

**GENERAL ORDER 2024-0086-02**  
Section 49 *Energy Resource Activities Act*

**Issued to:**

Pavilion Energy Corp.  
Suite 2150, 736 – 6<sup>th</sup> Ave SW  
Calgary, Alberta T2P 3T7

**Attention:** Cas Morel, President

**Order:**

Pursuant to section 49(1)(d) of the *Energy Resource Activities Act* (the Act), I, Robert Workman, order that Pavilion Energy Corp. (Pavilion) must:

1. No later than November 22, 2024, at 1600hrs PDT, cease all operations at facility ID 00000106 located at 06-19-086-19 (the facility) and isolate the facility.
2. No later than November 22, 2024, at 1600hrs PDT, submit confirmation of shut down and isolation of the facility to the BC Energy Regulator by e-mail to [C&E@bc-er.ca](mailto:C&E@bc-er.ca).

**Conditions:**

- A. This order shall remain in effect until amended or terminated in whole or in part by the BC Energy Regulator (BCER).

**Reasons:**

I make this order for the following reasons:

- i. Pavilion is the permit holder for the facility.
- ii. Pavilion was previously subject to Order 2024-0086-01 issued by the BCER under section 49 of the Act.
- iii. Order 2024-0086-01 required Pavilion to shut in the facility due to excess venting from the thief hatch on production tank 2.
- iv. On September 6, 2024, Pavilion notified the BCER that Pavilion believed the requirements to restart the facility had been met.
- v. On October 9, 2024, BCER staff inspected the facility after it had only been in operation for approximately four days. Use of an imaging infrared camera did not detect emissions from the production tanks. Emissions from the H<sub>2</sub>S scrubber were detected indicating the scrubber system was operating properly.

- vi. Order 2024-0086-01 was terminated by the BCER on October 9, 2024.
- vii. On November 19, 2024, BCER staff inspected the facility after it had built up to full operating pressure. Use of a thermal imaging camera showed gas venting from the top of production tank 2. BCER staff also detected the odor of H<sub>2</sub>S gas off the site of the facility.
- viii. The results of a gas analysis conducted July 31, 2024, by Core Labs at the request of Pavilion, determined the hydrogen sulfide (H<sub>2</sub>S) content of the product coming from WA 03723 and feeding into the facility is 13 200 ppm.
- ix. Section 41(1) of the Drilling and Production Regulation provides that:  
  
A permit holder must not vent gas unless the gas heating value, volume or flow rate is insufficient to support stable combustion and
  - (a) the venting is conducted in a manner that does not constitute a safety hazard,
  - (b) the venting does not cause off-site odours,
  - (c) the quantity of vented gas is minimized, and
  - (d) the duration of venting is minimized.
- x. I am of the opinion that Pavilion has failed to comply with Section 41(1)(b) and (d) of the Drilling and Production Regulation.


### **Review or Appeal**

Pavilion may request a review of this order under section 70 of the Act or appeal this order under section 72 of the Act. Both a review and an appeal of the order cannot be commenced simultaneously.

A request for review may be sent to: [determinationreviews@bc-er.ca](mailto:determinationreviews@bc-er.ca).

Alternatively, a notice of appeal may be sent to the Energy Resource Appeal Tribunal [info@bcerat.ca](mailto:info@bcerat.ca) or mailed to:

Energy Resource Appeal Tribunal  
PO Box 4925 Stn Prov Govt  
Victoria, BC V8W 9V1  
Information regarding the process for appeals may be found at [www.bcerat.ca](http://www.bcerat.ca)



Robert Workman  
Manager, Enforcement  
BC Energy Regulator

DATED AT Fort St. John, in the Province of British Columbia, this 20<sup>th</sup> day of November 2024.