

April 10, 2013

Angela Love
Regulatory Specialist
Sahtu Land and Water Board
Box 1, Fort Good Hope
Northwest Territories
X0E 0H0

Dear Ms. Love:

**Re: Husky Oil Operations Ltd.
Land Use Permit Application – S12X-006
Revised Surface and Groundwater Monitoring Plan
Request for Review and Comments**

The Department of Environment and Natural Resources (ENR) has reviewed the document at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act* and the *Wildlife Act* and provides the following comments and recommendations.

Topic: Revised Surface and Groundwater Monitoring Plan

Recommendation(s):

1. ENR understands that the SLWB will ensure that groundwater mapping and monitoring commitments of the proponent, and any related requirements determined to be necessary, are included as Terms/Conditions in the associated Water Licence(s) for such activities to ensure enforcement, inspection, compliance and follow-up mechanisms are in place and that proponent commitments in this regard are implemented.
2. ENR would like to emphasize that current project based surface and groundwater mapping and monitoring shall be integrated into other future gas and oil exploratory drilling projects, other gas and oil developments and regional efforts for baseline information gathering and assessment, in a coordinated and integrated manner.
3. The proponent has indicated to the Board that Surface and Groundwater Mapping has not been undertaken as they have drilled only one monitoring well, and that

dialogue with other proponents in the District/Region would be required to begin such an effort. ENR recommends that the proponent begin discussions with other proponents currently conducting gas/oil exploration activities, or planning on conducting such activities in the future, in order to be able to present a framework on how Regional Surface and Groundwater Mapping will be implemented in a coordinated and consistent manner across proponents and the region. A Regional Surface and Groundwater Mapping framework should a Board requirement and could be included in the next revision of the next Revised Surface and Groundwater Monitoring Plan.

4. ENR would like to emphasize the importance of all proponents involved in regional surface and groundwater monitoring and mapping using similar parameters and methods of data collection to ensure the data can be used in a scientifically sound and integrated manner in order to accurately measure environmental effects in a regional context.

ENR is aware and understands that the *Revised Surface and Groundwater Monitoring Plan* will be helpful in establishing reliable baseline information that could be incorporated into Regional Surface and Groundwater Mapping efforts that will be helpful in avoiding potential significant adverse effects to the environment from future gas and oil exploration and production.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at 920-6118 or patrick.clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring
Land and Water Division
Environment and Natural Resources
Government of the Northwest Territories