

Review Comment Table

Board:	SLWB
Review Item:	S13L1-006 Husky 2017-18 Annual Report and Summer Site Inspection Report
File(s):	S13L1-006
Proponent:	Husky Oil Operations Ltd.
Document(s):	2017-18 Annual Water Licence Report (123 kB) 2018 Summer Site Inspection Report (8.5 MB)
Item For Review Distributed On:	Nov 7 at 10:31 Distribution List
Reviewer Comments Due By:	Nov 27, 2018
Proponent Responses Due By:	Dec 4, 2018
Item Description:	<p>Husky Oil Operations Ltd. (Husky) has submitted its 2017-18 Annual Water Licence Report in accordance with Part B, condition 3 of Licence S13L1-006 and its 2018 Summer Site Inspection Report in accordance with Part B, condition 3i) and Part E, conditions 1-4 of Licence S13L1-006.</p> <p>Although formal Board approval is not required under the Licence, the Board must be satisfied that the Licensee has met the requirements of the Licence.</p> <p>Reviewers are invited to submit comments and recommendations by November 27, 2018.</p>
General Reviewer Information:	All documents that have been uploaded to this review are also available on our public registry. If you have any questions or comments about this review or the Online Review System, please contact Bonnie Bergsma at (867) 496-2778 or email bonnie.bergsma@slwb.com .
Contact Information:	Bonnie Bergsma

Comment Summary

Environment and Climate Change Canada: Junotta Wilson				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	General	Comment Environment and Climate Change Canada has received and reviewed		

		S13L1-006 Husky 2017-2018 Annual Report and Summer Site Inspection Report in accordance ECCC's mandate has no comments at this time. Recommendation n/a		
GNWT - ENR: Central Email GNWT				
ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
4	General File	Comment (doc) ENR Letter with Comments and Recommendations Recommendation		
1	Topic 1: Well Abandonment Work	Comment ENR understands that Husky has applied to renew Water Licence S13L1-006 to support activity on the Little Bear N-09 and Little Bear H-64 well locations which are currently both suspended and set for downhole abandonment in the winter 2018/19. As such, it is unclear how previous inspections and reclamation progress of the area will be considered in future should there be new disturbance of these areas. Recommendation 1) ENR requests clarification on how site reclamation progress will be considered in future inspections accounting for the use of site-wide services to support downhole abandonment work that has been proposed by Husky.		Husky has submitted a Closure and Reclamation Plan for all abandonment activities which was approved by the Board.
2	Topic 2: Security Site	Comment ENR notes that Husky has cleaned up litter along the GNWT winter road during the June inspection which was a result of winter road traffic between Tulita and Norman Wells unrelated		

		to Husky's activities. Recommendation 1) ENR commends Husky on additional clean-up activities conducted at the security site.		
3	Topic 3: Quarry Material	Comment ENR notes various comments, including related to the all-weather road, regarding rust-coloring as a result of oxidation of quarry material. Recommendation 1) ENR requests that Husky provide an update on any additional investigations related to potential impacts that may result from use of this material and how they are being addressed or mitigated, if applicable.		

Sahtu Renewable Resource Board: Colin Macdonald

ID	Topic	Reviewer Comment/Recommendation	Proponent Response	Board Staff Response
1	Annual Report	Comment The SRRB has reviewed the report and has no comment. There has been minimal activity at the sites. There has been no fresh water used, no waste produced, no new drilling, no discharges and no abandonment or restoration activity between May 1, 2017 and April 30, 2018. No data were generated in the SNP program. Recommendation None.		
2	Inspection Report	Comment This semi-annual inspection report of the EL494 wellsites and associated support sites indicates that conditions are good. Abandonment activities are expected in the winter of 2019. There is		

	<p>generally no erosion on the sites and revegetation is occurring. Most areas will be reclaimed in 2019.</p> <p>Recommendation None. No soil sampling has been reported in these site inspections so that the areas of hydrocarbon and metal contamination have not been characterized. If it has not been done previously, this sampling should be conducted at some point in the abandonment activities.</p>		
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November 27, 2018

Bonnie Bergsma
Regulatory Specialist
Sahtu Land and Water Board
Box 1,
Fort Good Hope, NT X0E 0H0

Dear Ms. Bergsma,

**Re: Husky Oil Operations
Water Licence – S13L1-006
2017-18 Annual Report and Summer Site Inspection
Request for Comment**

The Department of Environment and Natural Resources (ENR), Government of the Northwest Territories has reviewed the report at reference based on its mandated responsibilities under the *Environmental Protection Act*, the *Forest Management Act*, the *Forest Protection Act*, the *Species at Risk (NWT) Act*, the *Waters Act* and the *Wildlife Act* and provides the following comments and recommendations for the consideration of the Board.

Topic 1: Well Abandonment Work

Comment(s):

ENR understands that Husky has applied to renew Water Licence S13L1-006 to support activity on the Little Bear N-09 and Little Bear H-64 well locations which are currently both suspended and set for downhole abandonment in the winter 2018/19. As such, it is unclear how previous inspections and reclamation progress of the area will be considered in future should there be new disturbance of these areas.

Recommendation(s):

- 1) ENR requests clarification on how site reclamation progress will be considered in future inspections accounting for the use of site-wide services to support downhole abandonment work that has been proposed by Husky.

Topic 2: Security Site

Comment(s):

ENR notes that Husky has cleaned up litter along the GNWT winter road during the June inspection which was a result of winter road traffic between Tulita and Norman Wells unrelated to Husky's activities.

Recommendation(s):

- 1) ENR commends Husky on additional clean-up activities conducted at the security site.

Topic 3: Quarry Material

Comment(s):

ENR notes various comments, including related to the all-weather road, regarding rust-coloring as a result of oxidation of quarry material.

Recommendation(s):

- 1) ENR requests that Husky provide an update on any additional investigations related to potential impacts that may result from use of this material and how they are being addressed or mitigated, if applicable.

Comments and recommendations were provided by ENR technical experts in the Water Resources Division and the Sahtu Region and were coordinated and collated by the Environmental Assessment and Monitoring Section (EAM), Conservation, Assessment and Monitoring Division (CAM).

Should you have any questions or concerns, please do not hesitate to contact Patrick Clancy, Environmental Regulatory Analyst at (867) 767-9233 Ext: 53096 or email patrick.clancy@gov.nt.ca.

Sincerely,



Patrick Clancy
Environmental Regulatory Analyst
Environmental Assessment and Monitoring Section
Conservation, Assessment and Monitoring Division
Department of Environment and Natural Resources
Government of the Northwest Territories