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February 25, 2022

Chris Moger
Suncor Energy Inc.
P.O. Box 2844, 150 – 6th Avenue S.W.
Calgary, Alberta T2P 3E3

sent by e-mail

Dear Chris Moger,

Re: Suncor Energy Inc. – Land Use Permit Application and Water Licence Application Incomplete – Tweed Lake M-47, Tweed Lake A-67 & Bele O-35 Abandonment and Reclamation Program – Coville Lake, NT

On February 14, 2022, the Sahtu Land and Water Board (Board) staff received the Application for Land Use Permit (Permit) and Water Licence (Licence) File for TweedLake M-47, Tweed Lake A-67 & Bele O-35 Abandonment and Reclamation Program from Suncor Energy Inc. (Suncor).

The Permit Application has been reviewed and found to be lacking information required under section 19 and paragraph 22(1)(a) of the Mackenzie Valley Land Use Regulations (MVLUR). For the Application to be considered complete, refer to the MVLWB *Guide to the Land Use Permitting Process*² (Guide) and submit the information outlined in the following table to the Board's office.

Upon receipt of this information, the Application will be reviewed as per the *Mackenzie Valley Resource Management Act*. Please advise Board staff, within 90 days of the date of this letter, of the expected date for the submission of this additional information.

The Water Licence Application has also been reviewed and found to be lacking information required as outlined in the Guide to the Water Licensing Process.

For both applications, we can confirm correct fees have been calculated. You may now forward the two cheques to the Board, and/or submit proof that the fees have been sent.

Please contact Marie Nietfeld at (825) 439-8591 or Bonnie Bergsma at (519) 289-3380 with any questions, clarifications or concerns regarding this letter.

Yours sincerely,

A handwritten signature in cursive script that reads "Marie Nietfeld".

Marie Nietfeld, M.Sc.
Regulatory Specialist

Copied to: Margot Ferguson – Consultant to Suncor Energy Inc.
Trevor Bremner – GNWT-Lands Sahtu Region
Jeff Walker - GNWT-ENR Sahtu Region
Rick Walbourne - GNWT-ENR, Yellowknife

Attachments: Table 1: Additional Information Required for Permit Application
Table 2: Additional Information Required for Licence Application

Table 1: Land Use Permit Application Additional Information Required

Item on Application Form	Topic	Additional Information Required
2.	Name and Contact Information – Applicant’s Head Office	In addition to the operating licence documents submitted with the Application, please also provide a copy of the current NWT Certificate of Registration.
7.	Permit Type and Criteria	Board staff note the Application Package describes the use of fuel storage containers that are larger than 4,000 L. Please confirm with sections 4 and 5 of the MVLUR and revise the form to add 4(a) iii as a trigger.
9.	Camp	<p>Board staff note that Appendix 2 Figure 3 describes the main camp as being under the authority of the Colville Lake Community. Please confirm if there is an access and benefit agreement with the community for the camp use (may reduce the closure cost estimate (security). Otherwise, section 9 of the Guide, requires that details of proposed camps sites are to be provided, including:</p> <ul style="list-style-type: none"> • Size and layouts; • Location and distance from any waterbody; • Number and type of structures; • Square footage of structure and number of personnel stationed in the camp; • Name and type (e.g. lake, river) of water source(s); • Purpose and quantity of water to be used (rates, volumes (m³/day). <p>The Board may include a condition in the draft Permit to submit a final camp plan prior to commencement of the winter abandonment activity.</p>
11.	Proposed Waste Management Methods: Sewage	<p>Board staff have identified inconsistencies in Application documents for sewage disposal methods (Attachment C, Page 9 and Table 5-1). Suncor have identified that this WMP version 1.0 is intended to be updated prior to the project commencement, including confirmation and approval from local waste facilities to accept waste, preferred options for waste disposal and contingencies.</p> <p>A condition will be included in the draft permit requiring the submission of an updated WMP 90 days prior to commencement of the winter abandonment project.</p>
	Off-site disposal	<p>A condition will be included in the draft permit for submitting written confirmation (e.g., an email, letter, etc.) from the facility/facilities indicating they will accept the waste prior to the commencement of abandonment activities.</p>

	Overburden	On the Application Form, insert 'Not Applicable' or provide detailed information about salvaging, storing, and reuse of any overburden and organic materials, if applicable.
12.	Equipment	The list of equipment needs to include the equipment weight (in tonnes). These are necessary for the closure cost estimate and to verify permitting criteria.
15.	Spill Contingency Plan/Information	<p>Suncor submitted a corporate Emergency Response Plan that covers all Suncor Projects for drilling, completions, and logistics and a Site Specific Emergency Response Plan (SSERP) for the Colville Lake Project. The former plan contains more detail than is required by the INAC Guidelines for Spill Contingency Planning, is not site specific to the Colville Lake Project, and is not a Plan that the Board would distribute for public review. The SSERP does not contain enough information to be useful in the event of a spill, and is missing key elements from the INAC Guidelines</p> <p>Please update and resubmit the Site Specific Spill Contingency Plan by including relevant portions of section 6.0 of the corporate ERP in the site specific plan and ensure the updated plan addresses and includes the following components:</p> <ul style="list-style-type: none"> • Introduction, including project and site description; • Site map with locations of potential spill materials and spill response resources and equipment; • Description of all potential spill types, sources, sizes, and potential effects; • Description of worst-case scenario for the site; and • Action plan(s) (for all spill types or for different spill categories), with procedures for: <ul style="list-style-type: none"> i. initial action, ii. reporting and updates, iii. containing and cleaning up the spill, iv. managing spill-related wastes, and v. restoring affected areas and completing clean-up; • Spill response resource inventory; • Description of training programs; and • Description of how the plan will be reviewed and revised.
16.	Proposed Time Schedule	Correct an error in the time schedule provided on page 3 of the Site Specific Emergency Response Plan (Duration: Dec 10 th , 2022 to March 31 st , 2022).

18.	Closure and Reclamation Plan	<p>Appendix 1 EPP, Section 5.2.3 describes the proposed reclamation activities for the sites and engagement process to help develop the plan, noting that reclamation will adhere to requirements in permit conditions. The Board’s new standard permit conditions generally do not include specific reclamation requirements for projects. Rather, the Board prefers that remediation, closure and reclamation plans be developed by the applicant and presented in a stand-alone Closure and Reclamation Plan (CRP) for Board approval. Board staff advises Suncor to refer to section 2.2 of the MVLWB/AANDC Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories for general direction on items to be included in a stand-alone CRP for the Project.</p> <p>For an example of a similar SLWB authorization for well abandonment and restoration activities that required a C&R Plan based on the MVLWB Guidelines, please follow this link (Husky S13A-002).</p> <p>Elements of a CRP include:</p> <ul style="list-style-type: none"> • Closure objectives for individual project components (e.g. sumps, wellbores, pads, access roads, etc.) and overall; • Closure criteria; • Descriptions of closure activities and closure options ; • Contingency plans; • Detailed closure and reclamation schedule for activities identified in 5.2.3, and what each activity will entail; • Reference to pre-reclamation photographs; • Post-closure monitoring and maintenance programs; and • Reference to record of engagement for closure and reclamation. <p>The CRP may be submitted as an Interim CRP with conditions in the draft permit that will require submission of a final CRP following Suncor’s proposed consultation with stakeholders and following completion of the abandonment program.</p>
	Closure Cost Estimate	<p>Board staff note that the Closure Cost Estimate has been prepared using the Land Use Permit Security Worksheet (2004 under revision). GNWT-ENR will request Suncor to prepare an estimate using the RECLAIM Model for Oil and Gas, and User Manual because this Application is for both a Permit and a Licence. The Board will consider a modified approach provided it includes missing cost items from RECLAIM, updated unit rates, and rationale. The Closure Cost Estimate is to be broken down into water- and land-related activities and liabilities so that appropriate security can be allocated to each of the two authorizations.</p>

20.	Fees	The Application Cover Letter indicated that fees would be forwarded to the Board. Board staff confirm the permit fee of \$150.00 made out to the Receiver General of Canada is correct and this cheque may now be forwarded to the Board.
General		Ensure all Figures, Tables, and Photographs are titled, labeled and referred to in the application documents.

Table 2: Water Licence Application Additional Information Required

Item on Application Form	Topic	Additional Information Required
7.	Proposed Quantity of Water Involved	<p>In the Water Licence Application Form, Suncor has provided a table of site-specific water sources, and refer to Appendix 2, Figure 3 for information about volumes, etc. The Table in Figure 3 is complete; however, we request the estimated water use volumes per source be added to the Table in the Application, and reference Figure 3 for additional information.</p> <p>Include fish bearing status of each water source if known.</p> <p>Include other users of the water sources if known.</p>
8.	Waste Management Plan	Refer to Table 1, item 11 for Board staff comments on the Waste Management Plan.
10.	Spill Contingency Plan	The Application Form indicates to include a Spill Contingency Plan. Refer to Board staff comments regarding the Spill Contingency Plan for the Land Use Permit Application (see Table 1, item 15).
14.	Additional Supporting Information	Refer to Table 1, item 18 for Board staff comments on Closure and Reclamation and Closure Cost Estimate.
15.	Fees	<p>The Application Cover Letter indicated that fees would be forwarded to the Board. Board staff confirm the licence application fee of \$30.00 made out to the Receiver General of Canada is correct and this cheque may now be forwarded to the Board.</p> <p>The Water Licence will set out a condition for annual water fees of \$432.50 in advance of using the water.</p>