

## Reviewer Comments and Proponent Responses

Project: Norman Wells Goose to Bear Island FI File Number: S24A-005

Board: Sahtu Land and Water Board                      Review Comments Due: September 24, 2024

Proponent: Imperial Oil Resources N.W.T. Limi Proponent Responses Due: October 1, 2024

**September 25, 2024 Update: The Sahtú Secretariat Inc. (SSI) is referring the Norman Wells Goose to Bear Island Flowline Replacement Project to Environmental Assessment (EA), as outlined in the September 24, 2024 letter to the Mackenzie Valley Review Board. The SLWB regulatory process is suspended as of September 25, 2024. The process will resume following the completion of the EA.**

Organization	ID	Topic	Reviewer Comment	Reviewer Recommendation
CIRNAC (Yellowknife) - Megan Larose	1	Draft Permit Conditions	Draft Land Use Permit Condition 2 and Condition 19: The contact information for the CIRNAC Inspector is 867 669- 2442.	None

<p>CIRNAC (Yellowknife) - Megan Larose</p>	<p>2</p>	<p>Draft Permit Conditions</p>	<p>Draft Land Use Permit Condition 5: As part of the application review, CIRNAC - Resource and Land Management (RLM) requested confirmation from Imperial that the equipment listed in Section 12 of the land use permit application was accurate. Imperial responded "Imperial will continue to review this list as engineering and project planning work continues and as contractors are selected to ensure it is accurate and updated." It remains unclear if Section 12 the land use permit application is an accurate listing of the equipment necessary for the line 490 replacement. CIRNAC-RLM would like to see a finalized list of equipment required to carry out the project prior to commencement of land use activities.</p>	<p>It is recommended that Condition 5 include the following addition: The Permittee shall only use equipment of a similar type, size, and number to that listed in the complete application. <i>The Permittee will confirm the equipment requirements prior to commencement of land use activities.</i></p>
<p>CIRNAC (Yellowknife) - Megan Larose</p>	<p>3</p>	<p>Draft Permit Conditions</p>	<p>Draft Land Use Permit Condition 26 Fuel volume: The land use permit application refers to use of a 5,000 litre diesel storage tank at the entry site (Bear Island). CIRNAC - RLM suggest including 5,000 litres as the maximum volume of fuel to be stored on site at any time.</p>	<p>It is recommended that Condition 26 include the following: The Permittee shall have a maximum of 5,000 litres of fuel stored on the land use site at any time, unless otherwise approved by the Board.</p>

CIRNAC (Yellowknife) - Megan Larose	4	Draft Licence Conditions	Draft Water Licence Part B Draft Condition 9: Annual Review Date CIRNAC-RLM suggest that the annual review of management plans occur at the same time as the annual water licence report in Part B Condition 16.	CIRNAC-RLM suggest that the annual managment plan review occur at the same time as the annual water licence report in Part B Condition 16.
CIRNAC (Yellowknife) - Megan Larose	5	Draft Licence Conditions	Draft Water Licence Part B Draft Condition 16: annual water licence report CIRNAC-RLM suggest that submission of the annual water licence report be required November 1, 2025 and every November 1 thereafter.	CIRNAC-RLM suggest that submission of the annual water licence report be required November 1, 2025 and every November 1 thereafter.
CIRNAC (Yellowknife) - Megan Larose	6	Draft Permit Conditions	Draft Condition 20 Security Deposit: It is understood that the line 490 replacement will become part of the Norman Wells Operation infrastructure and will be incorporated into the closure and reclamation plans for the site. As such, security for the Norman Wells Operation, held under water licence S13L1-007, is meant to be sufficient to cover the line 490 activities. Based on this, CIRNAC-RLM is agreeable to a security deposit in the amount of \$0	Suggest Land Use Permit Condition 20 include the following: Prior to the commencement of the land-use operation, the Permittee shall deposit with the Minister a security deposit in the amount of \$0.

<p>CIRNAC (Yellowknife) - Megan Larose</p>	<p>7</p>	<p>Draft Licence Conditions</p>	<p>Draft Water Licence Part E Construction Draft Condition 3: minor edit - missing word Suggest the addition of the word "<i>Structure(s)</i>" to part E Condition 3 so that it reads "A minimum of 90 days prior to the commencement of Construction of any Engineered <i>Structure(s)</i>, the Licensee shall submit to the Board, Design Drawings stamped and signed by a Professional Engineer.</p>	<p>Suggest that Part E Condition 3 be revised as follows: A minimum of 90 days prior to the commencement of Construction of any Engineered <i>Structure(s)</i>, the Licensee shall submit to the Board, Design Drawings stamped and signed by a Professional Engineer.</p>
<p>CIRNAC (Yellowknife) - Megan Larose</p>	<p>8</p>	<p>Draft Licence Conditions</p>	<p>Draft Water Licence Part C Condition 1 and Schedule 2: Security: It is understood that the line 490 replacement will become part of the Norman Wells Operation infrastructure and will be incorporated into the closure and reclamation plans for the site. As such, security for the Norman Wells Operation, held under water licence S13L1-007, is meant to be sufficient to cover the line 490 activities. Based on this, CIRNAC-RLM is agreeable to a security deposit in the amount of \$0.</p>	<p>Schedule 2 of the Water Licence to include the following: The amount of security referred to in Part C, Condition 1 (POST SECURITY DEPOSIT), shall total \$0.</p>

CIRNAC (Yellowknife) - Megan Larose	9	Draft Licence Conditions	Draft Water Licence Part H Spill Contingency Planning Condition 6 Material Storage Ordinary High-Water Mark: to be consistent with draft land use permit Condition 23, it is suggested that Part H condition 6 be revised to include flexibility for storage within 100 metres of the ordinary high- water mark with inspector authorization.	Recommend that Part H Condition 6 be revised as follows: The Licensee shall not establish any fuel storage facilities or refueling stations, or store chemicals or Wastes within 100 metres of the Ordinary High-Water Mark of any Watercourse, <i>unless otherwise authorized in writing by an Inspector.</i>
GNWT-ECC - Environmental Regulatory Analyst	1	<b>GNWT-ECC Cover Letter</b>	The Department of Environment and Climate Change, Government of the Northwest Territories has reviewed the application at reference based on its mandated responsibilities under the <i>Waters Act</i> and has provided comments and recommendations for consideration of the Sahtu Land and Water Board. For any technical questions, please contact Celena Hoeve, Regulatory and Science Advisor with the Regulatory and Permitting Division at <a href="mailto:Celena.Hoeve@gov.nt.ca">Celena.Hoeve@gov.nt.ca</a> .  Should you have any general questions or concerns, please do not hesitate to contact <a href="mailto:gnwt_ea@gov.nt.ca">gnwt_ea@gov.nt.ca</a> .	N/A

GNWT-ECC - Environmental Regulatory Analyst	2	<b>Minister Definition</b>	The definition of “Minister” refers to the Minister of Environment and Natural Resources (ENR). On April 1st, 2023, the Government of the Northwest Territories (GNWT) Departments of Lands and ENR merged to form the Department of Environment and Climate Change (ECC).	GNWT-ECC recommends that the definition of “Minister” be updated to refer to the Minister of ECC.
Kasho Gotine Community Council - K'ásho Got'İneę - Collin Pierrot	1	Draft Licence Conditions	KGC Letter to SLWB on draft WL/LUP conditions	See letter attached.