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ENVIRONMENTAL IMPACT SCREENING COMMITTEE

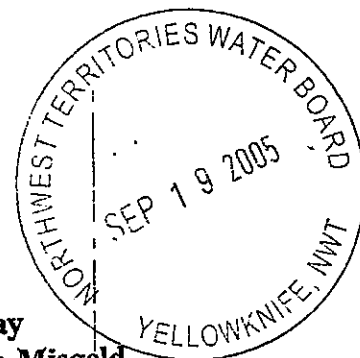
FACSIMILE TRANSMISSION COVER SHEET

DATE OF TRANSMISSION: September 19, 2005

MESSAGE TO:

Randall Warren
Erin Hiebert
Mike Fournier
Tom Andrew
Bruce Hanna
Susan Fleck
Evelyn Storr
James Pokiak

Gordon Wray
Peter Lennie-Misgeld
Shannon Pagotto
Terry Baker
Rudy Cockney
Jason McNeill
Ron Gruben



COMPANY:

Various

FAX NUMBER:

Various

NUMBER OF PAGES:

33

OPERATOR:

Bernice Joe

MESSAGE FROM:

Christine Inglangasuk
eisc@jointsec.nt.ca

ORIGINAL:

TO BE MAILED ☺ NOT TO BE MAILED

MESSAGE:

Project Description for the Type B Water Licence
Renewal for Farewell Camp & Stockpile Site (Camp
Farewell).

PLEASE CONTACT THE JOINT SECRETARIAT IF THE TRANSMISSION IS NOT COMPLETE

The Joint Secretariat – Inuvialuit Renewable Resources Committees

P.O. Box 2120 Inuvik NWT X0E 0T0 Canada

Teleconference: (867)-777-2828 Fax: (867)-777-2610

General Email Address: adminis@jointsec.nt.ca

**ENVIRONMENTAL IMPACT SCREENING COMMITTEE**

September 16, 2005

Submission Number: [09/05-01]

Randall Warren
Shell Canada Limited
400-4 Avenue SW
PO Box 100, Station M
Calgary, AB
T2P 2H5

Dear Mr. Warren:

RE: Project Description for the Type B Water License Renewal for Farewell Camp and Stockpile Site (Camp Farewell)

During a meeting held September 14-16, 2005, the Environmental Impact Screening Committee (EISC) screened the above-noted project description. Based on the information provided, the EISC decided that the development, if authorized subject to environmental terms and conditions recommended by the Screening Committee, will have no significant negative impact on the environment or Inuvialuit wildlife harvesting in the Inuvialuit Settlement Region [IFA Section 11.(17)(b)]. A copy of the decision has been attached.

Subject to a final decision by the licensing or permitting authority, the issuance of appropriate permits and approvals may proceed.

In rendering its decision, the EISC made the following recommendations:

- that the proponent ensure their fuel berms are capable of containing 110% of any fuel stored in tanks within the berm to avoid any spilling over, and contaminating the area;
- that the proponent haul grey water to the Inuvik sewage treatment plant for disposal if requirements are not met. This would prevent any contamination of the environment and wildlife;
- that the proponent observe the recommendations in the Environmental Protection Branch, Environment and Natural Resources, and Indian and Northern Affairs (Water Resources) letters,



ENVIRONMENTAL IMPACT SCREENING COMMITTEE

that the remediation and reclamation plan should be updated; and that the proponent have an adequate Emergency Response Plan, with personnel who are well trained and practised in case of emergency. The proponent should also have in place and be prepared to deploy in a timely fashion the necessary emergency equipment. This would prevent time being lost in the event of an emergency, thus limiting any potential contamination of the environment.

The EISC would appreciate receiving a copy of any follow-up reports that may be produced as a result of this development.

Sincerely,

Christine Inglangasuk
Secretary

Encl. (1)	EISC Decision
Encl. (2)	Correspondence from Tuktoyaktuk Hunters and Trappers
Encl. (3)	Correspondence from Inuvik Hunters and Trappers
Encl. (4)	Correspondence from Indian and Northern Affairs Canada
Encl. (5)	Correspondence from Environment and Natural Resources
Encl. (6)	Correspondence from Environment Canada

**ENVIRONMENTAL IMPACT SCREENING COMMITTEE**

NAME OF PROPONENT: Shell Canada Limited (Warren)

PROJECT DESCRIPTION: Type B Water License Renewal for Camp Farewell and Stockpile Site [09/05-01]

DECISION OF THE SCREENING PANEL (circled):

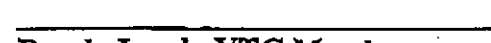
1. The development will have no such significant negative impact and may proceed without environmental impact assessment and review under the Inuvialuit Final Agreement. [IFA s. 11. (17) (a)]
2. The development if authorized subject to environmental terms and conditions recommended by the screening committee, will have no such significant negative impact and may proceed without environmental assessment and review under the Inuvialuit Final Agreement. [IFA s. 11(17)(b)]
3. The development could have significant negative environmental impact and is subject to assessment and review under the Inuvialuit Final Agreement. [IFA s. 11. (17) (c)]
4. The development proposal has deficiencies of a nature that warrant a termination of its consideration and the submission of another project description. [IFA s. 11. (17) (d)]

Signed on the 13th day of September 2005.


William Klassen, Chair

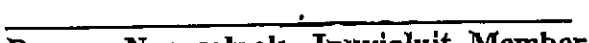

Catherine Cockney, GNWT Member


Alex Kaglik, Inuvialuit Member


Randy Lamb, YTG Member


Billy Day, Inuvialuit Member


Johnny Lennie, Canada Member


Darren Nasogaluak, Inuvialuit Member

Tuktoyaktuk Hunters &
Trappers Committee

P.O. BOX 286, TUKTOYAKTUK, NWT X0E 1C0

SEP 14 2005

FAX

Date: September 14, 2005

Number of pages including cover sheet: 6.0

To: Environmental Impact
Screening Committee
The Joint Secretariat
Inuvik, NT
ATTN: Christine Inglangasuk

Phone: 867-777-2828

Fax phone: 867-777-2610

CC:

From: Sarah McKay
Resource Person

Phone: 867-977-2457

Fax phone: 867-977-2433

REMARKS: ☐ Urgent ☐ For your review ☐ Reply ASAP ☐ Please comment

Christine:

Re: Comments and Recommendations by THTC Board on various applications on the 29th of August, 2005

The Tuktoyaktuk Hunters and Trappers Committee Board held a regular board meeting on the 29th of August, 2005 and made motions on the following listed applications (excerpts from Minutes):

9. Applications for Approval:

9.1 Aurora College - ConocoPhillips study request for Inventory Assessment of drilling waste sumps in the Mackenzie Delta of the ISR.

The board stated that people are not in favor of the study being done by industry. If the study gets approval then it should be done by an independent company to prevent favoritism in favor of the industry.

The board also stated that they haven't seen an assessment report for 2004 and requested a copy from EISC.

Motion #5/86 Moved by David Nasogaluak to support the study request on the condition that the work be done by an independent researcher. Seconded by Emmanuel Adam.

Motion carried.

9.2 EISC - Shell Canada Ltd, Project Description for the Type B Water License Renewal for Farewell Camp and Stockpile Site (Camp Farewell).

Motion #5/87 Moved by Emmanuel Adam to support the project. Seconded by Eric Cockney.

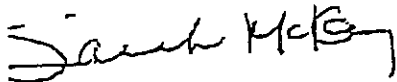
Motion carried.

9.3 ILA - Imperial Oil for the clean up of the eastern shoreline of the IOL Tuk Base Camp lease.

Motion #5/88 Moved by Emmanuel Adam to support project on the condition the whole shoreline of the lease site be included in the clean up. Seconded by Eric Cockney.

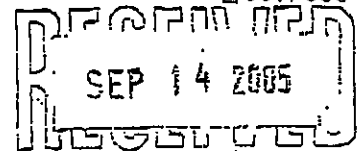
10.1 EISC - Investigation of Local Lake Populations of Gammarus lacustris for Use as a Food Source in Aquaculture Project - Pending receipt of comments from local HTC.

The board had no comments to add but suggested that Inuvik HTC be consulted as it is within their area of concern.



James Pokiak

A/Chair



6.1



P.O. Box 1720
Inuvik, NT X0E 0T0
Tel: (867) 777-3671
Fax: (867) 777-2478
Email: ihc@permafrost.com

September 14th, 2005

Environmental Impact Screening Committee
P.O. Box 2120
Inuvik, NT
X0E 0T0

**Re: Shell Canada Ltd. (Warren), Project Description for the Type B
Water License Renewal for Farewell Camp and Stockpile Site (Camp
Farewell) [09/05-01]**

Dear Sir/Madam

The Inuvik Hunters & Trappers Committee held their regular board meeting September 13, 2005 and the board of directors will support of the water license renewal but all grey water must be hauled back to Inuvik.

If you have any questions or concerns please feel free to call the Inuvik HTC office at 777-3671.

Thank you,

Ron Gruben, President
Inuvik Hunters & Trappers Committee

SEP 02 2005

Indian and Northern Affairs Canada
Affaires indiennes et du Nord Canada

FACSIMILE TRANSMITTAL
TRANSMISSION PAR TÉLÉCOPIEUR

Number of pages including this page
Nombre de pages incluant cette page

Date

2005/9/5

FROM - DE

Name - Nom

Nathan M. Richeu

Position title - Titre du poste

EA Coordinator

Branch - Direction

Branch - Direction générale

Water Resources Division

Fax - Tél.

Fax - Tél.

Facsimile no. - N° de télécopieur

(867) 669-2716

Telephone no. - N° de téléphone

(867) 669-2667

TO - À

Name - Nom

Mr. Randall Warren (Shell), Ms. Vanessa ~~Chen~~^{Charlwood} (EC), Mr. Bruce Hanna
Mr. Wade Romanko (EC), Mr. Rudy Cockney (INAC), Ms. Christine
Anglonsuk (EISC), Ms. Meike Vander Valk (NEB)

on file (ENR)

Facsimile no. - No de télécopieur

Telephone no. - N° de téléphone

Attached is the Shell Canada Camp Farewell Information Request #1. We request Shell's response by Sept. 16, 2005 and that the response is sent to all individuals copied above. If you have any questions or need clarification please contact me.

Thanks,
Nathan

NORTHWEST
TERRITORIES
WATER BOARD



NUNAPPA
SIVUNIUKPAIT
IMMAKUN

WATER REGISTER: N7-1-1762

September 2, 2005

Mr. Randall Warren
Shell Canada Limited
400 - 1st Avenue S.W.
Calgary, AB T2P 2H6
Telephone: (403) 691-2521
Fax: (403) 262-7948

Dear Mr. Warren:

Re: Shell Canada Limited Camp Farewell Type B Water Licence Renewal Application
Information Request No. 1

Pursuant to our obligations under the *Canadian Environmental Assessment Act* (CEAA) the Northwest Territories Water Board, in the preparation of a joint screening with Environment Canada, has reviewed Shell Canada Limited (Shell) Camp Farewell Type B Water Licence Renewal Application, located within the Inuvialuit Settlement Region (ISR) of the Mackenzie Delta.

The following information requests refer to *Shell Canada Limited project Description Type 1 water Licence Renewal Farewell Camp and Stockpile Site (July 2005)*. We request that you provide your response by 15 September 2005 to Dr. Kathleen Racher, Technical Advisor, NWT Water Board and the individuals copied below.

Section 5.2 Camp Overview

Shell states that Camp Farewell has been in operation since 1969. It is self-contained providing electricity, heat, accommodation, kitchen facilities, fuel storage, equipment handling, water withdrawal and waste treatment. The camp is able to accommodate up to 150 people and covers an area of 12.4 hectares. Does this area include all features of the Farewell Camp and Stockpile Site including the storage area, gravel airstrip and barge-landing site?

2. Section 5.4.4 Wastewater Treatment

Shell states that Camp Farewell has a fully operational sewage treatment system in place and that the plant has been designed for 120+ people. The section goes on to discuss the estimated water use per day by person and the treatment capacity of the treatment system. This treatment system was upgraded in the summer of 2002. However, has the camp been at or near full capacity (150 people) since the changes to the sewage treatment system? If so, how has it performed (i.e. effluent quality)?

3. Section 5.5.1 Fuel

Shell states that it has permanent bermed facilities for 2.0 million litres of diesel fuel storage. The tank farm consists of two 750 m³ tanks and three 300 m³ tanks. The tanks are single-walled with secondary containment. Our calculations indicate that these five tanks have combined fuel storage of 2.4 million litres. How will the bermed facilities account for the extra fuel that may be stored within the tanks?

The following information requests refer to letters received from other federal departments:

4. August 19, 2005 Letter from DIAND – Water Resources Division
re: Shell Canada, Type B Water Licence Renewal Application N7L1-1762 Comp
Farwell, Mackenzie Delta, NT.

Please respond to the comments and recommendations identified by DIAND – Water Resources Division. Please provide the results of any further discussion with DIAND in regards to these comments and recommendations.

5. August 24, 2005 Letter from Environment and Natural Resources to the NWTWS
re: Comments – Shell Canada, Type B Water Licence Renewal Application
(N7L1-1762 Comp Farwell, Mackenzie Delta, NT.)

Please respond to the comments and recommendations identified by Environment and Natural Resources (GNWT). Please indicate what measures Shell would not be able to implement and the results of any further discussion with ENR in regards to those measures.

6. August 26, 2005 Letter from Environment Canada to the NWTWS
re: Type B Water Licence Renewal Application N7L1-1762 – Shell Canada
Comp Farwell, Mackenzie Delta, NT.

Please respond to the comments and recommendations identified by Environment Canada - EPB and CWS divisions. Please indicate what measures Shell would not be able to implement and the results of any further discussion with EC in regards to those measures.

We request that you provide your response by 16 September 2005. Please ensure that you send your response to the individuals copied below. If you have any questions or require clarification, please contact Mr. Nathan Richea at (867) 669-2657 or at nrichea@inac.alnc.gc.ca.

Yours truly,



Dr. Kathleen Racher
Technical Advisor
Northwest Territories Water Board

cc. Mr. Rudy Cockney, INAC
Ms. Miska Vander Valk, NEB
Mr. Wade Romenko, DOE
Ms. Vanessa Charlwood, CWS
Mr. Bruce Hanna, DFO
Ms. Christine Inglangasuk, EISC

**Water Resources
Division****Memo**

To: Sarah Aho
From: Robert Jenkins
cc: Nathen Richea
Date: August 19, 2005
Re: Shell Canada, Type B Water Licence Renewal Application: N7L1-1762 Camp Farewell, Mackenzie Delta, NT

Dear Sarah,

The Major Projects Section of the Water Resources Division has reviewed the abovementioned Water Licence Renewal Application and offers the following comments:

- It is our understanding that Shell Canada is not requesting to change the use of Camp Farewell in any manner. The existing footprint will not be increased and there are no upgrades to existing facilities proposed.
- Shell Canada is applying for the use of 150 cubic metres of water per day, the same amount currently approved for use under Water Licence number N7L1-1762. Freshwater sources include the Mackenzie River during the winter and an unnamed lake to the north for summer camp operation. Shell Canada must follow all DFO Protocols for water withdrawal in the Northwest Territories.
- Shell Canada has upgraded their wastewater treatment system to an extended aeration system. The sewage lagoon onsite is used as a contingency during start-up (2-4 weeks), system upset, and shutdown. The sewage lagoon is used as storage during this period. Does the wastewater stored in the contingency sewage lagoon get treated once the treatment system is operational? This may only be possible during summer operations.

- Shell Canada states that the sewage lagoon when in use is monitored on a regular basis to ensure dyke integrity. Repair requirements, if encountered, are included in the site maintenance schedule. Has Shell ever performed any repairs to their sewage lagoon? If so, what were these repairs, why were they required, and when were they performed?
- Shell Canada has had a Phase II site assessment performed at the Camp Farewell lease area. It has been discovered that large amounts of contaminated sediments and soils exist at the site. Specifically:
 - 5,500 m³ of soils contaminated by only hydrocarbons;
 - 5,500 m³ of soils contaminated by barium, above residential/parkland criteria but below industrial criteria; and
 - 5,300 m³ of soils contaminated by both organic and/or inorganic parameters above industrial criteria.
 - 1,300 m³ of sediments potentially contaminated by hydrocarbons.

Within the abandonment and restoration plan supplied by Shell Canada, various treatment options for the remediation of contaminated sediments and soils are proposed. However, when will Shell Canada be initiating the reclamation of the site? Will Shell Canada be performing any progressive reclamation of the site to deal with the areas of impacted sediments and soils?

- Shell outlines in Section 6.3.1 of their Abandonment and Restoration Plan that insitu biological treatment is proposed for contaminated native soils located outside the base pad area. However, the specific treatment method and volume of contaminated soil is yet to be determined. This determination will be made following an additional environmental assessment of off-base pad areas. When is Shell Canada proposing to do this assessment of the off-base pad area?
- Shell's reclamation plan involves leaving the current urethane and gravel layers of the base pad in place. However, in earlier sections of their Abandonment and Restoration Plan, Shell states that the gravel layer is contaminated with barium as these soils were originally mixed with drilling mud products to establish good gravel adhesion and compaction. In addition, it was seen that at Stockpile #2, when a free portion of the insulation was squeezed, it produced an apparent mixture of water and hydrocarbon. Shell further states that leaving the urethane layer in place will provide an effective

impermeable liner to prevent contamination of underlying soils and groundwater. Does Shell anticipate any lateral movement of contaminants? If these soils and urethane layer are left in situ and treated as such, the site must be monitored to ensure that the movement of contaminants is not occurring at the site.

- Soil monitoring as proposed in Section 7.1 of the A&R plan should include analysis for sodium and potassium.
- The Camp Farewell Emergency Response Plan should include specific details with respect to procedures for spill response for spills on and under ice. As well, the location of spill response equipment onsite should be identified, in addition to the equipment list.
- Shell Canada is aware of the INAC Spill Reporting Protocol for upstream oil and gas operations, as contained in their Emergency Response Plan (ERP). Under this Protocol, spill reporting thresholds are outlined for various products for INAC lead spills. The NEB also has a Spill Reporting Protocol containing the same reporting thresholds for NEB lead spills. In the Camp Farewell ERP, Shell states that the NEB is to be notified if a spill exceeds 200 litres. This is incorrect. As mentioned, the NEB and INAC have spill reporting protocols outlining their spill reporting requirements. Shell should refer to the NEB protocol and update their ERP. It is also important to note that different agencies other than INAC and the NEB may have different spill reporting amounts. Shell Canada must ensure that they are reporting their spills in accordance with the requirements of the responsible agency.

I thank you for the opportunity to review this project. If you have any questions or concerns, feel free to contact me at 867-669-2574 or jenkinsre@inac.gc.ca

Sincerely,

Robert Jenkins
Acting Head, Major Projects
Water Resources Division
Indian and Northern Affairs Canada

Environmental Protection Division
Environment and Natural Resources
P.O. Box 1020
Yellowknife NT X1A 2L9
Telephone (867) 873-7354
Fax (867) 873-0221

August 24, 2005

Dr. Kathleen Racher
Manager
Water Resources Division
Indian Affairs and Northern Development
P.O. BOX 1500
YELLOWKNIFE NT X1A 2R3

Dear Dr. Racher:

Comments – Shell Canada, Type B Water License Renewal
Application (N7L1-1762 Camp Farewell, Mackenzie Delta, NT)

The Environmental Protection Division (EPD) has reviewed the Shell Project Description, Type B Water License Renewal, Farewell Camp and Stockpile Site and offer the following comments.

Shell Canada has stated it does "not intend to change the use of Camp Farewell" while describing the historical operations of the facility. The EPD would like to suggest to the Board, however, given the pending Mackenzie Gas Project (MGP), and Shell Canada's status as an NEB applicant for the *Construction and Operation of the Mackenzie Gas Pipeline*, under the *Niglitgak Development Plan*, it is reasonably foreseeable that the magnitude of operations at Camp Farewell, conditional upon approval of the MGP, will considerably increase.

Waste Management - Incineration

The project description and various components of the Emergency Response Plan state that incineration and open burning are to be used as a waste management option. For example, the *Operations and Maintenance Plan - Solid Waste Disposal*, states that "1. Combustible camp waste will continue to be burned in the incinerator located within the camp", and "2. The larger construction debris (pallets etc) that was previously burned in an earthen pit onsite will now be burned in a metal sloop. The residual ashes from the incinerator and burn sloop will be transported to the Inuvik landfill for final disposal after obtaining appropriate approval"

The EPD recognizes that timely disposal of camp waste - specifically food waste - is of critical importance to minimize safety risks associated with wildlife attraction. Timely disposal is usually achieved through burning. However, burning of waste products releases numerous contaminants to the air, many of them persistent, bioaccumulative and toxic (e.g. polycyclic aromatic hydrocarbons - PAH's - heavy metals, chlorinated organics - dioxins and furans). These contaminants can result in serious impacts to human and wildlife health through direct inhalation and they can also be deposited to land and water, where they bioaccumulate through food chains affecting wildlife and country foods. Therefore, burning should only be considered after all other alternatives for waste disposal have been explored.

- 2 -

If burning is the only alternative available, the proponent should ensure that the amount of waste burned is reduced as much as possible through implementation of pollution prevention strategies such as purchasing policies that focus on reduced packaging, and on-site diversion and segregation programs (i.e. the separation of non-food waste items suitable for storage and subsequent transport and disposal or recycling). The objective should be to ensure that only food waste and food-contaminated waste is burned. The open burning (e.g. in a pit or 'sloop') of material other than paper, cardboard and clean, untreated wood is unacceptable (see the *Municipal Solid Wastes Suitable for Open Burning* pdf document at <http://www.enr.gov.nt.ca/eps/environ.htm>). The use of paper, cardboard and clean, untreated wood as supplementary fuel in an incinerator is acceptable.

Recommendations:

- Implement an Integrated Waste Management Plan including waste segregation and recycling to minimize the amount of waste disposed of by incineration and open burning.
 - The proponent should review options available for management of waste and submit a report to the regulatory authority as part of the authorization process. The report should document the types and amounts of waste generated, management and disposal options considered (including justification for the options selected and rejected) and summarize the pollution prevention strategies employed by the company.
 - The proponent should certify in writing to the regulatory authority that camp personnel will be familiarized with the selected waste management options and receive instruction in implementing them.
- Open burning in a pit or sloop should be restricted to acceptable waste material only – i.e. paper, cardboard and clean, untreated wood.
- Open burning of other camp waste is not acceptable. Installation of an incineration device capable of meeting the emission limits established by the Canadian Council of Ministers of the Environment (CCME) under the Canada-wide Standards (CWS) for Dioxins and Furans and the CWS for Mercury Emissions is required for a camp of this size and duration. Copies of the CWS's and additional information are available on the CCME website at http://www.ccme.ca/ourwork/air.html?category_id=32 under the appropriate headings.
 - A variety of incineration devices are available and selection of the most appropriate will depend on considerations of technical and economical feasibility for each situation. The proponent should review the incineration options available and provide justification for the selected device to the regulatory authority. The proponent should also state how compliance with the CWS will be demonstrated.
 - It is important to note that installation of 'technologically advanced' incinerators alone is not sufficient to ensure compliance with the CWS. It is critical that the technology be combined with the comprehensive waste management strategy (especially waste segregation) recommended above, as well as diligent operation and maintenance. The proponent should demonstrate to the regulatory authority that appropriate training will be provided to personnel operating the incinerator.

- 3 -

- The residual ash from incineration may itself contain toxic contaminants and should be assessed in accordance with the *NWT Environmental Guideline for Industrial Waste Discharges* to determine the appropriate disposal method.

Interim Abandonment and Restoration Plan

Nature and Extent of Contamination

Sect. 4.0 of the plan states that limited Phase 1 and Phase 2 environmental site assessments were conducted to identify the nature and extent of possible soil contamination at the Farewell Camp. The Phase 1 assessment identified a large historic fuel oil spill of 800,000 litres occurred at the site and despite efforts to collect free product, no soil/water remediation was conducted. The Phase 2 assessment confirmed that substantial volumes soil contamination exceeding remediation criteria including our Environmental Guideline for Contaminated Site Remediation exists at the site. For example, Sect. 4.2 estimates that 5,500 m³ of hydrocarbon-only contaminated soil exceeds the criteria at the storage area, airstrip and surrounding land.

Recommendations:

- The proponent should conduct a Phase 3 ESA (Detailed Testing Program) at the Farewell camp. If the proponent feels there is sufficient data from the Phase 2 ESA to characterize the site and/or risk to human health and the environment, then the proponent should develop a remedial action plan and begin remediating the large volume of contaminated soil in areas currently accessible.

Waste Water Disposal, Hazardous Materials and Waste, Spill Contingency Planning

Waste Water Disposal

In the Project Description, Section 5.4.5, *Wastewater Disposal*, it is stated that "Excess sludge will continue to be removed from the treatment plant and hauled to the sewage treatment facility in Inuvik". and Sect. 6.0, *Contingency Plans*, of the *Water Management Plan* states "Alternatively sewage is hauled to the municipal sewage treatment system in Inuvik for treatment and disposal". Sect 2.5.1, of the *Sewage Spill Emergency Response Plan* states there will be transportation of sludge from the sewage treatment plant to the treatment plant in Inuvik.

Recommendations:

- The Proponent is requested to supply:
 - Confirmation that the communities mentioned have authorization to accept waste;
 - Confirmation that the Proponent has received permission from the local communities to transfer proposed waste types and quantities to community waste handling facilities; and
 - Alternate disposal options in the case that communities cannot accommodate the waste.

- 4 -

Hazardous Materials and Waste

Sect. 5.5.2 of the *Project Description, Hazardous Materials*, states, "Hazardous materials are not typically required for camp operation. If hazardous materials, other than fuel, are required for a project based out of Camp Farewell, they will be securely stored, with the proper documentation and labelling". However, various portions of *The Emergency Response Plan* including: 7. *Containment and Control*, 8. *Decontamination and Cleanup*, and 9. *Disposal*, acknowledge that contaminants will/may require collection, storage, and disposal. In addition, equipment servicing wastes such as used engine oil, antifreeze, hydraulic oil, lead acid batteries, brake fluid and other lubricants will be generated and require approved disposal. Disposal of hazardous wastes in the NWT require Registration of the Generators, Carriers and Receivers and compliance with Transportation of Dangerous Goods Regulations.

Recommendation:

- The Proponent is requested to submit its hazardous waste management practices or plan for the proposed facility and activities showing compliance with the *Environmental Guideline for General Management of Hazardous Waste* and the *Transportation of Dangerous Goods Regulations* (NWT), and
- Plan for and include the locations of hazardous materials and waste storage areas on the Site Map included in the *Emergency Response Plan* (see *Emergency Response Plan Recommendations* below)

Emergency Response Plan

Contact numbers for Government agencies in Section 2.4.1 are incorrect. We suggest the section be reviewed and updated. Our department's new name is Environment and Natural Resources (ENR).

The supplied Camp Farewell Site Plan included in Sect. 2.5.3 of the *Shell Fuel/Spill Emergency Response Plan (Land)* is a small scanned document of poor quality where locations and names are difficult to discern.

Sect 2.5.1, of the *Sewage Spill Emergency Response Plan*, Sect. 7, *Containment and Control*, and Sect. 8, *Decontamination and Cleanup*, is very general regarding collection, clean-up, and remediation plans in the case of a Sewage Spill. For example, *Containment and Control* provides a cleanup strategy for frozen conditions only.

Recommendations:

- A legible site map should be provided that also includes the locations of spill response equipment, and all hazardous materials and waste storage areas.
- The Sewage Spill Emergency Response Plan should also include but not be limited to a clean up strategy in the case of a spill under non-frozen conditions, and a Remediation plan for the spill area.

- 5 -

- The plan should be reviewed and the numbers verified to confirm the party you are trying to contact in an emergency is in fact at the number in the plan.

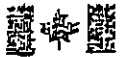
If you have any questions I can be reached at (867) 873-7654.

Sincerely,

Signed by

Ken Hall
Manager

c: Mr. Todd Paget



Environment Environment
Canada Canada

Environmental Protection Branch
Suite 901, 5204 - 50th Avenue
Yellowknife, NT X1A 1E2

Tel: (867) 869-4700

Fax: (867) 873-8155

August 26, 2005

Our file: 4703 002

Sarah Aho
Northwest Territories Water Board
Technical Advisory Committee
P.O. Box 1326
Yellowknife, NT X1A 2N9
Fax: (867) 669-2716

Re: Type B Water Licence Renewal Application N7L1-1762 - Shell Canada - Camp Farewell,
Mackenzie Delta NT.

On behalf of Environment Canada I have reviewed the information provided in support of Type B Water Licence Renewal for the Shell Canada's Camp Farewell.

Comments and Recommendations

- Meeting the requirements of the Federal *Fisheries Act* is mandatory, irrespective of any other regulatory or permitting system. Section 36(3) of the *Fisheries Act* specifies that unless authorized by federal regulation, no person shall deposit or permit the deposit of deleterious substances of any type in water frequented by fish, or in any place under any conditions where the deleterious substances, or any other deleterious substance that results from the deposit of the deleterious substance, may enter any such water.
- The contact spill response number for Environment Canada in the Emergency Contact list should be 920-5191 (24 hr-Pager monitored by EC Emergency and Enforcement Officers) not 868-4726.
- It is widely recognized that an effective spill response is conditional on the having the right equipment available for the spill situation, the equipment can be transported to the appropriate control points in a short time period and that there must be some expertise on site to direct equipment deployment operations. A review of the WC&GO General Emergency Response Plan would suggest there is very little expertise on site at any give time, and no spill equipment stored at the Farewell Downstream Control Point # 1. Nor, is there any contingency plan for the transportation of spill equipment (from Camp Farewell or Swimming Point) to appropriate control points in the event of spill into the Mackenzie River.
- Shell Canada retains the final responsibility for ensuring the conditions of the permits and authorizations are adhered to. Shell Canada is requested to provide a copy of the contractor's fuel handling and spill clean-up procedures, and an explanation of how Shell has ensured that the contractor is cognizant of and in adherence to permit conditions.
- Camp Farewell is located in the Kendall Island Bird Sanctuary, and as such, the proponent has acknowledged the requirement to obtain a Canadian Wildlife Service permit to maintain the camp. CWS requires advance notification in the event the camp becomes active.

- Section 8 (a) of the *Migratory Birds Regulations* states that no one shall disturb or destroy the nests or eggs of migratory birds. If activities are proposed to occur during the breeding season, the proponent should check for active nests of birds and avoid disturbing or destroying them.
- Other large industrial developments in the NWT have had problems in the past with hydrocarbon contaminated snow. Contaminated snow was picked up and dumped in a barren area and left to melt out in the spring. Because of the contamination, the snow melted earlier than other wetlands and created an artificial pond. Waterfowl were attracted to the open contaminated water, became oiled and died. The proponent does not mention how they would deal with contaminated snow in their project description. CWS recommends that contaminated snow be dealt with in a manner that would avoid this situation.
- In order to reduce disturbance to wildlife, CWS recommends that aircraft used in conducting project activities maintain a flight altitude of at least 510 m during horizontal (point to point) flight.
- In order to reduce disturbance to resting, feeding, or moulting birds, CWS recommends that aircraft used in conducting project activities maintain a vertical distance of 1000 m and minimum horizontal distance of 1500 m from any observed concentrations (flocks / groups) of birds.
- All mitigation measures identified by the proponent, and the additional measures suggested herein, should be strictly adhered to in conducting project activities. This will require awareness on the part of the proponents' representatives (including contractors) conducting operations in the field. Environment Canada recommends that all field operations staff be made aware of the proponents' commitments to these mitigation measures and provided with appropriate advice / training on how to implement these measures.
- Implementation of these measures may help to reduce or eliminate some effects of the project on migratory birds, but will not necessarily ensure that the proponent remains in compliance with the *Migratory Birds Convention Act* (the Act) and *Migratory Birds Regulations* (the Regulations). The proponent must ensure they remain in compliance with the Act and Regulations during all phases and in all undertakings related to the project.
- The *Species at Risk Act* (SARA) came into full effect on June 1, 2004. Species at risk that may be encountered in this area include: Eskimo Curlew, Peregrine Falcon (undrus subspecies), and Short-eared Owl. Other species that are pending addition to Schedule 1 that may be encountered are Grizzly Bears and Wolverines. While conducting their operations, the proponent should be aware of the special status, and implement mitigation measures to minimize disturbance to, or contact with, these species.

Changes in the proposed or permitted activities associated with this renewal application would require further review. I can be contacted at (867) 669-4736 (by e-mail at wade.romanko@ec.gc.ca).

Sincerely,



Wade Romanko
Environmental Emergencies and Assessment Officer
Engineering and Emergency Science Section

cc: Vanessa Charwood (Assessment Biologist, Environmental Conservation Branch, EC)

Indian and Northern
Affairs CanadaAffaires indiennes
et du Nord Canada

AUG 17 2005

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Date

2005/8/17

FROM - DE

Name - Nom

Position title - Titre du poste

EA Coordinator

Nathan M. Richea

Branch - Direction

Branch - Direction générale

Water Resources Division

P. 2 E

Fax - Téléc

Facsimile no. - N° de télécopieur

(867) 669-2716

Telephone no. - N° de téléphone

(867) 669-2637

A

To - À

Randall Warren (Shell), Mr. Lanny Coulson (CEAA), Ms. Christine

Morgenson (EISC), Mr. Gavin More (RWED), Mr. Jame Thorbourne (ILA),

Mr. Rudy Cockney (INAC), Mr. Bruce Hanna (DFO), Mr. Wade Romanko (EC)

Facsimile no. - No de télécopieur

Telephone no. - N° de téléphone

Attached is the CEAA Sec. 5 Letter for Shell Canada Limited Camp Farewell Type B Water Licence
renewal 17-1-1762. Let me know if you have any questions or need more info

Thanks
Nathan

NORTHWEST
TERRITORIES
WATER BOARD



NUNAPPA
SIVUNIUKPAIT
IMMAKUN

NWTWB File: N7-1-1762
CEAR#: 05-01-13812
17 August 2005

DISTRIBUTION LIST (ATTACHMENT 1)

**Shell Canada Limited Camp Farewell Type B Water Licence Renewal
Canadian Environmental Assessment Act (CEAA) Section 5 Notification and Scope**

The Northwest Territories Water Board (NWTWB) received an application from Shell Canada Limited (Shell) on July 15, 2005 pursuant to paragraph 14(6)(b) of the *Northwest Territories Waters Act* (NWTWA) for licence renewal of Camp Farewell, located on the northeast bank of Middle Channel near Harry Channel, Mackenzie Delta, within the Inuvialuit Settlement Region (Attachment 2). Shell's does not intend to change the use of Camp Farewell.

The present licence for Camp Farewell is scheduled to expire November 30, 2007. If your agency hasn't already received a copy of the Project Description and requirements for the purpose of your review, please contact Shell directly (address below).

The NWTWB, as a responsible authority under section 5 of the *Canadian Environmental Assessment Act* (CEAA) for the project has initiated an environmental assessment of the project in accordance with the *Regulations Respecting the Coordination by Federal Authorities of Environmental Assessment Procedures and Requirements* (Federal Coordination Regulations) to meet its obligations under the CEAA.

This letter is intended to address the federal coordination requirements under the CEAA, in particular to identify the responsible authorities (RA's) and Federal Authorities (FA's). The Inuvialuit Environmental Screening Committee (EISC) has placed the Project on its agenda for the 14th to 16th of September 2005 for screening under the *Inuvialuit Final Agreement*. In addition to the NWTWB Type B Water Licence, a access permit will be required from Environment Canada, Canadian Wildlife Service, for the camp lies within the Kendall Island Bird Sanctuary. No other approvals or authorizations have been identified to date.

The NWTWB seeks your concurrence on:

- The scope of the project;
- The factors to be assessed;
- The scope of the factors to be assessed; and
- A timetable for conducting a joint CEAA screening.

Canadian Environmental Assessment Act (CEAA) Section 5 Notification

Pursuant to section 5 of the Federal Coordination Regulations, the NWTWB requests that you review the attached information and indicate to the NWTWB whether your department/agency:

- (a) is likely to require an environmental assessment of the project under Section 5 of the Canadian Environmental Assessment Act (CEAA);
- (b) is in possession of specialist or expert information or knowledge that is necessary to conduct the environmental assessment of the project; or
- (c) requires additional information to make a determination referred to in (a) and (b).

With regard to (a), (b) and (c), the NWTWB asks that your response be provided to the NWTWB by 26 August 2005. Responses may be sent by facsimile to Nathan Riches, Environmental Assessment Coordinator, Water Resources Division, INAC at (867) 568-2716. A faxable form is provided for your convenience (Attachment 3). Please note that any information given pursuant to (b) above will be treated as a letter of comment for any future proceeding regarding the proposed project that the NWTWB may convene.

The NWTWB further asks that you provide Shell with a copy of any response in respect to the above requests.

CEAA Federal Coordination Regulation Section 8 Requirements

With respect to section 8 of the federal coordination regulations, the NWTWB requests your review of and comment on the following in preparing any joint determination of the scope of the project, the factors to be considered, and the scope of those factors:

A. Scope of the Project

1. Undertaking in relation to the physical work or physical activity triggering the CEAA.

The NWTWB considers the principle project to be the withdrawal of water for domestic use and the deposit of waste within the Mackenzie Delta region Northwest Territories.

2. Other associated physical works or physical activities that must be undertaken to carry out the project.

The NWTWB notes that for the project to proceed to completion the following physical works and activities would need to be undertaken:

- Water to be withdrawn from channels of the Mackenzie River (winter) and the unnamed lake (summer). Daily maximum withdrawals would not exceed 150m³/day.
- Discharge of wastewater would not exceed 150m³/day.
- Incineration of combustibles and food wastes on site with the resulting ash being disposed of in the Inuvik Landfill.
- Storage of fuel up to 2 million litres with secondary containment.
- Maintenance of camp buildings, equipment and airstrip.

- Maintenance and upkeep of wastewater treatment plant.

3. Other undertakings in relation to the physical works and activities identified in items (1) and (2) above.

No further activities have been identified in relation to the physical works. Any additional research, exploration and development activities would be subject to future examination under the COGOA and, consequently, under the CEAA.

B. Factors to be Assessed

The factors to be considered within the scope of an environmental assessment would be those set out in subsection 16(1) of the CEAA.

C. Scope of the Factors to be Assessed

The reviewer will consider the potential effects of the proposed project within the spatial and temporal boundaries that encompass the periods and area during and within the proposed project may potentially interact with, and have an effect on, components of the environment.

D. Proposed Process and Timeline

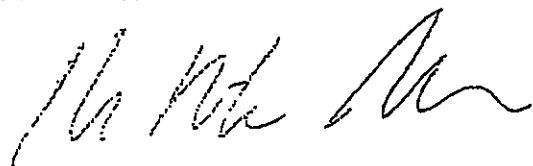
The NWTWB recommends that the CEAA environmental assessment be conducted to meet a time frame agreed to by federal responsible authorities and possibly federal authorities.

CEAA Federal Coordination Regulations Section 9 Requirements

We trust the forgoing information and recommendations, if agreed upon, will meet the requirements of sections 8 and 9 of the CEAA Federal Coordination Regulations. If your department or agency is a responsible authority in respect of the Shell project, please indicate whether you concur with the above recommendations for the scope of the project: the factors to be assessed and the timetable for conducting a CEAA environmental assessment.

We ask that you provide Shell with a copy of any response in respect of the above requests. If you have any questions regarding the above, please contact Nathan Richea, Environmental Assessment Coordinator, at (867) 669-2657, Fax: (867) 669-2716, or email: nricha@inac.ainc.gc.ca.

Your Truly,



Dr. Kathleen Racher
Technical Advisor to the NWTWB

c.c.

Mr. Randall Warren
Shell Canada Limited
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Fax: 403-269-7948
Email: randall.warren@shell.com

Mr. Lanny Coulson
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Canadian Environmental Assessment Agency
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Ms. Chrisline Inglangasuk
Environmental Impact Screening Committee Resource Person
Joint Secretariat – Inuvialuit Renewable Resources Committees
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Mr. Gavin More
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Mr. James Thorbourne
Land Administrator
Inuvialuit Land Administration
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Tuktoyaktuk, NT X0E 1C0
Tel: 867-977-7100
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Attachment 1 – Distribution List

Federal Agencies – Response Requested by 26 August 2005.

Mr. Rudy Cockney
District Manager
North Mackenzie District
Indian and Northern Affairs Canada
PO Box 2100
Inuvik, NT X0E 0T0
Tel: (867) 777-3361 Fax: (867) 777-2090
Email: cockneyr@inac-ainc.gc.ca

Mr. Bruce Hanna
Area Habitat Biologist
Western Arctic Area
Central & Arctic Region
Fisheries and Oceans Canada
Suite 101, 5204 50th Ave.
Yellowknife, NT X1A 1E2
Tel: (867) 669-4931 Fax: (867) 669-4940
Email: hannab@dfo-mpo.gc.ca

Ms. Micheline Turpin
Information Coordination Officer
Office of Environmental Affairs
Natural Resources Canada
580 Booth Street
Ottawa, ON K1A 0E4
Tel: (613) 996-3086 Fax: (613) 995-5719
Email: hannab@dfo-mpo.gc.ca

Mr. Ed McLean
Manager of Resource Conservation
Parks Canada – Western Field Unit
PO Box 1840
187 Mackenzie Road
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Tel: (867) 777-8818 Fax: (867) 777-8820
Email: ed.mclean@pc.gc.ca

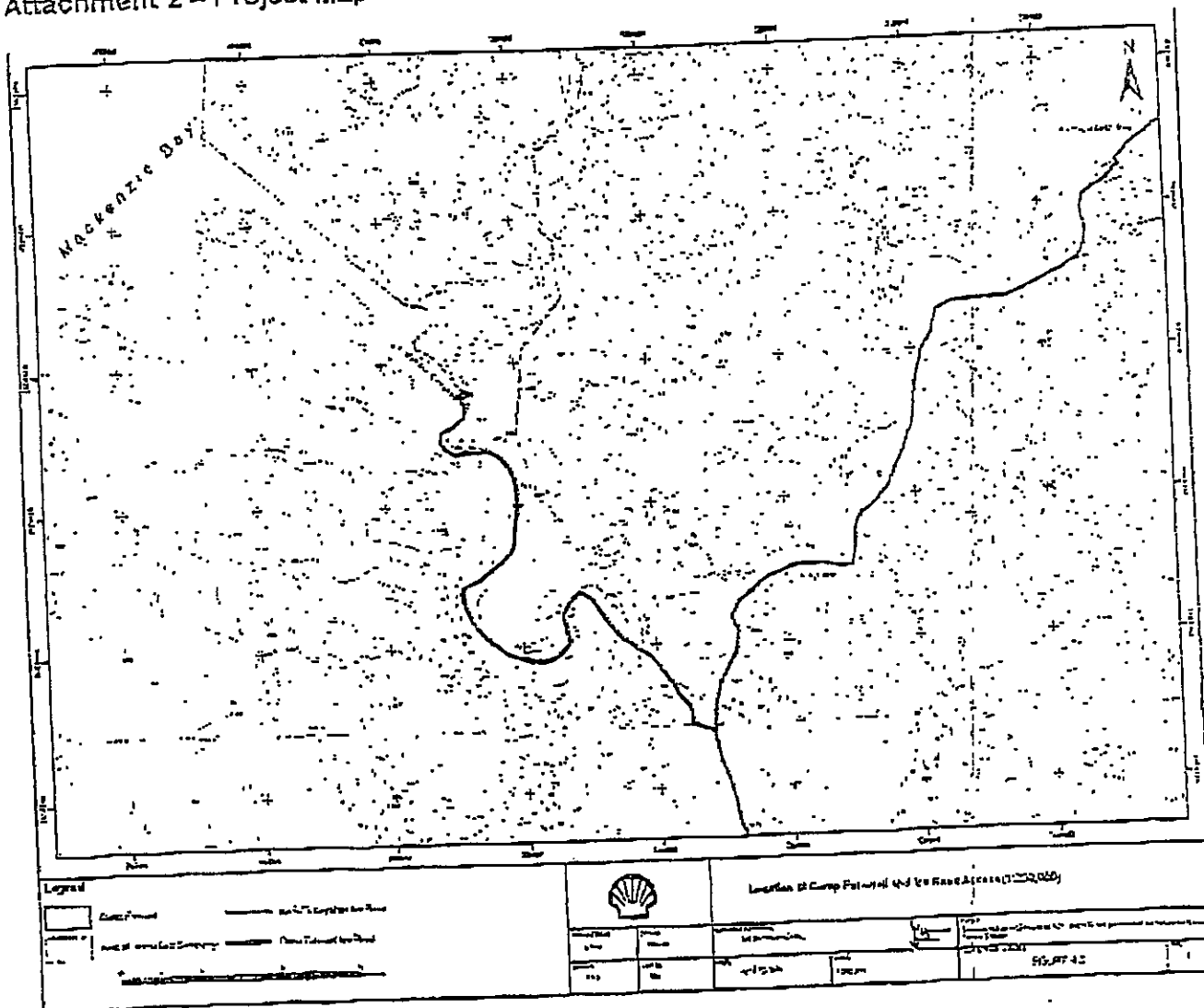
Ms. Sarah Aho
Head, Policy and Assessment
Water Resources Division
Indian and Northern Affairs Canada
PO Box 1500
Yellowknife, NT X1A 2P2
Tel: (867) 669-2402 Fax: (867) 669-2716
Email: ahos@inac-ainc.gc.ca

Mr. Wade Romanko
Northern Environmental Assessment Coordinator
Northern Division
Environment Canada
Suite 301, 5204 50th Ave.
Yellowknife, NT X1A 1E2
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Mr. Tak Nakamura
Regional CEAA Coordinator
Environmental Health Services
Health Canada
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Edmonton, AB T5J 4C3
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Mrs. Vanessa Charlwood
Environmental Assessment Coordinator
Environment Canada
Canadian Wildlife Service
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Attachment 2 - Project Map



Attachment 3 -

NWTWB File #: N7-1-1762

Shell Canada Limited Camp Farewell Type B Water Licence Renewal

Pursuant to the *Regulations Respecting the Coordination by Federal Authorities of Environmental Assessment Procedures and Requirements* (Regulations), please indicate to the Northwest Territories Water Board by August 26, 2005 whether your Department/Agency (please check off the appropriate box):

- a) Is likely to require an environmental assessment of the project under Section 5 of the *Canadian Environmental Assessment Act* (CEAA);

☐ No☐ Yes

Trigger: _____

- b) Is in possession of specialist or expert information of knowledge that is necessary to conduct the environmental assessment of the project;

☐ No☐ Yes

- c) Requires additional information to make a determination referred to in a) or b) above.

☐ No☐ Yes

Please advise what role your Department/Agency plans to play in this review by FAXING THIS RESPONSE TO the Technical Advisor to the NWTWB, Dr. Kathleen Racher at (867) 669-2716.

Please provide the following contact information:

Name: _____

Title/Department: _____

Address: _____

Telephone: _____

Facsimile: _____

Email: _____

Date Authorized _____

Signature for the Responding Department or Agency _____

cc:

Gordon Wray

Chair, N.W.T. Water Board
2nd Floor, Goga Cho Building
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Erin Hiebert

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Environmental Assessment Coordinator

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Shannon Pagotto

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Ron Morrison

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Evelyn Storr
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Ron Gruben
President
Inuvik Hunters and Trappers Committee
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Inuvik NT X0E 0T0

James Pokiak
A/Chair
Tuktoyaktuk Hunters and Trappers
Committee
Box 286

Frank Pokiak
Chair
Inuvialuit Game Council

Bob Bell
Chair
FJMC

