



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

July 30, 2019

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

Your e-mail: christine.a.wickens@exxonmobil.com

Dear Ms. Wickens,

**Re: Request for temporary modification to Water Licence S13L1-007
Withdrawal of water from the Mackenzie River at an Alternative Location (Bear Island)**

The SLWB received your temporary modification request to Water Licence S13L1-007 on July 2, 2019 to allow for the withdrawal of water from the Mackenzie River at a location (Bear Island) not currently listed under the Water Licence.

It has been noted that, water withdrawal will occur through a clean suction hose equipped with a fish screen. The total volume used will not exceed the total allowable quantity, under the annual water withdrawal limit discussed within Water Licence S13L1-007. All volumes will be tracked and reported on the Annual Water Use Report, to be submitted on March 31. The duration of this temporary modification will last through August 2020 or until the work has been completed, whichever comes first. The water withdrawn from this alternative location, will be used for kill fluid and cement mixing during abandonment activities (abandonment for nine wells at the Bear Island Terminal location). The work is estimated to begin in August 2019 and extend through Spring 2020.

Part G describes the conditions applying to Modifications: Condition 1 a) is: *"details of this proposed Modification were provided to the Board at least 60 days prior to the commencement of the Modification"*; Condition 1b) is: *"the Modification does not place the Licensee in contravention of either the Licence, that Act, or Federal, Territorial or Municipal Legislation"*; and Condition 2) is: *"Modification(s) for which all of the conditions referred to in Part G: Item 1, have not been met, can be carried out only with written approval from the Board."*

S13L1-007 – Imperial Oil Resources NWT Limited – Modification - Water withdrawal from alternative location –
July 30_19

The SLWB has been informed that the GNWT-ENR have no concerns with the proposed project and the Federal Resource Management Officer responded that, *"The Inspector has reviewed the request and has no concerns with the proposed temporary modification. It is expected that all best practices are used by the Licencee including but not limited to, placing a screen to prevent fish capture, ensuring that this modification does not place the Licencee in violation with their authorized water withdrawal rate, and fuel management near the Mackenzie River. The Inspector also recommends that the water licence S13L1-007 be modified to include this withdrawal point as a permanent authorized location as this is not the first time this request has been made."*

The Board has acknowledged the questions raised by Norman Wells Renewable Resources Council (NWRRC) regarding a) specific location of water withdrawal, b) methodology of water intake and c) amount of water required from the specified location. The three questions were answered to the satisfaction of the Board as well as NWRRC.

Please note as per Part G Condition 3, the Licensee shall provide as-built plans and drawing of the Modification(s) referred to in this Licence within 90 days of completion of the Modification(s).

The proposed modification to the Water withdrawal is consistent with the terms of the Licence S13L1-007 and the Board finds no reason not to approve the proposal as described in the July 2, 2019 submission. The SLWB approves the completion of this work between August 2019 and August 2020.

The proposed modification to the temporary water withdrawal location is consistent with the terms of the Licence S13L1-007 and the Board hereby approves the temporary modification request as described in the July 2, 2019 submission from now until August 31, 2020.

In the future, the Board directs Imperial to apply for an amendment to the Water Licence to formally identify alternative water intake locations rather than seeking approval through the modification process.

Sincerely,



Larry Wallace
Chair, Sahtu Land and Water Board

Copy:
Imperial Oil Distribution List
Tim Morton, CIRNAC Water Inspector
Jody Crawford, Conventional Operations Superintendent, Imperial