



PO Box 32, Wekweètì NT X0E 1W0  
Tel: 867-713-2500 Fax: 867-713-2502

#1-4905 48th Street, Yellowknife NT X1A 3S3  
Tel: 867-765-4592 Fax: 867-765-4593  
www.wlwb.ca

May 23, 2023

File: N1L4-0150; W2014L4-0001; and W2021Q0011

Matthew Miller  
Northwest Territories Power Corporation  
4 Capital Drive,  
Hay River, NT, X0E 1G2

Sent by email

Dear Matthew Miller,

**Re: Emergency Preparedness Plan (EPP), Version 8.0; Spill Contingency Plan (SCP), Version 5.0; Waste Management Plan (WMP), Version 4.0 – Approved with Revisions Required – Snare Hydroelectric Facilities – Power – Snare River Watershed, NT**

The Wek'èezhì Land and Water Board (Board) met on May 18, 2023, and considered the Emergency Preparedness Plan (EPP) Version 8.0,<sup>1</sup> Spill Contingency Plan (SCP) Version 5.0,<sup>2</sup> and Waste Management Plan (WMP)<sup>3</sup> Version 4.0 submitted by the Northwest Territories Power Corporation (NTPC). The EPP is required by Licence N1L4-0150, Part E, Condition 1, and Licence W2014L4-0001, Part E, Condition 4. The SCP is required by Licence N1L4-0150, Part E, Condition 3; Licence W2014L4-0001, Part E, Condition 4; and Permit W2021Q0011, Condition 46. The WMP is required by Licence W2014L4-0001, Part B, Condition 10, and Permit W2021Q0011, Condition 31. NTPC is the Licensee for NTPC N1L4-0150 and the Permittee for W2021Q0011; Dogrib Power Corporation (DPC) is the Licensee for W2014L4-0001, but NTPC operates the facility covered by this Licence. NTPC requested that Version 5.0 of the SCP and Version 4.0 of the WMP be applicable to both Water Licences and the Permit, and that Version 8 of the EPP be applicable to both Water Licences.

The Board has decided to approve all three Plans and requires revisions to each Plan. The next versions of each Plan (i.e., Version 8.1 of the EPP, Version 5.1 of the SCP, and Version 4.1 of the WMP) are to include

<sup>1</sup> See WLWB ([www.wlwb.ca](http://www.wlwb.ca)) Online Registry for [DPC - Emergency Preparedness Plan - Dec 2022 - Dec 22 22.pdf](#)

<sup>2</sup> See WLWB Online Registry for [DPC - Spill Contingency Plan - Version 5.0 - Dec 22 22.pdf](#)

<sup>3</sup> See WLWB Online Registry for [DPC - Waste Management Plan - Version 4.0 - Dec 22 22.pdf](#)

the revisions outlined in the attached Reasons for Decision and NTPC/DPC is to work with Board staff to determine a submission date. Alternatively, if NTPC/DPC is planning on submitting new versions of these plans with their forthcoming Water Licence Renewal Applications, the respective revisions can be incorporated into the new versions of the Plans (i.e., Version 9 of the EPP, Version 6 of the SCP, and Version 5 of the WMP). In either case, the revised Plans should be prepared in accordance with the Land and Water Board's *Document Submission Standards*.

The details of the Board's decision are set out in the attached Reasons for Decision.

Please direct questions or concerns regarding this letter to Ryan Fequet in writing.

Yours sincerely,



Mason Mantla  
Chair, Wek'èezhìi Land and Water Board

BCC'd to:       Wek'èezhìi Distribution List  
                  Meg McCluskie, GNWT-ECC  
                  Meaghan McIntyre-Newell, GNWT-ECC  
                  Clint Ambrose – Inspector, GNWT-ECC

Attached:       Reasons for Decision



Box 32, Wekweètì, NT X0E 1W0  
Tel: 867-713-2500 Fax: 867-713-2502

#1-4905 48<sup>th</sup> Street, Yellowknife, NT X1A 3S3  
Tel: 867-765-4592 Fax: 867-765-4593  
[www.wlwb.ca](http://www.wlwb.ca)

## Reasons for Decision

<b>Reference/File Number:</b>	N1L4-0150 (Type "A" Water Licence); W2014L4-0001 (Type "A" Water Licence); and W2021Q0011 (Type "A" Land Use Permit)
<b>Licensee:</b>	Northwest Territories Power Corporation (NTPC) and Dogrib Power Corporation (DPC)
<b>Subject:</b>	Emergency Preparedness Plan (EPP) Version 8.0, Spill Contingency Plan (SCP) Version 5.0, and Waste Management Plan (WMP) Version 4.0.

## Decision from the Wek'èezhì Land and Water Board Meeting of May 18, 2023

### 1.0 Decision

On May 18, 2023, the Wek'èezhì Land and Water Board (WLWB or the Board) considered the Emergency Preparedness Plan (EPP) Version 8.0,<sup>1</sup> Spill Contingency Plan (SCP) Version 5.0,<sup>2</sup> and Waste Management Plan (WMP)<sup>3</sup> Version 4.0 submitted by the Northwest Territories Power Corporation (NTPC). The EPP is required by Licence N1L4-0150, Part E, Condition 1, and Licence W2014L4-0001, Part E, Condition 4. The SCP is required by Licence N1L4-0150, Part E, Condition 3; Licence W2014L4-0001, Part E, Condition 4; and Permit W2021Q0011, Condition 46. The WMP is required by Licence W2014L4-0001, Part B, Condition 10, and Permit W2021Q0011, Condition 31. NTPC is the Licensee for NTPC N1L4-0150 and the Permittee for W2021Q0011; Dogrib Power Corporation (DPC) is the Licensee for W2014L4-0001, but NTPC operates the facility covered by this Licence. NTPC requested that Version 5.0 of the SCP and Version 4.0 of the WMP be applicable to both Water Licences and the Permit, and that Version 8 of the EPP be applicable to both Water Licences.

<sup>1</sup> See WLWB ([www.wlwb.ca](http://www.wlwb.ca)) Online Registry for [DPC - Emergency Preparedness Plan - Dec 2022 - Dec 22 22.pdf](#)

<sup>2</sup> See WLWB Online Registry for [DPC - Spill Contingency Plan - Version 5.0 - Dec 22 22.pdf](#)

<sup>3</sup> See WLWB Online Registry for [DPC - Waste Management Plan - Version 4.0 - Dec 22 22.pdf](#)

In consideration of the submissions, reviewer comments, and proponent responses, the Board has decided the following:

1. To approve Version 8.0 of the EPP, Version 5.0 of the SCP, and Version 4.0 of the WMP;
2. To require NTPC/DPC to submit:
  - i. Version 8.1 of the EPP. Version 8.1 of the EPP is to include EPP Revision #1;
  - ii. Version 5.1 of the SCP. Version 5.1 of the SCP is to include SCP Revisions #1 and 2; and
  - iii. Version 4.1 of the WMP. Version 4.1 of the WMP is to include WMP Revisions #1 to 5.

NTPC is to work with Board staff to determine a submission date. Alternatively, if NTPC is planning on submitting new versions of these plans with their Water Licence Renewal Applications, the respective revisions can be incorporated into the new versions of the Plans (i.e., Version 9 of the EPP, Version 6 of the SCP, and Version 5 of the WMP).

3. If NTPC is planning on submitting the required revisions to the SCP in a new version with the Water Licence Renewal Applications, then NTPC is required to submit a letter addressed to the Board and Inspector indicating that appropriate NTPC staff have been made aware that water contaminated with petroleum hydrocarbons will be disposed of by a registered receiver of hazardous waste (e.g., KBL).

## **2.0 Background**

Northwest Territories Power Corporation (NTPC) operates the Snare Hydroelectric Facility (the Facility) located on the Snare River, northwest of Yellowknife, NT. The Facility includes four hydroelectric generation stations: Snare Rapids, Snare Falls, Snare Cascades, and Snare Forks.

The Facility operates under two water Licences, N1L4-0150 and W2014L4- 0001 (the Licences), and one Land Use Permit (i.e., W2021Q0011). Water Licence W2014L4-0001 is issued to the Dogrib Power Corporation (DPC) for the Snare Cascades Power Generation Facilities;<sup>4</sup> however, NTPC operates the facility covered by this Licence. Water Licence N1L4-0150 and Land Use Permit W2021Q0011 are issued to NTPC and associated with the Snare Rapids, Snare Falls, and Snare River Power Generation Facilities.<sup>5,6</sup>

The Spill Contingency Plan (SCP) is required by Licence N1L4-0150, Part E, Condition 3; Licence W2014L4-0001, Part E, Condition 4; and Permit W2021Q0011, Condition 46. The Waste Management Plan (WMP) is required by Licence W2014L4-0001, Part B, Condition 10, and Permit W2021Q0011, Condition 31. The Emergency Preparedness Plan (EPP) is required by Licence N1L4-0150, Part E, Condition 1, and Licence W2014L4-0001, Part E, Condition 4. NTPC requested that Version 5.0 of the SCP and Version 4.0 of the

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<sup>4</sup> See WLWB Online Registry for [Dogrib Power Corporation - W2014L4-0001 | Wek'èezhii Land and Water Board \(wlwb.ca\)](#)

<sup>5</sup> See WLWB Online Registry for [Northwest Territories Power Corporation - N1L4-0150 | Wek'èezhii Land and Water Board \(wlwb.ca\)](#)

<sup>6</sup> See WLWB Online Registry for [Northwest Territories Power Corporation - W2021Q0011 | Wek'èezhii Land and Water Board \(wlwb.ca\)](#)

WMP be applicable to both Water Licences and the Permit, and that Version 8 of the EPP be applicable to both Water Licences.

The Plans were received by the Board in April 2022, but additional information was requested by Board staff. The updated Plans were received December 22, 2022. According to the cover letters, the Plans were updated during the annual review of the Plans, as required by the Licences. According to the revision history tables, only minor updates were made to the Plans, including adding conformance tables.

The Plans were distributed for review on March 3, 2023. Comments were received on April 6, 2023, from the Government of Northwest Territories – Environment and Natural Resources – Environmental Assessment and Monitoring (GNWT-ENR),<sup>7</sup> Environment and Climate Change Canada (ECCC), and the Tłıchǫ Government. Board staff also submitted clarification questions. Proponent responses were submitted by the deadline of April 13, 2023. Reviewer comments and recommendations, as well as the proponent’s responses, are available on the WLWB Online Review System (ORS).<sup>8</sup>

### **3.0 Reasons for Decision**

The Plans were reviewed for conformity to the Licences and all reviewer comments and proponent responses submitted during the public review period were reviewed. Based on the review, the Board has decided to approve the Plans.

- ***Decision # 1: The Board has approved Version 8.0 of the EPP, Version 5.0 of the SCP, and Version 4.0 of the WMP.***

The reasons for this decision are:

- The Board is of the opinion that none of the comments raised during the public review indicate that the Plans should not be approved;
- As discussed throughout these Reasons for Decision, the Board is of the opinion that issues raised during the public review have been addressed by NTPC’s responses or can be addressed in the next versions of the Plans; and
- The Water Licences will be undergoing a renewal this year and some of the issues can be further discussed during the renewal proceedings.

As discussed in sections below, there are some revisions that the Board is requiring be addressed in the next versions of the Plans. These revisions appear straightforward in nature and are more clarification/organizational edits that would not affect the waste management, spill contingencies, or emergency responses at the Site. Because the Water Licences will be undergoing renewal proceedings

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<sup>7</sup> The GNWT Departments of Lands, and Department of Environment and Natural Resources were amalgamated into the Department of Environment and Climate Change on April 1, 2023. For cohesion with the wording on the Online Review System (ORS), Government of the Northwest Territories – Environment and Natural Resources – Environmental Assessment and Monitoring (GNWT-ENR) is used throughout this Reasons for Decision.

<sup>8</sup> See WLWB Online Review System for [NTPC - Waste Management Plan v 4.0, Spill Contingency Plan v 5.0, and Emergency Preparedness Plan v 8.0](#)

this year, the Board recognizes that there may be other changes to the Plans that NTPC/DPC would like considered as part of the proceedings. Given the required edits from this review appear straightforward, the Board is giving NTPC/DPC two options with how to proceed with submitting the next versions of the Plans: either submit the Plans for conformity (i.e., Version 8.1 of the EPP, Version 5.1 of the SCP, and Version 4.1 of the WMP); or submit the new versions of the Plans (i.e., Version 9 of the EPP, Version 6 of the SCP, and Version 5 of the WMP) with the required revisions and any other updates NTPC/DPC would like considered as part of the Water Licence Renewal Applications.

➤ **Decision #2: NTPC/DPC is to submit:**

- a. Version 8.1 of the EPP. Version 8.1 of the EPP is to include EPP Revision #1;**
- b. Version 5.1 of the SCP. Version 5.1 of the SCP is to include SCP Revisions #1 and 2;  
and**
- c. Version 4.1 of the WMP. Version 4.1 of the WMP is to include WMP Revisions #1 to 5.**

***NTPC should work with Board staff to determine a submission date. Alternatively, if NTPC/DPC is planning on submitting new versions of these plans with their Water Licence Renewal Applications, the respective revisions can be incorporated into the new versions of the Plans (i.e., Version 9 of the EPP, Version 6 of the SCP, and Version 5 of the WMP).***

The following sections address comments/issues raised during the public review and the resulting revisions required for the next version of the various Plans. The last section (i.e., section 3.4) addresses commitments that NTPC made to include in updated versions of the Plans in its response to comments.

### **3.1 Emergency Preparedness Plan**

Comments raised during the public regarding the EPP were related to clarification questions that are addressed in section 3.4 of this Reasons for Decision.

### **3.2 Spill Contingency Plan**

In section 5.6.1 of the SCP, NTPC indicated that it would use a make-shift oil-water separator to hold any fuel retrieved from a water body due to a spill. Then, once the oil separated, NTPC would release the water portion back to the source, after confirming with a lab that there were no detectable petroleum hydrocarbons (PHCs).

GNWT-ENR commented that given this activity of releasing the potentially impacted water is not reflected in the Licences, and no effluent quality criteria (EQC) exists for the site, this would be considered an unauthorized discharge under the Licence (comment 8). GNWT-ENR recommended that NTPC update the wording to indicate that any water contaminated with petroleum hydrocarbons be collected and disposed of at a registered receiver of hazardous waste. NTPC committed to updating this section to indicate that “Water contaminated with petroleum hydrocarbons will be collected, transported, and disposed of by KBL Environmental Ltd.” (response to GNWT-ENR comment 8).

Given NTPC has committed to disposing of this mixture of water and fuel to a registered receiver of hazardous waste, the Board is of the opinion that NTPC's response addresses GNWT-ENR's concern and the Plan should be updated accordingly.

- ***SCP Revision #1: NTPC is to remove reference to discharging water recovered from spill cleanups in section 5.6 of the SCP and replace with wording that indicates the water will be disposed of by a registered receiver of hazardous waste (e.g., KBL).***

This particular revision should be reflected in the SCP as soon as possible given potential compliance issues with the Licence if this practice were to continue. If NTPC decides not to submit the SCP for conformity and submits a new version with the Water Licence Applications, then the Board requires NTPC to inform their staff (i.e., staff who would manage spills and handle wastes) that water contaminated with petroleum hydrocarbons will be disposed of by KBL. To ensure this takes place, a letter to the Board and the Inspector indicating that staff have been made aware of this change is required.

- ***Decision #3: If NTPC is planning on submitting the required revisions to the SCP in a new version with the Water Licence Renewal Applications, then NTPC is required to submit a letter addressed to the Board and Inspector indicating that appropriate NTPC staff have been made aware that water contaminated with petroleum hydrocarbons will be disposed of by a registered receiver of hazardous waste (e.g., KBL). This letter is to be submitted as soon as reasonably possible.***

NTPC is reminded that all Waste must be disposed of per the approved Waste Management Plan. In the future, as per Part E, Condition 5(c), "if any unauthorized discharge of waste occurs...the Licensee shall report each...unauthorized discharge to an Inspector within 24 hours". If NTPC requires the ability to discharge waste to water, then it should include this request in its forthcoming Water Licence Application. NTPC should consult the Board's Guide to the Water Licencing Process to determine what additional information it would need to include with the application.

### **3.3 Waste Management Plan**

#### **3.3.1 Geochemical Testing**

In section 1.4.5.2, NTPC indicated that it will complete geochemical testing for all quarries and/or borrow sources across Snare Hydro for the identification of Acid Rock Drainage (ARD) and Metal Leaching. NTPC indicated that this would be done in 2022, after the release of the GNWT's Quarry Sampling and Testing Guidance for the Identification of Acid Rock Drainage and Metal Leaching Potential. No data was provided with the WMP.

In response to comments from the public review, NTPC indicated that the Guidance from GNWT had not yet been released and committed to testing the materials once the guidance was finalized (response to WLWB staff comment 5; ECCC comment 1). ECCC recommended that any rock used for construction be tested to ensure it is non-acid generating (ECCC comment 1). ECCC also recommended that any excavated

materials not being used should be stockpiled in a way that drainage from the laydown area be managed to avoid any potential adverse environmental effects (ECCC comment 1). NTPC responded that its Land Use Operations and Maintenance Plan outlines various methods and techniques to ensure proper drainage is maintained at all laydowns, quarries and or borrow pits.<sup>9</sup> The Board notes that the Land Use Operations and Maintenance Plan is not for Board approval.

It is unknown to what extent construction is currently taking place at the site, and therefore whether there is any risk to the environment from quarried/borrow source rock. Given NTPC has committed to testing these materials in the future, and that additional information on this topic can be collected during the renewal proceedings, the Board is of the opinion that NTPC's responses have adequately addressed the comments/recommendations at this time. The Board requires the WMP be updated to indicate that once the Guidance from the GNWT has been finalized, NTPC will proceed with the geochemical testing requirements.

- ***WMP Revision #1: NTPC is to update section 1.4.5.2 of the WMP to indicate that geochemical testing will be carried out and considered as per GNWT's Quarry Sampling and Testing Guidance for the Identification of Acid Rock Drainage and Metal Leaching Potential when it is released.***

### **3.3.2 Incinerator**

In Version 5.0 of the WMP, NTPC indicated that non-hazardous solid waste materials are incinerated, which includes food waste, food packaging, paper, cardboard, and untreated wood. When inappropriate waste material is identified in the incinerator feed material, it is rejected and removed; removed inappropriate waste is stored and handled in accordance with NTP's Hazardous Waste Management Program.

GNWT-ENR recommended that the WMP clarify how inappropriate waste will be segregated, for example chlorinated plastics (comment 9). NTPC responded with quoting sections of the document that outlined the operator of the incinerator is responsible for identifying inappropriate wastes and removing them, where possible, or rejecting batches with intermixed inappropriate wastes, including any plastics. The Board is satisfied that NTPC demonstrated where in the document this is addressed.

Reviewers noted that one of the Appendices in Version 5.0 was missing: Operator's Manual for the Snare Hydro Incinerator (GNWT-ENR comment 10; and ECCC comment 2). GNWT-ENR and ECCC recommended that the manual be included in Appendix H and NTPC agreed. There is no Licence requirement that NTPC provide this manual, and no reviewers recommended that the WMP not be approved without reviewing this document. Given NTPC committed to including this manual and it could provide additional context for the WMP, the Board requires NTPC to provide the manual with the next version.

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<sup>9</sup> [NTPC - Permit - Operations and Maintenance Plan - Version 1.0 - Nov 13, 21](#)



- ***WMP Revision #2: NTPC is to include the Operator’s Manual for the Snare Hydro Incinerator in Appendix H of the next version of the WMP.***

Given the manual is likely a supporting document and the necessary waste management details related to the incinerator are likely already included in the WMP, the Board does not think that the addition of this manual will require the WMP to be distributed for public review. However, if any additional information is needed in the WMP after the manual is included, NTPC should make this clear in the cover letter as this may require the WMP be distributed for public review.

In section 2.2.2, NTPC indicated that all organics will be incinerated. GNWT-ENR commented that organics tend to have a relatively high moisture content, and asked NTPC to clarify if any pre-treatment methods like drying will be used prior to incineration (comment 11). GNWT-ENR also recommended that information on the use of any auxiliary fuel in the incinerator be provided. NTPC did not directly answer the question but replied that “Section 2.2.2 has been updated to include wording to refer to Appendix H [Operator’s Manual for the Snare Hydro Incinerator] for proper operation of incinerator”. Based on NTPC’s response, it is unclear what updates NTPC proposes to include in the next version. That being said, the Board is of the opinion that the requested information is for operational procedures rather than management procedures (i.e., how the incinerator will be operated versus how the waste will be managed) and are therefore satisfied with NTPC’s commitment to reference the Operator’s Manual.

### ***3.3.3 Northwest Territories Legislation/Guidelines***

In Appendix B of the WMP, NTPC included Table B2 which lists the various legislation and guidelines applicable to the NWT. GNWT-ENR commented that one of the guidelines in the Table was recently replaced, and that additional applicable regulatory requirements for solid waste management in NWT could be accessed from GNWT-ENR’s website (comment 16). GNWT-ENR did not specify if they identified any gaps in the WMP due to the change in the guideline or in relation to the additional regulatory requirements. NTPC agreed to revise B2 with GNWT-ENR’s request.

- ***WMP Revision #3: NTPC is to update the WMP, Appendix B, Table B2 with the updated GNWT Guideline for Hazardous Waste Management (2017), and any applicable requirements from Table 1.2 of GNWT’s Guidelines for the Planning, Design, Operation & Maintenance of Solid Waste Modified Landfill Sites in the Northwest Territories (2003).***

In the cover letter with the WMP, NTPC should indicate if any new information was added to the WMP due to these guidelines. This may require that the WMP be distributed for public review.

### ***3.3.4 Glossary***

A glossary is included in Appendix A in the WMP. GNWT-ENR commented that some of the defined terms were inconsistent with the definitions used in reference documents (comment 15). GNWT-ENR recommended updating the definition of “Landfilling” according to the Guidelines for the Planning, Design, Operation & Maintenance of Solid Waste Modified Landfill Sites in the Northwest Territories.

GNWT-ENR also recommended the terms “Manage” and “Treatment or Treat” not be limited to only Hazardous Waste, given both terms are used throughout the WMP for non-hazardous waste as well. GNWT-ENR also recommended that NTPC consider if “Solid Waste” was different from “Waste” and recommended the definition of “Waste” be revised since it seemed contradictory to what was in the WMP (i.e., not including inert waste). The Board is of the opinion that the definition of waste should be updated to be consistent with the *Waters Act*.<sup>10</sup> The Board’s Guidelines for Developing a Waste Management Plan may have some helpful language for the definitions as well.<sup>11</sup> As per GNWT-ENR’s recommendation, NTPC agreed to update the definitions accordingly. Given NTPC agreed to update the definitions, the Board requires NTPC to consider applicable GNWT and Board Guidelines, as well as the *Waters Act*, when updating the glossary.

- ***WMP Revision #4: NTPC is to update the glossary in Appendix A of the WMP in consideration of applicable GNWT and Board Guidelines, the Waters Act, and the suggestions provided in GNWT-ENR comment 15.***

It is not expected that changes to the glossary would result in substantial changes to the body of the WMP; however, if changes are made to the WMP in relation to the Glossary, NTPC should identify those changes in the cover letter with the WMP. This may require the WMP be distributed for public review.

### **3.4 Commitments**

In response to comments during the public review, NTPC acknowledged there were items within the Plans that should be revised and committed to updating these items in the next version. These commitments are detailed below:

- For all Plans (where applicable):
  - Update with the correct contact information from the Tłıchǵ Government (TG comment 1); and
  - Update references to “Hamlet of Behchoko” to “Behchokǵ” and “Tlıcho Lands Protection Department” to “Department of Culture and Lands Protection, Tłıchǵ Government” (TG comment 2).
- For the EPP:
  - Update section 1.2 to include the NWT Spill Report Line phone number (GNWT-ENR comment 2);
  - In section 1.2, update the name of “GNWT Emergency Measure Organization” to “GNWT Emergency Management Organization” (GNWT-ENR comment 3);
  - In sections 4.5.2 and 4.9.2, update the minimum and maximum water elevations for the Big Spruce Reservoir, Snare Falls Forebay, and Snare Forks Forebay, where appropriate,

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<sup>10</sup> <https://www.justice.gov.nt.ca/en/files/legislation/waters/waters.a.pdf>

<sup>11</sup> [MVLWB-Guidelines-for-Developing-a-Waste-Management-Plan-Mar-31\\_11-JCWG.pdf](#)

- to match the elevations required by the Licence (i.e., Part C, Conditions, 2(a), 3(a), and 4(a)) (WLWB staff comment 1);
- Update section 4.9.3 to remove “It is...necessary approximately every five years on average to apply to the Water Board for special exemption to cease Falls dam releases completely for one eight-hour period while debris is cleared from the tailrace with heavy equipment” given NTPC indicated this was no longer required (WLWB staff comment 2); and
  - Update section 4.9.5 (where appropriate) to remove reference to “minimum licensed outflows” and “licenced minimum release”, given outflow and release rates are not included in the Licence (WLWB staff comment 3).
- For the SCP:
    - Throughout the SCP, update sections (where appropriate) to indicate a Land Use Permit was issued in 2021 to consolidate NTPC’s former permits (WLWB staff comment 4);
    - Throughout the SCP, remove reference to the fax spill line and replace with email/phone number where appropriate (see GNWT-ENR comment 6);
    - Update section 2.2.5.4 to reference the corrected water usage per day per person at the temporary camps, as NTPC indicated in response to WLWB staff comment 6;
    - Correct spelling error in section 1.2 (i.e., “Protection” instead of “Projection”) (GNWT-ENR comment 5); and
    - Throughout the SCP, update the name of “GNWT Emergency Measure Organization” to “GNWT Emergency Management Organization” and the phone number (see GNWT-ENR comment 7).
  - For the WMP:
    - Throughout the WMP, update sections (where appropriate) to indicate a Land Use Permit was issued in 2021 to consolidate NTPC’s former permits (WLWB staff comment 4);
    - Throughout the WMP, update references from GNWT Department of Environment and Natural Resources (GNWT-ENR) to GNWT Department of Environment and Climate Change (GNWT-ECC), due to the department’s name change (GNWT-ENR comment 14);
    - Update section 1.4.5.4 to reference the correct approximate water usage per day per person at the temporary camps (i.e., 250 L/person/day) and the number of temporary camps (i.e., 9), as NTPC indicated in response to WLWB staff comments 6 and 7, respectively;
    - Update section 3.1 to indicate Life cycle management starts at “manufacturing or material extraction” as NTPC indicated in response to GNWT-ENR comment 12; and
    - In Appendix K, under the Waste Segregation Rules at Snare Hydro, NTPC committed to removing “organics” from the list of items that are permitted to be burned at the dump to align with GNWT’s guidelines (i.e., Municipal Solid Wastes Suitable for Open Burning) (in response to GNWT-ENR comment 17).

- ***EPP Revision #1; SCP Revision #2; and WMP Revision #5: NTPC is to incorporate the revisions in section 3.4 of these Reasons for Decision in the next versions of the EPP, SCP, and WMP.***

**Signed the 23<sup>rd</sup> day of May 2023, on behalf of the Wek'èezhìi Land and Water Board**



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Witness



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Mason Mantla  
Chair, Wek'èezhìi Land and Water Board