



7th Floor - 4922 48th Street,
P.O. Box 2130, Yellowknife NT X1A 2P6

Tel: 867-669-0506 Fax: 867-873-6610
www.mvlwb.com

November 23, 2020

Files: MV2020L1-0011

James Agate
Manager, Reclamation
Canadian Natural Resources Ltd.
2500, 855 – 2 Street S.W.
Calgary, Alberta
T2P 4J8

Sent by email

Dear James Agate:

**Type B Water Licence Application – Incomplete
Industrial Undertaking – Northeast of Fort Liard, NT**

On November 13, 2020, the Mackenzie Valley Land and Water Board (Board) staff received a Type B Water Licence Application (MV2020L1-0011) from Canadian Natural Resources Ltd. (CNRL) for the construction of a winter road and auxiliary activities. The Application has been reviewed by Board staff and found to be lacking sufficient information under section 5 of the Waters Regulations. For the Applications to be considered complete and forwarded for review, the following information must be submitted to the Board's office. The information can be included in the revised Application Form or with supporting information attached to the Application.

1. Engagement – Application Form Item 14

CNRL submitted an Engagement Plan which does not address engagement for the Licence that has been applied for.

Please provide an engagement log in accordance with the [MVLWB Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits \(2018\)](#) and ensure the Engagement Plan identifies how CNRL will engage with affected parties throughout the authorization, if granted.

2. Scope – Application Form Item 4

- Camp - the November 12, 2020 engagement letter submitted with the application indicates a temporary camp may be utilized. Please confirm whether a camp is part of the application and include applicable information on water use and waste management;
- Bridges / culverts - the November 12, 2020 engagement letter submitted with the application indicates repairing / removing bridges and culverts is part of the scope. Please clarify if these are permanent bridges, how many permanent bridges and culverts there are, and where they are located;

- Sumps - the November 12, 2020 engagement letter submitted with the application indicates there are petroleum hydrocarbon impacted sumps. Please clarify how where the sumps are located and how they will be remediated; and
- Please clarify what activities will occur in the winter and what will occur in the summer.

3. Water Withdrawal – Application Form Item 7

- Specify the maximum amount of water for each source per day in cubic meters (m³);
- Specify the maximum amount of water for each source per season (m³); and
- Reference the map at the end of the application in the water source / calculation portion of the application.

4. Water Source Capacity – Application Form Item 7

- Provide the math for river and creek calculations to show that the withdrawal rates are below 10% of the instantaneous flow and reference applicable DFO guidance; and
- Provide information on how the surface area was determined for each lake.

5. Security Estimate – Application Form Item 14

Provide an estimate for security using the [RECLAIM model for oil and gas](#).

6. Geospatial Information – Application Form Item 3

- Clarify the project boundaries as the coordinates in the project description of the Waste Management Plan differ from the Application; and
- Ensure the coordinates include seconds.

7. Waste Management Plan – Application Form Item 8

- Confirm there are no new waste streams from those that are captured under Table 5-1 of the Waste Management Plan;
- Provide detailed map(s) (1:50,000 or more) of well sites that identify where waste will be generated and stored prior to removal, or, clarify if there are only wellheads present and no other supporting natural gas infrastructure and indicate where waste will be generated and stored prior to removal; and
- Ensure the plan states it applies to the Licence.

8. Spill Contingency Plan – Application Form Item 10

- The plan appears to be a general company-wide emergency response / spill plan - ensure the plan is specific to the project and is in accordance with the [INAC Guidelines for Spill Contingency Planning \(2007\)](#). This includes, but is not limited to, identifying how spills could occur on land, water, ice/snow, how spills will be prevented from occurring, training for employees/contractors, and site specific response measures. Please see the INAC Guidelines section 2.0 for a complete list of contents; and
- Ensure the plan states it applies to the Licence.

9. Other

- Clarify whether there are other uses of the water sources and their total water use / rate of use (Application Form Item 9);
- Segregate corporate information into an appendix at the end of the application (the 2019YE Financial Statement and the 2020 Annual Report);
- Provide a copy of the Certificate of Corporate Registration from the GNWT (Application Form Item 2); and
- Provide cheque for application fees and water use (Application Form Item 15).

Upon receipt of this information, the Applications will be reviewed in accordance with the *Mackenzie Valley Resource Management Act* and Waters Regulation. For further assistance, please refer to the [MVLWB Guide to the Water Licensing Process \(2020\)](#).

If this supplementary information is not provided within ninety (90) days, then it shall be assumed that you do not wish to continue with the processing of these Applications, and the Applications will be returned to you.

If you have any questions or concerns, please call Andrew Wheeler at 867-766-7467.

Yours sincerely,



Andrew Wheeler
Regulatory Specialist

Copied to: Kyle Christiansen, GNWT-ENR, Water Resource Officer, Dehcho Region
Jamie Chambers, GNWT-ENR, Regional Superintendent, Dehcho Region