



Mr. Andrew Ogilvie  
Manager of Resources Development  
Resources Planning and Development Policy Branch - Policy Division  
Ministry of Natural Resources and Forestry  
300 Water Street  
Peterborough, ON K9J 3C7

September 27, 2023

BY EMAIL: [andrew.ogilvie@ontario.ca](mailto:andrew.ogilvie@ontario.ca)

Dear Mr. Ogilvie,

I am writing on behalf of the Ontario Petroleum Institute ("OPI") and in response to the Proposed Regulation with ERO 019-7507, which consultation presently closes for comments on October 16, 2023.

The changes proposed under Part 2, which will affect all well transfers, new well licenses, conversions, or consents to adjust security *after the date of this posting* (being September 1, 2023) create grave concerns to the OPI membership and the industry.

Specifically, the OPI opposes aspects of the proposed Part 2 changes in this proposed regulation as they **directly contravene** the stated goal of the MNRF "to reduce the number of future orphaned oil and gas wells". The OPI would strongly suggest that the deadline for consultation on Part 2 be extended to December to allow for the effects of the changes to be more thoroughly explored by the MNRF *and* the OPI, working together in a meaningful way, which dialogue has not commenced on these critical industry matters.

As such, the OPI Board is requesting an urgent meeting to discuss the proposed changes and offer the OPI's insights and suggestions as soon as possible. Please provide some available dates for this meeting. In the interim, all changes to Part 2 should be held pending the appropriate and adequate consultation on these suggested changes with the industry stakeholders. The OPI Board believes that through appropriate and adequate consultation the negative impact of some of the proposed changes to industry stakeholders will be made clear.

Yours very truly,

Scott Lewis, Chairman  
Ontario Petroleum Institute