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December 22, 2022

File: MV2020L1-0007

Terence Hughes
Regulatory and Community Affairs Advisor
Paramount Resources Ltd.
Suite 2800 – 421, 7th Avenue SW
Calgary AB T2P 4K9

Sent by email

Dear Terence Hughes,

Re: Erosion and Sedimentation Management Plan Version 2 – Not Approved – Paramount Resources Ltd Fort Liard East – Industrial Undertaking – Fort Liard, NT

The Mackenzie Valley Land and Water Board (Board) met on December 21, 2022 and considered the Erosion and Sedimentation Management Plan Version 2,¹ submitted by Paramount Resources Ltd. (Paramount) on May 31, 2022 as required by Water Licence (Licence) MV2020L1-0007.

The Board has not approved the Erosion and Sedimentation Management Plan Version 2 based on the concerns expressed during the public review.

As per Part B, Condition 11, REVISE AND SUBMIT in the Licence, the Board requires that Paramount revise the Erosion and Sedimentation Management Plan and submit Version 2.1 to the Board in accordance with the directives in Table 1, for approval, by **January 23, 2022**. The revision must be prepared in accordance with the Land and Water Boards' *Document Submission Standards*² and *Standard Outline for Management Plan*.³ Once submitted, the revised Erosion and Sedimentation Management Plan will undergo the Board's standard public review process before being considered by the Board.

¹ See MVLWB Online Registry [www.mvlwb.com] for [Liard East - ESMP \(V2\) - May31_22](#)

² See MVLWB Policies and Guidelines webpage for MVLWB [Document Submission Standards](#).

³ See MVLWB Policies and Guidelines webpage for MVLWB [Standard Outline for Management Plans](#).

Please direct questions or concerns regarding this letter to [Shelagh Montgomery](#) in writing.

Yours sincerely,



Mavis Cli-Michaud
Chair, Mackenzie Valley Land and Water Board

BCC'd to: Paramount Distribution List
 Wendy Bidwell – Inspector, GNWT-ENR

Attachments: Table 1 Board Directives

Attachment 1

Table 1: Board Directives

Item	Outstanding items requiring updating	Review comment reference
1.	Update the Plan to indicate the status of well sites C-76, F-66, J-76, B-41 and any other project components not discussed within the Plan (borrow pits, campsites, watercourse crossings, and sumps), and the activities planned for these sites and components, as per Paramount's response.	MVLWB 1 and 3
2.	Update the Plan with information pertaining to how risk levels were determined for each activity, including those referred to in directive 1.	MVLWB 6
3.	Update the reference to the correct appendices.	MVLWB 2
4.	Update the Plan to clarify what monitoring methods are applicable during site activities as well as after site activities have concluded, including remediation and reclamation activities and those needed to support such activities, such as watercourse crossings and use of borrow pits.	ADKFN 6, 7, MVLWB 7, 8, 11
5.	Update the Plan to clarify what controls will be utilized during site activities as well as after site activities have concluded to mitigate the risk of erosion and sedimentation, including remediation and reclamation activities and those needed to support such activities, such as watercourse crossings and use of borrow pits.	ADKFN 6, 7, MVLWB 7, 8, 11
6.	Update the Plan to clarify what Action Levels are applicable during site activities as well as after site activities have concluded, including remediation and reclamation activities and those needed to support such activities, such as watercourse crossings and use of borrow pits.	ADKFN 6, 7, MVLWB 7, 8, 11
7.	Update the Plan to clarify what response mechanisms, associated with each Action Level, apply to during site activities as well as after site activities have concluded, including remediation and reclamation activities and those needed to support such activities, such as watercourse crossings and use of borrow pits.	ADKFN 6, 7, MVLWB 7, 8, 11
8.	Update the Plan with the proponent's response and any mitigation necessary for activities conducted in the winter so as to limit the risk of erosion and sedimentation during freshet and summer. If Paramount determines that mitigation is not necessary, provide supporting rationale as to how this was determined and describe what monitoring will be done to evaluate whether site activities resulted in erosion and sedimentation.	ADKFN 3 and 4
9.	Update the Spill Contingency and Engagement Plans to indicate that ADKFN will be notified in the event of an environmental incident, including the erosion of soils and release into water and spills.	ADKFN 6
10.	Update the Plan to clarify what constitutes a significant deposit of sediment so as to warrant notifying parties.	ADKFN 6
11.	Update the Plan by indicating the length of time after the event in which Paramount will notify parties.	ADKFN 6