

## Review Comment Table

<b>Board:</b>	MVLWB
<b>Review Item:</b>	Enbridge Pipelines (NW) Inc. - New Land Use Permit and Water Licence Applications - DRAFT Work Plan (MV2017P0013 and MV2017L1-0002)
<b>File(s):</b>	<a href="#">MV2017L1-0002</a> <a href="#">MV2017P0013</a>
<b>Proponent:</b>	Enbridge Pipelines Inc.
<b>Document(s):</b>	<a href="#">DRAFT Work Plan</a> (394 Kb)
<b>Item For Review Distributed On:</b>	Aug 10 at 10:49 <a href="#">Distribution List</a>
<b>Reviewer Comments Due By:</b>	Aug 16, 2017
<b>Proponent Responses Due By:</b>	Aug 17, 2017
<b>Item Description:</b>	<p>The Mackenzie Valley Land and Water Board (MVLWB) staff has developed a Draft Work Plan for the Enbridge Pipelines (NW) Inc. (Enbridge) Land Use Permit (MV2017P0013) and Water Licence (MV2017L1-0002) Applications. Reviewers are invited to submit questions, comments, and recommendations using the Online Review System (ORS) by the review comment deadline specified below.</p> <p>Please note that the MVLWB staff are working with the National Energy Board staff to coordinate the two regulatory processes in the review of Enbridge Applications where possible.</p> <p>All documents that have been uploaded to this review are also available on our public registry. If you have any questions or comments about the ORS or this review, please contact Board staff identified below.</p>
<b>General Reviewer Information:</b>	<p>In addition to the email distribution list, the following organizations received review materials by fax:</p> <p>Fort Liard Metis Local #67 Ernie McLeod President (867)770-4573;</p> <p>Fort Simpson Métis Local #52 Marie Lafferty President (867)695-2040;</p> <p>Hay River Metis Council Trevor Beck President (867)874-4472; <a href="mailto:hrmc@northwestel.net">hrmc@northwestel.net</a>;</p> <p>Northwest Territory Métis Nation Garry Bailey c/o Tim Heron NWTMN IMA Coordinator (867)872-3586; <a href="mailto:rcc.nwtmn@northwestel.net">rcc.nwtmn@northwestel.net</a>;</p>
<b>Contact Information:</b>	<p>Angela Love 867-766-7456 Jen Potten 867-766-7468</p>

## Comment Summary

Environment and Climate Change Canada: Loretta Ransom				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	ECCC - No Comments	<b>Comment</b> Environment and Climate Change Canada (ECCC) has reviewed the Draft Work Plan and has no comments at this time. <b>Recommendation</b> N/A		
GNWT - Lands: Tamika Mulders				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<b>Comment</b> ( <a href="#">doc</a> ) GNWT Response to MVLWB Draft Workplan <b>Recommendation</b>		
Sambaa Ke First Nation (Trout Lake): Jessica Jumbo				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General File	<b>Comment</b> ( <a href="#">doc</a> ) General <b>Recommendation</b>		



Angela Love  
Regulatory Officer  
Mackenzie Valley Land and Water Board  
7th Floor – 4910 50th Avenue  
P.O. Box 2130  
YELLOWKNIFE, NT X1A 2P6

AUG 15 2017

Dear Ms. Love:

**GNWT Response to Enbridge Pipelines Inc. Draft Workplan for MVLWB Water Licence and Land Use Permit Applications (MV2017P0013 and MV2017L1-0002)**

The Government of the Northwest Territories (GNWT) has reviewed Mackenzie Valley Land and Water Board's (MVLWB) draft workplan for the water licence and land use permit applications for Enbridge's proposed Line 21 Segment Replacement Project. At this time, the GNWT has no specific comments or recommendations on the draft workplan.

The GNWT appreciates the efforts being made to coordinate the MVLWB and National Energy Board (NEB) regulatory processes, and looks forward to reviewing an updated workplan from the NEB. The GNWT strongly supports a coordinated review.

The GNWT will continue to participate in the MVLWB and NEB processes, including any joint public hearing that may be organized. GNWT would be pleased to participate in any discussions that may be organized regarding the review processes.

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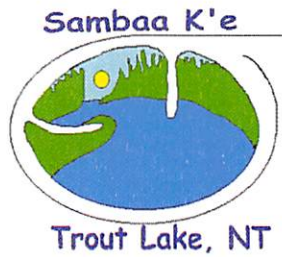
If parties have any questions or concerns, please contact Lorraine Seale, Director, Securities and Project Assessment by phone at (867) 767-9180 (Ext. 24020), email at [Lorraine Seale@gov.nt.ca](mailto:Lorraine.Seale@gov.nt.ca); or Tamika Mulders, Project Assessment Analyst, by phone at (867) 767-9180 (Ext. 24022), or by email at [Tamika Mulders@gov.nt.ca](mailto:Tamika.Mulders@gov.nt.ca).

Sincerely,

A handwritten signature in black ink, appearing to read 'L Seale', written in a cursive style.

Lorraine Seale  
Director  
Securities and Project Assessment  
Lands

- c. Ms. Sarah McKenzie, Regulatory Specialist, Enbridge Pipelines (NW) Inc.  
Ms. Sheri Young, Secretary of the Board, National Energy Board



Sambaa K'e First Nation  
P.O. Box 10, Sambaa K'e, NT X0E 1Z0  
Phone: (867) 206-2800 Fax: (867) 206-2828

Angela Love  
Regulatory Specialist  
Mackenzie Valley Land and Water Board  
[angela.love@mvlwb.com](mailto:angela.love@mvlwb.com)  
867-766-7456

and/or Jen Potten  
Regulatory Coordinator  
Mackenzie Valley Land and Water Board  
[jpotten@mvlwb.com](mailto:jpotten@mvlwb.com)  
867-766-7468

*Sent by e-mail*

14 August, 2017

**Re: MVLWB Draft Work Plan for Enbridge Pipelines Inc. March 2017 Applications  
Water Licence MV2017L1-0002 and Land Use Permit MV2017P0013**

Dear Angela Love and/or Jen Potten,

Thank you for the opportunity to comment on the Mackenzie Valley Land and Water Board's Draft Work Plan for the Enbridge Pipelines Inc. March 2017 applications for a water license and land use permit for the Line 21 Segment Replacement Project "Project".

SKFN looks forward to participating in the review process and public hearing. The proposed timelines associated with the work plan appear to be reasonable.

On page 1-2 of the work plan, the MVLWB describes the "scope of activities as considered by MVLWB (off the right of way)" and provides a list of activities that are focused on construction activities outside of the right of way.

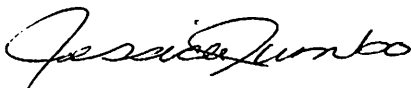
It is SKFN's position that the scope of the project must necessarily include not only construction activities but also relevant implications for future pipeline operations. Line 21 is now over thirty years old and Enbridge's current application will extend the operating life of the pipeline for an unspecified amount of time.

Line 21 crosses through a region of rapidly deteriorating discontinuous permafrost. Consequent ground instability and dramatic changes to regional hydrological regimes are now well documented. Both the age of the pipeline and the terrain sensitivity likely make the pipeline vulnerable to future failures. Indeed, it would seem that the current segment replacement is required for both of these causes (age and ground instability) and that the current proposed project is but one piece of a patchwork of repairs that has not previously triggered the regulatory process.

SKFN therefore intends to present our concerns to the MVLWB in their entirety in spite of the limited scope outlined in the Board's work plan. In addition, it is not clear to us how our concerns can be divided into an artificial boundary (within and outside of the right of way) and therefore we trust that the NEB and MVLWB will harmonize their processes accordingly and determine how the combined processes can meaningfully address the issues raised.

We look forward to working with you to ensure that the proposed segment replacement and the continued Enbridge pipeline operations respect our traditional lands and our continuing role as the stewards of that land.

Respectfully,



Jessica Jumbo

Environmental Coordinator  
Sambaa K'e First Nation  
Box 10 Sambaa K'e, NT X0E 1Z0  
P: (867)206 2800  
F: (867) 206 2828  
environment@sambaakefn.com