

Made at Bonnyville, in the
Province of Alberta, on November 14, 2024.

ALBERTA ENERGY REGULATOR

Under sections 22, 26.2, and 27 of the *Oil and Gas Conservation Act (OGCA)*, section 1.100 of the *Oil and Gas Conservation Rules (OGCR)*, and sections 22.1 and 23 of the *Pipeline Act*

Sunshine Oilsands Ltd.

1910, 715 - 5 Avenue SW
Calgary, AB T2P 2X6

(Sunshine, or the Licensee)

WHEREAS Sunshine is the holder of Business Associate (BA) code A2TF, and holds licences and approvals granted by the Alberta Energy Regulator (AER, or the Regulator) under the *OGCA*, the *Oil Sands Conservation Act (OSCA)*, the *Pipeline Act*, and the *Environmental Protection and Enhancement Act (EPEA)*;

WHEREAS Sunshine holds Commercial Scheme Approval 11764H (the Scheme Approval) issued pursuant to the *OSCA* to recover bitumen through steam-assisted gravity drainage (SAGD) processes, in the development area outlined in Appendix A of the Scheme Approval (the West Ells Facility);

WHEREAS Sunshine holds *EPEA* approval 00266890-01-00, as amended (the *EPEA* Approval) for the “construction, operation, and reclamation of the West Ells enhanced recovery in-situ oil sands or heavy oil processing plant” and is subject to approval conditions to mitigate risks to the environment associated with the operation of the West Ells Facility;

WHEREAS there is physical infrastructure associated with the West Ells Facility, including wells, well pads, pipelines, facilities and facility sites (the Sites);

WHEREAS Sunshine is the licensee and operator of the wells and facilities licensed under the *OGCA*, and the pipelines licensed under the *Pipeline Act*, as listed in Appendix 1 (collectively, the Licences);

Turbines in Disrepair

WHEREAS the West Ells Facility has two cogeneration units for generating power for the operation of the West Ells Facility (collectively, the Turbines);

WHEREAS on November 7, 2022, Sunshine reported that it had been operating the West Ells Facility cogeneration unit # 2 (the North Turbine) while the respective Heat Recovery Steam Generator (HRSG)

was inoperable due to being in disrepair (FIS 20222509) contrary to its *EPEA* Approval, as the conditions which permit the North Turbine HRSG to be bypassed did not apply;

WHEREAS on April 13, 2023, Sunshine advised the AER that cogeneration unit # 1 (the South Turbine) was unreliable and therefore not in continuous use, which requires the operation of the North Turbine, despite the North Turbine HRSG being inoperable;

WHEREAS on September 10, 2024, Sunshine reported to the AER (FIS 20242167) that the South Turbine was inoperable and required repairs and on September 26, 2024, Sunshine advised the AER that it would not perform the repairs necessary to resume operation of the South Turbine due to the costs associated with the repairs;

WHEREAS, as of the date of this Order, repairs necessary to resume operation of the South Turbine remain outstanding and the repairs of the North Turbine HRSG remain outstanding and Sunshine continues to operate the North Turbine while the HRSG is bypassed, in contravention of the *EPEA* Approval;

Secondary Containment Integrity

WHEREAS on May 31, 2023, Sunshine self-disclosed that the piling boots associated with the secondary containment for four tanks at the West Ells Facility required repairs;

WHEREAS on November 30, 2023, Sunshine advised the AER that the tanks contained within the secondary containment would be taken out of service to mitigate the risk of fluids releasing from the tanks and the secondary containment while the piling boots were in disrepair;

WHEREAS on October 16, 2024, an AER Inspector observed that Sunshine had put a tank back into service without adequate secondary containment and despite the piling boots continuing to be in disrepair, contrary to Section 4.2 of *Directive 055: Storage Requirements for the Upstream Petroleum Industry*;

Pipeline Integrity

WHEREAS on October 16, 2024, an AER inspector conducted an inspection at the West Ells Facility (FIS 548951) and observed that steam was actively releasing from a pipeline, licence no. 55095, from three separate locations along the operating pipeline;

WHEREAS during their inspection at the West Ells Facility on October 16, 2024, an AER inspector was told by a Sunshine operator that they had been aware of the releases since October 12, 2024. Sunshine was issued a notice of noncompliance for failing to immediately report three separate releases from pipeline licence 55095, as required by the *Pipeline Act* and *Rules*;

WHEREAS on October 22, 2024, an AER inspector inspected pipeline licence no. 55095 (FIS 549080) and found Sunshine had not investigated the pipeline releases as required, could not demonstrate it was

inspecting and maintaining the right-of-way (ROW) or patrolling the pipeline, did not have a leak detection program, and could not provide documentation for integrity management of its pipelines as required under the *Pipeline Act and Rules*;

Other Noncompliances

WHEREAS between April 30, 2022, and September 10, 2024, Sunshine has contravened the *EPEA* Approval monitoring and reporting conditions 19 times, as detailed in Table 1 of Appendix 2: Contraventions (Appendix 2);

WHEREAS Sunshine failed to submit its 2023 Annual Water User Report by the deadline, as detailed in Table 1 of Appendix 2;

WHEREAS Sunshine has failed to pay the full invoiced amounts for the 2022, 2023 and 2024, Orphan Fund Levy (OFL), and the 2023 and 2024 Administration Fee (the Outstanding Debt) by the respective deadlines as detailed in Table 4 of Appendix 2;

WHEREAS as of October 22, 2024, seventeen (17) of Sunshine's wells are non-compliant with the requirements for inactive wells per *Directive 013: Suspension Requirements for Wells (Directive 013)*, as detailed in Table 3 of Appendix 2;

Closure Work

WHEREAS on June 12, 2023, the AER issued a Notice of Noncompliance to Sunshine for failing to meet its 2022 annual Mandatory Closure Spend Quota (MCSQ) as required under section 4.1(3) of *Directive 088: Licensee Life-Cycle Management (Directive 088)*, and whereas Sunshine was required to submit a security deposit within 30 days to come into compliance;

WHEREAS on November 2, 2023, the AER imposed Global Refer Status in response to Sunshine's noncompliance with the 2022 annual MCSQ and to date Sunshine has failed to come into compliance;

WHEREAS on April 25, 2024, the AER issued a Notice of Noncompliance to Sunshine for failing to meet its 2023 annual MCSQ, and whereas Sunshine was required to submit a security deposit within 30 days to come into compliance;

WHEREAS on September 17, 2024, the AER restricted Sunshine's eligibility to hold licences in response to Sunshine's failure to meet its 2022 and 2023 annual MCSQ and to date Sunshine has failed to come into compliance;

Licensee Capability

WHEREAS on September 3, 2024, Sunshine indicated that the repairs to the North Turbine HRSG and the repairs of the piling boots had been delayed due to financial constraints;

WHEREAS Sunshine cited a lack of funds as the cause in nine (9) of the contraventions detailed in Table 1 of Appendix 2;

WHEREAS the AER requested a meeting to discuss concerns regarding Sunshine's overall compliance and its ability to operate, held on April 11, 2024 (the April Meeting);

WHEREAS in the April Meeting, Sunshine confirmed that it was unable to submit reports required under the *EPEA* Approval by the required deadlines as third-party service providers would not release the reports that they had generated until Sunshine paid its outstanding invoice balances;

WHEREAS in the April Meeting, Sunshine confirmed that insurance had not been in place since 2020;

WHEREAS on May 30, 2024, the AER held a meeting with Sunshine to discuss actions the AER was considering taking, including limiting Sunshine's licence eligibility and requiring security, to mitigate the assessed risk posed by Sunshine (the May Meeting);

WHEREAS Sunshine provided a written response to the May Meeting on June 7, 2024, and June 14, 2024, stating that Sunshine was planning to make payments towards the Outstanding Debt owed to the AER and OWA by the end of June;

WHEREAS on June 19, 2024, the AER met with Sunshine to advise that the AER was considering restricting Sunshine's licence eligibility (the June Meeting);

WHEREAS on June 20, 2024, Sunshine provided a written response to the June Meeting, outlining a plan to make payments to the AER for the Outstanding Debt;

WHEREAS on June 21, 2024, the AER decided to defer the decision to limit Sunshine's licence eligibility to allow time for Sunshine to come into compliance with its Outstanding Debt;

WHEREAS, as of October 11, 2024, Sunshine's plan to make payments to the AER was deficient and Sunshine continues to have its Outstanding Debt, with the total outstanding amounts being \$50,370.25 for the Orphan Fund Levies and \$70,056.59 for the Administration Fees, as detailed in Table 4 of Appendix 1;

WHEREAS as of September 30, 2024, the AER was aware that Sunshine has municipal tax arrears of approximately \$34,826,124;

WHEREAS, due in part to Sunshine's failure to conduct maintenance and repairs required for normal operation, to pay for services required to satisfy the *EPEA* Approval conditions, to adequately fund expenses that are typical for normal operation, and for unskilled operation of its assets, Sunshine has been unable to achieve the estimated 5000 boe/d potential production of the West Ells project, averaging only 1102 boe/d over the past three years and 971 boe/d in 2024, as of October 29, 2024;

WHEREAS on March 12, 2024, the AER performed a Holistic Assessment of Sunshine, including the following factors: financial health, management and maintenance of regulated infrastructure and sites, compliance with operational requirements, rate of closure activities, pace of inactive liability growth, and compliance with administrative regulatory requirements, including the management of debts (the LCA Factors) and determined that Sunshine is highly financially distressed, with inactive liabilities representing 75.9% of its total liabilities;

WHEREAS per section 1.100(2) of the *OGCR*, the Regulator may require a licensee to provide a security deposit at any time where the Regulator considers it appropriate to do so to offset the estimated costs of abandoning and reclaiming a well or facility and of carrying out any other activities necessary to ensure the protection of the public and environment;

WHEREAS per section 6 of *Directive 088*, the AER will consider the Holistic Assessment when considering whether to require a security deposit to mitigate the potential risks of the licensee being unable to meet its regulatory responsibilities across the energy lifecycle;

WHEREAS the AER has reviewed the LCA Factors and is of the opinion that Sunshine does not have the capability to meet its regulatory and liability obligations across the energy development lifecycle, and poses a risk to public safety and the environment;

WHEREAS Colin Woods, Manager of Field Operations East (the Manager), has the authority to issue orders under the *OGCA*, and the *Pipeline Act*;

WHEREAS based on the above, the Manager has reasonable grounds to believe that Sunshine has contravened regulations and rules under the jurisdiction of the AER and that it is necessary and appropriate to impose terms and conditions on Sunshine to address those contraventions;

WHEREAS based on the above, including Sunshine's compliance history and indications of financial distress, the Manager is of the opinion that Sunshine is not providing reasonable care and measures in a manner satisfactory to the Regulator and finds it necessary to impose terms and conditions to prevent impairment or damage in respect of the Sites;

WHEREAS based on the assessed inability of Sunshine to meet its regulatory and liability obligations across the energy lifecycle, the Manager considers it appropriate to require Sunshine to provide a security deposit to offset the estimated costs of abandoning and reclaiming a well or facility and of carrying out any other activities necessary to ensure the protection of the public and the environment;

WHEREAS the Manager has reviewed the evidence including, but not limited to, indications of financial distress, the assessed inability of Sunshine to provide reasonable care and measures for the sites, and to meet its regulatory and liability obligations across the energy lifecycle;

WHEREAS the Manager has concluded that Sunshine poses a risk to public safety and the environment, and it is necessary to suspend the wells and facilities, and discontinue the pipelines in Appendix 1 to ensure public safety and protection of the environment;

Therefore, I, Colin Woods, Manager, Field Operations East, under sections 22, 26.2, and 27 of the *OGCA*, section 1.100 of the *OGCR*, and sections 22.1 and 23 of the *Pipeline Act*, do hereby order the following:

Suspension

1. All wells, facilities, and pipelines listed in Appendix 1 are hereby suspended.
 - a. All the wells and facilities associated with the West Ells Facility must be suspended following safe industry practices sufficient for winter conditions and in accordance with AER rules and regulations within **fourteen (14) days** from the date of this Order.
 - b. All other wells and facilities not associated with the West Ells Facility must be suspended following safe industry practices sufficient for winter conditions and in accordance with AER rules and regulations within **fourteen (14) days** from the date of this Order.
 - c. All pipelines shall be discontinued following safe industry practices and in accordance with the *Pipeline Act* and the *Pipeline Rules* within **fourteen (14) days** of the date of this Order.
2. Any hazards on the Sites that present a risk to public safety or the environment must be immediately reported to the AER and addressed in a manner acceptable to the AER no later than **fourteen (14) days** from the date of this Order.
3. Sunshine shall ensure that any containment devices or equipment including, but not limited to, tanks, vessels, pipelines, lease piping, sumps, drains, tubs, containers, pits or containment rings on any of the Sites are depressurized, emptied and rendered safe in a manner sufficient for winter conditions and acceptable to the AER no later than **fourteen (14) days** from the date of this Order.
4. Sunshine shall provide written confirmation to the Manager, within **sixteen (16) days** from the date of this Order, that the activities required by clauses 1, 2, and 3 have been completed.

Reasonable Care and Measures

5. Sunshine shall submit a Subsurface Action Plan to monitor or take preventative action to detect or prevent a subsurface loss of containment within **fourteen (14) days** from the date of this Order and shall implement the Subsurface Action Plan upon acceptance by the AER.

6. Sunshine shall immediately provide written confirmation to AER Field Operations Northeast that its 24-hour emergency number will remain in service and will initiate an immediate response.
7. Sunshine must ensure it maintains reasonable and adequate insurance as required under section 4.2 of *Directive 067* and inform the AER immediately if insurance is reduced or discontinued.
8. Sunshine must provide records verifying that it meets the requirements of section 8 of *Directive 071: Emergency Preparedness and Response* within **five (5) days** of the date of this Order.
9. Sunshine shall ensure that the West Ells Facility is properly and adequately staffed and that persons in control of all operations possess the necessary skills to ensure reasonable care and measures are provided, and that additional services are available if on-site support is required in the event of an incident.
10. Sunshine shall monitor and inspect equipment daily at the West Ells Facility to ensure reasonable care and measures are provided and any issues are identified and remedied.
11. Within **fourteen (14) days** from the date of this Order, Sunshine must submit, to the satisfaction of the Manager, a Reasonable Care and Measures Plan (RCAM Plan) to demonstrate that reasonable care and measures are being provided at the Sites. The RCAM Plan must include, at a minimum:
 - a. Steps that will be taken to ensure all outstanding contraventions are addressed, including timelines;
 - b. Steps that will be taken to ensure all monitoring and reporting required under Sunshine's West Ells Facility *EPEA* approval is completed and submitted by the applicable deadlines;
 - c. Specific actions to ensure Sunshine will respond to future noncompliances, incidents, information requests, and required reporting by the deadlines set by the AER;
 - d. Specific actions that will be taken to ensure Sunshine is able to adequately respond in the event of an incident or emergency;
 - e. Specific actions that will be taken to ensure Sunshine is able to adequately maintain its pipelines and to identify and adequately respond in the event of a pipeline incident;
12. Sunshine must implement the RCAM Plan as authorized unless otherwise directed by the Manager in writing.

Security

13. Within **fourteen (14) days** from the date of this Order, Sunshine shall post a security deposit in the amount of \$6,091,318.00, which represents 100% of Sunshine's inactive liability as of March 15, 2024, to offset the estimated costs of abandoning and reclaiming a well or facility and of carrying out any other activities necessary to ensure the protection of the public and environment.

Reactivation Plan

14. Prior to the Manager considering lifting the suspension portion of this Order, Sunshine must submit to the satisfaction of the Manager, a Reactivation Plan for Manager review. At a minimum, the Reactivation Plan must include details of actions and timelines for completions of these actions, to:
 - a. Address all remaining outstanding noncompliances and approval requirements;
 - b. Safely reactivate the Sites, including verifying the integrity of Sunshine's wells, facilities, and pipelines, prior to resumption of operation;
 - c. Demonstrate compliance with regulatory requirements and the ability to resume and maintain all actions related to reasonable care and measures.
15. The Reactivation Plan must be implemented as authorized by the Manager.

Reporting

16. All plans and information required in this Order shall be submitted to the attention of Colin Woods at FieldOpsNortheast@aer.ca.
17. If requested by the Manager, Sunshine shall submit, within **two (2) business days**, any records or information or updates pertaining to this Order in the format specified by the AER.

General

18. Failure to comply with this Order may result in escalation of enforcement, which could include an abandonment order.
19. All submissions of work related to work required in this Order shall be submitted in the format, and to the appropriate AER system, as required by AER regulations and the Manager, where specified.

20. Where a deadline or reporting frequency has been specified in this Order, the Manager may authorize in writing a different deadline or reporting frequency as applicable.
21. In carrying out the requirements of this Order, Sunshine shall obtain and comply with all required federal, provincial, or municipal permits and governing legislation and provide to the AER all authorizations obtained upon request by the AER.
22. All applicable regulatory requirements are to be followed and complied with in the undertaking of any actions or directions prescribed under this Order.

Dated at the town of Bonnyville in the Province of Alberta, the 14th day of November, 2024.

<original signed by>

Colin Woods
Manager, Field Operations East
Alberta Energy Regulator

In complying with this order, the party or parties named must obtain all approvals necessary, notwithstanding the above requirements.

This order in no way precludes any enforcement actions being taken regarding this matter under the *OGCA*, *OGCR*, the *Pipeline Act*, or any other provincial or federal legislation, or by any other regulator with jurisdiction.

All enforcement actions issued by the AER may be subject to a follow-up review to confirm previous commitments have been completed and measures have been implemented, to ensure similar noncompliances are prevented in the future. The AER may request any information that demonstrates steps have been taken to prevent repeat noncompliances from occurring.

Under the *Responsible Energy Development Act*, an eligible person may appeal decisions that meet certain criteria. Eligible persons and appealable decisions are defined in section 36 of the *Responsible Energy Development Act* 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 according to the AER's requirements. You can find filing requirements and forms on the AER website, www.aer.ca, under Regulating Development: Project Application: Regulatory Appeal Process.

Appendix 1

Licences held by the Licensee

Table 1 Wells

Licence	Unique Well Identifier	Status	Surface Location	WIP Current Name	WIP Interest
W0455426	F1/06-08-090-20W4/0	Suspension	06-08-090-20W4	Sunshine Oilsands Ltd.	100%
W0455142	00/06-14-096-18W4/0	Amended	06-14-096-18W4	Sunshine Oilsands Ltd.	100%
W0455131	06/09-31-094-17W4/0	Suspension	16-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455130	13/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455129	12/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455128	11/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455127	10/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455126	09/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455125	08/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0455124	13/11-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454990	00/09-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454989	07/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454988	06/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454987	05/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454986	04/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454985	03/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454984	02/10-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0454983	12/11-31-094-17W4/0	Suspension	15-30-094-17W4	Sunshine Oilsands Ltd.	100%

W0453700	11/11-31-094-17W4/0	Issued	11-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0453655	00/02-31-094-17W4/0	Issued	02-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0452861	04/03-31-094-17W4/0	Issued	03-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0452860	02/06-31-094-17W4/0	Issued	06-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0450611	02/07-31-094-17W4/0	Issued	07-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0450610	00/07-31-094-17W4/0	Issued	07-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0450237	00/10-31-094-17W4/0	Issued	10-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0448921	10/11-31-094-17W4/0	Issued	14-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448920	09/11-31-094-17W4/0	Issued	14-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448919	08/11-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448918	07/11-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448917	13/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448916	12/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448915	11/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448904	06/11-31-094-17W4/0	Issued	14-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448903	05/11-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448902	04/11-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448901	03/11-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448900	07/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448899	06/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448898	05/12-31-094-17W4/0	Issued	13-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0448794	00/04-31-094-17W4/0	Issued	04-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0447542	00/05-31-094-17W4/0	Issued	05-31-094-17W4	Sunshine Oilsands Ltd.	100%

W0447530	03/03-31-094-17W4/0	Amended	03-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0447520	00/12-31-094-17W4/0	Issued	12-31-094-17W4	Sunshine Oilsands Ltd.	100%
W0446038	00/11-31-094-17W4/0	Amended	14-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0446037	02/11-31-094-17W4/0	Amended	14-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0444605	00/09-04-099-21W4/0	Suspension	09-04-099-21W4	Sunshine Oilsands Ltd.	100%
W0444397	F1/07-21-096-18W4/0	Issued	07-21-096-18W4	Sunshine Oilsands Ltd.	100%
W0444287	F1/01-20-096-18W4/0	Issued	01-20-096-18W4	Sunshine Oilsands Ltd.	100%
W0443997	F1/04-09-090-19W4/0	Suspension	04-09-090-19W4	Sunshine Oilsands Ltd.	100%
W0443105	00/05-30-094-17W4/0	Amended	05-30-094-17W4	Sunshine Oilsands Ltd.	100%
W0441512	00/09-25-094-18W4/0	Amended	09-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441511	00/10-25-094-18W4/0	Amended	10-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441510	00/08-25-094-18W4/0	Amended	08-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441509	03/08-25-094-18W4/0	Amended	08-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441508	02/08-25-094-18W4/0	Amended	08-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441507	00/07-25-094-18W4/0	Amended	07-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441505	10/02-25-094-18W4/0	Amended	02-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441504	14/01-25-094-18W4/0	Amended	01-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0441091	00/11-12-099-21W4/0	Amended	11-12-099-21W4	Sunshine Oilsands Ltd.	100%
W0441090	00/09-22-100-21W4/0	Amended	09-22-100-21W4	Sunshine Oilsands Ltd.	100%
W0441089	00/08-12-100-21W4/0	Amended	08-12-100-21W4	Sunshine Oilsands Ltd.	100%
W0441086	00/07-08-100-20W4/0	Amended	07-08-100-20W4	Sunshine Oilsands Ltd.	100%
W0440987	02/10-09-096-18W4/0	Amended	10-09-096-18W4	Sunshine Oilsands Ltd.	100%
W0440985	00/07-21-096-18W4/0	Amended	07-21-096-18W4	Sunshine Oilsands Ltd.	100%

W0440983	00/04-17-096-18W4/0	Amended	04-17-096-18W4	Sunshine Oilsands Ltd.	100%
W0440982	00/04-08-096-18W4/0	Amended	04-08-096-18W4	Sunshine Oilsands Ltd.	100%
W0440981	00/01-20-096-18W4/0	Amended	01-20-096-18W4	Sunshine Oilsands Ltd.	100%
W0440810	00/08-03-091-18W4/0	Amended	08-03-091-18W4	Sunshine Oilsands Ltd.	100%
W0440809	00/02-03-091-18W4/0	Amended	02-03-091-18W4	Sunshine Oilsands Ltd.	100%
W0440808	00/02-27-090-18W4/0	Amended	02-27-090-18W4	Sunshine Oilsands Ltd.	100%
W0430655	00/01-33-094-17W4/0	Amended	01-33-094-17W4	Sunshine Oilsands Ltd.	100%
W0430654	00/01-32-094-17W4/0	Amended	01-32-094-17W4	Sunshine Oilsands Ltd.	100%
W0430531	00/11-09-091-01W5/0	Issued	11-09-091-01W5	Sunshine Oilsands Ltd.	100%
W0430474	00/09-16-096-18W4/0	Amended	09-16-096-18W4	Sunshine Oilsands Ltd.	100%
W0429961	00/05-16-096-18W4/0	Amended	05-16-096-18W4	Sunshine Oilsands Ltd.	100%
W0429903	00/14-16-096-18W4/0	Amended	14-16-096-18W4	Sunshine Oilsands Ltd.	100%
W0429650	00/14-27-090-18W4/0	Amended	14-27-090-18W4	Sunshine Oilsands Ltd.	100%
W0429368	00/05-09-096-18W4/0	Amended	05-09-096-18W4	Sunshine Oilsands Ltd.	100%
W0429366	00/02-02-096-18W4/0	Amended	02-02-096-18W4	Sunshine Oilsands Ltd.	100%
W0429190	00/15-33-096-18W4/0	Amended	15-33-096-18W4	Sunshine Oilsands Ltd.	100%
W0429183	00/14-25-094-18W4/0	Amended	14-25-094-18W4	Sunshine Oilsands Ltd.	100%
W0428470	00/02-33-090-18W4/0	Amended	02-33-090-18W4	Sunshine Oilsands Ltd.	100%
W0428468	00/09-29-090-18W4/0	Amended	09-29-090-18W4	Sunshine Oilsands Ltd.	100%
W0428464	00/09-28-090-18W4/0	Amended	09-28-090-18W4	Sunshine Oilsands Ltd.	100%
W0427170	02/12-10-079-20W4/0	Amended	12-10-079-20W4	Sunshine Oilsands Ltd.	100%
W0427139	00/11-36-094-18W4/0	Amended	11-36-094-18W4	Sunshine Oilsands Ltd.	100%
W0427138	00/15-36-094-18W4/0	Amended	15-36-094-18W4	Sunshine Oilsands Ltd.	100%

W0427136	00/01-36-094-18W4/0	Amended	01-36-094-18W4	Sunshine Oilsands Ltd.	100%
W0427131	00/05-36-094-18W4/0	Amended	05-36-094-18W4	Sunshine Oilsands Ltd.	100%
W0427048	00/15-26-078-20W4/0	Amended	15-26-078-20W4	Sunshine Oilsands Ltd.	100%
W0425851	00/11-21-095-24W4/0	Suspension	11-21-095-24W4	Sunshine Oilsands Ltd.	100%
W0418748	00/09-08-096-17W4/0	Amended	09-08-096-17W4	Sunshine Oilsands Ltd.	100%
W0417558	00/09-21-096-18W4/0	Amended	09-21-096-18W4	Sunshine Oilsands Ltd.	100%
W0248993	00/02-30-095-17W4/0	Suspension	01-30-095-17W4	A.J. Blashyn & Associates Ltd.	0.74%
	00/02-30-095-17W4/0	Suspension	01-30-095-17W4	Canadian Natural Resources	6.28%
	00/02-30-095-17W4/0	Suspension	01-30-095-17W4	Sunshine Oilsands Ltd.	89.16%
	00/02-30-095-17W4/0	Suspension	01-30-095-17W4	Tourmaline Oil Corp.	3.82%
W0248989	00/04-29-095-17W4/0	Suspension	01-30-095-17W4	A.J. Blashyn & Associates Ltd.	0.74%
	00/04-29-095-17W4/0	Suspension	01-30-095-17W4	Canadian Natural Resources	6.28%
	00/04-29-095-17W4/0	Suspension	01-30-095-17W4	Sunshine Oilsands Ltd.	89.16%
	00/04-29-095-17W4/0	Suspension	01-30-095-17W4	Tourmaline Oil Corp.	3.82%
W0248972	00/01-30-095-17W4/0	Suspension	01-30-095-17W4	Sunshine Oilsands Ltd.	100%
W0220084	00/05-29-094-17W4/0	Suspension	05-29-094-17W4	Sunshine Oilsands Ltd.	100%
	00/05-29-094-17W4/2	Suspension	05-29-094-17W4	Sunshine Oilsands Ltd.	100%
W0213988	00/01-17-095-17W4/0	Suspension	08-17-095-17W4	Canadian Natural Resources	21.88%
	00/01-17-095-17W4/0	Suspension	08-17-095-17W4	Sunshine Oilsands Ltd.	69.67%
	00/01-17-095-17W4/0	Suspension	08-17-095-17W4	Tourmaline Oil Corp.	8.46%
W0212853	00/07-20-095-17W4/0	Suspension	07-20-095-17W4	Canadian Natural Resources Limited	21.87%
	00/07-20-095-17W4/0	Suspension	07-20-095-17W4	Sunshine Oilsands Ltd.	69.67%
	00/07-20-095-17W4/0	Suspension	07-20-095-17W4	Tourmaline Oil Corp.	8.46%

W0121786	00/15-35-093-21W4/0	Suspension	15-35-093-21W4	Sunshine Oilsands Ltd.	100%
W0112885	00/03-31-094-17W4/0	Suspension	03-31-094-17W4	Canadian Natural Resources	21.88%
	00/03-31-094-17W4/0	Suspension	03-31-094-17W4	Sunshine Oilsands Ltd.	69.67%
	00/03-31-094-17W4/0	Suspension	03-31-094-17W4	Tourmaline Oil Corp.	8.46%
W0112674	00/09-35-094-18W4/0	Suspension	09-35-094-18W4	Sunshine Oilsands Ltd.	100%
W0112354	00/05-24-094-18W4/0	Suspension	05-24-094-18W4	Canadian Natural Resources	21.88%
	00/05-24-094-18W4/0	Suspension	05-24-094-18W4	Sunshine Oilsands Ltd.	69.67%
	00/05-24-094-18W4/0	Suspension	05-24-094-18W4	Tourmaline Oil Corp.	8.46%
W0105972	00/04-05-095-17W4/0	Suspension	04-05-095-17W4	Canadian Natural Resources	21.88%
	00/04-05-095-17W4/0	Suspension	04-05-095-17W4	Sunshine Oilsands Ltd.	69.67%
	00/04-05-095-17W4/0	Suspension	04-05-095-17W4	Tourmaline Oil Corp.	8.46%
W0104782	00/11-09-096-17W4/0	Suspension	11-09-096-17W4	Sunshine Oilsands Ltd.	100%
W0100331	00/10-02-096-18W4/0	Suspension	10-02-096-18W4	A.J. Blashyn & Associates Ltd.	0.74%
	00/10-02-096-18W4/0	Suspension	10-02-096-18W4	Canadian Natural Resources	6.28%
	00/10-02-096-18W4/0	Suspension	10-02-096-18W4	Sunshine Oilsands Ltd.	89.16%
	00/10-02-096-18W4/0	Suspension	10-02-096-18W4	Tourmaline Oil Corp.	3.82%
W0081557	00/11-12-096-18W4/0	Suspension	11-12-096-18W4	Sunshine Oilsands Ltd.	100%

Table 2 Pipelines

Licence	Segment	From Surface Location	To Surface Location	Status
P54810	1	01-30-095-17W4	04-13-095-18W4	Discontinued
	2	03-31-094-17W4	03-31-094-17W4	Discontinued
	3	10-02-096-18W4	10-34-095-18W4	Discontinued
P54825	1	10-31-094-17W4	14-30-094-17W4	Operating
	2	14-30-094-17W4	14-30-094-17W4	Operating
P54885	1	10-33-094-17W4	16-32-094-17W4	Operating

	2	16-32-094-17W4	16-32-094-17W4	Operating
	3	14-32-094-17W4	03-04-095-17W4	Operating
	4	16-32-094-17W4	10-31-094-17W4	Operating
P54889	1	11-31-094-17W4	10-31-094-17W4	Operating
P55094	1	14-30-094-17W4	14-30-094-17W4	Operating
P55095	1	10-31-094-17W4	14-30-094-17W4	Operating
	1	10-31-094-17W4	14-30-094-17W4	Operating
P55096	1	14-30-094-17W4	14-30-094-17W4	Operating
	2	14-30-094-17W4	10-31-094-17W4	Operating
P55132	1	14-30-094-17W4	10-31-094-17W4	Operating
P55133	1	14-30-094-17W4	14-30-094-17W4	Operating
P56059	1	04-05-095-17W4	03-31-094-17W4	Discontinued
	2	05-24-094-18W4	07-26-094-18W4	Discontinued
	3	09-35-094-18W4	07-26-094-18W4	Discontinued
	4	07-20-095-17W4	08-17-095-17W4	Discontinued
	5	07-26-094-18W4	03-31-094-17W4	Discontinued
P56060	1	08-17-095-17W4	11-11-095-18W4	Discontinued
P56061	1	15-35-093-21W4	04-01-094-21W4	Discontinued

Table 3 Facilities

Licence	Surface Location	Status
F25331	04-13-095-18W4	Inactive
F42557	11-21-095-24W4	Inactive
F44352	10-31-094-17W4	Active
F46035	14-30-094-17W4	Active

Appendix 2: Contraventions

Table 1 EPEA and Water Act Contraventions

Date	Incident/FIS Number	Details	Date Resolved
2022-04-30 Reported on 2022-05-02	20221035	<ul style="list-style-type: none"> • EPEA approval contravention: missing Continuous Emissions Monitoring (CEMS) report. • Failed to submit March CEMS data on time. • Data was recorded but was not retrieved due to technical issues with the site network. • Cause was equipment failure. 	2022-11-30
2022-11-06 Reported on 2022-11-23	20222665	<ul style="list-style-type: none"> • EPEA approval contravention: CEMS requirement. • CEMS failed to meet 90% operational availability for November, 2022. • Cause was lack of training. 	2023-01-10
2022-11-07 Reported on 2022-11-07	20222509	<ul style="list-style-type: none"> • EPEA approval contravention: unable to meet EPEA requirement to only use turbine bypass stack when cogeneration unit is starting up, shutting down, undergoing maintenance, or in the event of an emergency. • Repairs are needed on Cogenerator # 2 and only the turbine portion is in operation. Cogenerator # 1 is down for maintenance and not in operation at this time. North turbine is in operation. • Sunshine tried to seek a variance of the requirement but was denied. 	2024-06-10
2022-12-31 Reported on 2023-03-14	20230622	<ul style="list-style-type: none"> • EPEA approval contravention: monitoring deficiency. • Failed to perform a Manual Stack Survey (MSS) on one of the cogeneration units in 2022. • Performance testing was scheduled for second half of the year. Due to unreliable operation of Cogeneration Unit #1, only the turbine portion of Cogeneration Unit #2 was operated consistently. There is no testing port on the Cogeneration Unit # 1 turbine stack. • Cause: less than reliable cogeneration equipment and low steam demand. 	2023-06-01
2022-12-31	20230063	<ul style="list-style-type: none"> • EPEA approval contravention: CEMS requirement. 	2023-06-19

Reported on 2023-01-03		<ul style="list-style-type: none"> Failed to perform the second Cylinder Gas Audit (CGA) in 2022. Third party technician unable to perform CGA on December 31, 2022. Sunshine did not have an E/I technician on site. Cause: third party availability. 	
Reported on 2023-02-28 2023-03-01	20230507	<ul style="list-style-type: none"> EPEA approval contravention: late CEMS and Passive Air Monitoring report. Failed to submit January CEMS data and Passive Air Monitoring on time. Sunshine was unable to pay the invoices for services and third parties withheld the data. Sunshine identified cause as financial. 	2023-08-10
Reported on 2023-03-31 2023-04-03	20230783	<ul style="list-style-type: none"> EPEA approval contravention: late CEMS and Passive Air Monitoring report. Failed to submit February CEMS data and Passive Air Monitoring on time. Sunshine was unable to pay the invoices for services and third parties withheld the data. Sunshine identified cause as financial. 	2023-08-10
Reported on 2023-04-30 2023-05-01	20231042	<ul style="list-style-type: none"> EPEA approval contravention: late CEMS and Passive Air Monitoring report. Failed to submit March CEMS data and Passive Air Monitoring on time. Sunshine was unable to pay the invoices for services and third parties withheld the data. Sunshine identified cause as financial. 	2023-11-30
Reported on 2023-05-23 2023-05-23	20231301	<ul style="list-style-type: none"> EPEA approval contravention: did not provide a minimum of two weeks notice prior to the Relative Accuracy Test Audit (RATA) First RATA of 2023 was scheduled for May 29-31. Competing priorities caused the person responsible for the notification to miss the notification window. Cause was human error. 	2023-11-30
Reported on 2023-06-01 2023-06-01	20231402	<ul style="list-style-type: none"> EPEA approval contravention: late CEMS report. Failed to submit April CEMS data on time. Sunshine was unable to pay the invoices for services and third parties withheld the data. Sunshine identified cause as financial. 	2023-11-30
Reported on 2023-09-01 2023-10-27	20232722	<ul style="list-style-type: none"> EPEA approval contravention: CEMS requirement. Analyzer availability for September not met. The 85 MW steam generator was down from June 2023 until restart on September 29. Analyzer was in an out of control state when the unit came online. 	2023-11-23

		<ul style="list-style-type: none"> • Cause: calibration gas for CEMS was shut off to conserve the gas while steam generator was down. When calibration was restarted the technician failed to recognize the out of control state. Only 1 instrument technician was on shift and priorities were focused on tuning the steam generator and safely resuming operations. 	
2023-12-22 Reported on 2024-01-31	20240363	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: limits exceeded. • NOx limit exceedance when using mixed gas. • Co-generator Unit # 1 tripped on December 20 causing the 85 MW Steam Generator to trip. While restarting the flue gas recirculation (FGR) damper positioner lost its configuration and had to be replaced. • Technician ran into issues getting new positioner to work properly resulting in a manual adjustment. • Cause: manual adjustments of the FGR. No night shift coverage for instrument technicians. 	2024-04-04
2024-01-08 Reported on 2024-03-05	20240673	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: unauthorized activity. • North turbine bypass exhaust stack was operated for 8 days without authorization. • The south co-generation unit failed on January 8. After several re-start attempts, the north turbine was started. • Sunshine identified cause as lack of funds. 	2024-06-11
2024-02-29 Reported on 2024-02-29	20240675	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: late CEMS report. • Failed to submit January CEMS data on time. • Sunshine was unable to pay the invoices for services and third parties withheld the data. • Sunshine identified cause as lack of funds. Repair plan valid but delayed. 	2024-04-18
2024-02-29 Reported on 2024-03-05	20240671	<ul style="list-style-type: none"> • <i>EPEA</i> and <i>Public Lands Act</i> approval contraventions: weeds not being actively managed. • After several years of ineffective weed control, Sunshine was given until March 1, 2024, to implement a more robust and effective vegetation management program. • Sunshine was unable to pay the invoices for third party services, and the program development was not completed. • Sunshine identified cause as lack of funds. 	2024-06-11
2024-02-29 Reported on	20240627	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: late Passive Air Monitoring report. • Failed to submit January Passive Air Monitoring data on time. 	2024-04-04

2024-02-29		<ul style="list-style-type: none"> • Sunshine was unable to pay the invoices for services and third parties withheld the data. • Sunshine identified cause as lack of funds. 	
2024-03-31 Reported on 2024-04-01	20240869	<ul style="list-style-type: none"> • Water Act Licence No. 00316770-02-00 approval contravention: late Annual Water Use report. • Failed to submit the 2023 Annual Water Use report as required under section 4.10 of the above Water Act Licence. • Sunshine does not have a groundwater professional on staff. • Sunshine was unable to pay the invoices for services and third parties withheld the data. • Sunshine identified cause as lack of funds. 	2024-04-30
2024-07-18	20241869	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: CEMS requirement. • 90% availability of CEMS analyzer not met for June, 2024. • Alternate fuel values were above <i>EPEA</i> approval limit, detected by third party while validating data. • No cause identified 	2024-08-29
2024-09-09	20242167	<ul style="list-style-type: none"> • <i>EPEA</i> approval contravention: unauthorized activity. • The north turbine bypass exhaust stack was operated for 8 days without authorization. • Cause is under investigation. 	2024-10-24

Table 2: Outstanding Field Inspections

Date	Incident/FIS Number	Details	Date Resolved
2022-06-08	521339	<ul style="list-style-type: none">Breached berm had not been repaired, pond had formed on back of pad.Extensive vegetation in secondary containment.Reinspected on July 7, 2023, some work had been done with vegetation, pond level being managed.Reinspection on March 28, 2024, berm had been repaired.Reinspection on May 27, 2024, vegetation regrowth, vegetation around flare stack.Reinspection October 16, 2024, vegetation remains an issue, pond still present, no maintenance in the secondary containment.	Unresolved
2022-08-30	523126	<ul style="list-style-type: none">Inactive wells not suspended according to <i>Directive 013</i> requirements.Inspection requirements not met for W0425851.Casing and tubing pressures not recorded.Action plan provided on December 14, 2022, but was found deficient. Revised plan provided January 12, 2023, but was found deficient, with revisions due January 31, 2023.Action plan provided on March 21, 2023, and was accepted. Sunshine was to provide bi-monthly updates.Well W0425851 was inspected again on November 7, 2023 and still noncompliant with D013.Sunshine replied on March 26, 2024: “Due to resource constraints, Sunshine is unable to take immediate corrective actions at this time.” And “Sunshine is aiming to complete abandonment of these wells by December 2024/January 2025, subject to funding availability.”	Unresolved
2023-05-23	531517	<ul style="list-style-type: none">Requires weed control within the CPF around the well pad.Vegetation remains around flare stack.Vegetation within tank secondary containment.VSD received for boot repair, with deadline of July 30, 2023.	Unresolved
2024-09-05	547754	<ul style="list-style-type: none">Weed management at the well pad, CPF and around pond requires attention.	Unresolved

		<ul style="list-style-type: none"> • Inspection noted that there was no work towards addressing outstanding issues, all deadlines have been extended and VSD commitment is still unmet. 	
2024-10-16	548942	<ul style="list-style-type: none"> • Sunshine did not report 3 separate releases from pipeline licence 55095. 	Unresolved
2024-10-18	548951	<ul style="list-style-type: none"> • Four tanks observed to have detached boot pilings. Sunshine had previously VSD the issue and reported tanks were not in use. • Floor drain tank was back in service without secondary containment or repair of boot pilings. • Three tanks share inadequate secondary containment. 	Unresolved
2024-10-22	549080	<ul style="list-style-type: none"> • Sunshine could not demonstrate it had investigated the cause of the incident (releases). • Sunshine could not demonstrate it was inspecting, monitoring or maintaining the ROW. • Sunshine could not demonstrate or provide documentation of the frequency and timing of pipeline patrolling. • Sunshine could not provide documentation of integrity management. • Sunshine stated it does not have a leak detection program. • Sunshine did not demonstrate it had promptly investigated the leaks on the pipeline. 	Unresolved

Table 3: Directive 013 Noncompliant Wells as of November 5, 2024

Licence	UWI	Surface Location	System Status	Noncompliance
0081557	00/11-12-096-18W4/2	11-12-96-18W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0100331	00/10-02-096-18W4/0	10-2-96-18W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0104782	00/11-09-096-17W4/0	11-9-96-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0105972	00/04-05-095-17W4/0	4-5-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0112354	00/05-24-094-18W4/2	5-24-94-18W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0112674	00/09-35-094-18W4/0	9-35-94-18W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0112885	00/03-31-094-17W4/0	3-31-94-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0121786	00/15-35-093-21W4/0	15-35-93-21W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0212853	00/07-20-095-17W4/0	7-20-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10

				years\Inspection is overdue
0213988	00/01-17-095-17W4/0	8-17-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0220084	00/05-29-094-17W4/2	5-29-94-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years
0248972	00/01-30-095-17W4/0	1-30-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0248989	00/04-29-095-17W4/0	1-30-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0248993	00/02-30-095-17W4/0	1-30-95-17W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years\Inspection is overdue
0425851	00/11-21-095-24W4/0	11-21-95-24W4	Suspension	Inactive greater than 10 years\ Inspection as per option 1 or option 2 in Directive 013 is overdue
0430531	00/11-09-091-01W5/0	11-9-91-1W5	Issued	Suspension not reported for current inactive period\Inactive greater than 10 years
0443997	F1/04-09-090-19W4/0	4-9-90-19W4	Suspension	Downhole operation not reported on Medium or High Risk Well\Inactive greater than 10 years

Table 4: Outstanding Debts to the AER

Date of Invoice	Deadline	Type of Debt	Amount	Comment
2022-04-11	May 11, 2022	Orphan Fund Levy	\$10,654.87	Including penalty
2023-04-03	May 4, 2023	Orphan Fund Levy	\$19,977.27	Including penalty
2024-04-10	May 10, 2024	Orphan Fund Levy	\$19,738.11	Including penalty
2023-04-03	May 4, 2023	Administration Fee	\$28,848.33	Including penalty
2024-04-01	May 10, 2024	Administration Fee	\$41,208.36	Including penalty