



Sahtu Land and Water Board

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May 25, 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 Modification of SNP Groundwater and AEMP Surface Water sampling in response to COVID-19

The SLWB received your request (dated April 30, 2020) 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 the work during the COVID-19 pandemic. Currently, a third-party contractor from Alberta (Advisian), conducts the sampling required by the Licence. Imperial has requested that the sampling events scheduled in June be suspended to minimize consultant mobilization to Norman Wells in the short term. However; Imperial may also request further reduction in sampling later in the year based on the risks associated with COVID-19.

The SLWB has reviewed the NWT Public Health Orders for:

- COVID-19 Travel Restrictions and Self-Isolation Protocol (amended April 27, 2020);
- COVID-19 Directed at Mineral and Petroleum Industry (April 10, 2020); and
- GNWT Emerging Wisely plan for re-opening (updated May 12, 2020).

The Public Health Orders issued in mid-April provide for travel exceptions and clear guidance and protocols for transient workers in the mineral and petroleum resources industry working in the NWT. In the Emerging Wisely plan, the final public health measures will not be lifted until a vaccine has been approved and produced or an effective treatment has been approved and becomes readily accessible. The timeline for this has been estimated to be between 12-18 months. Final public health measures include lifting the travel prohibition and restriction measures for non-residents.

Given that the travel prohibitions for non-residents will remain in place indefinitely and given that compliance with the conditions of the Water Licence, including monitoring, is still required even in the midst of a global pandemic, the SLWB will not approve the request to modify sampling requirements due to COVID-19. Imperial has the option to either follow the protocols outlined in the Public Health Order for transient workers, or to hire a third-party contractor based in the NWT who is qualified to conduct the required sampling.

The SLWB appreciates the concerns raised regarding the risk to health and safety of NWT residents due to COVID-19. The continued cooperation of Imperial in meeting their regulatory requirements is anticipated. If you have any questions or concerns, please contact me or Bonnie Bergsma.

Sincerely,

Paul Dixon, Executive Director

Copy (by email): Jody Crawford, Conventional Operations Superintendent
Tim Morton, CIRNAC inspector