

Review Comment Table

Board:	SLWB
Review Item:	Norman Wells Operations 2018 Annual Flowline Integrity and Breakup Report (S13L1-007)
File(s):	S13L1-007
Proponent:	Imperial Oil Resources
Document(s):	2018 Flowline Integrity and Breakup Report (18.3 MB)
Item For Review Distributed On:	Nov 7 at 10:04 Distribution List
Reviewer Comments Due By:	Nov 22, 2018
Proponent Responses Due By:	Nov 29, 2018
Item Description:	<p>Imperial Oil Resources N.W.T. Ltd. (IORL) has submitted its Norman Wells Operations 2018 Annual Flowline Integrity and Mackenzie River Breakup Report in accordance with Part F, condition 6 of Licence S13L1-007. Although formal Board approval is not required under the Licence, the Board must be satisfied that the Licensee has met the requirements of the Licence.</p> <p>Reviewers are invited to submit any comments or recommendations by November 22, 2018.</p>
General Reviewer Information:	All documents that have been uploaded to this review are also available on our public registry. If you have any questions or comments about this review or the Online Review System, please contact Bonnie Bergsma at (867) 496-2778 or email bonnie.bergsma@slwb.com .
Contact Information:	Bonnie Bergsma

Comment Summary

GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<p>Comment (doc) ENR Letter - No Comments or Recommendations at this time</p> <p>Recommendation</p>		

Sahtu Renewable Resource Board: Colin Macdonald

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General Report	<p>Comment This report has been submitted by IOR in accordance with the conditions of the Water Licence to submit a Flowline Integrity Report. The survey assesses the status of the natural and artificial islands, the amount of scour and condition of flowlines transporting material from the islands to the mainland. IOR has committed to undertake necessary maintenance to preserve the integrity of the islands and the flowlines in the event that the survey reports significant scouring or changes in instream cover.</p> <p>Recommendation The report covers the areas identified in the Water Licence but provides very little detail on the conditions of the flowlines. The report should include a section on the methods used and how the condition of the lines is determined in relation to the conditions of the licence (e.g., changes in the volume of cover). Specific examples of required details are listed below.</p>	<p>Dec 10: Thank you for your comments. The report has remained largely untouched for the past 3 years. The intention of the report is to maintain a high level assessment on the lines given the broad audience who are recipients of the report. Specifics on methodologies have been discussed in the past and are generally standard with respect to assessing line conditions and depth of cover. This detail could be included to provide the SRRB a greater ability to assess the report should they be interested in the mechanics of how depth of cover surveys are completed.</p>	<p>The methodology for assessing the flowlines has been documented in the Board approved 2014 Flowline Integrity Plan. The annual reports provide details on annual inspections and maintenance work required.</p>
2	Section 5 2018 Bathymetric Survey	<p>Comment The survey was conducted to determine the amount of cover over the flowlines and to monitor the river bed. Pg 18 – “The primary intent of the bathymetric survey is to verify that flowline bundles</p>	<p>Dec 10: See comments above. The language used in this section is again intended to provide the broad audience of readers the understanding that results from the current year are showing similar</p>	<p>The methods are documented in the 2014 Flowline Integrity Plan.</p>

		<p>are not exposed (i.e. depth of cover remains > 0 m), such that the risks outlined above are reduced to the extent possible.” However, the descriptions of the surveys are not quantitative and do not appear to provide measurements on the full length of the submerged flowlines.</p> <p>Recommendation This section should include a brief summary of the methods used for the survey and its potential problems. Much of the language in this section sounds speculative. 2018 results are “very similar” or “generally similar” to 2017 or previous years.</p>	<p>result to that in the past. There was no significant change in depth of cover or integrity which was to be expected given the operation was shut down for the entirety of the previous reporting period.</p>	
3	Section 5	<p>Comment The results of the flowline surveys do not correspond to the licence conditions. The licence requirement is for Locations, depth, and volume of channel scour in the vicinity of any Flowline(s). The results of the surveys are given as “very similar to previous year’s surveys” and “generally similar to the previous year’s survey” (Sections 5.1.1.1 and 5.1.1.2). The general result of “adequate cover throughout the entire length” is reported in some cases even though sections of the flowline can’t be viewed. This does not leave the reviewer confident that conditions around the flowlines have been adequately evaluated.</p> <p>Recommendation The</p>	<p>Dec 10: Thank you again for your comments. The level of scour has largely not changed from previous years and as described above, the format and data delivered as part of this report has remained unchanged for the past 3 years with no comment from the Board; however, numerics can be added to help the SRRB conduct their own analysis if this will prove useful.</p>	<p>Agreed. It would be useful for the reports to include a schematic figure showing the baseline level and how the location, depth and volume of scour changes over time in the annual surveys.</p>

		<p>results of the survey should conform to the requirements of the Licence to the extent possible for location, depth and volume of scour. As reported, it isn't possible for reviewers to determine if the degree of scouring is changing or how much scouring is occurring. Volumes of scour are not given, nor are the depth of cover in the past and how it has changed from a baseline level or relative to previous years. As presented, the results don't conform to the requirements of the Water Licence.</p>		
4	Section 5.1.1.5	<p>Comment Another example in relation to the above comments: "Data was not able to be collected at the Station 0+357m monitoring location". "The flowline corridor has adequate cover throughout its entire length." Recommendation How is this conclusion possible if a section can't be surveyed and a section has reduced cover?</p>	<p>Dec 10: The statement should read – "the corridor has adequate cover through the entire length that was surveyed." This aligns with the following statement that 0+357 requires verification in 2019.</p>	Response acceptable.