

EA2223-01 – Imperial Norman Wells Operation

Waste Management Facility

Information Requests– July 22, 2022

via Online Review System

To: Distribution List

Note: The Mackenzie Valley Review Board has uploaded the following information requests to the Online Review System. Please respond to these information requests using the Online Review System at this link:

<https://new.onlinereviewsystem.ca/>

Preamble

The Mackenzie Valley Environmental Impact Review Board (Review Board) is conducting an environmental assessment (EA) on a proposal by Imperial Oil Resources NWT Ltd. (Imperial) to construct and operate a Waste Management Facility (WMF) at its Norman Wells Operation. Imperial states that the WMF is intended to support both ongoing progressive reclamation and eventual final closure and reclamation of the Norman Wells Operations.

A critical step that must be addressed early in the EA is determining the scope of the assessment, which requires a review of:

- 1) what should be included in the development being assessed (the scope of development), and
- 2) which valued environmental components should be the focus of the assessment (the scope of the issues).

The reason for referral by the Sahtu Secretariat Inc. (SSI) includes concerns about the final closure of Imperial's Normal Wells Operations and how the WMF facility relates to the eventual final closure. These concerns are related in part to the scope of development for this EA. Because of these concerns, the Review Board will make a decision on the scope of development early in this EA.

The is issuing information requests (IRs) to help it determine the scope of development. The purpose of these IRs is primarily to seek Imperial's and parties' views on the appropriate scope of the development for this EA, and to solicit other information that Imperial or parties believes

will help the Board decide the scope of development. The Board is also asking Imperial for further information about its Norman Wells Operations to inform the Board and parties about closure activities and timing.

Scoping the Development

Under s 117(1) of the MVRMA the Review Board must determine the scope of development for every EA it conducts. The scope of development includes all physical works and activities required for the project to proceed.

Scoping a development requires careful consideration of what is, and what is not, part of the development. Typically, the scope of development would include what is being proposed by the developer as well as any other physical works or activities that are closely linked to the proposed project. The Review Board's *Environmental Impact Assessment Guidelines* set out three criteria for determining whether a physical work or activity is an accessory to the principal development (to avoid project splitting). These criteria are dependence, linkage and proximity.

- The dependence test asks whether principal development could proceed without undertaking another physical work or activity. If not, then that accessory work or activity is also part of the development.
- The linkage test asks whether the principal development inevitably leads to another physical work or activity. If it does, then that other work or activity is part of the scope of development.
- The proximity test asks whether two physical works or activities proposed by the same developer occur in the same area. If they do, those works or activities may be considered part of the same development.

Parties are encouraged to consider these three tests when providing their views on what the appropriate scope of development for this EA should be.

ORS documents to support the information requests

1. [Application for an amendment to Norman Wells Operation Water Licence S13L1-007 to include a Waste Management Facility](#)
2. [SSI letter of referral to EA](#)

Information Requests to Imperial and parties

Information Request #1 To Imperial and parties

Topic: Scope of development

Preamble: The proposed project that was referred to EA by the SSI was for the construction and operation of the WMF. The referral letter from SSI requested that the scope of development for the EA also include the final closure of the entire Norman Wells Operations. To assist the Review Board in determining the appropriate scope of this development, parties and Imperial are asked to provide their opinions on what the scope of development should include. Before answering the Board's IRs, parties are encouraged to review the Water Licence amendment application for the WMF (ORS attachment)

Detailed information on the plan for final closure of the Norman Wells Operations are not available currently. However, parties can review the Interim Closure and Reclamation Plan for an understanding of what this final closure may involved (ORS attachment).

Information request: Please describe your views and reasoning about the scope of development for this EA, considering if, and how much of, the larger oilfield closure and reclamation should be included (in addition to the construction and operation of the proposed the waste management facility).

Timing: The Review Board requires a response to this information request by:

- For parties, Sept 20, 2022
- For Imperial, Sept 27, 2022

Information Request #2 To Imperial and parties

Topic: Other matters in the SSI referral to EA letter

Preamble: Besides concerns regarding the scope of development for this EA, the referral letter by SSI contains concerns regarding other matters (such as transportation of waste south, the size of the proposed WMF, and potential impacts to downstream communities). The Board is providing the opportunity for Imperial and interested parties to provide their views on any topics contained in this letter. [SSI letter of referral to EA](#)

Information Request: Parties and Imperial are invited to provide their views on any matters and concerns relevant to the environmental assessment that are raised in the SSI referral letter.

Timing: Due date Aug 31, 2022.

Information requests directed to the Developer

Information Request #3 To Imperial

Topic: Project description for the Waste Management Facility

Preamble: The information about the proposed WMF submitted during preliminary screening consists of several separate documents and plans. A single clear project description that fully describes the proposed Waste Management Facility project and compiles this information will assist the Board and parties during the scoping phase.

Information request: Please submit a stand-alone project description document that provides a complete and detailed description of the proposed Waste Management Facility project.

Timing: Due date August 31, 2022

Information Request #4: To Imperial

Topic: Interim Closure and Reclamation Plan – engagement activities

Preamble: The Review Board and other parties require background information on the Interim Closure and Reclamation Plan to put the Waste Management Facility in context within the Norman Wells Operation.

Information request: Please provide a stand-alone document describing engagement activities, community meetings, document submissions, and working group minutes and any other correspondence regarding the Interim Closure and Reclamation Plan since its approval in 2017.

Timing: Due date August 31, 2022

Information request #5: To Imperial

Topic: Water Licence S13L1-007 upcoming renewal timing and proposed content

Preamble: Imperial's Water Licence S13L1-007 renewal submission is upcoming (2025). The developer's perspective would help the Review Board understand any issues regarding a renewal application that includes activities that may still be in an EA process. The Review Board would like to better understand the relationship between this environmental assessment and the upcoming Water Licence renewal.

Information Requests: Please describe the timing of Imperial's upcoming Water Licence S13L1-007 renewal submission, and what aspects of progressive reclamation and final closure of the Norman Wells Operation will be addressed during this upcoming Water Licence renewal.

Timing: Due date August 31, 2022

Information request #6: To Imperial

Topic: Closure date for the Norman Wells Operation

Preamble: To determine the scope of this environmental assessment and plan for the EA process, the Review Board, regulators and parties need a better understanding of the remaining lifecycle of the Norman Wells Operation.

Information request: Please provide the approximate dates or a timeframe when:

- a) oil production will cease at the Norman Wells Operation
- b) use of injection wells will cease at the Norman Wells Operation
- c) oil and/or other hydrocarbons will cease to flow through the Enbridge pipeline
- d) closure activities will transition from progressive reclamation to final closure of the Norman Wells Operation

Timing: Due date August 31, 2022