CONTROLLED DOCUMENT

IESP Commitment Register - Well Workover Phase

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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, public announcements, public presentations, regulatory applications including impact assessments, project descriptions, the development plan or other applications; IR responses, or letters to stakeholders).

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.

As required by the CER, the Commitment Register is reviewed and submitted to the CER quarterly. The review involves an update of status of conditions and commitments. Any conditions or commitments that are implemented and closed are "blacklined" with strike-through font.

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:

https://iespca.sharepoint.com/sites/IMS/Shared%20Documents/Forms/AllItems.aspx?FolderCTID=0x012000F9EB655EB627F14DAFA144358D1DDC72&id=%2Fsites%2FIMS%2FShared%20Documents%2FRegulatory%20Compliance%2FREGISTERS&viewid=638ec7f8%2D2bb7%2D429b%2Da46c%2Dd05cf78d3310

Inuvialuit Energy Security Project

Summary of Reference Documents Relevant to Well Workover

Updated: 2025-01-14

Submitted to CER 2025-04-15

CER Source	Document Owner	File Name	Document Type	Document Title	Source Date / Revision
3	IESPL	IESP Development Plan-Part One-July 9 2021	Application	IESP Development Plan Part One	2021-07-09
5	IESPL	IESP Development Plan Part Two - Resource Management Plan 09 July 2021	Application	IESP Development Plan Part Two - Resource Management Plan	2021-07-09
6	IESPL	IESP Development Plan Part Two - Covering Letter 10 July 2021	Letter	IESP Development Plan Part Two - Covering Letter	2021-07-10
7	IPC	2021-03-10 IPC Letter to CER IESP Development Plan Application Cover Letter	Letter	IPC Development Plan Application Letter	2021-03-10
	CER	2022-03-08_C18065-1 CER Letter to GNWT-Transmission of Decision regarding IPC's application for a Development Plan for the IESP-A8C4J7	Approval	Letter Decision re: Transmission of Decision regarding IPC application for a Development Plan for the IESP (includes link to CER full document)	2022-03-08
13			Approval	CER Letter Decision	2022-03-08
15	IESP	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
17	IESP	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
18	IESP	IESP-CORP-REG-120 Application for Early Site Works OA-FINAL	Application	Application for Operations Authorization Inuvialuit Energy Security Project - Early Site Works Phase	2023-03-29
19	IESP	2023-04-07 IESPL to CER Response to IR No. 3	IR Response	Information Request Response to IR No.3 Energy Centre OA	2023-04-07
20	IESP	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
29	CER	Letter Decision (Well Workover OA)	Approval	CER Letter Decision - Well Workover OA	2023-06-28
30	IESPL	AACW	Application	IESPL Application to Alter the Condition of a Well	2023-05-19
31	IESPL	OA Application for the Well Workover	Application	Application for Operations Authorization Inuvialuit Energy Security Project - Well Workover Phase	2022-07-29
32	IESPL	IESP EPP_Rev 4.2	EPP Final	Environmental Protection Plan Revision 4.2	2023-09-05
33	IESPL	Environmental Protection Plan_REV 5.1 (003)	EPP Final (Preface Only)	Environmental Protection Plan Revision 5.1	2023-10-31
35	IESPL	C27776-1 2023-12-20 IESPL Response to CER Information Request No.1 -Condition 6 WWOA -A8V3V1	IR Response	Information Request Response to IR No.1 - Condition 6 (Well Workover OA)	2023-12-20
38	IESPL	C27997-1 2024-01-12 IESP Ltr to CER ESW Condition 14 IR2 and WW Condition Compliance - A8V7G2	Letter	IESP ESW OA Condition 14 Information Request No.2 and WW OA Condition Compliance Letter	2024-01-12
43	CER	2024-02-23 C28481-1 CER to IESPL Letter Decision AACW for the TUK M-18 well - A8W415	Letter Decision	Re: Application for a well approval in relation to the TUK M-18 well pursuant to subsection 10(1) of the Northwest Territories' Oil and Gas Drilling and Productions Regulations	2024-02-23
44	IESPL	WW OA-Condition 5-Information Request No.1 RegDocs Filing C28064	IR Response	WW OA - Condition 5 - IR No.1	2024-01-19

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Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

Submitted to CER 2025-04-15

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
Commitments relevant to ALL PHASES are provided in the ESW Commitment Register								
123	3	Sec.5.3.5 Para.3	The temperature of the gas reservoir is significantly higher (~86°C) than the surrounding ground temperature, so if left unprotected, a significant amount of heat would be transferred to the permafrost soil, causing it to thaw. To minimize the chance of this ever occurring the annulus (area between well casing and the production tubing) will be filled with a gelled fluid that will limit the heat transferred to the surrounding frozen ground. Special production tubing that is vacuum jacketed is being looked at to further protect the surroundings from heat transfer. Vacuum jacket tubing is a special configuration where the tubing contains an inner portion surrounded by a vacant space and then an outer portion. The empty space between the inner and outer portions will have all the air removed from it - creating a vacuum in that space and protecting the permafrost.	**Commitment**	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
206	3	Sec.1.5.2.2&1.5.2.3 Para.2	IPC's well completion will include nine steps: 1. Extend the wellhead to adjust for additional fill around the pad. 2. Install blowout prevention equipment. 3. Drill out existing cement and plugs. 4. Circulate the well to remove debris. 5. Install production tubing and sub-surface safety valve (SSSV). 6. Insulate gas production from the permafrost. 7. Install connections for the SSSV control line. 8. Re-install the wellhead. 9. Secure the well for future tie-in with the Energy Centre.	**Commitment**	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
208	3	Sec.4.4.2	All surface data collected will be used to update the reservoir engineering that has been used to apply for this development application. This pressure data will be used as a reservoir management tool to refine the determination of the ultimate resource potential of the reservoir and as the initial pressure to continuously monitor the pressures during the life of production of the well.	**Commitment**	Well Workover	M-18 Well	Reservoir Engineer / Geologist	Implemented and Closed
212	5	Sec.6.9	**Hypothetical case: IF** casing fails catastrophically (e.g., due to excessive permafrost deformation) then we will repair them choosing from a variety of tools and procedures. The size of the production casing in this well (178mm) combined with the low flow rate (and thus smaller tubing) facilitates many e options. **Alternatively,** If the M-18 wellbore was unrecoverable; it would be abandoned with cement plugs to seal off the gas flow and abandon the wellbore. We believe that the TUK L-09 well just northeast of M-18 could be reentered and recompleted as an alternate gas supply, as it penetrates the same producing formation within the same gas pool and is still within the Productive Acreage Block.	**Commitment**	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
221	5	Sec.6.1	**Hypothetical case: IF** while undertaking the recompletion of the M-18 well,there are problems with running the new vacuum insulated tubing, the subsurface safety valve, and the production string **THEN** Equipment will be run with a conventional service rig and wireline unit. If problems are encountered during the initial completion, the relevant equipment can be retrieved, serviced ais needed, and rerun**. Alternatively,** additional material can be brought from southern suppliers by air or by truck depending on the size and urgency of the item.	**Commitment**	Well Workover	M-18 Well	Well Engineer	No Longer Applicable
229	6	Sec.3	Several technical reports that are confidential will be submitted as described above, directly to the Secretary by email.	**Commitment**	Well Workover	Corporate	Regulatory	Implemented and Closed
230	7	Pg.2 Para.4	Intend to submit applications to CER for an Operations Authorization (OA) under Section 10 of OGOA, as well as an application to alter the condition of a well (ACW), on a future date.	**Commitment**	Well Workover	M-18 Well	Regulatory	Implemented and Closed
292	15	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

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
293	15	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	HSSE Lead	Implemented and Closed
294	15	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	Implemented and Closed
295	15	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	Implemented and Closed
296	15	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	Redundant
296	15	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	Implemented and Closed
297	15	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	Implemented and Closed
298	15	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	Implemented and Closed
299	15	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	Implemented and Closed
300	15	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	Implemented and Closed
301	15	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	Implemented and Closed
302	15	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	Implemented and Closed
358	17	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
359	17	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	Well Engineer	Implemented and Closed
360	17	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	Implemented and Closed
361	17	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	Implemented and Closed
362	17	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	HSSE Lead	Implemented and Closed
363	17	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	HSSE Lead	Implemented and Closed
364	17	Sec.2.37.c	There will be three levels of handover meetings.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
365	17	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	HSSE Lead	Implemented and Closed
366	17	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	Implemented and Closed

Inuvialuit Energy Security Project

Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

Submitted to CER 2025-04-15

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367	17	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	Implemented and Closed
368	17	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	Implemented and Closed
369	17	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	Implemented and Closed
370	17	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	Implemented and Closed
371	17	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	Implemented and Closed
372	17	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	Well Engineer	Implemented and Closed
373	17	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	Well Engineer	Implemented and Closed
374	17	Sec.2.36.a	The annular preventer will be pressure tested to 1400kPa and 7000kPa.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
375	17	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	Well Engineer	Implemented and Closed
376	17	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	Well Engineer	Implemented and Closed
377	17	Sec.2.36.c	The recommendations for Drawworks and Carriers will be applied.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
378	17	Sec.2.36.c	CAODC RP 4.0 addresses eight components of the overhead equipment. The recommmendations for the applicable items will be applied.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
379	17	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	Well Engineer	Implemented and Closed
380	17	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	Well Engineer	Implemented and Closed
381	17	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	Implemented and Closed
382	17	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	Well Engineer	Implemented and Closed
383	17	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	Implemented and Closed
384	17	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	Implemented and Closed
385	17	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	Well Engineer	Implemented and Closed
447	18	Sec.1.2	The purpose of the Early Site Works (ESW) phase of the IESP is to construct the necessary civil foundations for future phases of the IESP, except for the well pad, which will be constructed as part of the well workover phase and applied for as such in the OA Application for the Well Workover.	Commitment	Well Workover	Permafrost and Soil	Civil/Structural	Implemented and Closed
461	19	Sec.3.5.b	Once the system has been installed, a function test will be performed to ensure proper operation prior to the commencement of well cleanup and flow testing.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
462	19	Sec.3.5.b	The tubing pressure will be bled off to flare and then shut-in and monitored for buildup.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed

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520	20	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	Implemented and Closed
521	20	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	Implemented and Closed
522	20	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	Implemented and Closed
523	20	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	Implemented and Closed
524	20	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	Well Engineer	Implemented and Closed
525	20	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	Well Engineer	Implemented and Closed
526	20	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	Training and Development	Implemented and Closed
555	15	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	Implemented and Closed
557	15	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	Implemented and Closed
558	15	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	Implemented and Closed
559	15	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	Implemented and Closed
560	15	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	Well Engineer	Implemented and Closed
561	15	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	Implemented and Closed
562	15	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	Implemented and Closed
563	15	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	Implemented and Closed
564	15	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	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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
568	26	Sec.2.36.a	The annular preventer will be pressure tested to 1400kPa and 7000kPa.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
569	17	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	Well Engineer	Implemented and Closed
570	17	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	Well Engineer	Implemented and Closed
571	17	Sec.2.36.c	The recommendations for Drawworks and Carriers will be applied.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed

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572	17	Sec.2.36.c	CAODC RP 4.0 addresses eight components of the overhead equipment. The recommmendations for the applicable items will be applied.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
573	17	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	Well Engineer	Implemented and Closed
574	17	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	Well Engineer	Implemented and Closed
575	17	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	Well Engineer	Implemented and Closed
576	17	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	Implemented and Closed
577	17	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	Implemented and Closed
578	17	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	Well Engineer	Implemented and Closed
579	17	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	Implemented and Closed
580	17	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	Implemented and Closed
581	17	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	Well Engineer	Implemented and Closed
582	17	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	Well Engineer	Implemented and Closed
583	17	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	Implemented and Closed
584	17	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	Implemented and Closed
585	17	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	Well Engineer	Implemented and Closed
586	17	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	Implemented and Closed
587	17	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	Implemented and Closed
588	17	Sec.2.37.c	There will be three levels of handover meetings.	Commitment	Well Workover	Health & Safety	Well Engineer	Implemented and Closed
589	17	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	Implemented and Closed
590	17	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	Well Engineer	Implemented and Closed
591	17	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	Implemented and Closed

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592	15	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	Implemented and Closed
593	17	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	20	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	Implemented and Closed
595	20	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	Well Engineer	Implemented and Closed
596	20	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	Implemented and Closed
597	20	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	Well Engineer	Implemented and Closed
598	20	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	Well Engineer	Implemented and Closed
599	20	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	Implemented and Closed
600	20	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	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	No Longer Applicable
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	Implemented and Closed

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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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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 beready for cleanup and testing.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
617	30	Pg.10 Sec.7	A wellhead technician will be on site to assist with installation.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
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	Implemented and Closed
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	Well Engineer	Implemented and Closed
620	30	Pg.21 Sec.71	Waste brine/produced water will be trucked to an approved disposal well.	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
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	Implemented and Closed
622	31	Pg. 9 Sec.1.3	During WW, IESPL will provide our Safety Plan, (…) to our contractors.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	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	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	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	HSSE Lead	Implemented and Closed
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	Implemented and Closed

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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	Well Engineer	Implemented and Closed
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 Sharepoint	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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 Sharepoint	Implemented and Closed
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 Sharepoint	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Well Engineer	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	Well Engineer	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
653	31	Pg.35 Sec.4.3	As such compliance monitoring shall focus specifically on contractor management.	Commitment	Well Workover	Monitors	Senior Management Team	Implemented and Closed

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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	Implemented and Closed
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	Implemented and Closed
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	Well Engineer	No Longer Applicable
657	31	Pg.37 Table 5	All workers will have WHMIS training and SDS on site.	Commitment	Well Workover	Training and Capacity Building	Well Engineer	Implemented and Closed
658	31	Pg.37 Table 5	The work will be completed on an accessible worksite.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
659	31	Pg.37 Table 5	Third party access shall be restricted.	Commitment	Well Workover	Traffic	Well Engineer	Implemented and Closed
660	31	Pg.37 Table 5	There will be methanol injection used for hydrate prevention and mitigation.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
661	31	Pg.38 Table 5	At each site there will be spill response kits.	Commitment	Well Workover	Spills	Environmental	Implemented and Closed
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	Implemented and Closed
663	31	Pg.38 Table 5	Fueling will be by fuel truck.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
664	31	Pg.38 Table 5	Drip pads will be used under equipment.	Commitment	Well Workover	Spills	Environmental	Implemented and Closed
665	31	Pg.38 Table 5	All commercial drivers will have the appropriate licensing.	Commitment	Well Workover	Training and Capacity Building	Training and Development	Implemented and Closed
666	31	Pg.38 Table 5	IESPL roads shall be speed controlled.	Commitment	Well Workover	Traffic	HSSE Lead	Implemented and Closed
667	31	Pg.38 Table 5	Public roads shall be spot checked by IESPL safety.	Commitment	Well Workover	Traffic	HSSE Lead	Implemented and Closed
668	31	Pg.38 Table 5	Drivers will have TDG Training.	Commitment	Well Workover	Training and Capacity Building	Training and Development	Implemented and Closed
669	31	Pg.39 Table 5	Work will be 12-hour days only.	Commitment	Well Workover	Jobs and Contracts	Human Resources	Implemented and Closed
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 mmscfd (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	Well Engineer	No Longer Applicable
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	Well Engineer	No Longer Applicable
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Implemented and Closed
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	Well Engineer	Implemented and Closed

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
681	31	Pg.44 Sec.7.9	All equipment will be removed and demobilized.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	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 Sharepoint	Implemented and Closed
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 Sharepoint	Implemented and Closed
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	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	Implemented and Closed
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	HSSE Lead	Implemented and Closed
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	HSSE Lead	Implemented and Closed
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	HSSE Lead	Implemented and Closed
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	HSSE Lead	No Longer Applicable
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	HSSE Lead	Implemented and Closed
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	HSSE Lead	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Implemented and Closed
696	31	Pg.49 Sec.9.9	The BOPs will be pressure tested upon installation and function tested daily.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Spills	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	Environmental	Implemented and Closed
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.	Commitment	Well Workover	Jobs and Contracts	Human Resources	Implemented and Closed

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Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

Submitted to CER 2025-04-15

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
701	31	Pg.49 Sec.9.10	The WW contractor shall maintain a shelter for workers to provide emergency accommodations due to blizzards.	Commitment	Well Workover	Emergency Mgmt	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
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.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
704	31	Pg.49 Sec.9.10	Repair of equipment, if required, shall be managed by well workover crews.	Commitment	Well Workover	Other	Operations	Implemented and Closed
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.	Commitment	Well Workover	Other	Senior Management Team	No Longer Applicable
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: • Clear requirements in subcontracts, including identification of roles. • Review of work plans. • Requirement of subcontractors to provide required training certificates. • Training and Orientation of all workers on IESP IMS and Plans.	Commitment	Well Workover	Jobs and Contracts	Human Resources	Implemented and Closed
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.	Commitment	Well Workover	Procurement	Construction Contractor	Implemented and Closed
708	31	Pg.50 Sec.9.13	Spill containment material will be available onsite at all times.	Commitment	Well Workover	Spills	Environmental	Implemented and Closed
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.	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	Senior Management Team	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Implemented and Closed

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Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

Submitted to CER 2025-04-15

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
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	Construction Contractor	Implemented and Closed
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 (CO_2) in the produced gas.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
728	31	Pg.53 Sec.10.3	There is 2.1% carbon dioxide (CO_2) 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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Construction Contractor	Implemented and Closed
736	31	Pg.54 Sec.10.5	The produced gas will be flared.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed

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Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
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	Well Engineer	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Well Engineer	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed

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Summary of Commitments Relevant to Well Workover

Updated: 2025-01-14

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
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.	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
758	31	Pg.56 Sec.10.12	A subsurface safety valve (SSSV) will be installed below the VIT at approximately 500mKB.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed
761	31	Pg.57 Sec.10.13	The assembled wellhead will be tested to its working pressure before being put into service.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Construction Contractor	Implemented and Closed
763	31	Pg.57 Sec.10.13	All components will be pressure tested to 35 MPa.	Commitment	Well Workover	M-18 Well	Operations	Implemented and Closed
764	31	Pg.57 Sec.10.13	There is 2.4% carbon dioxide (CO_2) 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	Construction Contractor	Implemented and Closed
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).	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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).	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Regulatory	Implemented and Closed
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.	Commitment	Well Workover	Training and Capacity Building	Training and Development	Implemented and Closed
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.	Commitment	Well Workover	Jobs and Contracts	Human Resources	Implemented and Closed
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.	Commitment	Well Workover	Jobs and Contracts	Corporate	Implemented and Closed
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).	Commitment	Well Workover	Training and Capacity Building	Human Resources	Implemented and Closed
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.	Commitment	Well Workover	Jobs and Contracts	Corporate	Implemented and Closed
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.	Commitment	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
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.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed

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Summary of Commitments Relevant to Well Workover

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
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.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
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.	Commitment	Well Workover	Reporting	Regulatory	Implemented and Closed
780	31	Pg.62 Sec.14.2	IESPL will submit data from the workover operations as required by OGDPR 76 (1) and (2).	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
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.	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
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.	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
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.	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
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.	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
785	31	Pg.63 Sec.14.5	A daily report of workover operations will be submitted to the regulator.	Commitment	Well Workover	Reporting	Operations	Implemented and Closed
788	32	Sec.3.0	All of these items will be provided by third-party contractors during the Well Workover.	Commitment	Well Workover	Environmental Mgmt	Regulatory	Implemented and Closed
789	32	Sec.3.0	All will be visually inspected prior to and during rig up and daily thereafter (during daily "walkaround inspection").	Commitment	Well Workover	Reporting	Well Engineer	Implemented and Closed
790	32	Sec.3.0	The "walkaround inspection" will be documented in the daily report.	Commitment	Well Workover	Reporting	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
792	32	Sec.3.1	The BOP will be pressure tested prior to and after installation.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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).	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
794	32	Sec.3.1	The BOP will be function tested daily and the results recorded in the tour book.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
795	32	Sec.3.1	Procedures for the above will be included in the Workover Program to be supplied to the on-site supervisor.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed

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Updated: 2025-01-14

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	2024 Lead By	Progress Status
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
802	32	Sec.3.5	• Tanks and associated piping will be visually inspected before and after installation and during daily use.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
805	32	Sec.3.6	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.	Commitment	Well Workover	M-18 Well	Well Engineer	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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Permafrost and Soil	Civil/Structural	Implemented and Closed
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.	Commitment	Well Workover	Permafrost and Soil	Civil/Structural	Implemented and Closed
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.	Commitment	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
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.) with be collected in waste bins and disposed of at an approved landfill.	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
814	32	Attachment 5 Section 3.1 Table 4	All gas produced during the well clean- up will be flared (not vented to atmosphere).	Commitment	Well Workover	Air Quality	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Waste	Environmental	Implemented and Closed
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.	Commitment	Well Workover	Waste	Environmental	Implemented and Closed
818	32	Attachment 5 Section 3.1 Table 4	All spills will be cleaned up and disposed per the Spill Contingency Plan.	Commitment	Well Workover	Spills	Environmental	Implemented and Closed

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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).	Commitment	Well Workover	Waste	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Drainage	Civil/Structural	Implemented and Closed
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").	Commitment	Well Workover	Environmental Mgmt	Well Engineer	Implemented and Closed
824	33	Section 3.0	The "walkaround inspection" will be documented in the daily report.	Commitment	Well Workover	Reporting	Well Engineer	Implemented and Closed
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.	Commitment	Well Workover	Monitors	Environmental	Implemented and Closed
876	44	Sec.1.4 b. Para.1	Well workover contractors will be trained to and use the previously submitted Well Workover ERP in the event of an incident occurring during well workover operations.	Commitment	Well Workover	Training and Capacity Building	Training and Development	Implemented and Closed
877	44	Sec.1.4 b. Para.1	IMT members will have access to a digital, fully indexed copy of the Well Workover ERP with quick links to key sections of the ERP, allowing IMT to quickly link to specific Quick Guides and Forms applicable to the type of emergency or role. They will also be provided with hardcopy ERP excerpts or full copies of the ERP, depending on their role in the IMT or CEOC.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
878	44	Sec.1.4 b. Para.2	IESPL will identify idiosyncrasies in the ERP (such as 1-Call Alaska) to the IMT during the ICS ERP training. In addition, IESPL is aware that the Mackenzie Delta Spill Response Corp. is no longer active. We are currently in the process of meeting with the former members of the Corp. to ascertain the whereabouts and potential access to the equipment. The contact remains valid to us within this context and will be updated when we determine the best contact name.	Commitment	Well Workover	Emergency Mgmt	Senior Management Team	Implemented and Closed
	29		**Refer to Conditions Worksheet**					
	35		**Refer to Conditions Worksheet**					
	38		**Refer to Conditions Worksheet**					
END OF DOCUMENT TO DATE								

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead By (2024)	Progress Status
257	13A	Sec.6.1.2 Para.2	IPC stated that the minor water quantities required for well completion will be provided by truck from Tuktoyaktuk or Inuvik.	Condition	Well Workover	Water	Well Engineer	Implemented and Closed
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 recomplete the well.	Condition	Well Workover	Corporate	Corporate	Implemented and Closed
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	Implemented and Closed
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	Implemented and Closed
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	Construction Contractor	Implemented and Closed
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	Implemented and Closed
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	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	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	No Longer Applicable

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead By (2024)	Progress Status
839	29	Appendix 1 Pg. 4 Sec. 13.	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: a) describes the methodology used for monitoring, the criteria established for evaluating success, and the results found; 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); c) describes the current status of the issues (i.e., resolved or unresolved), any deviations from plans, and corrective actions undertaken; d) assesses the effectiveness of the mitigation measures, both planned and corrective, applied against the criteria for success; 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 f) provides proposed mitigation measures and the schedule that IESPL would implement to address ongoing issues or concerns. 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.	**Condition**	Well Workover	Reporting	Environmental	Planned
~~840~~	~~38~~	~~Para.3~~	~~In response to question 2.2, IESPL confirms that it will meet the applicable conditions of the authorization for the well workover before commencing well workover construction, including construction of the well pad and extension of the wellhead and cellar.~~	~~**Condition**~~	~~Well Workover~~	~~M-18 Well~~	~~Corporate~~	~~Implemented and Closed~~
~~841~~	~~35~~	~~Para.5~~	~~IESPL confirms that the procedure for wildlife related noise monitoring (including locations, frequency, and associated reporting) will be included in an updated Noise Sampling Procedure (reference ii).~~	~~**Condition**~~	~~Well Workover~~	~~Monitors~~	~~Environmental~~	~~No Longer Applicable~~
~~842~~	~~35~~	~~Para.6~~	~~IESPL will file a final version of the EPP once all CER information requests are complete for the project.~~	~~**Condition**~~	~~Well Workover~~	~~Environmental Mgmt~~	~~Environmental~~	~~Implemented and Closed~~
~~858~~	~~43~~	~~Pg.3 Sec.3.1~~	~~IESPL stated that the well pad surface will be raised to the same level as the new sump cap by adding approximately 2.5 metres (m) of fill around the wellhead. The fill will be placed in the winter months when the active layer of ground is frozen.~~	~~**Condition**~~	~~Well Workover~~	~~Borrow~~	~~Civil/Structural~~	~~Implemented and Closed~~
~~859~~	~~43~~	~~Pg.3 Sec.3.1~~	~~IESPL stated that it expects some settlement of additional fill, which it will manage through the addition of more surface material where required.~~	~~**Condition**~~	~~Well Workover~~	~~Borrow~~	~~Civil/Structural~~	~~Implemented and Closed~~
~~860~~	~~43~~	~~Pg.3 Sec.3.1~~	~~IESPL stated that it will displace the diesel within the well with kill weight sodium chloride brine.~~	~~**Condition**~~	~~Well Workover~~	~~M-18 Well~~	~~Well Engineer~~	~~Implemented and Closed~~
~~861~~	~~43~~	~~Pg.3 Sec.3.1~~	~~IESPL will use a tank farm of four double-walled storage tanks, each with a capacity of 31.7 cubic metres (m3), enclosed within a berm. The enclosure will have a capacity of 56 m3. Two of the storage tanks will be used for storing the sodium chloride brine prior to displacement into the well, and the remaining two storage tanks will store the diesel once it is circulated out of the well.~~	~~**Condition**~~	~~Well Workover~~	~~M-18 Well~~	~~Construction Contractor~~	~~Implemented and Closed~~
~~862~~	~~43~~	~~Pg.3 Sec.3.1~~	~~IESPL is planning a 3.5-day flow period to recover any kill fluid lost to the formation. During this time, the produced gas will be flared via an 18-m flare stack.~~	~~**Condition**~~	~~Well Workover~~	~~Air Quality~~	~~Environmental~~	~~Implemented and Closed~~
~~863~~	~~43~~	~~Pg.4 Sec.3.1~~	~~IESPL stated that if the snow begins to melt beyond the pad, then the well engineer will be contacted for direction.~~	~~**Condition**~~	~~Well Workover~~	~~Reporting~~	~~Operations~~	~~Implemented and Closed~~
~~864~~	~~43~~	~~Pg.4 Sec.3.1~~	~~IESPL stated that if any melting of the snowpack off the well pad and sump cap occurs, then the flow rate will be reduced and/or the test will be terminated.~~	~~**Condition**~~	~~Well Workover~~	~~Permafrost and Soil~~	~~Operations~~	~~Implemented and Closed~~
~~865~~	~~43~~	~~Pg.4 Sec.3.2~~	~~Through a declaration made in relation to the Well Workover Authorization application, in accordance with section 15 of the OGOA, IESPL confirmed that it will ensure that the equipment to be used will be fit for purpose, [...]~~	~~**Condition**~~	~~Well Workover~~	~~M-18 Well~~	~~Engineering~~	~~Implemented and Closed~~
~~866~~	~~43~~	~~Pg.4 Sec.3.2~~	~~[...] and the personnel employed in connection with the project will be qualified and competent for their employment~~	~~**Condition**~~	~~Well Workover~~	~~Jobs and Contracts~~	~~Human Resources~~	~~Implemented and Closed~~
~~867~~	~~43~~	~~Pg.4 Sec.3.2~~	~~IESPL further committed to ensure that all workers in the Well Workover phase of the IESP will receive training on IESPL's safety, environment, and emergency response plans and procedures.~~	~~**Condition**~~	~~Well Workover~~	~~Training and Capacity Building~~	~~Training and Development~~	~~Implemented and Closed~~

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Updated: 2025-01-14

Submitted to CER 2025-04-15

CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead By (2024)	Progress Status
868	43	Pg.4 Sec.3.2	IESPL stated that the blowout prevention system (BOP) identified for the TUK M-18 well will be inspected and certified in accordance with Canadian Association of Energy Contractors RP 7.0 – Service Rigs Well Servicing Blowout Preventer Inspection and Certification.	Condition	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
869	43	Pg.4 Sec.3.2	Further, upon installation, the BOP and associated components will be pressure tested to 1 400 kilopascal and a working pressure of 35 megapascal.	Condition	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
870	43	Pg.4-5 Sec.3.3	In the Well Approval Application, IESPL stated that it will perform a full program inspection over the casing from the current plug-back depth of 2645 m to the surface, prior to drilling the abandonment plug at that depth.	Condition	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
871	43	Pg.6 Sec.3.3	IESPL stated that if it is not possible to repair the casing damage, then the TUK M-18 well will be permanently abandoned.	Condition	Well Workover	M-18 Well	Well Engineer	Implemented and Closed
872	43	Pg.5 Sec.3.3	IESPL stated that confined space entry procedures will be followed if entry into the well cellar is needed.	Condition	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
873	43	Pg.5 Sec.3.3	IESPL filed the table of contents of its confined space entry procedure and stated that mitigation measures will include air quality testing, positive ventilation, and rescue procedures	Condition	Well Workover	Health & Safety	HSSE Lead	Implemented and Closed
874	43	Pg.6 Sec.3.3.1	The CCO notes that implementation of contingency plans that involve abandonment of the TUK M-18 Well will require an application for a new or amended well approval.	Condition	Well Workover	M-18 Well	Corporate	Implemented and Closed
875	43	Pg.6 Sec.4	The CCO reminds IESPL that if well control is lost or if safety, environmental protection, or resource conservation are at risk, section 38 of the OGDPR requires IESPL to take any action necessary to rectify the situation without delay, despite any condition to the contrary in the well approval.	Condition	Well Workover	M-18 Well	Senior Management Team	Implemented and Closed
835a	29	Appendix 1 Pg. 3 Sec. 9.	IESPL must: 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: 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); ii) the accountable lead person for implementing each commitment; and iii) the estimated timeline required to fulfill each commitment.	Condition	Well Workover	IMS - Sharepoint	IMS Sharepoint	Implemented and Closed
835b	29	Appendix 1 Pg. 3 Sec. 9.	IESPL must: 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.	Condition	Well Workover	IMS - Sharepoint	IMS Sharepoint	In Progress
835c	29	Appendix 1 Pg. 3 Sec. 9.	IESPL must: c) maintain at IESPL's construction office(s): i) a current copy of the Commitment Tracking Table required in (a) above, and the status of each condition, as required in (b) above; 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 iii) any subsequent changes to permits, approvals, or authorizations referenced in c) ii).	Condition	Well Workover	IMS - Sharepoint	IMS Sharepoint	In Progress
836	29	Appendix 1 Pg.3 Sec. 10.	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.	Condition	Well Workover	Reporting	Construction Contractor	Implemented and Closed
837	29	Appendix 1 Pg. 3 Sec. 11.	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: a) information on the activities carried out during the reporting period; b) any environmental, socio-economic, safety, and security issues, and issues of non-compliance; c) the measures undertaken for the resolution of each issue identified in paragraph (b) above; and d) information on safety performance indicator trends, such as, but not limited to: i) cumulative total, and contractors', recordable injury rates and/or frequency; ii) total, and contractors', lost time injury rates and/or frequency, iii) total, and contractors', preventable motor vehicle incident rates and/or frequency, and iv) respective benchmarks for all safety performance indicators submitted, as set by IESPL.	Condition	Well Workover	Reporting	Environmental	Implemented and Closed

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CER ID	CER Source	Section or Paragraph #	Commitment Description	Type	Phase	Aspect	Lead By (2024)	Progress Status
~~838~~	~~29~~	~~Appendix 1 Pg. 4 Sec. 12.~~	~~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.~~	~~**Condition**~~	~~Well Workover~~	~~Corporate~~	~~Corporate~~	~~Implemented and Closed~~
END OF DOCUMENT TO DATE								