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September 18, 2020

File: MV2018A0022 &
MV2018L1-0005

Terence Hughes, Regulatory & Community Affairs Representative
Paramount Resources Ltd.
Suite 2800 421 – 7th Avenue SW
Calgary, Alberta, Canada T2P 4K9

Sent Via Email:

Dear Terence Hughes:

**Closure and Reclamation Plan – June 30 2020 – Not Approved
Paramount Resources Ltd. – Well Site (H-78) Reclamation, Celibeta, NT**

The Mackenzie Valley Land and Water Board (MVLWB or the Board) met on September 17, 2020 and reviewed your Celibeta Closure and Reclamation Plan (dated June 30, 2020), which was submitted under Part H, condition 1 of Type B Water Licence MV2018L1-0005 and condition 68 of Class A Land Use Permit MV2018A0022.

At this time the Board is unable to approve the Celibeta Closure and Reclamation Plan (dated June 30, 2020) as submitted because the following information is absent from the document:

- 1) Rationale for undertaking closure and reclamation activities prior to submission and/or approval of the closure and reclamation plan;
- 2) Complete information pertaining to post-closure environmental monitoring planned for the site including frequency, parameters, etc. for surface water, ground water, soil, and project components;
- 3) Timeline for providing a revised/updated financial security estimate for the project;
- 4) Measure implemented/proposed to manage site/surface water;
- 5) Details regarding the eventual fate of the project site's access road including pertinent consultations and engagement;
- 6) Details regarding Site Specific Remediation Guidelines developed for the site in 2019 and the results of sampling conducted prior to these guidelines development and remediation and reclamation activities being completed;
- 7) Appropriately scaled, topographic map(s) or drawing(s) showing, relatively, the size, layout, and location of each project-related component including buried PHC soil, buried drill waste, wellhead, site water management structures, and any other relevant information;
- 8) Copies of Phases I, II, and III ESA results as appendices to the Plan;
- 9) Confirmation that Plan/design meets objectives in the *Guideline for the Design, Operation, Monitoring, Maintenance and Closure of Petroleum Hydrocarbon-Contaminated Soil Treatment Facilities in the Northwest* (2020);
- 10) Details pertaining to site-testing for contaminants of concern; and
- 11) Comprehensive information pertinent to revegetation plan for the site including measures proposed to address invasive species.

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The Board requires that Paramount Resources Limited submit a revised submission addressing the above-referenced items as well as relevant comments and/or commitments made during this review by October 9, 2020, for Board decision.

All related documents associated with this correspondence have been filed on the MVLWB's Public Registry through the following Links: [MV2018A0022](#) and [MV2018L1-0005](#).

If you have any questions or concerns, please contact Sean Joseph at (867) 766-7469 or by email to sjoseph@mvlwb.com.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Mavis Chi-Michaud".

Mavis Chi-Michaud
MVLWB Chair

Copied to: Distribution List