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January 25, 2018 **E-FILE**

Sahtu Land and Water Board
Box 1,
Fort Good Hope, NT X0E 0H0

Attention: Sabrina Sturman

Dear Ms. Sturman:

Re: Enbridge Pipelines NW Inc. ("Enbridge")
Line 21 Maintenance Saline River Project ("Project")
Application for Type A Land Use Permit S17P-005
Application for Type B Water License S17L1-004
Enbridge Response to Reviewer Comments
Comments on Draft Conditions

Enbridge Response to Reviewer Comments

Please refer to Attachment 1, providing Enbridge's responses to reviewer comments received on the Application for Type A Land Use Permit S17P-005 and Application for Type B Water License S17L1-004 ("Applications").

Many reviewer comments were directed towards increasing understanding of water and stockpiled materials management during Project activities. For clarity, Attachment 2 is a summary of planned isolation activities, as well as strategies to be executed for onsite management of water and excavated materials (re: ENR comments ID 1, 2, 3, 4, 6, 9; SLWB comment ID 1).

Comments on Draft Conditions

Enbridge has reviewed the draft conditions for both the land use permit and water license and has the following comments:

Land Use Permit

Draft Condition 47 - Enbridge disagrees with this proposed condition. It is Enbridge's policy to have agreements in place prior to utilizing any waste disposal facilities. Condition 48 appropriately requires Enbridge to demonstrate to the Board and Inspector that a facility has agreed to accept the Waste and has represented to Enbridge that they have capacity to receive the types and volumes of Waste requested. The question of compliance with any Water License issued to a waste disposal facility by the Sahtu Land and Water Board ("SLWB") is a matter for the SLWB, the Inspector, and the facility operator to consider. That being said, Enbridge is investigating alternatives to be prepared in the event that local facilities are unable to accept requested wastes.

Water License

Part A Item 1 ii), and Part D Item 1 – Depending on site conditions and access, withdrawal of water may occur from either the Saline River or the Mackenzie River.

Part B Item 6, Item 7, Item 8, Item 11 g), – Enbridge disagrees with these proposed conditions. Please see attached summary of planned water and soil management associated with the Project. There is no need for a compliance sampling point, and therefore an SNP, given the scope of the Project.

Part E Item 6 – Enbridge disagrees with this condition and requests that conditions in the land use permit and water license for the Project be aligned; see also Enbridge's comments on draft land use permit condition 47. As per draft condition 48 of the land use permit, Enbridge commits to providing the Board and Inspector with written notification that a facility has agreed to accept any camp waste and has the ability to accept the volumes of waste requested.

Part E – Effluent Quality Criteria – Items 7, 8, and 9 - Enbridge disagrees with these proposed conditions. Please see attached summary of planned water and soil management associated with the Project. Enbridge submits that, considering the scope of activities contemplated for this Project and the nature of planned onsite water discharge, there is no need to sample prior to discharge under normal operations and it would not be Enbridge's standard practice to do so. Enbridge commits to locating all discharge areas to the satisfaction of an Inspector. There is no landfarm associated with the Project.

Part F – Conditions Applying to Construction – Items 2, 3, 4, 5, 6, 7, 8 – Enbridge disagrees with these proposed conditions as they are not applicable to the Project. There are no "Engineered Structures" being contemplated by the Project as defined by the draft Water License. Also, as previously indicated, there is no landfarm.

Part G – Conditions applying to Modifications –Enbridge requests that this section be reconsidered as there is no landfarm and no Engineered Structures, either temporary or permanent, being contemplated. See also previous comments on Part F.

Annex A – Surveillance Network Program – Enbridge disagrees with the inclusion of an SNP for the Project as it is unnecessary given the scope of work, existing procedures, and the low likelihood of contamination. Further, if the Project were required to obtain laboratory sample results and regulatory approval prior to dewatering onsite, the Project could not be completed within the available window for construction. See previous comments and attached summary of planned water and soil management associated with the Project.

Should the Board require any further information, please contact the undersigned.

Sincerely,

Sarah McKenzie
Manager, Regulatory Affairs

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
Fisheries and Oceans Canada: Triage Group Fisheries Protection Program			
1.	**Water Licence**	**Comment(s):** In order to assess impacts to fish and fish habitat, Fisheries and Oceans Canada requests the following information: - Define the footprint below the high water mark required for the excavation at KP 180.168 and KP 180.28 - In the event that the Saline River is not frozen during the time of excavation and Isolation Option #2 is utilized, clarify the length of time that the isolation would be in place **Recommendation(s):** **DFO recommends that the requested information be provided in order to determine the potential impacts to fish and fish habitat.**	The footprint below the high water mark required for the excavation at KP 180.168 will be approximately 4 by 4 meters and 5 meters deep. The size of the excavation will be minimized to the extent possible while ensuring safety, to avoid channels as much as possible and reduce the volume of excavated soil. The excavation at KP 180.28 is not expected to be within the high water mark. If Option #2 is utilized, Enbridge anticipates approximately 25 days of isolation.
GNWT - ENR: Central Email GNWT			
1.		**Comment(s):** Enbridge has noted that one integrity dig will be located within the high water mark of the Saline River. While this area is expected to be frozen to the bottom or dry (Option 1), Enbridge has outlined other options that could be implemented should water be encountered. There are various references to Appendix V (Project Diagrams) to provide additional information for those options; however, this is a fairly coarse schematic that does include any specifics on water management options. Option 2 will be implemented should moderate flow be encountered and will involve pumping of water around the project area. Options to isolate the stream, or how it will be installed, aren't clear. Additionally, there may be standing water within the isolation areas that will also need to be managed. Also, it isn't clear whether aquatic organisms, which may be present within isolation areas, may require salvage. Finally, there is limited information regarding the discharge location for this water. Option 3 assumes higher flow and will involve temporary diversion to an adjacent river channel. Again, minimal information has been provided regarding this option. Information is required for isolation techniques, details outlining an assessment of the adjacent channel to ensure it can	Please refer to Attachment 2.

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
		accommodate increases in flows. **Recommendation(s):** **1. ENR recommends that additional information be provided for water diversion options including:** • **Isolation techniques for watercourses;** • **Assessment for aquatic organisms in ponded water and how they will be managed;** • **Water management for standing water (e.g. discharge locations);** • **Location of discharge of diverted water and mitigations to ensure that erosion does not occur; and** • **Assessment of adjacent channel to ensure flows can be accommodated (Option 3).**	
2.	**Groundwater Management**	**Comment(s):** Section 2.2 notes that groundwater infiltration is anticipated within the isolated area which will require dewatering. It isn't clear how this water will be managed to ensure that water with high TSS is not discharged into the downstream. While Enbridge does note an "approved discharge location", specifics were not included. **Recommendation(s):** **ENR recommends that Enbridge provide additional information outlining how groundwater infiltration will be managed. ENR notes that this water should ideally be discharged to land in such a way that erosion and sedimentation is prevented. This may be similar to mitigations for ponded water during project area isolation as mentioned above.**	Pease refer to Attachment 2.
3.	**Stockpiled Materials**	**Comment(s):** Section 2.2 of the Project Description notes that stockpiled excavated materials will be stored in "approved locations"; however, it isn't clear to what this refers. Additional information should also be provided detailing how this material will be stored and managed to ensure the prevention of erosion. **Recommendation(s):** **ENR recommends that Enbridge provide additional information on the**	Pease refer to Attachment 2.

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
		storage and management of stockpiled excavated materials.	
4.	**Backfilling of Stockpiled Materials**	**Comment(s):** Section 2.2 of the Project Description also noted that excavated areas will be backfilled with stockpiled material. It isn't clear if Enbridge has assessed the potential for this material to re-mobilize once water re-enters the isolated area. While ENR understands that the same material will be returned to the stream bed, the excavation process may change the size of this material and make it more susceptible to entry into the stream. **Recommendation(s):** **ENR recommends that additional information be provided on the potential for re-mobilization of excavated material once it is returned to the project area.**	Pease refer to Attachment 2.
5.	**Crossings**	**Comment(s):** A short existing access road from the winter road to the right-of-way will be utilized and then travel will occur along the right-of-way. It isn't clear if any crossings will be required. It does note in Table 3 that culverts will be installed "at watercourse crossings where applicable to facilitate fish passage. Consult with the EI to determine if and where culverts will be required." Additional information is required regarding the information and process that will be used to make these decisions regarding culvert installation. **Recommendation(s):** **ENR recommends that additional information be provided regarding watercourses that may be crossed as a part of access to the pipeline and how final decisions will be made regarding the necessity of culverts.**	There are no watercourse crossings identified on the existing access road or right-of-way access that will be utilized during the Project, therefore no culverts for crossings are anticipated to be required.
6.	**Surveillance Network Problem (SNP)**	**Comment(s):** Within the draft Water Licence, the SLWB has requested reviewer input on the SNP. As noted by the comments above, ENR has various questions on water management and how water may be discharged or diverted from the isolated area. It is difficult to determine where monitoring locations should be required until these items are clarified.	Pease refer to Attachment 2. Given the nature of dewatering activities associated with the Project, no SNP stations are required.

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
		Recommendation(s): **ENR recommends that the SLWB develop monitoring SNP stations based on responses from Enbridge regarding where water discharge to the environment may occur.**	
7.	**Water Licence – Security Comment(s)**	**Comment(s):** The Board has requested for input on Conditions Applying to Security Requirements. **Recommendation(s):** **ENR recommends that the amount of $10,000.00 be held as a security requirement for monitoring of post-closure activities under the Water Licence.**	Enbridge has no issue with this recommendation.
8.	**Landfarm**	**Comment(s):** The draft Water Licence references the existence of a landfarm. ENR is unaware of the existence of a landfarm in the application. **Recommendation(s):** **ENR requests clarification on references to a landfarm within the draft Water Licence.**	The reference to a landfarm is an error; there is no existing or planned landfarm, nor was a landfarm ever contemplated by Enbridge for the Project.
9.	**Dewatering**	**Comment(s):** Within the draft Water Licence, the SLWB has requested reviewer input on the Dewatering Section. As noted by the comments above, ENR has various questions on water management and how water may be discharged or diverted from the isolated area. It is difficult to determine where monitoring locations should be required until these items are clarified. **Recommendation(s):** **ENR recommends that the SLWB develop the Dewatering Section based on responses from Enbridge regarding how water discharge to the environment may occur.**	Pease refer to Attachment 2.

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
Sahtu Renewable Resource Board: Colin Macdonald			
1.	**S17L1-004, S17P-005**	**Comment:** The applications are fairly complete and it is unlikely that major impacts will result if the project proceeds as described. **Recommendation:** **It is critical that the final details of the project are reviewed by an Inspector prior to the onset of the project.**	Draft Land Use Permit Condition 8 requires notification to the Inspector prior to the commencement of Project activities.
2.	**Appendix I – Project Description**	**Comment:** The Proponent does not state what work will be conducted on the pipeline as part of the project. The description of activity before and after the work is repeated in a number of ways, but the actual work isn't described. Is the pipeline to be repaired, inspected, replaced? If so, what are the possible effects to the surrounding environment? **Recommendation:** **The proponent should include a description of the work activity so that reviewers can assess the potential for environmental impacts.**	The scope of this Land Use Permit is limited to off-right-of-way land use. A maintenance dig is routine work that is regulated by the National Energy Board and is subject to standard operating procedures. The purpose of the Project is to expose the pipeline for visual inspection and testing to confirm whether maintenance is required. Enbridge anticipates that sleeves may be installed over the existing pipeline at these dig locations.
3.	**Appendix I – Project Description**	**Comment:** The proponent doesn't state how long the project is expected to last and whether the project can be completed within the stated time frame. **Recommendation:** **Given that the permits have not been issued in January 2018, the final date of the project will need to be adjusted.**	The Project is forecasted to be complete mid-March 2018 with, pending regulatory approval, an anticipated start date of February 1st starting with camp construction. The winter construction season is expected to last through March.
4.	**Pg 15**	**Comment:** The proponent is going to conduct an Archeological Overview Assessment prior to the project commencing. Are the results of that assessment going to be available before plans for the project are finalised? Also, a traditional knowledge project was conducted through the Tulita RRC. Are the results of that project going to be considered in the final plans?	An Archeological Overview Assessment has been completed and was submitted to the Prince of Wales for review. Please refer to Attachment 1.1, for confirmation from the Prince of Wales that no further archeological assessment is required. The Traditional Knowledge Study conducted

ID	TOPIC	REVIEWER COMMENTS/RECOMMENDATION	ENBRIDGE RESPONSE
		Recommendation: **The Archeological and Traditional Knowledge projects should be acknowledged and the results considered in the planning of the project.**	through the Tulita RRC was not completed at the time of application. Enbridge has been, and will continue to, work collaboratively with the Tulita RRC to ensure that the results are appropriately considered in Project planning.
SLWB: Sabrina Sturman			
1.	**Appendix I, Table 5: Mitigation Measures for Water Management**	**Comment:** Appendix I, Table 5 indicates that Water withdrawn during excavations will be held in storage tanks or temporary holding cells and that Water to be discharged to the environment shall be directed to sediment removal basins, located in areas within the temporary workspace, however these details are not included in the Description of the Undertaking (Application form section 4.0) or the Sediment and Erosion Control Plan. **Recommendation:** **Board staff recommend additional detail be provided to clarify water management practices which also consider analytical testing to monitor potential contamination introduced during planned activities.**	Pease refer to Attachment 2.

December 15, 2017

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Re. Archaeological Overview Assessment (AOA) of Enbridge Pipelines Inc. Line 21 Maintenance Digs at the Saline River Crossing.

Dear Brent,

Thank-you for submitting the Saline River Crossing AOA Report to the PWNHC for review. We have reviewed the report and concur with management recommendations that no further archaeological work is required for Enbridge Pipelines Inc.'s proposed Maintenance Digs at the Saline River Crossing.

Sincerely,

Naomi Smethurst
Assessment Archaeologist
Prince of Wales Northern Heritage Centre
867-767-9347 Ext. 71255
naomi_smethurst@gov.nt.ca

Cc. Peter Cushman, Enbridge Pipelines Inc.

Enbridge Response to ENR comments ID 1, 2, 3, 4, 6, 9; SLWB comment ID 1

Isolation techniques for watercourses and onsite Water Management

The Saline River flows approximately from the northeast to the southwest in the project location. While the overall bankful width was measured at approximately 160 m, the active channel represents a much smaller width, measured at approximately 15 m (wetted channel width) at the time of the August 15, 2017 environmental screening. Immediately upstream of the Enbridge right-of-way, the single active channel splits into two active sub-channels, with a total of four sub-channels (two channels were dry at the time of the screening) within the proposed project area. These channels then converge into a single channel again at the downstream end of the proposed temporary work space.

Isolation Option 1 assumes that the Saline River will be dry or frozen to the bottom in the project location during the maintenance digs. Therefore no isolation from flowing water would be required.

Isolation Option 2 assumes moderate flow, which will be pumped from upstream of the isolated excavation area to downstream of the excavation area. Isolation of the work area will be completed using standard meter bulk bags that are filled with substrate material from the excavation, or sand material brought into the project area. A clean water diversion sump would be placed at the upstream end, and clean water would then be discharged into the active channel downstream of the isolated area to maintain downstream flow to the same capacity of upstream flow.

Isolation Option 3 assumes higher flow, which will involve a temporary diversion of all upstream flow into the one or two active channels, diverting the water away from the proposed excavation location within the high water mark. This diversion would be completed with meter bags, snow berms, or a temporary aquadam placed at the upstream end to divert flow to the north and south channels in the project area. The selected method of diversion will be confirmed once site conditions are assessed prior to beginning diversion activities. The bags would be filled with existing substrate material from the excavation or sand material brought into the project area. A diversion sump would be installed behind these bags and pumped to the active channel where the flow was diverted if required due to small levels of seepage. A temporary push up berm using existing substrate or snow could also be placed between the diverted channel and the isolated temporary workspace and excavation location to allow water to flow around the isolated work area.

It is unknown whether aquatic organisms will be present in the active channel at the project area at the time of project activities. The environmental screening completed August 15, 2017 identified a maximum channel depth of 0.5 m, with flows anticipated to be much lower, or dry, or frozen to the bottom at the time of project works. The environmental screening identified no fish species records for the Saline River, but records for the adjacent Mackenzie River in the project

area with which the Saline River is confluent, identified the potential presence of Northern Pike, Arctic Grayling, Burbot, Longnose Sucker, Lake Chub, Walleye, Inconnu, Arctic Cisco, Goldeye, Mountain Whitefish, and Round Whitefish in the project area. If conditions represent dry or frozen to the bottom at the project area at the time of project activities, these species would not be impacted. Alternatively, low flow conditions under the ice may not allow for suitable overwintering habitat or spawning habitat in the project area for these species, as they are likely to utilize deeper areas of the Mackenzie River downstream, or upstream areas of increased depth. High flow conditions in the project area, if encountered, may allow for fish passage in the project area during project activities, and these would be accounted for by diverting the channel to the main active channel around the project area.

A *Department of Fisheries and Oceans ("DFO") Fisheries Act* Self-Assessment was completed for the Saline River in the project area under section 7.0 of Appendix I. This assessment identifies the potential pathways of effects on the local fish species community and identifies the recommended mitigation measures being employed by the various isolation options for the project to address these potential risks. These include:

- Use of end of intake pipe screens following DFO End-of-Pipe Screen Guidelines to prevent entrainment or impingement of fish on pump screens.
- Water levels during dewatering will be monitored to prevent dewatering of areas downstream of the isolated work area.
- Any isolated areas will be salvaged for fish. Water levels downstream of water extraction locations will be monitored to allow for fish passage.
- Structures used for isolation will be temporary and will be removed once project activities are complete.
- For Option 1, no mitigation measures related to maintaining flow as flow would not be present.
- For Option 2, downstream flow will be maintained as water will be released at low flow to prevent scour or onto a designated water discharge area lined with geotextile material or similar to prevent scouring of the channel bed.
- For Option 3, downstream flow will be maintained as water will be temporarily diverted into areas of the existing channel around the isolated work area.

Water discharge will involve dewatering of the excavation area due to groundwater infiltration, and hydrovac slurry (consisting of groundwater and existing river substrate material) resulting from exposing the existing pipeline in the project area. There are no expectations of contamination with no previous reports of spills in the project area. The discharge locations are to occur within the temporary workspace within the high water mark outside of the active wetted channel, to be determined based on site conditions and discussions with the Government of Northwest Territories ("GNWT") Inspector. Water discharge will follow the recommended mitigation measures provided in Table 5 of Appendix I of the application, including:

- Notify the Enbridge Environmental Inspector of any plans to discharge water to determine whether sampling or treatment is required before discharging to the

environment. Sampling or treatment of discharged water would be determined to be required if the water contained the following:

- Oil residue;
- Gaseous odour;
- Discoloured soil; and/or
- Sheen on water.

- Where possible, discharge locations should be as close to the dewatered areas as possible to maintain the local water table elevation (but not so close to impact the work area).
- Suitable discharge locations will be reviewed and confirmed by the Enbridge Environmental Inspector, the Enbridge Construction Manager, and the Contractor.
- Suitable water discharge locations will be communicated to the GNWT Inspector prior to discharge.
- Filter bags are required for water discharged into the environment to prevent erosion and sediment deposition.
- Water discharged into the environment shall be directed to the suitable discharge locations, which may include sediment removal basins (comprised of filter bags or similar to prevent erosion and sediment deposition), or similar, located in areas within the temporary workspace
- Discharge locations will be routinely inspected.

Stockpiled Materials and Backfilling of Stockpiled Materials

Material excavated to expose the pipeline will be stored within the temporary workspace within the high water mark, outside of the active wetted channel. Material will consist of native river substrate, and will be sorted into size classes of fine sediments, gravel, cobble and larger material. Upon completion of the assessment of the excavated pipeline, the stockpiled materials will be returned to the excavation to match the existing profiles of size classes. The existing channel grade and the site will be reclaimed to generally match pre-disturbance conditions.

The stockpiling of excavated river substrate material is occurring on dry areas within the isolated area to prevent sedimentation to the active wetted channel in the project area. Mitigation measures for soil management are provided in Table 4 of Appendix I, and include:

- Soil disturbance will only occur within the designated areas of the Project required for surface or subsurface work.
- Work will be suspended to minimize disturbance during wet conditions or other conditions that contravene these recommended mitigation measures.
- Remove soil in lifts, keeping separation between the topsoil and subsoil spoil piles.
- If space is limited, separate soil piles using geotextiles.
- Do not place stripped soils in any surface water drainage paths.
- Topsoil and upper subsoil stock piles must be located within the Project footprint.

- Stockpiled topsoil shall be located on undisturbed topsoil. Stockpiled subsoil shall be located on areas where the topsoil has been removed.
- Clearly label temporary soil storage piles as “topsoil” and “subsoil”, as appropriate, to prevent inadvertent admixing or improper backfilling.
- Stockpile locations shall be approved in writing by a GNWT Inspector if located within the bed and banks of the Saline River.
- Use equipment with fine depth control (e.g., grader or dozer) to strip variable depth topsoil, or river substrate material.
- Topsoil and river substrate depths and handling methods are directed by the EI. Where topsoil depth or river substrate depth is not distinguishable by colour, the EI, or other qualified person, will provide direction based on soil texture and substrate structure.
- Do not push or store graded or stripped material in treed areas.
- Store material in discrete piles or windrows.
- Ensure that stripped or graded soil or river substrate material does not spread outside of the Project area. Do not mix topsoil with subsoil fill.
- If drifting soils or topsoil loss is evident in areas prone to wind erosion, conduct the following:
- Suspend topsoil stripping operations during high winds; and/or
- Apply a tackifier to the stripped topsoil pile; and/or
- Install wind barriers.
- Topsoil handling will be suspended during high winds when soil erosion is evident and during heavy rains if soil becomes saturated. Topsoil will not be handled until winds have decreased and topsoils have drained and dried.
- Grade to re-establish surface drainage patterns and maintain existing site grades.
- Reduce disturbance to natural drainage channels during grading. Avoid blocking channels with graded material.

As substrate materials are being separated and replaced to match pre-construction profiles, the re-mobilization of excavated material will be the same for undisturbed areas adjacent to the project. The substrate consists of predominantly gravel and cobble material, which is highly mobile under high flow conditions. Fine sediments resulting from dewatering of the excavation area and hydrovac slurry material will be placed with other similar materials based on existing stratification of adjacent substrate, so mobilization of fines after construction will not occur.

Monitoring locations and potential for contaminated water

The project is occurring within the high water mark of the Saline River, and all water encountered with dewatering the excavation is assumed to be existing infiltrating groundwater from the watercourse. There is no reason to expect contamination as there are no documented historical spills in the project area or access to the project area. As addressed in Table 6 of Appendix I, soil, water or slurry material associated with the excavation will be considered contaminated if any of the following are found:

- Oil residue;

- Gaseous odour;
- Discoloured soil; and/or
- Sheen on water.

If these are encountered, then the following mitigation measures from Table 6 would be followed:

- Site activities should cease immediately and equipment should be removed from the area if any contaminated material is suspected.
- Notify the Enbridge Environmental Inspector ("EI") of the suspected contamination and the applicable investigation and sampling will be completed to confirm any impacts.
- If contaminated soil or water is suspected or discovered outside of the proposed excavation area, suspend all work in the area and notify the EI. Work will not proceed in the area until handling and disposal plans are created with the Enbridge Construction Manager.
- Upon the discovery of potential impacted soil outside of the excavation area the EI will consult with the Enbridge Environmental Lead to determine proper sampling requirements.
- If required, the Enbridge Environmental Lead will notify the National Energy Board and other applicable regulators of the newly discovered impacts (e.g. NWT Spill Line).
- If contaminated soil is required to be stored on-site, it must be:
- Stored on an impervious membrane and surrounded by a berm to contain any water run-off;
- Stored and marked separate from clean soil stockpiles; and
- Stored away from surface water drainage paths.
- Minimize the amount of contaminated soil exposed to open air to control odours and potential air quality issues.
- Wet contaminated materials must be stored in suitable containers or tanks. Contaminated materials will be disposed of as per the Waste Management Plan.
- Consult with the EI prior to disposing any contaminated waste to ensure all sampling requirements are met and an approved facility is lined up to receive the wastes.

In addition, the measures outlined in Appendix VI: Spill Contingency Plan will be followed.