



June 11, 2019

Mavis Cli-Michaud  
Chair  
Mackenzie Valley Land and Water Board  
7<sup>th</sup> Floor – 4910 50<sup>th</sup> Avenue  
Yellowknife, NT  
X1A 2P6

Dear Ms. Cli-Michaud,

Re: **Northwest Territories Power Corporation (NTPC)  
Water Licence Renewal Application – MV2019L1-0001  
Power Generation at Jackfish Lake and Associated Activities  
Request for Intervention**

On February 26, 2019, the Northwest Territories Power Corporation (NTPC) applied for a Type “A” Water Licence Renewal (MV2019L1-0001) related to water use to provide cooling water for their facilities at Jackfish Lake. The Government of the Northwest Territories – Department of Environment and Natural Resources (ENR) provided initial comments on this application on April 2, 2019 and responses were provided by NTPC on April 15, 2019. A summary of our issues and concerns are outlined below.

#### Water Quantity

ENR and other parties requested confirmation on the amount of water requested by NTPC (50,000 m<sup>3</sup>/day). As well, there was some discussion during the May 2, 2019 technical session regarding some confusion about requested and historic water usage. As such, NTPC was issued an information request (IR#2) to clarify water usage. In response to IR#2, NTPC clarified there was an error in their response to ECCC #8 and that the values identified were gallons/minute as opposed to gallons/month.

During the technical session, NTPC clarified that 50,000 m<sup>3</sup>/day is maximum

operating capacity and that historic water usage is more in the range of 16,000 m<sup>3</sup>/day. The maximum has been requested in the event that it is required for power generation. Detailed water usage was also provided outlining that the average daily usage was approximately 18-23,000 m<sup>3</sup>/day.

ENR appreciates the clarification provided by NTPC and has no further concern regarding the requested water amounts. ENR notes that water used to support the Jackfish Lake facilities is circulated through the facilities for cooling waters and is returned to the lake.

### Sump Discharge

ENR requested clarification on the discharge location and other management techniques related to the treatment and disposal of sump water from within the plants. NTPC clarified at the technical session that sump water is pumped out through an oil/water separator into a vacuum truck and disposed of at the City of Yellowknife's sewage lagoon. During the technical session, an information request (IR#1) was issued to NTPC requesting that they provide additional information on the parameters that are analyzed in the sump water and provide clarification on the criteria that the water must meet before disposal into the City's facilities. In response to IR#1, NTPC noted that sump pump out occurs every 3-5 years and moving forward "NTPC will follow the Guideline for Industrial Waste Discharges in the NWT for testing the oil-water separator/sumps water before pumping out." ENR has no further concerns in this area.

### Aquatic Effects Monitoring Program (AEMP)

Within the draft water licence proposed by NTPC, there is reference to the development of an AEMP to monitor potential effects to the aquatic environment of Jackfish Lake which may result from the effluent discharge. As noted in our April 2, 2019 comments and reiterated during the technical session on May 2, 2019, the AEMP should be scoped appropriately given the scale of the undertaking. Additionally, ENR has also noted that we are available to work with NTPC and other parties on the development of this program, as appropriate.

Finally, and as discussed at the May 28, 2019 pre-hearing conference, it is ENR's position that this matter can be handled by means of a written proceeding and a public hearing is not required. However, should the Board decide to hold a hearing, ENR will be available to attend.

Should you have any questions or concerns, please do not hesitate to contact Rick Walbourne, A/Manager, Water Regulatory at (867) 767-9234 Ext: 53113 or email [rick.walbourne@gov.nt.ca](mailto:rick.walbourne@gov.nt.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Clancy', written in a cursive style.

Patrick Clancy  
Environmental Regulatory Analyst  
Environmental Assessment and Monitoring Section  
Environmental Stewardship and Climate Change Division  
Department of Environment and Natural Resources  
Government of the Northwest Territories