

**GENERAL ORDER 2018-018**  
Section 49 *Oil and Gas Activities Act*

**Issued to:**

Predator Oil BC Ltd.  
C/O Sproule Niven Fischer Limited  
900, 140-4th Avenue SW  
Calgary Alberta T2P 3N3

**Attention: Mr. Wayne Pridham**

**Order:**

Pursuant to section 49(1)(d) of the *Oil and Gas Activities Act* (the Act), I, Patrick Smook, order that Predator Oil BC Ltd. (Predator) must:

- a) Abandon the wells on the attached Schedule A in accordance with Part 5 of the Drilling and Production Regulation no later than October 22, 2018.
- b) Abandon the wells on the attached Schedule B in accordance with Part 5 of the Drilling and Production Regulation no later than October 15, 2019.
- c) Abandon the pipelines listed on the attached Schedule C in accordance with section 11 of the Pipeline Regulation no later than October 15, 2019.
- d) Remove the facilities listed on the attached Schedule D no later than October 15, 2019.
- e) Mobilize equipment to initiate downhole abandonment work for at least one of the wells listed in Schedule A no later than October 5, 2018.
- f) Submit evidence that item “a”, ”b”, “c”, “d”, and “e” have been completed electronically to the Compliance and Enforcement mailbox at [C&E@bcogc.ca](mailto:C&E@bcogc.ca).

**Conditions:**

This order shall remain in effect until amended or terminated in whole or in part by the Commission.

**Reasons:**

I make this Order for the following reasons:

- I. Predator is the permit holder of the wells listed in Schedules A and B, facilities listed in Schedule D and pipelines listed in Schedule C.
- II. Each well listed on Schedule A is inactive pursuant to section 25 of the Drilling and Production Regulation.

- III. On June 1, 2017, the Commission approved an application to transfer application determination #s and authorizations to Predator (the “Approval”). Conditions of the Approval included the following:
1. By June 30, 2017, the permit holder must develop a Liability Management Plan to the satisfaction of the Commission. The Liability Management Plan must:
    - a. Document the work plan and schedule for the decommissioning and restoration of infrastructure associated with oil and gas activities and related activities that are owned and operated by the permit holder; and,
    - b. Document how decommissioning and restoration work will, by May 31, 2018, achieve a \$5,000,000 reduction in the deemed liability of the permit holder’s infrastructure that has been identified by the Commission under its Liability Management Rating Program as at June 2, 2017.
  2. The permit holder must implement the Liability Management Plan submitted to the Commission to (1) above.
- IV. On September 27, 2017, Predator submitted a proposed Liability Management Plan to the Commission.
- V. The Commission reviewed the proposed Liability Management Plan and found that it was not satisfactory.
- VI. On October 4, 2017, the Commission sent Predator a letter which advised that the proposed Liability Management Plan failed to meet Condition 1 of the Approval and further that the Liability Management Plan should:
- a. identify the sites where decommissioning or restoration work will be undertaken,
  - b. identify the scope of the work being undertaken at each site,
  - c. identify work schedules, and
  - d. document how decommissioning and restoration work will, by May 18, 2018 achieve the required reduction in liabilities.
- VII. By October 23, 2017, the Commission had not received a satisfactory Liability Management Plan.
- VIII. On October 23, 2017, the Commission issued General Order 2017-103 requiring that Predator:
- a. By October 31, 2017, submit a Liability Management Plan (Plan) to the satisfaction of the Commission electronically to [C&E@bcogc.ca](mailto:C&E@bcogc.ca). The Plan must:
    - i. Document the work plan and schedule for the decommissioning and restoration of infrastructure associated with oil and gas activities and related activities that are owned and operated by the permit holder; and,
    - ii. Document how decommissioning and restoration work will, by May 31, 2018, achieve a \$5,000,000 reduction in the deemed liability of Predator’s infrastructure that was identified by the Commission under its Liability Management Rating Program as at June 2, 2017.
- IX. On October 27, 2017, Predator submitted a revised Plan to the Commission.
- X. On April 20, 2018, the Commission notified Predator that its revised Plan failed to meet Condition 1 of the Approval as it did not demonstrate how Predator would achieve the required reduction in deemed liability by the required date.

- XI. On June 28, 2018, the Commission issued an order under section 30 of the Act requiring Predator to provide security in the amount of \$2,752,849. On July 19, 2018, the Commission issued a further order under section 30 of the Act requiring Predator to provide security in the amount of \$957,563. On August 2, 2018, the Commission issued a further order under section 30 of the Act requiring Predator to provide security in the amount of \$1,862,892. To date Predator has failed to provide security to the Commission in the total amount of \$5,573,304 as required by the orders dated June 28, July 19 and August 2, 2018 (collectively the "Section 30 Orders").
- XII. To date the Commission has not received a satisfactory Plan.
- XIII. I am of the opinion that Predator is not in compliance with a condition of its Approval under section 29 of the Act.
- XIV. I am of the opinion that Predator has failed to comply with the Section 30 Orders.
- XV. I am of the opinion that Predator has failed to comply with General Order 2017-103.

**Review and Appeal:**

Predator may request a review of this order under section 70 of the Act by submitting a request for review to [ogc.determinationreviews@bcogc.ca](mailto:ogc.determinationreviews@bcogc.ca).

Predator may appeal this order to the Oil and Gas Appeal Tribunal under section 72 of the Act. The process for appeals may be found at [www.ogat.gov.bc.ca](http://www.ogat.gov.bc.ca) and a notice of appeal may be sent to the Oil and Gas Appeal Tribunal at:

Oil and Gas Appeal Tribunal  
PO Box 9425 Stn Prov Govt  
Victoria, BC, V8W 9V1



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Patrick Smook  
Director, Compliance and Enforcement  
Oil and Gas Commission

DATED AT Fort St. John, in the Province of British Columbia, this 26th day of September, 2018.

General Order 2018-018 Schedule "A"

<b>WA Number</b>	<b>UWI or NTS</b>	<b>Field</b>
15153	15-27-083-19W6	WILDER
16442	13-04-083-17W6	FORT ST JOHN
11460	13-27-083-19W6	WILDER
9754	11-15-084-19W6	FORT ST JOHN
18041	08-14-084-19W6	FORT ST JOHN
17872	06-34-083-19W6	WILDER
4082	10-15-084-19W6	FORT ST JOHN
16423	05-03-083-17W6	FORT ST JOHN
10642	10-04-084-19W6	WILDER
16152	15-27-083-19W6	WILDER
8814	08-35-083-18W6	FORT ST JOHN

General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
19600	11-04-087-18W6	MONTNEY
9763	B-035-H/094-A-13	FIREWEED
18733	B-021-H/094-A-13	FIREWEED
7690	B-070-E/094-A-14	FIREWEED
4174	06-26-082-21W6	MONIAS
3392	D-011-F/094-A-13	INGA
14042	D-099-B/094-A-13	INGA
14850	16-28-082-22W6	MONIAS
3227	C-078-B/094-A-13	INGA
16117	08-32-082-20W6	MONIAS
12964	D-025-B/094-A-14	BUICK CREEK
14849	16-29-082-22W6	MONIAS
8724	D-039-E/094-A-14	BLK E-094A14_BC
22377	B-041-H/094-A-13	FIREWEED
19409	A-070-B/094-A-14	BUICK CREEK
21130	D-066-B/094-A-14	BUICK CREEK
17777	02-22-085-19W6	STODDART
17643	13-30-086-18W6	OAK_BC
233	16-08-083-18W6	FORT ST JOHN
10556	02-26-083-18W6	FORT ST JOHN
18092	05-02-083-17W6	FORT ST JOHN
4416	06-36-083-18W6	FORT ST JOHN
5355	06-31-083-17W6	FORT ST JOHN
19941	09-32-083-17W6	AIRPORT
6557	08-36-083-18W6	FORT ST JOHN
6556	08-26-083-18W6	FORT ST JOHN
12122	03-17-083-18W6	FORT ST JOHN
7100	03-28-087-18W6	MUSKRAT
12152	B-004-B/094-A-14	BUICK CREEK
2138	11-34-083-19W6	WILDER
14096	13-27-083-19W6	WILDER
16518	03-05-087-18W6	MONTNEY
11187	12-27-084-20W6	BEAR FLAT
14372	08-22-083-18W6	FORT ST JOHN
16282	09-33-083-19W6	WILDER
18495	D-087-B/094-A-14	BUICK CREEK
21817	10-15-088-19W6	BUICK CREEK

General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
4681	06-25-083-18W6	FORT ST JOHN
17821	08-14-086-19W6	STODDART
225	01-23-083-18W6	FORT ST JOHN
19942	09-01-083-17W6	FORT ST JOHN
21927	B-030-K/094-A-10	RIGEL
10530	01-13-086-19W6	STODDART
17562	01-32-082-20W6	MONIAS
11778	06-04-085-20W6	BEAR FLAT
11452	10-33-084-20W6	BEAR FLAT
3003	06-06-083-20W6	MONIAS
12410	15-28-084-20W6	BEAR FLAT
644	A-078-C/094-A-14	BUICK CREEK
86	B-023-E/094-A-14	BUICK CREEK
3374	10-06-088-18W6	RIGEL
5043	11-26-084-20W6	TWP 084-20W6_BC
17463	15-28-084-20W6	BEAR FLAT
19106	12-33-084-20W6	BEAR FLAT
4149	06-33-083-17W6	AIRPORT
12150	05-13-086-19W6	STODDART
264	C-005-C/094-A-14	BUICK CREEK
172	02-21-083-18W6	FORT ST JOHN
18093	10-27-088-19W6	BUICK CREEK
193	14-21-083-18W6	FORT ST JOHN
3728	14-33-082-17W6	HERITAGE
469	C-014-B/094-A-14	BUICK CREEK
4378	D-033-F/094-A-14	BUICK CREEK
210	06-17-083-18W6	FORT ST JOHN
9621	A-066-I/094-A-10	RIGEL
12304	C-040-A/094-A-14	BUICK CREEK
13196	C-013-B/094-A-14	BUICK CREEK
4051	06-36-083-17W6	AIRPORT
18201	16-33-083-19W6	WILDER
10048	10-33-083-17W6	AIRPORT
2441	06-21-084-20W6	BEAR FLAT
5082	14-25-083-18W6	FORT ST JOHN
6279	16-16-087-18W6	MUSKRAT
4439	07-14-084-19W6	FORT ST JOHN
4970	07-19-088-19W6	BUICK CREEK

General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
15492	13-33-082-17W6	HERITAGE
17636	15-27-086-19W6	MONTNEY
15807	01-08-083-17W6	FORT ST JOHN
34	03-14-083-18W6	FORT ST JOHN
14127	11-15-084-19W6	FORT ST JOHN
10773	14-15-083-18W6	FORT ST JOHN
9612	02-23-083-18W6	FORT ST JOHN
7698	07-12-088-17W6	RIGEL
11454	15-19-086-18W6	OAK_BC
11195	01-27-087-18W6	MUSKRAT
7420	08-27-087-18W6	MUSKRAT
17780	04-30-086-18W6	OAK_BC
17805	08-30-086-18W6	OAK_BC
2352	07-16-084-20W6	BEAR FLAT
216	09-23-083-18W6	FORT ST JOHN
7096	05-29-084-18W6	EAGLE
9455	02-12-086-19W6	STODDART
10381	12-12-086-19W6	STODDART
20025	B-061-C/094-H-04	NIG CREEK
20100	D-044-C/094-A-14	BUICK CREEK
20488	14-24-088-20W6	BUICK CREEK
10232	10-36-088-19W6	BUICK CREEK
6709	06-15-086-20W6	STODDART
14187	15-32-082-17W6	FORT ST JOHN
16308	10-31-082-17W6	FORT ST JOHN
14840	A-007-A/094-H-08	CHINCHAGA RIVER
16360	D-095-A/094-H-03	PICKELL
18112	A-083-A/094-H-03	PICKELL
19944	D-084-A/094-H-03	PICKELL
19951	C-072-A/094-H-03	PICKELL
19968	D-064-A/094-H-03	PICKELL
3535	B-010-G/094-A-13	FIREWEED
8681	09-25-086-19W6	MONTNEY
8278	13-30-086-18W6	MONTNEY
14117	11-15-084-19W6	FORT ST JOHN
9948	05-28-088-17W6	RIGEL
20023	B-021-H/094-A-13	FIREWEED
14210	D-075-A/094-A-13	FIREWEED

General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
20024	B-061-C/094-H-04	NIG CREEK
18154	07-04-084-19W6	WILDER
4468	06-15-087-20W6	STODDART
13650	08-19-083-19W6	WILDER
13804	06-31-085-18W6	STODDART
18732	D-024-E/094-A-14	BUICK CREEK
11551	15-28-084-20W6	BEAR FLAT
13907	09-30-085-18W6	STODDART
20708	A-070-D/094-A-14	FIREWEED
6494	D-067-A/094-A-15	BEAVERTAIL
17461	A-029-L/094-A-14	BUICK CREEK
7718	A-005-B/094-A-13	INGA
14012	A-077-A/094-A-13	FIREWEED
3538	C-016-H/094-A-13	FIREWEED
7482	A-047-B/094-A-13	INGA
4354	D-051-A/094-H-03	FIREBIRD
6268	D-023-E/094-H-02	FIREBIRD
4558	07-34-082-21W6	MONIAS
4053	10-35-081-15W6	PARKLAND_BC
697	11-17-083-19W6	WILDER
6979	16-22-087-18W6	MUSKRAT
15375	B-097-A/094-A-14	BUICK CREEK
8888	A-081-D/094-A-14	BUICK CREEK
22917	D-036-A/094-A-13	FIREWEED
19137	A-058-H/094-A-13	FIREWEED
7011	D-026-K/094-H-02	BEATTON RIVER
7767	03-07-088-16W6	RIGEL
214	10-14-083-18W6	FORT ST JOHN
2543	08-29-084-18W6	EAGLE
212	06-16-083-18W6	FORT ST JOHN
213	13-02-083-17W6	FORT ST JOHN
2993	D-075-A/094-A-13	FIREWEED
19597	B-074-A/094-A-13	FIREWEED
4100	D-053-B/094-A-13	INGA
8268	C-035-A/094-A-13	FIREWEED
3333	B-004-H/094-A-13	FIREWEED
20589	A-082-G/094-A-13	FIREWEED
3809	B-068-B/094-A-13	INGA



General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
6254	10-05-083-18W6	FORT ST JOHN
4160	10-22-085-19W6	STODDART
1830	B-086-F/094-A-14	BUICK CREEK
3376	D-055-B/094-A-13	INGA
18369	D-088-B/094-A-14	BUICK CREEK
3447	D-035-L/094-A-09	RIGEL
4659	15-19-084-18W6	EAGLE
4102	C-054-A/094-A-13	FIREWEED
18132	C-005-H/094-H-03	PICKELL
18133	D-085-A/094-H-03	PICKELL
18135	C-074-A/094-H-03	PICKELL
19945	C-010-E/094-H-02	PICKELL
19947	D-022-H/094-H-03	PICKELL
19948	C-013-H/094-H-03	PICKELL
19957	C-003-H/094-H-03	PICKELL
7966	C-026-B/094-A-13	INGA
4093	A-067-B/094-A-13	INGA
4719	D-037-D/094-A-14	FIREWEED
3240	D-095-L/094-A-11	FIREWEED
4918	06-01-082-15W6	PARKLAND_BC
9450	D-021-B/094-A-13	INGA
10916	08-08-083-18W6	FORT ST JOHN
8415	A-036-A/094-A-13	FIREWEED
7154	11-20-082-22W6	MONIAS
7463	06-18-088-16W6	RIGEL
16445	08-32-082-20W6	MONIAS
4454	B-006-D/094-A-14	FIREWEED
4009	06-22-083-20W6	WILDER
10630	A-077-A/094-A-13	FIREWEED
75	03-29-083-18W6	FORT ST JOHN
10714	04-29-083-18W6	FORT ST JOHN
10587	01-36-081-15W6	PARKLAND_BC
9416	C-005-B/094-A-13	INGA
4405	D-039-D/094-A-14	FIREWEED
4893	A-067-D/094-A-14	FIREWEED
4865	D-015-D/094-A-14	FIREWEED
2411	06-16-084-20W6	BEAR FLAT
2502	11-29-084-18W6	EAGLE

General Order 2018-018 Schedule "B"

WA Number	UWI or NTS	Field
11462	C-063-G/094-A-13	FIREWEED
14247	14-18-088-19W6	BUICK CREEK
14212	B-017-H/094-A-13	FIREWEED
8023	D-002-H/094-H-03	FIREBIRD
9756	C-005-E/094-H-02	FIREBIRD
10915	16-07-083-18W6	FORT ST JOHN
18118	A-023-H/094-H-03	PICKELL
9684	10-35-083-18W6	FORT ST JOHN
6813	08-19-083-19W6	WILDER
2684	B-020-B/094-A-13	INGA
6431	11-21-086-20W6	STODDART
4103	06-35-083-17W6	AIRPORT
7074	12-29-084-18W6	EAGLE
7092	05-29-084-18W6	EAGLE
18238	A-070-C/094-H-02	FIREBIRD
6679	06-14-086-20W6	STODDART
6734	08-14-086-20W6	STODDART
11256	08-14-086-19W6	STODDART
17925	01-25-082-21W6	MONIAS
12153	C-014-B/094-A-14	BUICK CREEK
12900	B-030-A/094-A-14	BUICK CREEK
22044	B-042-B/094-A-13	INGA
13215	A-094-J/094-A-11	BUICK CREEK
19136	D-044-A/094-A-13	FIREWEED
15762	14-05-083-18W6	FORT ST JOHN
15221	A-022-F/094-A-13	INGA
4983	11-26-083-19W6	WILDER
12097	02-03-081-14W6	HERITAGE

General Order 2018-018 Schedule "C"

<b>Pipeline Project Number</b>	<b>Segment</b>
1012	11
1012	12
4849	6
2547	1
5624	1
8797	1
2169	3
2308	3
2504	1
3141	1
4321	1
3120	1
7046	2
5057	1
4849	4
4849	2
9630	1
7337	3
7337	1
9843	1
9921	1
11634	1
13696	1

General Order 2018-018 Schedule "D"

<b>Facility ID</b>	<b>UWI or NTS</b>	<b>Field</b>
455	00/16-22-087-18W6/00	MUSKRAT
803	00/B-002-J/094P14/00	HOSSITL
5249	00/15-19-086-18W6/00	STODDART
72	00/04-07-084-17W6/00	AIRPORT
1306	00/13-30-086-18W6/00	MONTNEY
420	00/08-14-086-20W6/00	STODDART
7366	00/15-27-083-19W6/00	WILDER