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www.slwb.com

June 14, 2024

File: S24L3-001

Chuk Coulter, Manager
Great Bear Lake Lodge Ltd.
950 Bradford St.
Winnipeg, MB R3H 0N5

Sent by email

Dear Chuk Coulter,

Re: Great Bear Lake Lodge – Renewal Issuance Package – Water Licence S24L3-001 – Outfitting Camp – Domestic Activities – Dease Arm, Great Bear Lake, NT

The Sahtu Land and Water Board (Board) met on June 3, 2024 and considered the renewal Application Package from Great Bear Lake Lodge Ltd. (GBLL) for Water Licence S19L3-001 for the Great Bear Lake Lodge, Dease Arm, Great Bear Lake, NT in accordance with the *Waters Act*.

The Board has approved Water Licence (Licence) S24L3-001 (attached) for a term of ten years, effective June 14, 2024 and expiring June 13, 2034. The Licence is supported by the Board's Reasons for Decision. These documents are posted to the Board's Public Registry.¹

Submission Requirements

Please refer to Attachment A of the Licence for a complete summary and timetable of submissions required for this Licence. The Board's decisions on submissions that were considered in conjunction with the renewal Application Package are set out below.

¹ See SLWB Online Registry www.slwb.com for [Great Bear Lake Lodge Ltd. S24L3-001](#)

Management Plans – Revisions Required

The Board requires that the following Plans be revised to include all changes detailed in the Reasons for Decision and submitted by the dates outlined in the following table. The revised Plans will be considered approved when the Licensee receives written confirmation of conformity from Board staff. Until the revised Plans are approved, the Licensee must comply with the Waste Management Plan V3.0, Spill Contingency Plan V4.1, Engagement Plan and Log V1.0, Closure and Reclamation Plan V4.0, as approved under Licence S19L3-001.

Condition Number and Title	Title of Plan (Version)	Version and Date Revision Due
Part B, Condition 20, ENGAGEMENT PLAN – REVISED	Engagement Plan (V1.0) ²	V2.0 December 1, 2024
Part F, Condition 3, WASTE MANAGEMENT PLAN – REVISED	Waste Management Plan (V3.0) ³	V4.0 December 1, 2024
Part H, Condition 2, SPILL CONTINGENCY PLAN – REVISED	Spill Contingency Plan (V4.1) ⁴	V5.0 September 14, 2024
Part I, Condition 1, CLOSURE AND RECLAMATION PLAN – REVISED	Closure and Reclamation Plan (V4.0) ⁵	V5.0 December 1, 2024

Inspectors

The Inspectors referred to in the Licence can be contacted at the regional GNWT-ECC offices.⁶

Analyst

The Analyst referred to in the Surveillance Network Program in Schedule 1 of the Licence can be contacted at the Taiga Environmental Laboratory.⁷

Licence Processes and Additional Information

Sections 5 and 6 of the Land and Water Board (LWB) *Guide to the Water Licensing Process*⁸ (Guide) contain detailed information on licence enforcement and potential post-issuance processes, such as amendments to conditions, and assignment to another company. Please be familiar with these sections of the Guide and reach out to Board staff with any questions about LWB processes related to the Licence.

² See SLWB Online Registry for [Engagement Plan V1.0](#)

³ See SLWB Online Registry for [Waste Management Plan V3.0](#)

⁴ See SLWB Online Registry for [Spill Contingency Plan V4.1](#)

⁵ See SLWB Online Registry for [Closure and Reclamation Plan V4.0](#)

⁶ See GNWT-ECC Regional Offices webpage (<https://www.ecc.gov.nt.ca/en/regional-offices>) for regional contact information.

⁷ See GNWT-ECC Taiga Environmental Laboratory webpage (<https://www.ecc.gov.nt.ca/en/services/taiga-environmental-laboratory>) for contact information.

⁸ See SLWB Policies and Guidelines webpage for LWB [Guide to the Water Licensing Process](#).

Full cooperation of Great Bear Lake Lodge Ltd. is anticipated and appreciated. Please contact Natalie Lipka via [email](#) or phone number (780) 237-3571 with any questions or concerns regarding this letter.

Yours sincerely,



Valerie Gordon
Chair, Sahtú Land and Water Board

BCC'd to: SLWB – Déłı nę District
Erin Goose – Water Resource Officer, GNWT-ECC
Rick Walbourne – Director, Regulatory and Permitting, GNWT-ECC

Attached: Water Licence S24L3-001
Reasons for Decision



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Great Bear Lake Lodge Limited

Water Licence S24L3-001

Pursuant to the *Waters Act* and the Waters Regulations,
the Sahtu Land and Water Board grants this Water Licence to:

Great Bear Lake Lodge Limited

(Licensee)

of 950 Bradford St., Winnipeg MB, R3H 0N5

(Mailing Address)

hereinafter called the Licensee, to proceed with the following undertaking, subject to the annexed definitions and conditions contained therein:

Location:	Great Bear Lake Lodge
Water Management Area:	Great Bear Lake
Purpose:	Municipal; Outfitting Camp – domestic activities
Type:	Type B
Quantity of Water not to be exceeded:	Up to 2440m ³ per year
Effective Date:	June 14, 2024
Expiry Date:	June 13, 2034

Valerie Gordon, Chair
Sahtu Land and Water Board

Natalie Lippa, Witness

Type B Water Licence S24L3-001
Great Bear Lake Lodge Ltd. – Domestic Activities, Outfitting Camp

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Part A: Scope and Defined Terms

Scope:	Condition Title
1. This Licence entitles the Licensee to use Water and deposit Waste for municipal undertakings activities at Great Bear Lake Lodge, located along Dease Arm of Great Bear Lake, Northwest Territories.	SCOPE
The scope of this Licence includes the following:	
a) Withdrawal of Water for domestic activities; b) Deposit of Waste to the Solid Waste Disposal Facilities; c) Deposit of Waste to the Sewage Disposal Facilities; d) Construction, operation and maintenance of the Solid Waste Disposal Facilities; e) Construction, operation and maintenance of the Sewage Disposal Facilities; f) Construction, operation and maintenance of the Water Withdrawal Facilities; and g) Progressive Reclamation and associated Closure and Reclamation activities.	
2. The scope of the Project is as described in the Preliminary Screening Determination for S12L3-002, dated June 3, 2024.	SCOPE – PRELIMINARY SCREENING
3. This Licence is issued subject to the conditions contained herein with respect to the use of Water and the deposit of Waste in any Waters or in any place under any conditions where such Waste or any other Waste that results from the deposits of such Waste may enter any Waters. Any change made to the <i>Waters Act</i> and/or Waters Regulations that affects licence conditions and defined terms will be deemed to have amended this Licence.	LEGISLATION SUBJECT TO CHANGE
4. Compliance with this Licence does not relieve the Licensee from responsibility for compliance with the requirements of any applicable federal, territorial, or municipal legislation.	LEGISLATIVE COMPLIANCE

Defined Terms:¹

Analyst – an Analyst designated by the Minister under subsection 65(1) of the *Waters Act*.

Board – the Mackenzie Valley Land and Water Board established under subsection 99(1) of the *Mackenzie Valley Resource Management Act*.

Closure Cost Estimate - an estimate of the cost to close and reclaim the Project.

Closure and Reclamation – the process and activities that facilitate the return of areas affected by the Project to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment and human activities.

Closure and Reclamation Plan (CRP) – a document, developed in accordance with this Licence, that clearly describes the Closure and Reclamation for the Project.

Construction – any activities undertaken during any phase of the Project to construct, build, upgrade, or replace any structures, facilities, or components of, or associated with, the Project.

Discharge – a direct or indirect deposit or release of any Water or Waste to the Receiving Environment.

Effluent – a Wastewater Discharge.

Engagement Plan – a document, developed in accordance with the MVLWB *Engagement and Consultation Policy* and the *Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits*, that clearly describes how, when, and which engagement activities will occur with an affected party during the life of the Project.

Greywater – all liquid Waste from showers, baths, sinks, kitchens, and domestic washing facilities, but does not include Toilet Waste.

Inspector – an Inspector designated by the Minister under subsection 65(1) of the *Waters Act*.

Licensee – the holder of this Licence.

Minister – the Minister of the Government of the Northwest Territories (GNWT) – Environment and Natural Resources.

Ordinary High-Water Mark – the usual or average level to which a Watercourse rises at its highest point and remains for sufficient time so as to change the characteristics of the land. In flowing Watercourses (rivers, streams), this refers to an active channel/bank-full level, which is often the 1:2-year flood flow return level. In inland lakes,

¹ Defined terms are capitalized throughout the License, including when used in other definitions.

Defined Terms:¹

wetlands or marine environments, it refers to those parts of the Watercourse bed and banks that are frequently flooded by Water so as to leave a mark on the land and where the natural vegetation changes from predominantly aquatic vegetation to terrestrial vegetation (excepting Water tolerant species). For reservoirs, this refers to normal high operating levels (full supply level).

Progressive Reclamation – Closure and Reclamation activities conducted during the operating phase of the Project.

Project – the undertaking described in Part A, Conditions 1 and 2.

Receiving Environment – the natural environment that, directly or indirectly, receives any deposit of Waste from the Project.

RECLAIM – the Government of the Northwest Territories' model for estimating Closure and Reclamation costs.

Runoff – the overland flow of Water or Wastewater that occurs when precipitation, meltwater, or other Water is not absorbed by the land.

Seepage – any Water or Waste that drains, passes through, or escapes from any structure designed to contain, withhold, divert, or retain Water or Waste.

Sewage – all Toilet Wastes and Greywater.

Sewage Disposal Facilities – the area(s) and structures designated to contain and treat Sewage.

Solid Waste Disposal Facilities – the area(s) and structures designated to contain solid Waste.

Spill Contingency Plan (SCP) – a document developed for the Project in accordance with INAC's *Guidelines for Spill Contingency Planning*.

Surveillance Network Program (SNP) – a monitoring program required by this Licence and detailed in Annex A.

Toilet Wastes – all human excreta and associated products, not including Greywater.

Traditional Knowledge – the cumulative, collective body of knowledge, experience and values built up by a group of people through generations of living in close contact with nature. It builds upon the historic experiences of a people and adapts to social, economic, environmental, spiritual, and political change.

Unauthorized Discharge – a Discharge of any Water or Waste not authorized under this Licence

Defined Terms:¹

Waste – as defined in section 1 of the *Waters Act*:

- a) a substance that, if added to water, would degrade or alter or form part of a process of degradation or alteration of the quality of the water to an extent that is detrimental to its use by people or by an animal, fish or plant, or
- b) water that contains a substance in such a quantity or concentration, or that has been so treated, processed or changed, by heat or other means, that it would, if added to other water, degrade or alter or form part of a process of degradation or alteration of the quality of that water to the extent described in paragraph (a), and includes
- c) a substance or water that, for the purposes of the *Canada Water Act*, is deemed to be waste,
- d) a substance or class of substances prescribed by regulations made under subparagraph 63(1)(b)(i),
- e) water that contains a substance or class of substances in a quantity or concentration that is equal to or greater than a quantity or concentration prescribed in respect of that substance or class of substances by regulations made under subparagraph 63(1)(b)(ii), and
- f) water that has been subjected to a treatment, process or change prescribed by regulations made under subparagraph 63(1)(b)(iii).

Waste Disposal Facilities – the area(s) and structures designated for the disposal of Waste, including, but not limited to, the Sewage Disposal Facilities and Solid Waste Disposal Facilities.

Waste Management Plan (WMP) – a document, developed in accordance with the MVLWB *Guidelines for Developing a Waste Management Plan*, that describes the methods of Waste management for the Project from Waste generation to final disposal.

Wastewater – any Water that is generated by Project activities or originates on-site, and which contains Waste, and may include, but is not limited to, Runoff, Seepage, Sewage, Minewater, and Effluent.

Water – as defined in section 1 of the *Waters Act*: water under the administration and control of the Commissioner, whether in a liquid or frozen state, on or below the surface of land.

Watercourse – as defined in section 1 of the Waters Regulations: a natural watercourse, body of Water or Water supply, whether usually containing Water or not, and includes Groundwater, springs, swamps, and gulches.

Water Management Area – a geographical area of the Northwest Territories established by section 2 and Schedule A of the Waters Regulations.

Waters Regulations – the regulations proclaimed pursuant to section 63 of the *Waters Act*.

Water Supply Facilities – the area(s) and structures designed to collect and supply Water for the Project.

Water Use – as defined in section 1 of the *Waters Act*: a direct or indirect use of any kind, including, but not limited to,

- a) a diversion or obstruction of waters,

Defined Terms:¹

- b) an alteration of the flow of waters, and
- c) an alteration of the bed or banks of a river, stream, lake or other body of water, whether or not the body of water is seasonal, but does not include a use connected with shipping activities that are governed by the *Canada Shipping Act, 2001*.

Part B: General Conditions

Condition	Condition Title
1. The Licensee shall ensure a copy of this Licence is maintained on site at all times.	COPY OF LICENCE
2. The Licensee shall take every reasonable precaution to protect the environment.	PRECAUTION TO PROTECT ENVIRONMENT
3. In conducting its activities under this Licence, the Licensee shall make every reasonable effort to consider and incorporate any scientific information and Traditional Knowledge that is made available to the Licensee.	INCORPORATE SCIENTIFIC INFORMATION AND TRADITIONAL KNOWLEDGE
4. In each submission required by this Licence or by any directive from the Board, the Licensee shall identify all recommendations based on Traditional Knowledge received, describe how the recommendations were incorporated into the submission, and provide justification for any recommendation not adopted.	IDENTIFY TRADITIONAL KNOWLEDGE
5. All references to policies, guidelines, codes of practice, statutes, regulations, or other authorities shall be read as a reference to the most recent versions, unless otherwise noted.	REFERENCES
6. The Licensee shall ensure all submissions to the Board: a) Are in accordance with the LWB <i>Document Submission Standards</i> and, if applicable, <i>Geospatial Data Submissions Standards</i> ; and b) Include any additional information requested by the Board	SUBMISSION FORMAT
7. The Licensee shall ensure management plans are submitted to the Board in a format consistent with the MVLWB <i>Standard Outline for Management Plans</i> , unless otherwise specified.	MANAGEMENT PLAN FORMAT
8. The Licensee shall comply with all plans, programs, manuals, and studies, including revisions, approved pursuant to the conditions of this Licence.	COMPLY WITH SUBMISSIONS AND REVISIONS
9. The Licensee shall conduct an annual review of all plans, programs, manuals and studies, and make any revisions necessary to reflect changes in operations, contact information, or other details. No later than December 1 each year, the Licensee shall send a notification letter to the Board, listing the documents that have been reviewed and do not require revisions.	ANNUAL REVIEW

10.	The Licensee may propose changes at any time by submitting revised plans, programs, manuals or studies, that require Board approval to the Board, for approval, a minimum of 90 days prior to the proposed implementation date for the changes. The Licensee shall not implement the changes until approved by the Board.	REVISIONS
11.	The Licensee shall revise any submission and submit it as per the Board's directive.	REVISE AND SUBMIT
12.	If any date for any submission falls on a weekend or holiday, the Licensee may submit the item on the following business day.	SUBMISSION DATE
13.	The Licensee shall comply with the Schedules , which form part of this Licence, and any updates to the Schedules as may be made by the Board.	COMPLY WITH SCHEDULE(S)
14.	The Licensee shall comply with the Surveillance Network Program , set out in Schedule 1, and any updates to the Surveillance Network Program as may be made by the Board.	COMPLY WITH SURVEILLANCE NETWORK PROGRAM
15.	The Schedules and any compliance dates specified in this Licence may be updated at the discretion of the Board.	UPDATES TO SCHEDULES AND COMPLIANCE DATE(S)
16.	The Licensee shall comply with all directives issued by the Board in respect of the implementation of the conditions of this Licence.	COMPLY WITH BOARD DIRECTIVES
17.	The Licensee shall ensure signs are posted for all active Surveillance Network Program stations. All sign(s) shall be located and maintained to the satisfaction of an Inspector.	POST SURVEILLANCE NETWORK PROGRAM SIGN(S)
18.	The Licensee shall install, operate, and maintain meters, devices, or other such methods for measuring the volumes of Water used and Waste discharged to the satisfaction of an Inspector.	MEASURE WATER USE AND WASTE DISCHARGED
19.	Beginning December 1, 2024 and no later than every December 1 thereafter, the Licensee shall submit an Annual Water Licence Report to the Board and an Inspector. The Report shall be in accordance with the requirements of Schedule 2, Condition 1.	ANNUAL WATER LICENCE REPORT
20.	By December 1, 2024 the Licensee shall submit to the Board, for approval, a revised Engagement Plan .	ENGAGEMENT PLAN - REVISED
21.	A minimum of ten days prior to re-commencement of Project activities following a temporary shut-down period, the Licensee shall provide written notification to the Board and an Inspector. Notification shall include the commencement date,	NOTIFICATION – RE-COMMENCEMENT

and the name and contact information for the individual responsible for overseeing the Project. Written notification shall be provided to the Board and an Inspector if any changes occur.

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| 22. | The Licensee shall immediately provide written notification to the Board and an Inspector of any non-compliance with the conditions of this Licence. | NOTIFICATION – NON-COMPLIANCE WITH CONDITIONS |
| 23. | The Licensee shall immediately provide written notification to the Board of any non-compliance with a Board directive issued in respect of the implementation of the conditions of this Licence. | NOTIFICATION – NON-COMPLIANCE WITH DIRECTIVES |
| 24. | The Licensee shall ensure that a copy of any written authorization issued to the Licensee by an Inspector is provided to the Board. | COPY – WRITTEN AUTHORIZATION |

Part C: Security

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| 1. | The Licensee shall post and maintain a security deposit with the Minister in accordance with Schedule 3. The Licensee shall not commence activities until the security deposit has been accepted by the Minister. | POST SECURITY DEPOSIT |
| 2. | Upon request of the Board, the Licensee shall submit an updated Closure Cost Estimate using the current version of RECLAIM or another method acceptable to the Board. | UPDATE CLOSURE COST ESTIMATE |
| 3. | The amount of the security deposit required by Part C, Condition 1 (POST SECURITY DEPOSIT) may be adjusted by the Board: <ul style="list-style-type: none"> a) Based on an updated Closure Cost Estimate as per Part C, Condition 2 (UPDATE CLOSURE COST ESTIMATE); or b) Based on such other information as may become available to the Board. | ADJUSTED SECURITY AMOUNT |
| 4. | If the amount of the security deposit is adjusted by the Board as per Part C, Condition 3 (ADJUSTED SECURITY AMOUNT), the Licensee shall post the adjusted amount with the Minister within the timeframe set by the Board. The Licensee shall not commence any new activities associated with a security adjustment until the additional security deposit has been accepted by the Minister. | POST ADJUSTED SECURITY AMOUNT |
| 5. | Unless otherwise approved by the Board, the Licensee may not submit security adjustment requests except with any of the following submissions: <ul style="list-style-type: none"> a) Closure and Reclamation Plans; b) Closure and Reclamation Completion Reports; or c) Performance Assessment Reports. | SECURITY ADJUSTMENT REQUESTS |

Part D: Water Use

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| 1. | The Licensee shall only obtain Water for the Project from Great Bear Lake. The Licensee may withdraw up to 2440m ³ /year of Water from this source. | WATER SOURCE AND
MAXIMUM VOLUME |
| 2. | The Licensee shall only withdraw Water using the Water Supply Facilities, unless otherwise authorized temporarily in writing by an Inspector. | WATER WITHDRAWAL –
FACILITIES |
| 3. | Prior to withdrawing Water from an approved Water source, the Licensee shall post sign(s) to identify the intake for the Water Supply Facilities. All sign(s) shall be located and maintained to the satisfaction of an Inspector. | POST WATER INTAKE
SIGN(S) |
| 4. | The Licensee shall construct and maintain the Water intake(s) with a screen designed to prevent impingement or entrapment of fish. The screen shall be in accordance with the best practices outlined in Fisheries and Oceans Canada’s <i>Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater</i> and <i>Fish Screen Design Criteria for Flood and Water Truck Pumps</i> . | WATER INTAKE SCREEN |

Part E: Construction

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| 1. | The Licensee shall ensure that all structures intended to contain, withhold, divert, or retain Water or Waste are designed, constructed, and maintained to minimize the escape of Waste to the Receiving Environment. | OBJECTIVE –
CONSTRUCTION |
| 2. | The Licensee shall only use material that is clean and free of contaminants and has been authorized in writing by an Inspector. | CONSTRUCTION
MATERIAL – SOURCE(S) |
| 3. | Unless otherwise authorized in writing by an Inspector, a minimum of 90 days prior to the commencement of Construction of all structures, excluding Engineered Structures, intended to contain, withhold, divert, or retain Water or Wastes, the Licensee shall submit to the Board, for approval, a Structure Description and Construction Plan . The Plan shall be in accordance with the requirements of Schedule 4, Condition 1. The Licensee shall not commence Construction of the structure(s) prior to Board approval of the Plan. | STRUCTURE
DESCRIPTION AND
CONSTRUCTION PLAN |
| 4. | A minimum of ten days prior to the commencement of Construction of any structure(s) intended to contain, withhold, divert, or retain Water or Wastes, the Licensee shall provide written notification to the Board and an Inspector. Notification shall include the Construction commencement date, and the name and contact information for the individual responsible for overseeing the Construction. Written notification shall be provided to the Board and an Inspector if any changes occur. | NOTIFICATION –
CONSTRUCTION |

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| 5. | The Licensee shall ensure that all structures intended to contain, withhold, divert, or retain Water or Wastes, excluding Engineered Structures, are constructed in accordance with the approved Structure Description and Construction Plan(s) . | CONSTRUCT AS
DESIGNED –
STRUCTURE(S) |
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Part F: Waste and Water Management

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| 1. | The Licensee shall manage Waste and Water with the objective of minimizing the impacts of the Project on the quantity and quality of Water in the Receiving Environment through the use of appropriate mitigation measures, monitoring, and follow-up actions. | OBJECTIVE – WASTE AND
WATER MANAGEMENT |
| 2. | The Licensee shall minimize erosion by implementing suitable erosion control measures that shall be located and maintained to the satisfaction of an Inspector. | EROSION CONTROL |

Management and Monitoring Plans

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| 3. | By December 1, 2024, the Licensee shall submit to the Board, for approval, a revised Waste Management Plan . | WASTE MANAGEMENT
PLAN - REVISED |
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Operation of Structures and Facilities

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| 4. | The Licensee shall operate and maintain the Waste Disposal Facilities to prevent structural failure and to the satisfaction of an Inspector. | PREVENT STRUCTURAL
FAILURE |
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Discharge and Disposal Locations and Rates

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| 5. | A minimum of ten days prior to disposing of any Waste into a licenced municipal facility for the calendar year, the Licensee shall provide written notification to the Board and an Inspector. | NOTIFICATION – WASTE
DISPOSAL |
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Part G: Aquatic Effects Monitoring

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Part H: Spill Contingency Planning

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| 1. | The Licensee shall ensure that Unauthorized Discharges associated with the Project do not enter any Water. | OBJECTIVE – PREVENT
WASTE INTO WATER |
| 2. | Within 90 days following the effective date of this Licence, the Licensee shall submit to the Board, for approval, a revised Spill Contingency Plan . | SPILL CONTINGENCY
PLAN - REVISED |
| 3. | If a spill or an Unauthorized Release occurs or is foreseeable, the Licensee shall: | REPORT SPILLS |

- a) Implement the approved **Spill Contingency Plan** referred to in Part H, Condition 2;
 - b) Report it immediately using the NU-NT Spill Report Form by one of the following methods:
 - Telephone: (867) 920-8130
 - E-mail: spills@gov.nt.ca
 - Online: Spill Reporting and Tracking Database
 - c) Notify the Board and an Inspector immediately; and
 - d) Within 30 days of initially reporting the incident, or within a timeframe authorized by an Inspector, submit a detailed report to the Board and an Inspector, including descriptions of causes, response actions, and any changes to procedures to prevent similar occurrences in the future. Written notification shall be provided to the Board and an Inspector if any changes occur.
4. The Licensee shall ensure that spill prevention infrastructure and spill response equipment is in place prior to commencement of the Project. **SPILL PREVENTION AND RESPONSE EQUIPMENT**
 5. The Licensee shall restore all areas affected by spills and Unauthorized Discharges to the satisfaction of an Inspector. **CLEAN UP SPILLS**
 6. The Licensee shall not establish any fuel storage facilities or refueling stations, or store chemicals or Wastes within 30 metres of the Ordinary High-Water Mark of any Watercourse, except in accordance with the approved Spill Contingency Plan. **MATERIAL STORAGE – ORDINARY HIGH-WATER MARK**

Part I: Closure and Reclamation

1. By December 1, 2024, the Licensee shall submit to the Board, for approval, a revised **Closure and Reclamation Plan**. The Plan shall be in accordance with the requirements of Schedule 5, Condition 1. The Licensee shall not commence activities described in the Plan prior to Board approval of the Plan. **CLOSURE AND RECLAMATION PLAN - REVISED**
2. Six months prior to the closure and reclamation of the Project, the Licensee shall submit to the Board, for approval, a final **Closure and Reclamation Plan**. The Plan shall be in accordance with the requirements of Schedule 5, Condition 1. **CLOSURE AND RECLAMATION PLAN - FINAL**
3. The Licensee shall endeavor to carry out approved Progressive Reclamation as soon as is reasonably practicable. **PROGRESSIVE RECLAMATION**
4. The Licensee shall not conduct Progressive Reclamation except as approved by the Board. **PROGRESSIVE RECLAMATION – CARRY OUT AS APPROVED**

5. Beginning May 1, 2022 and no later than every May 1 thereafter, the Licensee shall provide written notification to the Board and an Inspector of any approved Progressive Reclamation that will be conducted in the upcoming year. Notification shall include the name and contact information for the individual responsible for overseeing the Progressive Reclamation. Written notification shall be provided to the Board and an Inspector if any changes occur.

**PROGRESSIVE
RECLAMATION –
NOTIFICATION**

6. Within 90 days of completing Closure and Reclamation of the Project, the Licensee shall submit to the Board a **Closure and Reclamation Completion Report**. The Report shall be in accordance with the MVLWB/AANDC *Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories*.

**CLOSURE AND
RECLAMATION
COMPLETION REPORT**

Schedule 1: Surveillance Network Program (SNP)

Water Licence S24L3-001, Part B, Condition 14; Great Bear Lake Lodge Ltd.

Table of Contents:

Part A: Reporting Requirements

Part B: Sampling and Analysis Requirements

Part C: SNP Station Descriptions and Monitoring Requirements

Part A: Reporting Requirements

1. The effective date of this Surveillance Network Program (SNP) is June 14, 2024.
2. The Licensee shall include all of the data and information required in Part C of this Schedule in the Annual Water Licence Report, as specified in Part B, Condition 19 of this Licence.
3. The Licensee shall also provide SNP data at other times, if requested by an Inspector or the Board.

Part B: Sampling and Analysis Requirements

1. More frequent sample collection or provision of data may be required at the request of an Inspector.
2. The location of sampling stations is subject to the approval of an Inspector.
3. All sample collection, sample preservation, and analyses shall be conducted in accordance with methods prescribed in the current edition of the American Public Health Association's (APHA) *Standard Methods for the Examination of Water and Wastewater* at the time of analysis, or by other such methods approved by an Analyst.
4. All analyses shall be performed in a laboratory accredited by the Canadian Association for Laboratory Accreditation (CALA) for the specific analyses to be performed or as approved by an Analyst.

Part C: SNP Station Descriptions and Monitoring Requirements

Table 1: SNP Station Table

SNP station	Location	Coordinates	Sampling Frequency	Sampling Parameters	Rationale
17-1	Water intake at Great Bear Lake.	66° 42' 31 N 119° 40' 48 W	Monthly during intake.	Volume of Water in m ³	To monitor the monthly and annual quantity of Water withdrawn for use.
17-2	The shore of Great Bear Lake at the closest point downstream of the Sewage Disposal Facilities (Gravel Filtration Field).	66° 42' 33 N 119° 40' 27 W	Twice yearly, at the end of July and the end of August.	<ul style="list-style-type: none"> • CBOD₅ • Total Suspended Solids • Nutrients • Faecal Coliforms 	To monitor the quality of Water in the Receiving Environment.

Schedule 2: Annual Water Licence Report

Condition

1. The **Annual Water Licence Report** referred to in Part B, Condition 19 of this Licence shall include, but not be limited to, the following information about activities conducted during the previous calendar year:
 - a) The monthly and annual quantities in cubic metres of fresh Water obtained from all sources, as required in Part D, Condition 1 of this Licence;
 - b) A summary of the calibration and status of the meters and devices referred to in Part B, Condition 18 of this Licence;
 - c) A summary of engagement activities conducted in accordance with the approved **Engagement Plan**, referred to in Part B, Condition 20 of this Licence;
 - d) A summary of how Traditional Knowledge was incorporated into decision making;
 - e) A summary of Construction activities conducted in accordance with Part E of this Licence;
 - f) A summary of major maintenance activities conducted in accordance with this Licence;
 - g) A summary of activities conducted in accordance with the approved **Waste Management Plan**, referred to in Part F, Condition 3 of this Licence, including:
 - i. A summary of approved updates or changes to the process or facilities required for the management of Waste;
 - ii. Monthly and annual quantities, in cubic metres, of solid Waste discharged to the Solid Waste Disposal Facilities;
 - iii. Monthly and annual quantities of Sewage discharged to the Sewage Disposal Facilities;
 - iv. Monthly and annual quantities, in cubic metres, of Sewage solids and/or sludge removed from the septic tanks and discharged to the Solid Waste Disposal Facilities;
 - h) A summary of activities conducted in accordance with the approved **Spill Contingency Plan**, referred to in Part H, Condition 2 of this Licence, including:
 - i. A list and description for all Unauthorized Discharges, including the date, NWT spill number, volume, location, summary of the circumstances and follow-up actions taken, and status (i.e., open or closed), in accordance with the reporting requirements in Part H, Condition 2 of this Licence; and
 - ii. An outline of any spill training carried out;
 - i) A summary of any Closure and Reclamation work completed;
 - j) Tabular summaries of all data and information generated under the SNP in Schedule 1 of this Licence, in Excel format;
 - k) A list of any non-compliance(s) with the conditions of this Licence or any directive from the Board pursuant to the conditions of this Licence;

Condition

- l) A summary of actions taken to address concerns, non-conformances, or deficiencies in any reports filed by an Inspector; and
- m) Any other details requested by the Board by July 1 of the year being reported.

Schedule 3: Conditions Applying to Security

Condition

- | |
|--|
| 1. a) The amount of security referred to in Part C, Condition 1 (POST SECURITY DEPOSIT), shall total \$20,000, following the issuance of this Licence. |
|--|

Schedule 4: Conditions Applying to Construction

Condition

1. The **Structure Description and Construction Plan** referred to in Part E, Condition 3 shall include, but not be limited to, the following:
 - a) Information regarding the facilities:
 - i. A description of the facilities to be constructed, including the purpose of the facilities;
 - ii. The proposed location(s) of the facilities, with GPS coordinates and a map to scale;
 - iii. Relevant background information for the area beneath the footprint of the facilities;
 - iv. Construction specifications and performance parameters;
 - v. A description of any operations and maintenance requirements associated with the facilities; and
 - vi. An explanation of why the facilities do not need to be designed by a Professional Engineer.
 - b) Information regarding the Construction of the facilities:
 - i. A Construction schedule;
 - ii. A description of the materials required for Construction, including, but not limited to:
 - a. sources;
 - b. quantities;
 - c. physical characteristics; and
 - d. geochemical characteristics.
 - iii. A description of any potential effects on the Receiving Environment associated with Construction of the facilities; and
 - iv. A description of any mitigation measures that will be undertaken to minimize the potential impacts identified as per (b)(iii).
 - c) Information regarding monitoring during Construction, including:
 - i. A description of any monitoring that will be conducted to determine the potential impacts to the Receiving Environment and the effectiveness of the mitigation measures described as per (b)(iv), including, but not limited to:
 - a. locations;
 - b. parameters;
 - c. frequencies; and
 - d. rationale.
 - ii. Linkages to other monitoring programs required in this Licence.
 - d) A description of how monitoring will be evaluated and what actions may be taken in response to monitoring results.

Schedule 5: Conditions Applying to Closure and Reclamation

Condition

1. The final **Closure and Reclamation Plan** referred to in Part I, Condition 1 of this Licence shall include, but not be limited to the following information:
 - a) A description of the overall goals for Closure and Reclamation of the Project, including expected future land use;
 - b) A description of engagement related to Closure and Reclamation planning, including a summary of completed and planned engagement, and links to the **Engagement Plan** referred to in Part B, Condition 20 for the Project;
 - c) A list of any other regulatory authorizations required for Closure and Reclamation of the Project;
 - d) A description of the pre-existing and current Project environment, including, but not limited to:
 - i. climatic conditions;
 - ii. physical conditions;
 - iii. chemical conditions;
 - iv. biological conditions;
 - v. any physical or chemical assessments of soil, water, and permafrost; and
 - vi. traditional uses.
 - e) A description of the Project, including, but not limited to:
 - i. site history;
 - ii. Project development;
 - iii. current status of the Project;
 - iv. maps delineating all disturbed areas, borrow material locations, site facilities, hydrological features, and elevation contours; and
 - v. photographs.
 - f) A description of each Project component, including, but not limited to:
 - i. Sewage Disposal Facilities;
 - ii. Solid Waste Disposal Facilities;
 - iii. Water Supply Facilities;
 - iv. buildings and equipment;
 - v. areas affected by spills or Unauthorized Discharges; and
 - vi. other areas affected by Project activities.
 - g) For the Project site, a description of Closure and Reclamation plans, including, but not limited to:
 - i. preferred Closure and Reclamation option and method for each Project component identified in condition (f) above;
 - ii. Water management and restoration of natural drainage;
 - iii. predicted environmental effects during and after Closure and Reclamation activities;

Condition

- iv. post-closure monitoring, maintenance, and reporting;
 - v. uncertainties and contingencies; and
 - vi. climate change considerations;
-
- h) A description of any planned Progressive Reclamation;
 - i) An implementation schedule that includes Progressive Reclamation and final Closure and Reclamation activities; and
 - j) A Closure Cost Estimate.

Signed on behalf of the SAHTÚ LAND AND WATER BOARD



VALERIE GORDON, Chair



NATALIE LIPKA, Witness

Attachments

Attachment A: Concordance Table of Items Requiring Submission

This table summarizes the information the Licensee is required to submit as per the Water Licence conditions. It supplements the Water Licence. If there are any discrepancies between this table and the body of the Water Licence, the Water Licence conditions prevail.

Table 1: Concordance Table of Items Requiring Submission		
Condition	Requirement	Timeline
Part B, Condition 9: ANNUAL REVIEW	Conduct an annual review of all plans, programs and manuals, and make any revisions necessary to reflect changes in operations, contact information, or other details, to be submitted each year.	No later than December 1 each year.
Part B, Condition 10: REVISIONS	Submit revised plans, programs, or manuals that require Board approval to the Board, for approval.	A minimum of 90 days prior to the proposed implementation date for the changes.
Part B, Condition 19: ANNUAL WATER LICENCE REPORT	Submit an Annual Water Licence Report to the Board and an Inspector, in accordance with the requirements of Schedule 1, Condition 1.	Beginning December 1, 2024 and no later than every December 1 thereafter.
Part B, Condition 20: ENGAGEMENT PLAN - REVISED	Submit to the Board, for approval, a Waste Management Plan – Revised .	By December 1, 2024, and no later than every December 1 thereafter, if revisions.
Part B, Condition 21: NOTIFICATION – RE-COMMENCEMENT	Provide written notification to the Board and an Inspector, including commencement date, and the name and contact information for the individual responsible for overseeing the Project.	A minimum of ten days prior to re-commencement of Project activities following a temporary shut-down period.
Part E, Condition 3: STRUCTURE DESCRIPTION AND CONSTRUCTION PLAN	Submit to the Board, for approval, a Structure Description and Construction Plan , in accordance with the requirements of Schedule 3, Condition 1 (unless authorized in writing by an Inspector).	A minimum of 90 days prior to the commencement of Construction.
Part E, Condition 4: NOTIFICATION – CONSTRUCTION	Provide written notification to the Board and an Inspector, including the Construction commencement date, and the name and contact information for the individual responsible for overseeing the Construction.	A minimum of ten days prior to the commencement of Construction.
Part F, Condition 3 : WASTE MANAGEMENT PLAN - REVISED-	Submit to the Board, for approval, a Waste Management Plan – Revised .	By December 1, 2024, and no later than every December 1 thereafter, if revisions.
Part H, Condition 2: SPILL CONTINGENCY PLAN - REVISED	Submit to the Board, for approval, a Spill Contingency Plan – Revised .	Within 90 days of Licence issuance, by September 14, 2024, and no later than every December 1 thereafter, if revisions.
Part I, Condition 1: CLOSURE AND RECLAMATION PLAN - REVISED	Submit to the Board, for approval, a Closure and Reclamation Plan – Revised .	By December 1, 2024, and no later than every December 1 thereafter, if revisions.
Part I, Condition 2: CLOSURE AND RECLAMATION PLAN - FINAL	Submit to the Board, for approval, a final Closure and Reclamation Plan , in accordance with the requirements of Schedule 4, Condition 1.	Six months prior to the closure and reclamation of the Project.
Part I Condition 5: PROGRESSIVE RECLAMATION – NOTIFICATION	Provide written notification to the Board and an Inspector of any approved Progressive Reclamation that will be conducted in the upcoming year.	Beginning May 1, 2025 and no later than every May 1 thereafter.
Part I, Condition 6: CLOSURE AND RECLAMATION COMPLETION REPORT	Submit to the Board a Closure and Reclamation Completion Report .	Within 90 days of completing Closure and Reclamation of the Project.

Attachment B: Revision History Table

The Table below summarizes revisions made to the Licence since its effective date (as set out on the Cover Page)

Date	Location of change	Description of change
[issuance date of updated or amended Licence]	[Part(s) and/or Condition(s) of Licence]	-



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Reasons for Decision

Issued pursuant to section 72.25 of the *Mackenzie Valley Resource Management Act* (MVRMA) and subsection 26(1) of the *Waters Act*.

Water Licence Application	
File Number	S24L3-001
Company	Great Bear Lake Lodge Ltd.
Project	Renewal Type B Water Licence
Location	Dease Arm, Great Bear Lake Lodge, NT
Activity	Municipal; Outfitting Camp – domestic activities
Date of Decision	June 3, 2024

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On June 3, 2024, the Sahtu Land and Water Board (SLWB or Board) met and considered the Application made by Great Bear Lake Lodge Ltd. (Applicant) to the Board on February 29, 2024 for renewal Water Licence (Licence) S24L3-001 for the use of water and the deposit of waste for the renewal of Type B Water Licence (the Project) at the Great Bear Lake Lodge, located in Dease Arm of Great Bear Lake, NT. After reviewing the Application and the evidence gathered during the regulatory proceeding, the Board has made the following decisions:

- 1) To issue Water Licence S24L3-001 for a term of 10 years;
- 2) To require revisions to the Engagement Log 1.0 as part of the Engagement Plan 1.0, which the Applicant must submit as Version 2.0 by December 1, 2024 for a conformity confirmation.
- 3) To require revisions to the Waste Management Plan Version 3.0 of which the Applicant must submit as Version 4.0 of the Plan by December 1, 2024 for a conformity confirmation.
- 4) To require revisions to the Spill Contingency Plan Version 4.1, which the Applicant must submit as Version 5.0 of the Plan within 90 days of the effective date of the Licence for a conformity confirmation.
- 5) To require revisions to the Closure and Reclamation Plan Version 4.0 which the Applicant must submit as Version 5.0 of the Plan by December 1, 2024 for a conformity confirmation.

These Reasons for Decision set out the Board’s regulatory process for the Application and rationale for decisions regarding the Licence. A summary of the Application is provided in section [2.0](#), followed by an outline of the regulatory process for the Application in [section 3.0](#). [Section 4.0](#) describes how the applicable legislative requirements have been met. The Board’s decisions and supporting rationale are set out in [section 5.0](#) for the Licence.

1.0 List of Defined Terms and Acronyms

Applicant	Great Bear Lake Lodge Ltd.
Application	The complete application package submitted by the Applicant for Water Licence S24L3-001
CRP	Closure and Reclamation Plan
CIRNAC	Crown-Indigenous Relations and Northern Affairs Canada
DFO	Fisheries and Oceans Canada
Distribution List	The list of individuals and organizations to whom materials from the regulatory proceeding were circulated. ¹
EA/EIR	Environmental Assessment/Environmental Impact Review
ECCC	Environment and Climate Change Canada
GNWT	Government of the Northwest Territories
GNWT-ECC	Government of the Northwest Territories – Environment and Climate Change
IR	Information Request
Inspector	An Inspector designated under subsection 65(1) of the Waters Act
Licence	Water Licence S24L3-001

¹ To access the Distribution List, see the LWBs’ Online Review System for [SLWB – Deline District \(JG\)](#).

LWBs	Land and Water Boards of the Mackenzie Valley
MVLUR	Mackenzie Valley Land Use Regulations
MVLWB or Board	Mackenzie Valley Land and Water Board
MVRMA	Mackenzie Valley Resource Management Act
Minister	Minister of the Government of the Northwest Territories – Environment and Climate Change
ORS	Online Review System (https://new.onlinereviewssystem.ca/reviews)
Party	As per the LWB Rules of Procedure , an applicant, a person, or an organization participating in this regulatory process.
Project	Renewal Type B Water Licence at Great Bear Lake Lodge, the undertaking as described in Part A of the Licence
Review Board	Mackenzie Valley Environmental Impact Review Board
SCP	Spill Contingency Plan
SLWB or Board	Sahtu Land and Water Board
Standard Licence Conditions	LWB Standard Water Licence Conditions Template
WMP	Waste Management Plan

2.0 Summary of Application

On February 29, 2024, the Applicant applied for a renewal Licence S24L3-001 (the Application).² The Application is to continue operation of Great Bear Lake Lodge (GBLL), a seasonal fishing lodge in Dease Arm of Great Bear Lake, NT. These activities are located outside of federal areas within the Sahtú Settlement Area – Déliᑎᑦ District. GBLL has previously held Licences S02L3-001 (2004-2009), S12L3-002 (2012-2018), S17L3-001 (2018-2019), S19L3-001 (2019-2024).

In making its decision and preparing these Reasons for Decision, the Board has reviewed and considered:

- 1) The Application as submitted by the Applicant for the Project;
- 2) The evidence and submissions received by the Board from the Applicant in relation to the Licence; and
- 3) The comments and recommendations, evidence, and submissions received by the Board from Parties during the regulatory proceeding.

3.0 Regulatory Process

On February 29, 2024, the Applicant submitted the Application, which was deemed complete on March 19, 2024 and circulated to the Distribution List for public review on the Online Review System (ORS).³

² See [SLWB Online Registry](#) for [Great Bear Lake Lodge Ltd. – S24L3-001](#).

³ See LWB's Online Review System for [Great Bear Lake Lodge Ltd. Water Licence Renewal](#).

Board staff also circulated a draft Licence for review with the Application to allow all Parties the opportunity to comment on the specific wording of the draft conditions.

On April 9, 2024, the review period was extended to April 25, 2024 in response to a request from a reviewer as there were issues accessing the files. By April 25, 2024, the Board received comments and recommendations regarding the Application from the following Parties: Sahtu Renewable Resources Board (SRRB), Fisheries and Oceans Canada (DFO), Transport Canada, and the Government of the Northwest Territories – Environment and Climate Change (GNWT-ECC). On May 3, 2024, the Applicant responded to the Parties’ comments and recommendations.⁴

On June 3, 2024, the Board met and made its preliminary screening determination for the Project.⁵

On June 3, 2024, the Board met to make decisions regarding the Application. These decisions and related reasons are described in sections [5.0](#), and [6.0](#) below.

4.0 Legislative Requirements Related to Licence Issuance

This Project is subject to the [MVRMA](#), the [Waters Act](#), and the [Waters Regulations](#) with respect to licensing, because it is located outside of federal areas.

As per the [Waters Regulations](#) the proposed use of water, and the deposit of waste for this Project require a licence. Accordingly, the Board has jurisdiction to issue the Licence as per subsection 60(1.1) and section 102 of the [MVRMA](#).

In conducting its regulatory process for the Application (as described in sections [2.0](#) and [3.0](#) above), the Board has ensured that section 62 of the [MVRMA](#) and all applicable legislative requirements have been satisfied as outlined in the subsections below. The Board has considered the people and users of the land and water in the Mackenzie Valley, and any Traditional Knowledge and scientific information that was made available to the Board during the regulatory proceeding, as per section 60.1 of the [MVRMA](#). The consideration of information provided to the Board is discussed in detail below and in sections [5.0](#).

4.1 Consultation, Engagement, and Public Notice

As per paragraph 60.1(a) of the [MVRMA](#), in exercising its authority, the Board must consider the importance of conservation to the well-being and way of life of Indigenous peoples of Canada, specifically those to whom section 35 of the *Constitution Act*, 1982, applies and who use an area of the Mackenzie Valley. Accordingly, the Board works with applicants, affected parties (including Indigenous governments and organizations), and other parties (such as other boards and regulators) to ensure that potential

⁴ See [SLWB Online Registry for S24L3-001 – GBL – Comment – Proponent Response Table – May 7 24](#).

⁵ See [SLWB Online Registry for S24L3-001 – GBL – Preliminary Screening Notification to Review Board – Determination and Reasons for Decision – June 4 24](#).

impacts of proposed projects, including impacts on rights under section 35, are understood and carefully considered before decisions are made with respect to the issuance of permits and licences.

The Board's requirements for engagement are set out in the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#).⁶ The Policy and Guidelines were developed to ensure that the Board's obligations for achieving meaningful consultation (as set out by land claims and applicable legislation) with all affected parties, including Indigenous groups in the Mackenzie Valley, are met and engagement and consultation results clearly articulated. In accordance with the Policy and Guidelines, the Applicant's engagement efforts and proposed procedures are detailed in the Engagement Record and Plan (Version 1), respectively,⁷ submitted with the Application. The Board has approved the Applicant's Engagement Plan (Version 1), and the Board's reasons for this decision are described below in [section 5.3](#) with edits required to the Engagement Log. Following issuance, the Applicant must continue engagement efforts as outlined in the Engagement Plan, once approved, and as required in the Licence.

The Application was posted to the Board's Public Registry and distributed through the ORS. As the Project is located in the Sahtu Settlement Area – Déline District, the appropriate organizations, governments, First Nations, and Indigenous organizations were included in the Distribution List.⁸ The Distribution List was used throughout this proceeding to circulate submissions, information, and updates relevant to the proceeding; the List was updated if needed, and (if requested) individuals with specific interests in the Project were added. More information about the proceeding for the Application is provided above in [section 3.0](#).

In accordance with sections 63 and 64 of the [MVRMA](#), the Board is satisfied that notice of and access to copies of the Application was provided, and that a reasonable amount of time was given to communities, First Nations, and the public to participate in this proceeding and make submissions to the Board.

4.2 Water Use Fees

There are no water use fees set out in the [Waters Regulations](#) for municipal water use.

4.3 Existing Licences

During the time period established in the Notice of Application, no licensees or applicants contacted the Board to identify potential effects from the Project on other projects, and there are no other applicants with precedence. Accordingly, with respect to paragraph 26(5)(a) of the [Waters Act](#), the Board is satisfied

⁶ See [SLWB Policies and Guidelines](#) webpage to access the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#).

⁷ See [SLWB Online Registry](#) for [S24L3-001 – GBLL – Engagement Log V1.0 – Feb 29 24](#) and [S24L3-001 – GBLL – Engagement Plan V1.0 – Feb 29 24](#).

⁸ To access the Distribution List, see the LWBs' Online Review System for [SLWB – Deline District \(JG\)](#).

that issuing the Licence to the Applicant will not adversely affect, in any significant way, any existing licensee or any other applicant, provided the Applicant complies with the conditions of the Licence.

4.4 Compensation to Existing Water Users

Paragraph 26(5)(b) of the [Waters Act](#) prohibits the issuance of the Licence unless the Board is satisfied that appropriate compensation has been or will be paid by the Applicant to persons who would be adversely affected by the use of waters or deposit of waste proposed by the Applicant, at the time when the Applicant filed the Application with the Board.

The Board received no claims for compensation either during the time period established in the Notice of Application, or during the remainder of the proceeding. Provided the Applicant complies with the Licence conditions, the Board is satisfied there are no water users or persons listed in paragraph 26(5)(b) of the [Waters Act](#) who will be adversely affected by the proposed use of waters or deposit of waste.

4.5 Water Quality Standards

With regards to subparagraph 26(5)(c)(i) of the Waters Act, no water quality standards have been prescribed in the [Waters Regulations](#); however, the LWB [Waste and Wastewater Management Policy](#) applies to the Licence, and the primary objective of the Policy is “protection of water quality in the receiving environment.” This objective is directly reflected in the Licence Condition OBJECTIVE – WASTE AND WATER MANAGEMENT, and in accordance with the Policy and this objective, the Board has set out conditions in the Licence regarding waste and wastewater management, and management plan requirements. The Board is satisfied that the conditions set out in the Licence are consistent with the Policy and compliance with these conditions will ensure that waste will be managed and disposed of in a manner that will be protective of water quality in the receiving environment. These conditions and detailed rationale are described in [section 5.7](#) (Licence).

4.6 Effluent Quality Standards

With regards to subparagraph 26(5)(c)(ii) of the [Waters Act](#) no effluent quality standards have been prescribed in the [Waters Regulations](#); however, as noted in section 4.5 above, the LWB [Waste and Wastewater Management Policy](#) applies to the Licence. In the absence of prescribed standards, the Policy sets out when and how the Board will include EQC and/or other requirements in a licence to protect water quality in the receiving environment. As described in [section 5.7](#) of these Reasons, based on the evidence gathered during this proceeding, the Board did not include EQC in the Licence, aligning with the Board’s approval of previous Licence S19L3-001. The Board has, however, set out other effluent management requirements in the Licence conditions and is nonetheless satisfied that these conditions are consistent with the LWB [Waste and Wastewater Management Policy](#), and that compliance with these conditions will ensure that effluent is disposed of in a manner that will be protective of water quality in the receiving environment. These conditions and detailed rationale are described in [section 5.7](#).

4.7 Financial Responsibility

Under paragraph 26(5)(d) of the [Waters Act](#), before the Board can issue the Licence, it must be satisfied that the Applicant's financial responsibility is adequate to complete the Project, including any required mitigation measures, and the closure and reclamation of the site.

Part C Condition 1 and Schedule 3 of the Licence (POST SECURITY DEPOSIT) set out the security requirements for the Project, which must be met before Project activities begin. The Board notes that the Applicant has submitted security under previous Licence S17L3-001⁹. Under subsection 35(2) of the [Waters Act](#), the Minister can apply this security to carry out mitigations and remedial measures in the event of non-compliance with an Inspector's orders, or to carry out closure and reclamation if the site is abandoned. As detailed in [section 5.4](#) of these Reasons, the Board has established the security requirements based on the closure cost estimate information provided during this proceeding, so the Board is satisfied that adequate financial resources will be in place to ensure that the Project site can be restored.

As a result, and for the reasons set out above, the Board is satisfied that the legislated requirement to establish the financial responsibility of the Applicant for the Project has been met.

4.8 Minimization of Adverse Effects

With regards to subsection 27(2) of the [Waters Act](#) the Board must ensure that the Licence conditions minimize potential adverse effects on other water and land users from the proposed use of water and deposit of waste. As discussed above in [section 4.1](#), the Applicant conducted engagement, and the Board also provided opportunities for potentially affected parties to make submissions to the Board during the regulatory proceeding. The Board did not receive notice of potentially adverse effects on other users of the water and lands in the Project area.

Regardless, as detailed in section 5.7, the Board has set conditions in the Licence to regulate waste management for the purpose of protecting the receiving environment. Additionally, as described in [section 5.5](#), based on the evidence, the Board has set conditions regarding the use of water for the Project, including limitations on the sources and volumes of water the Licensee can use. It is the opinion of the Board that compliance with the Licence conditions that have been set to protect the water sources and the receiving environment will also minimize any potential adverse effects on other water and land users in the Project area.

4.9 Time Limit

As required under section 48(1) of the [Waters Act](#), the Board made its decision on the Licence within nine months after receiving the complete Application.

⁹ See [SLWB](#) online Registry for [S17L3-001 – ENR Letter to Great Bear Lake Lodge Ltd. – security deposit increase – Aug 31 18](#)

4.10 Environmental Review (Part 5 of the MVRMA)

4.10.1 Preliminary Screening

On June 3, 2024, the Board met and reviewed the preliminary screening conducted for the Project on June 4, 2012.¹⁰ The Applicant has not proposed changes to the Project. Accordingly, the Board has determined that the Project is exempt from preliminary screening under Part 1, Schedule 2 of the Exemption List Regulations to the MVRMA. Consequently, no further preliminary screening was conducted.

The Board is satisfied that the requirements of Part 5 of the [MVRMA](#) have been met for the Project.

5.0 Decision – Water Licence S24L3-001

Having due regard to the facts, circumstances, and the merits of the submissions made to it, and to the purpose, and provisions of the [MVRMA](#) and the [Waters Act](#), the Board has determined that Licence S24L3-001 should be issued, subject to the scope, defined terms, conditions, and term contained therein. The Board's determinations and reasons for this decision are set out below.

The Licence has been developed to address the Board's statutory responsibilities; to protect the receiving environment and minimize potential adverse effects on other water users; and to address issues within the Board's jurisdiction that were identified and investigated during the regulatory proceeding.

In developing the Licence, the Board considered the LWB [Standard Water Licence Conditions Template](#) (Standard Licence Conditions)¹¹ and included a number of these standard conditions that are relevant to the Project. As noted in [section 3.0](#), Board staff circulated a draft Licence for review to allow Parties to provide specific input to the Board on possible conditions, and the Board considered these review comments and recommendations in making its determination on the Licence conditions.

The Standard Licence Conditions have been established by the Land and Water Boards (LWBs) based on information from LWB policies and guidelines, other applicable guidelines and best practices, meetings with Inspectors, input from LWB staff, and feedback from a public review. Each standard condition has been evaluated against the following characteristics of an ideal condition:

- Clearly part of LWBs' authority;
- Has a clear purpose and rationale;
- Is practical and enforceable; and
- Does not conflict with existing legislation (i.e., is not less stringent).

¹⁰ See [SLWB](#) Online Registry for [S12L3-002 – Preliminary Screening – Jun 04 12.pdf](#).

¹¹ See [SLWB](#) Policies and Guidelines webpage to access the LWB [Standard Water Licence Conditions Template](#).

The Standard Licence Conditions include general rationale for each standard condition, and as such, the language of any standard condition included in the Licence is only discussed in detail in the following sections of these Reasons for Decision when it specifically relates to concerns or recommendations raised during the regulatory proceeding. The Board's reasons for developing and including Project-specific conditions, including discussion of any concerns and recommendations raised regarding these conditions, are detailed in the relevant sections below.

Issues that were resolved by Parties to the Board's satisfaction during the proceeding are not addressed in detail in these Reasons.

5.1 Term of Licence

The Applicant has applied for a term of ten years for the Licence. Subsection 26(2) of the [Waters Act](#) allows for a licence term of not more than 25 years for a type B licence. During the renewal proceeding, no comments or recommendations were received regarding the Licence term. After reviewing the submissions made during this regulatory process, the Board has determined an appropriate term for the Licence is ten years.

5.2 Part A: Scope and Defined Terms

Part A of the Licence contains the scope and the defined terms used throughout the Licence.

5.2.1 Scope

The scope of the Licence is written to ensure the Licensee is entitled to conduct activities which have been applied for and have been subject to Part 5 of the [MVRMA](#). In setting out the scope of the Licence, the Board endeavoured to provide enough detail to identify and describe the authorized activities, without being unduly restrictive or prescriptive, and to allow for Project flexibility, as contemplated in the Application, throughout the term of the Licence.

Based on the activities described in the Licence Application and on the scope outlined in the Standard Licence Conditions, Board staff included a draft scope in the draft Licence that was circulated for public review. The Sahtu Renewable Resource Board (SSRB) enquired how it is known that no substantive changes have occurred in the scope (operations) since the original Licence. The Applicant responded that annual inspections are completed to ensure the operation is in compliance with the Licence.

As well, the conditions in Part A are consistent with the Standard Licence Conditions. These conditions ensure that the scope of the authorization includes all water uses and/or deposits of waste associated with the Project, and also clarify that the Licensee must comply with applicable legislation, including any changes to legislation that are deemed to automatically amend the Licence. The Board did not make any changes to the Scope in the draft Licence, and therefore, accepted it as the scope of the Licence.

5.2.2 Defined Terms

The Board defined certain terms in the Licence to ensure a common understanding of the conditions, to avoid future differences in interpretation of the Licence, to reflect Project-specific evidence, and to support consistency across licences and permits issued by the LWBs. For the most part, the Board selected applicable defined terms relevant to the Project from the Standard Licence Conditions. Where appropriate, the Board used defined terms that have been previously used in municipal licences with similar waste management systems.

5.3 Part B: General Conditions and Schedules 1 and 2

Part B of the Licence primarily contains general administrative conditions regarding implementation of the Licence, and compliance with the Licence conditions, Board directives, and LWB policies and procedures. This section also details compliance requirements and review and revision procedures for submissions required under the Licence. These conditions are consistent with the Standard Licence Conditions and are applicable to all licences.

PART B: COMPLY WITH SURVEILLANCE NETWORK PROGRAM and Schedule 1 and UPDATES TO SCHEDULES AND COMPLIANCE DATES

A Surveillance Network Program (SNP) is set out in Schedule 1 of the Licence. The SNP details the sampling and monitoring requirements related to compliance with several conditions in the Licence. Requirements for measuring flows and volume are based on standard licence conditions as are the reporting requirements. The Board can also update the SNP in accordance with Condition 15 (UPDATES TO SCHEDULES AND COMPLIANCE DATE(S)).

During the review, the SRRB (Comment #8) recommended additional monitoring and sampling for hydrocarbons near the float base and the airstrip in the future as it would help define what may be required in the Closure and Reclamation Program. The Figure in Appendix A of the Waste Management Plan shows the location of each SNP sampling station. The Applicant in response acknowledged this comment.

This Part B standard Condition 15 is included in the Licence to clarify that the Board may, at its discretion, update the Schedules and the SNP, and that such updates are not considered amendments to the Licence, unless otherwise directed by the Board. Such updates may be requested by the Licencee in writing at least 90 days in advance, or may be initiated by the Board based on the information available to it, and will undergo the Board's public review process before being considered by the Board. Should there be any reason to suspect hydrocarbons in waters near the float base or airstrip during an inspection, the analytical sampling parameters in Schedule 1 will be updated.

Compliance dates are included in the Licence conditions for various submissions and other requirements, and Schedules and a Surveillance Network Program (SNP) are appended to the Licence to set out the

detailed requirements associated with specific conditions in the main body of the Licence. The purpose of the Schedules is to provide greater clarity and to aid in interpretation of Licence conditions.

Part B: ANNUAL WATER LICENCE REPORT and Schedule 2

The requirements for the Annual Water Licence Report are outlined in Condition 19 (ANNUAL WATER LICENCE REPORT), and Schedule 2, Condition 1. The purpose of the Annual Water Licence Report is to provide the Board and all interested parties the opportunity to be annually updated on Project components and activities and compliance with Licence conditions, and to provide a platform for interested parties to submit comments, observations, feedback, and questions as necessary. The Report is also an important tool for evaluating the effectiveness of the Licence conditions.

In establishing the Annual Report requirements in the Licence, the Board primarily included requirements from the Standard Licence Conditions that are applicable to the Project and reflect the Licence conditions. All of these requirements are intended to provide clarity and summarize information already captured through existing submissions; they are not meant to be onerous. The Board organized these requirements to coincide with the layout of the Licence and to be consistent with the Standard Licence Conditions.

For clarity, Annual Water Licence Reports are required each year, regardless of whether the Licensee has conducted any activity during the reporting year.

Part B: ENGAGEMENT PLAN - REVISED

The Board assesses engagement adequacy through the LWB [Engagement and Consultation Policy](#) and [Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits](#). In accordance with the Policy and Guidelines, the Applicant included an Engagement Record and Plan Version 1.0 in the Application,¹² and these documents were distributed for public review with the Application.

During the review it was noted by the SRRB that a Traditional Knowledge Study has not been completed to date (Comment #3). The Applicant responded that they will continue attempts to coordinate a Traditional Knowledge Study with Déljñę.

As well, during the application review, SRRB commented (Comment #9) that the Engagement Log lists interactions which appear to be initiated by outside parties, rather than GBLL. The Board reviewed the Engagement Log which shows on-going dialogue between multiple parties on activities at the GBLL and agrees it is not clear who initiated communication and who responded in the communication, if applicable.

¹² See [SLWB Online Registry](#) for [S24L3-001 – GBLL – Engagement Log V1.0 – Feb 29 24](#) and [S24L3-001 – GBLL – Engagement Plan V1.0 – Feb 29 24](#).

The Board requires that the Licensee revise the Engagement Log Version 1.0 and submit Version 2.0 by December 1, 2024 and to include the following:

- Indicate in the columns of the table in the Engagement Log who is initiating the communication
- Indicate in the columns of the table in the Engagement Log who responded, if applicable
- Update for any new entries of 2024, since time of application submission in February 2024

The Engagement Log will be considered approved when the Licensee receives written confirmation of conformity from Board staff.

5.4 Part C: Conditions Applying to Security Requirements and Schedule 3

Under subsection 35(1) of the [Waters Act](#), the Board is authorized to require the Licensee to provide security to the Minister. Subsection 35(2) of the [Waters Act](#) specifies how the security may be applied.

Part C of the Licence, by reference to Schedule 3 Condition 1a, sets the amount of security to be maintained by the Licensee and sets out requirements related to posting and adjusting security. The conditions in this Section are consistent with the Standard Licence Conditions.

Part C: POST SECURITY DEPOSIT

The POST SECURITY DEPOSIT condition allows for on-going activities for which security has already been posted to continue; the requirement to have security in place before commencing activities does not apply to continuing/on-going activities. The Board acknowledges that security must be transferred to the new licence.

There were concerns about the Applicant's closure cost estimate for the Security Deposit raised during the regulatory proceeding by SRRB (Comment #7) and GNWT-ECC (Comment #11) which recommended a RECLAIM security be provided and circulated for review by parties once a revised Closure and Reclamation Plan is submitted to the Board. The Applicant acknowledged to improving the details of the Closure and Reclamation Plan but did not agree to updating the security amount at this time, as there are no changes to the operation since the last Licence renewal or plans to cease operations since the last Security Deposit review.

As part of the proceeding for the previous Licence S19L3-001 and Permit S21F-002, the Security Deposit in the amount of \$20,000 and \$15,000 respectively, was required to ensure that restoration of the site and any necessary measures that may be required after discontinued use of the lands can be covered addressing concerns regarding facility integrity. These deposits are consistent with the intent of meeting the Conformity Requirement #12 (Financial Security) of the Sahtu Land Use Plan. A comparable project and accepted Security Deposit to this Licence is the Great Slave Lake Lodge. The Licence (MV2022L3-003) in this case holds an accepted closure cost estimate of \$16,300, using the RECLAIM model.

Consistent with recent Board practice, the Board has placed the land-related liability amounts under the Permit and the water-related liability amounts under the Licence: \$15,000 is required under the Permit S21F-002 (renewal in 2024), and \$20,000 is required under the Licence.

Like other licences, the Licence includes standard conditions that allow the Board to request an updated closure cost estimate from the Licensee at any time, and to adjust the security amount at any time, based on available information.

The Board is satisfied that the security requirements it has imposed ensure that sufficient financial resources will be in place in advance of any liabilities that will be incurred. The Board has accepted the Applicant's previous estimate and set the security deposit accordingly to \$20,000.

5.5 Part D: Conditions Applying to Water Use

Part D of the Licence contains conditions related to water use for the Project. These are consistent with the Standard Licence Conditions.

The maximum quantity of water that can be withdrawn from Great Bear Lake each year by the Applicant is 2440 m³. This amount is based on the daily withdrawal amount applied for by GBL, for the months of operation (June through September). During the review of the draft Licence conditions, no concerns with the proposed annual volume were received.

During the review of the Application, the Department of Fisheries and Oceans Canada (Comment 1) was seeking confirmation of the water intake flow rate that will be utilized for the water withdrawal, as per the Interim Code of Practice for end-of-fish screens, as the intake rate allowable for small-scale water intakes, is up to 150 litres/second. The Applicant acknowledged this comment. This objective is directly reflected in the Licence Condition 4 WATER INTAKE SCREEN.

5.6 Part E: Conditions Applying to Construction and Schedule 4

Part E and Schedule 4 of the Licence contains conditions applying to Construction activities for the Project. These are consistent with the Standard Licence Conditions.

Part E: STRUCTURE DESCRIPTION AND CONSTRUCTION PLAN and Schedule 4

The Board has included this Standard Condition based on the absence of documented Engineered Structures at Great Bear Lake Lodge. This condition will apply to any non-engineered Water and Waste management structures that are proposed after issuance; however, in these situations, it will still need to be determined whether a preliminary screening is required for the proposed structure. The Board notes that for very small or temporary structures with low risk to the Receiving Environment, the Inspector may

determine that a Structure Description and Construction Plan is not necessary. The Licensee is encouraged to discuss planned structures and associated risks with the Inspector in advance of submitting this Plan.

The schedule outlines the information requirements. In addition to general information about the structure, construction information, and potential impacts and mitigations, rationale for why it does not need to be an engineered structure is required.

As this Plan is for Board approval, it will be publicly reviewed, allowing for incorporation of comments or concerns raised.

During the review period, there were comments from GNWT-ECC (Comments #6, #7) recommending an engineered drawing and design report be provided to understand how the grey water and sewage waste is being pumped into the gravel filtration field, and where the solids are being buried. The applicant responded that the sewage solids are removed using a truck and trailer unit at the end of each season, and that the greywater lines are inspected daily. Board staff note that details on this system are in the Waste Management Plan with a schematic showing the general location of the greywater lines to the gravel filtration field. Based on the size and scope of the work, there is currently not a requirement for engineered drawings for this system.

5.7 Part F: Conditions Applying to Waste and Water Management

Part F of the Licence contains conditions applying to Waste and Water management activities for the Project. These are consistent with the Standard Licence Conditions. Project-specific conditions were developed where necessary.

Part F: WASTE MANAGEMENT PLAN - REVISED

All applicants must submit detailed waste management information, identifying all types of waste that will be produced by the project (including quantity and quality) and describing the disposal methods that are proposed for each type of waste. For most applicants, this will be in the form of a Waste Management Plan, developed in accordance with the LWB [Guidelines for Developing a Waste Management Plan](#),¹³ and licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board. The Guidelines can be applied to a wide range of projects and are intended to ensure that all waste management activities are carried out in a way that is consistent with best practices and applicable guidelines to minimize waste released from a project.

The Licensee included a Waste Management Plan Version 3.0 in the Application.¹⁴ The Board considered this Plan as part of the Application Package.

¹³ See [SLWB Policies and Guidelines](#) webpage to access the LWB [Guidelines for Developing a Waste Management Plan](#).

¹⁴ See [SLWB Online Registry](#) for [S24L3-001 – GBLL – Waste Management Plan V3.0 – Feb 29 24](#).

Revisions required: The Board requires that the Licensee revise the Waste Management Plan in response to reviewer comments and submit Version 4.0 by December 1, 2024 to reflect the Project activities and to include the following:

- the GPS location(s) of the greywater lines and add to the map shown in Appendix A
- the GPS location of the waste pit that is east of the gravel filtration field, where the ash and solid sewage are buried, and add to the map shown in Appendix A
- photos of the Septic Tanks and Pumps used in the system in the Waste Management Plan
- dimensions, details, and photos of the incinerator

The Plan will be considered approved when the Licensee receives written confirmation of conformity from Board staff. A public review will typically not be required to confirm conformity; however, if the revised Plan includes additional information beyond what has been requested above, a public review may be required before it can be considered by the Board.

Part F: NOTIFICATION – WASTE DISPOSAL

Applicants (other than municipalities) planning to deposit Waste at municipal facilities must obtain written agreement from the municipality in advance and should submit it with their application. However, applicants should note that the ability of the municipality to accept and manage additional Waste streams may change over time, so applicants should develop contingencies as part of their Waste Management Plan. The intent of this Condition 5 is to allow the Inspector an opportunity to confirm that the licenced municipal facility is still able to accept the Waste as originally proposed. This condition includes a timeline and frequency of notification that is Project-specific; the Board received no comments on this condition during the public review of the draft Licence conditions.

5.8 Part G: Conditions Applying to Aquatic Effects Monitoring Program

Part G of a licence will typically contain Standard Conditions applying to an Aquatic Effects Monitoring Program (AEMP) in accordance with the LWB/GNWT [Guidelines for Aquatic Effects Monitoring Programs](#)¹⁵. In this case, the Board did not include any AEMP requirements in the Licence, because the Board did not receive any evidence recommending or indicating that an AEMP is needed.

5.9 Part H: Conditions Applying to Contingency Planning

Part H of the Licence contains conditions related to spill contingency planning and reporting, reclamation of spills and unauthorized discharges, and emergency response for the Project. These conditions are consistent with the Standard Licence Conditions.

¹⁵ See [SLWB Policies and Guidelines webpage](#) to access the LWB/GNWT [Guidelines for Aquatic Effects Monitoring Programs](#).

Part H: SPILL CONTINGENCY PLAN - REVISED

All applicants must describe spill contingency planning. For most applicants, this will be in the form of a Spill Contingency Plan (SCP), developed in accordance with the INAC [Guidelines for Spill Contingency Planning](#),¹⁶ and licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board.

The Licensee included a SCP Version 4.1 in the Application.¹⁷ The Board considered this Plan as part of the Application Package. During the review, there were comments from GNWT-ECC (Comments #2, 4, and 9) recommending updates to the SCP as noted below.

Revisions Required: The Board requires that the Licensee revise the SCP and submit Version 5.0, within 90 days of the effective date of the Licence, to reflect updates as agreed to during the regulatory proceeding, to reflect the Project activities, to meet the applicable guidelines, and to include the following:

- Section 1.2 - Update the contact name of the Manager of Wildlife and Environment
- Section 1.2 - Update the contact name of the Water Resource Officer
- Section 1.8, 1.7, 3.1, and 3.2 - Add in Raw Sewage
- Section 1.10 - Update the link to function for the NWT Spill Report form

The Plan will be considered approved when the Licensee receives written confirmation of conformity from Board staff. A public review will typically not be required to confirm conformity; however, if the revised Plan includes additional information beyond what has been requested above, a public review may be required before it can be considered by the Board.

Part H: MATERIAL STORAGE – ORDINARY HIGH-WATER MARK

The intent of this Condition MATERIAL STORAGE – ORDINARY HIGH-WATER MARK is to provide a buffer to prevent fuel spills from impacting surface Water. The standard version of this condition, with a 100-metre setback, was not included in the draft Licence conditions distributed for public review. Reviewer feedback from GNWT-ECC (Comment #3, #10) indicates a request this Standard Condition be included and for GBLL to work with the Regional Water Resource Officer to gain compliance with the condition, with a potential minimum 30 m set-back.

The Applicant acknowledged these comments but requests an exemption to the fuel-storage distances in the Licence and subsequent inspection reports, as (3) fuel storage tanks and associated infrastructure are less than 30 metre from the ordinary high-water mark.

¹⁶ See [SLWB](#) External Policies and Guidelines webpage to access the INAC [Guidelines for Spill Contingency Planning](#).

¹⁷ See [SLWB](#) Online Registry for [S24L3-001 – GBLL – Spill Contingency Plan V4.1 – Feb 29 24](#).

Board staff note the Third-Party report submitted with the [2022 Annual Report](#) regarding this setback condition. The conclusion of this report was that the risk of moving the fuel tanks and the associated infrastructure was greater than the current location of the modern double-walled fuel tanks within appropriate volume lined containment cells.

The Board, when considering the application, may authorize fuel storage within 100 meters of Water under specific conditions (e.g., if moving fuel further poses a risk of leak/spills, if there is a hill separating fuel from water, etc.). The Spill Contingency Plan shows a map of the (3) fuel tanks that lie within the 30 metre setback. The condition has been included in the Water Licence conditions with updated wording *'The Licencee shall not establish any fuel storage facilities or refueling stations, or store chemicals or Wastes within 30 meters of the Ordinary High-Water Mark of any Watercourse, except in accordance with the approved Spill Contingency Plan.'* The Board has approved this condition.

5.10 Part I: Conditions Applying to Closure and Reclamation and Schedule 5

Part I and Schedule 5 of the Licence contain conditions applying to closure and reclamation, including progressive reclamation of the Project. These are consistent with the Standard Licence Conditions.

The conditions in this Section are closely related to the conditions applying to the security deposit (Part C of the Licence); the closure cost estimate and the security deposit are directly related to the activities described in the Closure and Reclamation Plan, and updates to the Plan may result in updates to the closure cost estimate and the security deposit.

Part I: CLOSURE AND RECLAMATION PLAN - REVISED

All applicants must describe closure and reclamation planning. For most applicants, this will be in the form of a Closure and Reclamation Plan (CRP), licences and permits will include standard conditions regarding compliance with the Plan, as approved by the Board.

The Licensee included a CRP (Version 4) with the Application¹⁸, which was previously approved under GBL's Licence S19L3-001. The Board considered this Plan as part of the Application Package. During the public review of the renewal Application there were comments from SRRB (Comment #7) and the GNWT-ECC (Comment #11) requesting expanded details, schedules, planning and logistics of the closure and reclamation work and an updated RECLAIM estimate. The Applicant acknowledged this and will work to improve the CRP for submission along the same timeline as the Annual Report (December 1, 2024).

Consistent with recent Board practice, the Board has placed the land-related liability amounts under the Permit and the water-related liability amounts under the Licence: \$15,000 is required under the Permit

¹⁸ See [SLWB](#) online Registry for [S24L3-001 – GBL – Closure and Reclamation Plan V4.0 – Feb 29 24](#).

S21F-002 (renewal in 2024), and as described in section 5.4 of these Reasons \$20,000 is required under the Licence.

The Board acknowledges that GBL is currently operational and holds a long-term lease with the GNWT. Part I, Condition 2 and Schedule 5, Condition 1 requires the submission of a detailed final Closure and Reclamation Plan, six months in advance, should GBL plan to commence any closure and reclamation activities. This submission will ensure that any updates to closure and reclamation planning are approved prior to these activities commencing.

Revisions Required: The Board requires that the Licensee revise the CRP and submit Version 5.0 by December 1, 2024 to reflect the Project activities and to include the following:

- Expanded details on the Closure Plan;
- Expanded details Schedules;
- Expanded details on the Planning and Logistics; and
- RECLAIM estimate.

The Plan will be considered approved when the Licensee receives written confirmation of conformity from Board staff. A public review will typically not be required to confirm conformity; however, if the revised Plan includes additional information beyond what has been requested above, a public review may be required before it can be considered by the Board.

All CRPs for the Project submitted following the issuance of the Licence must meet the information requirements set out in Schedule 5, Condition 1.

5.11 Attachment A: Concordance Table of Submissions

Attachment A of the Licence contains a table that summarizes the submissions required by the Licence conditions.

5.12 Attachment B: Revision History Table

Attachment B of the Licence contains a table which identifies updates and tracks changes made to the Licence. This table is currently blank because this is a new Licence, but it will be updated throughout the life of the Licence.

6.0 Conclusion

Subject to the scopes, definitions, conditions, and terms set out in the Licence and for the reasons expressed herein, the SLWB is of the opinion that the activities, water use, and waste disposal associated with the Project can be completed by Great Bear Lake Lodge Ltd. while providing for the conservation, development, and utilization of waters in a manner that will provide the optimum benefit for all Canadians and in particular for the residents of the Mackenzie Valley.

Water Licence S24L3-001 contains provisions that the Board deems necessary to ensure and monitor compliance with the MVRMA, *Waters Act*, and the Regulations made thereunder, and to provide appropriate safeguards in respect of Great Bear Lake Lodge Ltd.'s use of the water as authorized by the Licence.

SIGNATURE

A handwritten signature in blue ink that reads "Valerie Gordon". The signature is fluid and cursive, with the first name "Valerie" being larger and more prominent than the last name "Gordon".

June 14, 2024

Valerie Gordon, Chair
Sahtu Land and Water Board

Date