

April 26, 2002

Mr. Randy Hetman
DAR/Construction Manager
Shell Canada Limited
400 - 4th Avenue, S.W.
P.O. Box 100, Station M
CALGARY, AB T2P 2H5

Dear Mr. Hetman:

RECLAMATION PLAN: SHELL FAREWELL WATER SYSTEM

The Northwest Territories Water Board has reviewed the above Reclamation Plan as required by your industrial Water Licence, Part G, Item 1. This Plan is lacking information required by the Northwest Territories Water Board "Guidelines for Abandonment and Restoration Planning for Mines in the Northwest Territories, September 1990". Therefore, the Board is requesting that a revised Plan be submitted for review and approval within forty-five (45) days of the date of this letter. The revised Plan should incorporate the attached comments.

If you require further assistance, please contact this office. For enquiries of a technical nature, contact Ms Sarah Aho at (867) 669-2402 or Mr. David Milburn at (867) 669-2650 of the Water Resources Division.

Sincerely,

Gordon Wray

Chairman

N.W.T. Water Board

Attach.

P.O. Box 1500, Yellowknife, NT, X1A 2R3, 2nd Floor Goga Cho Building Phone: (867) 669-2772 Fax: (867) 669-2719

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Summary of TAC Comments: Reclamation Plan: Shell Farewell Water System

Overall:

The A&R Plan should cover the entire site, describing the ultimate restoration plans for all site facilities which have the potential to impact water, not just the water systems. This includes the fuel, materials, pipe and drilling materials storage sites, the airstrip, the solid waste disposal site and all other buildings and facilities on site.

- Section 1.1: The A&R Plan is required under the Water Licence issued by the NWT Water Board, not a permit from the GNWT.
- Section 5.2: The statement is made that materials, along with the remaining facilities in the camp accommodation area, would be removed and either partially recycled or disposed of at a local municipal landfill.
 - Which local landfill, and has Shell obtained the municipality's permission to use the landfill to dispose of the solid waste?
- Section 5.3: The statement is made that treatment of lagoon sediment / sludge meets Item 6 Part D of the water licence.
 - Has the Inspector confirmed the acceptance of this method of solid waste disposal?
- Section 5.4: "The final reclamation plan will be chosen based on feedback from the local Government Land Use Inspector." In fact, the final reclamation plan will need to be approved by the NWT Water Board.
- Table 3: Although Table 3 refers to NWT Water Board Criteria as published in the "Guidelines for the Discharge of Treated Municipal Wastewater in the Northwest Territories", not the criteria from the Water Licence, Shell is reminded that the lagoon discharge must meet the criteria established in their Water Licence.