

May 13, 2020

By e-mail only

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**Shell Canada Limited Transfer of Ownership Including the Waterton Sour Gas Plant EPEA Application No 021-258 and Jumping Pound Sour Gas Plant EPEA Application No. 015-11587**

Dear Ms. Lemay and Ms. McLeod,

On December 4, 2019 and December 10, 2019, Shell Canada Limited (Shell) jointly with Pieridae Alberta Production Ltd. (Pieridae) submitted applications pursuant to the *Environmental Protection and Enhancement Act* (EPEA) in relation to its sour gas processing plants located at the Waterton Gas Plant (02-20-04-3-W4M) (Waterton) and the Jumping Pound Gas Plant (13-13-25-05W5M) (Jumping Pound) (respectively the sites). The EPEA Applications were submitted under section 70 of the EPEA, and request (a) an amendment to the existing EPEA approvals 258-03-00 and 11587-02-00 (b) a transfer of the amended approvals to Pieridae, and (c) the issuance of a new EPEA approval to Shell for the operation and maintenance of the Containment and Monitoring System (CMS) currently present and operating at the two sites. Shell has indicated that the purpose for the above applications is to allow it to retain liability and responsibility for certain operational and remedial aspects of the sites in relation to historical Sulfinol™ contamination, and to allow Pieridae to retain other operational rights as well as regulatory responsibility for all other closure, remediation, and reclamation activities.

Shell and Pieridae also submitted related applications under the *Public Lands Act*, *Water Act*, *Pipeline Act*, and pursuant to the *Oil and Gas Conservation Act* (OGCA) and *Oil and Gas Conservation Rules* (OGCR) to transfer to Pieridae, the associated *Water Act* licences and approvals, public land dispositions, landfills, schemes, large facility licences, EPEA approvals, and wells, facility and pipeline licenses in the

Waterton, Jumping Pound and Caroline areas. The parties requested that all of the above applications be considered and decided together. The applications are identified in Appendix A<sup>1</sup>.

For the reasons that follow, the AER has decided to refuse the above applications.

The EPEA applications for the Waterton and Jumping Pound gas plants propose to split existing approvals at the sites in order to facilitate the separation of regulatory liability for historic Sulfinol™ and certain other substances (which would be Shell's responsibility) from all other remediation and reclamation liability (which would be Pieridae's responsibility).

The initial flaw with this approach is that the scope and extent of the contamination at the site is not well known and is not well described in the applications. To date, the contamination at the sites has not been fully understood. Based on the AER's review of the most recent Site Specific Liability Assessments (SSLAs) for the sites, there are significant gaps in the information that Shell possesses about the contamination and associated liabilities at the sites. Without up to date and accurate information about the state of sites, it is not clear how 'Sulfinol™ contamination<sup>2</sup> associated with the historical operation' of the sites, for which Shell wishes to keep the liability, will be distinguished from other contamination from ongoing operation that would, if the transfer is approved, be assumed by Pieridae (including presumably from 'non-historical' Sulfinol™). Operationally, it is unclear how Shell will be able to identify, and subsequently remediate only historic Sulfinol™, and how all other substances on the same site, including subsequent Sulfinol™ contamination, will be identified and remediated by Pieridae.

Hence, the parties are requesting that the AER move away from a situation of regulatory certainty regarding operational and closure obligations for the sites (where Shell is the person responsible for all pollution and ultimately for reclamation of the sites), and approve a far less certain situation, where the

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<sup>1</sup> Shell also submitted similar and corresponding applications for the issuance of new and amended licences under the *Oil and Gas Conservation Act* (OGCA) and Directive 056. The AER refused those applications on February 28, 2020. In addition, Shell submitted corresponding applications to extend the expiry date and stack top temperature on its Jumping Pound sour gas plant EPEA approval, which was set to expire on May 31, 2020. As these EPEA applications did not hinge on the approval of the transfer or split liability applications and met all other applicable requirements, the AER approved these applications on February 28, 2020. These applications are not the subject of this decision and are therefore not identified in Appendix A.

<sup>2</sup> In its applications, Shell defines the contamination for which it would be responsible as 'environmental liability associated with sulfinol, by itself or in combination with hydrocarbons and chloride in soils or groundwater in and around the Facility resulting from historic operation of the Facility.'

parties will have separate and partial regulatory obligations regarding different aspects of operations, remediation, monitoring and reclamation of the sites. The scope of each parties' obligations and how they would be fulfilled if there were separate approvals is uncertain given the present lack of information about the scope and nature of contamination and substances at the site.

Moreover, the proposed EPEA approvals are contrary to fundamental principles and provisions in EPEA. Shell is the polluter and person responsible for Sulfinol™ as well as other substances at the sites<sup>3</sup>. It is also an operator under the reclamation provisions of EPEA, and is therefore required to conserve and reclaim the sites<sup>4</sup>. The EPEA applications appear to request that the AER, by way of approval, override or at least significantly dilute Shell's obligations under EPEA in order to mirror or give effect to a business arrangement between two parties. For example, Shell has indicated that through its proposed EPEA approval, it will retain only liability for the ongoing remediation and reclamation of historic Sulfinol™ contamination (as defined in its application), but that decommissioning, remediation and reclamation of the sour gas processing plant will be Pieridae's obligation. However, since its proposed approval would overlap the entirety of both sites (not just the area where Shell operates the CMS), Shell would remain obligated to reclaim the lands under the relevant provisions of EPEA, which does not discriminate or allocate reclamation duties by substance. Therefore, the approval requested on its face appears contrary to the reclamation requirements in the EPEA.

The type of split liability proposed in the EPEA applications is also contrary to the concept of joint and several liability that is an underlying principle in the enforcement of obligations amongst operators and persons responsible under different provisions of EPEA. Issuing such approvals would likely create regulatory uncertainty as to the enforcement of EPEA obligations. For example, when the AER issues enforcement and environmental protection orders that name more than one person, all persons named in the order are jointly responsible for carrying out the terms of the order and are jointly and severally liable for payment of the costs of doing so<sup>5</sup>. From an enforcement perspective, it would be undesirable to have a situation where there could be two potentially competing instruments – approvals and subsequent orders

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<sup>3</sup> Section 2(i) of the EPEA expressly recognizes the principle that polluters are to pay for the costs of their actions; Shell is also the person responsible under the EPEA for sulfinol and any other substance that is in, on or under the sites (section 2(tt) and section 107(c)).

<sup>4</sup> Section 137(1) of the EPEA; Shell is an operator pursuant to section 134(b) of EPEA.

<sup>5</sup> Section 210 & 215 of the EPEA.

under EPEA – which have inconsistent obligations regarding who is responsible for remediation of substances and reclamation of the lands.

A similar consideration is that an approval containing only obligations without corresponding benefits (i.e. the right to produce and process gas) would disincentivize compliance with approval terms and other existing duties. Based on what is proposed in the applications, Shell would only have obligations with the issuance of the new EPEA approvals with respect to existing Sulfinol™ contamination, without any tangible corresponding benefits. This could effectively reduce the number of meaningful enforcement tools available to the AER. For example, if the AER were to issue an enforcement order under section 215 of EPEA requiring the cancellation or suspension of Shell's approval, or directing Shell to cease activities under its approval (i.e. remediation and/or monitoring), there would be little or no consequence for Shell, since it is not benefitting from corresponding processing and production activities and deriving no obvious benefit in carrying out the activities under its approvals. Also, in the event of a cancellation of its approval, it would be difficult for the AER to require Shell to remediate historic Sulfinol™ contamination on the rest of the site given Pieridae's overlapping approved and ongoing production and processing operations.

The AER is of the view that it cannot, by way of approval, carve up and re-distribute fundamental regulatory obligations in a manner that is contrary to or inconsistent with EPEA. It would also be irresponsible for the AER to create a situation where the parties might rely on the terms and scope of their approvals to try to avoid responsibilities under the EPEA and any future orders issued thereunder.

The proposed approval would also be contrary to the AER's mandate under section 2(1)(a) of the *Responsible Energy Development Act* (REDA). That section of the REDA provides that the mandate of the AER is

- (a) to provide for the efficient, safe, orderly and environmentally responsible development of energy resources in Alberta through the Regulator's regulatory activities,

It is not efficient or orderly for the AER to administer two approvals setting out separate partial regulatory obligations when one single approval already exists and covers all operational and reclamation aspects for each site. Nor is it orderly or efficient to split EPEA rights and obligations amongst separate operators for the same site and activity. As described above, subdividing one aspect of an approved EPEA activity, namely reclamation, for the same site between two operators creates administrative uncertainty and may also diminish the AER's ability to enforce reclamation responsibilities under EPEA. This could impact the AER's ability to provide for environmentally responsible development mandated by section 2(1)(a) of the REDA.

Further, Shell is currently the sole licensee under its OGCA licences at the sites, and the AER previously decided that it could not issue separate OGCA licences for the CMS related facilities and the other facilities on the site. It would be inconsistent with section 2(a) of REDA to have separate or ‘split’ approvals for the same activity under the specified enactments (i.e. the EPEA), but single approvals for the same facilities, operations and sites under the energy resource enactments (i.e. the OGCA).

Given the contradictions with the REDA and the EPEA, and the regulatory, operational, compliance and enforcement difficulties that would result, the AER has decided to refuse the EPEA applications. Trying to manage and enforce different reclamation obligations amongst different approval holders would be inefficient, disorderly and extremely burdensome. This would unnecessarily complicate the administration of licences and approvals down the road and could create challenges in the enforcement of obligations under EPEA and the various approvals.

The AER notes that the legislative scheme established by the OGCA contemplates that the licensee and the operator can be different persons<sup>6</sup>. Based on the information provided by Shell on the commercial arrangement between the parties, Pieridae is the operator at the sites. This current arrangement between Shell and Pieridae accords with the AER’s regulatory framework.

Given that the applications were submitted as a bundle with the EPEA and other OGCA applications which have now been refused, and were contingent on the ability to distinguish historical Sulfinol™ contamination liability from future liability as contemplated in these other applications, the AER refuses to consent to the transfers and assignments listed in Appendix 1. This refusal is without prejudice to Shell and Pieridae’s right to submit further applications independently of the refused EPEA and OGCA applications requesting the split of liability and associated obligations between the parties.

Under the REDA an eligible person may file a request for a regulatory appeal on an appealable decision. Eligible persons and appealable decisions are defined in section 36 of the REDA and section 3.1 of the *Responsible Energy Development Act General Regulation*. If you wish to file a request for regulatory appeal, you must submit your request in the form and manner and within the timeframe required by the

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<sup>6</sup> A licensee means the holder of a licence according to the records of the AER (section 1(1)(cc) of the OGCA). Section 1(1) (kk) of the OGCA also defines the term operator, and includes a person who is not the licensee.

AER. You can find filing requirements and forms on the AER website [www.aer.ca](http://www.aer.ca) under Applications & Notices: Appeals.

Sincerely,

*Lane Peterson*

Lane Peterson  
Director, Oil & Gas Surface Regulatory Applications  
Alberta Energy Regulator

cc: Jodie Didow, Shell Canada Ltd.  
Deanna Cattrel, Shell Canada Ltd.  
Bola Talabi, Interim Vice President, Regulatory Applications  
Steve Thomas, Director Regulatory Applications  
Trevor Gosselin, Director Regulatory Applications  
Sean Sexton, Law Branch

Enclosure: Appendix A

## Appendix A - Table of Applications

Application no.	Location (Section, Township, Range, West of the <i>n</i> th Meridian)
1925373	033-04W5M; 034-04W5M; 034-05W5M; 035-05W5M; 035-06W5M; 036-06W5M
1925399	16-034-03W5M; 01-033-05W5M; 02-035-05W5M; 21-033-06W5M; 01-036-06W5M; 17-034-03W5M; 15-033-05W5M; 05-035-05W5M; 31-033-06W5M; 35-033-07W5M; 34-031-04W5M; 01-034-05W5M; 10-035-05W5M; 03-034-06W5M; 35-031-04W5M; 19-034-05W5M; 15-035-05W5M; 05-034-06W5M; 20-033-04W5M; 22-034-05W5M; 16-035-05W5M; 34-034-06W5M; 32-033-04W5M; 24-034-05W5M; 19-035-05W5M; 35-034-06W5M; 06-034-04W5M; 29-034-05W5M; 28-035-05W5M; 02-035-06W5M; 18-034-04W5M; 33-034-05W5M; 30-035-05W5M; 13-035-06W5M; 30-034-04W5M; 35-034-05W5M; 32-035-05W5M; 34-035-06W5M
1925400	29-034-06W5M; 24-032-10W5M; 22-033-10W5M; 13-034-11W5M; 28-035-12W5M; 35-034-06W5M; 25-032-10W5M; 28-033-10W5M; 27-034-11W5M; 32-035-12W5M; 28-034-07W5M; 35-032-10W5M; 29-033-10W5M; 34-034-11W5M; 06-036-12W5M; 15-034-08W5M; 36-032-10W5M; 32-033-10W5M; 03-035-11W5M; 17-036-12W5M; 12-031-09W5M; 01-033-10W5M; 05-034-10W5M; 05-035-11W5M; 10-037-12W5M; 07-032-09W5M; 02-033-10W5M; 06-034-10W5M; 07-035-11W5M; 36-035-13W5M; 18-032-09W5M; 11-033-10W5M; 07-034-10W5M; 09-035-11W5M; 12-036-13W5M; 19-032-09W5M; 12-033-10W5M; 32-036-10W5M; 11-035-11W5M; 15-036-13W5M; 30-032-09W5M; 14-033-10W5M; 34-036-10W5M; 12-035-11W5M; 25-036-13W5M; 06-033-09W5M; 15-033-10W5M; 02-037-10W5M; 17-035-11W5M; 01-038-13W5M; 25-034-09W5M; 16-033-10W5M; 05-037-10W5M; 18-035-11W5M; 10-037-14W5M; 10-035-09W5M; 20-033-10W5M; 07-037-10W5M; 35-035-11W5M; 16-037-14W5M; 32-035-09W5M; 21-033-10W5M; 12-034-11W5M; 02-036-11W5M; 11-038-15W5M
1925403	07-006-02W5M
1925404	35-034-06W5M

<b>Application no.</b>	<b>Location (Section, Township, Range, West of the <i>n</i>th Meridian)</b>
1925405	31-022-03W5M; 30-024-05W5M; 25-022-06W5M; 33-024-06W5M; 22-025-06W5M; 06-023-03W5M; 13-025-05W5M; 27-022-06W5M; 34-024-06W5M; 23-025-06W5M; 04-021-04W5M; 14-025-05W5M; 28-022-06W5M; 35-024-06W5M; 25-025-06W5M; 05-021-04W5M; 23-025-05W5M; 29-022-06W5M; 36-024-06W5M; 27-025-06W5M; 34-023-04W5M; 24-025-05W5M; 32-022-06W5M; 01-025-06W5M; 28-025-06W5M; 03-024-04W5M; 26-025-05W5M; 33-022-06W5M; 02-025-06W5M; 29-025-06W5M; 04-024-04W5M; 34-025-05W5M; 02-023-06W5M; 03-025-06W5M; 32-025-06W5M; 29-024-04W5M; 35-025-05W5M; 03-023-06W5M; 04-025-06W5M; 33-025-06W5M; 31-024-04W5M; 03-026-05W5M; 05-023-06W5M; 09-025-06W5M; 05-026-06W5M; 06-025-04W5M; 09-026-05W5M; 06-023-06W5M; 10-025-06W5M; 07-026-06W5M; 07-025-04W5M; 10-026-05W5M; 31-023-06W5M; 11-025-06W5M; 18-026-06W5M; 15-025-04W5M; 15-026-05W5M; 09-024-06W5M; 13-025-06W5M; 19-026-06W5M; 25-021-05W5M; 16-026-05W5M; 11-024-06W5M; 14-025-06W5M; 30-026-06W5M; 35-021-05W5M; 21-026-05W5M; 13-024-06W5M; 15-025-06W5M; 24-026-07W5M; 02-022-05W5M; 28-026-05W5M; 24-024-06W5M; 16-025-06W5M; 04-022-05W5M; 15-022-06W5M; 25-024-06W5M; 20-025-06W5M; 19-024-05W5M; 22-022-06W5M; 27-024-06W5M; 21-025-06W5M
1925406	01-005-02W4M; 01-004-01W5M; 24-004-01W5M; 09-005-02W5M; 05-007-02W5M; 15-004-29W4M; 02-004-01W5M; 28-004-01W5M; 10-005-02W5M; 07-007-02W5M; 08-003-30W4M; 04-004-01W5M; 30-004-01W5M; 11-005-02W5M; 08-007-02W5M; 09-003-30W4M; 05-004-01W5M; 31-004-01W5M; 15-005-02W5M; 19-007-02W5M; 22-003-30W4M; 08-004-01W5M; 32-004-01W5M; 17-005-02W5M; 24-007-02W5M; 28-003-30W4M; 09-004-01W5M; 33-004-01W5M; 28-005-02W5M; 01-006-03W5M; 33-003-30W4M; 10-004-01W5M; 06-005-01W5M; 29-005-02W5M; 03-006-03W5M; 04-004-30W4M; 11-004-01W5M; 04-006-01W5M; 33-005-02W5M; 08-006-03W5M; 08-004-30W4M; 12-004-01W5M; 05-006-01W5M; 04-006-02W5M; 09-006-03W5M; 20-004-30W4M; 13-004-01W5M; 24-004-02W5M; 05-006-02W5M; 10-006-03W5M; 21-004-30W4M; 15-004-01W5M; 25-004-02W5M; 07-006-02W5M; 12-006-03W5M; 12-003-01W5M; 16-004-01W5M; 26-004-02W5M; 16-006-02W5M; 17-006-03W5M; 23-003-01W5M; 17-004-01W5M; 34-004-02W5M; 17-006-02W5M; 20-006-03W5M; 25-003-01W5M; 18-004-01W5M; 35-004-02W5M; 20-006-02W5M; 24-007-03W5M; 34-003-01W5M; 20-004-01W5M; 01-005-02W5M; 21-006-02W5M; 16-007-04W5M; 35-003-01W5M; 21-004-01W5M; 02-005-02W5M; 29-006-02W5M; 32-013-04W5M; 36-003-01W5M; 22-004-01W5M; 03-005-02W5M; 32-006-02W5M
1925943	02-20-004-30W4M; 01-24-004-01W5M
1925945	06-21-004-30W4M
1925946	SW-21-004-30W4M
1925948	SW-21-004-30W4M



<b>Application no.</b>	<b>Location (Section, Township, Range, West of the <i>n</i>th Meridian)</b>
1925960	20-004-30W4M
1926071	13-025-05W5M
1926086	06-13-025-06W5M
1926110	13-13-025-05W5M; 05-24-025-05W5M
A10100925	18-034-04W5M; 13-035-06W5M; 35-033-07W5M; 10-035-05W5M; 33-034-05W5M; 16-035-05W5M; 28-034-07W5M; 19-034-07W5M; 33-034-06W5M; 25-034-07W5M; 29-034-06W5M; 26-034-07W5M; 31-033-06W5M; 25-034-05W5M; 33-033-06W5M; 11-035-06W5M; 02-035-06W5M; 01-035-06W5M; 04-034-06W5M; 05-034-06W5M; 28-033-06W5M; 32-033-06W5M; 06-034-06W5M; 36-033-07W5M; 34-034-05W5M; 07-034-04W5M; 12-034-05W5M; 13-034-05W5M; 29-033-04W5M; 11-033-05W5M; 14-033-05W5M; 15-033-05W5M; 23-034-06W5M; 27-034-06W5M; 34-034-06W5M; 35-034-06W5M; 24-034-06W5M; 36-034-06W5M; 28-032-04W5M; 12-035-06W5M
A10100926	34-034-06W5M; 35-034-06W5M
A10100927	15-033-10W5M; 22-033-10W5M; 07-034-10W5M; 12-034-11W5M; 13-034-11W5M; 10-037-12W5M; 15-037-12W5M; 05-037-10W5M; 32-036-10W5M; 33-036-10W5M; 32-033-08W5M; 02-037-10W5M; 03-037-10W5M; 01-036-11W5M; 02-036-11W5M; 06-036-10W5M; 35-035-11W5M; 06-034-10W5M; 08-036-12W5M; 01-033-10W5M; 02-033-10W5M; 35-032-10W5M; 36-032-10W5M; 11-033-10W5M; 12-033-10W5M; 03-035-11W5M; 10-035-11W5M; 11-035-11W5M; 16-034-08W5M; 17-034-08W5M; 18-034-08W5M; 19-034-08W5M; 25-034-09W5M; 30-034-08W5M; 15-035-09W5M; 17-032-09W5M; 02-035-09W5M; 11-035-09W5M; 34-034-09W5M; 04-032-09W5M; 05-032-09W5M; 08-032-09W5M; 33-031-09W5M; 34-031-09W5M; 03-034-09W5M; 04-034-09W5M; 10-034-09W5M; 11-034-09W5M; 01-034-11W5M; 22-034-11W5M; 27-034-11W5M; 34-034-11W5M; 19-036-13W5M; 20-036-13W5M; 23-036-14W5M; 24-036-14W5M; 29-036-13W5M; 01-036-13W5M; 02-036-13W5M; 36-035-13W5M; 19-032-09W5M; 24-032-10W5M; 25-032-10W5M; 05-034-10W5M; 08-034-10W5M; 29-033-10W5M; 32-033-10W5M; 10-033-10W5M; 16-033-10W5M; 20-033-10W5M; 21-033-10W5M; 17-035-11W5M; 28-033-10W5M; 16-037-14W5M; 20-037-14W5M; 21-037-14W5M; 29-037-14W5M; 30-032-09W5M; 12-036-13W5M; 18-034-10W5M; 01-038-15W5M; 02-038-15W5M; 11-038-15W5M; 10-037-14W5M; 15-037-14W5M; 31-033-10W5M; 09-035-11W5M; 15-035-11W5M; 16-035-11W5M; 28-032-09W5M; 04-037-10W5M; 28-034-11W5M;

Application no.	Location (Section, Township, Range, West of the <i>n</i> th Meridian)
	29-034-11W5M; 33-034-11W5M; 25-036-14W5M; 36-036-14W5M; 34-036-10W5M; 35-036-10W5M; 05-036-12W5M; 05-033-09W5M; 06-033-09W5M; 31-032-09W5M; 32-032-09W5M; 06-037-10W5M; 07-037-10W5M; 11-036-11W5M; 30-033-10W5M; 36-033-11W5M; 18-032-09W5M; 20-032-09W5M; 14-033-10W5M; 12-031-09W5M; 02-034-11W5M; 10-034-11W5M; 11-034-11W5M; 15-034-11W5M; 07-032-09W5M; 26-032-10W5M; 32-035-12W5M; 01-038-13W5M; 06-038-12W5M; 07-038-12W5M; 08-038-12W5M; 12-038-13W5M; 17-038-12W5M; 20-038-12W5M; 21-038-12W5M; 15-036-13W5M; 06-036-12W5M; 13-034-08W5M; 24-034-08W5M; 15-034-08W5M; 01-036-10W5M; 11-036-10W5M; 17-036-12W5M; 21-035-10W5M; 09-034-08W5M; 10-034-08W5M; 14-034-08W5M; 19-034-07W5M; 20-034-07W5M; 23-034-07W5M; 24-034-07W5M; 25-034-07W5M; 26-034-07W5M; 27-034-07W5M; 28-034-06W5M; 28-034-07W5M; 29-034-06W5M; 29-034-07W5M; 30-034-06W5M; 33-034-06W5M; 34-034-06W5M; 35-034-06W5M; 05-034-09W5M; 07-033-09W5M; 14-034-09W5M; 17-033-09W5M; 18-033-09W5M; 20-033-09W5M; 23-034-09W5M; 24-034-09W5M; 29-033-09W5M; 31-033-09W5M; 32-033-09W5M; 35-034-09W5M; 36-034-09W5M; 06-036-09W5M; 10-035-09W5M; 12-036-10W5M; 14-036-10W5M; 16-035-09W5M; 20-035-09W5M; 21-035-09W5M; 23-036-10W5M; 26-036-10W5M; 29-035-09W5M; 31-035-09W5M; 32-035-09W5M; 03-033-10W5M; 26-034-11W5M; 35-034-11W5M; 02-036-10W5M; 12-035-11W5M; 13-035-11W5M; 18-035-10W5M; 19-035-10W5M; 20-035-10W5M; 27-035-10W5M; 28-035-10W5M; 34-035-10W5M; 35-035-10W5M; 05-035-11W5M; 06-035-11W5M; 07-035-11W5M; 18-035-11W5M; 13-035-12W5M; 14-035-12W5M; 22-035-12W5M; 23-035-12W5M; 27-035-12W5M; 28-035-12W5M; 29-035-12W5M; 18-036-12W5M; 19-036-12W5M; 24-036-13W5M; 25-036-13W5M; 26-036-13W5M; 27-036-13W5M; 28-036-13W5M; 34-036-13W5M; 02-037-14W5M; 11-037-14W5M; 35-036-14W5M

<b>Application no.</b>	<b>Location (Section, Township, Range, West of the <i>n</i>th Meridian)</b>
A10100929	20-006-03W5M; 29-006-03W5M; 11-004-01W5M; 12-004-01W5M; 01-004-01W5M; 12-004-01W5M; 32-003-30W4M; 36-003-01W5M; 10-006-03W5M; 11-006-03W5M; 12-006-03W5M; 20-006-02W5M; 17-006-02W5M; 21-004-01W5M; 28-004-01W5M; 16-006-03W5M; 17-006-03W5M; 20-006-03W5M; 20-004-01W5M; 02-005-02W5M; 31-004-01W5M; 05-014-04W5M; 32-013-04W5M; 03-006-03W5M; 09-006-03W5M; 15-006-03W5M; 28-003-30W4M; 02-004-01W5M; 34-003-01W5M; 35-003-01W5M; 23-003-01W5M; 24-003-01W5M; 25-003-01W5M; 09-004-01W5M; 10-004-01W5M; 15-004-01W5M; 08-003-30W4M; 09-003-30W4M; 12-003-01W5M; 16-007-04W5M; 29-006-03W5M; 30-006-03W5M; 01-006-03W5M; 11-004-01W5M; 16-004-01W5M; 03-005-02W5M; 11-005-02W5M; 29-004-01W5M; 30-004-01W5M; 17-004-01W5M; 19-004-01W5M; 24-004-02W5M; 25-004-02W5M; 26-004-02W5M; 08-006-03W5M; 01-005-02W5M; 36-004-02W5M; 11-005-01W5M; 23-004-01W5M; 35-004-02W5M; 32-004-01W5M; 04-004-01W5M; 22-004-01W5M; 26-003-01W5M; 14-006-03W5M; 33-004-01W5M; 08-005-02W5M; 25-004-01W5M; 13-004-01W5M; 15-005-02W5M; 29-005-02W5M; 05-004-01W5M; 15-003-30W4M; 14-004-01W5M; 16-003-30W4M; 18-004-01W5M; 34-004-02W5M; 24-004-01W5M; 27-004-01W5M; 17-005-02W5M; 16-006-02W5M; 29-006-02W5M; 02-005-01W5M; 13-006-02W5M; 18-006-01W5M; 27-005-01W5M; 17-007-02W5M
A10100930	12-023-06W5M; 13-023-06W5M; 14-023-06W5M; 15-023-06W5M; 16-023-06W5M; 17-023-06W5M; 05-023-06W5M; 13-024-06W5M; 24-024-06W5M; 24-022-06W5M; 27-022-06W5M; 34-024-06W5M; 05-021-04W5M; 33-024-06W5M; 02-023-06W5M; 03-023-06W5M; 07-023-05W5M; 11-023-06W5M; 11-025-06W5M; 35-021-05W5M; 02-022-05W5M; 04-023-06W5M; 29-022-06W5M; 32-022-06W5M; 14-025-06W5M; 25-022-06W5M; 27-024-06W5M; 28-022-06W5M; 33-022-06W5M; 06-023-06W5M; 34-021-05W5M; 35-024-06W5M; 04-025-06W5M; 16-025-06W5M; 10-022-06W5M; 31-023-06W5M; 22-022-06W5M; 16-026-05W5M; 03-024-04W5M; 04-024-04W5M; 05-026-06W5M; 10-023-06W5M; 20-023-06W5M; 21-023-06W5M; 29-023-06W5M; 32-023-06W5M; 05-024-06W5M; 08-024-06W5M; 09-024-06W5M; 10-024-06W5M; 11-024-06W5M; 14-024-06W5M; 36-024-06W5M; 25-024-06W5M; 15-022-06W5M; 03-022-05W5M; 04-021-04W5M; 04-022-05W5M; 07-021-04W5M; 18-021-04W5M; 19-021-04W5M; 24-021-05W5M; 25-021-05W5M; 26-021-05W5M; 01-022-06W5M; 02-022-06W5M; 05-022-05W5M; 06-022-05W5M; 11-022-06W5M
A10101091	11-004-01W5M; 12-004-01W5M; 17-004-01W5M; 20-004-01W5M; 02-005-02W5M
A10101092	04-022-05W5M
A10101093	23-034-06W5M; 02-035-06W5M; 12-035-06W5M
A10101094	19-032-09W5M; 28-032-09W5M; 15-034-11W5M
00000258-021	004-30W4M to 004-01W5M

<b>Application no.</b>	<b>Location (Section, Township, Range, West of the <i>n</i>th Meridian)</b>
00001711-004	05-12-033-10W5M
00011323-015	12-035-034-06W5M
00011668-004	13-22-022-06W5M
00020514-002	16-23-03-01W5M
00020515-003	NW-09-03-30W4M; SW-09-03-30W4M
00027142-003	SE-15-033-05W5M
00030404-002	11-09-03-30W4M
00386786-002	SW-12-033-10W5M
00403327-003	16-17-035-11W5M
00403668-002	NW-18-034-04W5M
00413351-002	04-35-021-05W5M
00413352-002	13-22-022-06W5M
00413432-002	03-13-025-06W5M
00458763-001	SE-24-004-01W5M; 20-004-30W5M; 21-004-30W5M; NE-13-004-01W5M; NE-17-004-30W4M; NW-16-004-30W4M
00458837-001	NW-13-025-05W5M; SW-24-025-05W5M; SE-23-025-05W5M
00011587-015	NW-13-025-05W5M; SW-24-025-05W5M; SE-23-025-05W5M
00039499-003	NE-17-004-30W4M; SW-15-004-30W4M
00040795-002	SW-24-025-05W5M
00383322-002	SW-15-004-30W4M