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Water Resource Officer
Inuvik Region
Department of Environment and Natural Resources
Government of Northwest Territories

Dear Lloyd Gruben,

Project: N7L1-1836 Bar-C / Tununuk Point Dock Pile Removal
Re: Bar-C Surface Water Monitoring for TPH during Dock Pile Removals Revision

As per Water License N7L1-1836 Part E, Clause 8, Imperial is required to complete surface water monitoring for total suspended solids (TSS), pH and total petroleum hydrocarbons (TPH). These standards were referenced in the Work Execution Plan (Advisian, 2021) prepared for the removal of the remaining sheet piles at the former Imperial dock. This plan was submitted to and approved by the Inuvialuit Water Board (IWB) and includes the methodology for the surface water monitoring.

The monitor used during the 2017 Dock Removal program for measurement of TPH is no longer available nor is an alternate. Without this monitor, a field measurement is not possible and even with rush laboratory analysis, results would not be available for approximately 5 days. In consideration that there are no known TPH impacts in the dock area, Imperial will have its consultant implement the following related to TPH surface water monitoring:

- Baseline sampling: Pre-dock piles removal, samples will be collected (1 location upstream / 2 downstream) for laboratory analysis of BTEX, F1-F2 PHCs
- End of fieldwork sampling: Post-dock piles removal, samples will be collected (1 location upstream / 2 downstream) for laboratory analysis of BTEX, F1-F2 PHCs

Results of these laboratory samples will be provided to the GNWT and IWB within an overall Dock Pile Removal Summary and/or the IWB Annual Report.

As outlined in the Work Execution Plan, there will be a spill mitigation program (i.e. drip trays while stationary, safe fuelling practices, etc.) and spill supplies (such as a recovery boom and adsorption pads) available at site. Should an accidental TPH-related release occur then Imperial will remediate the area. If this release occurs on water, then water sampling will be completed for BTEX, F1-F2 PHCs with the results reported to the GNWT and IWB.

Please advise of any questions and provide written confirmation that this approach is acceptable to the GNWT. Don't hesitate to contact me by phone (587-476-2878) or email (Benjamin.fraser@esso.ca).

Kind regards,

A handwritten signature in black ink, appearing to read "Benjamin Fraser".

Benjamin Fraser

Cc Mardy Semmler – Inuvialuit Water Board
Bijaya Adhikari – Inuvialuit Water Board