



Sahtu Land and Water Board
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June 8, 2018

[S04A-006](#) & [S04L1-006](#)

Ms. Jenica von Kuster
Environmental & Regulatory Specialist – NWT
Husky Oil Operations Ltd.
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Calgary, AB
T2P 3G7
Email:

Email: Jenica.vonKuster@huskyenergy.com

Dear Ms. von Kuster,

**Re: Sah Cho L-71 Site Reclamation Plan – Proposed Work Plan for 2018-2019
Board staff Confirmation of Notification to the Board and Stakeholders**

The Sahtu Land and Water Board (SLWB or the Board) received the [proposed Work Plan for 2018-2019](#) for the Sah Cho L-71 Wellsite from Husky Oil Operations Limited (Husky) on May 2, 2018. This submission also included the [2013-2015 Phytoremediation Validation Report for the Sah Cho L-71 Wellsite](#) (Report). In the Work Plan, Husky requested approval of its Plan; which includes closure of the L-71 phytoremediation pad, by June 10, 2018 to allow sufficient time for the Husky team to execute the proposed summer field activities.

Work Plan

The Work Plan is not a requirement of Licence S04L1-006 or Permit S04A-006; however, the Report describes remediation activities that have been ongoing since the last Annual Report (2012) received by the Board on September 20, 2013, as required by Part B, condition 2(j) of Licence S04L1-006. The Work Plan and Report were posted to the Online Review System on May 7, 2018 and reviewer comment and recommendations were requested by May 24, 2018. The Board received comment from the Government of Northwest Territories, Environment and Natural Resources that stated “ENR has reviewed the updated Work Plan for the Sah Cho L-71 site and notes that the Phytoremediation Validation Report supports the recommendation to close the phytoremediation pad by backfilling”. Board staff review also confirms that the Report supports the proposed Work Plan for 2018-2019, but note that Annual Report submissions are outstanding for 2013 to 2017.

Annual Summer Site Inspection

Board staff review of the Work Plan also noted site inspection(s) may be required in 2020 to ensure that vegetation is recovering and that there are no slumping or erosions issues with the reclaimed areas (pg. 3). To fulfill regulatory requirements the following conditions should be considered:

- According to Licence S04L1-006, Part E (Conditions Applying to Abandonment and Restoration), condition 2:

The Licensee shall monitor the project area affected by activities related to the issued Water Licence for a minimum of 5 years to ensure that mitigation, reseeded, erosion control and restoration efforts have been successful. These efforts shall be performed to the satisfaction of the Board and the Water Licence Inspector.

- According to Permit S04A-006, condition 15.1, the requirement for revegetating stripped areas are that:

The Permittee shall establish vegetation on all areas stripped of vegetation during this land use operation to a minimum of seventy (70%) per cent ground cover, unless otherwise authorized in writing by the Land Use Inspector.

Board staff also remind Husky to submit a written report documenting the Annual Summer Site Inspection as set out in Part B, condition 8 of Licence S04L1-006, which is to be submitted as part of the Annual Water Licence Report that is due not later than September 1.

Final Clearance

Board staff also want to take this opportunity to share the requirements for final clearance for Permit S04A-006. According to the *Mackenzie Valley Land Use Regulations (MVLUR)*, a Final Plan must be submitted which includes the information set out in Section 29 of the MVLUR, as follows:

- A map, normally at scale of 1:50,000, show the location, the area, and distances of all land use operations. If access routes were used, indicate width. Please refer to the Board's [Standard's for Geographic Information Systems \(GIS\) Submissions](#) for further requirements;
- A summary of the hectares utilized in each aspect of the land use operation; and
- A calculation of land use fees.

Once a Final Plan has been received and processed, which includes confirmation by an Inspector and recommendation for file closure, the SLWB will be able to issue a Letter of Clearance, thereby closing the Land Use Permit. There is currently not a formal process for closing a Water Licence, however, all reporting requirements cease upon confirmation by a Water Licence Inspector that the conditions of the Licence have been met.

This letter hereby confirms that the Board has received notification of the 2018-2019 Work Plans for the Sah Cho L-71 Wellsite with details of remediation activities from 2013 to 2015 and a copy of this letter has been filed on the Public Registry.

The ongoing full cooperation of Husky is anticipated and appreciated. If you have any questions or concerns, please contact me at (867) 598-2413 ext 224 or email sabrina.sturman@slwb.com.

Respectfully,



Sabrina Sturman
Regulatory Specialist

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