

February 3, 2016

Inuvialuit Water Board PO Box 2531 Inuvik, NT XOE 0T0

## Dr. Bijaya Adhikari Science and Regulatory Coordinator

Dear Dr. Adhikari:

## Camp Farewell 2015 Closure and Reclamation Plan Summary of Updates

As requested by Dr. Adhikari of the Inuvialuit Water Board via email on November 13, 2015, please find a summary of the updates included in the *Camp Farewell 2015 Closure and Reclamation Plan*. The updates are separated by the closure and reclamation plan sections and are provided below:

1. Section 1.2 Planning Team:

Text changed: "This CRP has been prepared on behalf of Shell by IEG. The following individuals were involved in the preparation and submission of this Plan."

Company	Responsibility	Individual	Role
Shell Canada Energy	Owner	Randall Warren	Decommissioning, Abandonment &
IEG Consultants	Environmental Planning	Nicole Wills	Environmental Scientist

- Section 1.3.1.3 Environment Canada Canadian Wildlife Service (CWS): Text changed: "The Site lies within the Kendall Island Bird Sanctuary (KIBS), under jurisdiction of Environment Canada. Shell holds permit # NT-MBS-15-01. Further detail regarding this permit is discussed in Section 2.2.4."
- Section 1.3.2 Project Understanding: Text added: "- review and update of the 2013 Closure and Reclamation Plan, submitted by IEG to Shell in July, 2013."
- Section 2.1.3 On-Site Facilities: Changes made in its entirety to reflect changes to on-Site facilities. Please see Section 2.1.3 of the Camp Farewell 2015 Closure and Reclamation Plan.

- 5. Section 2.3 Previous Environmental Programs: Text added. Please see Appendix VI of the *Camp Farewell 2015 Closure and Reclamation Plan*.
- Section 2.4.1 Former Sewage Lagoon: Changes made in its entirety to reflect remediation of the former sewage lagoon. Please see Section 2.4.1 of the *Camp Farewell 2015 Closure and Reclamation Plan.*
- 7. Section 2.4.3 Burn Pit:

Text added: "During the 2014 decommissioning program, wood materials not impacted with chemicals were burned in the burn pit. Ash samples collected from the burn pit met the applicable guidelines for landfill disposal."

8. Section 3.3 General Closure Activities:

Text added: "In 2013, the sewage lagoon was remediated and in 2014 the decommissioning and dismantling of site facilities continued with the removal of the camp building, shed #2, and shed #3 building as well as various materials stored on-site. In 2015, the tank farm was demolished and removed and a soil assessment program was conducted."

- Section 3.4.1 Temporary Closure Program Summary General: Changes made in its entirety to reflect activities that occurred from 2013 to 2015. Please see Section 3.4.1 of the *Camp Farewell 2015 Closure and Reclamation Plan.*
- 10. Section 3.4.2.1 Excavation:

Text added: "In 2013, remedial excavation of the sewage lagoon was conducted from July 15 to August 18. Approximately 1,900 m<sup>3</sup> of excavated impacted soil was barged to Hay River and hauled by truck to the Tervita Rainbow Lake Landfill in Rainbow Lake, AB where it was disposed. No other areas were remediated in 2013."

11. Section 3.4.3 Soil Assessment:

Text added: "Results of the 2015 Soil Assessment Program will be included in the Camp Farewell 2015 annual report as well as the updated Closure and Reclamation Plan in 2017."

12. Section 3.5 Temporary Closure Monitoring, Maintenance and Reporting Program: Text added: "Until 2014, the Canadian Wildlife Service (CWS) Migratory Bird Sanctuary permit required that the Site be inspected approximately every 50 days to assess the integrity of the buildings, record visual signs of wildlife and assess any fuel on-site. In 2013, IEG conducted site visits in April, June, July, August, and October (see Site Activities summary, Appendix V) as was documented in IEG's December 2013 Summary Activities letter submitted to the CWS and Shell.

The CWS Migratory Bird Sanctuary permit issued in 2014 did not stipulate site inspections be conducted every 50 days, however, Shell aimed to continue to conduct site inspections as frequently as possible in due diligence. IEG conducted site visits in March and August 2014 (Appendix V).

In 2015, IEG attempted to make a Site visit in February but was unsuccessful due to poor weather. IEG noted Site conditions during the 2015 decommissioning and soil assessment activities."



- 13. Section 4.8.1.1 WFM Dismantling and Decommissioning: Changes made in its entirety to reflect changes to on-Site materials and infrastructure. Please see Section 4.8.1.1 of the *Camp Farewell 2015 Closure and Reclamation Plan*.
- 14. Section 4.8.1.2 WFM Remediation: Text changed: "Details regarding the remediation of the Former Sewage Lagoon in 2013 can be found in Section 2.4.1."
- 15. Section 4.8.1.3 WFM Reclamation: Text changed: "Following remediation activities, the lagoon was backfilled with clean on-site fill material, which was compacted with the use of a dozer, or equivalent piece of equipment, and mounded to account for settling of backfill material. The excavation was left to revegetate naturally. Revegetation of the entire site will be conducted in one event, and is discussed in Section 4.8.4.2."
- 16. Section 4.8.2.1 IEB Dismantling and Decommissioning: Changes made in its entirety to reflect changes to on-Site materials and infrastructure. Please see Section 4.8.2.1 of the *Camp Farewell 2015 Closure and Reclamation Plan.*
- 17. Section 4.8.2.2 IEB Remediation:

Text changed: "A Soil Assessment Program of the lease area and air strip was conducted in 2015. Results of the 2015 Soil Assessment Program will be included in the Camp Farewell 2015 annual report as well as the updated Closure and Reclamation Plan in 2017."

Please note that existing figures and appendices identified within each modified section in the *Camp Farewell 2015 Closure and Reclamation Plan* may have also been updated, and should be referred to for additional information.

If you have any further questions or comments, please don't hesitate to contact me at (403) 730-6809 or nwills@klohn.com.

Yours truly, IEG CONSULTANTS LTD.

Nicole Wills, P.Ag. Project Manager NW c.c.: Randall Warren – Shell Canada Energy

