional engineer registered in the NWT.	<b>Commitment</b>	Well Workover	Jobs and Contracts	Corporate - Travis	Planned
774	31	Pg.60 Sec.13.0	The supervisor will have current Energy Safety Canada Well Service Blowout Prevention or equivalent and current certification in H2S Alive and Intermediate First Aid (Standard First Aid or better).	<b>Commitment</b>	Well Workover	Training and Capacity Building	Human Resources -Travis	Planned
775	31	Pg.60 Sec.13.0	Specialist personnel (e.g., wireline logging, downhole tools, etc.) will be qualified in their respective specialties by their employer.	<b>Commitment</b>	Well Workover	Jobs and Contracts	Corporate - Travis	Planned
776	31	Pg.60 Sec.13.0	On-site safety meetings will be held prior to each new phase of the operation to ensure all parties understand the general scope and their responsibilities in the operation.	<b>Commitment</b>	Well Workover	Health & Safety	Health and Safety - Kevin	Planned

777	31	Pg.60 Sec.13.0	On site drills including “man down” and “blowout drill” will be held to ensure personnel are with the necessary emergency procedures. An ICS table-top exercise will be held at least one month prior to commencement of the WW.	<b>Commitment</b>	Well Workover	Emergency Mgmt	Senior Management Team	Planned
778	31	Pg.60 Sec.13.0	In addition to the First Aid requirements under the Oil & Gas Occupational Safety Regulations, a Mobile Treatment Center (MTC) (ambulance) and a paramedic attendant will be on site.	<b>Commitment</b>	Well Workover	Emergency Mgmt	Senior Management Team	Planned
779	31	Pg.61 Sec.14.1	IESPL will ensure that the CER is notified of any incident or near-miss as soon as the circumstances permit; and, the Regulator is notified at least 24 hours in advance of any press release or press conference held by the operator concerning any incident or near-miss during any activity to which the regulations apply, except in an emergency situation, in which case IESPL will notify without delay before the press release or press conference.	<b>Commitment</b>	Well Workover	Reporting	Regulatory Group - Alan	Planned
780	31	Pg.62 Sec.14.2	IESPL will submit data from the workover operations as required by OGDPR 76 (1) and (2).	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
781	31	Pg.62 Sec.14.2	Records will be kept of personnel arriving and leaving the location during the workover operation. Refer to IESP-HSSE-OHS-PR-139 Sign In Requirements.	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
782	31	Pg.62 Sec.14.2	The location and movement of support craft, the emergency drills and exercises, incidents, near-misses, the quantities of consumable substances that are required to ensure the safety of operations and other observations and information critical to the safety of persons on the installation or the protection of the environment, or the prevention of waste, will be recorded on the daily record of operations (“Tour Sheets”). These will be submitted at the end of operations in the final well report.	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
783	31	Pg.63 Sec.14.3	A record of daily operations will be kept in the “Tour Book” onsite and summarized in the Daily Report. These reports will be available onsite during operations and submitted to the regulator upon completion of the project.	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
784	31	Pg.63 Sec.14.4	The well will be flowed to cleanup any completion brine lost to the formation during operations. Records of the gas flowed, and fluids produced will be submitted upon completion of the workover and testing operation.	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
785	31	Pg.63 Sec.14.5	A daily report of workover operations will be submitted to the regulator.	<b>Commitment</b>	Well Workover	Reporting	Operations - Brent	Planned
786	31	Pg.63 Sec.14.6	IESPL will ensure that, not later than March 31 of each year, an annual environmental report relating to the preceding year is submitted to the Regulator and include a summary of environmental protection matters during the year, including a summary of any incidents that may have an environmental impact, discharges that occurred and waste material that was produced, a discussion of efforts undertaken to reduce pollution and waste material and a description of environmental contingency plan exercises.	<b>Commitment</b>	Well Workover	Reporting	Regulatory Group - Alan	Planned
787	31	Pg.64 Sec.14.6	IESPL will ensure that, not later than March 31 of each year, an annual safety report relating to the preceding year is submitted to the Regulator and includes a summary of lost or restricted workday injuries, minor injuries and safety-related incidents and near-misses that have occurred during the preceding year; and a discussion of efforts undertaken to improve safety.	<b>Commitment</b>	Well Workover	Reporting	Regulatory Group - Alan	Planned
788	32	Sec.3.0	All of these items will be provided by third party contractors during the Well Workover.	<b>Commitment</b>	Well Workover	Environmental Mgmt	Regulatory Group - Alan	Planned
789	32	Sec.3.0	All will be visually inspected prior to and during rig up and daily thereafter (during daily “walkaround inspection”).	<b>Commitment</b>	Well Workover	Reporting	Completions Engineer - Dick	Planned
790	32	Sec.3.0	The “walkaround inspection” will be documented in the daily report.	<b>Commitment</b>	Well Workover	Reporting	Completions Engineer - Dick	Planned
791	32	Sec.3.1	The BOP (and associated components) will be designed, maintained, and tested in accordance with the Oil and Gas Drilling and Production Regulations (OGDPR) section 37, CAOEC (formally CAODC) Recommended Practice 7.0, and the Alberta Energy Regulator’s Directive 037 – Service Rig Inspection manual.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
792	32	Sec.3.1	The BOP will be pressure tested prior to and after installation.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
793	32	Sec.3.1	The accumulator system will be tested after installation of the BOP and prior to drilling out of the existing wellbore plug(s).	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned



794	32	Sec.3.1	The BOP will be function tested daily and the results recorded in the tour book.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
795	32	Sec.3.1	Procedures for the above will be included in the Workover Program to be supplied to the on-site supervisor.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
796	32	Sec.3.2	As above, the service rig and its components will be visually inspected as part of the CAOEC Service Rig Inspection.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
797	32	Sec.3.2	The service rig components will be maintained in accordance with the CAOEC Recommended Practices 3.0, 3.-A, and 4.0.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
798	32	Sec.3.2	A CAOEC Rig Inspection will be performed after rigging up the service rig and prior to the commencement of rig operations.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
799	32	Sec.3.3	The BOPs associated with wireline operations will be tested and operated in accordance with OGDPR 37 and Energy Safety Canada IRP 13.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
800	32	Sec.3.3	Wireline BOPs and lubricator connections will be pressure tested prior to any situation where they will be exposed to wellbore pressure.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
801	32	Sec.3.5	Brine prepared for displacement into the well, diesel fuel circulated out of the well and produced fluids during testing will be stored in "200 barrel" tanks.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
802	32	Sec.3.5	• Tanks and associated piping will be visually inspected before and after installation and during daily use.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
803	32	Sec.3.5	• Storage tanks will be double walled design or placed in an impermeable berm containment enclosure. The enclosure (if used) will be sized to contain the volume of the largest tank plus 10% of the aggregate volume of the other tanks in the berm.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
804	32	Sec.3.6	A spill response trailer or sea container will be available on-site during the well workover. The equipment will be customized for a worst-case scenario (loss of well control) and will include equipment recommended by: • Crown-Indian and Northern Affairs Canada (CIRNAC) Guidelines for Spill Contingency Planning • Department of Infrastructure of the Government of the Northwest Territories (GNWT-INF) for the proposed Geotechnical Investigations for the Great Bear River Bridge (the Project) • Western Canada Spill Services (WCSS) • Can-Ross Environmental Services Ltd Spill Response Trailer Contents • Prior Arctic Drilling Operations Spill Contingency Plan	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
805	32	Sec.3.6	<del>The finalized equipment list will be available 90 days prior to project commencement. A "typical equipment list" was provided in the IESP Emergency-Response Plan.</del>	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Implemented and Closed
806	32	Sec.5.4	A combination oxygen scavenger and filming corrosion inhibitor such as Di-corp Corinox™ will be used. This product was chosen due to a long and successful history of corrosion protection in downhole applications.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
807	32	Sec.5.5	• Diesel fuel is not used as part of the planned operations, but the volume of diesel fuel previously left in the wellbore during suspension will be circulated out and disposed of to a licensed facility.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned
808	32	Attachment 2 Sec.4.3	• The area to be utilized for the well workover will be integrated with the new sump cap, to minimize the gravel footprint and the area to be cleared.	<b>Commitment</b>	Well Workover	Permafrost and Soil	Civil/Structural - KEBA	Planned
809	32	Attachment 3 Sec.6.1	This phase (following ESW) of the IESP will include the following civil works: • To provide for future well servicing and/or emergency work, a gravel pad will be built at the well site as part of the Well Workover scope and will be joined with the new sump cap to create a single pad.	<b>Commitment</b>	Well Workover	Permafrost and Soil	Civil/Structural - KEBA	Planned
810	32	Attachment 3 Sec.6.1	This phase (following ESW) of the IESP will include the following civil works: • The existing sump cap will be examined for settlement and graded and/or filled as needed.	<b>Commitment</b>	Sump Remediation	Permafrost and Soil	Civil/Structural - KEBA	Planned
811	32	Attachment 3 Sec.6.1	This phase (following ESW) of the IESP will include the following civil works: • The sump cap will be revegetated with native species, while the well servicing pad will be kept free of vegetation by non-chemical methods.	<b>Commitment</b>	Sump Remediation	Vegetation	Environmental - Alan	Planned
812	32	Attachment 5 Section 2.1 Table 1	Following workover activities, the wellhead will be re-installed, the well will be flowed to clean up any kill fluid lost to the formation, and the well will be shut-in and secured for future tie-in to the Energy Centre.	<b>Commitment</b>	Well Workover	M-18 Well	Completions Engineer - Dick	Planned



813	32	Attachment 5 Section 3.1 Table 4	All solid industrial waste generated during the well workover (e.g., cement cuttings, dunnage, tubing protectors, packing material, etc.) will be collected in waste bins and disposed of at an approved landfill.	<b>Commitment</b>	Well Workover	Waste	Completions Engineer - Dick	Planned
814	32	Attachment 5 Section 3.1 Table 4	All gas produced during the well clean- up will be flared (not vented to atmosphere).	<b>Commitment</b>	Well Workover	Air Quality	Completions Engineer - Dick	Planned
815	32	Attachment 5 Section 3.1 Table 4	At the end of operations, the waste completion brine (NaCl/water) will be hauled to disposal in the south at a regulated facility.	<b>Commitment</b>	Well Workover	Waste	Completions Engineer - Dick	Planned
816	32	Attachment 5 Section 3.1 Table 4	Sewage from the onsite lunch/office trailer(s) will be hauled to the Tuktoyaktuk sewage lagoon.	<b>Commitment</b>	Well Workover	Waste	Environmental - Alan	Planned
817	32	Attachment 5 Section 3.1 Table 4	Domestic waste will be segregated and stored in secure airtight bear proof containers and transported to an approved landfill for disposal.	<b>Commitment</b>	Well Workover	Waste	Environmental - Alan	Planned
818	32	Attachment 5 Section 3.1 Table 4	All spills will be cleaned up and disposed per the Spill Contingency Plan.	<b>Commitment</b>	Well Workover	Spills	Environmental - Alan	Planned
819	32	Attachment 5 Section 3.1 Table 4	Waste fluids from the workover will consist of spent diesel fuel circulated from the wellbore. If practical, this will be burned in industrial waste heating units in Tuktoyaktuk or Inuvik. If this is not practical, the waste diesel will be trucked to a disposal/recycling location in BC or Alberta, along with waste completion brine (NaCl/water).	<b>Commitment</b>	Well Workover	Waste	Completions Engineer - Dick	Planned
820	32	Attachment 6 Section 6.1	This phase (following ESW) of the IESP will include the following civil works that could result in erosion or sedimentation impacts: • To provide for future well servicing and/or emergency work, a gravel pad will be built at the well site as part of the Well Workover scope and will be joined with the new sump cap to create a single pad.	<b>Commitment</b>	Well Workover	Drainage	Civil/Structural - KEBA	Planned
821	32	Attachment 6 Section 6.1	This phase (following ESW) of the IESP will include the following civil works that could result in erosion or sedimentation impacts: • The existing sump cap will be examined for settlement and graded and/or filled as needed.	<b>Commitment</b>	Sump Remediation	Drainage	Civil/Structural - KEBA	Planned
822	32	Attachment 6 Section 6.1	This phase (following ESW) of the IESP will include the following civil works that could result in erosion or sedimentation impacts: • The sump cap will be revegetated with native species, while the well servicing pad will be kept free of vegetation by non-chemical methods.	<b>Commitment</b>	Sump Remediation	Vegetation	Environmental - Alan	Planned
823	33	Section 3.0	Specific equipment critical to environmental protection during Well Workover include the following: • The blowout prevention system (BOP) of the service rig • The service rig hoisting equipment • The wireline units (specifically the BOP associated with this equipment) • The well testing equipment (separator) • Fluid storage ("200 barrel" tanks) • Spill Response Trailer and Equipment All of these items will be provided by third party contractors during the Well Workover. All will be visually inspected prior to and during rig up and daily thereafter (during daily "walkaround inspection").	<b>Commitment</b>	Well Workover	Environmental Mgmt	Completions Engineer - Dick	Planned
824	33	Section 3.0	The "walkaround inspection" will be documented in the daily report.	<b>Commitment</b>	Well Workover	Reporting	Completions Engineer - Dick	Planned
825	33	Section 7.0	Compliance monitoring will include hand-held ambient monitoring at various distances downwind from the flare stack (500m, 1km and at the ITH intersection). We will also have a meteorology station for wind speed and direction.	<b>Commitment</b>	Well Workover	Monitors	Environmental - Alan	Planned
END OF DOCUMENT TO DATE								

## Inuvialuit Energy Security Project

### Summary of Conditions from Well Workover Letter Decision and related submissions

Updated: 2023-12-14

Submitted to CER 2023-12-14

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead by	Progress Status
826	29	Page 2 Para.3	The Commission reminds IESPL that it must also obtain a well approval pursuant to section 10 of the Northwest Territories' Oil and Gas Drilling and Production Regulations before it can drill, re-enter, work over, complete, or recomple the well.	Condition	Well Workover	Corporate	Corporate - Travis	Planned
827	29	Appendix 1 Pg. 1 Para. 2	Where a condition requires a filing for Commission approval, IESPL must not commence the indicated activity until the Commission issues its written approval of that filing.	Condition	Well Workover	Other	Civil/Structural - KEBA	Planned
828	29	Appendix 1 Pg. 1 Sec. 1	IESPL must comply with all of the conditions contained in this Authorization for the Well Workover unless the Commission otherwise directs or, where appropriate, an authorization or exemption is granted pursuant to subsection 54(1) of the Northwest Territories' Oil and Gas Operations Act.	Condition	Well Workover	Other	Corporate - Travis	Planned
829	29	Appendix 1 Pg. 1 Sec. 2	IESPL must cause the approved Well Workover to be designed, located, constructed, and operated in accordance with the specifications, standards, commitments made, and other information referred to in the application for authorization for the Well Workover and related submissions.	Condition	Well Workover	Other	EPCM - Brent	Planned
830	29	Appendix 1 Page 1 Sec. 3	IESPL must implement or cause to be implemented all of the policies, practices, programs, mitigation measures, recommendations, procedures, and its commitments for the protection of the environment included or referred to in the application for authorization for the Well Workover and related submissions.	Condition	Well Workover	Environmental Mgmt	Environmental - Alan	Planned
831	29	Appendix 1 Pg.2 Sec.5	IESPL must file with the CER, at least 90 days prior to commencing Well Workover construction, updated copies of the following documents specifically reflecting the Well Workover: a) Contractor Management Procedure; b) Incident Accident Reporting and Management Procedure; c) Emergency Response Plan; and d) Field operating guides for emergency response	Condition	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
832	29	Appendix 1 Pg. 2 Sec. 6:	IESPL must file with the CER, at least 90 days prior to commencing Well Workover construction, the following documents: a) Ambient Air (Dust) Monitoring Procedure; b) Noise Monitoring Procedure; c) Digital Light Intensity Monitoring Procedure; d) Wildlife Sighting Reporting Procedure; e) Bear Den Screening Procedure; f) Ground Temperature Monitoring Procedure; g) Driver Monitoring Procedure; and h) Land User Interaction Reporting Procedure.	Condition	Well Workover	Monitors	Environmental - Alan	Implemented and Closed
833	29	Appendix 1 Pg. 2 Sec. 7:	IESPL must file with the CER, at least 90 days before Well Workover construction: a) for approval, a final, executed copy of the parental guarantee, in the amount and substantively in the final form submitted by IESPL on the MH-002-2022 hearing record, as proof of financial responsibility in relation to the Well Workover; and b) a final copy of the insurance policy or policies in relation to the Well Workover, referenced on the MH-002-2022 hearing record.	Condition	Well Workover	Corporate	Corporate - Travis	Implemented and Closed
834	29	Appendix 1 Pg. 2 Sec. 8.	IESPL must notify the CER in writing, within five business days of learning that there are, or there will be, any material changes to: a) the financial position of the guarantor that may affect IESPL's ability to address loss, damage, costs, and expenses caused by spills or debris from the Well Workover for the IESP. An example of a material change in financial position may be a significant draw of credit; b) IESPL's form of proof of financial responsibility, as filed in support of Condition 7 to this authorization, including but not limited to cancellation or amendments to the parental guarantee; c) the financial information submitted by IESPL as part of the MH-002-2022 hearing in support of its proposed form and amount of proof of financial responsibility, including material changes to relevant insurance policies; or d) IESPL's ability to continue to own and/or operate the IESP.	Condition	Well Workover	Corporate	Corporate - Travis	Planned

835	29	Appendix 1 Pg. 3 Sec. 9.	<p>IESPL must:</p> <p>a) file with the CER and post on the IESP website, at least 45 days prior to commencing Well Workover construction, a Commitment Tracking Table listing all commitments made by IESPL in the application for authorization for the Well Workover and related submissions, which includes:</p> <p>i) reference to the documentation in which each commitment appears (for example: the application and subsequent filings; responses to information requests; any permit, authorization, or approval requirements; condition filings; Environmental Impact Screening Committee decision; or other documents);</p> <p>ii) the accountable lead person for implementing each commitment; and</p> <p>iii) the estimated timeline required to fulfill each commitment.</p> <p>b) update the status of each commitment in part a) on the IESP website and file these updates with the CER, identifying the updates in a blackline version, on a quarterly basis until the end of the seventh year following the completion of Well Workover construction.</p> <p>c) maintain at IESPL's construction office(s):</p> <p>i) a current copy of the Commitment Tracking Table required in (a) above, and the status of each condition, as required in (b) above;</p> <p>ii) copies of any permits, approvals, or authorizations issued by federal, territorial, or other permitting authorities, which include environmental conditions, recommendations, or site-specific mitigation or monitoring measures; and</p> <p>iii) any subsequent changes to permits, approvals, or authorizations referenced in c) ii).</p>	Condition	Well Workover	IMS - Sharepoint	IMS - Alan	In Progress
836	29	Appendix 1 Pg. 3 Sec. 10.	<p>IESPL must file with the CER, at least 30 days prior to commencing Well Workover construction, a detailed construction schedule or schedules identifying major construction activities and must notify the CER of any modifications to the schedule or schedules as they occur.</p>	Condition	Well Workover	Reporting	EPCM - Brent	Implemented and Closed
837	29	Appendix 1 Pg. 3 Sec. 11.	<p>IESPL must file with the CER, by the 15th and the last day of each month during Well Workover construction, construction progress reports. Each report must include:</p> <p>a) information on the activities carried out during the reporting period;</p> <p>b) any environmental, socio-economic, safety, and security issues, and issues of non-compliance;</p> <p>c) the measures undertaken for the resolution of each issue identified in paragraph (b) above; and</p> <p>d) information on safety performance indicator trends, such as, but not limited to:</p> <p>i) cumulative total, and contractors', recordable injury rates and/or frequency;</p> <p>ii) total, and contractors', lost time injury rates and/or frequency,</p> <p>iii) total, and contractors', preventable motor vehicle incident rates and/or frequency, and</p> <p>iv) respective benchmarks for all safety performance indicators submitted, as set by IESPL.</p>	Condition	Well Workover	Reporting	Environmental - Alan	Planned
838	29	Appendix 1 Pg. 4 Sec. 12.	<p>IESPL must file with the CER, within 30 days after completing Well Workover construction, a confirmation that the Well Workover was completed and constructed in compliance with all applicable conditions in this Letter Decision. If compliance with any of these conditions cannot be confirmed, IESPL must file with the CER details as to why compliance cannot be confirmed. The filing required by this condition must include a statement confirming that the signatory to the filing is a responsible officer of IESPL.</p>	Condition	Well Workover	Corporate	Corporate - Travis	Planned
839	29	Appendix 1 Pg. 4 Sec. 13.	<p>IESPL must file with the CER, on or before 31 January following each of the first, third, fifth, and seventh complete growing seasons after completing final clean-up from Well Workover construction, a Post-Construction Environmental Monitoring Report that:</p> <p>a) describes the methodology used for monitoring, the criteria established for evaluating success, and the results found;</p> <p>b) identifies the issues to be monitored, including but not limited to unexpected issues that arose during construction, and their locations (for example, on a map or diagram, in a table);</p> <p>c) describes the current status of the issues (i.e., resolved or unresolved), any deviations from plans, and corrective actions undertaken;</p> <p>d) assesses the effectiveness of the mitigation measures, both planned and corrective, applied against the criteria for success;</p> <p>e) includes a detailed summary of IESPL's consultation undertaken with the appropriate territorial and federal authorities, co-management boards, and interested Indigenous Peoples; and</p> <p>f) provides proposed mitigation measures and the schedule that IESPL would implement to address ongoing issues or concerns.</p> <p>The report must include, but is not limited to, information specific to the effectiveness of mitigation measures applied to minimize effects on: soil (erosion and sedimentation), permafrost, watercourse crossings, water quality, wildlife and wildlife habitat, and wildlife species at risk and of special concern.</p>	Condition	Well Workover	Reporting	Environmental - Alan	Planned