



Sahtu Land and Water Board

P.O Box 1
Fort Good Hope, NT
X0E 0H0

Phone: 867-598-2413

Fax: 867-598-2325

www.slwb.com

June 19, 2020

S13L1-007

Christine Wickens,
Environment and Regulatory Advisor
Imperial Oil Resources N.W.T. Limited,
750 Mackenzie Drive, Bag 5000,
Norman Wells, NT, X0E 0V0

Sent by email

Dear Ms. Wickens,

**Re: Request for Temporary Modification to S13L1-007 – Board Approval
Withdrawal of Water from the Mackenzie River at an Alternate Intake Location**

The SLWB received your revised temporary modification request on May 8, 2020, to allow for the withdrawal of water from the Mackenzie River at a location (end of the Bulk Fuels unloading dock) that is not included in the approved list of water withdrawal locations under Licence S13L1-007. The purpose of the modification is to withdraw water in proximity to the Mainland Tank Farm in order to complete a hydrotest on a fuel storage tank (Tk104) following cleaning and repairs.

The Federal (CIRNAC) Inspector commented on [May 12, 2020](#) that since the Imperial Licence does not contain Effluent Quality Criteria (EQCs) for total metals to be tested in the discharge water, CIRNAC will compare the samples to the baseline of the Mackenzie River, the CCME for Freshwater Aquatic Life, and take into account the proposed EQC for metals derived from the Licence recommended by Board staff (S17L8-003). "If no parameters of concern are noted, then an approval to discharge will follow. If the water does contain high levels of a parameter, then we will work together to deal with the situation."

The Inspector also requested 24-hour notification of hydrotest sample results prior to discharge.

The Board has been made aware that Imperial will be submitting an **amendment application in 2020** that formally identifies alternative water intake locations for approval through the amendment process as directed by the Board's [decision letter issued July 30, 2019](#). However, since the amendment process has not yet started, and this repair work is required, **the Board will approve this stand-alone Modification request with the following conditions/mitigation measures to minimize any potential impact from this activity on the Mackenzie River:**

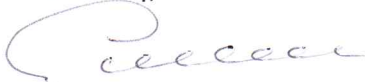
1. Prior to initiating the hydrotest, Imperial will provide the Inspector with an anticipated timeline for sampling and discharge;
2. An access point to the river will be chosen to minimize impact to shoreline vegetation;
3. Water will be withdrawn through a clean suction hose that is equipped with a fish screen;
4. Water samples will be collected at the intake location during initial, middle, and final filling;
5. Volumes of water withdrawn will be measured with a flowmeter and tank gauging and reported in the monthly water use reports submitted to the Board;

pg. 1

6. Water withdrawn at this location (estimated 6800 m³) will use about 0.2% of the total allowable annual water withdrawal limit, and will be below the daily maximum rate (16,000 m³/day) outlined in Licence S13L1-007;
7. Secondary containment will be placed under any fuel containing equipment (e.g. pumps) and vehicles will be staged away from the river;
8. Hydrotest activity will take place between July 16 and August 31, which is outside of the applicable Department of Fisheries and Oceans (DFO) restricted activity timing window (September 15 – July 15 for the NWT);
9. Upon completion of the hydrotest and prior to discharge, water samples will be taken from the bottom, middle and top portions of the tank to ensure water quality meets the following criteria:
 - a) Water quality in the tank will be compared to intake water quality (baseline of the Mackenzie River) to ensure no significant differences;
 - b) Water samples in the tank must meet effluent quality criteria outlined in Part E, conditions 15 (for total petroleum hydrocarbons, phenols, chloride) and 16 (pH) of [Imperial's Licence S13L1-007](#);
 - c) Water samples in the tank must be analyzed for total metals and the results compared to metals CCME Freshwater Aquatic Life Criteria (as per the discharge criteria approved for [Transport Canada Licence S17L8-003](#) Part E, condition 11); and
 - d) Water samples in the tank must be used to perform an Acute Lethality Test as per testing requirements in Licence S13L1-007, Annex A: SNP, Part C, condition 7.
10. Results of the water quality testing will be provided to the Inspector 24 hours prior to initiating discharge;
11. If no parameters of concern are noted, then an approval to discharge will be issued from the Inspector;
12. Discharge of hydrotest water to the Mackenzie River will occur at the end of the Bulk Fuels unloading dock at a rate not to exceed 5100 m³ /day;
13. Volumes discharged will be measured with an inline flowmeter and tank gauging and reported in the monthly water use report submitted to the Board;
14. Hydrotest water will be filtered and discharged through a clean hose in a controlled manner to prevent flooding and erosion;
15. If the discharge water contains high levels of any parameter (exceedance of criteria) a plan for dealing with the situation will be assessed by the Inspector, Imperial and the Board.

The continued cooperation of Imperial in meeting their regulatory requirements is anticipated. If you have any questions or concerns, please contact Bonnie Bergsma at (867) 496-2778 Or email bonnie.bergsma@slwb.com.

Sincerely,



Larry Wallace, Chair
Sahtu Land and Water Board

Copy (by email): Jody Crawford, Conventional Operations Superintendent
Tim Morton, CIRNAC inspector
Devin Penney, CIRNAC Inspector
Imperial Oil Distribution List