

**SUMMARY OF BOARD DECISIONS / DIRECTIONS (BDD) FOLLOWING MINISTER APPROVAL OF IMPERIAL NORMAN WELLS OPERATION S13L1-007 LICENCE RENEWAL ON MARCH 5, 2015 AND PROPOSED LICENCE CONDITION AMENDMENTS WITH RATIONALE**

Item No.	Date (month/day/year)	Decision/Direction Topic	Summary of Decision / Direction	Relevant Condition in Current Licence	Rationale for Proposed Amended Condition
1	06/29/2015	Engagement Plan	<b>APPROVED</b> • Include opportunities for other Local Businesses	Part B, c 11	To update to new Standard Water Licence Condition Template (SWLCT) for administrative efficiency and clarity.
2	07/28/2015	WMF Modification – Soil Washing Facility <sup>1</sup>	<b>APPROVED</b> • Provide As-built plans	Part G - remove	The Board no longer processes Modifications as per the new SWLCT.
3a	12/21/2015	Management Plans <sup>2</sup>	<b>APPROVED</b> • Special Effects Study	Schedule 6, c 1	Schedule not amended but added a condition in Part I to require SES as it has not yet been completed.
3b			• Environmental Protection Plan	Part E, c 6	To update to new SWLCT for administrative efficiency and clarity.

<sup>1</sup> S13L1-007 – [Soil washing modification approval letter](#) – Jul 28\_15

<sup>2</sup> S13L1-007 – [Board Approval of Management Plans](#) – Dec 21\_2015

3c			<ul style="list-style-type: none"> <li>• Waste Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Part E, c 8</li> </ul>	To update to new SWLCT for administrative efficiency and clarity.
3d			<ul style="list-style-type: none"> <li>• Groundwater Management Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Part E, c 4, Schedule 4</li> </ul>	To update to new SWLCT for administrative efficiency and clarity.  No changes to Schedule 4.
3e			<ul style="list-style-type: none"> <li>• Flowline Integrity Plan</li> </ul>	<ul style="list-style-type: none"> <li>• Part F, c 5, 6, Schedule 5</li> </ul>	To update to new SWLCT for administrative efficiency and clarity.  No change to Schedule 5.
3f			<ul style="list-style-type: none"> <li>• QAQC Plan with minor revisions</li> </ul>	<ul style="list-style-type: none"> <li>• Annex A, c B3</li> </ul>	To update to new SWLCT for administrative efficiency and clarity.  To add a condition in Part F requiring submission of this Manual.
4	01/08/2016	Modification – Depth of Cover Repairs <sup>3</sup>	<p><b>APPROVED</b> with conditions</p> <ul style="list-style-type: none"> <li>• Include summary of repair activities in 2018 Annual Flowline Integrity and Breakup Report</li> </ul>	<ul style="list-style-type: none"> <li>Part F, c 3</li> <li>Part G - remove</li> </ul>	To clarify that the annual inspection of flowlines is a Bathymetric Survey.  The Board no longer processes

<sup>3</sup> S13L1-007 – [Depth of Cover Repairs Modification Approval Letter](#) – Jan 18\_16

			<ul style="list-style-type: none"> <li>• contact Inspector 2 weeks prior to commence</li> <li>• submit as-built plan and drawings</li> </ul>		<p>Modifications as per the new SWLCT.</p> <p>To include the conditions of the modification in Part F: Operation and Maintenance of Structures and Facilities to avoid the need for future stand-alone amendments and greater flexibility for Imperial.</p>
5	09/07/2016	Licence Condition Interpretation <sup>4</sup>	<ul style="list-style-type: none"> <li>• No analysis for chlorine required if the chlorine injection system is out of service</li> </ul>	Annex A, Part C, c 4	Added this clarification to the condition.
6	01/05/2017	ICRP Version 1.0 <sup>5</sup>	<p><b>APPROVED</b> with additional studies/clarifications:</p> <ol style="list-style-type: none"> <li>1. General clarifications</li> <li>2. Reclamation Research</li> <li>3. Additional studies for detailed CRP</li> </ol>	Part J, c 1	<p>Added the additional requirements in the Board's Issuance Letter to a Schedule.</p> <p>Required for the Amendment as it is in Part J.</p>
7	01/05/2017	AEMP Version 1.0 <sup>6</sup>	<p><b>APPROVED for 18 months</b> with a revised AEMP to be submitted within 1 year addressing 14 recommendations</p>	Part I, c 1, Schedule 6	Added the requirement for the Special Effects Study into Licence as a condition (see item #22 and #23 for rationale).

<sup>4</sup> S13L1-007 – [Licence Condition Interpretation](#) – Board Approval – Sep 7\_16

<sup>5</sup> S13L1-007 – [ICRP Issuance Letter](#) – Jan 5\_17

<sup>6</sup> S13L1-007 – [Imperial Oil AEMP Issuance](#) – Jan 5\_17

					<p>Updated conditions for AMEP to SWLCT to address regulatory compliance issues (see item #23).</p> <p>As of today's date, a revised final AEMP Design Plan has yet to be approved.</p>
8	08/01/2017	AEMP Deferral Request <sup>7</sup>	<p><b>APPROVED</b> request to begin AEMP monitoring during 2018 open water season</p> <p><b>NOT APPROVED</b> request for a year extension to complete AEMP version 2.0</p>	Not Applicable	
9	10/30/2017	QA/QC Manual <sup>8</sup>	<p><b>NOT APPROVED</b></p> <ul style="list-style-type: none"> <li>• Update to 1996 QAQC Guidelines</li> <li>• Submit to an Analyst for approval</li> <li>• Submit revised QAQC Manual in 90 days</li> </ul>	<ul style="list-style-type: none"> <li>• Annex A, c B3</li> </ul>	<p>See Response to item #3f.</p> <p>Adding the requirement for a QA/QC Manual in the general Licence.</p>
10	12/05/2017	AEMP extension request <sup>9</sup>	<b>APPROVED</b> two-month deferral for submission of	Not Applicable	

<sup>7</sup> S13L1-007 – [AEMP deferral request issuance letter](#) – Aug 1\_17

<sup>8</sup> S13L1-007 – [QAQC Plan not approved](#) – Oct 30\_17

<sup>9</sup> S13L1-007 – [IORL – AEMP Extension request approval](#) – Dec 5\_17

			AEMP v. 2.0 by March 5, 2018		
11	03/26/2018	QA/QC Manual <sup>10</sup>	<b>APPROVED</b>	Annex A, c B3	See Response to item #3f.  Adding the requirement for a QA/QC Manual in the general Licence.
12	05/28/2018	AEMP Version 2.0 <sup>11</sup>	<b>NOT APPROVED</b> <ul style="list-style-type: none"> <li>• Resubmit AEMP with aquatic component (Slimy Sculpin and Loche) and increased water quality sampling from 3x to 6x per year.</li> <li>• Include tissue analysis for hydrocarbons</li> <li>• Identify sufficient sampling locations at Bear and Goose Islands</li> <li>• Set Low Action Levels below the upper end of natural variability</li> </ul>	Part I, c 1	See Response to item #7.  Addition of AEMP SWLCT to address need for setting Action Levels and to develop and implement a Response Plan for Action Level Exceedances.
13	05/28/2018	Modification – Water Withdrawal from an Alternate Location <sup>12</sup>	<b>APPROVED</b> with conditions <ul style="list-style-type: none"> <li>• Use of fish screens</li> <li>• Track and report water volumes</li> <li>• Inject used water into F-31X well</li> </ul>	Part G - remove	The Board no longer processes Modifications as per the new SWLCT.  To include conditions of the modification in the Licence

<sup>10</sup> S13L1-007 – [QAQC Manual Approval](#) – Mar 26\_18

<sup>11</sup> S13L1-007 – [Board Decision Letter for AEMP version 2.0](#) – May 28\_18

<sup>12</sup> S13L1-007 – [Modification Water Intake Approval](#) – May 28\_18

					Part D: Water Use to avoid the need for future stand-alone amendments and greater flexibility for Imperial.
14	11/19/2018	AEMP - Munkittrick <sup>13</sup>	<b>APPROVED</b> with conditions • Review must include ALL evidence on registry	Not Applicable	
15	07/30/2019	Modification – Water Withdrawal from an Alternate Location <sup>14</sup>	<b>APPROVED</b> with conditions • Use of fish screens • Track and report water volumes  <b>DIRECTED</b> to seek an amendment to the Licence to formally identify alternative water withdrawal locations	Part G - remove	See response to item #13.  New conditions for the use and approval of temporary water intake locations have been added to Part D: Water Use and amended Definition of <b>Water Intake</b> to avoid the need for future stand-alone amendments and greater flexibility for Imperial.
16	08/04/2019	AEMP Third Party Review <sup>15</sup>	<b>ACCEPTED</b> recommendations of the review and agrees with the timeline and approach for revisions to the AEMP and resubmission by Q3.	Not Applicable	

<sup>13</sup> S13L1-007 – [Board Decision Letter for Munkittrick to review AEMP](#) – Nov 19\_18

<sup>14</sup> S13L1-007 – [Modification – Approval for Water Withdrawal from Alternative Location](#) – July 30\_19

<sup>15</sup> S13L1-007 – [AEMP – Letter of Direction – Third Party Review](#) – Sep 4\_19

17	11/15/2019	Annual Closure and Reclamation Progress Report <sup>16</sup>	<b>ACCEPTED</b> and reminded Imperial of commitments made to include additional information in subsequent Annual Reports	Part J, c 4, Schedule 7	No changes except to Schedule 7, c 1a) wording changed from “summary of any closure and reclamation work...” to “summary of any Progressive Reclamation work...”  Required for the Amendment as it is in Part J.
18	05/25/2020	Request for Reduced SNP Groundwater and AEMP Surface Water Monitoring due to COVID <sup>17</sup>	<b>NOT APPROVED</b>	Not Applicable	
19	06/19/2020	Modification – Temporary Water Withdrawal Location <sup>18</sup> for completing a hydrostatic test on waters used to clean a hydrocarbon storage tank	<b>APPROVED</b> as a stand-alone until Amendment with conditions <ul style="list-style-type: none"> <li>• Contact Inspector</li> <li>• Use fish screen</li> <li>• Minimize shoreline disruption</li> <li>• Collection of water samples</li> <li>• Measure and report volumes of water taken</li> </ul>	Part G - remove	The Board no longer processes Modifications as per the new SWLCT.  Added relevant conditions of the Modification to Part F: Operation and Maintenance of Structures and Facilities.  Added relevant conditions of

<sup>16</sup> S13L1-007 – [Letter of Direction from SLWB for 2018 C and R Progress Report](#) – Nov 15\_19

<sup>17</sup> S13L1-007 – [SLWB response to 2020 Monitoring Modification Request](#) – May 25\_20

<sup>18</sup> S13L1-007 – [Board Approval for Modification](#) – Jun 19\_20

			<ul style="list-style-type: none"> <li>• Employ secondary containment of vehicles parked near water</li> <li>• Hydrotest to be completed outside DFO restricted activity timing for fish</li> <li>• Water samples to be tested for EQC (Part E, c 15, 16) and metals following CCME Freshwater Aquatic Life Criteria and Acute Lethality Test (Annex A, Part C, c 7)</li> <li>• Test results to be provided to Inspector</li> <li>• Controlled discharge (volume, rate, erosion control filters)</li> </ul>		<p>the Modification to Part E: Waste and Water Management.</p> <p>Updated Part E, c 14 for the release of hydrostatic test fluids to reflect these conditions and EQC.</p> <p>Adding these conditions will avoid the need for future stand-alone amendments and greater flexibility for Imperial.</p>
20	12/23/2020	Modification - Dredging <sup>19</sup>	<p><b>APPROVED</b> with conditions</p> <ul style="list-style-type: none"> <li>• Implement all mitigation measures</li> <li>• 48-hour notification to Inspectors</li> <li>• Provide as-built plans and drawings (Part G, c 3)</li> <li>• Report activities in Annual WL Report</li> </ul> <p><b>DIRECTED</b> to add operations and maintenance dredging</p>	Part G - remove	<p>The Board no longer processes Modifications as per the new SWLCT.</p> <p>Added relevant conditions of the Modification to Part F: Operation and Maintenance of Structures and Facilities to avoid the need for future stand-alone amendments and greater flexibility for Imperial.</p>

<sup>19</sup> S13L1-007 – Board Approval – [Modification – Dredging](#) – Dec 23\_20



			activities to the amendment application under Part F		
21	08/03/2021	ICRP <sup>20</sup>	<b>DIRECTED</b> to submit an updated ICRP by March 4, 2022	Part J, c 2	Adding conditions from the SWLCT would ensure regulatory compliance and reflect the Board's direction to more timely updates.  Required for the Amendment as it is in Part J.
22	08/23/2021	AEMP version 3.0 - Direction <sup>21</sup>	<b>NOT APPROVED</b> • Requested a response to HESL 2021 TR within 90 days plus a timeline for resubmission and response to 8 shortcomings	Part I, c 1	See response to item #7.  Updated conditions for AMEP to SWLCT to address regulatory compliance issues.
23	02/10/2022	AEMP – Board Direction in Response to Imperial response <sup>22</sup>	<b>DIRECTED</b> to submit final AEMP by year end 2022	Part I, c 1, Schedule 6	See response to item #7.  No change to the requirement or conditions for the Special Effects Study but added it as a new Licence condition under Part I with details in the Schedule unchanged.

<sup>20</sup> S13L1-007 – [Board Direction for Imperial Closure and Reclamation Plan](#) – Aug 3\_21

<sup>21</sup> S13L1-007 – [Board Direction for Imperial AEMP](#) – Sep 23\_21

<sup>22</sup> S13L1-007 – [SLWB Letter to Imperial re IORL Dec 16 2021 AEMP Response Letter](#) - Feb 10\_22

					<p>Included details of the requirement for an AEMP Annual Report in AEMP Schedule as per SWLCT. Imperial submitted the first 3-year AEMP Report with the Annual Water Licence Report.</p>
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