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April 30, 2020

Paul Dixon  
Sahtu Land and Water Board  
Executive Director  
P.O. Box 1  
Fort Good Hope, NT  
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**Re:**

**2020 SNP Groundwater and AEMP Surface Water modification request in response to COVID-19  
Type A Water Licence S13L1-007  
Imperial Oil Resources N.W.T. Limited (Imperial)**

Dear Mr. Dixon,

Imperial is submitting this request to modify its Type A Water Licence S13L1-007 SNP Groundwater and AEMP Surface Water sampling requirements in 2020, due to the risk associated with executing this work during the COVID-19 pandemic. Currently, Imperial samples SNP Groundwater wells twice per year (as required by S13L1-007, Annex A, Part G), and completes AEMP Surface Water sampling three times per year (as required by S13L1-007 Part I and outlined in AEMP Version 1.0). Sampling is completed by a third party contractor (Advisian).

Imperial is requesting approval from the SLWB to reduce the SNP Groundwater sampling frequency to once per year in 2020 (down from twice per year), and reduce the AEMP Surface Water sampling frequency to twice per year in 2020 (down from three times per year).

This revised sampling frequency will limit the need for Advisian to mobilize to site in the near term, resulting in an overall reduction in risk to the health and safety of the Imperial workforce and the community (associated with personnel mobilization to site). With this revised sampling frequency, it is expected that Advisian would not need to mobilize to Norman Wells until August (versus June, as currently scheduled).

In addition to weighing the risks associated with the COVID-19 pandemic, Imperial has evaluated the environmental risk associated with the proposed reduced sampling frequency to ensure that this change will not result in increased environmental risk. Historical data collected as part of the SNP Groundwater and AEMP Surface Water programs generally show stable concentrations of measured parameters, with current results (for indicator parameters such as chloride and hydrocarbons) all below applicable regulatory criteria (as summarized in the table below), Imperial is confident that the proposed reduced 2020 SNP Groundwater and AEMP Surface Water sampling scope will not result in increased environmental risk.

S13L1-007 SNP Groundwater Program - Results Summary	S13L1-007 AEMP Surface Water Sampling - Results Summary
<ul style="list-style-type: none"> <li>• Data has been collected twice per year since 2015 (about 10 data points per well).</li> <li>• All monitoring wells have historically been less than applicable <b>CCME chloride criteria</b> with the exception of one well (TF 03-12-3), which has been below chloride criteria since September 2018.</li> <li>• All monitoring wells have historically been less than applicable <b>CCME hydrocarbon criteria</b> (the majority of the wells show non-detectable hydrocarbon concentrations).</li> </ul>	<ul style="list-style-type: none"> <li>• Data has been collected three times per year since 2017 (5 to 10 data points per sampling location).</li> <li>• All sampling events have shown <b>non-detectable concentrations of hydrocarbon parameters</b>.</li> <li>• Data analysis (as presented in the 2019 SLWB Annual Water Use Report) showed no impact from the Norman Wells Operation on the water quality in the Mackenzie River.</li> </ul>

Imperial will continue to assess the risks associated with the COVID-19 pandemic and evaluate whether work can proceed as required by S13L1-007 or whether further reduction in sampling may be requested later in the year. However, at this time Imperial is requesting approval for reduced sampling frequency described above in order to minimize consultant mobilization to Norman Wells in the short term.

To allow for planning for these 2020 field programs, Imperial is requesting a response from the SLWB no later than May 31, 2020.

If you require further information, please contact Christine Wickens at 587-476-5007 or [christine.a.wickens@exxonmobil.com](mailto:christine.a.wickens@exxonmobil.com).

Sincerely,



Christine Wickens  
Environment and Regulatory Advisor  
Imperial