

REVIEW COMMENT TABLE

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S20L3-003 - Draft Water Licence Conditions - Municipal - Charter Community of Fort Good Hope (SLWB)

File(s): [S20L3-003](#)
Proponent: Charter Community of Fort Good Hope
Reviewer Comments Due By: Jan 25, 2021
Proponent Responses Due By: Jan 28, 2021
Documents: [S20L3-003 - Draft Water Licence Conditions - Jan 18 21.pdf](#) 564 KB
Item For Review Distributed On Jan 19 at 00:01 [Distribution List](#)
Item Description

A draft Water Licence is hereby distributed as a separate online review item to serve as the second round of review for the S20L3-003 WL (Renewal of S15L3-002) application. This draft licence has been prepared using Standard Water Licence Conditions and licence conditions transferred from S15L3-002.

The first round of review can be accessed through this link http://lwbors.yk.com/LWB_IMS/ReviewComment.aspx?appid=13119.

Please provide comments for the attached draft water licence conditions, especially on the condition for "Waste Disposal Facilities Flow Pathway Study" (Draft WL S20L3-003, Condition F.20). Most SNP monitoring locations still needed to be validated with results from the Waste Disposal Facilities Pathway Study (S15L3-002, Condition D.18). Charter Community of Fort Good Hope has requested to amend condition D.18 (now transferred into the draft WL S20L3-003 as Condition F.20) and wants to continue SNP monitoring for the next five years to do the flow pathway study.

General Reviewer Information

All documents that have been uploaded to this review are also available on our public registry. If you have any questions, please contact Aswathy Mary Varghese, Regulatory Specialist at ash.varghese@slwb.com.

Contact Information Aswathy Varghese 8675982413 Jenna Grandjambe

Comment Summary

GNWT - ENR - EAM (Environmental Assessment and Monitoring): Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Response
17	General File	Comment  ENR Letter with Comments and Recommendations Recommendation		
1	Topic 1: Sewage/Solid Wastes from Operators Working Outside of FGH	Comment Part F, Item 5 of the draft Water Licence presents two alternatives relating to solid and sewage waste from commercial, industrial and institutional operators working outside of the local government boundaries of Fort Good Hope. ENR favors the first choice towards providing guidance within the body of the Water Licence, rather than requesting a separate Commercial and Industrial Operators Waste Management Plan. It may also appear that the condition in Part F, Item 5 (no solid and Sewage waste accepted from operators working outside of Fort Good Hope) may not align with Schedule 1 e). However, the text substitution in Schedule 1 e) of 'as approved by the inspector' by 'if exceptionally approved	Applicant has no responses for this public review.	Comment acceptable

		<p>by an Inspector', could correct this inconsistency by further describing the 'infrequent' 'extraordinary' nature of the acceptance of these types of wastes by an inspector.</p> <p>Recommendation 1) ENR recommends that the draft condition "The Licensee shall not accept sewage and solid Wastes generated by industrial, commercial, and institutional operators working outside of the local government boundaries of Fort Good Hope unless authorized in writing by an Inspector" in Part F, Item 5, be selected and kept in the final version of the Water Licence.</p>		
2	None	<p>Comment None</p> <p>Recommendation 2) ENR recommends that the 'capital S' used in the Water Licence to designate sewage, be reversed to a 'small s', as currently done throughout the Water Licence when referring to other types of wastes, such as solid wastes (see Part F Item 5, and elsewhere).</p>		Comment acceptable.
3	None	<p>Comment None</p> <p>Recommendation 3) ENR recommends that Schedule 1 e) be removed from the draft Water Licence to be consistent with Part F Item 5, or revised to clarify the exceptional or infrequent acceptance of sewage and solid wastes from outside the local government boundaries of Fort Good Hope.</p>		Recommendation acceptable.
4	Topic 2: Hazardous Wastes at the Solid Waste Disposal Facility (SWDF)	<p>Comment The May 2018 ENR inspection report specifies a large amount of hazardous wastes stored at the SWDF that appeared to be generated by local contractors (Figure 8), aligning with Section 3.3.1 of the Waste Facilities Report specifying that local businesses were allowed to dispose of hazardous waste in designated areas for a fee. Part F, Item 21 specifies: "The Licensee shall not accept hazardous Wastes at the Temporary Hazardous Waste Containment Facility generated by commercial and industrial operators. Part F, Item 6 also specifies that: "The Licensee shall not accept Hazardous Wastes generated by commercial and industrial operators at the Waste Disposal Facilities."</p> <p>Recommendation 1) ENR recommends that the condition in Part F, Item 21 of the draft Water Licence be revised as follows (or similar, if/as relevant): "The Licensee shall not accept hazardous wastes at the Temporary Hazardous Waste Containment Facility generated by commercial and industrial operators working outside of the local government boundaries of Fort Good Hope."</p>		Comment acceptable. Comments edited accordingly.
5	None	<p>Comment None</p> <p>Recommendation 2) ENR recommends that the SLWB consider removing condition in Part F, Item 6, to prevent redundancy.</p>		Comment received
6	Topic 3: Permanent Fencing at the SDF and SWDF	<p>Comment Part F, Item 12 may further specify the type of fencing that should be installed around the Sewage Disposal Facilities, in order to ensure that a durable type of fence be erected, and prevent the use of less durable fencing as illustrated in Figure 3 of the May 2018 ENR inspection. Part F, Item 22, also referring to fencing, does not specify at which facilities the fence should be installed such as specified in Part F, Item 12. Upon consultation of the draft conditions, it would appear that a condition number should be added in association with the condition</p>		Existing conditions are sufficient for the Fencing Plan

		listed under Part F, Item 22. Recommendation 1) ENR recommends that the Board consider updating Part F, Item 12 of the draft Water Licence as follows (or similar): “... the Licensee shall install permanent fencing at the Sewage Disposal Facilities to limit access ..”		
7	None	Comment None Recommendation 2) For clarity purposes, ENR recommends that Part F, Item 22 refer specifically to Solid Waste Disposal Facilities.		As explained in Page 19 of the Waste Facilities Report, fencing is for Solid and Sewage Disposal Facilities. Clarification added to the water licence conditions.
8	None	Comment None Recommendation 3) ENR recommends that a condition number be added under Part F Item 22, if/as appropriate.		Comment acceptable. Condition number added.
9	Topic 4: Specific Facilities, Rather than 'Waste Disposal Facilities' (where Relevant)	Comment The term 'Waste Disposal Facilities' is used throughout the draft Water Licence. ENR notes that according to the definition in the Water Licence, the term 'Waste Disposal Facilities' refers to all SWDF, SDF, Temporary Hazardous Waste Containment Facility and Bagged Toilet Waste Disposal Facilities. While it is appropriate to refer to all facilities in some cases as they are all located within the same area; however, it may at times remove the ability to identify which specific facilities are being referred to. For example, in the SNP section of the draft Water Licence, descriptions for SNP monitoring station relating to the Waste Disposal Facilities such as “west side of the Waste Disposal Facilities” may not provide the necessary clarity to understand the exact location (see descriptions provided for SNP 2015-3 to 2015-9 in SNP section). A location description such as the 'west side of the Sewage Disposal Facilities', would provide more location context by specifying which of the Waste Disposal Facilities is being monitored specifically, helping the Licensee further understand exactly where each monitoring location should be. Specifying which Waste Disposal Facilities is being monitored in the SNP location description will also facilitate a more precise results interpretation, in order to decipher and identify quickly which ones of the four Waste Disposal Facilities may be impacting water quality (surface water or groundwater), in order to be able to move quickly towards solutions to potential future contamination issues. Recommendation 1) ENR recommends that location description terms of the draft Water Licence, SNP Section, be revised to provide further clarify and specify which of the Waste Disposal Facilities is being targeted by monitoring efforts, as described here above.		Comment acceptable. SNP station descriptions will be updated
10	None	Comment None Recommendation 2) ENR recommends that the term Waste Disposal Facilities be reviewed within the draft Water Licence, in order to ensure it is always used in a context that will not impede clarity.		Comment received
11	Topic 5: SNP Section – Recommended Groundwater Wells Description (if/as required)	Comment The descriptions below were provided as possible monitoring and formatting when referring to potential groundwater monitoring well SNP locations, inspired by the recently issued Water Licence		Groundwater sampling frequency reduced to "Once in spring and once in Fall"

		<p>MV2019L3-0010 for the Town of Hay River: SNP Station Location Coordinates Sampling frequency Sampling Parameters Rationales 2015-X Background groundwater monitoring well TBD Twice or three times per year (see below comment) TBD To monitor the quality and elevation 2015-X Sentinel groundwater monitoring well, on the west side of the SDF TBD Twice or three times per year (see below comment) TBD To monitor the quality and elevation of groundwater flowing from the Sewage Disposal Facilities. 2015-X Sentinel groundwater well, downstream and to the ____ side of ____ (eg. area of concern such as hazardous waste, vehicle, landfarm, etc.) TBD Twice or three times per year (see below comment) TBD To monitor the quality and elevation of groundwater flowing from the Solid Waste Disposal Facilities. The current S15L3-002 SNP section requested a sampling frequency of 3 times a year for groundwater monitoring wells, while the sampling frequency in the recently approved Water Licence for Hay River SWDF was set at twice annually (once in the spring, and once in the fall). As specified in the ENR May 2018 Inspection report, page 6 of 10, GPS locations/coordinates will be outlined in a final report prepared by Dillon Consulting for MACA. Once this information becomes available, the SLWB may make the necessary change to the SNP section as administrative updates, if/as necessary.</p> <p>Recommendation 1) ENR recommends that the above SNP monitoring and formatting be considered by the SLWB for clarity and consistency, when finalizing the SNP section of the draft Water Licence for groundwater monitoring well(s).</p>		
12	None	<p>Comment None</p> <p>Recommendation 2) ENR recommends for the SLWB to consider reducing the groundwater sampling frequency from three times a year to twice annually, to be consistent with other NWT municipal Water Licences such as Hay River.</p>		Comment acceptable
13	Topic 6: SNP Section – SWDF Surface Water Monitoring	<p>Comment A site investigation was conducted by the WRO during an SNP training offered to community's staff in May 2018. As specified in the associated ENR May 2018 Inspection report (Table in p. 6-7), no surface water flow was available/observed at the time to enable the collection of a sample at SNP 2015-7 and 2015-8. For both locations, the WRO specified that "Locations needs to be validated by Waste Disposal Facilities Flow Pathway Study." ENR notes that SNP station locations' description in "older" Water Licences have often referred to the monitoring of "water flow(s)" from the SWDF, which were often deemed impractical to monitor because of the rarity of occasional flows from the SWDF. More current Water Licences tend to refer to a "runoff collection pond", representing a location at the SWDF where surface water runoff is ponding (eg. see SNP section of Hay River MV2019L3-0010 p. 40-41, Dettah MV2019L3-0009 p. 19 of 42, Fort Providence MV2016L3-0001 p. 21 of 25). This has been facilitating the collection and analyses of water samples at SWDF. The descriptions below are being provided as possible monitoring and format suggestions for potential surface water SNP station(s):</p>		Not addressed at this time

		<p>SNP Station Location Coordinates Sampling frequency Sampling Parameters Rationales 2015-X Surface water at Solid Waste Disposal Facilities (run-off collection pond at/near/along the vehicle storage area (for example) TBD Twice annually, or monthly TBD To monitor the quality of accumulated run-off from the Solid Waste Disposal Facilities. The sampling frequency currently recommended in the S15L3-002 SNP section refers to “Monthly during periods of flow (June to October)” which may typically be associated with the duration that a SDF may be decanting – which may not apply to a SWDF. The Hay River Water Licence MV2019L3-0010 could be referred to for guidance, which ‘run-off collection pond’ is recommended to be monitored twice annually, once in the spring and once in the fall. Recommendation 1) ENR recommends that the above SNP monitoring and formatting be considered by the SLWB for clarity and consistency, when finalizing the SNP section of the draft Water Licence for surface water monitoring location(s).</p>		
14	Topic 7: Flow Pathway Study	<p>Comment The GNWT, MACA and the MVLWB are currently working with researchers from Dalhousie University on a Fort Good Hope Waste Disposal Facility desktop study, in order to help determine subsurface hydraulic gradients and groundwater flow in the area (report anticipated in Spring 2021), as part of a larger research initiative regarding groundwater monitoring and subsurface wastewater treatment. Results and findings from this research would also help to justify the need (if any) for the groundwater monitoring of (or part of) the Waste Disposal Facilities. The need for the inclusion of Water Licence conditions relating to requirements of a “Flow Pathway Study” should therefore also be mindful of this research monitoring results and modeling summaries. Should such a “Flow Pathway Study” be required despite these results and research findings, Schedule 2 of the draft Water Licence should be updated to specify that results and modeling summaries from recent research initiatives should be used and integrated as appropriate/necessary, in order to inform the Waste Disposal Facilities Flow Pathway Study and, as such, support the Community of Fort Good Hope with this endeavor. It was also noted that Schedule 2, Item 1 d) of the draft Water Licence (p. 18 of 25), required the identification of a location for a ‘compliance well’ that would represent “background conditions”. ENR understand these two wells to differ; one to be located up-gradient from the footprint in order to represent natural background conditions (background well, or background conditions’ well), while the other would be located down-gradient from the footprint (sentinel groundwater monitoring well, or compliance well) to monitor potential influence to the groundwater from a specific type of waste management operations. Recommendation 1) ENR recommends that requirements of the draft Water Licence in Schedule 2 be revised in order to acknowledge Fort Good Hope specific recent research findings, that could be used to determine if a study is necessary, or integrated (as appropriate) within the Waste</p>		<p>Condition from S15L3-002 transferred to S20L3-003. Major changes to the conditions for Flow Pathway Study not addressed at this time.</p>

		Disposal Facilities Flow Pathway Study.	
15	None	<p>Comment None</p> <p>Recommendation 2) ENR recommends that details relating to 'compliance well' and 'background conditions' provided in Schedule 2, Item 1 d) be revised for accuracy.</p>	Comment received
16	Topic: Tables in Topics 5 and 6	<p>Comment Please reference ENR's submitted letter to properly view the tables in Topics 5 and 6.</p> <p>Recommendation None</p>	NA



January 25, 2020

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

Dear Aswathy Varghese,

Re:

**Charter Community of Fort Good Hope
Water Licence Renewal Application – S20L3-003
Draft Water Licence Review
Request for Review and Comments**

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

Topic 1: Sewage/Solid Wastes from Operators Working Outside of FGH

Comment(s):

Part F, Item 5 of the draft Water Licence presents two alternatives relating to solid and sewage waste from commercial, industrial and institutional operators working outside of the local government boundaries of Fort Good Hope. ENR favors the first choice towards providing guidance within the body of the Water Licence, rather than requesting a separate Commercial and Industrial Operators Waste Management Plan.

It may also appear that the condition in Part F, Item 5 (no solid and Sewage waste accepted from operators working outside of Fort Good Hope) may not align with Schedule 1 e).

However, the text substitution in Schedule 1 e) of '*as approved by the inspector*' by '*if*

exceptionally approved by an Inspector, could correct this inconsistency by further describing the 'infrequent' 'extraordinary' nature of the acceptance of these types of wastes by an inspector.

Recommendation(s):

- 1) ENR recommends that the draft condition "The Licensee shall not accept sewage and solid Wastes generated by industrial, commercial, and institutional operators working outside of the local government boundaries of Fort Good Hope unless authorized in writing by an Inspector" in Part F, Item 5, be selected and kept in the final version of the Water Licence.
- 2) ENR recommends that the 'capital S' used in the Water Licence to designate sewage, be reversed to a 'small s', as currently done throughout the Water Licence when referring to other types of wastes, such as solid wastes (see Part F Item 5, and elsewhere).
- 3) ENR recommends that Schedule 1 e) be removed from the draft Water Licence to be consistent with Part F Item 5, or revised to clarify the exceptional or infrequent acceptance of sewage and solid wastes from outside the local government boundaries of Fort Good Hope.

Topic 2: Hazardous Wastes at the Solid Waste Disposal Facility (SWDF)

Comment(s):

The May 2018 ENR inspection report specifies a large amount of hazardous wastes stored at the SWDF that appeared to be generated by local contractors (Figure 8), aligning with Section 3.3.1 of the Waste Facilities Report specifying that local businesses were allowed to dispose of hazardous waste in designated areas for a fee.

Part F, Item 21 specifies: "The Licensee shall not accept hazardous Wastes at the Temporary Hazardous Waste Containment Facility *generated by commercial and industrial operators*."

Part F, Item 6 also specifies that: "The Licensee shall not accept Hazardous Wastes generated by commercial and industrial operators at the Waste Disposal Facilities."

Recommendation(s):

- 1) ENR recommends that the condition in Part F, Item 21 of the draft Water Licence be revised as follows (or similar, if/as relevant): "The Licensee shall not accept

hazardous wastes at the Temporary Hazardous Waste Containment Facility generated by commercial and industrial operators *working outside of the local government boundaries of Fort Good Hope.*”

- 2) ENR recommends that the SLWB consider removing condition in Part F, Item 6, to prevent redundancy.

Topic 3: Permanent Fencing at the SDF and SWDF

Comment(s):

Part F, Item 12 may further specify the type of fencing that should be installed around the Sewage Disposal Facilities, in order to ensure that a durable type of fence be erected, and prevent the use of less durable fencing as illustrated in Figure 3 of the May 2018 ENR inspection.

Part F, Item 22, also referring to fencing, does not specify at which facilities the fence should be installed such as specified in Part F, Item 12.

Upon consultation of the draft conditions, it would appear that a condition number should be added in association with the condition listed under Part F, Item 22.

Recommendation(s):

- 1) ENR recommends that the Board consider updating Part F, Item 12 of the draft Water Licence as follows (or similar): “... the Licensee shall install *permanent* fencing at the Sewage Disposal Facilities to limit access ..”
- 2) For clarity purposes, ENR recommends that Part F, Item 22 refer specifically to Solid Waste Disposal Facilities.
- 3) ENR recommends that a condition number be added under Part F Item 22, if/as appropriate.

Topic 4: Specific Facilities, Rather than ‘Waste Disposal Facilities’ (where Relevant)

Comment(s):

The term ‘Waste Disposal Facilities’ is used throughout the draft Water Licence. ENR notes that according to the definition in the Water Licence, the term ‘Waste Disposal Facilities’ refers to all SWDF, SDF, Temporary Hazardous Waste Containment Facility and Bagged Toilet Waste Disposal Facilities.

While it is appropriate to refer to all facilities in some cases as they are all located within the same area; however, it may at times remove the ability to identify which specific facilities are being referred to.

For example, in the SNP section of the draft Water Licence, descriptions for SNP monitoring station relating to the Waste Disposal Facilities such as “west side of the Waste Disposal Facilities” may not provide the necessary clarity to understand the exact location (see descriptions provided for SNP 2015-3 to 2015-9 in SNP section).

A location description such as the ‘west side of the Sewage Disposal Facilities’, would provide more location context by specifying which of the Waste Disposal Facilities is being monitored specifically, helping the Licensee further understand exactly where each monitoring location should be.

Specifying which Waste Disposal Facilities is being monitored in the SNP location description will also facilitate a more precise results interpretation, in order to decipher and identify quickly which ones of the four Waste Disposal Facilities may be impacting water quality (surface water or groundwater), in order to be able to move quickly towards solutions to potential future contamination issues.

Recommendation(s):

- 1) ENR recommends that location description terms of the draft Water Licence, SNP Section, be revised to provide further clarify and specify which of the Waste Disposal Facilities is being targeted by monitoring efforts, as described here above.
- 2) ENR recommends that the term Waste Disposal Facilities be reviewed within the draft Water Licence, in order to ensure it is always used in a context that will not impede clarity.

Topic 5: SNP Section – Recommended Groundwater Wells Description (if/as required)

Comment(s):

The descriptions below were provided as possible monitoring and formatting when referring to potential groundwater monitoring well SNP locations, inspired by the recently issued Water Licence MV2019L3-0010 for the Town of Hay River:

SNP Station	Location	Coordinates	Sampling frequency	Sampling Parameters	Rationales
2015-X	Background groundwater monitoring well	TBD	Twice or three times per year (see below comment)	TBD	To monitor the quality and elevation
2015-X	Sentinel groundwater monitoring well, on the west side of the SDF	TBD	Twice or three times per year (see below comment)	TBD	To monitor the quality and elevation of groundwater flowing from the Sewage Disposal Facilities.
2015-X	Sentinel groundwater well, downstream and to the ___ side of _____(eg. area of concern such as hazardous waste, vehicle, landfarm, etc.)	TBD	Twice or three times per year (see below comment)	TBD	To monitor the quality and elevation of groundwater flowing from the Solid Waste Disposal Facilities.

The current S15L3-002 SNP section requested a sampling frequency of 3 times a year for groundwater monitoring wells, while the sampling frequency in the recently approved Water Licence for Hay River SWDF was set at twice annually (once in the spring, and once in the fall).

As specified in the ENR May 2018 Inspection report, page 6 of 10, GPS locations/coordinates will be outlined in a final report prepared by Dillon Consulting for MACA. Once this information becomes available, the SLWB may make the necessary change to the SNP section as administrative updates, if/as necessary.

Recommendation(s):

- 1) ENR recommends that the above SNP monitoring and formatting be considered by the SLWB for clarity and consistency, when finalizing the SNP section of the draft Water Licence for groundwater monitoring well(s).
- 2) ENR recommends for the SLWB to consider reducing the groundwater sampling frequency from three times a year to twice annually, to be consistent with other NWT municipal Water Licences such as Hay River.

Topic 6: SNP Section – SWDF Surface Water Monitoring

Comment(s):

A site investigation was conducted by the WRO during an SNP training offered to community’s staff in May 2018. As specified in the associated ENR May 2018 Inspection report (Table in p. 6-7), no surface water flow was available/observed at the time to enable the collection of a sample at SNP 2015-7 and 2015-8. For both locations, the WRO specified that “Locations needs to be validated by Waste Disposal Facilities Flow Pathway Study.”

ENR notes that SNP station locations’ description in “older” Water Licences have often referred to the monitoring of “*water flow(s)*” from the SWDF, which were often deemed impractical to monitor because of the rarity of occasional flows from the SWDF. More current Water Licences tend to refer to a “runoff collection pond”, representing a location at the SWDF where surface water runoff is ponding (eg. see SNP section of Hay River MV2019L3-0010 p. 40-41, Dettah MV2019L3-0009 p. 19 of 42, Fort Providence MV2016L3-0001 p. 21 of 25). This has been facilitating the collection and analyses of water samples at SWDF.

The descriptions below are being provided as possible monitoring and format suggestions for potential surface water SNP station(s):

SNP Station	Location	Coordinates	Sampling frequency	Sampling Parameters	Rationales
2015-X	Surface water at Solid Waste Disposal Facilities (run-off collection pond at/near/along the vehicle	TBD	Twice annually, or monthly	TBD	To monitor the quality of accumulated run-off from the Solid Waste Disposal Facilities.

	storage area (for example)				
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The sampling frequency currently recommended in the S15L3-002 SNP section refers to “*Monthly during periods of flow (June to October)*” which may typically be associated with the duration that a SDF may be decanting – which may not apply to a SWDF. The Hay River Water Licence MV2019L3-0010 could be referred to for guidance, which ‘run-off collection pond’ is recommended to be monitored twice annually, once in the spring and once in the fall.

Recommendation(s):

- 1) ENR recommends that the above SNP monitoring and formatting be considered by the SLWB for clarity and consistency, when finalizing the SNP section of the draft Water Licence for surface water monitoring location(s).

Topic 7: Flow Pathway Study

Comment(s):

The GNWT, MACA and the MVLWB are currently working with researchers from Dalhousie University on a Fort Good Hope Waste Disposal Facility desktop study, in order to help determine subsurface hydraulic gradients and groundwater flow in the area (report anticipated in Spring 2021), as part of a larger research initiative regarding groundwater monitoring and subsurface wastewater treatment.

Results and findings from this research would also help to justify the need (if any) for the groundwater monitoring of (or part of) the Waste Disposal Facilities. The need for the inclusion of Water Licence conditions relating to requirements of a “Flow Pathway Study” should therefore also be mindful of this research monitoring results and modeling summaries.

Should such a “Flow Pathway Study” be required despite these results and research findings, Schedule 2 of the draft Water Licence should be updated to specify that results and modeling summaries from recent research initiatives should be used and integrated as appropriate/necessary, in order to inform the Waste Disposal Facilities Flow Pathway Study and, as such, support the Community of Fort Good Hope with this endeavor.

It was also noted that Schedule 2, Item 1 d) of the draft Water Licence (p. 18 of 25), required the identification of a location for a 'compliance well' that would represent "background conditions". ENR understand these two wells to differ; one to be located up-gradient from the footprint in order to represent natural background conditions (background well, or background conditions' well), while the other would be located down-gradient from the footprint (sentinel groundwater monitoring well, or compliance well) to monitor potential influence to the groundwater from a specific type of waste management operations.

Recommendation(s):

- 1) ENR recommends that requirements of the draft Water Licence in Schedule 2 be revised in order to acknowledge Fort Good Hope specific recent research findings, that could be used to determine if a study is necessary, or integrated (as appropriate) within the Waste Disposal Facilities Flow Pathway Study.
- 2) ENR recommends that details relating to 'compliance well' and 'background conditions' provided in Schedule 2, Item 1 d) be revised for accuracy.

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