



7th Floor - 4922 48th Street,
P.O. Box 2130, Yellowknife NT X1A 2P6

Tel: 867-669-0506 Fax: 867-873-6610
www.mvlwb.com

November 18, 2020

File: MV2019L8-0008

Matthew Miller, Senior Environmental Licensing Specialist
Health, Safety & Environment
Northwest Territories Power Corporation
4 Capital Drive,
Hay River NT X0E 1G2

Sent by email

Dear Matthew Miller:

**Re: Northwest Territories Power Corporation –2019 Annual Water Licence Report - Acknowledgement
Taltson Winter Road – Water Licence MV2019L8-0008**

The Mackenzie Valley Land and Water Board (the Board) met on November 12, 2020 and reviewed the Northwest Territories Power Corporation (NTPC) 2019 Annual Water Licence Report (2019 Annual Report) for the Taltson Winter Road, submitted to fulfill Part B, Condition 14 of Water Licence MV2019L8-0008.

The Board hereby acknowledges the 2019 Annual Report as submitted. The Board directs NTPC to address all comments and recommendations provided in the attached table for all future Annual Report submissions under Licence MV2019L8-0008.

In addition, the Board directs NTPC to provide any updates to approved water source locations, including Inspector approval, to the Board so that up-to-date information can be maintained on the public registry.

The Board notes and appreciates NTPC's efforts to report in accordance with the requirements of Licences MV2019L8-0008. Please contact Shannon Allerston at 867-766-7465 with questions or comments about this letter.

Yours sincerely,

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

Mavis Cli-Michaud
MVLWB, Chair

Attachments: Table of Comments and recommendations

Copied to: Distribution List

Table 1: Comments and Recommendations

	Components of the Annual Report required by Part B, condition 14 of Licence MV2019L8-0008	Comments and Recommendation on the adequacy of the 2019 Annual Report
a)	A summary of Project activities during the previous year;	Inadequate. Appendix B provides updates to the Taltson winter road water source details, including updated coordinates and additional draw point locations. This information, including approval from the Inspector, should have been provided to the Board, and described in this section of the Report. Appendix C presents information related to changes in the winter road alignment. Such changes should be discussed in this section of the Report.
b)	A brief summary of Project activities for the upcoming year;	Adequate. However: Section 2.2 of the Report should refer to Appendix B - Water Source Ground Truthing Information (February 2020) – where additional information on proposed additional or alternative water sources is provided.
c)	An updated Project schedule;	Inadequate. Aside from a statement that says that the winter road is required for three to five seasons and is planned to begin construction earlier in 2020 (November or December vs. January), no other information the Project schedule is provided. More details on the upcoming Project schedule could be provided for both the upcoming year and for the Project duration.
d)	A summary of engagement activities conducted in accordance with the approved Engagement Plan;	Adequate.
e)	A summary of how Traditional Knowledge influenced decision making;	Section 2.6 addresses the gathering and influence of traditional knowledge. No comments or recommendations were received on the adequacy of this part of the Annual Report.
f)	A summary of Water use in accordance with Part C of the Licence;	Included. A Table is provided under Section 4 of the Water Licence Annual Report. The total water volumes reported are presented in liters while the maximums approved through the Operations and Maintenance Plan are presented in cubic meters. The total volumes used should be presented in a way that allows for a direct comparison with volumes presented and approved in the O&M Plan.
g)	A summary of Construction activities conducted;	Inadequate. NTPC has not included a summary of the construction activities in the Report.

	Components of the Annual Report required by Part B, condition 14 of Licence MV2019L8-0008	Comments and Recommendation on the adequacy of the 2019 Annual Report
h)	A summary of activities conducted in accordance with the Waste Management Plan;	Inadequate. More information on the waste management activities that were undertaken including the final disposal or storage locations of all waste managed should be provided.
i)	A summary of activities conducted in accordance with the Operations and Maintenance Plan, required in Part E of this Licence, including an analysis of monitoring results at the end of each season and a discussion of changes required to adaptively manage the project;	Inadequate. NTPC has not included any information in regard to monitoring and its analysis. The 2019 Annual Report does not provide any information or results of any environmental monitoring that is discussed in the Operations and Maintenance Plan.
j)	A summary of activities conducted in accordance with the approved Spill Contingency Plan, required in Part F of this Licence, including: i. A list and description for all Unauthorized Discharges, including the date, NWT spill number, volume, location, summary of the circumstances and follow-up actions taken, and status (i.e. open or closed), in accordance with the reporting requirements in Part H of this Licence; and ii. An outline of any spill training and communications exercises carried out;	Inadequate. NTPC has not included this information in its 2019 Annual Report. Whether spills or training activities took place or not, there should be a section of the report dedicated to addressing the requirements of the Licence so that it is clear whether or not actions have been taken to prepare for or in response to any unauthorized discharges. The Hagglund incident described in Appendix C should be discussed in this section of the report.
k)	A summary of activities conducted in accordance with the Closure and Reclamation Plan, required in Part G of this Licence, including: i. Details of any Remediation/Progressive Reclamation undertaken;	Adequate.
l)	A summary of actions taken to address concerns, non-conformances, or deficiencies in any reports filed by an Inspector;	Adequate.
m)	Any other details requested by the Board by February 1 of the year being reported.	N/A