



June 18, 2015

Mr. Ramy Rahbani  
Project Manager  
Imperial Oil Resources  
237 Fourth Avenue S.W.  
P.O. Box 2480 Station 'M'  
Calgary, Alberta T2P 3M9

Dear Mr. Rahbani:

**RE: N7L1-1836 – Imperial Oil Resources – BAR C DEW Line/IOL Tununuk Point Remediation Project - Dock Removal**

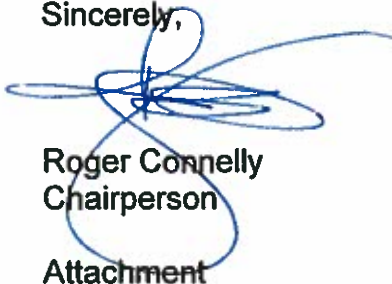
The Inuvialuit Water Board (IWB) has reviewed the amendment request application of May 28, 2015. In accordance with N7L1-1836 Terms and Conditions, the IWB accepts the proposed dock removal as a modification. Water Licence Part F: Conditions Applying to Modifications, allows for modifications to the project if no amendments are required to the scope or terms and conditions of the existing licence.

With this consideration, this additional activity must conform to Part E, Item 9 and wastewater discharges shall not exceed parameters identified in Part E, Item 8. In addition, the IWB requires IOL to include two additional water sampling stations, one upstream of the Bar C dock and one downstream of the Bar C dock. The IWB requires samples daily during the period of the dock removal.

Fisheries and Oceans Canada, in their letter of June 5, 2015 (copy attached), has provided recommendations regarding this additional activity. The IWB is in full support of these recommendations.

Should you have any questions, please do not hesitate to contact Mardy Semmler, IWB Executive Director, at 867-678-8609 or [semmlerm@nwtwb.com](mailto:semmlerm@nwtwb.com).

Sincerely,



Roger Connelly  
Chairperson

Attachment

cc: Philippe Thibert-Leduc, Water Resources Officer - ENR Inuvik



301-5240 50<sup>th</sup> Ave.  
Yellowknife, NT  
X1A 1E2

June 5, 2015

*Your file*      *Voire référence*  
N7L1-1836

*Our file*      *Notre référence*  
15-HCAA-00470

Inuvialuit Water Board  
**Attention: Mardy Semmler**  
Executive Director  
PO Box 2531  
302 – 125 Mackenzie Road  
Inuvik, NT X0E 0T0

Dear Mr. Semmler

**Subject: Comments on Imperial Oil Resources – Bar C Remediation Project – N7L1-1836- Amendment Request and Dock Removal Project Description Report (PDR)**

Fisheries Protection Program (the Program) of Fisheries and Oceans Canada (DFO) – would like to thank the Inuvialuit Water Board (IWB) for the opportunity to provide comments on N7L1-1836- Amendment Request and Dock Removal Project Description Report (PDR) provided by Imperial Oil Resources Ventures Limited (IOL).

As outlined in your request dated May, 28 2015, reviewers are invited to submit comments and recommendations to the NWB by June 5, 2015. IOL's proposal has been reviewed to determine whether it is likely to result in serious harm to fish which is prohibited under subsection 35(1) of the *Fisheries Act*. IOL's proposal has also been reviewed to determine whether it will adversely impact listed aquatic species at risk and contravene sections 32, 33, or 58 of the *Species at Risk Act* (SARA).

Our review has considered the following:

- *Bar-C Tununuk Point Dock Removal Project Detailed Report (PDR)* by IOL (dated May 27, 2015) including:
  - *AECOM Dock Removal Execution Plan (dated May 8, 2015)* with associated engineer drawings and Area H photographic records;
  - *Dock photographs* by Worley Parsons.
- DFO Request for Review form submitted by IOL to DFO Fisheries Protection Program on April 21, 2015.

The Program understands that IOL is proposing to decommission and remove the Imperial barge landing dock at Tununuk Point as part of the Bar-C DEW line site remediation. DFO notes that the decommissioning of the dock will occur and stages and will involve:

- the excavation of fill, removal of the cap plate, bollards, tie-backs and anchor wall;
- the disconnection of the tie-rods and associated hardware on the sheet piles;
- the removal of the main steel sheet piles;
- reshape the shoreline area to closely match the natural contours of the ground profile.

IOL proposes to conduct the sheet pile excavation starting from the downstream end and moving to the upstream end in an effort to minimize silt transport due to the river current. DFO acknowledges IOL's challenges with installing and maintaining a functional silt curtain within the river bed due to the high currents, and as such IOL's plan to have the sheet pile '*remain in place as long as practical and removals staged from the east to minimize dispersal of sediment into the waterway*' is acceptable to DFO as a site isolating measure provided the maximum amount of material will be excavated prior the sheet pile extraction.

To avoid the potential of serious harm to fish, we are recommending that the following mitigation measures be included into IOL's plans:

- Install erosion and sediment control measures (i.e. silt fencing) along the bank in the areas not protected by the sheet pile before starting work, to prevent entry of sediment into the watercourse.
- Stabilize the disturbed shoreline area using effective erosion and sediment control measures.
- Operate machinery in a manner that minimizes disturbance to the watercourse bed and banks.
- Machinery is to arrive on site in a clean condition and is to be maintained free of fluid leaks.
- Wash, refuel and service machinery and store fuel and other materials for the machinery away from the water to prevent deleterious substances from entering the water.

Provided that IOL implements these mitigation measures into their project plans and follows the guidance available on Fisheries and Oceans Canada's (DFO) website at <http://www.dfo-mpo.gc.ca/pnw-ppp/index-eng.html>, the Program is of the view that IOL's proposal will not result in serious harm to fish. The Program is also of the view that IOL's proposal will not contravene sections 32, 33 or 58 of SARA. No formal approval is required from the Program under the *Fisheries Act* or SARA in order for IOL to proceed with its proposal.

Since there are no SARA species or their habitats identified in the project area, no additional approvals under SARA will be required for IOL's proposed activities.

It remains IOL's responsibility to ensure it avoids causing unauthorized *serious harm to fish* in compliance with the *Fisheries Act*, and the IOL meets the requirements under

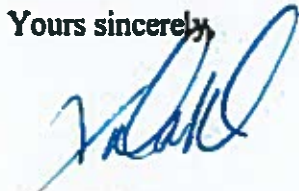
SARA as it may apply to its project. If IOL's plans changed or if the description of its proposal is incomplete, or changes in the future, IOL should consult DFO's website <http://www.dfo-mpo.gc.ca/pnw-ppe/index-eng.html> or consult with a qualified environmental consultant to determine if further review is required by the Program.

Please be advised that it is IOL's *Duty to Notify* DFO if it has caused, or is about to cause, serious harm to fish that are part of or support a commercial, recreational or Aboriginal fishery. Such notifications should be directed to <http://www.dfo-mpo.gc.ca/pnw-ppe/violation-infraction/index-eng.html>.

It remains IOL's responsibility to meet all other federal and territorial requirements that apply to its project.

If you have any questions concerning the above, please contact Mark D'Aguiar at our Yellowknife office by telephone at (867) 669-49211 or by email at [Mark.D'Aguiar@dfo-mpo.gc.ca](mailto:Mark.D'Aguiar@dfo-mpo.gc.ca).

Yours sincerely,



Julie Dahl  
Regional Manager, Regulatory Reviews  
Fisheries Protection Program

CC. Mark D'Aguiar – DFO  
Tobiah Newton – IOL  
Ramy Rahbani – IOL  
Masten Brotsma – WorleyParsons