

Topic	Additional Information Required	MGM Energy Response
Name and Contact Information – Applicant’s Head Office	Confirm that the Certificate of Corporate Registration from the Government of the Northwest Territories on the registry under S12A-001 is still current.	Updated document is enclosed.
Name and Contact Information – Contractors and Sub-contractors	Required prior to start-up.	MGM Energy will provide this information prior to start-up.
Rights and/or Contracts to Support Eligibility	Optional to provide a copy of the Significant Discovery Licence.	Document is available online at: <a href="#">SDL 149 Title</a>
Project Description	4) More information is required to fulfill subsection 19(3) of the MVLUR.5 Provide the following information: a) Confirm if any vegetation clearing is required to reopen the access and if so, the type and amount of vegetation to be cleared and any best	a) No new areas are being cleared. MGM, to the greatest extent possible, will not be clearing the reestablished vegetation to reopen the access. Where vegetation cannot be laid over or covered via winter road, it will be mulched and reused at the end of the project to restrict access on the road, reduce potential erosion and provide organic matter to promote revegetation.  b) All crossings will be as per the access map, the river crossing and 3 additional crossings. • Stream crossings (if required) will be at the most level location possible. • Stream crossings will be at as close to right angles to

	<p>practices for disposal of trees and/or shrubby material.</p> <p>b) Confirm number and location of wetland and watercourse crossings and method and mitigation for the crossing(s).</p>	<p>the banks as possible to minimize disturbance of banks.</p> <ul style="list-style-type: none"> <li>• Snow-fills will be used to prevent damage to stream beds and banks.</li> <li>• Bulldozers and Snow Cat blades will have protective shoes to elevate the blade, leaving some snow cover to protect the vegetative mat and, thereby, reduce the potential for erosion.</li> <li>• Slash or cross-ditches will be utilized to control erosion on slopes (if required – as there will be negligible to no disturbance to existing vegetation this is unlikely to be needed).</li> <li>• If required by Inspector, any disturbed areas will be reseeded with an approved mix immediately and inspected within one full growing season.</li> </ul>
Camp	<p>5) The Board may include a condition in the draft Permit to submit a final camp plan prior to commencement of the winter abandonment activities as per Section 9 of the Guide.</p> <p>6) MGM to clarify Camp site # 1 and Camp site # 2 described in the Application and if a Sleigh Camp is additional. At minimum include camp locations, and typical layout for each camp with estimated number and type of structures, and # personnel associated with each camp.</p>	<p>The staging area and construction campsite as identified south of the Mackenzie River will be used as the primary campsite. A sleigh camp would be used until the camp is established at the campsite. The sleigh camp would be a 25-man camp and the larger situated camp would be a 60-man camp. A potential layout of the situated camp is enclosed.</p>

Roads and Access	7) Provide information about the decommissioning of any roads or access agreements and/or authorizations.	Roads will be built on previous access routes and will be decommissioned at the end of the project via natural forces (spring melt). If vegetation is cleared, it will be placed on the right of way to reduce potential erosion.
Waste Management Plan	<p>8) Revise the Waste Management Plan to include the following information as outlined in the MVLWB Guidelines for Developing a Waste Management Plan:6</p> <p>a) Clarify “completion fluids” in the context of the Project. In the introductory letter for the applications, MGM states that “the new applications do not include drilling or completions activities”. Yet, Table 4: Discharge Streams and Table 5: Anticipated Waste Generation both include “completions fluids”.</p> <p>b) In Table 4, “Mud Sacks – Drilling” is included. Clarify the use of this material in the Project.</p> <p>c) Identify only the waste streams associated with this Project (abandonment and reclamation) and not previous activities.</p> <p>d) Waste identified in Table 3 to be placed under the appropriate categories identified in Table 5.</p>	<p>a) Completion fluid in this context is used to describe the water based fluid that will be used to condition the wellbore as part of the abandonment operation. Generally speaking, all entries into a wellbore require a fluid maintain pressure control of the wellbore, completion fluid is used with abandonment because the same rig (a service rig is used).</p> <p>b) Mud sacks is a generic term used for well bore fluid additives and how they are stored (in sacks). Materials are added to the water-based system to change the weight of the fluid and to help resolve any wellbore issues encountered. The fluid system is regulated and reviewed by OROGO as the technical regulator. All fluids will be disposed of outside of the NWT. The reference to drilling has been removed.</p> <p>c) All wastes listed could be created in the abandonment project.</p> <p>d) See updated document.</p> <p>e) Turkey management refers to a service provider who can provide all aspects of a given tasks. In terms of waste management this would include providing appropriate equipment, mobilization of equipment, sorting of waste (as required), transportation of waste to appropriate identified destination and demobilization of equipment. This can also be referred to as a one stop shop. All contractors are required to follow project authorizations and management plans.</p> <p>f) Road construction and pad construction will be low impact and clearing to the extent possible will be avoided. If clearing takes place the materials will be reused for erosion control and/or organic material.</p> <p>g) MGM is agreeable to this condition</p>

	<p>e) Under the Disposal column, “Turnkey management” is frequently used: MGM to provide a definition of this term</p> <p>f) In the Land Use application form, under Waste Management brush and trees, MGM refers to the Waste Management Plan. The Plan does not include any information on brush and trees. Will there be any clearing associated with the project along access routes (possible regrowth) and how will MGM deal with the woody debris?</p> <p>g) The Board may include a condition in the permit requiring the submission of an updated WMP 90 days prior to commencement of the winter abandonment project. Off-Site</p>	
Camp	<p>9) If not provided in advance of the Permit issuance (preferred), the Board may include a condition in the Permit for submitting to the Board, prior to the commencement of abandonment activities,</p>	<p>Final disposal facilities will be determined closer to project execution. These facilities are outside of the NWT and outside the jurisdiction of the SLWB.</p>

	<p>written confirmation (e.g., an email, letter, etc.) from the facility/facilities indicating they will accept the waste and their Licence permits it.</p>	
Fuels	<p>10) On the Application form, quantity of fuel is expressed in gallons and 400-barrel tanks. The remainder of the Licence and Permit Application documents use litres. Add the conversion of gallons and barrels to litres on the application forms and reconcile any differences in fuel quantities in different components of the application.</p>	<p>There are approximately 158 litres in a barrel. There are 3.78 litres in a gallon. The application form asks for the capacity of the containers and type of containers. The attachment information was to provide total volumes. Container capacity exceeds project volumes as not all containers will be filled to capacity, fuel will be stored in different locations (camp and well site) and contingency storage capacity is required due to remoteness of the project.</p>
Spill Contingency Plan	<p>11) To ensure completeness of information and readability of the document MGM is strongly encouraged to review this document using the template provided in the INAC Guidelines for Spill Contingency Planning.7 As an example, the Safety Data Sheets (SDS) are included in the middle of the Spill Contingency Plan,</p>	<p>11. All MGM /Paramount spill plans for the NWT are structured in the same way, consistency of documents is important across project areas. 12. a) see above b) Abandonment operations are part of the Drilling/Completions group, thus they follow the same protocols c) MGM/Paramount have had numerous Spill Contingency Plans approved that contain the same information and structure.</p>

	<p>disrupting the flow of this document.</p> <p>12) Revise the Spill Contingency Plan to include the following information:</p> <p>a) Place SDS at end of the document. b) Clarify if the “Incident Notification Protocol” for Drilling / Completions is relevant to this Project and include if it is or exclude if it is not.</p> <p>c) Ensure all relevant sections from the INAC Guidelines are included in the Spill Contingency Plan</p>	
<p>Preliminary Screening Exemption</p>	<p>13) A copy of the July 2012 Preliminary Environmental Screening for S12A-001 and S12L1-001 was included in the Application Package. Revise to clarify if an exemption from preliminary screening is being requested, with supporting rationale,</p> <p>OR</p> <p>14) Please confirm if MGM is requesting exemption of parts of the Project from Preliminary Screening, and if</p>	<p>14) MGM is requesting exemption from preliminary screening. All project components and activities were contemplated under the original approvals. Abandonment could have happened under the original permit and licence if the well had been unsuccessful.</p>

	<p>so, confirm the anticipated new activities that may not have been previously screened and for which additional information on Impacts and Mitigation has been submitted as required.</p>	
<p>Potential Environmental Impacts of the Project and Proposed Mitigation</p>	<p>15) Board Staff have identified inconsistencies between the potential impacts and proposed mitigation measures in the Application Documents Impact-Mitigation Tables and the Environmental Protection Plan (EPP) June 2022: I-78 Well Abandonment Program that includes section 2.0 Hazard Review and Appendix 1: Fundamental Mitigation. Review. Review the latter two documents and update/revise the Application Impact-Mitigation Tables.</p> <p>16) Consider potential impacts during watercourse crossings along</p>	<p>15. MGM understands that in addition to the EPP mitigation measures the Permit and Licence conditions will provide additional mitigations and requirements.</p> <p>16. Water crossings are considered in the EPP. Additionally, MGM expects to receive and adhere to the standard winter crossing conditions in the Land Use Permit and Water Licence. Part F of the prior Water Licence (S12L1-001) and 26 (1) (F) of S12A-001.</p>

Closure and Reclamation Plan / Information

access routes, as well as during water withdrawal. Many of the Boards Standard Permit Conditions may apply.

17) Board Staff acknowledge that the Project is for Closure and Reclamation stating that the application itself is the Plan. The Board does not agree with this interpretation. The Board prefers that remediation, closure and reclamation plans be developed by the Applicant and in consultation with stakeholders if required for some components (e.g. as for the sump remediation options analysis for the Colville Lake wellsites under A19A-004/S19L1-003).

18) Board staff advises MGM to prepare a stand-alone Closure and Reclamation Plan (CRP) for Board approval, referring to section 2.2 of the MVLWB/AANDC Guidelines for the Closure and Reclamation of Advanced Mineral Exploration and Mine Sites in the Northwest Territories<sup>8</sup> for general

A Closure and Reclamation Plan is enclosed. MGM Energy would take this opportunity to point out that using guidelines developed for another industry leads to inappropriate expectations and disconnects between the actual scope of work and the guidelines being used. Large sections of the referenced guidelines do not pertain to oil and gas sites. Including, but not limited to, 3.1.2, 3.2, 3.2.1, 3.3.1, 3.3.2, 3.3.3, 3.3.4, 3.3.6.



direction and contents of a CRP.

19) In general, the required elements of a CRP include:

- Closure objectives for each project component (e.g. sumps, wellbores, pads, access roads, etc.) and overall.
- Closure criteria (e.g. CCME Guidelines; % vegetation cover, no invasive species, etc.).
- Describe in detail all required closure activities for each component, with a list of closure options for each.
- Describe any Engagement related to the development of the CRP or selection of Closure Options.
- Include a Schedule of final identified closure activities, for each component through the life of the Project and any post-closure monitoring, if required.
- Reference to pre-reclamation photographs. The Pre-Site Photos included in the Application detail pre-disturbance site conditions and can be referred to for

<p>Closure Cost Estimate</p>	<p>meeting overall Closure Objective – to return site to pre-development conditions.</p> <ul style="list-style-type: none"> <li>• Post-closure monitoring and maintenance programs.</li> </ul> <p>The 2020 Environmental Site Monitoring Report included in the Application plus any other monitoring reports completed over the years demonstrate the progressive reclamation and status of all wellsite components (wellhead, sumps, campsites or laydown areas, etc..).</p> <p>20) The Closure and Reclamation Plan (CRP) may be submitted as an Interim Plan (ICRP) with conditions in the draft permit that will require submission of a final CRP following MGM’s proposed consultation with stakeholders and following completion of the abandonment program.</p> <p>21) Board staff note that a Closure Cost Estimate was not submitted because MGM stated that the existing securities held under the expired authorizations: S12A-001 with \$234,423.00, and S12L1-001 with \$553,579.00</p>	<div data-bbox="787 186 1911 1112" style="border: 1px solid black; height: 570px; width: 540px;"></div> <p>See enclosed cost estimate. The split of security should be on a similar percentage basis as the 2012 LUP and WL (1/3 Land, 2/3 Water).</p>
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Engagement	<p>should be sufficient for this project.</p> <p>22) Attach a Closure Cost Estimate in the Application Package to verify that current securities are adequate. Applicants are strongly encouraged to use the attached RECLAIM template and supporting guidance document. If an alternative method is proposed, refer to section 2.2 of the MVLWB/INAC/GNWT Guidelines for Closure and Reclamation Cost Estimates for Mines.<sup>9</sup></p> <p>23) Provide a breakdown of the Closure Cost Estimate into the water- and land-related activities and liabilities.</p> <p>24) Revise the Engagement Record and Plan to include the following information as outlined in the MVLWB Engagement Guidelines for Applicants and Holders of Water Licences and Land Use Permits<sup>10</sup>:</p> <p>a) Include in the Engagement Record the two pre-application notifications sent</p>	<div data-bbox="785 190 1911 976" style="border: 1px solid black; height: 484px; width: 536px;"></div> <p>The February notification was sent in 2022, the 2021 reference is an error. The notifications are enclosed with this submission. Economic opportunities are noted in several Log entries and were noted in the project notifications. Table 5 of the Engagement Plan outlines activities requiring engagement.</p>
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	<p>on February 11, 2021 and August 12, 2021.</p> <p>b) Include any records of discussions with stakeholders regarding socioeconomic opportunities such as contracting and employment.</p> <p>c) Include triggers for Engagement through the life of the Project and describe when and what type of engagement is planned.</p>	
Land Use Planning	<p>25) Include a Land Use Plan Conformity Table in the Application Package, demonstrating how the proposed project (no longer considered a legacy land use) meets the requirements of the Sahtu Land Use Plan (SLUP) that was enacted in August of 2013. Since the applications are required in order to complete cleanup and reclamation of project activities (section 2.5 F), the Project is exempt from Conformity Requirement (CR) #1 – Land Use Zoning but must demonstrate conformity with the remaining CRs in the SLUP. This will include CRs #2-13.</p>	See attached

Table 2: Water Licence Application Additional Information Required	Various	See answers above and attached documents.
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