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October 14, 2022

File: MV2021L1-0009

Mark Cliffe-Phillips
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Re: Imperial Oil Limited – Notice of Preliminary Screening Determination – Application for Water Licence – Amendment – Well Re-Abandonment - Well B-48 – Jean Marie River, NT

The Mackenzie Valley Land and Water Board (Board) met on October 13, 2022 and considered the Application from Imperial Oil Limited (Imperial) for Water Licence (Licence) MV2021L1-0009 for the Amendment - Well Re-Abandonment (B-48) located near Jean Marie River, NT (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the public record for the proceeding. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, is attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Licence Amendment MV2021L1-0009 on **Tuesday, October 25, 2022**.

The Board and staff look forward to continued communications throughout the pause period. Please contact [Shelagh Montgomery](#) or at (867) 766-7457 with any questions or concerns regarding this letter.

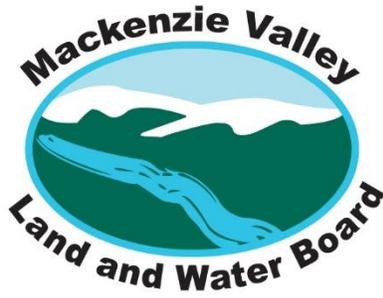
Yours sincerely,



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

BCC'd to: Dehcho Distribution List
Jaclyn Mersereau – Imperial Oil Limited
Ester Choi – Imperial Oil Limited

Attached: Preliminary Screening Determination and Reasons for Decision



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Preliminary Screening Determination and Reasons for Decision

Water Licence Amendment Application	
File Number	MV2021L1-0009
Company	Imperial Oil Limited
Project	Jean Marie River Re-Abandonment – Well B-48
Location	Jean Marie River, NT
Activity	Industrial
Date of Decision	October 13, 2022

1.0 Decision

In accordance with subsection 124(1) of the *Mackenzie Valley Resource Management Act* (MVRMA), the Mackenzie Valley Land and Water Board (MLWB or Board) met on October 13, 2022 to make a preliminary screening determination on the amendment Applications from Imperial Oil Limited (Imperial)(Applicant) for Water Licence MV2021L1-0009 (Licence)¹ for the Jean Maire River Re-Abandonment (Project).²

The Board has decided not to refer the proposed Amendment of the Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board’s opinion that the proposed Amendment of the Project will not have a significant adverse impact on the environment or be cause of public concern.

¹ See MLWB Online Registry Imperial Oil Limited– [Amendment Application](#) – Aug29_22.

² The Project is the Industrial Undertaking, which is the proposed development, where “development” is defined in Part 5 of the MVRMA as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

The Board’s determination, including reasons for its decision, are detailed in sections [3.0](#) and [4.0](#).

2.0 List of Defined Terms and Acronyms

Applicant	Imperial Oil Limited
Application	The complete application package submitted by the Applicant for Water Licence MV2021L1-0009
Board	Mackenzie Valley Land and Water Board
CRP	Closure and Reclamation Plan
EA	Environmental Assessment
GNWT	Government of the Northwest Territories
GNWT-ENR	Government of the Northwest Territories – Environment and Natural Resources
GNWT-Lands	Government of the Northwest Territories – Lands
MVLWB	Mackenzie Valley Land and Water Board
MVRMA	<i>Mackenzie Valley Resource Management Act</i>
Minister	Minister of the Government of the Northwest Territories – Environment and Natural Resources (GNWT-ENR)
ORS	Online Review System (www.new.onlinereviewssystem.ca)
Party	As per the MVLWB Rules of Procedures , an applicant, a person, or an organization participating in the regulatory proceeding for the Application.
Project	Industrial, which is the proposed development (as defined in Part 5 of the MVRMA). ³
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
Standard Licence Conditions	MVLWB Standard Water Licence Conditions Template
TK	Traditional Knowledge
WMP	Waste Management Plan

3.0 Background and Scope of Screening

On August 29, 2021, Imperial submitted an application to amend Water Licence (MV2021L1-0009) to include an additional water course crossing. The water course crossing is to be adjacent to the current bridge leading into Jean Marie River First Nation over the Ek’alia Creek.

An Engagement Record was included in the Application. Imperial noted they engaged with the following Parties:

- Jean Marie River First Nation – Ttsets’ehke’deli First Nation;
- Government of the Northwest Territories – Department of Infrastructure; and
- Office of the Regulator of Oil and Gas Operations.

³ “development” is defined in Part 5 of the MVRMA as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

Engagement commenced November 30, 2022 with follow up on the following dates:

- November 30, 2021;
- December 8, 2021;
- January 20, 2022;
- March 21, 2022;
- June 7, 2022;
- June 23, 2022;
- July 6, 2022;
- July 18, 2022; and
- July 27, 2022.

Through the engagement, Ttsets'ehke'deli First Nation noted that they would prefer that Imperial use the existing bridge and not construct the snowfill. Imperial has inquired with the GNWT-INF to obtain the bridge rating to ensure that the loads to cross the bridge can be reconfigured to meet the bridge rating. To date, GNWT – INF has not provided Imperial with the rating of the bridge.⁴

In accordance with paragraph 125 (1)(a) of the MVRMA, the Board must conduct a preliminary screening of the proposed additional watercourse crossing (Project) to determine and report to the Review Board whether, in its opinion, the proposed Project will not have significant adverse impact on the environment or be cause of public concern.

3.1 Scope of Screening:

Previously Screened or Assessed Activities:

Activities that the Board understands to have been previously considered,⁵ and which therefore do not require preliminary screening at this time, are listed below.

- Building of winter access to the well site (approximately 3.3 km);
- Cross the Jean Marie River by constructing an ice bridge capable of supporting all loads;
- Prepare the site for equipment required to perform the re-abandonment;
- Establish a camp;
- Support the logistics of the drilling rig; and
- Perform the initial - preliminary reclamation of the site.

In the Application put forward by Imperial, they indicate that the water sources and the water volume that has been approved will be sufficient. Imperial also indicated that additional fuel and equipment will not be required.

⁴ See MLWB Online Registry for Imperial Oil Limited– [Preliminary Screening and RFD](#) – Nov21_21

⁵ See MLWB Online Registry for Imperial Oil Limited– [Preliminary Screening and RFD](#) – Nov21_21

3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Application for public review on September 6, 2022, inviting reviewers to provide comments and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due September 23, 2022, with responses from the Applicant due September 28, 2022. The Board received comments and recommendations from Government of the Northwest Territories – Environment and Natural Resources and Environment and Climate Change Canada (attached).⁶

Since there were no requests to extend the reviewer comment deadline, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the MVRMA.

Pursuant to Schedule 4.1 of the Northwest Territory Métis Nation (NWTMN) Interim Measures Agreement, the Board determined that written notice was given to the NWTMN and that a reasonable period of time was allowed for NWTMN to make representations with respect to the Application.

Pursuant to section 27, paragraphs (a) and (b) of the Dehcho First Nations (DCFN) Interim Measures Agreement, the Board has determined that written notice was given to the DCFN, and that a reasonable period of time was allowed for DCFN to make representations with respect to the Application.

4.0 Potential Impacts and Proposed Mitigations

Table 1 below summarizes:

- the potential impacts of the proposed additional watercourse crossing (Project);
- the concerns that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board’s analysis of the potential impacts and proposed mitigations.

⁶ See MLWB Online Registry for Imperial Oil Limited– [Review Comment Summary Table](#) – Sept28_22.

Table 1: Potential Impacts and Proposed Mitigations for the Proposed Additional Watercourse Crossing Project

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Soil Contamination	Use of Fuel	<p>The Applicant proposed the following mitigations in the Applications:</p> <ul style="list-style-type: none"> ○ Spill Contingency Plan in place. ○ Spill kits will be located on site. ○ Equipment will be properly maintained. ○ Drilling operation is planned to take place during frozen conditions in areas with site and roads frozen in. ○ Respond immediately to any releases. ○ All spills, regardless of volume, will be documented and reported as appropriate. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the sections identified below:⁷</p> <p>Licence Part H – Spill Contingency Planning</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Soil Compaction	Construction of additional watercourse crossing	<p>The Applicant proposed the following mitigation in the Application:</p> <ul style="list-style-type: none"> ○ Works will be performed on frozen ground conditions (with additional ice layer frozen in on top) <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the sections identified below:</p> <p>Licence</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

⁷ See the MVLWB Policies and Resources webpage to access the MVLWB [Standard Water Licence Conditions Template](#) and MVLWB [Standard Land Use Permit Conditions Template](#).

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
		Part E - Construction	
Destabilization/ Erosion	Construction of additional watercourse crossing	<p>The Applicant proposed the following mitigation in the Application.</p> <ul style="list-style-type: none"> ○ Site will be monitored after project completion <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions include:</p> <p>Licence</p> <p>Part F – Waste and Water Management</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Changes in aquatic habitat	Water withdrawal	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Follow all requirements of issued licences for water diversion (location, flow rates and volume). ○ Implement DFO Code of Practice requirements for small intakes and temporary crossings as approved during project review. ○ Project activities avoid restricted timing windows for aquatic species of concern (e.g. fall spawning) <p>The Board has standard permit and licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence</p> <p>Part D – Water Use</p> <p>Part E – Construction</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Water flow or level changes (permanent, temporary, seasonal)	Watercourse crossing construction	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Water withdrawal will comply with project approvals for water diversion (flow rates and volume). ○ Estimates of water planned to be used are not expected to affect flow or levels significantly. 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
		<p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part D – Water Use Part E – Construction</p>	
Changes in air quality	Use of machines, access road construction	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Project work is relatively short duration with construction and drilling work estimated to take less than two months. ○ Ensure good functioning order and proper maintenance of any machine specifically, lubrication, mufflers on vents and air intakes. Emissions from equipment will be kept to a minimum when possible and use of combustion equipment will be optimized where possible. ○ No plans to burn timber. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part E - Construction</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Introduction of non-native (invasive) species	Access roads and site disturbance	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Invasive species can be spread or brought to site from machinery; however, due to winter conditions this is unlikely. ○ Equipment will arrive to site clean. ○ Site work (cutting, capping, and reclamation) will occur following drilling and sites will be monitored during that time for invasive species. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below</p> <p>Licence Part E - Construction Part I – Closure and Reclamation</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Effects on Plant Health (dust, metals, toxins)	Site disturbance	<p>The Applicant proposed the following mitigation in the Applications</p> <ul style="list-style-type: none"> ○ Project activities are planned during the winter conditions. Dust is expected to be limited as a result. 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Compaction of vegetation	Work on site (access, clearing,	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Work will be performed on frozen ground conditions (with additional ice layer frozen in on top) without soil horizons disturbance, to preserve soil conditions and the seed bed and avoid compaction. ○ Site will be monitoring after project completion 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
		<p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part E – Construction Part I – Closure and Reclamation</p>	
Direct injury or mortality	Access trail, camp, use of site	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Wildlife awareness and workplace housekeeping is covered in site-specific orientation package. ○ Keep distance from wildlife and adhere to speed limits. ○ Identify potential wildlife interactions that may occur prior to starting job and document on Job Safety Analysis. ○ Have appropriate mitigation in place prior to starting job (such as bear horn). ○ Report wildlife strikes and sightings to Environment and Regulatory Advisor. ○ Follow speed limits when traveling on roads. 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Disturbances to key lifecycle stages: breeding, feeding, nesting, staging	Use of the area	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Project activities avoid key life stage timing for species of concern (e.g. calving and breeding) with construction and drilling work to take place during winter. 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Human-wildlife conflicts	Use of the area	<p>The Applicant proposed the following mitigation in the Applications.</p> <ul style="list-style-type: none"> ○ Wildlife awareness and workplace housekeeping is covered in site-specific orientation package. ○ Keep distance from wildlife and adhere to speed limits. ○ Identify potential wildlife interactions that may occur prior to starting job and document on Job Safety Analysis. ○ Have appropriate mitigation in place prior to starting job (such as bear horn). ○ Report wildlife strikes and sightings to Environment and Regulatory Advisor. ○ Follow speed limits when traveling on roads. ○ Waste Management Plan in place. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part F – Waste and Water Management</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Effects on health (toxins, metals, sediment, etc.)	Use of site with withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Withdrawal points to have fish screen(s) in place to meet DFO requirements per project review. ○ Follow all requirements of issued licences for water diversion (location, flowrates and volume). ○ Implement DFO Code of Practice requirements for small intakes and temporary crossings as approved during project review. ○ Project activities avoid restricted timing windows for aquatic species of concern (e.g. fall spawning) ○ Spill Contingency Plan in place. 	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
		<ul style="list-style-type: none"> ○ Drilling operation is planned to take place during frozen conditions in areas with site and roads frozen in. ○ Respond immediately to any releases. ○ All spills, regardless of volume, will be documented and reported as appropriate. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part D – Water Use Part E – Construction Part H – Spill Contingency Planning</p>	
Effects on traditional land use, subsistence, and harvesting right	Use of site and withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Pre-submission Engagement has included both community and indigenous groups. Camp locations have incorporated siting guidance from local First Nations. ○ Jean Marie First Nation will provide a guide to participate in the September scouting sessions to provide feedback. <p>The Board has standard permit and licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part B – General Conditions</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Change to or loss of cultural integrity	Use of site and withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Engagement has included both community and indigenous groups. ○ Engagement and consultation records were included. <p>The Board has standard permit and licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part B – General Conditions</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Economic opportunities or losses (employment, training)	Use of site and withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Imperial is actively working on confirming subcontracts that will feature strong representation from the local contracting community. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions are found in the section(s) identified below:</p> <p>Licence Part B – General Conditions Part D – Water Use</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
Impairment of the recreational or traditional uses of the land or water	Use of site and withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Potential short-term increase in local activity due to construction and drilling activity. ○ Camp locations have incorporated siting guidance from local First Nations. ○ Jean Marie First Nation will provide a guide to participate in the September scouting sessions to provide feedback. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts. These standard conditions include Licence Part B – General Conditions Part D – Water Use Part E - Construction</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.
Changes to the use of the area by other non-Indigenous people (e.g., trappers, outfitters, residents, hunters, forest harvesters, other authorized projects)	Use of site and withdrawal of water	<p>The Applicant proposed the following mitigations in the Applications.</p> <ul style="list-style-type: none"> ○ Potential short-term increase in local activity due to construction and drilling activity. <p>The Board has standard licence conditions that are typically used to mitigate the described impacts These standard conditions are found in the section(s) identified below</p> <p>Licence Part B – General Conditions Part D – Water Use Part E – Construction</p>	Based on the described mitigations, it is the Board’s opinion that the proposed activities will not have a significant adverse impact on the environment or will not be a cause of public concern.

4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified above in Table 1, the Board considered whether the additional watercourse crossing Project might have a significant adverse impact on the environment. More detailed consideration of specific potential impacts and associated mitigations related are discussed below in subsections 4.1. In general, impacts of the additional watercourse crossing Project on the environment can be mitigated through the use of licence conditions of two general types:

1. conditions in the existing Licence, including requirements for management and monitoring plans, with revisions where necessary; and
2. new or unique conditions that may be needed to mitigate potential impacts of the changes to the Project that may not be addressed by the conditions in the existing Licence, and which may be from the Board's standard conditions list or established by the Board as per the MVLWB [*Standard Process for Creating New Conditions*](#).

These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

4.2 Consideration of Public Concern

In addition to considering the potential impacts of the additional watercourse crossing Project, the Board considered whether the additional watercourse crossing Project might be a cause of public concern.

Based on the evidence provided during the regulatory proceeding thus far, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed additional watercourse crossing Project. Based on the evidence, it is the Board's opinion that the proposed additional watercourse crossing Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the MVRMA. The Board has therefore decided not to refer the proposed additional watercourse crossing Project to Environmental Assessment

If the Board does not receive a notice of referral to environmental assessment by October 23, 2022, the Board can issue the Licence on October 24, 2022.

SIGNATURE



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

October 14, 2022

Date