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January 28, 2025

Sahtu Land and Water Board
Attn: Paul Dixon, Executive Director; Valerie Gordon, Chairperson
P.O Box 1
Fort Good Hope, NT
X0E 0H0

Sent via email

Re: Water Licence S13L1-007 Norman Wells Operation 60 Day Renewal – Proponent Response

Dear Mr. Dixon and Ms. Gordon,

Imperial Oil Resources NWT Limited (“Imperial”) thanks the Sahtu Land and Water Board (“SLWB” or “Board”) for the opportunity for interested parties and Imperial to provide input on the 60-day short-term renewal application of Water Licence S13L1-007 (“Licence”) submitted on January 7, 2025. As outlined in the application¹, Imperial requested the renewal of the Licence on an emergency basis under Section 119 (b) of the Mackenzie Valley Resource Management Act (“MVRMA”), to avoid a March 4, 2025, shut-in and remain under an active Licence while the Board initiated three-year renewal proceedings are completed.

Imperial appreciates the comments provided by interested parties on the Online Review System (ORS) to assist the Board in making a timely decision for the 60-day renewal application. Imperial will respond to the four comments directly via the ORS.

NWO Shut-in Preparations

Imperial has proactively developed an execution plan for the emergency shut-in of the Norman Wells Operation (NWO) in the event the 60-day Licence renewal is not issued by the SLWB before February 14, 2025. As outlined in a Condition 5 notification submitted to the CER per Operations Authorization (“OA”) 1210-001, shut-in activities are anticipated to take approximately 2-3 weeks, which would require starting by February 14, 2025, to complete the scope of work before the water licence expiry of March 4, 2025. Once initiated, the shut-in process does not contain a contingency to reverse and resume production if an approval is received after February 14. The earliest production could safely resume would be after break-up between May to June 2025, in the event the Board initiated 3-year renewal is approved.

As outlined in the Board’s Reasons for Decision for the Board initiated 3-year Licence renewal², broad support from interested parties indicated it is in the public interest to renew the Licence to prevent a shut-in of the NWO and the potential emergency considerations that would arise as a result. This includes the protection of property, the environment, public welfare, health and safety. Furthermore, Imperial anticipates shut-in activities would consume approximately 1.2M liters of diesel. This significant volume would place additional challenges on the already constrained diesel supply in the Town of Norman Wells.

¹ [Imperial’s Water Licence S13L1-007 60-Day Renewal Application – January 7, 2025](#)

² [Board-Initiated Water Licence Renewal Proceeding in the Public Interest – RFD – January 9, 2025](#)



Expedited Board Decision Urgently Requested

Imperial does not wish to shut-in its operation as a result of necessary approvals not being in place. However, Imperial cannot risk delaying the start date of shut-in activities any later than February 14, 2025, due to the potential offences outlined in section 92.01(1) of the MVRMA in the event a license renewal is not in place before March 4, 2025, and water use and waste deposit activities are being conducted without an active licence during shut-in execution. Without a Ministerial approval of the 60-day Licence renewal by February 14, 2025, Imperial will be forced to initiate activities on-site to shut-in production and protect the integrity of all NWO facilities by March 4, 2025. Without providing adequate time to protect the NWO facilities, significant environmental risks will arise, due to potential freeze/split concerns of the facilities, including cross-river flowlines.

Imperial requests the Board to convene a meeting at its earliest convenience to make a decision on the 60-day License renewal application. An expedited decision from the Board and Minister's approval before February 14, 2025, is required to avoid the emergency associated with a February-March shut-in.

Please don't hesitate to reach out if there are any questions.

Sincerely,

Benjamin Fraser,
Norman Wells Environment & Regulatory Technical Lead
Imperial

Cc –

John Gregory, Conventional Oil & Gas Asset Manager, Imperial
Sarah McLaren, Director, Norman Wells Closure, Imperial
Jeff Wilson, Director, Government Relations, Imperial
Nathan Baines, Supervising Counsel, Imperial
Brad Gilmour, Osler, Hoskin & Harcourt LLP
Ramona Sladic, Secretary of the Commission, CER
Lisa Dyer, Director General, CanNor – Northern Projects Management Office
Robert Jenkins, Deputy Minister, Department of Environment and Climate Change, GNWT
Kim Pawley, Crown-Indigenous Relations and Northern Affairs Canada
Mike Roesch, Manager, Resource and Land Management, CIRNAC
Natalie Lippa, Regulatory Specialist, SLWB
Charles McNeely, Chairperson, Sahtu Secretariat Inc.