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December 22, 2022

File: MV2022X0018

Mark Cliffe-Phillips
Mackenzie Valley Review Board
200 Scotia Centre
Box 938, 5102-50th Avenue
Yellowknife NT X1A 2N7

Sent by email

Dear Mark Cliffe-Phillips,

Re: Strategic oil and Gas Ltd. – Notice of Preliminary Screening Determination – Application for Land Use Permit – Miscellaneous – Cameron Hills, NT

The Mackenzie Valley Land and Water Board (Board) met on December 21, 2022 and considered the Application Package from Strategic Oil & Gas Ltd. (Strategic) for Land Use Permit (Permit) MV2022X0018 for the Cameron Hills (Project) in accordance with the *Mackenzie Valley Resource Management Act* (MVRMA).

The Board conducted a preliminary screening based on the public record for the proceeding. Based on the evidence provided, the Board is satisfied the screening has been completed according to section 125 of the MVRMA and has decided **not to refer** the Project to environmental assessment. The Board's Preliminary Screening Determination and Reasons for Decision, as required by section 121 of the MVRMA, is attached.

If the Board does not receive notice of referral to environmental assessment, it can proceed with issuance of Permit MV2022X0018 on **Tuesday, January 3, 2023**.

The Board and staff look forward to continued communications throughout the pause period. Please contact Shelagh Montgomery via email or at (867) 766-7457 with any questions or concerns regarding this letter.

Yours sincerely,

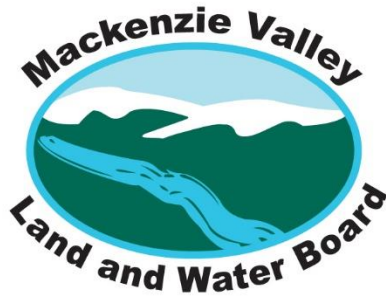


Mavis Cli-Michaud

Chair, Mackenzie Valley Land and Water Board

BCC'd to: Dehcho ORS Distribution List
 Duncan MacRae – Strategic Oil & Gas Ltd. c/o Alvarez & Marsal Canada Inc.
 Norman McCowan – Inspector, GNWT-Lands
 Jayda Robillard – Inspector, GNWT-Lands
 Lorraine Seale – Director, GNWT-Lands
 Pauline DeJong – Executive Director, OROGO

Attached: Preliminary Screening Determination and Reasons for Decision



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Preliminary Screening Determination and Reasons for Decision

Land Use Permit Application	
File Number	MV2022X0018
Company	Strategic Oil and Gas Ltd.
Project	Abandonment, Remediation, and Reclamation of the Cameron Hills field
Location	Cameron Hills, NT
Activity	Miscellaneous
Date of Decision	December 21, 2022

1.0 Decision

In accordance with subsection 124(1) of the *Mackenzie Valley Resource Management Act* (MVRMA), the Mackenzie Valley Land and Water Board (MVLWB or Board) met on December 21, 2022 to make a preliminary screening determination on the Applications from Strategic Oil and Gas Ltd. (Strategic; the Applicant) for Land Use Permit MV2022X0018 (Permit)¹ for the closure and reclamation of the Cameron Hills field (Project).²

The Board has determined that some Project activities and areas are exempt from preliminary screening, because they were previously screened or underwent an Environmental Assessment (EA). The Applicant has proposed new Project activities and/or areas, however, the Board has decided not to refer the

¹ See MVLWB Online Registry [www.mvlwb.com] for [Strategic - Updated Permit Application Form - Nov4 22](#).

² The Project is the closure and reclamation of the Cameron Hills field, which is the proposed development, where “development” is defined in Part 5 of the MVRMA as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

proposed changes to the Project to the Mackenzie Valley Environmental Impact Review Board (the Review Board) for Environmental Assessment because, based on the evidence, it is the Board’s opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern.

The Board’s determination, including reasons for its decision, are detailed in sections [3.0](#) and [4.0](#).

2.0 List of Defined Terms and Acronyms

Applicant	Strategic Oil and Gas Ltd.
Application	The complete application package submitted by the Applicant for Land Use Permit MV2022X0018.
Board	Mackenzie Valley Land and Water Board
DCFN	Dehcho First Nations
EA	Environmental Assessment
GNWT	Government of the Northwest Territories
GNWT-ENR	Government of the Northwest Territories – Environment and Natural Resources
GNWT-Lands	Government of the Northwest Territories – Department of Lands
MVLWB	Mackenzie Valley Land and Water Board
MVRMA	<i>Mackenzie Valley Resource Management Act</i>
ORS	Online Review System (www.new.onlinereviewssystem.ca)
Party	As per the MVLWB Rules of Procedures , an applicant, a person, or an organization participating in the regulatory proceeding for the Application.
Project	Closure and reclamation of the Cameron Hills field, which is the proposed development (as defined in Part 5 of the MVRMA). ³
Review Board	Mackenzie Valley Environmental Impact Review Board
Standard Permit Conditions	MVLWB Standard Land Use Permit Conditions Template
WMP	Waste Management Plan

3.0 Background and Scope of Screening

On October 11, 2022, Strategic Oil and Gas Ltd. (the Applicant) applied for a Type A Land Use Permit (Permit) to conduct the following activities relating to abandonment, remediation, and reclamation:

- Downhole abandonment of wells.
- Surface abandonment of wells (cut-and-cap).
- Removal of surface infrastructure (buildings, wellheads, aboveground pipes, tanks).
- Remediation and reclamation, as required, of well sites, sumps, H-03 battery, camps, lagoons, surface water run-off ponds, quarries, access roads, bridges, and ancillary sites.

³ “development” is defined in Part 5 of the MVRMA as:

“any undertaking, or any part or extension of an undertaking, that is carried out on land or water and includes an acquisition of lands pursuant to the *Historic Sites and Monuments Act* and measures carried out by a department or agency of government leading to the establishment of a park subject to the *Canada National Parks Act* or the establishment of a park under a territorial law.”

The Cameron Hills field is located southwest of Hay River, south of Tathlina Lake, and extends to the Alberta and NWT Border. There is a separate single-well (M-31) parcel to the east of the Field. The Permit is to cover the Cameron Hills field and Well M-31, collectively known as the Cameron Hills site.

There are 44 suspended wells that are to be abandoned, which are scheduled to be carried out over the following three winter seasons as follows:

- Q4 2022/Q1 2023 – 24 wells;
- Q4 2024/Q1 2025 – 17 wells; and
- Q4 2025/Q1 2026 – 3 wells including Battery Site.

Reclamation will begin immediately, where possible, following abandonment, and continue into 2027, including monitoring. For those locations requiring remediation, reclamation will be instituted.

The program components would take place during the summer/fall or winter months depending on the activity, between 2022 – 2027. Initiating the on-site activities will depend on site conditions, availability of equipment, and logistical constraints. A term of five years is requested for the Permit.

An Engagement Record and Engagement Plan were included in the Application. The Applicant noted they engaged with the following Parties:

- Deh Gáh Got'ıę First Nation
- Dene Tha' First Nation
- Fort Providence Métis Council
- Ka'a'gee Tu First Nation
- K'atl'odeeche First Nation
- Northwest Territory Métis Nation
- West Point First Nation

The Engagement Record included details of engagement that occurred with Parties pre-submission of the Application. Specifically, the 2022 record included details of the various meetings (in-person and virtual), and discussions focused on future engagement and employment opportunities.

The Application includes proposed changes to the Project. Under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the MVRMA, project areas and activities that have already been subject to Part 5 of the MVRMA are exempt from preliminary screening. The new Project area requires screening by the Board in accordance with subsection 124(1) of the MVRMA.

In accordance with paragraph 125(1)(a) of the MVRMA, the Board must conduct a preliminary screening of the proposed changes to the Project to determine and report to the Review Board whether, in its opinion, the proposed changes to the Project might have a significant adverse impact on the environment or might be a cause of public concern. The details of the Board's analysis are set out in section [4.0](#) below.

3.1 Scope of Screening:

Previously Screened or Assessed Areas and Activities:

The Cameron Hills field

The Cameron Hills⁴ field has a long history of exploration, development, production, and abandonment activities.

Paramount Resources Ltd. applied for a new Permit MV2000A0041 that included drilling 9 new wells, conduct work at 7 existing wells, and 10 future wells. The development was referred to Mackenzie Valley Environmental Impact Review Board (MVEIRB) for an Environmental Assessment (EA) by the Board on November 20, 2000. On October 16, 2001, MVEIRB issued its Report of Environmental Assessment and Reasons for Decision⁵, which included a list of 'Commitments Made by Paramount' and outlined in Attachment 1. EA00-004 outlined the scope of the principal development as:

The principal development activities are drilling, completing and testing 9 new wells.

The scope also covered the accessory development and activities required to support completion of the principal activities.

Paramount Resources Ltd. applied for a new Permit MV2000P0055 to construct a pipeline and gathering system, including an assortment of supporting facilities. On August 1, 2001, MVEIRB decided to conduct an EA on the development as the Boards preliminary screening had only included those parts of the development that were within the Mackenzie Valley only and not the parts that continued into Alberta. On December 3, 2001, MVEIRB issued its Report of Environmental Assessment and Reasons for Decision. A revised Report of Environmental Assessment was released on January 8, 2002⁶, which included twenty-one measures to mitigate potential adverse impacts upon the environment and outlined in Attachment 1. EA01-005 outlined the scope of the principal development as:

The proposed development includes the Amended Development Plan and the construction and operation of the facilities, up to and including abandonment, required to extract oil and natural gas, transport it via a gathering system to a central battery, and then transport it in a transboundary pipeline to a connection point with a provincially regulated gathering system pipeline in Alberta.

The scope also covered the accessory development and activities required to support completion of the principal activities.

Paramount Resources Ltd. applied for amendments to a Permit MV2002A0046 and a Water License MV2002L1-0007 to the Board on April 22, 2003. On May 28, 2003, the Board referred the applications,

⁴ Cameron Hills field, as bounded to the location identified in [Figure 1 of EA03-005](#).

⁵ See Review Board Online Registry (www.reviewboard.ca) for Cameron Hills Exploratory Drilling Project – EA00-004 – [Report of Environmental Assessment](#).

⁶ See Review Board Online Registry (www.reviewboard.ca) Cameron Hills Gathering System – EA01-005 – [Revised Report of Environmental Assessment](#).

citing the potential for public concern and significant environmental impacts related to cumulative effects, to MVEIRB for an EA.

On June 1, 2004, MVEIRB issued its Report of Environmental Assessment and Reasons for Decision⁷, which included seventeen recommended measures to mitigate potential adverse impacts upon the environment. A consult to modify process, pursuant to section 131(1) of the MVRMA resulted in changes to the wording of most of the recommended measures; MVEIRB ruled that the intent of the original measures was not altered. On July 5, 2005, the federal Minister approved EA03-005 with the modified measures. EA03-005 outlined the scope of the proposed development as:

The scope of the development includes the elements of the proposed development that will be considered in the EA. The scope of development takes into account both principal and accessory development activities.

The scope of the development for this EA was limited to the description presented in the DAR and the developer's presentation at the public hearing, as amended in response to the questions of the Review Board and parties. The scope of the development assessed determines the activities of which can be undertaken, pursuant to any subsequent land use permit or other regulatory instruments. These may not exceed the scope of the EA without the need for further preliminary screening.

And the scope of the environmental assessment as:

After considering the relevant information available on the public record, the Review Board decided on the scope of assessment. The scope of the assessment focused on the cumulative effects of drilling, testing and tie-in of up to 50 additional wells over a period of 10 years, production of oil and gas over 15 to 20 years, and abandonment and reclamation of the entire development.

The Cameron Hills field, that constitutes the focus of activity for Permit MV2022X0018 was operated at various times by Paramount Resources Ltd., and now administered by Strategic. They are also represented in Permit MV2013A0010. The latter Permit included a variety of activities, including construction, operation, maintenance, abandonment, and associated remediation and reclamation. In Appendix 2 of the submitted application for Permit MV2013A0010, was a list of 54 well sites that were identified as being included in EA03-005.⁸ Prior to EA03-005, there were 39 well sites in the Cameron Hills field; these are referred to as the "baseline case". The application which was referred to EA contained five well sites; this is known as the "application case". EA03-005 was scoped for cumulative effects and included these "baseline case" and "application case" well sites, and the additional potential for a "future case" of 48 well sites [39+5+48 = 92].

⁷ See Review Board Online Registry (www.reviewboard.ca) for Cameron Hills Extension Project – EA03-005 – [Report of Environmental Assessment](#).

⁸ See MVLWB Online Registry for MV2013A0010 - Strategic Oil and Gas - [New Application](#) - May27-13.

Permit MV2013A0010 was a consolidated of 19 Permits into one comprehensive Permit, issued by the Board on September 19, 2013. In their decision, the Board confirmed that the Permit was exempt from preliminary screening pursuant to Paragraph 2.1 of the Exemption List Regulations:

The activities included in the scope of the comprehensive LUP were contemplated under the Mackenzie Valley Environmental Impact Review Board (Review Board) Environmental Assessment (EA) 03-005. On June 1, 2004 the Review Board concluded, pursuant to paragraph 128(b)(ii) of the Mackenzie Valley Resource Management Act (MVRMA), that given the implementation of measures and commitments identified in the Report of EA, the proposed development would not likely have significant adverse environmental impacts or be a cause of significant public concern. A process to modify some of the recommended measures ensued. On July 5, 2005 the federal Minister approved EA03-005 (as modified) with 17 recommended measures.

As the activities in the comprehensive LUP application are within the scope of EA 03-005, and the proposed development has not been modified since the requirements of Part 5 of the MVRMA were fulfilled, the MVLWB confirmed on September 19, 2013 that the LUP application was exempt from.

The authorization history of the consolidated 19 Permits of the Cameron Hills field, as they relate to Permit MV2013A0010, is detailed in Table 1.

Table 1: Authorization History of the consolidated 19 Permits for the Cameron Hills field as related to Permit MV2013A0010

Previous Permit	Date Issued	Expiration	Scope of Permit	Components Screened?
MV2005A0030	Oct. 13, 2006	Oct. 13, 2013 (Mar. 17, 2011)	access, drilling, completion, and evaluation of 6 wells (B-09, A-19, E-72, H-06, L-40, P-08), development of production facilities, and the construction of associated pipeline, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2006A0030 (Renewal of MV2002A0046)	Dec. 21, 2006	Dec. 20, 2013 (Jun. 9, 2011)	access, drilling, completion, re-entry, and evaluation of 9 wells (D-49, M-49, H-58, L-47, E-07, L-29, L-73, J-04, J-74), development of production facilities, and the construction of associated pipelines and production operations.	Determined to be exempt from preliminary screening (renewal and MV2002A0046 was within scope of EA03-005).
MV2006A0032 (renewal of MV2000A0041)	Dec. 21, 2006	Dec. 20, 2013 (Jun. 9, 2011)	access, drilling, completion, re-entry, and evaluation of 9 wells (H-03, I-73, K-19, F-19, C-74, K-74, O-19, F-73, F-75), development of production facilities, and the	Determined to be exempt from preliminary screening (renewal and MV2000A0041 was within scope of EA00-004).

Previous Permit	Date Issued	Expiration	Scope of Permit	Components Screened?
			construction of associated pipelines and production operations.	
MV2006P0033 (renewal of MV2000P0055)	Dec. 21, 2006	Dec. 20, 2013 (Jun. 9, 2011)	access roads, bridges, pipelines, power lines, and fuel lines on existing right-of-way, airstrip, campsites, borrow pits/water wells, a satellite site, a battery site and a radio communication system with towers, drilling, completion, re-entry, evaluation of 27 wells (A-73, C-50, N-28, J-37, C-19, A-05, B-25, L-47, L-44, F-19, K-19, O-19, K-74, C-74, 2C-74, I-74, I-73, M-73, H-03, 2M-73, B-08, I-16, F-73, 2F-73, C-75, B-38, C-16) construction of pipelines, fuel lines and production operations.	Determined to be exempt from preliminary screening (renewal and MV2000P0055 was within scope of EA01-005).
MV2006A0040	Apr. 27, 2007	Apr. 26, 2014 (Mar. 11, 2012)	construct and maintain well M-74 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Preliminary screening conducted April 26, 2007 .
MV2007A0002	Apr. 27, 2007	Apr. 26, 2014 (Mar. 11, 2012)	construct and maintain well A-04 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Preliminary screening conducted April 26, 2007 .
MV2009A0033	Nov. 9, 2009	Nov. 8, 2014	construct and maintain well B-11 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2009A0034	Nov. 9, 2009	Nov. 8, 2014	construct and maintain well P-17 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2009A0035	Nov. 9, 2009	Nov. 8, 2014	construct and maintain well F-77 and associated access road, pipeline, fuel, and power right-of-	Determined to be included within the Planned Development Case included in EA03-005.

Previous Permit	Date Issued	Expiration	Scope of Permit	Components Screened?
			ways, including reclamation and abandonment.	
MV2009A0036	Nov. 9, 2009	Nov. 8, 2014	construct and maintain well I-72 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2009A0037	Nov. 9, 2009	Nov. 8, 2014	construct and maintain well L-09 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2009A0050	Jan. 21, 2010	Jan. 20, 2015	construct and maintain well N-06 and associated access road, pipeline, fuel, and power right-of-ways, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2009A0052	Feb. 18, 2010	Feb. 17, 2015	access and maintenance of well A-68.	Determined to be included within the Planned Development Case included in EA03-005.
MV2010A0005	Jan. 7, 2010	Jan. 6, 2015	testing, maintenance, production, and re-completion of well G-21, including reclamation and abandonment	Determined to be included within the Planned Development Case included in EA03-005.
MV2010A0049	Dec. 22, 2010	Dec. 21, 2015	construction of access road, well site, and pipeline right-or-way, drilling, testing, maintenance, production, and completion/re-completion of well 2H-03, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2010A0050	Jan. 7, 2010	Jan. 6, 2015	Construction, operation, and maintenance of up to 20 sumps at 5 sites, including abandonment and reclamation.	Determined to be included within the Planned Development Case included in EA03-005.
MV2010A0051	Dec. 22, 2010	Dec. 21, 2015	construction of access road, well site, and pipeline right-or-way, drilling, testing, maintenance, production, and completion/re-completion of well E-52, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.
MV2010A0052	Dec. 22, 2010	Dec. 21, 2015	construction of access road, well site, and pipeline right-or-way, drilling, testing, maintenance,	Determined to be included within the Planned

Previous Permit	Date Issued	Expiration	Scope of Permit	Components Screened?
			production, and completion/re-completion of well H-72, including reclamation and abandonment.	Development Case included in EA03-005.
MV2010A0054	Jan. 7, 2010	Jan. 6, 2015	construction of access road, well site, and pipeline right-of-way, drilling, testing, maintenance, production, and completion/re-completion of well E-73, including reclamation and abandonment.	Determined to be included within the Planned Development Case included in EA03-005.

Well M-31

Included in the scope of work of the application to Permit MV2022X0018 was the abandonment and reclamation activities of Well M-31. This site, which was developed under the authority of Land Use Permit N79A960, was drilled in February 1979, and subsequently suspended. The well is located between the Cameron Hills field and NWT Highway No. 1; 21.0 Km east of the Battery Site and 9.2 Km west of the highway near Km 2.3.

Paramount Resources Ltd. applied for a new Permit MV2005B0021 for a 2D geophysical program in SDL8, which crosses through the area of Well M-31. The development was referred to MVEIRB for an EA by Indian and Northern Affairs Canada on November 23, 2005. On November 14, 2006, MVEIRB issued its Report of Environmental Assessment and Reasons for Decision⁹, which included 2 measures and 8 suggestions to mitigate potential adverse impacts upon the environment. EA0506-007 outlined the scope of assessment as:

The Review Board defined the scope of Environmental Assessment EA0506-007 as those activities specifically occurring on the SDL8 area, or activities that were directly linked to the program, such as mobilization of resources and gaining access to the project site. However, this limitation was applied to the assessment of direct impacts from the proposed development only, not to the assessment of potential cumulative impacts in the larger area. For assessing impacts on the socio-economic environment, such as harvesting, the geographical scope of this assessment considered those NWT communities who claim to have traditionally used the SDL8 area.

The temporal boundaries for this EA were established to consider potential future impacts, rather than just those potential impacts expected to occur during the operation phase of the SDL8 program. Therefore, the temporal scope was determined to include all phases of the SDL8, from mobilization to post-operation, until such time that no potential significant adverse impacts attributable to the Development are predicted to occur.

⁹ See Review Board Online Registry (www.reviewboard.ca) Cameron Hills Gathering System – EA01-005 – [Revised Report of Environmental Assessment](#).

Access to Well M-31 was confirmed to follow the route as assessed in EA0506-007.

Activities that the Board understands to have been previously considered,¹⁰ and which therefore do not require preliminary screening at this time, are listed below:

- Cameron Hills field, including all supporting infrastructure, as bounded to the location identified in Figure 1 of EA03-005.
- Access to Well M-31 as bounded to the location identified in Figure 2 of EA0506-007.

New Areas and Activities:

The activities that the Board has determined to require a preliminary screening, based on the scope of work as applied for, is the abandonment and reclamation activities associated with Well M-31.

3.2 Public Record and Regulatory Proceeding

To assist the Board in its preliminary screening determination for the Project, the Board distributed the Application and a draft Permit for public review on November 10, 2022, inviting reviewers to provide comments and recommendations on the Applications and the preliminary screening (e.g., on impacts and mitigation measures) using the Online Review System (ORS). Comments were due December 1, 2022, with responses from the Applicant due December 8, 2022. The Board received comments and recommendations from the Government of the Northwest Territories Department of Lands (GNWT-Lands), GNWT Office of the Regulator of Oil and Gas Operations (GNWT-OROGO), GNWT Department of Environment and Natural Resources (GNWT-ENR) (attached).¹¹ Board staff also submitted comments and questions for the purposes of clarification.

Since there were no requests to extend the reviewer comment deadline, the Board is satisfied that a reasonable period of notice was given to affected communities and First Nations, as required by subsection 63(2) of the MVRMA.

Pursuant to Schedule 4.1 of the Northwest Territory Métis Nation (NWTMN) Interim Measures Agreement, the Board determined that written notice was given to the NWTMN and that a reasonable period of time was allowed for NWTMN to make representations with respect to the Application.

Pursuant to section 27, paragraphs (a) and (b) of the Dehcho First Nations (DCFN) Interim Measures Agreement, the Board has determined that written notice was given to the DCFN, and that a reasonable period of time was allowed for DCFN to make representations with respect to the Application.

¹⁰ See Review Board Online Registry for Report of Environmental Assessment for [EA03-005](#) and [EA0506-007](#).

¹¹ See MVLWB Online Registry for Strategic Oil and Gas Ltd. – [Review Comment Summary Table](#) – Dec21_22.

4.0 Potential Impacts and Proposed Mitigations

Table 2 below summarizes:

- the potential impacts of the proposed Project;
- the concerns that were identified during the regulatory proceeding and how the Applicant addressed those concerns;
- the proposed and potential mitigations for the potential impacts; and
- the Board's analysis of the potential impacts and proposed mitigations.

Table 2: Potential Impacts and Proposed Mitigations for the Proposed Project

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
Soil Contamination	Reclamation, Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Fuel vehicles will be equipped with well maintained hoses, nozzles and pumps to prevent accidental spillage. • Parked equipment will be inspected during a daily walk-around to identify and manage signs of spills or leaks. • Care will be taken during refuelling. Drip tray and absorbent pans will be used to capture minor spills and drips while fuelling equipment. • The drip trays will be monitored for fluid levels and replaced as necessary. • Fuel caches will be set-back a minimum of 100 m from the high-water mark of any water body or watercourse. • Strategic has developed an Emergency Response Plan and Corporate Spill Response Contingency Manual (refer to Appendix • 5) that will be adhered to throughout the course of the Program. • Spill kits will be kept on-site during operations. Spill response equipment includes waste bags, absorbent pads, and shovels. • In the event of a spill, Strategic will implement spill reporting, cleanup and sampling as per regulations and requirements. • Should a spill occur, Strategic will endeavour to clean-up the spill before infiltration occurs. • Spills, regardless of volume, will be documented and records kept by Strategic. • Should a regulatory reportable spill occur, the NT/NU 24-hour Spill Report Line will be contacted at (867) 920-8130, or alternatively the NT/NU Spill Report Form will be completed and emailed to spills@gov.nt.ca <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, and FINAL CLEANUP AND RESOTRATION.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
Soil Compaction	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Program activities are to take place on previously cleared locations, minimizing additional vegetation removal and related potential effects to terrain, soils, and vegetation. The intent of the Program is to complete downhole abandonment and reclamation activities for the forty-four wellsite’s and associated infrastructure. • Strategic will conduct abandonment activities during appropriate weather conditions (e.g., frozen ground and snow cover) to prevent risk of impacts to the ground. • Reclamation activities will be conducted upon successful completion of abandonment and, if needed, remediation activities. <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include OFF-ROAD VEHICLE TRAVEL, PREVENTION OF RUTTING, SUSPEND OVERLAND TRAVEL, VEHICLE MOVEMENT FREEZE-UP.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Destabilization /erosion	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Only existing crossings will be utilized or repaired/built for reuse. • If ground disturbance does occur, it will be re-contoured and reseeded with an approved mix and inspected within one full growing season. • Remediation activities involving ground disturbance will be separately proposed on a location-specific basis with appropriate soil and erosion management. • Where the potential for erosion exists, erosion protection materials (such as coconut matting, silt fencing, and/or rip-rap) will be installed <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include PARALLEL WATERCOURSE SETBACK, PERMAFROST PROTECTION, NATURAL DRAINAGE, PROGRESSIVE EROSION CONTROL, REPAIR EROSION, PREVENTION OF RUTTING, SUSPEND OVERLAND TRAVEL, STREAM BANKS, EQUIPMENT: WATERCOURSE BUFFER, EXCAVATION SETBACK, DRILLING NEAR WATER OR ICE, MINIMIZE AREA CLEARED, PRE CONSTRUCTION PROFILES, FINAL CLEANUP AND RESTORATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
Inability to support vegetation	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Remediation activities involving ground disturbance will be separately proposed on a location-specific basis with appropriate erosion management. • If bare areas are identified after a full growing season, and are not due to contamination, mechanical decompaction may be used to increase soil porosity, create microsites, and allow water infiltration. • Seeding or tree-planting may also be used to reduce bare areas, with prior approval. <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include OFF-ROAD VEHICLE TRAVEL, PREVENTION OF RUTTING, SUSPEND OVERLAND TRAVEL, VEHICLE MOVEMENT FREEZE-UP, HABITAT DAMAGE, WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, and FINAL CLEANUP AND RESOTRATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Changes in groundwater quality	Reclamation	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Fuel vehicles will be equipped with well-maintained hoses, nozzles and pumps to prevent accidental spillage. • Parked equipment will be inspected during a daily walk-around to identify and manage signs of spills or leaks. • Care will be taken during refueling. Drip tray and absorbent pans will be used to capture minor spills and drips while fueling equipment. The drip trays will be monitored for fluid levels and replaced as necessary. • Strategic has developed an Emergency Response Plan including Spill Response (refer to Appendix 5) that will be adhered to throughout the course of the Program. • Spill kits will be kept on-site during operations. Spill response equipment includes waste bags, absorbent pads, and shovels. • In the event of a spill, Suncor will implement spill reporting, clean-up and sampling as per regulations and requirements. 	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<ul style="list-style-type: none"> • Should a spill occur, Strategic will endeavour to clean-up the spill before infiltration occurs. • Spills, regardless of volume, will be documented and records kept by Strategic. • Should a regulatory reportable spill occur, the NT/NU 24-hour Spill Report Line will be contacted at (867) 920-8130, or alternatively the NT/NU Spill Report Form will be completed and emailed to spills@gov.nt.ca <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, OIL AND GAS DRILLING CHEMICALS, DRILLING WASTE, DRILLINGS WASTE DISPOSAL, DRILLINGS WASTE CONTAINMENT, WASTE CHEMICAL DISPOSAL, WASTE PETROLEUM DISPOSAL, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, SECONDARY CONTAINMENT – REFUELLING, SEAL OUTLET, FINAL CLEANUP AND RESTORATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	
Loss or change in extent of permafrost	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • The worksites will be monitored for melting permafrost from solar exposure and rutting. • Erosion repairs will be made as required to protect the permafrost. • Program activities are to take place on previously cleared locations, minimizing additional vegetation removal and related potential effects to terrain, soils, and vegetation. The intent of the Program is to complete final abandonment and remediation activities followed by reclamation of Program access, wellsites and infrastructure areas. During winter activities, frozen ground conditions will mitigate potential damage to surface soils and permafrost. • Winter road construction will use lake and river ice and compacted snow cover on land surfaces for transportation of needed equipment. <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include PERMAFROST PROTECTION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
Flow or level changes or surface water	Reclamation	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Strategic will adhere to the permitted use of water sources as per WL MV2010L1-0001. • Domestic water may be drawn from Water Source 3 (nearest to Main Camp). • Bottled drinking water will be and transported to the Program site unless a treatment system is proposed and approved. • All watercourse crossings will adhere to the Northern Land Use Guidelines – Access: Roads and Trails (GNWT, 2015d). <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include NATURAL DRAINAGE, PROGRESSIVE EROSION CONTROL, REPAIR EROSION, DRY FORDING, EQUIPMENT: WATER COURSE BUFFER, EXCAVATION SETBACK, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Changes in surface water quality	Reclamation	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Materials will not be stored on the surface ice of water bodies or within 100m of the normal high-water mark to minimize the potential for contamination of water resources. • Parked equipment will be inspected during a daily walk-around to identify and manage signs of spills or leaks. • Drip trays and absorbent pans will be used to capture minor spills and drips while fueling equipment. The drip trays will be monitored for fluid levels and replaced as necessary. Care will be taken during refueling. • Fuel caches will be set-back a minimum of 100 m from the high-water mark of any waterbody or watercourse. • Strategic has developed an Emergency Response Plan including Spill Response (refer to Appendix 5) that will be adhered to throughout the course of the Program. • Spill kits will be kept on-site during operations. Spill response equipment includes waste bags, absorbent pads, and shovels. • If a spill occurs, Strategic will implement spill reporting, clean-up and sampling as per regulations and requirements. • Spills, regardless of volume, will be documented and records kept by Strategic. 	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<ul style="list-style-type: none"> • Should a regulatory reportable spill occur, the NT/NU 24-hour Spill Report Line will be contacted at (867) 920-8130, or alternatively the NT/NU Spill Report Form will be completed and emailed to spills@gov.nt.ca. • If a spill does occur, Strategic will endeavour to clean-up the spill before infiltration occurs. • Effort will be made to avoid wetlands during summer/fall operations • Ice thickness will be tested prior to watercourse crossings during winter operations. • Operations will not be conducted within 30 m of any waterbodies not being crossed. • Waste will be managed in accordance with the Program WMP (refer to Appendix 6). <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include NATURAL DRAINAGE, PROGRESSIVE EROSION CONTROL, REPAIR EROSION, DRY FORDING, EQUIPMENT: WATER COURSE BUFFER, EXCAVATION SETBACK, WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, OIL AND GAS DRILLING CHEMICALS, DRILLING WASTE, DRILLINGS WASTE DISPOSAL, DRILLINGS WASTE CONTAINMENT, WASTE CHEMICAL DISPOSAL, WASTE PETROLEUM DISPOSAL, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, SECONDARY CONTAINMENT – REFUELLING, SEAL OUTLET, FINAL CLEANUP AND RESTORATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p> <p>The Board also included the non-standard condition CROSSINGS.</p>	
Changes to aquatic habitat	Reclamation	<ul style="list-style-type: none"> • Effort will be made to avoid wetlands during summer/fall operations. Materials will not be stored on the ice surface of waterbodies or within 100m of the normal high-water mark to minimize the potential for contamination of water resources. • Parked equipment will be inspected during a daily walk-around to identify and manage signs of spills or leaks. • Drip trays and absorbent pans will be used to capture minor spills and drips while fueling equipment. The drip trays will be monitored for fluid levels and replaced as necessary. Care will be taken during refueling. • Fuel caches will be set-back a minimum of 100 m from the normal high-water mark of any water 	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<p>body or watercourse.</p> <ul style="list-style-type: none"> • Strategic has developed an Emergency Response Plan and Corporate Spill Response Contingency Manual (refer to Appendix 5) that will be adhered to throughout the course of the Program. • Spill kits will be kept on-site during operations. Spill response equipment includes waste bags, absorbent pads, and shovels. • If a spill occurs, Strategic will implement spill reporting, clean-up and sampling as per regulations and requirements. • Spills, regardless of volume, will be documented and records kept by Strategic. • Should a regulatory reportable spill occur, the NT/NU 24-hour Spill Report Line will be contacted at (867) 920-8130, or alternatively the NT/NU Spill Report Form will be completed and emailed to spills@gov.nt.ca. • If a spill does occur, Strategic will endeavour to clean-up the spill before infiltration occurs. • Effort will be made to avoid wetlands during summer/fall operations. • Ice thickness will be tested prior to watercourse crossings during winter operations. • Domestic water may be drawn from Water Source 3 (nearest to Main Camp). • Bottled drinking water will be and transported to the Program site unless a treatment system is proposed and approved. • Program activities will be conducted during appropriate seasons to minimize activity during critical periods for wildlife (fall spawning). • Operations will not be conducted within 30 m of any waterbodies not being crossed. • Waste will be managed in accordance with the Strategic’s WMP (refer to Appendix 6). <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include NATURAL DRAINAGE, PROGRESSIVE EROSION CONTROL, REPAIR EROSION, DRY FORDING, EQUIPMENT: WATER COURSE BUFFER, EXCAVATION SETBACK, WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, OIL AND GAS DRILLING CHEMICALS, DRILLING WASTE, DRILLINGS WASTE DISPOSAL, DRILLINGS WASTE CONTAINMENT, WASTE CHEMICAL DISPOSAL, WASTE PETROLEUM DISPOSAL, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, SECONDARY CONTAINMENT – REFUELLING, SEAL OUTLET, FINAL CLEANUP</p>	<p>and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<p>AND RESTORATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	
Increased greenhouse gases	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Program activities are not anticipated to have deleterious effects on air, climate, or atmosphere. Temporary use of gasoline or diesel equipment, which will emit greenhouse gases, are necessary to conduct the Program. 	Based on the impact description, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Direct loss of vegetation	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Program activities are located on previously cleared locations, minimizing additional vegetation removal and related potential effects to terrain, soils, and vegetation. <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include WINTER ROADS, PROGRESSIVE EROSION CONTROL, REPAIR EROSION, and HABITAT DAMAGE.</p> <p>The Board also included non-standard conditions including WILDLIFE HABITAT.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Introduction of non-native (invasive) species	Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Care will be taken to clean equipment prior to mobilization into the Program area to limit the likelihood of the introduction of non-native species. 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Increased risk of fire	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Firefighting equipment will be maintained at fuel storage locations. • Fire prevention methods include designated smoking areas and fire bans as conditions warrant. • As per section 10 and 19 (1) of the Forest Protection Act (GNWT, 2010), Strategic will adhere to 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<p>Forest Fire Prevention and Suppression Guidelines for Industrial Activities (GNWT, 2001).</p> <ul style="list-style-type: none"> In the event of a forest fire, the GNWT Forest Fire Management Division hotline will be called at 1-877-698-3473 	adverse impact on the environment or be a cause of public concern.
Compaction of vegetation	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> Activity will be restricted to the defined Program area and identified water sources, which will limit the area being disturbed. While some hand-clearing of vegetation will be required for safety (helicopter landing area and 10m radius around well centre) and operations (equipment laydown area) care will be taken not to disturb the vegetative mat except where necessary (in the immediate vicinity of the wellhead for cut and cap operations) <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include OFF-ROAD VEHICLE TRAVEL, PREVENTION OF RUTTING, SUSPEND OVERLAND TRAVEL, VEHICLE MOVEMENT FREEZE-UP, HABITAT DAMAGE, WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, and FINAL CLEANUP AND RESOTRATION, CLOSURE AND RECLAMATION PLAN, CLOSURE AND RECLAMATION COMPLETION REPORT, and POST-CLOSURE MONITORING AND MAINTENANCE PLAN.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Direct loss or removal of habitat, dens, or nests	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> The project area will be examined (swept) for den and nest sites prior to start-up of project activities. Den, dam, lodge, and nest sites will be actively avoided. Work crews will be encouraged to support the work of the Wildlife Monitors. Program operations will avoid damaging nests (active or inactive). Destruction, or disruption of eggs and/or nests, including inactive nests, is prohibited by the Canada Wildlife Act s. 51(1) (Government of Canada, 1985a). Operations will not be conducted within 30m of any waterbodies not being crossed. 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Direct injury or mortality	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> The Wildlife Monitor will observe and document wildlife and potential wildlife impacts to ensure 	Adequate mitigation. Based on the described mitigations, the Board

Potential Impact	Activity	<p align="center">Proposed Mitigations</p> <p align="center"><i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i></p>	Board Analysis and Determination
		<p>that appropriate environmental protection measures are being implemented. Species at risk mammal observations will be reported to WILDLIFEOBS@gov.nt.ca. Species at risk bird observations will be reported to NWTchecklist@ec.gc.ca. Species at risk insect observations will be reported to NWTBugs@gov.nt.ca.</p> <ul style="list-style-type: none"> • Program operations will avoid damaging nests (active or inactive). Destruction, or disruption of eggs and/or nests, including inactive nests, is prohibited by the Canada Wildlife Act s. 51(1) (Government of Canada, 1985a). • Operations will not be conducted within 30m of any waterbodies not being crossed. • Table 15: Wildlife Sensitive Periods and Recommended Minimum Setback Distances will be used in field, planning and execution. 	determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Effects on wildlife health (toxins, metals, etc.)	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Waste will be managed in accordance with the Program WMP (refer to Appendix 6). Food will be stored securely, and garbage disposed of frequently. • The deposition of any substance into waters or areas frequented by migratory birds is prohibited under the Migratory Birds Convention Act (Section 5.1). • Substances harmful to migratory birds will not be placed in waters or areas frequented by migratory birds or in a place from which the substance may enter such waters or such an area. <p>The Board has standard permit conditions that are typically used to mitigate the described impacts. These standard conditions include WASTE MANAGEMENT, REPAIR LEAKS, FUEL CACHE SECONDARY CONTAINMENT, FUEL CONTAINMENT, FUEL ON LAND, MAXIMUM FUEL ON SITE, SPILL CONTINGENCY PLAN, SPILL RESPONSE, DRIP TRAYS, CLEAN UP SPILLS, REPORT SPILLS, and FINAL CLEANUP AND RESOTRATION.</p>	<p>Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.</p> <p>Adequate management practices have been committed to by the Applicant and suitable conditions have been included in the Permit.</p> <p>The areas of work were previously disturbed.</p>
Changes to migratory movement patterns	Reclamation	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Work crews will be encouraged to support the work of the Wildlife Monitors. • Helicopter flights within the region will adhere to the minimum flight altitude and vertical distances as recommended in the Northern Land Use Guidelines (GNWT, 2015b) and in the publication Flying Low? Think Again... (GNWT, 2013), unless safety is a concern. • Program activities are not anticipated to occur during the spring and fall migration. • Program activities will be conducted during summer/fall and winter with critical periods in mind to 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
		minimize effect on wildlife (spring and fall). <ul style="list-style-type: none"> Recommended Minimum Flight Altitudes and Sensitive Periods for Wildlife (Table 16) will be used to minimize effects on wildlife 	
Human-wildlife conflicts	Reclamation	The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> Wildlife will not be approached or fed by Program personnel and Program personnel will not be permitted to hunt on the worksites. Vehicles and other equipment will be limited to travelling 40 km/h, will be required to communicate approach and hazards using radios, and will be instructed to slow down when passing wildlife or on-coming traffic. Table 15: Wildlife Sensitive Periods and Recommended Minimum Setback Distances will be used in field, planning and execution. 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Loss or reduction in game species populations	Reclamation	The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> Hunting will not be permitted by Program personnel and harassment of wildlife by persons or equipment, including helicopters, is prohibited (EPP Section 4.14.3). 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Effects on traditional land use, subsistence, and harvesting rights	Reclamation; Equipment	The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> Strategic will notify the Deh Gáh Got'jə First Nation, Dene Tha' First Nation, Fort Providence Metis Council, Ka'a'gee Tu First Nation, K'at'l'odeeche First Nation and the West Point First Nation prior to commencing field activities. Hunting will not be permitted by Program personnel and harassment of wildlife by persons or equipment, including helicopters, is prohibited (EPP Section 4.14.3). 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Increased human health hazard and risk	Reclamation; Equipment	The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> Strategic will post speed limit signs on access roads and wildlife will be given the right-of-way (Section 4.8). 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Change in ecological,	Reclamation; Equipment	The Applicant proposed the following mitigations in the Application: <ul style="list-style-type: none"> Strategic will only withdraw water for the proposed Program activities to avoid conflicts with 	Adequate mitigation. Based on the described mitigations, the Board

Potential Impact	Activity	Proposed Mitigations <i>Description of measures to reduce potential impacts, including consideration of cumulative impacts and climate change.</i>	Board Analysis and Determination
cultural, social, or economic values		water sources.	determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.
Impairment of the recreational or traditional uses of the land or water	Reclamation; Equipment	<p>The Applicant proposed the following mitigations in the Application:</p> <ul style="list-style-type: none"> • Rights and stakeholders will be provided a schedule of planned activities and consulted for a coordinated approach. • Despite the fact that impacts to heritage resources are not likely to occur, Strategic will implement procedures described in the EPP Appendix 1-F. 	Adequate mitigation. Based on the described mitigations, the Board determined that the proposed activities will not have a significant adverse impact on the environment or be a cause of public concern.

4.1 Consideration of Potential Impacts

Based on the potential impacts and proposed mitigations identified in Table 2 above, the Board considered whether the Project might have a significant adverse impact on the environment. In general, impacts of the Project on the environment can be mitigated through the use of standard permit conditions and/or project-specific conditions established by the Board as per the MVLWB [Standard Process for Creating New Conditions](#). These conditions may include requirements for management and monitoring plans that provide detailed information regarding the implementation of mitigation measures and the evaluation of their effectiveness.

A draft Permit was circulated for review during the regulatory proceeding, and all Parties were given the opportunity to provide comments and recommendations on the draft conditions. In finalizing the conditions, the Board will consider all of the evidence provided through the regulatory proceeding.

4.2 Consideration of Public Concern

In addition to considering the potential impacts of the Project, the Board considered whether the Project might be a cause of public concern.

Based on the evidence provided during the regulatory proceeding, the Board did not identify any comments or issues that indicate that the Project is a cause of public concern.

5.0 Conclusion

The MVLWB/Mackenzie Valley Environmental Impact Review Board completed 4 Environmental Assessments and 2 Preliminary Screenings of the Project on various dates prior to the comprehensive Permit;¹² however, the Application included proposed changes to the Project. Accordingly, the Board has determined that Project activities that have already been subject to Part 5 of the MVRMA are exempt from preliminary screening under Part 1, Schedule 1, section 2.1 of the Exemption List Regulations to the MVRMA. The Board has conducted a preliminary screening of the proposed changes to the Project.

The Board has reviewed all the evidence received during the regulatory process with respect to the Preliminary Screening of the proposed changes to the Project. Based on the evidence, it is the Board's opinion that the proposed changes to the Project will not have a significant adverse impact on the environment or be a cause of public concern, as set out in paragraph 125(1)(a) of the MVRMA. The Board has therefore decided not to refer the proposed changes to the Project to Environmental Assessment. If the Board does not receive a notice of referral to environmental assessment by January 2, 2023, the Board can issue the Permit on January 3, 2023.

SIGNATURE



Mavis Cli-Michaud, Chair
Mackenzie Valley Land and Water Board

December 22, 2022

Date

¹² See MVLWB Online Registry for Strategic Oil and Gas Ltd. – [Environmental Assessment – Oct16 01](#); [Environmental Assessment – Dec6 01](#); [Environmental Assessment – Jun1-04](#); [Environmental Assessment – Nov14 06](#); [Preliminary Screening – Apr7 07](#); [Preliminary Screening – Apr26 07](#).