



December 5, 2019

4300-4100-32640-02

Stephen Penner, P.L. (Eng)
Exploitation Engineering Technologist
Canadian Natural Resources Ltd.
Suite 2100, 855 2nd Street S.W.
Calgary, Alberta T2P 4J8

Dear Mr. Penner:

**RE: PRODUCED WATER DISPOSAL SPECIAL PROJECT AMENDMENT #2
PRESSURE TESTING EXEMPTION
CNRL ET AL GRAHAM d-6-C/94-B-9; WA #8093
GRAHAM FIELD – BALDONNEL “A” POOL**

On December 4, 2019, Canadian Natural Resources Ltd. (CNRL) submitted a reservoir pressure test for the subject well calculated from a surface pressure measurement. The Commission does not consider surface pressure measurements to be of sufficient quality to satisfy the annual reservoir pressure testing required by produced water disposal special project approvals; outlined as condition 2e) of Order 15-02-001 Amendment #2. CNRL has confirmed that the well remains shut-in at this time.

The Commission considers the reported calculated bottom hole pressure of 15,406 kPa to be an estimate of the current reservoir pressure. The maximum approved formation pressure for this well is 19,700 kPa. The Commission will consider condition 2e) of Order 15-02-001, Amendment #2 satisfied for the 2019 calendar year with the understanding that a reservoir pressure test, using downhole recorders, will be conducted prior to recommencing disposal operations in the well or, should no further disposal occur, prior to the abandonment of the well.

The annual reservoir pressure testing requirement outlined in condition 2e) of Order 15-02-001, Amendment #2, is hereby waived until the well is active. **A reservoir pressure test using downhole recorders must be conducted prior to recommencing disposal in the Baldonnel formation.**

Should you have any questions, please contact the undersigned at (250) 419-4430 Kathryn Archibald at (250) 419-4406.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Stefik'.

Ron Stefik, Eng.L.
Supervisor, Reservoir Engineering
BC Oil and Gas Commission

cc: Lynn Wood, Exploitation Engineer – BC North, Canadian Natural Resources Ltd.