

May 27, 2024

Mackenzie Valley Land and Water Board  
 P.O. Box 2130  
 4922 - 48th Street  
 7th Floor YK Centre Mall  
 Yellowknife, NT X1A 2P6

SLR Project No.: 204.030163.00001

Client Reference No.: 700734912

**RE: Application for a Type B Land Use Permit Under Trigger 5b(i) -  
 Confirmatory Soil Sampling and Limited Phase II Environmental Site  
 Assessment – Two PSPC Residential Properties  
 9818 101<sup>st</sup> Street and 9606 102<sup>nd</sup> Street  
 Fort Simpson, Northwest Territories**

**NOTE: TIME SENSITIVE DUE TO FORT SIMPSON FERRY CLOSURE AND SEASONAL  
 WORK AND SAFETY DUE TO OPEN EXCAVATION AT RESIDENTIAL PROPERTY**

## Revision History

**Table 1: Revision History Table**

Revision No	Prepared by	Effective Date	Revision List
Rev. 1	Shaun Lamoureux	September 5, 2023	N/A
Rev. 1.1	Shaun Lamoureux, Victoria Antoniak, Michael Brown	March 4, 2024	<ul style="list-style-type: none"> <li>Updated Application Package to meet requirements listed in the incomplete permit application letter No.1. See concordance table below.</li> <li>Changed to request for Type A Land Use Permit to allow slightly larger drill rig if necessary.</li> </ul>
Rev 1.2	Shaun Lamoureux, Michael Brown	May 23, 2024	<ul style="list-style-type: none"> <li>Updated Application Package to meet requirements listed in the incomplete permit application letter No.2. See concordance table below.</li> </ul>

## Introduction

This cover letter is prepared in accordance with *Mackenzie Valley Land and Water Board (MVLWB) Document Submission Standards Section 2.1 Cover Letters*. SLR Consulting (Canada) Ltd. is applying for a Type A Land Use Permit (LUP).

## Scope of Work

The Scope of Work is as follows:

### **9606 102<sup>nd</sup> Street, Fort Simpson**

- Utility locates – Subarctic Geomatics.
- Excavation of up to 20 m<sup>3</sup> of PHC impacted soils from a heating oil tank spill using a mini excavator and tandem truck.
- Following up on previous excavation during spill response. Removing soil from side walls and base to address remaining lightly impacted soils.
- Removing lightly impacted PHC soils from side walls and base of excavation.
- Loading and transporting approximately 20 m<sup>3</sup> or two tandem truck loads of lightly PHC impacted soils are anticipated to be transported to the KBL Yellowknife soil treatment facility. The tandem dump trucks will use the existing municipal roads to load and transport the soil. All shipments will be properly manifested.
- Drilling three groundwater monitoring wells each up to 8 m in depth at 9606 102<sup>nd</sup> Street Fort Simpson, NT using small track mounted drill weighing 4,100 lbs or 1,800 kg. Work to be completed by Great Slave Drilling.
- Collecting groundwater samples.
- Collecting one surface water grab sample from Mackenzie River.
- Collecting three sediment cores directly adjacent to high water mark.
- Remediation works

### **9818 101<sup>st</sup> Street, Fort Simpson**

- Excavation of a few cubic meters of PHC impacted soil resulting from leak from heating oil tank. Estimated at 2 m<sup>3</sup>.
- Removal and disposal of bollards and previous heating oil AST.
- Fill excavation and revegetate any disturbed areas if any.
- Remediation works

## Time Sensitive

This permit application is time sensitive due to the location of the and type of work. The work is to be completed in Fort Simpson. Accessing Fort Simpson requires a ferry crossing of the Liard River.

The Liard River Ferry (Highway 1) closes on average on November 3 and opens on May 13.

In addition, there is currently an open excavation from the removal of soils during the emergency response. This open excavation is on a residential property and is a risk to the property owners. SLR is anticipating that work be completed during the 2024 open water season in July/August.

### **Liard River Ferry (Highway 1)**

*Open for the season*



Vessel name: M.V. Lafferty

15-year average open date: May 13

15-year average close date: November 3



## Requested Permit Type and Period

The permit request is for a Type A LUP. The Type A application is to allow for a slightly larger drill if needed. The Type B limits for drill rigs may not be able to be met depending on field conditions and northern contractor resources.

The permit has been submitted for the full five-year term to allow for any iterative remedial works of similar scope, as environmental assessment projects generally are iterative in nature and dependent on the finding of each field work season. It is also required for long term (5 year groundwater monitoring activities). This is especially applicable to northern work where the construction season is significantly shorter, and access and logistics are often seasonally dependent. Engagement and other management plans will be updated with each iterative season of work and amendments will be applied for if necessary. Any work outside the scope of the LUP will require a separate land use permit application. The five-year period for the permit also allows for any delays due to wildfires and potential related evacuations.

## Concordance Table

This concordance provides the conditions of the MVLWB incomplete permit application letter dated September 15, 2023 and referencing the SLR Consulting (Canada) Ltd. – Land Use Permit – New Application – Incomplete – Phase I and II Site Assessment – Fort Simpson, NT. The concordance table presents a summary of the MVLWB requirements for complete permit application status and the actions taken to address these requirements.

**Table 2: Concordance Table**

Trigger	ID	Requirement	Action Completed
Incomplete Permit Application Status One	1	Must provide a copy of their current NWT Certificate of Registration in the application package and define the entity to whom the permit we be applied under	The SLR NWT Certificate of Registration of an Amalgamated Extra-Territorial Corporation is attached.  Permit issued to PSPC
	2	Requires an Engagement Plan, Record and Log	An Engagement Plan Version 2.0', Record and Log is included in the revised application as an attached document under separate cover letter
	3	Closure Cost Estimate	A Closure Cost Estimate is not required as the federal government is exempt from posting security.
	4	All potential impacts and proposed mitigations for the proposed activities are to be identify and described. Review and revise the Impact-Mitigation Table in the Application form accordingly.	An updated potential impacts and proposed mitigations plan has been prepared



Trigger	ID	Requirement	Action Completed
	5	<b>Updated Spill Contingency Plan.</b>	Spill contingency plan Version 2.0 has been updated and added as an Appendix to the application and in accordance with the INAC Guidelines for Spill Contingency Planning
	6	<b>Permit Application Fees.</b> As described in section 3.2, item 20 of the Guide, all fees are payable to the Receiver General for Canada.	A \$150 Application Fee will be mailed when permit is deemed complete.
	7	Label maps more clearly for reviewers by providing a legend.	Maps have been updated with legends and aerial photography.
Incomplete Permit Application Status Two	1	<b>Engagement Record:</b> The Engagement Record submitted with the Application indicates the affected parties were sent an engagement letter describing the project. However, follow-up with these parties is not described. Review the LWB Engagement Guidelines for Applicants and Holders of Water Licenses and Land Use Permits, follow-up with these parties and revise the Engagement Record in the Application accordingly.	The Engagement Plan Version 2.0 has been attached to this letter under separate cover letter
	2	<b>Management Plans:</b> Following the LWB Document Submission Standards 5, the Management Plans should be submitted as separate documents from the Application for public review, with individual cover letters for each of the management plans: <ul style="list-style-type: none"> <li>• Waste Management Plan</li> <li>• Spill Contingency Plan</li> <li>• Engagement Plan</li> </ul>	The updated Waste Management Plan Version 2.0,, Spill Contingency Plan Version 2.0,, and Engagement Plan Version 2.0 have been attached to this letter under separate cover letter
	3	<b>Proposed Project Schedule:</b> As described in section 3.2 of the Permit Guide, indicate the time of year the project activities will occur (i.e. which months of the year). Inconsistencies are found between the dates of drilling in the Scope of Work (May) and the Engagement plan (June/July). Review and revise the Application to address these inconsistencies	
	4	<b>Preliminary Screening:</b> See section 124(1) of the Mackenzie Valley Resource <i>Management Act</i> (MVRMA) <sup>6</sup> for further information on Preliminary Screenings. As described in Section 4.2 of the Permit Guide, a project, or specific project activities, may be exempt from screening under the Exemption List Regulations <sup>7</sup> ; under section 157.1 of the MVRMA; or for national security or emergency purposes.	



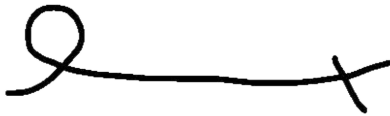
Trigger	ID	Requirement	Action Completed
	5	<b>Closure and Reclamation - Closure Cost Estimate:</b> As described in section 3.2 of the Permit Guide, the GNWT, federal, and community governments, and Indigenous Governments for permits on their own lands, are not required to post security. The Closure Cost Estimate submitted is not required as the federal government is exempt from posting security	A Closure Cost Estimate is not required as the federal government is exempt from posting security.

## Closure

Please contact Shaun Lamoureux with any questions or comments by phone at 1 250 819 9677 or email. Your time and consideration is greatly appreciated.

Regards,

SLR Consulting (Canada) Ltd.



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- Attachments
- 1 – MBLWB Land Use Application Form
  - 2 – Project Location and Layout Figures
  - 3 – Site and Equipment Photographs
  - 4 – Engagement Plan
  - 5 - Waste Management Plan
  - 6 - Spill Contingency Plan
  - 7 - SLR NWT Certificate of Amalgamation
  - 8 - PSPC Access Permission Letter
  - 9 - Mitigation Table

