



Canada Energy  
Regulator

Régie de l'énergie  
du Canada

**Imperial Oil Resources N.W.T. Limited  
Variance Application for Operations Authorization  
File Number: 3430830  
Line 490 Corridor Replacement Activities  
File Number: 4669015**

**Hearing Order OH-001-2023  
20 February 2024**

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## 1. Overview of the Applications and the Hearing Process

### 1.1. Operations Authorization OA-1210-001 Variance Application

On 1 November 2023, Imperial Oil N.W.T. Limited (**Imperial**) filed an application ([C27037](#)), to vary the Operations Authorization OA-1210-001 (**OA**) for its Norman Wells Operations (**NWO**), in accordance with subsection 5(6) of the *Canada Oil and Gas Operations Act (COGOA)* and section 383 of the *Canadian Energy Regulator Act (OA Variance)*.

Through the OA Variance application, Imperial seeks to extend the current term of the OA for an additional ten years (to the end of 2034) to allow for the continuation of Imperial's operations at the NWO. Imperial stated it is not proposing any alterations to the NWO operational footprint or industrial processes, nor is it seeking authorization for any closure activities. Imperial further stated that the scope of NWO activities remains unchanged from that described in its previous application that supported the current OA (issued in 2014), and includes:

- the operation of the Central Processing Facility;
- field operations on the mainland field infrastructure including wells, gathering systems and associated infrastructure;
- field operations on the natural and artificial islands including wells, gathering systems and associated infrastructure;
- potential drilling activities which will continue to be evaluated as pattern reviews are completed and new data is incorporated;
- well work conducted on a continuous basis;
- integrity and maintenance activities, routine project work and well work (planned and unplanned activities); and
- progressive reclamation work occurring on an ongoing basis while the facility is in operation.

### 1.2. Line 490 Replacement Activities Application

On 6 February 2024, Imperial filed an application ([C28320-2](#)) requesting approval to conduct pipeline replacement of five lines between Goose and Bear Islands using horizontal directional drilling (**HDD**) as the construction method (**Replacement Activities**).

The Replacement Activities include drilling a single hole between Goose and Bear Islands, approximately 610 to 762 millimetres in diameter (24 to 30 inches), and approximately 1.0 to 1.5 kilometres (**km**) in length. The span of the single bore hole below the Mackenzie River is approximately 0.6 km at the drill location between the two islands. Depth of drilling is planned for at least 15 metres below the lowest point in the riverbed. Imperial stated this depth gives the installed infrastructure more vertical separation from the body of water to minimize the risk of future line exposure.

The steps and deadlines in the hearing, as outlined in this document, are important to ensure the hearing is fair, transparent, inclusive, efficient and provides certainty to all participants.

### 1.3. Where to view the Applications and hearing documents

The Canada Energy Regulator (**CER**) is responsible for regulating oil and gas activities under the COGOA in the Norman Wells Proven Area in the Northwest Territories. The Commission of the CER will hold a single public hearing to consider both the OA Variance and Replacement Activities

applications simultaneously, to the extent possible. During the public hearing the Commission will receive written evidence from Imperial, intervenors and other participants, which will be posted on the hearing record, which is publicly available on the CER website. The hearing will also include an oral portion to allow for oral Indigenous knowledge, which will be transcribed and then placed on the hearing record. The Commission will review and consider all of the relevant evidence on the hearing record before it makes its decision. The Commission relies only on the evidence filed on the hearing record.

Both the OA Variance and Replacement Activities applications and all documents received and issued in OH-001-2023 are referred to as the “**record**” of this hearing. The record includes, for example, Commission correspondence (including this Hearing Order), written evidence and Indigenous knowledge, transcripts, information request responses, notices of motion and responses, and argument. The entire hearing record is found in the one dedicated folder for both applications in the CER’s online [public registry](#). Documents are organized by filer.

Copies of the OA Variance and Replacement Activities applications can be found at the locations and in the formats listed on Imperial’s [website](#). A copy may also be requested from Imperial by contacting their representatives below:

John Gregory  
Conventional Operations Superintendent  
Imperial Oil Resources N.W.T. Limited  
750 Mackenzie Drive Bag 5000  
Norman Wells, NT X0E 0V0  
Email [john.c.gregory@exxonmobil.com](mailto:john.c.gregory@exxonmobil.com)

Nathan Baines  
Senior Legal Counsel  
Imperial Oil Resources N.W.T Limited  
505 Quarry Park Boulevard SE  
Calgary, AB T2C 5N1  
Email [nathan.a.baines@exxonmobil.com](mailto:nathan.a.baines@exxonmobil.com)

#### 1.4. Additional resources

The CER maintains a [webpage](#) with valuable information and links about the applications, including the hearing timeline and project map.

A Process Advisor is available to answer questions and provide process information and assistance on how to effectively participate in the hearing. The role of a Process Advisor is fully described on the [CER’s website](#). The Process Advisor, Tony Epp can be reached by phone at 1-800-899-1265 or by email at [NWOprocesshelp@cer-rec.gc.ca](mailto:NWOprocesshelp@cer-rec.gc.ca).

#### 1.5. Public Information session

CER staff will hold a virtual public information session on **27 February 2024 at 10:00 am Mountain Time** to provide information to the public and Indigenous communities about the hearing and how to participate  
<https://us06web.zoom.us/j/85742051983?pwd=VML5Fo9eE0Oi1aMuqgb3GCUccchLHW.1>.  
For more information, please contact the Process Advisor by phone at 1-800-899-1265 or by email at [NWOprocesshelp@cer-rec.gc.ca](mailto:NWOprocesshelp@cer-rec.gc.ca) .

## 2. Participation

There are two ways of participating in this hearing – either as a **commenter** or as an **intervenor** – each of which is fully described below.

## 2.1. Commenters

Any member of the public may file a letter of comment in this hearing. These letters will appear in the online public registry, will form part of the hearing record, and will be considered by the Commission in making its decisions on the applications.

A letter of comment should:

- be relevant to one or more of the issues identified in **Appendix I or II**;
- state the author's views on the OA Variance application, the Replacement Activities application, or both applications;
- include information or expertise to support the author's views; and
- if the author is impacted, describe how they will be affected by the OA Variance application, the Replacement Activities application, or both.

A commenter can only file **one** letter of comment. There is no page limit to these letters, although clear and well-organized letters are encouraged.

A commenter cannot be asked questions about their letter of comment, nor can they ask questions about other letters of comment or filings made by intervenors or Imperial. Commenters cannot provide argument and they will not be notified of documents filed on the hearing record. As such, commenters must monitor the online public registry if they wish to remain aware of new filings on the hearing record.

Commenters can file their letter of comment through the CER's [Participation Portal](#). All commenters must identify themselves when filing their letter. The deadline for filing a letter of comment is **23 May 2024**.

## 2.2. Intervenors

Following a registration period for the OA Variance application in late 2023 and early 2024, the Commission provided a preliminary List of Parties who could participate in the hearing as intervenors, through Ruling No. 1.

The Commission is now re-opening the registration to participate process until **5 March 2024**. This will provide an opportunity for potential participants to register, including those that may have issues or concerns in relation to the Replacement Activities application.

Indigenous Peoples can register to participate in the hearing process as intervenors at any point throughout the hearing process, however process steps that have been completed cannot be repeated. The List of Parties, which includes Imperial and all intervenors (and their authorized representatives), is found as Filing [C28440](#) and is updated online as necessary.

Intervenors may:

- file written evidence;
- ask written questions about the evidence of Imperial and other intervenors;
- file and respond to notices of motions; and
- provide argument.

Intervenors must answer questions asked about their evidence. Intervenors will be notified of all documents filed on the hearing record.

An intervenor may withdraw at any time in the hearing process by filing a letter with the CER. It is not necessary to explain the reason for withdrawing. Intervenors will continue to receive filing notifications unless and until they formally withdraw.

Participant funding is available to assist intervenors in preparing and providing relevant submissions to the Commission. Please refer to the CER's Participant Funding Program [webpage](#) for more information on eligible recipients, costs, and activities.

### 3. Draft Hearing Steps and Deadlines

#### 3.1. Draft Timetable of Events

The draft steps and deadlines in the hearing process are outlined below. As necessary, the Commission will communicate any changes to steps and/or deadlines through future correspondence, which may take the form of Procedural Updates or rulings on notices of motion.

Hearing step (responsible participant[s] in <b>bold</b> )	Date or Deadline (4:00 pm Mountain time)
<b>Imperial</b> serves Hearing Order, cover letter and copy of applications on parties	Immediately after receiving the List of Parties and Hearing Order
<b>CER</b> Public Information Session	27 February 2024
<b>Intervenors</b> provide Comments on Timetable of Events, Hearing Process and Notice of Intent to provide oral Indigenous knowledge	4 March 2024
<b>Imperial</b> files additional written evidence	7 March 2024
<b>Imperial</b> files reply comments on Timetable of Events (Hearing Process)	7 March 2024
<b>Intervenors</b> submit Information Requests to Imperial	21 March 2024
<b>Imperial</b> responds to the Information Requests	2 April 2024
<b>Commission</b> releases draft conditions	5 April 2024
Oral sessions – <b>Indigenous intervenors</b> provide oral Indigenous knowledge	8-16 April 2024
<b>Indigenous intervenors</b> that provided oral Indigenous knowledge respond to questions	25 April 2024
<b>Intervenors</b> file written evidence	25 April 2024

<b>Imperial and other intervenors</b> file Information Requests to intervenors	9 May 2024
<b>Intervenors</b> file response to Information Requests	23 May 2024
<b>Commenters</b> file letters of comment	23 May 2024
<b>Imperial</b> files written reply evidence	6 June 2024
<b>Commission</b> releases revised draft conditions for comment	6 June 2024
<b>Intervenors</b> file comments on revised draft conditions	20 June 2024
<b>Imperial</b> files comments on revised draft conditions as well as written argument	20 June 2024
<b>Intervenors</b> files written argument	11 July 2024
<b>Imperial</b> files final written reply	18 July 2024

### **3.2. More information on specific steps**

#### **3.2.1. Imperial serves the applications**

With the release of this Hearing Order, Imperial must serve copies of the OA Variance application and the Replacement Activities application and all related documents on each intervenor who has not already received a copy.

#### **3.2.2. Imperial's additional evidence**

By **7 March 2024**, Imperial must file any additional written evidence to supplement its applications for an OA Variance and for the Replacement Activities, and it must also serve a copy on all Intervenors.

#### **3.2.3. Information requests (IRs)**

Imperial and intervenors have the opportunity to ask IRs regarding each other's written evidence. IRs must:

- relate to the evidence that has been filed by the particular party being asked the IR;
- be related to one or more of the issues identified in **Appendix I and II**; and
- be reasonable (the Commission will not compel a party to respond to an IR if it amounts to a "fishing expedition" that could unfairly burden the responding party).

Any party that filed evidence must respond to IRs asked of them about that evidence, provided the IRs meet the above criteria.

#### **3.2.4. Oral Indigenous Knowledge**

The Commission recognizes that communities of Indigenous Peoples share their knowledge and history through an oral tradition passed down from generation to generation. This knowledge and

information is valuable for the Commission's consideration in assessing the OA Variance and Replacement Activities applications and for the Commission to better understand how the applications will impact the rights and interests of Indigenous Peoples, including for example, their current use of lands and resources for traditional purposes.

The Commission appreciates that it may be the preference of Knowledge Keepers and some land users to share this knowledge orally. Time has been allotted in the hearing schedule for Indigenous intervenors that wish to share Indigenous knowledge, which may be in addition to (or instead of) filing written evidence.

Indigenous intervenors are best placed to decide what information they wish to share with the Commission in relation to their rights and interests and concerns they may have about the OA Variance and Replacement Activities applications. The Commission is charged with assessing and determining whether to approve the applications and, if so, under what conditions. In view of that, the Commission encourages Indigenous intervenors to participate and share their oral Indigenous knowledge, especially with regard to their specific rights and interests and the potential impacts of the OA Variance and Replacement Activities applications on those rights and interests.

Indigenous intervenors are invited to share oral Indigenous knowledge in-person or virtually and have been asked to provide comments on their preferred location and timeframe to share this evidence. A form requesting this information can be found in Appendix III attached to the cover letter of this Hearing Order.

### **3.2.5. Intervenors' written evidence**

The Commission's assessment of the OA Variance and Replacement Activities applications will be based solely on the evidence (and argument) it receives. Evidence is used to support one's position in relation to the issues being considered (set out in **Appendix I and II**). Intervenor evidence can include reports; studies; photographs; drawings; or their own knowledge of the lands, the issues being considered, and potential impacts of the applications. Evidence may also include an intervenor's views in relation to Imperial's evidence.

Intervenors must file their written evidence **on or before 25 April 2024** and serve it on Imperial and the other intervenors.

### **3.2.6. Comments on draft conditions**

The Commission will provide opportunities for Imperial and intervenors to comment on draft conditions floated by the Commission, as well as conditions that may be proposed by Imperial or intervenors. **Floating draft conditions for comment does not mean that the Commission will approve the application.**

### **3.2.7. Argument**

Argument is the last opportunity for Imperial and intervenors to present and argue their positions on the OA Variance and Replacement Activities applications.

Parties that provide argument can only discuss evidence – of any party – that is on the hearing record to support their position (e.g., written evidence, oral Indigenous knowledge, IR responses, letters of comment). New evidence cannot be provided in argument and a party cannot question another party's argument. Argument is an opportunity for the parties to:



- summarize their views and opinions on the OA Variance or Replacement Activities applications or both;
- argue about the relevance and weight of any evidence that is before the Commission; and
- make their recommendation as to whether the OA Variance or Replacement Activities application or both should be approved or denied, and under what conditions.

### **3.2.8. Close the hearing record and issuance of decisions**

The hearing record is closed after argument, subject to any outstanding undertakings. This means that no further evidence or submissions will be accepted after argument. Once argument is complete, the Commission then considers all relevant evidence on the hearing record (including oral Indigenous knowledge), and arguments, before making its decisions on the OA Variance and Replacement Activities applications.

## **4. Procedures**

### **4.1. Preparing documents**

Any document filed in this hearing, must be in PDF format with all pages numbered consecutively and must refer to Hearing Order OH-001-2023 and Files 3830830 and 4669015.

Address the document(s) to the proper party. For example, IRs directed at a particular party should be addressed to that party, using the List of Parties as a guide. Filings directed at the Commission (e.g., written evidence, notices of motion) should be addressed to the Secretary of the Commission:

Secretary of the Commission  
Canada Energy Regulator  
Suite 210, 517 Tenth Avenue SW  
Calgary, AB T2R 0A8

If referring to information from a website, do not simply provide the website links. Links may change overtime and the record of that information may be lost. Instead, provide the actual information being referred to and the date the information was taken from the website.

### **4.2. Filing and serving documents**

The CER's preferred method for intervenors to file their documents is through the online Participation Portal (see **Section 4.2.1**) using the CER account that each intervenor created when registering to participate in the hearing. If an intervenor is unable to use the Participation Portal for a particular filing, they may file it through the CER's online e-filing system (see **Section 4.2.2**).

#### **Email is not an accepted method of filing documents.**

As noted throughout this Hearing Order, each party is required to serve their filings on all other parties in the hearing (unless otherwise directed), at the time of or immediately after they make their filings. Electronic service via the Participation Portal and e-filing systems, or by email, is accepted as being equivalent to the service. The method of serving documents differs depending on the filing system used, as outlined below.

If a document cannot be scanned into PDF format (e.g., if it is too large), it can be mailed, faxed, couriered, or delivered by hand to the CER. A copy must also be sent via one of these means to each of the parties. Once received, CER staff will put an electronic placeholder on the online public

registry, which will indicate that a document was filed in hard copy only and is available in the CER's library but cannot be viewed online.

#### 4.2.1. Participation Portal

The Participation Portal offers step-by-step guidance and instructions. However, the following steps provide certain key information for intervenors when filing and serving documents using this system:

- 1) Prepare your documents as explained in **Section 4.1**.
- 2) Sign into your [CER Account](#) using your GCKey user ID and password, which you created when you applied to participate.
- 3) From the list of the hearings you can participate in. Choose "**Imperial – Variance Application and Replacement Activities**", click on "Submit Filing" and follow the instructions.
- 4) In Step 3 - view your filing and decide how you will serve the filing on other intervenors and Imperial. You may choose to have the Participation Portal automatically serve everyone involved that has provided an email address. To make use of this service, click on "Automatically serve copies of my filing to all parties." If you do **not** choose the automated service option, you are required to serve your filing on all parties yourself (unless otherwise directed). This can be done by forwarding (by email) the filing receipt you receive (see Point 6 below) to all contacts on the List of Parties.
- 5) Complete the submission.
- 6) Once confirmed you will receive two emails:
  - a filing receipt where you can verify your attachments; and
  - important instructions, including a reminder to serve your filing on all other parties (unless otherwise directed) and to provide the CER with the necessary hard copy(ies).

#### 4.2.2. E-filing

The e-filing system offers step-by-step guidance and instructions. However, the following steps provide certain key information for intervenors when filing and serving documents using this system:

- 1) Prepare the document(s) as explained in **Section 4.1**.
- 2) Go to the [e-filing system](#) webpage.
- 3) From the list of the applications presented, choose the Imperial OA Variance and Replacement Activities and then follow the instructions.
- 4) Under Step 7 ("Courtesy Copies"), you may enter up to 10 email addresses that you wish to have the system automatically notify when you complete your filing. You are required to serve all contacts on the List of Parties that you do not include in Step 7. This can be done by forwarding (by email) the filing receipt you receive (see Point 6 below) to all contacts on the List of Parties.
- 5) Confirm the submission.
- 6) Once confirmed, you will receive two emails:
  - a filing receipt where you can verify your attachments; and
  - important instructions, including a reminder to serve your filing on all other parties (unless otherwise directed) and to provide the CER with the necessary hard copy(ies).

#### **4.2.3. What if a deadline cannot be met?**

Deadlines are set to provide fairness, efficiency, and certainty to all those involved. On a particular deadline, unless directed otherwise, the CER must receive documents **by 4:00 pm Mountain time**.

Late filings will **not** be accepted, except with the Commission's permission. If a party cannot meet a deadline, they must file a request to the Commission for an extension sufficiently in advance of the deadline. Any such request must include the reason why the deadline cannot be met, what value the filing will hold, the filer's views as to whether the other parties could be disadvantaged or prejudiced as a result of the late filing, and any other relevant information that the filer wants the Commission to consider. The Commission may seek comments on the request prior to deciding on it.

#### **4.3. Notices of Motion**

If a party wants to ask the Commission to do something, they must file a request (referred to as a "**notice of motion**"). For example, a notice of motion may be used to ask the Commission to consider a change to the hearing process or to ask the Commission to strike information from the hearing record.

Notices of motion must be filed as soon as possible, as late notices of motion may disrupt the hearing schedule. If a notice of motion is not filed on a timely basis, the Commission may decide that it will **not** consider it.

If a party is relying on case law or other legal authorities in support of their notice of motion, they must file a "Book of Authorities" and highlight the specific passages within the authorities that they are relying on. Please contact the Process Advisor if you have any questions on how to file a notice of motion.

#### **4.4. Confidential filings**

All filings will be available in the CER's online public registry, unless the filing has been granted confidential treatment under subsection 5.34 or 5.35 of the COGOA or is Indigenous knowledge that has been provided confidentially under section 58 of the CER Act.

Please see the "[Request for Confidentiality](#)" link on the CER's website if you plan to file a confidentiality request, as there are specific and important procedures to follow when filing the confidential information. Please contact the Process Advisor to discuss these steps.

In accordance with section 58 of the CER Act, the Commission will not disclose any Indigenous knowledge that is provided in confidence, unless it is otherwise publicly available, the disclosure is necessary for the purposes of procedural fairness and natural justice (or for use in legal proceedings), or the disclosure is otherwise authorized in regulations.

See the CER's website for more information on [confidential Indigenous knowledge](#).

THE COMMISSION OF THE CANADA ENERGY REGULATOR

*Signed by*

Ramona Sladic  
Secretary of the Commission

## **Appendix I – Draft List of Topics**

### **Application to vary Operations Authorization OA-1210-001**

On 12 December 2023 ([C27634](#)), the Commission issued a Draft List of Topics for consideration in the hearing to assess Imperial’s application to vary Operations Authorization OA-1210-001 (**OA**), to allow for the continuation of Imperial’s operations at the Norman Wells Operations (**OA Variance**). The Commission has revised the List of Topics, based on its initial review of the OA Variance application.

The Commission may also consider submissions about relevant topics that are not listed, including those that may be identified by parties to the hearing process.

The revised Draft List of Topics for the OA Variance application includes, but is not limited to:

1. The scope of the OA Variance, including any potential drilling activities (production, injection or observation wells) that may be required;
2. The effects of the OA Variance on the rights of Indigenous<sup>1</sup> Peoples recognized and affirmed by section 35 of the *Constitution Act, 1982*<sup>2</sup> including those set out in the Sahtu Dene and Metis Comprehensive Land Claim Agreement;
3. The interests and concerns of Indigenous Peoples, including with respect to their historic and current use of lands and resources; ~~for traditional purposes;~~
4. **The effects of the OA Variance on resource conservation for the Norman Wells field** [added];
5. **The effects of the OA Variance on navigation under the *Canadian Navigable Waters Act*** [added];
6. The continued health, social, and economic effects of the OA Variance;
7. The continued environmental effects of the OA Variance, including impacts on climate change, any cumulative environmental effects and;
  - o The application of the *Mackenzie Valley Resource Management Act* to the OA Variance;
8. The continued safety and security of persons and the protection of the environment during the OA Variance, including emergency response;
9. The contingency plans for spills, accidents, cyber-security incidents, or malfunctions during the OA Variance;

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<sup>1</sup> The use of the term “Indigenous” has the meaning assigned by the definition of “aboriginal peoples of Canada” in subsection 35(2) of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982* (UK), 1982, c 11, which states:

In this Act, “aboriginal peoples of Canada” includes the Indian, Inuit and Métis peoples of Canada.

<sup>2</sup> *Constitution Act, 1982*, being Schedule B to the *Canada Act* (1982) (UK), 1982, c11.

10. The continued economic feasibility of the Norman Wells Operations, including financial responsibility and liability for potential spills and debris; and
11. The proposed term of OA Variance, and its connection to ongoing and future pipeline and production facilities abandonment and reclamation plans.

## **Appendix II – Draft List of Topics**

### **Line 490 Replacement Activities Application**

The Commission has prepared this Draft List of Topics for consideration in the hearing to assess Imperial's application to replace five (5) lines between Goose and Bear Island within the Line 490 corridor of the Norman Wells Operations, using a horizontal directional drilling method (**Replacement Activities**).

The Commission may also consider submissions about relevant topics that are not listed, including those that may be identified by parties to the hearing process.

The Draft List of Topics for the Replacement Activities application includes, but is not limited to:

1. The scope of the Replacement Activities, including timing considerations (scheduling), seasonality, access and staging of equipment required;
2. The effects of the Replacement Activities on resource conservation for the Norman Wells field;
3. The effects of the Replacement Activities on navigation under the *Canadian Navigable Waters Act*;
4. The effects of the Replacement Activities on the rights of Indigenous Peoples<sup>1</sup> recognized and affirmed by section 35 of the *Constitution Act, 1982*<sup>2</sup> including those set out in the Sahtu Dene and Metis Comprehensive Land Claim Agreement;
5. The interests and concerns of Indigenous Peoples, including with respect to their historic and current use of lands and resources;
6. The appropriateness of the general route and land requirements for the Replacement Activities;
7. The suitability of the Horizontal Directional Drill design and the available information for the Replacement Activities;
8. The suitability of the decommissioning and/or abandonment plan for the existing Line 490 corridor, including whether the decommissioning is appropriately an interim step to eventual abandonment or whether it is the final step in the pipeline's life cycle;
9. The continued health, social, and economic effects of the Replacement Activities;

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<sup>1</sup> The use of the term "Indigenous" has the meaning assigned by the definition of "aboriginal peoples of Canada" in subsection 35(2) of the *Constitution Act, 1982*, being Schedule B to the *Canada Act 1982* (UK), 1982, c 11, which states:

In this Act, "aboriginal peoples of Canada" includes the Indian, Inuit and Métis peoples of Canada.

<sup>2</sup> *Constitution Act, 1982*, being Schedule B to the *Canada Act* (1982) (UK), 1982, c11.

10. The continued environmental effects of the Replacement Activities, including impacts on climate change, any cumulative environmental effects and;
  - The application of the *Mackenzie Valley Resource Management Act* to the Replacement Activities;
11. The continued safety and security of persons and the protection of the environment during the Replacement Activities, including emergency response;
12. The contingency plans for spills, accidents, or malfunctions during the Replacement Activities; and
13. The economic feasibility of the proposed Replacement Activities, including financial responsibility and liability for potential spills and debris.