



July 20, 2020

The Honorable Sonja Savage, M.L.A  
Minister of Energy, Deputy House Leader  
324 Legislature Building  
10800 – 97 Avenue  
Edmonton, AB T5K 2B6

Dear Minister

Further to our correspondence dated April 29, 2020, we are again reaching out as professionals in the oil and gas industry. The Alberta Chapter of the Canadian Land Reclamation Association (CLRA) is concerned that the focus of the Site Rehabilitation Program (SRP) on the abandonment of additional wellbores across the Province does nothing to get leased and inactive wellsite land rehabilitated and back to the original landowner, as per the expectations of the Federal Government or taxpayers. **In fact, in actuality this will lead to a growing inventory of inactive and abandoned well count throughout the province without reducing the environmental liability in place.**

From our understanding, the Industry Advisor Committee (IAC) is made up of larger well servicing companies who do not specialize in environmental work but rather focus on downhole oil and gas wellbore abandonment and decommissioning activities. The CLRA, on behalf of its membership, is genuinely concerned that the site rehabilitation and the environment is taking a backseat to wellbore abandonment activities.

When this program was announced by Prime Minister Trudeau on April 17, 2020, it was done so with specific promises to taxpayers focused on the cleanup of orphaned and abandoned wells. Prime Minister Trudeau publically noted that “cleaning them up will bring people back to work and help many landowners who have had these wells on their property for years, but haven’t been able to get them taken care of and the land restored”. In addition, he noted “We’ve gotten commitments by the government of Alberta to strengthen regulations so we see fewer orphan and inactive wells in the future”.

With this in mind, the CLRA and its members feel that a greater portion of the one billion dollars of SRP grant money should be directed to environmental assessment and cleanup of wellsites. With 95,000 inactive and 69,000 abandoned wells (as of March 2020) already existing in Alberta, there is no shortage of sites for which the surfaces have had no assessment or rehabilitation conducted.

We would like to remind Alberta Energy that many CLRA members in Alberta are specialized oilfield workers who work closely with local communities and landowners to rehabilitate abandoned and inactive wellsites which can then be turned back to the landowner for their use. Additionally, our members support locally owned businesses across the Province, both small and large, to complete the rehabilitation including: hotels, restaurants, gas stations, yellow iron equipment, light reclamation equipment, heavy haul trucking services, reclamation material suppliers, hydrovac companies, utility

locators, laboratory services, landfills, waste management facilities, etc. Providing support to companies focused in reclamation and rehabilitation activities will not only increase job requirements in this field, but in the needed support services tied to the full scope of work.

We strongly request Alberta Energy reassess the current SRP funding model. Phase/Period 1B monies, and subsequent tranches, should be focussed on environmental assessment and clean-up of the current inventory of inactive and abandoned wells, and potentially contaminated and disturbed wellsites that landowners, environmental groups and the public are most concerned about. Once priority has been given to the known concerns already at hand for the province, any additional funding remaining in the program would have the opportunity to be focused on additional abandonment and downhole activities for the future.

Sincerely,

A handwritten signature in black ink, appearing to read 'K Zadko', written in a cursive style.

Kelly Zadko, B.Sc., P.Ag

President, Alberta Chapter – Canadian Land Reclamation Association