

NORTHWEST
TERRITORIES
WATER BOARD



NUNAPPA
SIVUNIUKPAIT
IMMAKUN

WATER REGISTER: N7L1-1777

September 14, 2005

Mr. Pete Millman
Environmental Planner
Devon Canada Corporation
1600, 324-8th Avenue S.W.
CALGARY, AB T2P 2Z5

Dear Mr. Millman:

2004 ITIGINKPAC F-29 SUMP MONITORING PROGRAM REPORT

Thank you for your May 30, 2005 letter. The Northwest Territories Water Board has reviewed this additional information and has the following comments and requests:

1. In the future, thermistors should be installed taking into account the high potential for failure. Thermistors should be placed in casings filled with a freeze-resistant non-convective fluid. In this regard, should a thermistor probe fail, the thermistor string could be retrieved from the surface and replaced without requiring any additional drilling at the sump. The proponent should be aware that regardless of the installation method, if the integrity of the monitoring program is jeopardized, the proponent will be required to rectify the situation. It is the proponents responsibility to ensure that all thermistor data as required by their Water Licence is collected throughout the duration of the monitoring program. To this effect, the proponent must install thermistors in such a manner that failed thermistors can be easily repaired or replaced.
2. Any modification of the site to address the issue of surface pooling around the sump should be done in consultation with and following approval of the INAC Inspector. The NWTWB looks forward to reviewing the results of the additional work being performed by Devon at the F-29 sump site during the summer 2005.
3. Devon states that the drilling waste at the site was not in a liquid state when disposed of, even at temperatures above 0 degrees Celsius. Furthermore, large quantities of freshwater added to the sump resulted in dilution of the waste. As a result, thawing of the waste will only occur at temperatures at or above 0 degrees Celsius. Devon is making two contradictory statements with respect to the state of the drilling waste. Please clarify how a solid waste mixed with large quantities of freshwater would remain in a solid state even at temperatures above 0 degrees Celsius.

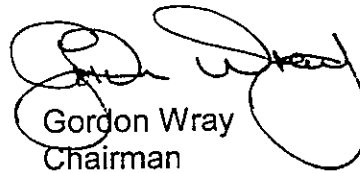
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4. The Northwest Territories Water Board requires that prior to the completion of the mandatory sump monitoring program, the proponent provide Indian and Northern Affairs Canada (INAC) officials with all information necessary to obtain manual ground temperature readings from the established monitoring stations. To this effect, the proponent is to leave all ground temperature monitoring stations and thermistor strings in situ following the completion of the sump monitoring program so that future measurements can be obtained from the site. Please contact Mr. Steven Kokelj at (867) 669-2656 or Mr. Robert Jenkins at (867) 669-2574 of INAC with respect to this requirement.

The Board requests that the required information be submitted for review and approval within forty-five (45) days of the date of this letter.

If you require further assistance, please contact this office. For enquiries of a technical nature, contact Mr. Robert Jenkins at (867) 669-2574 or Dr. Kathleen Racher at (867) 669-2749 of the Water Resources Division.

Sincerely,



Gordon Wray
Chairman
N.W.T. Water Board