

REVIEW COMMENT TABLE

Annual Reports - Line 21 Maintenance Dig at Saline River (S17P-005 and S17L1-004) (SLWB)

File(s): [S17L1-004](#) [S17P-005](#)
Proponent: Enbridge Pipelines (NW) Inc.
Reviewer Comments Due By: Apr 18, 2019
Proponent Responses Due By: Apr 26, 2019
Documents: [S17P-005 - Line 21 Annual Land Use Permit Report - Mar 29 19.pdf](#) 9.94 MB
[S17L1-004 - Line 21 Annual Water Licence Report - Mar 29 19.pdf](#) 10.13 MB
Item For Review Distributed On Apr 1 at 18:55 [Distribution List](#)

Item Description

Enbridge Pipelines (NW) Inc. has submitted their 2018 Annual Land Use Permit Report according to Land Use Permit Condition 7 (S17P-005), and, 2018 Annual Water Licence Report in accordance with Part B Condition 8 of Water License S17L1-004. Although formal Board approval is not required for the annual reports under the Permit/License, the Board must be satisfied that the Permittee/Licensee has met the requirements of the Permit/License.

Reviewers are invited to submit any questions and/or comments by April 18, 2019.

General Reviewer Information

All documents that have been uploaded to this review are also available on the Public Registry. If you have any questions or comments regarding this review or the Online Review System please contact:

Bonnie Bergsma at (867) 496-2778 or bonnie.bergsma@slwb.com
(OR)

Aswathy Varghese at (867) 598- 2413 ext. 223 or ash.varghese@slwb.com

Contact Information

Aswathy Varghese 8675982413 Bonnie Bergsma

Comment Summary

Environment and Climate Change Canada: Richard Bingley				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	ECCC Comments	<p>Comment ECCC has reviewed Enbridge Pipelines (NW) Inc.'s 2018 Annual Land Use Permit Report and 2018 Annual Water Licence Report for the Line 21 Maintenance Dig at Saline River (S17P-005 and S17L1-004) in accordance with the department's mandate and has no comments at this time.</p> <p>Recommendation N/A</p>		
Fisheries and Oceans Canada: Triage Group Fisheries Protection Program				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	DFO, Fisheries Protection Program	<p>Comment Based on the information provided, the Program has insufficient information to determine if the applicant's proposal could result in serious harm to fish.</p> <p>Recommendation DFO requests that the applicant visit our website at www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html and undertake a Self-Assessment to determine if DFO needs to review their project. If their project IS NOT in one of the listed waterbody types, and its activities ARE NOT listed, nor does it meet the associated criteria (if applicable), the Proponent may need to submit a Request for Review to DFO before proceeding further with in-water works. To be in compliance with the Fisheries Act, it is recommended that the applicant follow our guidance tools which can be found at the following website (<a 25="" 580="" 932="" 947"="" data-label="Page-Footer" href="http://www.dfo-</p> </td> <td> <p>Apr 26: A Department of Fisheries and Oceans (DFO) Fisheries Act Self-Assessment was completed for the Saline River in the Project area prior to execution of the Project. Based on the Self-Assessment and incorporation of recommended mitigation measures, the Project posed a low risk to causing serious harm to fish and fish habitat. Enbridge respectfully refers the reviewer to the application filed in November 2017, section 7.0 of Appendix I.</p> </td> <td> <p>May 7: Proponent response is acceptable.</p> </td> </tr> </tbody> </table> </div> <div data-bbox="> <p>http://lwbors.yk.com/LWB_IMS/ReviewCommentSub/ViewCommentsPrintFriendly.aspx?id=12687</p> </p>		

		mpo.gc.ca/pnw-ppe/measures-mesures/measures-mesures-eng.html). It remains their responsibility to meet the requirements of other federal, provincial and municipal agencies. If they are able to avoid causing serious harm to fish, a further review of the proposal will not be necessary. Should the applicant have any questions or concerns about the compliance of their proposal with the Fisheries Act and/or those prohibitions of the Species at Risk Act that apply to listed aquatic species at risk, they are encouraged to contact an environmental professional familiar with measures to avoid impacts to fish and fish habitat.		
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
4	General File	Comment  ENR Letter with Comments and Recommendations Recommendation		
1	Topic 1: Summer Inspection	Comment The 2018 Annual Report notes that a site visit occurred on July 18, 2018 noting that the site was stable and showed no signs of visible erosion. Photos provided for this visit are limited to two photos on page A-18 of both dig sites. It is unclear if the photo provided for 180.168 includes the same area of the Saline River depicted in Plates 18 and 19 (i.e. the shot may be wider and the river may be dry). Recommendation 1) ENR recommends that Enbridge clarify the location of the Saline River (e.g. Plates 18 & 19) in relationship to the photos from the July 18, 2019 site visit.	Apr 26: The photo from the July 18, 2019 visit (Plate 24) was taken NW of the KP 180.68 dig location looking SE at the dig area (with isolation area at bottom of photo). To orient this photo relative to to the Project area, refer to Figure 2 of the Annual Report which shows the isolation area in relation to the KP 180.68 dig site. Plates 18 and 19 were taken to show re-establishment of flow in the isolated channel through the KP180.168 dig site (bottom of photos).	May 7: Proponent response is acceptable.
2	None	Comment None Recommendation 2) ENR recommends that in future monitoring reports, Enbridge attempt to maintain consistency of monitoring and photos to allow a comparison of areas over the reclamation period.	Apr 26: Acknowledged.	
3	Topic 2: Erosion Control Structures	Comment Section 4.1.2 of the Erosion and Sediment Control Plan notes that erosion control structures will be installed between the natural environment areas and the work zones to create isolation of the work area. The Annual Report indicates the use of an aquadam to isolate KP 180.168 and a diversion berm upslope of KP 180.28 but it isn't clear if any additional measures (e.g. silt fences) were required or installed as a component of this project. Recommendation 1) ENR recommends that Enbridge clarify if any additional erosion control measures were required and utilized during the conducted works aside from the aforementioned aquadam and diversion ditch.	Apr 26: As per the Erosion and Sediment Control Plan, a dewatering pit lined with geotextile was utilized for ground water discharge. There were no additional erosion control measures required for the work.	May 7: Proponent response is acceptable.



April 17, 2019

Bonnie Bergsma
Regulatory Specialist
Sahtu Land and Water Board
Box 1,
Fort Good Hope, NT X0E 0H0

Dear Ms. Bergsma,

**Re: Enbridge Pipelines Inc.
Water Licence – S17L1-004
Land Use Permit – S17P-005
2018 Annual Land Use Permit Report
2018 Annual Water Licence Report
Request for Comment**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the reports at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Summer Inspection

Comment(s):

The 2018 Annual Report notes that a site visit occurred on July 18, 2018 noting that the site was stable and showed no signs of visible erosion. Photos provided for this visit are limited to two photos on page A-18 of both dig sites. It is unclear if the photo provided for 180.168 includes the same area of the Saline River depicted in Plates 18 and 19 (i.e. the shot may be wider and the river may be dry).

Recommendation(s):

- 1) ENR recommends that Enbridge clarify the location of the Saline River (e.g. Plates 18 & 19) in relationship to the photos from the July 18, 2019 site visit.

- 2) ENR recommends that in future monitoring reports, Enbridge attempt to maintain consistency of monitoring and photos to allow a comparison of areas over the reclamation period.

Topic 2: Erosion Control Structures

Comment(s)

Section 4.1.2 of the Erosion and Sediment Control Plan notes that erosion control structures will be installed between the natural environment areas and the work zones to create isolation of the work area. The Annual Report indicates the use of an aquadam to isolate KP 180.168 and a diversion berm upslope of KP 180.28 but it isn't clear if any additional measures (e.g. silt fences) were required or installed as a component of this project.

Recommendation(s):

- 1) ENR recommends that Enbridge clarify if any additional erosion control measures were required and utilized during the conducted works aside from the aforementioned aquadam and diversion ditch.

Comments and recommendations were provided by ENR technical experts in the Water Management and Monitoring Division and the Sahtu Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Environmental Stewardship and Climate Change Division.

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Environmental Stewardship and Climate Change Division
Department of Environment and Natural Resources
Government of the Northwest Territories