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March 22, 2021

Files: MV2021L1-0006 & MV2021A0006

Terence Hughes
Regulatory and Community Affairs Advisor Paramount
Resources Ltd.
2800, 421-7 Avenue SW
CALGARY AB T2P 4K9

Sent by email

Dear Terence Hughes:

**Land Use Permit Application – Incomplete
Water Licence Application – Incomplete
Maintenance Monitoring, Abandonment, and Remediation Activities – Liard South, Fort Liard,
NT**

On March 12, 2021, the Mackenzie Valley Land and Water Board (Board) staff received the Applications for new Land Use Permit (Permit) MV2021A0006 and Water Licence (Licence) MV2021L1-0006 from Paramount Resources Ltd. (Paramount). The Applications have been reviewed by Board staff and found to be lacking sufficient information under section 19 and paragraph 22(1)(a) of the Mackenzie Valley Land Use Regulations (MVLUR) and under section 5 of the Waters Regulations. For the Applications to be considered complete and forwarded for review, the following information must be submitted to the Board's office:

Land Use Permit Application

1. Box 11 should include specific details on the main waste management methods that would be employed to address specific waste types generated by the project instead of generally reference to the Waste Management Plan, which primarily outlines an array of potential options that may be used to manage different waste types;
2. The Potential Impacts and Mitigation Table under Box 17 of the application should be updated to include all relevant impacts and mitigations relative to proposed Project activities. Reference is made to an Attachment A, which is not a substitute for completing the Potential Impacts and Mitigations Table;
3. Provide a closure cost estimate for the Project as required under Box 18. It should be noted that the estimate posted under Permit MV2016A0010 might not be reflective of

the scope of Permit Application MV2021A0006. The estimate should be prepared in accordance with relevant sections of MVLWB's *Guidelines for Closure and Reclamation Cost Estimates for Mines*; and

4. Provide confirmation of Paramount's eligibility to be issued a permit as required under Box 6 of the application form.

Water Licence Application

1. Confirm the water use required by the project; Box 4 states that 36,000 cubic metres of water required; however, the Table under Box 7 suggests the water requirements amount 2,160 cubic metres.
2. Provide a closure cost estimate for the Project in the context of the water licence application, as required under Box 14. It should be noted that the estimate posted under Licence MV2016L1-0002 might not be reflective of the scope of Licence Application MV2021L1-0006. This estimate should be prepared in accordance with relevant sections of the MVLWB *Guidelines for Closure and Reclamation Cost Estimates for Mines*;
3. The Potential Impacts and Mitigation Table under Box 10 of the application should be updated to include all relevant impacts and mitigations relative to proposed project activities. Reference is made to an Attachment A, which is not a substitute for completing the Potential Impacts and Mitigations Table;

General

1. Justify Paramount's request for screening exemption by showing that the overall scopes of new applications MV2021L1-0006 & MV2021A0006, respectively, are subsets of the authorizations they are intended to replace, namely, MV2016A0010 and MV2016L1-0002.

Spill Contingency Plan

1. Revise the Spill Contingency Plan to include the following information as outlined in INAC *Guidelines for Spill Contingency Planning*:
 - a) Response organization description;
 - b) Description of all potential spill types and scenarios (including wastewater and methanol), sources, sizes, and potential effects. It is noted that 'impacted materials' is not included as a potential spill scenario under the Plan introduction;
 - c) Action plan(s) (for all spill types or for different spill categories), with procedures for: initial action, reporting and updates, containing and cleaning up the spill, managing spill-related wastes, and restoring affected areas and completing clean-up. Action plans should be developed for spills on soil, and on/near water, snow, and ice, as applicable;
 - d) Thorough description of all spill prevention measures;
 - e) Location of spill response resources;
 - f) Identifying how the public and affected parties will be notified in the event of an emergency;
 - g) In adherence to the proceeding for the May 2020 submission of the Spill Contingency Plan, update the plan to include Acho Dene Koe First Nation's request to be notified in the event of a spill (ADKFN comment 1); and

h) Description of how the plan will be reviewed and revised.

Waste Management Plan

1. Confirm whether all the waste treatment/disposal options included in Table 2 of the Plan for the Fort Liard Project also apply to the Liard South Project and which option(s) is/are most likely to be implemented, given varying licence conditions that would apply to eventual option(s) selected.
2. Table 2 of the Waste Management Plan does not include treatment or disposal options for camp grey or black water, for the disposal or treatment of domestic wastes that cannot be burned or recycled, or for the disposal or treatment of hazardous wastes. If the final disposal facility of any waste remains in the Northwest Territories, acceptance confirmation from the waste management provider is required.

Upon receipt of this information, the Applications will be reviewed in accordance with the *Mackenzie Valley Resource Management Act* and Waters Regulation. For further assistance, please refer to "Guide To Completing Land Use Permit Applications to the Mackenzie Valley Land and Water Board" and "Guide To Completing Water Licence Applications to the Mackenzie Valley Land and Water Board" available on our website at www.mvlwb.com under "Apply for Permit/Licence" and "Forms and Guides".

If this supplementary information is not provided within ninety (90) days, then it shall be assumed that you do not wish to continue with the processing of these Applications, and the Applications will be returned to you.

If you have any questions or concerns, please email sjoseph@mvlwb.com.

Yours sincerely,



Sean Joseph
Regulatory Specialist

Cc'd: Danielle Rogers, GNWT-Lands, Resource Management Officer III, Dehcho Region
Kyle Christiansen, GNWT-Lands, Manager Resource Management, Dehcho Region
Jamie Chambers, GNWT-ENR, Regional Superintendent, Dehcho Region