



January 23, 2026

Terence Hughes
Regulatory and Community Affairs Advisor
MGM Energy
Suite 4700, 888 3rd Street S.W.
Calgary, Alberta T2P 5C5

Dear Mr. Hughes:

RE: N5L1-1845 MGM Energy – Updated Water Licence Application Package - Well Abandonment Program - Langley K-30, Langley E-07 and Kumak I-25, Mackenzie Delta, Inuvialuit Settlement Region (ISR)

The Inuvialuit Water Board (IWB) acknowledges receipt of the updated Water Licence Application package, submitted on December 31, 2025 by MGM Energy in response to the IWB's additional information request dated September 28, 2023 for the Well Abandonment Program for Langley K-30, Langley E-07, and Kumak I-25 in the Mackenzie Delta, Inuvialuit Settlement Region (ISR), Northwest Territories. The IWB has completed an internal review of the updated Water Licence Application package and, as a result, requires additional information and / or clarification to continue with the water licence application process. Please provide the following additional information and / or clarification to continue with the processing of the Water Licence Application Package:

A. Water Licence Application - Schedule C:

1. In response to the IWB's request for additional information dated September 28, 2023 (Item 8, Schedule C - Section 13), MGM indicates that "Applicant has signed the Water Licence Application prior to submission", however, the applicant has not signed the application. The application must be signed by the applicant to make it valid.
2. Section 13 - Indicates "Date: December 3, 2025". The Applicant must sign and date the signed application.

B. Application and Water Use Fees

1. IWB received two cheques, the first cheque in September 2023 in the amount of \$8,338.60 and the second cheque in October 2023 in the amount of \$2,261.40 which were for the water licence application and water use fees, totalling \$10,600.00. Both cheques were made payable to the Government of the Northwest Territories (GNWT) – Petroleum Resources Division, Department of Industry, Tourism and Investment (ITI). The cheques for the water licence application fee and water use fees should have been made payable to the GNWT Finance (see IWB website: <https://www.inuvwb.ca/applications/procedure/>). The cheques were returned to MGM Energy on October 16, 2023 and included a cover letter indicating the proper GNWT department to make the cheques payable to (Finance). The updated water licence application package, submitted by MGM Energy on December 31, 2025 does not include the cheques for the water licence application fee and water use fees.

If the application fee (\$30.00) and the water use fees have been paid directly to the GNWT Department of Finance, provide a receipt for the IWB Public Register. If not, submit a cheque payable to the **GNWT Department of Finance** in the amount of \$30.00 for the water licence application fee and include the water use fees for the first years water use requested. These cheques can be submitted, with the updated water licence application package. For the water use fee amount use the Water Use Fee Calculator available on the IWB's website (<https://www.inuvwb.ca/applications/procedure/>); including a copy of the water use fee calculation with the updated application package.

C. Project Description (PD):

1. Page xi, Content Item 15, and Page 15-1, Section 15, indicate "Emergency Response Plan." Text under Section 15 states, "A copy of the Emergency Response Plan is provided in Appendix A". However, Appendix A includes a "Spill Contingency Plan". Please clarify these discrepancies.
2. Appendix B, ECC 2005 Bear Encounter Response Guidelines for Oil and Gas Programs - information under Section III, Contact and Response Personnel may be outdated (i.e., name and updated contact numbers).
Contact GNWT Environment and Climate Change (ECC) Beaufort Delta Regional Office in Inuvik (<https://www.gov.nt.ca/ecc/en/regional-offices>) - Wildlife and Forestry at 1-867-678-8091 ext. 53661 to verify whether the "Contact" and "Response Personnel" information in Appendix B, Section III are valid. If the information is outdated, include updated contact information under Appendix B. Up-to-date contact information is essential for reporting human-wildlife incidents.
3. Appendix A includes the Spill Contingency Plan, including the MSDS. Additionally, MSDS is included again under Appendix F. Please clarify these duplications.
4. Appendix A includes the "Spill Contingency Plan." Additionally, the Spill Contingency Plan is included again at the end of the water licence application package, after the "Erosion and Sediment Control Plan." Please clarify these duplications.
5. Page 11-1, Section 11 includes a description for the Community Consultation, and Appendix D includes consultation records for June 20 – 22, 2018; August 27 – 30, 2018; and September 17, 2018. Additionally, the IWB received a document titled "Stakeholder Engagement Package, Inuvialuit Settlement Region Well Abandonments, November 2025" via email on November 21, 2025. Are there any questions or concerns from communities (ISR and Inuvik HTCs and CCs) regarding the Stakeholder Engagement Package which was circulated via email on November 21, 2025? If MGM received any questions or concerns from communities, submit detailed consultation records to the IWB, including MGM's response.

D. Spill Contingency Plan (SCP):

1. Page 3, Section 1.6, Table 1.2, Row 4 indicates "Government of Northwest Territories (GNWT) - Environment and Natural Resources". The table requires updating to reflect the new department of GNWT Department of Environment and Climate Change (ECC) – the merger of GNWT ENR and Lands on April 1, 2023.
2. In response to the IWB additional information request, Item 5, MGM indicates that, "...A detailed list of the equipment available to MGM for spill response is provided in Appendix F of the SCP...". However, Appendix F does not include a list of communication equipment available to MGM, it includes the MSDS forms. Please clarify this discrepancy.

3. Page 14, Section 3.5.1, Table 3.6, row 4, column 1 - indicates "NWT Department of Environment and Natural Resources". Replace with the Department of Environment and Climate Change (ECC).

E. Environmental Protection Plan (EPP):

1. In response to the IWB Additional Information Request, Item 2, MGM provided the following response: "Section 1.1 NEB has been replaced with CER". However, in the EPP text under section 1.1, it still reads: "...with National Energy Board (NEB) requirements." Please update these documents.

Note: The National Energy Board (NEB) was replaced by the Canada Energy Regulator (CER) (<https://www.cer-rec.gc.ca/en/index.html>).

F. Waste Management Plan (WMP):

1. In response to the IWB additional information request dated September 28, 2023, Item 5, MGM states: "Program maps are provided in Appendix A of the WMP." The maps indicate only wellsite locations and GPS coordinates. Appendix A - program maps do not depict the locations and GPS coordinates of camps (e.g., sleigh camps, wellsite camps, barge camps, etc.). If camp locations, including GPS coordinates, are not available at this time, specify the timeline (e.g., 30 days prior to conducting site activities) for the submission of an updated WMP to the IWB.
2. In response to the IWB request for additional information dated September 28, 2023 - Items 5, 8, 9, 11, 12, and 13 (i, ii, and iv-xi) - MGM indicates that the information requested by the IWB on September 28, 2023, is not available at this time. Once the requested information becomes available, the Waste Management Plan (WMP) will be updated and submitted to the IWB prior to construction. Please specify the timeline (e.g., 30 days prior to initiating project activities) for submission of the updated WMP to the IWB.

G. Closure, Reclamation and Monitoring Plan (CRMP):

1. Cover Page - Replace "Department of Lands – Government of Northwest Territories (GNWT)" with "Submitted to the Inuvialuit Water Board".
Note the former GNWT Department of Lands (DoL) and Department of Environment and Natural Resources (ENR) are now the Department of Environment and Climate Change (ECC).
2. Table of Contents, Page iii, Appendix A, Figures A.7 and A.8 and attached Figures A.7 and A.8, Figure Titles indicate that " Figure A.7: Unipkat M-45 / Kumak I-25 Wellsite Area – Water and Soil Sampling Locations", and "Figure A.8: Unipkat M-45 /Kumak I-25 Sump Area - Water and Soil Sample Locations".
According to the information provided in the Water Licence Application (Schedule C), Sections 3 and 4, throughout the Project Description, and in the "Purpose and Scope" of the CRMP (Page 2, Section 2), the Unipkat M-45 wellsite area is not included, and not part of the scope of the project description. Please clarify these discrepancies and update the "Table of Contents - Appendix A" and the attached "Figure Title" to ensure consistency with project scope.
3. Page 19, Section 5.1, Paragraph 3, line 8 states "...there are no contaminants of concern present...". Please specify "Contaminants of Potential Concerns (CoPC)" under this section in tabular form including Pb, Hg, Mn, Polycyclic Aromatic Hydrocarbons (PAHs), Total Petroleum Hydrocarbons (TPH), BTEX (benzene, toluene, ethylbenzene, and xylene) etc.
4. Page 22, Table 5.1, indicates "Ice Road". Project Description Page 6-9, Table 6-2, Note 2 clarifies that "Ice road / Ice pad construction" means winter road (on land) /

- ice pad construction". For clarity and to be consistent with the terminology used in "GNWT - Northern Land use Guideline (Page 6, Table 2-1), replace "Ice roads" with "Winter Roads (on land)".
5. Page 26, Section 5.6.2.2, line 8 indicates "...residual parameters of concern...". Please specify what are the potential residual parameters of concern?
 6. Page 27, Section 5.6.3, Paragraph 1, states: "...replaced with compatible backfill sources from Inuvik, NT". How will it be ensured that backfill sources from Inuvik are free from contaminants such as acid-generating and metal-leaching potential? Will the material be tested before being transported to the site?
 7. Page 28, Section 5.6.4, bullet 3 – replace "NEB" with "CER".
 8. Page 32, Table 5.2, Row 5, Column 2 - Replace "ENR" with "ECC".
 9. Page 30, Table 5.2, Row 3 provides a brief description of "Reduced permafrost integrity" and the associated "Mitigation." Further information is required to understand the impacts on permafrost resulting from excavation and backfilling at the wellhead area and winter road (on land) construction, as well as the proposed mitigation and monitoring measures. Include a Section 10 on page 38 of the CRMP to include information including, but not limited to, the following:
 - a. Permafrost conditions at the site and potential impacts resulting from excavation at the wellhead area and winter road (on land) construction and operation;
 - b. Measures to be implemented to mitigate potential effects on permafrost; and
 - c. Post-closure inspection, monitoring, and reporting activities following completion of the decommissioning of the Langley K-30, Langley E-07, and Kumak I-25 wellheads. Is there a need to install thermistors in backfilled wellhead excavation areas and in undisturbed (background) areas as post-closure permafrost monitoring measures? Please clarify.

H. Erosion and Sediment Control Plan (ESCP):

1. Cover Page - Replace "Department of Lands - Government of Northwest Territories (GNWT)" with "Submission to the Inuvialuit Water Board" or delete this statement.

I. Submission of Electronic Copy (USBs) of Updated WL Application Package

1. The IWB received an empty USB along with the updated water licence application package on December 31, 2025. The submitted USB does not contain any files {USB Drive [D]: 0 items}. MGM must submit two electronic copies (USBs) containing the complete updated application package. It is recommended that MGM copy the complete updated application package onto the USBs and verify their contents before sending them to the IWB. This will ensure that the USBs contain the complete water licence application package including: cover letter, updated Schedule C, Conformity Table in response to the IWB Additional Information Requests, updated Project Description (PD); updated Spill Contingency Plan (SCP); updated Waste Management Plan (WMP); updated Closure, Reclamation, and Monitoring Plan (CRMP); updated Erosion and Sediment Control Plan (ESCP); EISC Decision Letter; and a copy of water use fee calculation obtained by using Water Use Fee Calculator available on IWB website (<https://www.inuvwb.ca/applications/procedure/>).
Note that, in the absence of electronic copies (USBs) of the updated water licence application package, the IWB can not distribute the package to external reviewers, and upload it to the IWB Electronic Public Register.

Please submit **two (2) hard copies** and **two (2) electronic copies (USBs)** of the updated water licence application package, together with a cover letter and a summary table identifying how and where (e.g., page and section numbers) the requested information has been addressed. This will facilitate the timely processing of your water licence application package.

The Inuvialuit Water Board (IWB) Document Submission Standards can be found on the IWB website:

https://www.inuvwb.ca/sites/default/files/200401_iwb_document_submission_standards.pdf

The submitted documentation, 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 by email to adhikarib@inuvwb.ca or Mardy Semmler, Executive Director, at 867-678-8609 or semmlerm@inuvwb.ca.

Sincerely,

A handwritten signature in black ink, appearing to read "Bijaya Adhikari". The signature is written in a cursive style with a prominent initial "B".

Bijaya Adhikari, PhD
Science and Regulatory Coordinator