

Questions/Comments from the Ontario Petroleum Institute (OPI) on the Proposed Amendments to the *Oil, Gas and Salt Resources Act (the "Act")*.

1. Point 1 from NDMNRF Proposal - Narrow the prohibitions on the injection of carbon dioxide so that going forward, the prohibition would only apply to the injection of carbon dioxide for the purpose of carbon sequestration, when used in association with a project to enhance the recovery of oil or gas

OPI Comments/Questions:

OPI does not agree that there should be a prohibition on the injection of carbon dioxide when used in association with a project to enhance recovery of oil or gas. OPI respectfully feel that this would be an added benefit of carbon sequestration in producing reservoirs, which would help enhance the economics of carbon sequestration projects and perhaps lead to more widespread adoption of these projects. It would provide additional incentives to oil and gas producers enabling them to more effectively extract the oil and gas natural resources of Ontario, while having the added benefit of removing carbon dioxide from the environment and storing it within the producing reservoirs.

OPI would be interested to learn the NDMNRF's reasoning behind including this prohibition in the proposed changes to the Act.

2. Point 2 from NDMNRF Proposal - Add the ability for us to enter into agreements with companies that want to use wells to explore, test, pilot or demonstrate new technologies (such as carbon storage) in relation to wells used for oil, gas, solution-mined salt as well as underground storage resources. This would provide the ability to bring new types of projects that are associated with the same subsurface spaces where oil, gas, salt or underground storage occur, under the scope of the Oil, Gas and Salt Resources Act

OPI is supportive of this proposed change to the Act.

3. Point 3 from NDMNRF Proposal - enhance provisions for corporate accountability and enhance existing protections to allow for the issuance of orders to prevent risks to the public or environment

Please elaborate on the proposed revisions for corporate accountability and what specific changes are being contemplated.

OPI does not understand how this proposal related to carbon storage in geologic reservoirs but requires additional information on the proposed changes to be able to provide a more fulsome comment. However, at the outset, OPI does not feel that additional provisions on corporate accountability are required to be made to the Act as these provisions already exist and appear to be sufficient and effective.

What is meant by "enhance existing protections to allow for the issuance of orders"?

Does this just apply to corporate accountability with respect to geologic carbon storage or is this contemplated as being a change to the Act as a whole, including with respect to existing oil and gas operations?

Please direct your response to Scott Lewis, Chair of OPI at 519-871-0876 or [slewis@lagasco.ca](mailto:slewis@lagasco.ca).