

Table A. Water Licence Application – Schedule C

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1	N/A	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.		The Water Licence application has been signed and dated.
2	Section 13	Indicates "Date: December 3, 2025". The Applicant must sign and date the signed application.		The Water Licence application has been signed and dated.

Table B. Application and Water Use Fees

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1		<p>WB 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.</p> <p>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.</p>		<p>Cheques for the Water Licence application fee and the water use fees have been submitted with the Water Licence application.</p>

Table C. Project Description

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
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.	Section 15	Appendix A has been removed for duplication and the Project-specific Spill Contingency Plan is included in the Water Licence application. The MGM Emergency Response Plan developed for all winter activities (Section 15) is available on the IWB registry under Water Licence application (N7L1-1822).
2	Appendix B	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.	Executive Summary	Appendix B, ECC 2005 Bear Encounter Response Guidelines for Oil and Gas Programs has been replaced with references to the GNWT-ECC Safety in Polar Bear Country (GNWT-ECC 2024) and GNWT-ECC Safety in Grizzly and Black Bear Country (GNWT-ECC 2018) references.
3	Appendix A	Appendix A includes the Spill Contingency Plan, including the MSDS. Additionally, MSDS is included again under Appendix F. Please clarify these duplications.	Water Licence Application	Appendix A Spill Contingency Plan and Appendix F MSDS has been removed from the Project Description to avoid duplication and is included once in the Water Licence Application.
4	Appendix A	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.	Water Licence Application	Supplementary plans including the Spill Contingency Plan and Erosion and Sediment Control Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
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 HTC 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.	Page 11-1, Section 11	No response to the Stakeholder Engagement Package, Inuvialuit Settlement Region Well Abandonments, November 21, 2025 has been received to date. Section 11 of the PDR has been updated to reflect this, and the engagement package is included in Appendix A of the PDR.

Table D. Spill Contingency Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
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.	Section 1.6, Table 1.2	Table 1.2 has been updated from GNWT-ENR to GNWT-ECC.
2	Appendix F	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.	Page 13, Section 3.5	Communication equipment for reporting spills is included on Page 13, Section 3.5 Spill Response Reporting of the SCP, stating that satellite phones will be available on site and with Project personnel for spill reporting and contacting emergency personnel in the event of a spill.
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).	Page 14, Section 3.5.1, Table 3.6, row 4, column 1	Table 3.6 has been updated from "NWT Department of Environment and Natural Resources" to "NWT Department of Environment and Climate Change".

Table E. Environmental Protection Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1	Section 1.1	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).	Section 1.1	National Energy Board (NEB) has been changed to Canadian Energy Regulator in Section 1.1.

Table F. Waste Management Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1	Appendix A	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.	Appendix A	Locations and GPS coordinates of camps are not available at this time. The WMP, including Appendix A (Program Maps), will be updated with the known locations and submitted to the IWB 30 days prior to construction.
2	Section 3, 3.1, 3.1.1, 3.1.2, 3.2	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.	Section 3, 3.1, 3.1.1, 3.1.2, 3.2	The volumes, rate, waste storage locations, final disposal location, and incineration details (i.e. incineration model, incinerator location, volumes, rate, frequency, disposal location) is not available at this time. The WMP will be updated with this information and submitted to the IWB 30 days prior to construction.

Table G. Closure, Reclamation and Monitoring Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
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).	Cover Page	The Cover Page has replaced "Department of Lands - Government of Northwest Territories (GNWT)" to "Submission to the Inuvialuit Water Board (IWB)".
2	Table of Contents, Page iii, Appendix A, Figures A.7 and A.8	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.	Table of Contents, Page iii, Appendix A, Figures A.7 and A.8	Unipkat M-45 is not included in the scope of the Water Licence application. Unipkat M-45 has been removed from the CRMP for consistency.
3	Page 19, Section 5.1, Paragraph 3, line 8	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.	Page 19, Section 5.1, Paragraph 3, line 8	Contaminants of Potential Concern (COPC) and Containments of Concern (COC) are defined in Section 3.3.
4	Whole document	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 consistence with the terminology used in "GNWT - Northern Land use Guideline (Page 6, Table 2-1), replace "Ice roads" with "Winter Roads (on land)".	Whole document	"Ice roads" have been replaced with "Winter roads" throughout the CRMP for consistency.

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
5	Page 26, Section 5.6.2.2, line 8	Page 26, Section 5.6.2.2, line 8 indicates " .. residual parameters of concern .. ". Please specify what are the potential residual parameters of concern?	Page 26, Section 5.6.2.2, line 8	Wording has been updated to residual COPCs, which are identified in Section 3.3.
6	Page 27, Section 5.6.3, Paragraph 1	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?	Page 27, Section 5.6.3, Paragraph 1	Section 5.6.3 has been updated stating that backfill sources will be tested for chemistry and texture parameters to confirm they are compatible and free of contaminants of concern prior to being used.
7	Page 28, Section 5.6.4, bullet 3	Page 28, Section 5.6.4, bullet 3 - replace "NEB" with "CER".	Page 28, Section 5.6.4, bullet 3	"NEB" has been replaced with "CER".
8	Page 32, Table 5.2, Row 5, Column 2	Page 32, Table 5.2, Row 5, Column 2 - Replace "ENR" with "ECC".	Page 32, Table 5.2, Row 5, Column 2	The flaring guidelines referenced are published by NEB and therefore this inclusion has not been changed to CER.
9	Page 30, Table 5.2, Row 3	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 1-25 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.	Sections 3.2.2, 3.2.3, 3.3.3, 5.10 Section 5.9, Table 5-3	Information regarding permafrost has been updated throughout the report, as needed: Permafrost conditions included in Sections 3.2.2, 3.2.3, and 3.2.4 Additional information regarding the potential effects resulting from excavation at the wellhead area and winter road construction and operation included in Table 5-3. Additional information regarding the potential effects on permafrost included in Table 5-3. Information regarding the post-closure inspection, monitoring, and reporting activities following the completion of decommissioning is included in Section 5.10 Ground temperature monitoring at the excavated wellhead location is not required. The recommended approach is stated in Section 5.10, which consists of vegetation and terrain monitoring, focusing on the physical state, stable ground surface, lack of water ponding, ground cracking, subsidence, and erosion.

Table H. Erosion and Sediment Control Plan

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1	Cover Page	Replace “Department of Lands – Government of Northwest Territories (GNWT)” with “Submission to the Inuvialuit Water Board” or delete this statement.	Cover Page	Cover Page has been updated from ““Department of Lands – Government of Northwest Territories (GNWT)” to “Submission to the Inuvialuit Water Board”.

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

Number	Document Section	Information Needs from IWB Letter	Updated Section	Proponent Response
1	N/A	<p>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 completed 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 the water use fee calculation obtained by using Water Use Fee Calculator available on the IWB website (Procedure).</p> <p>Note that, in absence of the 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.</p>	N/A	Two USBs have been provided with the Water Licence application.