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Mackenzie Valley Environmental Impact Review Board
Attn: JoAnne Deneron, Chairperson
Box 938, 200 Scotia Centre
5102 – 50 Avenue
Yellowknife, NT X1A 2N7

Submitted via email

Dear Ms. Deneron,

Re: Self-referral for Environmental Assessment of Imperial Oil Resources N.W.T. Limited's Norman Wells Operation Closure and Reclamation

Imperial Oil Resources N.W.T Limited (Imperial) is in the process of planning the future site closure and final reclamation of the Norman Wells Operation (NWO). Imperial is submitting this letter to request the Mackenzie Valley Environmental Impact Review Board (Board) initiate an Environmental Assessment (EA) of closure and reclamation of Imperial's Norman Wells facilities using section 126(3) of the Mackenzie Valley Resource Management Act (MVRMA)¹.

Imperial's NWO facilities associated with the production and sale of oil from the oilfield currently operate under Canada Energy Regulator (CER) Operating Authorization 1210-001 and Sahtu Land and Water Board (SLWB) Water Licence S13L1-007. During an EA for final closure, the facilities are expected to operate under renewed versions of these permits, applications for which are before the Board (EA2425-02²), the SLWB (S24L1-005³), and the CER (OH-001-2023⁴).

The transition from an operating facility to reclamation is an alteration to the previously assessed and approved development and production of the Norman Wells field. The reclamation of Imperial's Norman Wells facilities therefore requires a screening and it is appropriate for the final closure and reclamation of the facility to undergo an Environmental Assessment under Section 114 of the MVRMA. An EA process for closure and reclamation review can provide a public process to achieve public and regulator understanding of the potential effects, mitigations, and monitoring associated with final closure.

Section 2 of the Board's guideline⁵ outlines the optional pathway for a proponent to request the Board open an EA. As the Board is aware from the documents reviewed for EA2425-02, Imperial has been engaged with the Sahtu Secretariat Inc (SSI), designated Sahtu organizations, regulators, local, territorial, and federal governments prior to sending this request for an EA. Furthermore, the Review Board itself has

¹ [Mackenzie Valley Resource Management Act](#), Government of Canada. Last amended August 28, 2019.

² Environmental Assessment [Norman Wells Operations - EA2425-02](#), Mackenzie Valley Review Board.

³ Type A Water Licence Application [Imperial Oil Resources N.W.T. Limited - S24L1-005](#), Sahtu Land and Water Board

⁴ Imperial Oil [Application for Variance of Operations Authorization 1210-001](#) and Line 490 Replacement Project, Canada Energy Regulator.

⁵ [Guideline for an Optional Pathway for Major Projects to Enter Environmental Assessment](#), Mackenzie Valley Review Board, April 2024.

acknowledged that many of the issues articulated by SSI in referring Imperial's application for continued operations are likely more appropriately addressed within an EA for closure and remediation⁶.

Purpose of Initiating an Environmental Assessment at This Time

As part of an open and collaborative approach to develop a final closure and reclamation plan (CRP), Imperial proposes to submit the existing interim closure and reclamation plan (ICRP) to serve as a draft "Proposal for Development". The ICRP can be used to refine and develop a final CRP which would then form the basis for the Board's assessment.

The intention of initiating the closure and reclamation EA before a final "Proposal for Development" is available is directly related to two important messages that designated Sahtu organizations have articulated to Imperial, CIRNAC, the CER, SLWB, and the Board itself:

- The desire to have meaningful engagement in developing closure plans, and
- The desire for funding to be issued to enable meaningful engagement.

By initiating an EA, the Board can address these comments in a formal process.

The outcome of the closure EA is intended to form the foundation of a finalized CRP for subsequent regulatory applications to the CER and SLWB for the NWO closure and reclamation project, in accordance with Part J (5) of Water License S13L1-007 and Condition 21 of OA-1210-001.

Schedule

Imperial anticipates that the EA for closure and reclamation, including the time necessary to include community involvement in developing a finalized CRP as the proposal for development, will take between 5 and 7 years to complete. Outside of the EA process, Imperial will establish closure working groups beginning in 2025 with the SSI and various governments (federal, territorial and municipal) to support the scoping phase. Imperial submits the following conceptual schedule for further development by the Board as the EA progresses.

- EA Start-up Phase – 2025
 - Board opens the EA for closure and reclamation, creates a file on the public registry.
 - For the public registry, Imperial will submit;
 - A summary of the closure and reclamation project.
 - The existing ICRP⁷. The ICRP would serve as a draft proposal for development and help define the scope and schedule of the EA.
 - A reference table with links to applicable current management plans, annual monitoring reports, and studies. These documents are expected to form the foundation of baseline information.
- EA Scoping Phase – 2025 – 2028
 - The Board issues Draft EA Scoping and terms of reference documents for comment on the ICRP.
 - Intervenors review ICRP, provide comments.
 - Imperial prepares Developer's Assessment Proposal addressing intervenor comments.
 - Imperial updates the ICRP.
 - As needed, the Board issues updated EA Scope and terms of reference for technical analysis.
- EA Analysis Phase – 2028
 - Imperial submits a Final CRP and supporting studies.

⁶ [MVEIRB Reasons for Decision Letter, Section 3](#)

⁷ Norman Wells Operations – [Interim Closure and Reclamation Plan \(ICRP\) – March 2016, ICRP Addendum – March 2022](#)

- Intervenors review and comment on CRP and mitigations.
- EA Hearing Phase – 2029
- EA Decision – 2030
- Minister’s Decision – 2030
- Regulatory Application Phase – 2031
 - Imperial applies for major permits (SLWB Water Licence, CER Authorization).
 - Imperial applies for minor permits (To be determined).

Throughout this process, Imperial intends to engage with SSI, communities, and stakeholders and to address the results of that engagement in submissions for the final Closure and Reclamation Plan.

Closing

Imperial believes that the Board has sufficient information to initiate an EA for closure and reclamation. Initiating an EA for closure aids in addressing public interest in the NWO closure and reclamation activities and provides a pathway to meet the SSI Participants’ desire to have meaningful engagement in the closure and reclamation planning process.

Please contact Ben Fraser (benjamin.fraser@esso.ca) or Sam Bird (sam.bird@exxonmobil.com) if you have any further questions.

Sincerely,



Sarah McLaren
Director, Norman Wells Closure
Imperial



Josh Hutchings
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Imperial