



Sahtu Land and Water Board

Staff Report

Division: Land Program - Water Program	Report No. 1
Date Prepared: November 14, 2014	File No. S14A-006 / S14L1-004

Meeting Date: November 17, 2014

Subject: Type A Land Use Permit and Type B Water Licence Applications submitted by Suncor Energy Inc.

1. Purpose/Report Summary

To inform the Board about a Type "A" Land Use Permit (LUP) and Type "B" Water Licence (WL) application by Suncor Energy Inc. (Suncor) to complete maintenance activities on the Tweed Lake M-47 well within Significant Discovery Licence 024 (SDL024), located 13 kilometers (km) south of Colville Lake, K'asho Got'ine District, Sahtu Settlement Area, Northwest Territories (NT).

2. Background

2.1 Project Overview

Suncor has identified a need to complete maintenance and re-suspension activities on the Tweed Lake M-47 (M-47) well within SDL024. Suncor conducted the well inspection during September 2013 and reported the results to the National Energy Board (NEB). The inspection revealed pressure (10,700 kPa) on the production tubing side of the wellhead. The NEB responded back in October requesting Suncor to provide a remedial plan to provide proper suspension of the wellbore to comply with Section 56 of the Canada Oil and Gas Drilling and Production Regulations for suspended wells. In January 2014, Suncor received approval from the NEB to defer the remedial repair by end of Q1/2015.

M-47 well site is one of three Suncor's currently suspended wells in the Colville Lake area (Tweed Lake M-47, Tweed Lake M-67 and Bele O-35). M-47 well is located approximately 13 km south of the community of Colville Lake, NT, (at 66°56'47.11", 125°54'09.42"). The M-47 well was originally drilled and then suspended in 1985 by Petro-Canada, and it was accessed again in 2003 to perform tests to determine the hydrocarbon potential of the subsurface formations. Petro Canada was subsequently acquired by Suncor Energy Inc. in August 2009, and the SLWB was informed about this change.

Suncor proposes to access the M-47 well to undertake the following maintenance activities (the Program):

- Construction of 15 kilometre (km) winter-only access road from the Government of Northwest Territories (GNWT) winter road to the M-47 well site;
- Construction of the well pad; and
- Re-suspension of the Tweed Lake M-47 well.

Suncor requires a Type “A” Land Use Permit as their activities include the use of heavy equipment of a weight exceeding 10 tonnes other than on a road as outlined in Section 4 (a)(ii) of the *Mackenzie Valley Land Use Regulations*.

Access and Lease Construction

Suncor proposes to construct a winter-only access to the M-47 lease. The total length of the access is 15 km and it will be up to 8 m wide. Access will start at Government of Northwest Territories (GNWT) winter road and then follow existing cutlines for a distance of approximately 15 km. Approval has been granted for a small section of the winter access to be located within the extent of the airport boundaries. The winter access will use existing cutlines and push-outs.

Construction of the winter access road will not require clearing of brush regrowth. Small dozers and graders will be used to plow snow and freeze-in access. The access will be frozen down to provide a hard surface for the movement of heavy equipment.

The original lease dimensions at Tweed Lake M-47 were 150m x 150m. Construction of the lease will not involve clearing of brush. Small dozers and graders will be used to plow snow and freeze-in the lease area. The lease area will be watered and frozen down to provide a hard surface for the movement of heavy equipment.

Re-suspension of M-47 Well

Suncor proposes to complete re-suspension activities at M-47, including the following:

- Construction of winter-only access and well pad;
- Set-up service rig, slickline and test equipment;
- Recover G-Pack-off and tubing plugs from well;
- Displace tubing volume into reservoir with water/methanol;
- Run permanent bridge plug into tail pipe of packer above XN profile and complete positive and negative pressure test;
- Circulate out and recover suspended materials and disposal of at an approved facility;
- Pull and recover tubing string and capillary injection string;
- Wireline bridge plug to above packer and pressure test;
- Pour bail cement on top of bridge plug;
- Haul tubing and capillary string to an approved disposal facility; and
- Rig out and release equipment.

No camp will be set up, and all personnel (up to 20 employees) will be accommodated in Colville Lake.

Water Use

Suncor requires a Type “B” Water Licence as their activities include the use of 100 or more m³ per day and less than 300 m³ per day as outlined in Schedule D (1)(b) of the *Waters Regulations*.

Water will be required for access road and lease area construction and the re-suspension of the well. Approximately 15,000 m³ of water will be required for the Program.

Estimated water requirements for each of the Program activities are as follows:

Program Activity	Water Volume Required (m³)
Access (winter road) construction	13,800
Well pad construction	1,170
Re-suspension activities	30
Total	15,000

Water will be sourced from Colville Lake. The withdrawal point will be on the north end of the airport. Water truck intake hoses will be appropriately screened to prevent the uptake of fish.

The Colville Lake water source area is 391.96 km². Colville Lake does not freeze to the bottom, therefore the average depth of the lake is estimated to be greater than 1.5 m. A conservative estimate of the available water volume under ice, assuming a total lake depth of 2.0 m, is approximately 783,920,000 m³. According to DFO's Winter Water Withdrawal Protocol 10% of water under ice, or approximately 19,598,000 m³, is available for withdrawal during one ice covered season. Suncor is proposing to withdraw 15,000 m³ which is 0.08% of the total available water for withdrawal under this estimate of the available water volume.

Waste Management Plan

It is anticipated that minimal domestic waste will be generated during the Program. An enclosed garbage bin will be used on-site to contain any domestic waste accumulated during daily Program activities. Waste will be disposed of by local contractors at an approved landfill location. No sewage is anticipated to be disposed of from site and personnel will be accommodated within Colville Lake. Recovered down-hole waste will be contained and disposed of at an approved facility.

Suncor will ensure that transportation and disposal of waste will be completed by approved carriers and receivers that are registered with the provincial or territorial authorities and hold all applicable licences and permits. Approval from the accepting disposal facility will be obtained prior to disposal.

Suncor will ensure the safe handling and storage of all waste streams occurs during the site maintenance activities. Material Safety Data Sheets (MSDS) for all products used on-site will be kept on-site and accessible to all workers and will outline information on safe handling precautions and product specific information.

All hazardous waste transported off-site for recycling or disposal will be packaged and transported in accordance with the specification provided in the Northwest Territories Guideline for General Management of Hazardous Waste in the NT, the NT Transportation of Dangerous Goods Regulations, the International Air Transportation Association (IATA), the International Maritime Dangerous Goods (IMDG), and the Interprovincial Movement of

Hazardous Wastes Regulations to meet specific requirements for packaging and labelling dependent on the mode of transportation.

Only personnel or contractors trained, certified and competent in the above regulations for transport of hazardous waste can prepare the waste for transportation and can complete designated shipping documents.

Waste management reporting will be in accordance with record keeping and reporting requirements of the Government of NT, BC and Alberta, as well as any land use permit and water licence issued.

The general focus of waste management reporting will be to ensure that the generation, handling, treatment and disposal of all waste streams is completed properly and accounted for.

Fuel

Fuel will not be stored within the Program area. Any re-fueling on site will be supervised at all time and drip trays will be used to minimize potential for spills.

Consumable materials or supplies associated with the re-suspension operations brought to the Program area will be stored on the truck/trailer until use. A minimal amount of water/methanol mix (approximately 30 m³) and oil (25 m³) will be stored in tanks on the lease area for less than two weeks. It is anticipated that two 30 lbs propane tanks will be used on the Program for heating.

Emergency Response and Spill Contingency Planning

Spill response equipment and materials will be located onsite during program activities, including dedicated spill kits for fuel transfer vehicles. Parked equipment will be inspected during a daily walk-around to identify and manage signs of spills and leaks. Drip trays will be used to capture minor spills and drips while refueling equipment. The drip trays will be inspected for fluid levels and will be replaced or emptied as necessary.

Suncor is responsible for emergency response and spill response on areas where they operate. Personnel will be made aware of Suncor's Spill Contingency Plan and Emergency Response Plan. If a reportable spill occurs, it will be reported to the NT-UN-24-hour Spill Response Line. Spills regardless of volume, will be documented by Suncor.

Fire Safety

As per section 10 and 19 (1) of the Forest Protection Act, Suncor will adhere to Forest Fire Prevention and Suppression Guidelines for Industrial Activities. The fire risk of the Program is low as activities will be restricted to the winter months.

Suncor will liaise with the GNWT Environment and Natural Resources (ENR) to obtain current Fire Danger Ratings, expected weather, and to report observed wildfires, as required. In the event of a forest fire, the GNWT Forest Fire Management Division hotline will be contacted.

Wildlife Safety

The potential for bear encounters in the area is low to medium during the winter. Suncor however will provide education and information so that employees and contractors working on site will be made aware of the potential for bear and other wildlife encounters.

Suncor will employ an armed wildlife monitor to support workers, as outlined in Schedule C of the Access and Benefits Agreement with KGLC. The monitor will have a current firearm certificate and will be approved by Suncor to carry a firearm on Suncor' projects. Hunting, fishing or trapping will not be permitted by Program personnel and harassment of wildlife will be prohibited. Personnel will be instructed to not feed wildlife and domestic food scraps will be contained in bear proof containers and removed from site daily.

Remediation and Reclamation

The service rig operations at M-47 will create minimal disturbance of the ground surface on the existing lease. Minor ground repair and levelling may be required. On completion of Program activities, equipment will be demobilized from site and any remaining waste materials removed and disposed of at an approved facility. A site inspection will be undertaken during the summer following the completion of re-suspension activities.

2.2 Additional Information Requested by SLWB

On October 3, 2014, SLWB staff sent a letter to Suncor requesting additional information and clarification on some of the application components. Suncor responded back on October 8, 2014. Staff questions and corresponding response from Suncor are provided below:

Question	Response
Potential Program impacts on Barren-ground Caribou: The Program fails to list and address potential impacts and mitigation measures for Barren-ground caribou populations in the area. Designated as a culturally important wildlife species, the Barren-ground caribou are among the most abundant subspecies of caribou found in the region, including in the Program area. Barren-ground Caribou should be in the list of common mammals found within, or near, the Program area and should be a part of the cumulative effects assessment on wildlife Valued Components.	Suncor recognizes that the Program area falls within the barren-ground caribou population habitat area as outlined in the Sahtu Land Use Plan (SLUP) Map 3: Barren-Ground Caribou and Woodland Caribou Range. To satisfy the SLUP's Conformity Requirement #7, Fish and Wildlife, detailed information on the potential impacts, mitigation measures and potential cumulative effects of the Program on the barren-ground caribou population has been provided in Attachment 1.
Conformity to the Sahtu Land Use Plan (CR #7): Barren-ground Caribou is identified in the Sahtu Land Use Planning (SLUP) as especially important to communities and as sensitive to disturbance and noise, and all land use activities occurring in these areas during the specified times are required to	As identified in Conformity Requirement 7(c) of the SLUP, all land use activities occurring within rutting and wintering habitat times (October 8 – March 31) are required to address impacts to caribou and their habitat. Suncor has undertaken this assessment (refer to Attachment 1) and due to the short

<p>address impacts to caribou and their habitat. Please consult Map 3 of the SLUP on page 41 for information on rutting and wintering habitat for the Barren-ground Caribou range in the region.</p>	<p>duration of the program and use of existing disturbed areas, determined that the residual effects associated with the Program are considered to be low. Suncor has identified mitigation measures that will minimize potential impacts to barren-ground caribou (refer to Attachment 1).</p>
<p>Decommissioning of the winter access: Suncor is proposing to construct a 15-km-long and 8-m-wide winter-only access to M-47 well site along 18 km's of existing cut lines. What will happen to the road beyond the Program dates? Will the road be used in the future for a different purpose? If decommissioning of the access is not anticipated, please explain why it is not required. If otherwise, please provide a closure and reclamation plan for the decommissioning of the access. Please refer to Northern Land Use Guidelines - Access: Roads and Trails (AANDC, 2010) for specific requirements for winter roads closure and reclamation.</p>	<p>Closure and reclamation of the winter-only access to the M-47 well site will be undertaken following the completion of the re-suspension activities. Suncor has reviewed and incorporated the 2010 Aboriginal Affairs and Northern Development Canada Northern Land Use Guidelines – Access: Roads and Trails, into the closure and reclamation plan outlined in Attachment 2.</p>
<p>List of Fuel, Type, Size and Amount: The Program anticipates the use of 11 pieces of heavy equipment, including service rig, grader, dozer, water trucks, service and fuel trucks. Please provide information on fuel types and amount, and additional clarification on the capacity of the fuel truck, that all fuel will be taken from Colville Lake (i.e., no fuel will be stored on site) and how re-fueling on site will be handled from the truck to the equipment.</p>	<p>Fuel will not be stored within the Program Area. Suncor anticipates that large construction and service rig equipment will use diesel fuel, and smaller equipment, pick-ups and service vehicles will use gasoline or diesel fuel. Due to the short duration of the proposed Program, Suncor will purchase fuel from the Community of Colville Lake.</p> <p>Re-fueling onsite will be via a 3000 Litre (L) re-fueling vehicle, which will be supply fuel from the community of Colville Lake's fuel storage facilities. In addition, smaller service trucks equipped with tidy tanks (300 L to 400 L) may also be used to refuel equipment on-site.</p> <p>A minimal amount of water/methanol mix (approximately 30 m3) and oil approximately 25 m3) will be stored in tanks on the lease area for less than two weeks. It is anticipated that two 30 lbs propane tanks will be used on the Program for heating. Suncor resubmits the table with the fuel volumes to be stored on site throughout the Program.</p>

2.3 Process Requirements

Application Received: October 1, 2014

Additional Information Requested: October 3, 2014

Additional Information Received: October 8, 2014

Application Deemed Complete: October 10, 2014

Application Forwarded for Review: October 10, 2014

Number of Review Agencies: 23

Review Period End Date: October 31, 2014

A Type "A" Land Use Permit is required for the following activities: the use of a vehicle or machine exceeding 10 tonnes. The application fee for the amount of \$150.00 was received with the application.

An Industrial Type "B" Water Licence is required for the following: the use of 100 or more cubic metres of water per day. The application fee for the amount of \$30.00 and annual water use fee for the amount of \$150.00 was received with the application.

3. Comments

3.1 Permission of Land Owner

The proposed Program activity is located on a Sahtu Surface Lands, and Suncor holds Significant Discovery Licence for the parcel 024. Access into the M-47 well site was required for completion operations in 2004 and a temporary Access and Benefits Agreement was developed with the K'asho Got'ine Land Corporation (KGLC) at this time. In order to sustain access to the three well sites, a longer-term Access and Benefits Agreement was signed between Petro-Canada, KGLC, Ayoni Keh Land Corporation (AKLC), Fort Good Hope Metis National Local #54 Land Corporation (MLC) and Yamoga Land Corporation (YLC), effective January 9, 2008. The term of the agreements are consistent with the term of the underlying Significant Discovery Licences and any extensions thereto. Petro-Canada was subsequently acquired by Suncor Energy Inc. in August 2009.

3.2 Community Consultation

Suncor held community consultation in Colville Lake, NT on June 25, 2014, to discuss the Program. Prior to travelling to Colville Lake for community consultation meetings, Suncor distributed fliers to the Colville Lake community informing people of the upcoming community meeting and providing an overview of the proposed Program and what would be discussed during the upcoming meeting.

Suncor contacted and/or met with representatives from:

- Ayoni Keh Land Corporation;
- Behdzi Ahda First Nation; and
- Community of Colville Lake.

Presenters first provided background information on Suncor as most attendees had been more familiar with Petro-Canada as the previous owner of the M-47 well. This meeting provided the opportunity to introduce key program team members, continue building relationships, present an overview of proposed program components, hear about local concerns and interests and seek local Traditional Knowledge.

The Behdzi Ahda First Nation Council provided Suncor with a letter of support for the Program dated September 15, 2014.

3.3 Traditional Environmental Knowledge and Traditional Land Use

Traditional Environmental Knowledge (TEK) and Traditional Land Use (TLU) study was initially undertaken in relation to LUP S03A-010 and WL S03L1-020 in December 2003 and subsequent application in 2004 (PNR-04-001). Following discussions which took place between Suncor and the Ayni Keh Land Corporation (AKLC) in May 2014, it was determined that the TEK and TLU study should be updated prior to submitting further applications to the SLWB.

Suncor conducted further TEK and TLU study during the community consultation completed on June 25 and 26, 2014. Elders and community members have requested that TEK/TLU information collected during the 2014 consultation not be made public and remain confidential.

The TEK and TLU information assisted Suncor in planning the Project to have the least amount of impact on the land and the people that use the area. The information was used during Project design in the following ways:

- Suncor will notify the communities of Colville Lake and Fort Good Hope prior to commencing operations. Providing notification will aim to prevent Suncor's winter access from conflicting with trap lines and travel on the land;
- Suncor will only withdraw water for the proposed Project activities from Colville Lake to avoid conflicts with other water sources that were identified as being significant during the community consultation;
- Proposed Project activities will avoid conflict with cabins and burial sites;
- Project personnel will be prohibited from hunting, fishing, and trapping; and
- Suncor will ensure that speed limits are posted on access roads and wildlife will be given the right-of-way.

3.4 Potential Environmental Impacts and Mitigation Measures

See the Preliminary Environmental Screening for potential environmental impacts and proposed mitigation measures.

3.5 Preliminary Environmental Screening

Section 124(1) of the *Mackenzie Valley Resource Management Act* requires the Sahtu Land & Water Board to undertake a Preliminary Screening of any proposed development prior to the issuance of a Licence, Permit, or Authorization.

Based on the information provided in the application and by review agencies (see Section 4), a Preliminary Environmental Screening (PES) was performed. The report concludes that the effects of the Program on the environment can take place in an environmentally responsible manner provided that mitigation measures outlined in the Program's Environmental Protection Plan are followed. The Draft PES Report and a Draft Staff Report were forwarded to the Mackenzie Valley Environmental Impact Review Board (MVEIRB) four days prior to the Board Meeting. If the Draft PES is approved by the Board, it will be forwarded to MVEIRB as an approved copy.

3.6 Draft Permit and Licence

A Draft Permit and Licence with Terms and Conditions have been completed and are located within the Board Package

3.7 Security Deposit

Section 32 of the *Mackenzie Valley Land Use Regulations* and Section 12 of the *NWT Waters Regulations* provides that the Board may require a security deposit in an amount not exceeding the aggregate of;

- a) abandonment of the land use operation,
- b) restoration of the site of the land use operation,
- c) any measures that may be necessary after abandonment of the land use operation.

In setting the amount of security, the Board may consider;

- a) the ability of the applicant or prospective assignee to pay the costs,
- b) the past performance of the applicant or prospective assignee,
- c) the prior posting of security by the applicant pursuant to other federal legislation in relation to the land use operation,
- d) the probability of environmental damage or significance of any environmental damage.

Posted security shall be in the form of;

- a) a promissory note or letter of credit,
- b) a certified cheque,
- c) bearer bonds or performance bond,
- d) cash,
- e) such other form as the Minister may indicate to be satisfactory.

For Land Use Permit, a security deposit value of \$24,145.31 was calculated using the Land Use Permit Security Worksheet. For Water Licence, a value of \$43,734.00 was calculated using the RECLAIM model.

It is at the Board's discretion on how much security to take.

4. Other Agency Comments

The application was circulated to 23 organizations requesting a reply by October 31, 2014. To date 5 written responses have been received. The following organizations offered comments on the application:

- Environment Canada
- Department of Fisheries and Oceans Canada
- GNWT – Department of Transportation
- GNWT – Environment and Natural Resources
- GNWT – Industry, Tourism & Investment – Office of the Regulator of Oil and Gas Operations

All review comments were emailed to the proponent for their information and follow-up action as required. Responses from Suncor are also attached.

4.1 Discussion

A brief summary of comments are provided below. This section does not summarize all comments. Please review the attachments for complete comments.

Environment Canada

In a letter dated October 31, 2014, Environment Canada (EC) stated that it has reviewed the application and it will not be submitting any comments at this time.

Department of Fisheries and Oceans Canada

In a letter dated October 31, 2014, Department of Fisheries and Oceans Canada's (DFO) – Fisheries Protection Program stated that they conducted a preliminary assessment of Suncor application as it relates to DFO's mandate. Comments and associated recommendations from DFO and responses from Suncor are outlined in the following table:

No.	Comments/Recommendations	Response
1	Where the construction of temporary crossings over ice covered water bodies is required, the proponent should conduct the activities as specified in DFO's Northwest Territories protocol on Ice Bridges and Snow Fills.	Suncor does not anticipate requiring an ice bridge or snow fill, however it will comply with the guidelines, if necessary.
2	The removal of water under ice covered water bodies can impact fish through oxygen depletion, loss of overwintering habitat and/or reductions in littoral habitat. DFO recommends that the proponent adhere to the DFO Protocol for Winter Water Withdrawal from Ice-Covered Waterbodies in the Northwest Territories and Nunavut to avoid such impacts.	For the duration of the program, Suncor will withdraw 15,000 m ³ which is much less than 10% of the available under ice volume.
3	DFO recommends that the proponent adhere to the recently finalized Fish Screen Design Criteria for Flood and Water Truck Pumps, where appropriate.	Suncor will adhere to the Fish Screen Design Criteria for Flood and Water Truck Pumps (DFO, 2011) and the Freshwater Intake End-of-Pipe Fish Screen Guidelines (DFO, 1995).

GNWT – Department of Transportation

In a letter dated October 31, 2014, GNWT – Department of Transportation stated that they have no comments or concerns regarding the noted application.

GNWT - Environment and Natural Resources

In a letter dated October 31, 2014, the Department of Environment and Natural Resources (ENR) stated that it has reviewed the Suncor application based on its mandated

responsibilities under the Environmental Protection Act, the Forest Management Act, the Forest Protection Act, Waters Act and the Wildlife Act. The following table summarizes ENR's the comments and recommendations and provides corresponding responses from Suncor:

No.	Comments/Recommendations	Response
1	A detailed drawing of the transfer site needs to be provided detailing the layout of the secondary containment of the well pad.	Suncor has drafted a site sketch. A certified fuel delivery truck will deliver fuel from the nearest commercial fuel depot and transfer the fuel directly into the Service Rig and supporting equipment built-in fuel tanks on-site. The equipment onsite is stationary and spread out across the well site pad, as such monitoring, drip trays and absorbent pads will be used to ensure no fuel is spilt and/or hits the ground during the transfer operation.
2	The water/methanol mix exceeds maximum amount listed in Schedule "A" of the Spill Contingency Planning and Reporting Regulations R-069-93. It is recommended due to the secluded area, and the need for assistance in case of a spill, that the tanks are double walled and meets the requirement for secondary containment that can capture and contain 110% of the stored amount on the well site.	The methanol will be hauled to the site in totes and then transferred from the totes directly into doubled walled storage tanks onsite using transfer pumps c/w drip trays and absorbent pads. Suncor has updated the handling and storage methods for the methanol in Table 4 of the Waste Management Plan (WMP).
3	The proponent shall maintain a water log for the withdrawal of water during entire project and submitted to the Board for their records at the conclusion of the each year.	Suncor will record water withdrawal rates to ensure water withdrawal volumes do not exceed the licenced amount. Suncor will only withdraw water from one water source, Colville Lake, as discussed with the community of Colville Lake and applied for in the Water Licence application. The water log will be made available to regulatory agencies and the public upon request.
4	A description of the methods that will be used to segregate domestic and hazardous waste is required. A list should be provided that will detail what is being removed from the well site, including the locations of where the wastes/hazardous wastes are being disposed.	Suncor anticipates waste reporting in the Annual Report will be a condition of the Water Licence, which will become publically available information. Suncor is not proposing to dispose of wastes to Colville Lake's landfill.

No.	Comments/Recommendations	Response
5	If the proponent wishes to utilize community Solid Waste Disposal Facilities to deposit domestic or camp related wastes a letter from the community approving such deposits must be submitted to the Board.	Two Sahtu communities, Fort Good Hope and Norman Wells, were identified as potential waste management facilities because they hold an active Water Licence with the SLWB and are the closest communities to Colville Lake. Approval from the accepting disposal facility will be obtained prior to disposal. If the Sahtu communities are unable to accept non-hazardous, domestic waste, Suncor will remove all waste out of the Northwest Territories to Tervita's disposal facility in Rainbow Lake, AB.
6	Community municipal waste disposal sites are not designed, engineered or permitted or licenced to accept industrial or hazardous wastes generated outside of their municipal boundaries. If industrial wastes generated outside of a municipal boundary were to be deposited to a municipal landfill, it would have to be shown that the site has been designed, engineered and licenced or permitted to accept industrial wastes generated outside of a communities municipal boundaries and the Board would have to approve such deposits.	Suncor is not proposing to dispose of industrial or hazardous wastes generated during the Program to Sahtu community municipal waste disposal facilities.
7	Due to the increased access for hunting and trapping along the road, it is recommended that Suncor utilize a check point along that road to control and ensure safe access to the areas being utilized.	Suncor will install signage at the start of the access road warning unauthorized traffic to avoid the area due to industrial activity ongoing. Daily road patrols will be completed by the local Wildlife Monitor and the Suncor representative on the location. Unauthorized traffic will be stopped and warned of the industrial activity and timelines associated with it.
8	The access road should be blocked after yearly winter project activities are completed to minimize access when project activities are not taking place.	This is an existing access road/trail that, to Suncor's knowledge, has not been blocked for access prior to this operation. Suncor cannot legally block the use of lands within the Sahtu Settlement Area. The community members of Colville Lake may choose to maintain the access for snowmobile use. Suncor is not proposing to access the Tweed Lake M-47 wellsite in subsequent winters, therefore the vegetation will be allowed to re-establish

No.	Comments/Recommendations	Response
		which may naturally reduce access.
9	The winter road system throughout the Sahtu can be very treacherous. During the 2013/2014 winter season, there had been accidents and spills. All spills, or potential spills shall be reported to the Spill Report Line as soon as possible.	Suncor has updated the SCP to include the Government of the Northwest Territories Departments ENR and DOT.
10	In the case of a major oil spill, some of the fuel released at the site may be disposed of through in-situ burning. Precautions must be taken to ensure fire cannot burn back to fuel storage tanks. Refer to the "Used Waste Oil and Waste Management Regulations" and "Guideline for General Management of Hazardous Waste in the NWT."	Suncor has reviewed these regulations, updated the Recovery and Clean-Up section and will undertake operations in accordance with these regulations, if necessary.

GNWT – Industry, Tourism & Investment – Office of the Regulator of Oil and Gas Operations

In a letter dated October 30, 2014, the Office of the Regulator of Oil and Gas Operations (OROGO) stated that they have no specific comments on Suncor’s submissions and no conditions for attachment to the Sahtu Land and Water Board Land Use Permit and Water Licence.

5. Conclusion

The Preliminary Environmental Screening Report did not identify any significant adverse environmental impacts or public concerns. The effects of the Program on the environment can take place in an environmentally responsible manner provided that mitigation measures outlined in the Program’s Environmental Protection Plan are followed. These concerns have been addressed in the Terms and Conditions of the Land Use Permit and Water Licence.

A Draft Preliminary Environmental Screening Report and Draft Staff Report have been provided to the MVEIRB for review.

6. Recommendation

It is recommended that the SLWB proceed with the regulatory process and implementation by issuing the Land Use Permit and Water Licence with Terms and Conditions, provided there are no objections by MVEIRB.

Respectfully submitted,



Bakhtiyor Mukhammadiev
Regulatory Specialist

I agree with the recommendation and the conclusion found within this staff report.

Paul Dixon



Executive Director

Reference Material Attached

1. Suncor Cover Letter – Response to Review Comments
2. Review Comments Letter from Environment Canada
3. Review Comments Letter from Department of Fisheries and Oceans Canada
4. Response from Suncor to Department of Fisheries and Oceans Canada
5. Review Comments Letter from GNWT Department of Transportation
6. Review comments from GNWT Environment and Natural Resources
7. Response from Suncor to GNWT Environment and Natural Resources
8. Review Comments Letter from GNWT – Industry, Tourism & Investment – Office of the Regulator of Oil and Gas Operations