INUVIALUIT SIVUNNIUQPAIT IMAKKUN

INUVIALUIT WATER BOARD

August 21, 2026

Kyle Thompson
Senior Program Manager
Shell Canada Limited
Suite 4000, 500 Centre Street SE
Calgary, Alberta T2G 1A6

Dear Mr. Thompson:

Re: N5L8-1849 Shell Canada Limited, Water Licence Application - Environmental Site Assessment at former Well Sites: Ikhil I-37 and Reindeer C-36, East-Central Mackenzie Delta, Inuvialuit Settlement Region, Northwest Territories

The Inuvialuit Water Board (IWB) acknowledges receipt of the water licence application package for the Environmental Site Assessments at former Well sites: Ikhil I-37 and Reindeer C-36, East-Central Mackenzie Delta - Inuvialuit Settlement Region (ISR), Northwest Territories (NWT) on August 4, 2026. The IWB has completed an initial review of the application package and as a result requires additional information and / or clarification to consider the application complete.

Please provide the following additional information and / or clarification to enable the IWB to proceed with the water licence application review and comment process:

A. Project Description (PD):

1. Page 7, Section 5.3.1 states: "No temporary camp will be established at the Sites and accommodations will be provided in Inuvik or at a temporary, self-contained camp permitted and established at Camp Farewell (EISC Registry File: [04/25-06]), or at a temporary, self-contained camp permitted and potentially established on the river ice in the north-central Mackenzie Delta (EISC Registry File: [10/24-04]) for similar work in the ISR". The Water Licence Application submission cover letter and Schedule C, Section 4, indicate that the well sites Ikhil I-37 and Reindeer C-36 are in the east-central Mackenzie Delta. However, the location of the temporary camp potentially to be established on river ice is indicated as being in the north-central Mackenzie Delta. Please clarify this discrepancy. Provide a map indicating location of a temporary, self-contained camp to be established at Camp Farewell and on river ice in the north-central Mackenzie Delta, including Global Positioning System (GPS) coordinates (latitude and longitude) in Degrees, Minutes, Seconds (DMS). Note: Due to potential inconsistencies among individual GPS units, it is recommended to use Google Earth latitude and longitude values as the GPS points.

2. Page 21, Section 6.4.2.5, Paragraph 4, Line 11 states: "The construction of the snowpack ramps and temporary overland winter access (including watercourse crossings) will use approximately 200 cubic metres (m^3) of water per day, will at no time exceed 299 m^3 per day and the water requirement will be for a duration of approximately six to eight weeks each winter". The water intake location map is not included in Appendix A. Please provide a map depicting the name and GPS coordinates (latitude and longitude), in DMS, for each intake associated with the water sources from which water is to be withdrawn.

B. Waste Management Plan (WMP)

1. Page 5, Section 3.1 states: "Construction materials and other non-hazardous waste will be stored temporarily at the Sites and will be transported from the Sites daily during the summer field programs and periodically during the winter field programs and disposed of at an approved landfill facility (e.g., Inuvik)". During the winter field season, the transportation of waste to an approved waste disposal facility is indicated as occurring "periodically". Please specify the frequency of waste transportation during the winter field season (e.g., daily, weekly or monthly), as the term "periodically" does not provide a specific frequency.

2. Project Description, Page 7, Section 5.3.1, and Spill Contingency Plan, Page 17, Section 6.4, Paragraph 3, indicate that temporary off-site camps may be established at Camp Farewell and on the river ice in the north-central Mackenzie Delta. Please provide the following details regarding these off-site camps, under Sections 3.1 and 3.2 of the Waste Management Plan (Pages 5 and 6), including, but not limited to:
    - Location of each off-site camp (i.e., Camp Farewell and on the river ice) including GPS coordinates (latitude and longitude) in DMS;
    - Number of people anticipated to be accommodated at each off-site camp;
    - Anticipated quantity of sewage (toilet waste + greywater) generated per day and total days for camps duration; and
    - Frequency (e.g., daily, weekly, monthly) and location of sewage transfer and disposal at an approved waste disposal facility.

3. Page 5, Table B details the anticipated waste streams during the winter stage of the project. Please clarify whether the "anticipated volume" of "Non-recyclable domestic wastes (organic and non-organic)" and "Recyclable domestic wastes" includes waste generated at the off-site camps (i.e., the temporary camp at Camp Farewell and the temporary camp on the river ice in the north-central Mackenzie Delta). If not, please include the anticipated volumes of waste from these camps in Table B.

C. Spill Contingency Plan (SCP):

1. Indicate the following features on Figure 2 or, alternatively, add them to a separate figure (Figure 3) under Appendix A:
    - The name and direction of flow of the river on which the ice road will be constructed to access Ikhil I-37 and Reindeer C-36 sites.
    - Storage locations for each hazardous material.
    - Probable / potential spill locations and direction of flow on land and in water;
    - Locations of all emergency and spill response equipment.
    - Any other important on-site features.
    - Indicate the locations of the off-site camps at Camp Farewell and the self-contained camp potentially to be established on the river ice in the north-central Mackenzie Delta, as described in the Project Description, Page 7, Section 5.3.1, including GPS coordinates (latitude and longitude) in DMS. Note: Due to potential inconsistencies among individual GPS units, it is recommended to utilize Google Earth latitude and longitude as the GPS points.
    - Indicate the proposed locations of the Pacto waterless toilets (or equivalent) for the warming trailer at the Site, as described in the SCP, Page 7, Section 2.2, including GPS coordinates (latitude and longitude) in DMS.

2. Page 5, Section 2.0, Table B provides a summary of Hazardous Materials Stored and Used on site during all Stages of the Project. For clarity, please include the number of storage units for each "Storage Type" in Table B Column 2. For example, Column 3 indicates a storage capacity of "20 L each" for jerry cans but does not specify the number of jerry cans in Column 2. Similarly, the number of slip tanks and pails / jugs should be specified. The number of storage units and the storage capacity for each storage type are necessary to determine the maximum quantity of hazardous materials that may be stored and used on Site and to assess potential spill volumes (i.e., the worst-case spill scenario).

3. Page 5, Section 2.0, Table B: Please include the "Storage Type," "Storage Capacity," and "Location Description" for anticipated sewage (toilet wastes and greywater) generation and storage at the temporary off-site camps proposed at Camp Farewell and on the river ice in the north-central Mackenzie Delta, as described in the Project Description, Page 7, Section 5.3.1.

4. Page 7, under Section 2.2 - include a description of the worst-case sewage spill scenarios associated with Pacto waterless toilets (or equivalent) and for the temporary camps at Camp Farewell and on the river ice in the north-central Mackenzie Delta.

5. Page 8, Section 3.2, Table C indicates "Contact" and "Phone Number" for the "Site Supervisor" as "TBD". If the Site Supervisor's contact name and telephone number are known at this time, please update Table C accordingly.

6. Page 17, Section 6.4, Paragraph 3 states: "Sewage generated at the off-site camps will be under separate Environmental Impact Screening Committee Files (Registry File: [04/25-06], [10/24-04])". Please clarify whether the term "off-site camps" referenced on Page 17, Section 6.4, Paragraph 3 refer to the camps at Camp Farewell and a temporary camp on the river ice in the north-central Mackenzie Delta, as described in the Project Description, Page 7, Section 5.3.1? Please provide details for each off-site camp, including, but not limited to:
    - Location map, including GPS coordinates (latitude and longitude) in DMS;
    - Number of people anticipated to be accommodated at each off-site camp;
    - Anticipated daily quantity of sewage (toilet wastes + greywater) generation; and
    - Procedures for the transfer and disposal of sewage to an approved Waste Disposal Facility.

D. Emergency Response Plan (ERP)

1. Page 2, Section 1.1, Paragraph 2 states: "A final version of this ERP will be submitted prior to mobilization". Similarly, Page 10, Section 4.1, Table C - WSP Emergency Contact identifies the "Name" and "Number" as "TBD," with Footnote "b" stating: "Note that a final version of the ERP will be submitted prior to mobilization". If information is available at this time, complete Table C, if not, provide a specific timeline for the submission of the final ERP (For example: 30 days prior to mobilization).

2. Page 23, Figure D - Spill Response Flowchart: The Spill Response Flowchart presented in Figure D is configured differently from the Spill Response Flowchart presented in the Spill Contingency Plan (SCP), Page 10, Figure A. Please clarify why the Spill Response Flowchart in the Emergency Response Plan (ERP), Page 23, Figure D, differs from the flowchart provided in the Spill Contingency Plan (SCP), Page 10, Figure A. The use of two different Spill Response Flowcharts may cause confusion during the implementation of spill response procedures in the event of a spill. The flowchart presented in the SCP is clearer and easier to understand than the flowchart presented in the ERP. Please

consider revising the flowcharts in ERP to ensure consistency between the ERP and SCP and to facilitate clear and effective implementation of spill response procedures.

E. As per the Inuvialuit Final Agreement (IFA), Section 11, all projects are required to undergo the Environmental Impact Screening Committee (EISC) process. The Inuvialuit Water Board (IWB) requires the EISC decision letter before making a decision on the water licence application. Please submit the EISC decision letter to the IWB. If the EISC decision letter is not currently available, please provide a specific timeline for when the EISC decision letter will be submitted to the IWB.

As per the IWB document submission standards, submit two (2) hard copies and two (2) electronic copies (USBs) of the requested additional information and / or clarifications (A to E), including a cover letter and a summary table indicating how and where (e.g. page and section numbers) the requested information is addressed. This will assist the IWB with the continuation of processing your water licence application in a timely manner.

The submitted documents, including all related IWB correspondence, will be placed on the IWB Public Register. Should you have any questions regarding this correspondence, contact me at 867-678-8610 or adhikarib@inuvwb.ca or Mardy Semmler, Executive Director, at 867-678-8609 or semmlerm@inuvwb.ca.

Sincerely,



Bijaya Adhikari, PhD
Science and Regulatory Coordinator