

From: damoursgauthierv [mailto:damoursgauthierv@nwtwb.com]
Sent: Monday, October 04, 2010 4:37 PM
To: Bird, Sam
Cc: Randall.Warren@shell.com; 'Mike Harlow'; Andrea.Lai@shell.com
Subject: Request of Information- Camp Farewell (N7L1-1762)

Dear Mr. Bird,

NWT Water Board support staff reviewed the water licence N7L1-1762 renewal application for completeness, and based on this review determined that the renewal application is incomplete, and requires additional information and clarification in several areas.

During a telephone communication with you on September 10th, 2010, I mentioned to you that you could always refer to documents that had already been submitted to the NWT Water Board for the information that remain the same. But, in the renewal application there is no reference to previous documents that had been submitted to the Board. Therefore, the application is lacking in information.

The Board cannot assume that the information found in the documents submitted to them in the past remains the same unless Shell Canada Limited refers to these documents. Therefore, you can answer some of the comments or questions in the attached letter addressed to Randall Warren by referring to documents that the NWT Water Board had already received in the past. If you cannot refer to any documents that had been submitted to the NWT Water Board, new documentations or information should be submitted.

Please provide the missing information at your earliest convenience and no later than October 8, 2010.

Please contact me at the information below, as soon as possible, if you have any questions or comments.

Sincerely,

Véronique D'Amours Gauthier
Science and Regulatory Officer
NWT Water Board
Phone: 867-678-8619
Fax: 867-678-2943
E-mail: damoursgauthierv@nwtwb.com

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10/13/2010



Water Register: N7L1-1762

October 4th, 2010

Randall Warren
Shell Canada Limited
400- 4th Avenue S.W.
P.O. Box 100, Station M
Calgary, Alberta
T2P 2H5

Dear Mr. Warren,

Re: Renewal of Water Licence N7L1-1762 (Camp Farewell)

The Northwest Territories Water Board (NWT Water Board) is responsible for the utilization, conservation and protection of waters in the Inuvialuit Settlement Region, NWT. Under Sub-paragraph 18(1)(a)(i) of the *Northwest Territories Waters Act*, Shell Canada Limited submitted a Type B Water Licence renewal application on October 1st, 2010.

The NWT Water Board support staff reviewed the above renewal application for completeness, and based on this review determined that the renewal application is incomplete, and requires additional information and clarification in several areas. Comments and questions on the renewal application have been summarized and are enclosed for your information.

Please consider this letter as a request for additional information as per the NWT Water Board Rule and Procedure 37. Please provide this information at your earliest convenience and no later than October 8, 2010.

Should you have any questions or concerns, please feel free to contact Véronique D'Amours Gauthier at (867) 678-8619 or via e-mail at damoursgauthierv@nwtwb.com.

Sincerely,

Véronique D'Amours Gauthier
Science and Regulatory Officer
NWT Water Board

Encl.: Review Comments and Questions on Type B Water Licence Renewal Application for Shell Canada Limited (N7L1-1762).

Review Comments and Questions on Type B Water Licence Renewal Application for Shell Canada Limited (N7L1-1762)

Introduction

The comments and questions provided herein are based on a completeness review of the Type B Water Licence renewal application for Water Licence N7L1-1762. The review was based on the merit of the renewal application alone.

In filing a renewal application, the applicant must meet the requirements of the *Northwest Territories Waters Act*, and the *Northwest Territories Waters Regulations*, with particular attention to (but not limited to):

- Schedule III application form contained in the Northwest Territories Waters Regulations;
- Sections 6 and 7 of the Northwest Territories Waters Regulations;
- Section 17 of the Northwest Territories Waters Act; and,
- NWT Water Board Water Licence Application Questionnaire for Municipal Undertakings.

The following provides general review comments and questions related to overall deficiencies in the application.

The application is lacking the detailed information required to process a water licence renewal application. The following clarifications are needed in order to complete your application.

Schedule III Application information requirements:

Section three (3) 'Location of Undertaking'

No maps were submitted with the renewal application. Please refer to existing maps that had already been submitted in one of your previous application or submit new maps to the NWT Water Board.

When applicable, the maps should indicate the location of watercourses, the location of any proposed waste deposits, the raw water intake, the water treatment facilities, the fuel and chemical storage, the sewage treatment facilities, the wastewater treatment area and discharge outlets, the solid waste disposal areas and drainage patterns, the location of hazardous waste disposal area, the transportation access routes and the location of environmental monitoring sites.

Section four (4) 'Description of Undertaking'

This section refers to attached documents. The supporting project description document (a letter dated of September 29, 2010, submitted by IEG Consultants on which you were c.c.) does not describe the capacity of the Camp. Please clarify the description of undertaking by submitting the capacity of the Camp.

Section seven (7) 'Quantity of Water Involved'

It is mentioned in this section "... and the Unnamed Lake to the north in the summer." Please submitted the missing information; to the north of what?

Also, it is mentioned in this section that treated wastewater will be discharged to the Mackenzie River (150 cubic metres per day) provided discharge criteria are met. Please clarify which criteria Shell Canada Limited will respect before discharging wastewater.

Section eight (8) 'Waste Deposited'

This section requires more information with respect to waste including, but not limited to:

- description of any and all wastes produced and methods of disposal is incomplete (i.e. missing the disposal of solid waste, how is the waste transported to the Inuvik facilities, how is the waste stored in Camp, how long is the waste stored in Camp)
- Does the town of Inuvik approve the disposal of waste from Camp Farewell in their facilities?
- Is the quantity of effluent to be deposit per day, per month or per year?
- description of any proposed methods for waste storage
- list of hazardous materials to be used and stored on site
- methods for handling, storage and disposal of hazardous material
- plans for abandonment and/or temporary closure of fuel and hazardous waste storage facilities

Solid Wastes:

- Do you plan on storing solid waste on site? If yes, where, in what quantities and for how long? Do you plan on removing stored wastes to a third party facility? If yes, which facility. Please provide proof of authorization from this facility. How often do you plan to remove solid wastes from Camp Farewell to a third party facility? How do you plan on removing solid wastes from Camp Farewell?
- Do you plan on disposing of solid wastes on site? If yes, where and in what quantities?

Wastewaters:

- Do you plan on storing wastewaters on site? If yes, where, in what quantities and for how long? Do you plan on removing stored wastes to a third party facility? If yes, which facility. Please provide proof of authorization from this facility. How often do you plan to remove solid wastes from Camp Farewell to a third party facility? How do you plan on removing wastewaters from Camp Farewell?
- Do you plan on disposing of wastewaters on site? If yes, where and in what quantities?

Hazardous Wastes:

- Do you plan on storing hazardous waste on site? If yes, where, in what quantities and for how long? Do you plan on removing stored wastes to a third party facility? If yes, which facility. Please provide proof of authorization from this facility. How often do you plan to remove hazardous wastes from Camp Farewell to a third party facility? How do you plan on removing hazardous wastes from Camp Farewell?
- Do you plan on disposing of hazardous wastes on site? If yes, where and in what quantities?

Sewage:

- Do you plan on storing sewage waste on site? If yes, where, in what quantities and for how long? Please provide proof of authorization from the Town of Inuvik for the disposal of sewage. How often do you plan to remove solid wastes from Camp Farewell to a third party facility? How do you plan on removing sewage wastes from Camp Farewell?

Please submit the above information. If it already exists, please refer to the document (and pages, if applicable) where the NWT Water Board can find the information.

Also, in the supporting project description document (a letter dated of September 29, 2010, submitted by IEG Consultants on which you were c.c.) it is mentioned that the "sewage lagoon is no longer used for disposal of waste water. All wastewater that may now be generated by Camp operations is removed from the site for disposal in Inuvik". In Schedule III it is mentioned that "sewage and greywater to be treated using the existing Extended Aeration Sewage Treatment System. The effluent discharged to the Mackenzie River will comply with the effluent quality requirements..." Please provide clarification on this matter, since it appears the documents contradict.

Section ten (10) 'Predicted Environmental Impacts of Undertaking and Proposed Mitigation'

The renewal application does not describe the predicted environmental impacts nor does it identify mitigation measures for potential environmental impacts. Please refer to existing documentations submitted to the NWT Water Board by Shell Canada Limited regarding the prediction of environmental impacts and mitigation measures or submit a new document in that regards to the NWT Water Board.

Section eleven (11) 'Contractor and sub-contractors'

Will a list of contractor and/or sub-contractors working at Camp Farewell be forwarded to the NWT Water Board once available?

Application Fee

Please submit the renewal application fee payable to the Receiver General.

Security Deposit

Please, submit a proof that the security deposit will be maintained in accordance with section 17 of the *Northwest Territories Waters Act*.

NWT Water Board Water Licence Application Questionnaire for Municipal Undertakings

At a minimum, the following information is required:

- Descriptions of the freshwater intake facility
- Descriptions of the operating capacity of the pump used
- Descriptions of the type of water storage facility
- The capacity of the storage facility (m³)
- The effects on the river or lake from which water will be drawn
- The capacity of the treatment facility
- Type of water treatment facility
- Describe in detail the method of water treatment (i.e. backwash, flocculation, sedimentation, chemicals used)
- Have there been any problems or health and environmental concerns with the water treatment facilities?
- Are there any changes planned in the water treatment facilities?
- List and describe the locations of abandoned or restored sewage treatment facilities
- Briefly describe the methodology that is presently used to sample the raw water supply

If the information had already been submitted to the NWT Water Board, please refer to the documents (and pages, if applicable) where the NWT Water Board can find the information.

Other information requirements

At a minimum, the following management plans or information are required:

- The supporting project description document (a letter dated of September 29, 2010, submitted by IEG Consultants on which you were c.c.) should be signed.
- Water Management Plan
- Emergency Response Plan
- Spill Contingency Plans for contaminant and clean up in the event of a spill. The plan shall describe courses of action, mitigative methods and equipment available for use
- Waste Management Plan
- Operation and Maintenance plans, including access road(s)
- Abandonment and Restoration Plan
- Details of access route(s) to the site should be provided including location and method of construction (i.e. winter access road)

Please submit the above information or documents. If the information or documents had already been submitted to the NWT Water Board, please refer to the documents (and pages, if applicable) where the NWT Water Board can find the information.

Liz Castaneda

From: damoursgauthierv [damoursgauthierv@nwtwb.com]
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10/5/2010