



August 11, 2021

Chris Boyd, Ph. D.  
Environmental Project Manager, LRO  
Shell Canada Energy  
400 – 4th Avenue SW  
P.O. Box 100 - Station M  
Calgary Alberta T2P 2H5

Dear Dr. Boyd:

**Re: N7L1-1834 - Shell Canada Energy, Camp Farewell – Updated Plans**

The Inuvialuit Water Board (IWB) received the updated Spill Contingency Plan, Emergency Response Plan and Barge Waste Management Plan on August 3, 2021. Upon review, information gaps have been identified. Please provide the following additional information:

1. Spill Contingency Plan:

- a. Shell Canada Energy Environmental Policy related to regulatory compliance, environmental protection, safety, spill response and clean-up;
- b. Details on how to obtain additional copies of the plan (e.g. contact name, address, email and telephone);
- c. Map(s) showing site features such as buildings, roads, culverts, airstrips and other infrastructure; all surface water bodies and direction of water flow including catchment basins; storage locations of each hazardous material; probable spill locations and direction of flow on land and in water; locations of all response equipment; environmentally sensitive areas; any approved disposal sites; topography; and any other important on or off-site features;
- d. List of type and amount of hazardous materials normally stored on-site, the storage capacity and the type and number of storage containers. The storage locations for each of these materials should appear on the map of the site;
- e. Page 2, section 2.1, paragraph 3: Quantify the maximum fuel quantity in the fuel truck that may cause a worst-case scenario;
- f. Page 4, Table 1: Spill Response Contact List – New phone number of GNWT ENR Water Resource Officer, Inuvik is 867-678-6652, confirm with Water Resource Officer and update Table 1;
- g. Page 16, section 10.0, paragraph 1, line 1 states “SDSs have been provided in Appendix C for the materials outlined in Section 2”. Appendix C includes MSDS only for Diesel. As outlined in section 2, MSDS for Lube Oil and Grease and Propane are not included;
- h. If the public may be impacted by a spill, include notification procedures to alert the public; and
- i. Procedures for transferring, storing, and managing spill-related wastes.

2. Emergency Response Plan:

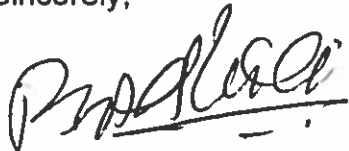
- a. Page 5, Table 3.1: Camp Farewell Emergency Contact List - the last two rows indicate TBD – include Name and Telephone Number of EGT Site Supervisor and On-Site EMT.

3. Barge Waste Management Plan:

- a. Page 2, section 5.1.2 states *"Purge water removed from groundwater monitoring wells during sampling will temporarily be stored in resealable waste drums on-site until the end of the program, then it will be removed for off-site disposal at the Town of Inuvik disposal facility"*. However, the Town of Inuvik waste acceptance letter dated June 16, 2021 for use of Sewage and Solid Waste Dumping Facilities for Camp Farewell Water License (N7L1-1834) states *"...All the waste must be domestic use type only. None of it shall contain any drilling or industrial waste"*. The purge water may be contaminated by the contaminant(s) of potential concern (CoPC) and it may cause harm to the receiving environment. It is recommended that purge water removed from groundwater monitoring wells be properly stored in approved transport containers and shipped to a licensed hazardous waste disposal facility.
- b. Figure 1: Difficult to visualize features depicted on the map – provide an enlarged map that will clearly visualize features depicted on the map.

For further processing of the updated plans, submit the above additional information. The submitted documents including all related IWB correspondence will be placed on the IWB Public Register. Should you have questions or concerns please contact me at (867) 678-8610 or [adhikarib@inuvwb.ca](mailto:adhikarib@inuvwb.ca) or Mardy Semmler, Executive Director, at (867) 678-8609 or [semmlerm@inuvwb.ca](mailto:semmlerm@inuvwb.ca).

Sincerely,



Bijaya Adhikari, PhD  
Science and Regulatory Coordinator

cc: Lloyd Gruben, Water Resource Officer – ENR, Inuvik