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Building Nunavut Together
Nunavutluqatigiingniq
Bâtir le Nunavut ensemble

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Department of Economic Development and Transportation
Pivalliyuliyikkut Ingilrayuliyitkullu
Ministère du Développement économique et des Transports

August 30, 2016

Cheryl McNeil
FORRI Project Manager
Natural Resources Canada
10 Fort William Place, 3rd Floor, Room. 301
St. John's, NL, Canada, A1C 1K4

RE: FORRI Framework Regulations Phase 2

Dear Ms. McNeil,

Thank you again for coordinating the consultation session held on June 28, 2016 regarding the *Frontier and Offshore Regulatory Renewal Initiative (FORRI)*. The Government of Nunavut (GN) wants to thank the Government of Canada, the Government of Newfoundland and Labrador, and the Government of Nova-Scotia for undertaking this initiative of amalgamating and modernizing five regulations under the Canada Oil and Gas Operations Act (COGOA). These five regulations include the drilling and production; geophysical; the certificate of fitness; operations; and installation regulations.

The GN appreciates the opportunity to comment on the policy intentions, and to take part in the consultation sessions at this early stage. We also want to thank you for sending the list of other Inuit organizations that are also consulted for this initiative. We were pleased to see that you have reached out to Nunavut Tunngavik Incorporated and the three (3) Regional Inuit Associations (the Qikiqtani, the Kitikmeot and Kivalliq) in Nunavut. The participation and consultation of Nunavut's Inuit Designated Organizations is of highest importance for the GN and ensure the successful implementation of the Nunavut Land Claims Agreement.



The GN supports the development of petroleum resources in a manner that is sustainable and protects public interest. This type of economic growth through the responsible development is one of our four priorities outlined in *Sivumut Abluqta*, the GN's mandate. The GN welcomes the FORRI initiative and its mandate to modernize the existing regulations, and move towards performance-based regulations. This approach will promote the use of best known practices and latest technological advances that supports protection of the environment, health and safety measures, and industrial efficiency. Currently, the GN jurisdiction has no control over our frontier and offshore petroleum resources; therefore, the FORRI is of special importance to us.

Specifically for “phase 2” of the proposed policy intentions of the framework regulations of the FORRI, the GN would like to comment on the following:

- **Part 10, Definition:** The definition for “*Good Oil Field Practices*” is broad and is too open ended of a definition. The GN recommends a precise and rigorous definition with interpretation to be included in this section. The expression appears several times throughout the document without being narrowly defined. For example, is the document referring to particular standards or certifications?
- **10.4 (2)(a): “*detailed testing program*”:** The GN recommends that a detailed list of expected programs be included. Or alternatively a reference to specific standards for testing programs is mentioned.



- **11.1(4) “zones”:** The term “zones” is used repetitively in the document and needs to be narrowly defined. Additionally, the terms “field” and “pool” are used extensively in the document. The GN recommends the addition of detailed definitions for all three terms: zone, pool, and field in Part 11. The current use of the terms is too broad and open for interpretation.
- **11.2(b) “good measurement practices”:** This definition requires a definition and interpretation.
- **13.1(2) “The operator shall verify the isolation of all oil and gas bearing zones and discrete pressure zones prior to suspending or abandoning the well”:** The GN would like to see further instructions related to abandonment of wells, such as a timeline for subsequent monitoring of the terminated well.
- **13.1(6) “prevent any adverse effect on the environment”:** The GN is unclear as to what are the standards that the Board will be using to judge that the “no adverse effect” condition was fulfilled after abandonment.
- **13.2: Removal of Drilling Installations:** Where stated “in accordance with these Regulations”, references to the Regulations involved should be included. Does the statement refer to 13.1, or other to additional regulations stated elsewhere?



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Thank you for considering the GN recommendations. We look forward to hear back from you, and to take part in the consultation session (Phase 3). Should you have any concerns, questions or comments regarding our comments, please feel free to contact me by phone at 867-975-7892 or by email at dkunuk@gov.nu.ca.

Best Regards,

David Kunuk
Director Minerals and Petroleum Resources
Department of Economic Development and Transportation
Government of Nunavut